



Department of Energy

Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246
(513) 648-3155



OCT 14 2004

Mr. Paul Pardi
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

DOE-0013-05

Dear Mr. Pardi:

**REVISION 9.1 OF THE FERNALD CLOSURE PROJECT'S RESOURCE
CONSERVATION AND RECOVERY ACT PART B PERMIT APPLICATION**

Enclosed for your review and approval are a revised Section F (Procedures to Prevent Hazards) and Section G (Contingency Plan) of the Fernald Closure Project's (FCP) Resource Conservation and Recovery Act (RCRA) Part B Permit Application (Revision 9.1). Note that, as per discussions with Ohio Environmental Protection Agency (OEPA) in a September 21, 2004 meeting, this will be the last revision of the Contingency Plan that will be provided to off-site emergency organizations due to the difficulties involved in keeping these copies current as remediation proceeds at the FCP. The FCP will maintain an updated copy of the Contingency Plan at the Security Check Point at the south entrance to the facility. This copy will be made available to off-site emergency response personnel in the event of an emergency. Section F has been revised primarily to include requirements for staging mixed waste containers in the Trailer Staging Area.

Changes to these sections have been made using redlines and strikeouts to assist in reviewing. A summary of these revisions is provided as an enclosure.

If you have any questions, please contact Ed Skintik at (513) 246-1369.

Sincerely,

for William J. Taylor,
Director

FCP:Skintik

OCT 14 2004

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Mr. Paul Pardi

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DOE-0013-05

cc w/enclosure:

P. Allen, OEPA-Columbus

D. Ullrich, USEPA-V

AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

T. Koch, OEPA-Dayton

J. Saric, USEPA-V, SR-6J

T. A. Schneider, OEPA-Dayton

E. Brucken, Fluor Fernald, Inc./MS53-2

RCRA Operating Record/MS65-2

ENCLOSURE
SUMMARY OF CHANGES TO THE FERNALD CLOSURE PROJECT'S RCRA PART B
PERMIT APPLICATION (REVISION 9.1)

SECTION F – PROCEDURES TO PREVENT HAZARDS

- 1) This section has been revised to remove references to the Plant 6 Warehouse (Building 79) since this building is scheduled for remediation and will no longer be used for the storage of hazardous waste.
- 2) Section F-4a (Prevent Hazards in Loading/Unloading Operations) has been revised to: 1) remove references to Building 77 for staging mixed waste containers since this building has been demolished; 2) add information regarding the operation of the Trailer Staging Area; and 3) update information regarding the current and future location of the Clean-Side Hazardous Waste Storage Lockers.

SECTION G – CONTINGENCY PLAN

- 1) References to the Plant 6 Warehouse (Building 79), Finished Products Warehouse (Building 77), Liquid Mixed Waste Project Bulk Tanks and Quonset Hut #1 (Building 60) have been removed from the Contingency Plan since these buildings are being remediated and will no longer be used to manage hazardous waste.
- 2) The Trailer Staging Area and the Boiler Plant (Building 93A) have been added to this section as areas that the FCP is using to manage containers of hazardous waste. In addition, information regarding all of the hazardous waste lockers has been updated to reflect both the current and future locations of these lockers.
- 3) A paragraph has been added to the beginning of the Contingency Plan stating that a current copy of the Contingency Plan will be maintained at the Security Check Point at the south entrance to the facility and will be available to off-site responders in the event of an emergency (as discussed in a September 21, 2004 meeting with Ohio Environmental Protection Agency).
- 4) Section G-1 (General Information) has been revised to update the site mailing address for DOE. Information regarding on-site emergency response equipment, alternate locations for the Emergency Operations Center and responsibilities for testing alarm systems has also been updated in Section G-5 (Emergency Support and Equipment). Section G-6 (Coordination Agreements) has been revised to remove a reference to quarterly meetings with off-site emergency organizations.

- 5) Table G-1 (Emergency Operation Personnel & Organizations), Table G-2 (the FCP Emergency Organization Roster), Figure G-3.1 (Training and Participation Requirements), and Figure G-7 (Activation Methods for All Elements of the Emergency Response Organization) have been updated to reflect organizational changes.