



Department of Energy

Ohio Field Office
Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



4074

DEC 31 2001

Mr. Walt Francis
United States Environmental Protection Agency
77 West Jackson Boulevard - DE-9J
Chicago, IL 60604-3590

DOE-0196-02

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

JOINT HAZARDOUS WASTE INSPECTION, DECEMBER 2001 - ADDITIONAL INFORMATION

On December 12, 2001, you conducted a joint Resource Conservation and Recovery Act (RCRA) inspection of the Fernald Environmental Management Project (FEMP). Your inspection included a field inspection of active and inactive RCRA locations at the FEMP as well as a records review. In your outbrief, you identified two areas that required additional explanation in order to conclude your inspection:

- 1) How does the FEMP ensure that RCRA training requirements are met; and
- 2) Information concerning the return of off-site waste material (asbestos mixed with lead) from Tennessee (Facility ID TND987778834).

We are providing information on both those areas.

In response to how we meet the RCRA training requirements, enclosed is an extract from the FEMP RCRA Part B Permit Application (Rev. 7, 05/2001) that states that the General Employee Training (GET) and other site training such as Site Worker Training and Radiological Worker Training are the training courses which provide information on the management of hazardous waste. A list of training topics (facility description, security, etc.) are listed and the appropriate pages are referenced to the enclosed Student Handout for General Employee Training (Rev. 4, February, 2001) and Site Worker Training Study Guide (Rev. 2, February, 1996) to demonstrate how the RCRA training objectives are achieved.

DEC 31 2001

DOE-0196-02

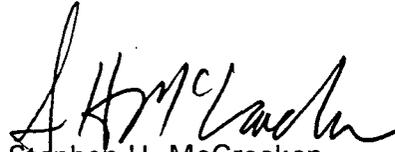
Mr. Walt Francis
Mr. Phillip Harris

-2-

For the second topic, Mr. Walt Francis brought several United States Environmental Protection Agency Biennial Reporting System (BSR) reports that show that FEMP has received wastes from off-site sources. The concern is that in Section 3.2 of the 1988 Consent Decree between the State of Ohio and United States Department of Energy, it states that "No hazardous or mixed waste from an off-site source not already listed in the FMPC Part B Permit Application, or a revision as of the date of entry of this Consent Decree, shall be stored, disposed of or treated at the Feed Materials Production Center without prior approval of the State of Ohio." In particular, 2.467 tons of asbestos solids mixed with lead (DO08) were returned from a facility in Tennessee. In researching our records, the waste in question was generated from the processing of the Scrap Copper Pile that was located on the Plant 1 Pad and was remediated under Removal Action #15. The project was handled by Manufacturing Science Corporation (MSC) and can be tracked through the enclosed manifest and related documentation. Our office faxed notification of our intent to receive the waste on April 24, 1997, and we received confirmation from Mr. Paul Pardi, Ohio Environmental Protection Agency, on May 9, 1997 granting approval to receive 54 drums of waste from MSC. We have received other wastes from off-site locations such as laboratory wastes generated from the analysis of FEMP samples and have the documentation to support it.

If you have any questions concerning these topics, please contact Ed Skintik at (513) 648-3151.

Sincerely,



Stephen H. McCracken
Director

FEMP:Skintik

Enclosures: As Stated

cc w/enclosures:
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosures:
J. Buckley, Fluor Fernald, Inc./MS52-3
T. Poff, Fluor Fernald, Inc./MS65-2
M. Sucher, Fluor Fernald, Inc./MS8

background that the employee has already received on RCRA hazardous waste operations and focus specifically on hazardous waste operations in their ~~historical~~ job.

H-1b(1) Training Content

General Employee Training applies to all FEMP workers, contracted employees, and temporary personnel who are not visitors, including those not directly involved with hazardous waste management. GET addresses employees' rights and responsibilities for a safe and healthful work environment under applicable safety and health regulations in addition to the following topics:

- General description of facility - P. 1
- Production history - P. 1
- Regulatory issues - *Applicable regulatory issues summarized at the beginning of each module*
- Policy and procedures - P. 43
- Site security program description - P. 53
- Facility Emergency Plan - P. 17
- Overview of 29 CFR 1910.120 - P. 20
- Safety and health philosophy - P. 13
- Classification of hazards - P. 20
- Waste Management - P. 6
- Emergencies and RCRA contingency plan - P. 17, P. 60
- Quality assurance program - P. 4

Those employees directly involved in the management of hazardous waste, in addition to GET, are required to attend Site Worker Training and Radiological Worker Training.

These courses include instruction on the RCRA Occupational Safety and Health Administration (OSHA) regulations, and emergency procedures for handling both hazardous and mixed site-generated waste. These courses cover the following topics:

- Safety and Health information (basic) - *modules II, III, IV*
- Engineering controls - *Module V*
- Legal/Regulatory aspects - *Module I (Site and Regulatory Overview) and P. 91 (Hazard Communication Standards)*

Annual Refresher training on the topics taught in GET, SWT, and RAD is provided in the Site Worker Refresher Training and GET Refresher. This program provides employees with a review of the initial training topics, lessons learned, and current information relating to operations at the FEMP.

Job specific training is provided by personnel assigned by their managers, who are qualified in hazardous waste management procedures. The training focuses on RCRA operations inherent to the employee's job assignment. The program is designed to ensure the employee's ability to effectively respond to emergency situations such as fires, spills, or explosions, ground-water contamination events, shutdown operations, and methods for communicating and responding to site wide alarm systems.

H-1b(2) Training Frequency

All FEMP employees are required to complete the indicated initial courses upon employment, and prior to performing unsupervised waste management activities. Employees are also required to attend annual refresher training per the dates established in each individual employee's Profile Profile.

Employees do not work unsupervised in hazardous waste management positions until they have completed the required initial training. All managers of new or reassigned employees to their work centers will be responsible for ensuring that those employees are properly trained and qualified to perform duties associated with waste management activities.

H-1b(3) Training Techniques

A variety of instruction techniques are used at the FEMP depending on the subject matter and the techniques that best suit the learning objectives. Many courses include a combination of lecture, demonstrations, visual aids (such as video tapes, slides, and view graphs, computer based training), and exercises. Most equipment operation courses include hands-on practical instruction.



Envirofacts **Biennial Reporting System** Report Error
 Warehouse Overview Law EXIT EPA Query Model Feedback EF Home

BRS Reports

BRS Facility Summary Report

Facility Information:

<u>HANDLER NAME:</u>	US DOE FERNALD ENV MGMT PROJECT	<u>HANDLER ID:</u>	OH6890008976
<u>STREET 1:</u>	7400 WILLEY ROAD	<u>REPORTING YEAR:</u>	1997
<u>STREET 2:</u>			
<u>CITY:</u>	FERNALD	<u>GENERATOR STATUS:</u>	1 = LQG
<u>STATE:</u>	OH	<u>ONSITE PERMITTED STORAGE:</u>	4 = Tanks and Containers
<u>ZIP CODE:</u>	450300000	<u>ONSITE PERMITTED TREATMENT:</u>	3 = YES RCRA TDR
<u>COUNTY:</u>	HAMILTON	<u>ONSITE EXEMPT TREATMENT:</u>	=

Mailing Information:

HANDLER NAME: US DOE FERNALD ENV MGMT PROJECT
STREET 1: P.O. BOX 538705
STREET 2:
CITY: CINCINNATI
STATE: OH
ZIP CODE: 452538705

Basic Waste Information:

Note: Please note that the wastes shown in the following table are in tons.

WASTE TYPE	NATIONAL REPORT	FEDERAL WASTE	TOTAL WASTE
GENERATION		67	67
MANAGEMENT		11	11
WASTE RECEIVED		2	2
WASTE SHIPPED		297	297
INCINERATION			
DISPOSAL			
ACUTE GENERATION			

RTS

http://oaspub.epa.gov/enviro/brs_r...value3=&cvalue1=&cvalue2=&cvalue3=

Waste received from off-site

FACILITY ID: TND987778834

4074

NAME:

ADDRESS:

<u>TONS RECEIVED</u>	<u>ORIGIN CODE</u>	<u>FORM CODE</u>	<u>SOURCE CODE</u>	<u>WASTE CODE1</u>	<u>WASTE CODE2</u>	<u>WASTE CODE3</u>	<u>WASTE CODE4</u>	<u>WASTE CODE5</u>	<u>REM W C</u>
2.467	6 = WASTE FROM FORM WR	B311 = Asbestos solids		D008 = Lead					

6

Process Knowledge File Narrative

Determination:

RCRA hazardous, low-level radioactive, mixed RACM

Description:

Tan to black fibrous material

Process Generating the Waste:

FERMCO contracted with Manufacturing Sciences Corporation [MSC] to conduct an engineering study for the purpose of identifying and demonstrating a process for removing uranium and asbestos contamination from a quantity of scrap copper motor windings. The windings originate from the Scrap Copper Pile previously located on the Plant 1 Pad. The Copper Pile was remediated under Removal Action #15.

MSC received approximately 30 tons of windings for the study. The windings were containerized in the "40X20" boxes. The windings measured several feet in length and were wrapped in a "fibrous type tape". The approach was designed to separate the asbestos bearing insulation from the copper wire by mechanically shredding and granulating the windings into pieces measuring approximately 1/2 inch by 1/4 inch. The shredded copper was segregated from the insulating material using an air separation table. The process yielded approximately 90% of the incoming net weight as recovered copper.

The separated insulating material was generated from three areas of the process. The cartridge air filters generated 23 1/2 drums of material, 4 drums were generated from cleaning residual material from the bottom of the two incoming containers. The operation of the air table generated an additional 2 1/2 drums of material. An additional 24 drums of contaminated cartridge filters were generated during the study.

The 30 containers of insulating material constitute the principle waste generated during the study. It is the waste characterized by MEF 2998.

Radiological/Chemical Composition:

This waste contains very little radiological contamination. Radiological data is

assigned by MC&A in the SWIFTS database record for this inventory.

TCLP analysis indicates that the waste exceeds the regulatory threshold for lead.

Composite sampling and analysis was performed for the presence of asbestos. Composite results indicated that the asbestos content does not exceed 1%. However, one sample result was reported at 7.5%. A repeat analysis indicates that less than 1% of the material is asbestos fiber.

However, composite sampling is not referenced in the regulations. The referenced method is Polarized Light Microscopy [PLM] as found in Section A of Appendix F to 40 CFR 763. Samples are assumed to be grab samples of bulk asbestos.

The original Scrap Copper Pile consisted of a heterogeneous collection of motor windings. Sample results of the copper pile contents indicate that the insulation varies in asbestos content from 0% to 80%. The windings are characterized and managed as RACM. After the insulated windings were shredded at MSC, it is possible that each drum of dust collector residue contains material of varying asbestos content. It is possible that each drum of residue contains regulated levels of asbestos.

This waste is characterized as RCRA-hazardous, low-level radioactive, mixed RACM.

Inventory of Materials:

See the inventory for verification MEF 2998-2491. The inventory consists of the 30 drums recorded in the SWIFTS database under MEF 2998.

Reference Documents:

Final Report, FERMC O Subcontract No. 95PS005976, *ENGINEERING STUDY FOR DECONTAMINATION AND UNRESTRICTED RELEASE FOR RECYCLE OF COPPER WHICH IS SURFACE CONTAMINATED WITH URANIUM AND ASBESTOS*, Manufacturing Sciences Corporation, 4/30/97
WMCO:OSH (IH):88:403, *BULK SAMPLE RESULTS FOR ASBESTOS AT THE COPPER SCRAP PILE*, A Letter From R. B. Grant to W. M. Benson, August 3, 1988
Consent Agreement Removal Action #15 Scrap Metal Piles Work Plan, Fernald Environmental Management Project, Westinghouse Environmental Management Company of Ohio, April 1992

Project Completion Report
ENGINEERING
FOR
DECONTAMINATION AND UNRESTRICTED RELEASE
OF COPPER WHICH IS SURFACE CONTAMINATED
WITH URANIUM AND ASBESTOS

1.0 Introduction

Approximately 1200 tons of scrap copper motor winding are stored at the Fernald Environmental Management Project (FEMP). These motor windings are surface contaminated with uranium and some of the insulation contains asbestos. In addition some lead (Pb) solder is present on the ends of some the copper wire ends. This engineering study was initiated to identify and demonstrate a process for removal of the uranium and asbestos contamination allowing free release of the copper for recycling. In addition the study is to develop and demonstrate a process for the collection, characterization and containerization of all secondary wastes generated by the process.

1.1 Description of Copper Motor Windings

Manufacturing Sciences Corporation (MSC) received two 8' x 8' x 20' metal containers of copper motor windings (approximately 30 ton total) contaminated with uranium and asbestos for this engineering study. The windings were approximately 1/2" wide by 1/8" thick and were of random lengths ranging to several feet long. The windings were wrapped with a fibrous type tape. The windings were entangled with one another creating a large "spaghetti like" pile. As the containers were stored outside at the FEMP, significant amounts of rain water had entered them, wetting much of the insulation and the absorbent pads in the bottom of the container even after the containers were drained at FEMP prior to shipment. It was apparent, during the processing, that a few of the windings did have ends with solder still remaining. There was no evidence of the encapsulation solution (Childer's Product CP-240) applied at the FEMP prior to putting the copper in the metal containers.

2.0 Executive Summary

The engineering study approach was to break the bond between the asbestos bearing insulation and the copper by mechanically shredding and granulating the windings into pieces approximately 1/2" x 1/4" in length and width. Following the mechanical processing the insulation was segregated from the copper by an air separation table. The granulated copper and the insulation were collected in 55 gallon drums. The insulation was the primary waste stream. This process was successful yielding approximately 90% of the incoming net weight as clean free releasable copper. The waste stream contained only minor amounts of U238 and U235 and, with the exception of one drum, non-detectable amounts of asbestos. It was discovered, during the processing, that the insulation material contained lead to a level that failed TCLP when separated from the copper.

3.0 Engineering Study Approach

In addition to the approach outlined in the Executive Summary above, MSC nominal production sized equipment would be purchased instead of laboratory level equipment. This way a true demonstration of capability could be determined. The equipment was configured in a serial fashion allowing MSC to evaluate the output of each unit. The entire processing area was confined with a PermaCon structure to contain any airborne asbestos or radioactive contaminants. A dedicated cartridge filter unit was purchased and installed ahead of the facility HEPA filter banks. Process flow shown in Figure 1. Work proceeded under the guidance and control of MSC Quality Assurance Program. (See Appendix A - Integrated Manufacturing and Test Plan.)

4074

Due to the fact that this process had not been used before, detailed procedures could not initially be generated for the equipment. Only generic procedures could be written. It was mutually agreed between MSC and FERMCO that the study would be divided into two phases. The initial phase would process only about 1/10 of the material after which no further material would be processed until FERMCO approved of modified procedures written from the experience gained from the initial processing. After the processing of 1/10 of the material it was evident that there was still insufficient information to define the process properly. Again MSC and FERMCO agreed that the phase would be extended to process another 1/10 of the material to gain additional information. Following is a description of the equipment used for the engineering study.

3.1 Equipment Description

The facility used for the separation of copper in this engineering study consisted of a building enclosure containing the following major equipment: a grappler, a shredder, a granulator, an air separation table, a vibrating screen, a conveyor, a dust collection system with an extraction system, a drum dumper, a collection cart, a roll away ladder, and platforms. See Phase 1 layout. An existing overhead crane was shared with other projects. The vibrating screen was removed from the project at the end of Phase 1. (See layout Phase 2) The other equipment was rearranged to accommodate the removal of the vibrating screen, and a flop gate used for copper distribution was redesigned and improved.

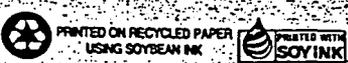
3.2 Enclosure

The facility included a containment enclosure which was a modular type construction building with air locks. A negative pressure was maintained inside the enclosure so that all air flowed into the enclosure and assured no outside distribution of any asbestos dust that may be generated. The enclosure building consisted of three walls and a ceiling, installed against an existing wall, and had the following features:

Total overall dimensions 21 ft wide x 60 ft long x 16 ft high
Including four (4) single personnel doors and (8) window ports
Including twelve (12) acrylic ports for lights and (12) light packages.
With an opening on one side 24 ft wide x 12 ft high and removable panels to cover the opening. With an overhead roof opening 24 inches wide x 30 ft long continuous.

Page 2

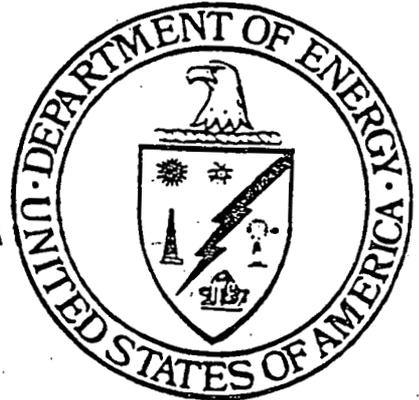
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. T ND 9 8 7 7 7 8 8 3 4	Manifest Document No. 9 7 0 0 1	2. Page 1 of 1	Information in the shaded area is not required by Federal law
3. Generator's Name and Mailing Address Manufacturing Sciences Corporation			A. State Manifest Document Number		
4. Generator's Phone (423) 481-0455			B. State Generator's ID		
5. Transporter 1 Company Name Kindrick Trucking Company		6. US EPA ID Number T ND 9 8 7 7 6 6 0 7 8	C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number	D. Transporter's Phone 423-887-0000		
9. Designated Facility Name and Site Address US DOE Fernald Environmental Management 7400 Willey Road Fernald, OH 45030		10. US EPA ID Number QB 6 8 9 0 0 0 8 9 7 6	E. State Transporter's ID		
			F. Transporter's Phone		
			G. State Facility's ID		
			H. Facility's Phone		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> Waste Radioactive Material, LSA, N.O.S., 7, UN2912		5 4	DM	2 2 4 3	Ka D008
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Lead gross wt 1635 Pounds / 3910 kg			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Danny Nichols		Signature <i>D. Nichols</i>		Month Day 05 18	
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name Dean Curry		Signature <i>Dean Curry</i>		Month Day 05 18	
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name LINDA Sue MURRAY, Facility of FDF		Signature <i>Linda Sue Murray</i>		Month Day 10 17	



TSDF COPY = 11

4074

FACSIMILE TRANSMITTAL



**U.S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE
OFFICE OF ENVIRONMENTAL MANAGEMENT
JOHNNY W. REISING, ASSOCIATE DIRECTOR
SUSAN M. PETERMAN, DEPUTY ASSOCIATE DIRECTOR**

To: Paul Pardi
Organization & Location: Ohio EPA, Dayton, OH
Fax no.: (513)285-6404
From: Bob Danner
Phone: (513)648-3167

Paul,

Attached is a Fact Sheet describing the need to ship some mixed waste from a subcontractor in Oak Ridge, Tennessee to the FEMP for proper storage and disposition. The mixed waste is radioactively contaminated asbestos insulation, HEPA filters, and decon wastes from a study of the recoverability of copper from contaminated scrap. The waste has been found to exceed the TCLP limit for lead (Pb). We are notifying you of this in accordance with the Consent Decree (Section 3.2) which requires prior approval from Ohio for storage, disposal, or treatment of any hazardous or mixed waste not already listed in the FEMP Part B Permit Application.

All the regulated material in the waste to be returned was part of the scrap copper shipped from the FEMP to the subcontractor. There has been no co-mingling with waste from any other facility.

Please indicate your concurrence, as required by the Consent Decree, with the plans to return this waste to the FEMP.

If you have any questions regarding this matter, please call me.

Thanks,
Bob
Bob Danner

Concur: _____
Paul Pardi, Ohio EPA
Southwest District Office

DOE-1502-97

19320

12

FACT SHEET

Wastes generated from an Engineering Study to determine the recoverability of copper from radioactively contaminated scrap copper materials from the FEMP have yielded analytical results above the TCLP hazardous waste limit of 5.0 mg/l for lead. The study, which is being conducted by Manufacturing Sciences Corporation (MSC) in Oak Ridge, Tennessee, involves the decontamination of a sample (approximately 7000 pounds) of the 30 tons of refuse material separated from the scrap copper pile during Removal Action 15. The scrap copper materials included in the study are copper wire coated with asbestos insulation which is radioactively contaminated. Decontamination of the copper is achieved by removal of the insulation through a shredding/separation process.

Waste from the shredding/separation process consists of glass fiber, cellulose, synthetic fibers, binders, small amounts of asbestos, and lead. Analyses of samples from the waste indicate that it should be handled as a mixed low level radioactive/RCRA hazardous waste. Analytical results from TCLP testing of the waste range from 7.7 mg/l to 30 mg/l for lead (Pb). In addition to the separated insulation waste, the HEPA filters used during the study and the waste from cleanup/decontamination of the MSC facility following the study are also potentially mixed waste. The wastes from the study total approximately 50 drums.

The Scope of Work for MSC allows for returning to the FEMP any wastes generated from the engineering study. Mixed waste returned must meet the FEMP Waste Acceptance Criteria (WAC) as stated in the MSC Scope of Work. Upon receipt of the drums of mixed waste, the FEMP shall place them into a storage location as specified in the FEMP RCRA Part B Permit Application. These drums shall remain in RCRA storage until such time that they can be treated in accordance with the Federal Facilities Compliance Agreement.

4074

< CONFIRMATION REPORT >

04-24-1997(THU) 08:41

[TRANSMIT]

NO.	DATE	TIME	DESTINATION	PG.	DURATION	MODE	RESULT
28972	4-24	08:40	9372856404	2	0°01'02"	NORM.E	OK
				2	0°01'02"		

14



State of Ohio Environmental Protection Agency

FERNALD

LOG K-1559

Southwest District Office

401 East Fifth Street
Dayton, OH 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249

MAY 15 8 55 AM '97

George V. Voinovich, Govern
Nancy P. Hollister, Lt. Govern
Donald R. Schregardus, Direc

FILE: 9300
LIBRARY: _____

May 9, 1997

RE: DOE-FEMP
HAMILTON COUNTY
HAZARDOUS WASTE

Mr. Bob Danner
U.S. DOE-FEMP
Office of Environmental Management
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Danner:

This letter is written in response to your faxed request for approval for DOE-FEMP to receive approximately 50 drums of hazardous waste residues from Manufacturing Sciences Corporation (MSC) in Oak Ridge, Tennessee. This waste was generated from an engineering study conducted by MSC on scrap metal originating from the FEMP. DOE-FEMP must receive approval from Ohio EPA prior to receiving any wastes from off-site per the December, 1988 Consent Decree.

Based on information presented in the initial fax and additional information provided in a fax received on May 6, 1997, the Ohio EPA grants approval for DOE-FEMP to receive 54 drums of waste from MSC. DOE-FEMP must comply with all hazardous waste rules applicable to the receipt of this waste.

During initial discussions with you regarding this issue, it appeared that DOE had not explored alternative treatment/disposal options for this waste. (DOE has subsequently submitted information relating to an analysis of alternatives and justification for the return of the residues.) The Ohio EPA understands its obligation to allow for the return of mixed waste treatment residues in order to limit the burden on states that agree to treat waste from Ohio sites. At the same time, the Ohio EPA shares a goal with DOE-FEMP to one day remove all hazardous waste from storage at DOE-FEMP. The return of waste to the FEMP when other more appropriate alternatives exist would be contrary to this goal. Limiting unnecessary return of wastes will also reduce the number of times this material will be handled and transported, thereby reducing the risk associated with these activities. Therefore, the Ohio EPA encourages DOE-FEMP to make every effort to anticipate the generation of mixed waste residues from off-site treatment of wastes, and to determine whether alternatives (such as direct shipment to a TSD) other than the return of these residues to FEMP exist. In order to minimize a possible burden on states that agree to treat waste from Ohio sites, we feel strongly that the evaluation of alternatives should occur expeditiously and prior to the accumulation of treatment residues. The Ohio EPA will continue to consider the return of these residues to FEMP after other alternatives have been evaluated and ruled out.

In light of the concerns expressed above, and in order for future requests of this nature to be processed more expeditiously, the Ohio EPA asks that the following information be included in future requests to receive treatment residuals from off-site.

15