



Department of Energy

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JUN 01 1999

Mr. Paul Pardi, RCRA Group Leader
and FFCA Project Manager
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0806-99

Dear Mr. Pardi:

**REVISION 5.0 OF THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT'S
RESOURCE CONSERVATION AND RECOVERY ACT PART A/B PERMIT APPLICATION**

Reference: Letter, J. Craig, U. S. DOE to P. Pardi, OEPA, "Proposed Strategy for Addressing Revisions to the Fernald Environmental Management Project's Resource Conservation and Recovery Act Part A/B Permit Application," dated September 24, 1997

Enclosed are updated sections of the Fernald Environmental Management Project's (FEMP) Resource Conservation and Recovery Act (RCRA) Part A/B Permit Application. The revisions have been completed in accordance with the guidelines established in the above referenced letter. Changes to the application have been made using redlines and strikeouts to assist in reviewing. A summary of these revisions is also enclosed.

If you have any questions, please contact Shannon Kaster at (513) 648-3157.

Sincerely,

Jack R. Craig
Director

FEMP:Kaster

Enclosures:

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Mr. Paul Pardi

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cc w/enclosures:

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**SUMMARY OF REVISIONS
TO THE
FEMP'S RCRA PART A/B PERMIT APPLICATION (REVISION 5.0)**

SECTION A:

1. Figure A-1 (Facility Location Map) and Table A-1 (FEMP Hazardous Waste Management Units) were updated to indicate that closure activities have been completed for Tank T-2 (HWMU #54). A replacement page for the photograph of this unit is provided for Attachment 2.

SECTION B - FACILITY DESCRIPTION:

1. Section B-1b (General Description - CERCLA Activities) was updated to include information on the revised remedy for Silo 3 and the status of remedy selection for Silos 1 and 2.
2. Information on the operation of injection, extraction and withdrawal wells was updated in Section B-2a (Topographic Maps - General Requirements) to reflect the status of well installation as part of the OU5 groundwater remedy and the On-Site Disposal Facility (OSDF) Project.
3. Section B-4 (Traffic Information) was updated to include the use of rail to transport wastes from the Waste Pits Remedial Action Project (WPRAP).
4. Figure B-6 (Production Area Plot plan) has been updated to address changes in site conditions since the last submittal of the Part B Permit Application in May 1998.

SECTION C - WASTE CHARACTERISTICS:

1. Section C-2 (Waste Determination) has been revised to address organizational changes and changes in responsibilities, to clarify parameters used in calculating completeness when sampling containerized waste, and to incorporate changes to LDR treatment standards for characteristic metal wastes following promulgation of the LDR Phase IV, Part 2 Rule.
2. Section C-3 (Operations) has been revised to reflect organizational changes and to clarify that Ohio EPA (rather than USEPA) will be contacted regarding manifest discrepancies involving wastes received from off-site.

**SUMMARY OF REVISIONS TO THE FEMP'S
RCRA PART A/B PERMIT APPLICATION
(REVISION 5.0)**

SECTION C (Continued):

3. LDR notification/certification requirements in Section C-5 (Off-Site Shipment of Wastes) have been revised to reflect changes in these requirements as promulgated in the LDR Phase IV, Part 1 Rule.
4. A current copy of the Material Evaluation Form is provided as Figure C-2.
5. Table C-4 has been updated to include characterizations completed since the last submittal of the Part B Permit Application in May 1998.

SECTION D- PROCESS DESCRIPTION:

1. Descriptions of container management practices at the Plant 1 Pad provided in Section D-1 (Containers) have been revised to include information on the use of hazardous waste storage lockers to store hazardous waste with free liquids and ignitable hazardous waste. Engineered design drawings and a map indicating the location of the hazardous waste storage lockers are provided as Figures D-57 and D-58. Specifications for the locker floor sealants have been added to Attachment D-1 and secondary containment calculations for the storage lockers have been provided as Attachment D-2. Table D-1 (RCRA Storage Units) has been revised to include information on container storage practices at the hazardous waste storage lockers as part of the Plant 1 Pad area.
2. Section D-1a(2) (Container Management Practices) has been revised to clarify that the requirement for a minimum aisle spacing of 24 inches is applicable only to the uncovered sections of the Plant 1 Pad as defined in the original FMPC Drum Management Plan. In addition, the specific reference to a procedure for preparing hazardous waste containers for storage has been deleted since this activity is covered under several procedures depending upon the waste generating source.
3. Text in Section D-1(a)(3)(e) (Removal of Liquids from Containment System) has been corrected to indicate that the FEMP does not conduct daily inspections of the sumps in the tension support structures on Plant 1 Pad to check for the presence of free liquids. The FEMP does check for evidence of leaks and spills as part of the weekly inspection of the Plant 1 Pad conducted in accordance with RCRA requirements.

SECTION D- PROCESS DESCRIPTION (Continued):

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4. Table D-2 (Container Specifications) has been revised to include the use of Intermediate Flexible Bulk Containers (IFBCs) to store hazardous waste at the FEMP.

SECTION F - PROCEDURES TO PREVENT HAZARDS:

1. Section F-1 (Security) has been revised to clarify site access requirements and to include a fourth controlled entry point for site rail yard operations.
2. Changes to the FEMP's fire protection system have been incorporated into Section F-3 (Preparedness and Prevention). These include the following changes: 1) the deactivation of the former production wells as a source of water for firefighting purposes; 2) the installation of a Domestic and Fire Water Storage Tank and Booster Tank to replace the existing storage and pumping system; 3) to provide information on the fire suppression systems for the hazardous waste storage lockers; and 4) to address the current status of the fire suppression system for the CP Storage Warehouse (Building 56). This system is currently out-of-service but will be re-activated prior to storing containers of ignitable wastes in the building, if necessary. Information on external communications has also been updated to include a direct radio link to the Butler County Emergency Management Agency in the event of an emergency.
3. Information on stormwater flows from the uncovered portions of Plant 1 Pad in Section F-4 (Preventive Procedures, Structures and Equipment) has been updated.
4. Text describing the number of vented drums stored on-site has been deleted from Section 5 (Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes) since this information is outdated.
5. The frequency for testing fire alarm systems in Attachment F-1 (FEMP Inspection Schedule) has been revised from annual to semi-annual based on NFPA standards.

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**SUMMARY OF REVISIONS TO THE FEMP'S
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SECTION G - CONTINGENCY PLAN:

1. The list of hazardous waste storage areas in Section G-1 (General Information) has been updated to include the hazardous waste storage lockers, the Liquid Mixed Waste Project Bulk Tanks (which are being relocated near the boundary of the Plant 1 Pad), and Quonset #1 (Building 60). This section has also been revised to address organizational changes and to delete the requirement to post evacuation maps at individual HWMUs (although they are still required to be posted inside buildings).
2. Information in Section G has been updated to reflect changes to internal and external emergency response organizations. Additional revisions were required to address changes to the FEMP's fire protection system (as discussed in Section F above), internal/external communications and alarm systems, and to delete the requirement to distribute Contingency Plans that have been amended through a permit revision.
3. A description of actions to be taken to address surface impoundment spills and leakage at Waste Pit Number 5 has been deleted from Section G-4 (Emergency Response Procedures). This information is already addressed in approved CERCLA documents including the Pre-Operational Health and Safety Plan in the OU1 Remedial Design Documents Package and the Health and Safety Plan in the OU1 Remedial Action Documents Package.
4. Table G-2 (FEMP Emergency Organization Roster) and Figure G-2 (FEMP Emergency Response Organization) have been revised to reflect organizational changes. Revised Figures G-3.1 (Emergency Response Training Requirements), G-6 (Communications Links) and G-7 (Interorganizational Links) are also provided.
5. Attachment G-1 (Emergency Procedures, Site Layout and Equipment Information) has been revised to update information on the location and types of safety and emergency equipment required for each hazardous waste management unit. Evacuation route maps for several units have also been revised. Maps and text have been updated to remove Tank T-2 (#54) since closure activities have been completed for this unit. Evacuation maps and information on safety and emergency equipment has been added for the Liquid Mixed Waste Project Bulk tanks, the hazardous waste storage lockers and Quonset Hut #1 (Building 60). Text clarifying the roles and responsibilities for responding to fires at the FEMP has been added.

SECTION G - CONTINGENCY PLAN (Continued):



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6. Maps have been provided to update the information in Attachment G-2 (Location of FEMP Fire Hydrants).

SECTION H - PERSONNEL TRAINING:

1. Section H has been revised to reference the Job Specific Training and Qualification Program Description for tracking job-specific training and to reflect changes in responsibilities for maintaining certain types of training records.