



Department of Energy  
Ohio Field Office  
Fernald Area Office  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



MAR 07 2002

Mr. Gene Jablonowski, Remedial Project Manager  
United States Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0174-02

RECORD

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Jablonowski and Mr. Schneider:

**DISPOSING PREVIOUSLY CONTAINERIZED DEBRIS WASTES IN ON-SITE DISPOSAL FACILITY**

The Fernald Environmental Management Project (FEMP) is planning to evaluate and disposition, via the On-Site Disposal Facility (OSDF), certain inventories of previously containerized debris. The following summary is provided to satisfy requirements in Sections 3.5.2 and 6.4 (Future Ancillary Waste Streams) of the Waste Acceptance Criteria (WAC) Attainment Plan for the OSDF (20100-PL-0014), specific to ancillary waste streams. The summary identifies specific categories of containerized debris and the approach for evaluating acceptability for placement. The debris is very similar to that generated by ongoing Decontamination and Demolition (D&D) projects at the Fernald site. The same restrictions will be placed on debris source and type as required by existing governing regulatory documents (i.e., Operable Unit 3 Record of Decision for Final Remedial Action, Impacted Materials Placement Plan, and WAC Attainment Plan for the OSDF).

Background

After the closure of the Fernald Waste Pits, the FEMP routinely containerized debris wastes to be directed to off-site disposal facilities, such as the Nevada Test Site. These materials originated from a wide variety of activities at the FEMP, but the resulting debris is similar to the debris types being generated from ongoing D&D activities. Example types and activities are provided by the following list:

- Process yard scrap from grounds cleanup campaigns;
- Construction rubble (gravel, concrete, steel) generated from construction or during preparation for construction;

MAR 07 2002

Mr. Gene Jablonowski  
Mr. Tom Schneider

-2-

DOE-0174-02

- Facility fixtures (ductwork, lights, conduit, small equipment, spare parts, etc.) from process upgrades, retrofits, and maintenance;
- Previously utilized and unused waste storage containers (no visible residues, triple-rinsed if held acute hazardous waste);
- Category C debris previously packaged by D&D operations that can be cleaned to meet visual inspection criteria for WAC attainment;
- Asbestos insulation and Asbestos Containing Materials (ACM) removed during maintenance and safe shutdown activities; and
- Property equipment removed from facilities in speculation of future use or beneficial use at other sites.

As with debris from the full-scale D&D activities, these wastes are comprised of masonry, concrete, structural steel, light-gauge steel, ductwork, and other typical debris contents. The practical difference is that these wastes were containerized for storage in anticipation of off-site disposal. The typical process employed to verify WAC compliance for any of the available disposal sites includes removing the waste from containers, sorting to remove non-conforming materials, and inspecting versus applicable WAC requirements for the identified disposal facility.

#### Plan

To achieve WAC compliance for OSDF disposal, the debris wastes will be sorted to remove non-conforming wastes and then inspected to assure conformance with the WAC for the OSDF. To assure waste that is not permitted in the OSDF is not included in the debris sorted to the OSDF disposition path, the site Waste Acceptance Organization (WAO) reviews/approves the waste sources and material types in inventory to be sent to sorting for potential OSDF disposal. The WAO then oversees the sorting process to verify that prohibited articles and material types are not included in debris sorted to the OSDF disposal path. The WAO then approves the waste for transfer. Once WAC attainment has been certified, these wastes will be transported either to the On-Site Disposal Facility Material Transfer Area (OMTA) for bulk staging, staged in Roll-Off Boxes (ROB), or directly hauled to the OSDF for placement, based on the physical characteristics of the debris and the placement schedules of the OSDF project.

Containerized debris in inventory as of October 29, 2001, included 1,082 drums, 224 wood or metal boxes, and 85 ISO containers, and included the following Material Description Codes (MDC):

- 003 (Non-Recoverable Trash),
- 004 (Contaminated Steel, Crushed Drums<sup>+</sup>, Equipment, and Similar Materials),
- 011 (Contaminated Soil\*, Rocks, and Ceramics),
- 027 (Contaminated Rags, Paper, and Polyethylene),

MAR 07 2002

Mr. Gene Jablonowski  
Mr. Tom Schneider

-3-

DOE-0174-02

- 028 (Contaminated Asbestos Materials)
- 603 (Glass from Vitrification, Minimum Additive Waste Stabilization (MAWS))

+ Inspected for WAC prior to crushing

• Soils encountered in this MDC are not included in the debris proposed for OSDF disposal. A number of debris MDCs have been eliminated from this list based on limited volumes and/or inappropriateness for OSDF disposal.

These MDCs included an estimated 2600 cubic yards of debris (based on the maximum volume of the containers listed in inventory) that would potentially meet OSDF WAC. The overall impact of this additional volume to OSDF is insignificant, as it represents about 1/10 of 1% of the total volume and because actual volume of debris placed would be much less than the volume associated with the original containers in inventory, due to the void spaces associated with containerized waste of this type.

Consistent with the Operable Unit 3-derived debris WAC for the OSDF, the following wastes (based on type, source, or properties) would not be eligible for placement.

Debris excluded based on source:

- Highly elevated direct radiation field materials from Silos

Debris excluded based on type/property:

- Pressurized gas cylinders,
- Process-related metals not meeting OSDF visual criteria,
- Untreated lead sheeting,
- Materials containing free liquids,
- Intact drums,
- Materials with large void space,
- Acid brick, and
- Scrap tires

Disposal of the conforming debris in the OSDF will significantly reduce waste disposal costs and can be completed faster than packaging and shipping to off-site disposal. Initial debris sorting for OSDF placement is scheduled to begin in March 2002.

If you have any questions or require additional information, please contact John Sattler of my staff at (513) 648-3145.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Sattler

MAR 07 2002

Mr. Gene Jablonowski  
Mr. Tom Schneider

-4-

DOE-0174-02

## cc:

R. Greenberg, EM-31/CLOV  
N. Hallein, EM-31/CLOV  
A. Tanner, OH/FEMP  
J. Saric, USEPA-V, SRF-5J  
F. Bell, ATSDR  
M. Schupe, HSI GeoTrans  
R. Vandegrift, ODH  
F. Hodge, Tetra-Tech  
J. Buckley, Fluor Fernald, Inc./MS52-3  
D. Carr, Fluor Fernald, Inc./MS2  
J. D. Chiou, Fluor Fernald, Inc./MS64  
T. Clark, Fluor Fernald, Inc./MS52-3  
T. Hagen, Fluor Fernald, Inc./MS65-2  
S. Lorenz, Fluor Fernald, Inc./MS52-5  
T. Poff, Fluor Fernald, Inc./MS65-2  
T. Walsh, Fluor Fernald, Inc./MS46  
AR Coordinator, Fluor Fernald, Inc./MS78  
ECDC, Fluor Fernald, Inc./MS52-7