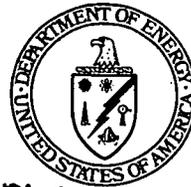




## Department of Energy

Ohio Field Office  
Fernald Area Office

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



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NOV 27 2000

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

DOE-0125-01

Dear Mr. Pardi:

### RE-ESTABLISHMENT OF HAZARDOUS WASTE STORAGE AREA IN PILOT PLANT WAREHOUSE (BUILDING 68)

Reference: Letter, J. Reising, DOE-FEMP to P. Pardi, OEPA, "Decontamination and Dismantlement of Hazardous Waste Storage Area in the Pilot Plant Warehouse (Building 68)," dated July 29, 1997

This letter serves as notification of the Fernald Environmental Management Project's (FEMP) intent to re-establish the diked area in the Pilot Plant Warehouse (Building 68), Hazardous Waste Management Unit (HWMU) #33 for the storage of containers of hazardous waste. As discussed in October 25, 2000, and November 6, 2000, telephone conversations with Phil Harris of the Ohio Environmental Protection Agency (OEPA), recent characterization efforts have identified a population of approximately 50 containers of samples that have been characterized as hazardous waste. These are primarily environmental media samples and samples from the Organic Extraction Project that are currently being stored in Building 68. Since many of these samples are liquids contained in glass jars, they require storage in a heated building. Building 68 is the best option for storing these samples since the other buildings identified in the FEMP's Resource Conservation and Recovery Act (RCRA) Part B Permit Application are unheated (Building 79, Tension Support Structures), or are currently occupied by Nuclear Materials Disposition Operations (Buildings 56 and 80).

Building 68 is a pre-engineered metal building covered by a metal roof. The floor of the building consists of 8-inch thick, reinforced concrete. Containers of hazardous waste had previously been stored in a Herculite-diked area located in the center of the building. Although this area was decontaminated and dismantled in 1997 (Reference), the building has been retained in the FEMP's RCRA Part B Permit Application should it happen that the hazardous waste storage capacity was needed at a later date. A map indicating the location of Building 68 is provided as an enclosure.

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Mr. Paul Pardi

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In order to prepare the building for hazardous waste storage, a containment system consisting of Herculite diking will be constructed in Building 68. The diking will be capable of containing a minimum of 10% of the maximum storage volume of hazardous waste with free liquids and 25% of the maximum storage volume of Polychlorinated Biphenyl (PCB) containers. Containers of samples characterized as D001-ignitable will be stored in accordance with National Fire Protection Association (NFPA) standards. Spill response equipment will be maintained in Building 68 in accordance with the FEMP's RCRA Part B Permit Application and weekly inspections will be conducted of the unit.

In addition, there are approximately 150 containers of samples for which there is currently insufficient information available to complete the characterization. The FEMP will stage these containers within the Herculite-diked area in Building 68. Further evaluation and characterization of these samples are planned to occur as part of the Sample Disposition Project. Under this project, containers of samples will be inventoried, segregated based on their characterization/compatibility, and consolidated for final disposition. This activity is scheduled to begin in Fiscal Year (FY) 2001.

Construction of the diked area in Building 68 will be completed by December 15, 2000. Revisions to the FEMP's RCRA Part A/B Permit Application to address the storage of hazardous waste in Building 68 will be provided to the OEPA by January 31, 2001. Revisions to the FEMP's RCRA Contingency Plan will also be transmitted to off-site emergency organizations to address the storage of hazardous/ignitable waste in Building 68.

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

Sincerely,

  
Stephen H. McGracken  
Director

FEMP:Kaster

Enclosure

cc w/enclosure:

J. Reising, OH/FEMP

J. Sattler, OH/FEMP

M. Kopp, Fluor Fernald, Inc./52-3

T. Poff, Fluor Fernald, Inc./65-2

AR Coordinator, Fluor Fernald, Inc./78

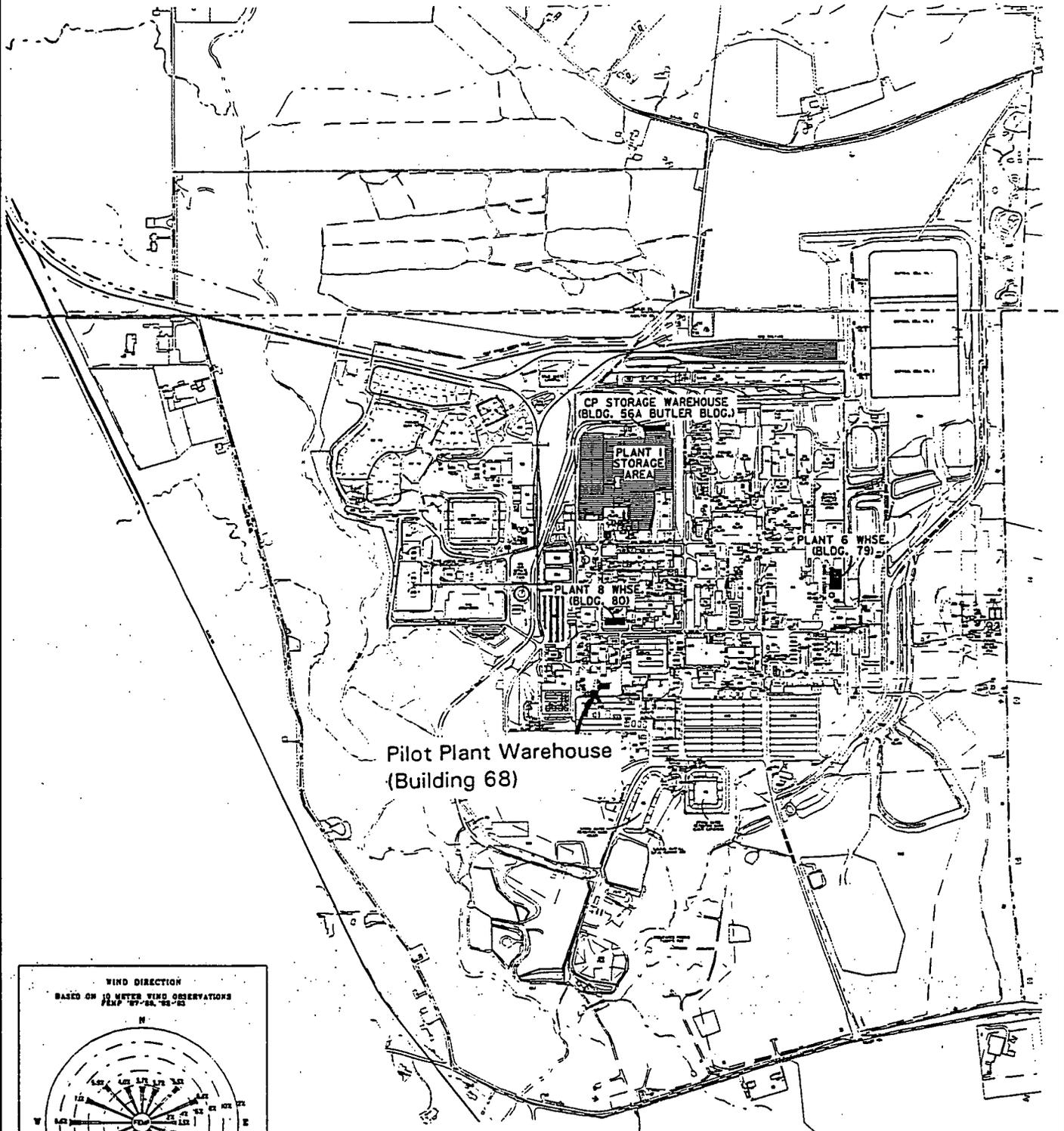
ECDC, Fluor Fernald, Inc./52-7

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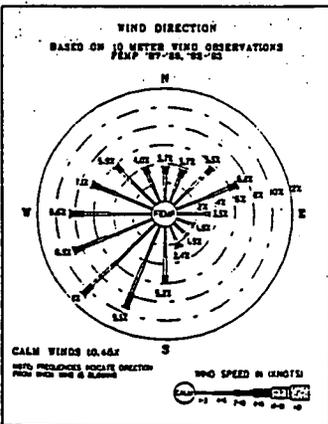
A. Tanner, OH/FEMP

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Pilot Plant Warehouse  
(Building 68)



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REVISIONS NO. DATE BY APPR.		PLANT 8 WHSE PERMITS & EPC DRAWING DO NOT REMOVE MATERIALS	PERFORMANCE CRITERIA 1 2 3 4 5	Fernald Environmental Management Project FERNALD'S U.S. DEPARTMENT OF ENERGY	RCRA PART 6 PERMITTED RCRA STORAGE UNITS FIGURE D-1 SCALE: 1" = 300'-0"
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