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MAY 31 2000

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-0731-00

Dear Mr. Pardi:

**REVISION 6.0 OF THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT'S
RESOURCE CONSERVATION AND RECOVERY ACT PART A/B PERMIT APPLICATION**

Reference: Letter, J. Craig, U. S. DOE-FEMP, 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 (Revision 6.0). 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 John Sattler at (513) 648-3145.

Sincerely,

Jack R. Craig
Director

FEMP:Kaster

Enclosures

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Mr. Paul Pardi

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MAY 31 2000

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**SUMMARY OF CHANGES
TO THE
FEMP'S RCRA PART A/B PERMIT APPLICATION
(REVISION 6.0)**

SECTION A

1. A new facility contact is identified in Section V and the name of the Co-operator listed in Section VII has been changed to Fluor Fernald, Inc. to reflect a recent name change within the corporation.
2. The list of environmental permits provided in Section XA (Other Environmental Permits) and Attachment 1 has been updated
3. The total number of storage units and the maximum storage capacity listed in Section XII (Process Codes and Design Capacities) has been revised to reflect the removal of KC-2 Warehouse from the Part A/B Permit Application.
4. The following new EPA waste codes have been added to Section XIV: D013, D014, D015, D023, D024, D025, D031, P012, P018, P106, P113, P115, P119, P120, U003, U056, U122, U218, and U219. These waste codes are associated with small quantities of lab-packed chemicals. A new estimate for the annual quantity of waste is provided in Section XIV based on information compiled for the FEMP's 1999 RCRA Annual Report.
5. Figure A-1 (Facility Location Map) and Table A-1 (FEMP Hazardous Waste Management Units) have been updated to indicate that KC-2 Warehouse (#34), Trane Thermal Liquid Incinerator (#28), and Uranyl Nitrate Tanks - Raffinate Building (#50) have been closed under the Integrated RCRA/CERCLA process. Replacement pages for the photographs of these units are provided as Attachment 2.

SECTION B - FACILITY DESCRIPTION

- 1) Section B was revised to update facility access, traffic and site security information, address the status of the development of remedial alternatives for the Silos Project, to remove the reference to the Drum Management Plan, and to update information provided on extraction and withdrawal wells installed as part of the Operable Unit 5 final remedy.
- 2) KC-2 Warehouse (Building 63) was removed from Table B-1 (Container Storage Areas to be Permitted at the FEMP). Updated site maps are provided as Figure B-6.

SECTION C- WASTE CHARACTERISTICS

- 1) Section 2.0 (Waste Determination) has been revised to clarify that the MEF process described in this section applies to the characterization of containerized waste. Bulk soil and debris and waste waters generated from CERCLA remedial activities are evaluated for disposition in accordance with processes described in CERCLA work plans and remedial design documents. Clarification has been added to describe the process for evaluating a waste for listed considerations.
- 2) References to the Prototype Sampling and Analysis Plan for Waste at the FEMP have been updated. A copy of the latest revision to this plan is provided as Attachment C-7.
- 3) Clarification was added to subsections describing the types of containers used at the FEMP for hazardous waste storage, the type of information maintained in a field log, when compatibility testing will be conducted, the specific steps in the equipment decontamination process, the evaluation of a waste for listing considerations and the designation of California List constituents on LDR forms.
- 4) Updated copies of Figures C-2 (Material Evaluation Form) and C-7 (Chain of Custody) are provided.
- 5) Table C-3 (DOE Waste Categories Descriptions and Analysis Rational - Lab Packs) has been updated to include the nineteen new EPA waste codes added to the FEMP's Part A Permit Application.
- 6) Table C-4, RCRA Hazardous Waste Streams, has been revised to include characterizations completed since the last submittal of the FEMP's RCRA Part A/B Permit Application (Revision 5.0).

SECTION D- PROCESS INFORMATION

- 1) References to the use of KC-2 Warehouse (Building 63) for the storage of hazardous waste have been deleted from this section since this unit has been closed under the Integrated RCRA/CERCLA process.
- 2) Section D-1 (Container) was revised to identify the three hazardous waste storage units that are currently not being used for the storage of hazardous waste (CP Storage Warehouse (Building 56), Pilot Plant Warehouse (Building 68) and Plant 8 Warehouse) (Building 80)). The interim decontamination of these units was completed as described in information provided to Ohio EPA. It is also noted that the FEMP is currently staging samples in Building 68. Text was added to this section to indicate that containers of hazardous waste are elevated while in storage. However, pallets are no longer

specified since they are not used for boxes. Boxes are equipped with runners which elevate these containers while in storage.

- 2) Section D-1a (Containers With Free Liquids) has been revised to include additional information on portable tanks used for hazardous waste storage and to provide clarification on inspection requirements for containers used for storing hazardous waste vs. requirements for inspecting containers prior to transport. Additional information is provided on the contents of the MC&A Material Movement Record (MMR) which is used to track internal container movements, the use of filter vent plugs for containers of mixed waste, and the types of absorbent used in spill response.
- 3) The location of the hazardous waste storage lockers described in Section D-1a(3) (Secondary Containment System Design and Operation) has been corrected to indicate that these lockers are located south of the tension support structures. A description of the type of coating that is planned to be used in repairing the TS-6 sump has been added. Specifications for this coating will be provided to Ohio EPA at a later date as an update to Attachment D-1. Text was added to specify the types of run-off controls in place for the Plant 1 Pad covered structures (i.e. the hazardous waste storage lockers and the tension support structures).
- 4) Section D-11 (Subpart CC) was added to address compliance with Subpart CC standards for controlling emissions of volatile organic compounds from containers of hazardous waste.
- 5) Figure D-1 (Site Map of RCRA Storage Units) has been revised to reflect the removal of KC-2 Warehouse from the Part B Permit Application.
- 6) An updated Figure D-57 (Location of Hazardous Waste Storage Lockers) is provided indicating the final configuration of the hazardous waste storage lockers in the southwest corner of Plant 1 Pad (the previous version of this map had identified the planned configuration for these lockers).
- 8) Table D-1 (RCRA Storage Units) has been revised to remove KC-2 Warehouse and to clarify that the information provided in the table addresses requirements for storing ignitable liquids. An evaluation of NFPA standards indicates that the Tension Support Structures on Plant 1 Pad can be used for the storage of ignitable solids (e.g. oxidizers). However, ignitable liquids will not be stored in the Tension Support Structures.

SECTION F - PROCEDURES TO PREVENT HAZARDS

- 1) Section F-1 (Security) has been updated to include information on additional site access points.

- 2) Section F-2 (Inspections) has been revised to include the requirement to conduct annual hydrostatic testing of the TS-6 sump, to address compliance with Subpart CC air emission standards for containers, and to specify the use of Building 71 for repackaging containers of hazardous waste.
- 3) Text has been added to Section F-2d (Inspection Forms) clarifying that these are the minimum required elements for an inspection form (i.e. additional items may be included on these forms as needed). Updated copies of inspection forms for the five RCRA storage units are provided as Attachment F-2.
- 4) Information on the types and locations of emergency and spill control equipment available at the FEMP in Section F-3 (Preparedness and Prevention Requirements) has been updated. The description of the FEMP's fire protection system has been revised to include the installation of the new Domestic and Fire Water Storage Tank. Clarification has been added to the discussion of aisle spacing to indicate that a minimum aisle spacing of 24 inches (rather than 22 inches) is maintained for outdoor storage areas.
- 5) Section F-4 (Preventive Procedures, Structures and Equipment) has been revised to: 1) remove Plant 6 Warehouse (Building 79) from the list of units equipped with a dock to receive hazardous wastes shipped from off-site; 2) include additional information on procedures for inspecting the hazardous waste storage lockers; 3) update the list of equipment available in the event of a power failure and the locations for storing personal protection equipment; and 4) address compliance with Subpart CC air emission standards for containers of hazardous waste.
- 6) Additional revisions were required to Section F to remove references to KC-2 Warehouse (Building 63) and to provide information on the use of filter vent plugs for containers storing mixed waste.
- 7) Attachment F-1 (Inspection Schedules) was revised to provide separate inspection schedules for PPE maintained in the hazardous waste storage units vs. PPE maintained in a central area. Due to radiological concerns, PPE such as respirators and coveralls are issued from a central control point and are not maintained at the RCRA storage areas. Fire protection system testing requirements were updated and the requirement to conduct an annual hydrostatic test of the TS-6 sump was added to this schedule.
- 8) Updated copies of inspection forms for the five hazardous waste storage units are provided as Attachment F-2.

SECTION G - CONTINGENCY PLAN

- 1) Section G has been updated to remove KC-2 Warehouse (Building 63) from the list of units used to store hazardous waste and to indicate that the FEMP is no longer planning on relocating the Liquid Mixed Waste Bulk Tanks to Plant 1 Pad. Building 64 (Thorium Warehouse) and Building 65 (Old Plant 5 Warehouse) have been added to the list of hazardous waste storage areas. These buildings are being used for the storage of containers of mixed thorium waste as part of the site's CERCLA remediation program. It is also noted that the FEMP is currently staging samples in the Pilot Plant Warehouse under the sample exclusion in OAC 3745-51-04(D).
- 2) Training requirements for emergency personnel have been updated as discussed in Section G-2 (Emergency Coordination) and Figure G-3.1 (Emergency Response Training Requirements).
- 3) Section G-5 (Emergency Support and Equipment) has been revised to address the current status of installing the site's new Domestic and Fire Water Storage Tank and Booster. In addition, text has been revised to indicate that the fire suppression system in Building 56 has been re-activated although the building is currently not being used for the storage of hazardous waste.
- 4) Updated copies of Table G-1 (Emergency Operation Personnel and Organizations), Table G-2 (The FEMP Emergency Organization Roster), Table G-3 (Emergency Respiratory Equipment), and Table G-4 (Types of Pressurized Fire Extinguishers) are provided. In addition, Figure G-1 (Permitted RCRA Storage Units) and Figure G-5.2 (Emergency Action Level Guide) have been revised.
- 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 maps and lists of safety and emergency equipment provided for the Trane Incinerator (#28), KC-2 Warehouse (#34) and the UNH Tanks - Raffinate Building (#50) have been removed since these units have been closed. Evacuation maps and safety and emergency equipment lists have been added for Buildings 64 and 65 which are currently being used for the storage of containers of thorium mixed waste.
- 6) Maps provided as Attachment G-2 (Location of FEMP Fire Hydrants) have been updated.

- 7) A new Memorandum of Understanding (MOU) with University Hospital, Inc. is included as Attachment G-3. This replaces the MOU with UC Medical Center as provided in pages 9 through 11 of Revision 5.0 of the Contingency Plan.

SECTION H - PERSONNEL TRAINING

- 1) This section has been revised to address organizational changes and to provide additional clarification on the types of training received by all personnel at the facility vs. training received by personnel directly involved with the management of hazardous waste.