



Department of Energy

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3188



AUG 28 2000

Mr. Phillip C. Harris
Division of Hazardous Waste Management
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0944-00

Dear Mr. Harris:

REVISION TO SECTION F - PROCEDURES TO PREVENT HAZARDS OF THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT'S RESOURCE CONSERVATION AND RECOVERY ACT PART A/B PERMIT APPLICATION (REVISION 6.1)

Enclosed is a revision to Section F - Procedures to Prevent Hazards of the Fernald Environmental Management Project's (FEMP) Resource Conservation and Recovery Act (RCRA) Part B Permit Application to include the use of the Chemical Warehouse (Building 30A) for repackaging containers of hazardous waste (Enclosure 1). As discussed in a July 14, 2000 telephone conversation with Phil Harris of the Ohio Environmental Protection Agency (OEPA), this building will be used in addition to Building 71, which is already identified as a repackaging area in the FEMP's RCRA Part B Permit Application. Building 30A will provide an alternate location for conducting these activities since Building 71 is also used for repackaging nuclear materials for off-site shipment.

Building 30A is located southeast of Plant 1 Pad, at the northwest corner of Second and B Streets. Repackaging of hazardous waste containers will occur in the sampling room, an enclosed area located in the northeast corner of the building (Enclosure 2). High-Efficiency Particulate Air (HEPA) filtration has been installed in this area to mitigate any emissions of airborne particulates generated from repackaging operations, and the required support functions are already in place (i.e. changeout and work areas, personnel contamination monitor, access to airline respirators).

Repackaging operations in Building 30A will be conducted within a secondary containment area constructed of Herculite diking. A second area will be established in the northwest corner of the building to stage containers, as necessary, prior to transport to the repack area. Herculite diking or individual spill control pallets/containments will be used in this area to provide secondary containment and to segregate incompatible containers of hazardous waste while they are being staged for repackaging.

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Inspections will be conducted of all containers of hazardous waste that are staged in these areas in accordance with the 1988 Consent Decree and its Stipulated Amendment. The leaking/deteriorated container will be repackaged. Inventory reports identifying the date each container of hazardous waste was moved into Building 30A will be reviewed on a weekly basis to ensure that these containers are returned to a RCRA storage unit in a timely manner (not to exceed ninety days).

The revised information is provided as a replacement to Page 6 in Section F of the FEMP's RCRA Part B Permit Application. This revision is identified using redlines for easy identification. If you have any questions regarding this information, or require additional information, please contact John Sattler at (513) 648-3145.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Kaster

Enclosures

cc w/enclosures:
AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosures:
S. Kaster, OH/FEMP
J. Sattler, OH/FEMP
J. W. Duling, Fluor Fernald, Inc./50
T. A. Poff, Fluor Fernald, Inc./65-2

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ENCLOSURE 1

F-2c Remedial Action

Repairs or other actions taken to remediate problems identified during an inspection are recorded on the inspection forms. Deficiencies are reported to the supervisor and arrangements for prompt, appropriate remediation of the problem are made.

Repairs are made in a timely manner so that a situation does not lead to an environmental or human health hazard. Items identified as missing or present in insufficient quantities such as emergency equipment are obtained promptly and placed in the proper location. The remedial response to deficiencies is to restore an item to proper working order, or to restock an item to ensure its availability in an emergency.

Leaking, damaged, or deteriorating containers identified during an inspection are overpacked or redrummed. Drums are overpacked by placing the leaking container into a larger-size container. Repackaging is accomplished by transferring the contents of the damaged drum into a different container. Repackaging of hazardous waste containers is conducted in Building 71 and Building 30A.

F-2d Inspection Forms

Attachment F-2 (RCRA Container Storage Area Inspection Forms) provides examples of the current inspection forms. These examples are subject to change. The inspection forms have been designed to readily identify those areas routinely checked for acceptability and highlight conditions which potentially could cause problems.

Inspection forms include at a minimum, the following information:

- Date of inspection
- Time of inspection
- Name of the inspector
- Notation of the observation(s) made
- Corrective action(s) taken
- Date corrected.

F-3 PREPAREDNESS AND PREVENTION REQUIREMENTS

The FEMP does not wish to request a waiver of the preparedness and prevention requirements under OAC 3745-54-30 (40 CFR 264 Subpart C). Requirements of this Subpart are also discussed in further detail in Section D, Process Information, and Section G, Contingency Plan, of this application.

F-3a Equipment Requirements

A detailed discussion of the FEMP emergency equipment and communications systems and the capabilities of each item is provided in Section G, Contingency Plan.

**F-3a(1) Internal Communications
Communications within a Unit**

Voice communication is used within any single RCRA storage unit. Voice communication is adequate to provide immediate emergency instruction to personnel within the storage areas of the building because of the sizes and open configurations of the storage units.

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ENCLOSURE 2

ROL
VT

STAGING AREA

SAMPLING ROOM
(REPACKAGING AREA)

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RTR

CHEM. WHSE.
(BLDG. 30A)

OFFICES

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T-26

T-514

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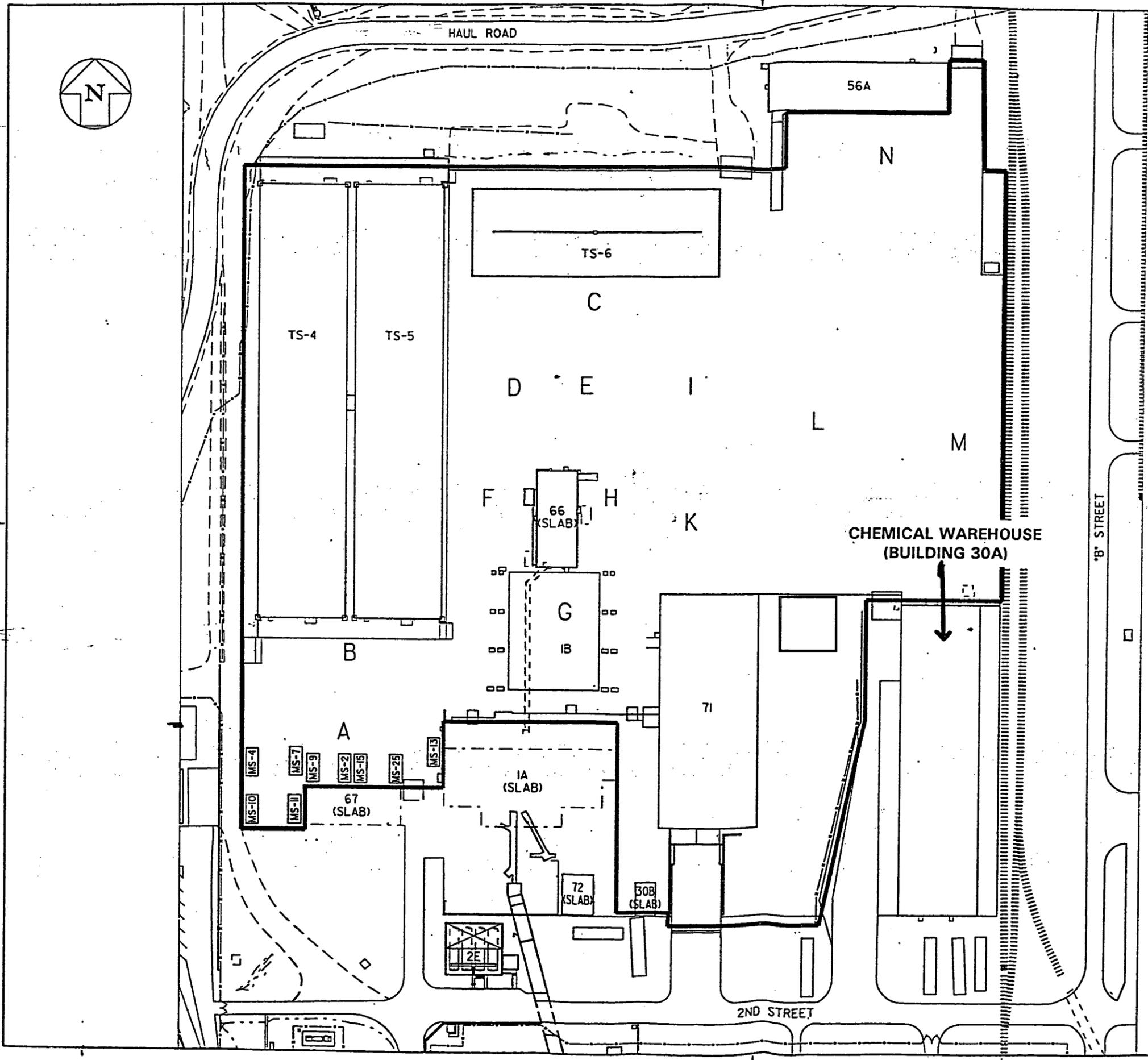
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--- PLANT I PAD: RCRA PART B PERMIT
(HWMU #20 BOUNDARY)

Fernald Environmental
Management Project

FLUOR FERNALD, INC. 

U.S. DEPARTMENT OF ENERGY

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RES #409
DATE 4/8/00
DRAWN S.J.SMOCK