

MARTIN MARIETTA

**RESOURCE CONSERVATION AND
RECOVERY ACT (RCRA)
PART B PERMIT APPLICATION
FOR
PRODUCTION ASSOCIATED UNITS
AT THE OAK RIDGE Y-12 PLANT**

Building 9206 Container Storage Unit
Building 9212 Container Storage Unit
Building 9720-12 Container Storage Unit
Cyanide Treatment Unit

Environmental Management Department

Health, Safety, Environment, and
Accountability Organization

September 1994

Prepared by
Oak Ridge Y-12 Plant
Oak Ridge, Tennessee 37831
Managed by
MARTIN MARIETTA ENERGY SYSTEMS, INC.
for the
U.S. DEPARTMENT OF ENERGY
under contract DE-AC05-84OR21400
CS

MANAGED BY
MARTIN MARIETTA ENERGY SYSTEMS, INC.
FOR THE UNITED STATES
DEPARTMENT OF ENERGY

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September 1994

Y/TS-838/R3

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MARTIN MARIETTA ENERGY SYSTEMS, INC.

POST OFFICE BOX 2009
OAK RIDGE, TENNESSEE 37831

September 22, 1994

Mr. R. J. Spence
Department of Energy, Oak Ridge Operations
Post Office Box 2001
Oak Ridge, Tennessee 37831

Dear Mr. Spence:

**Notice of Deficiency (NOD) Response--Resource Conservation and Recovery Act (RCRA)
Part B Permit Application for the Production Associated Units at the Oak Ridge Y-12 Plant**

In reference to the letters dated July 14, 1994, "Notice of Deficiency, RCRA Part B Permit Application," and August 30, 1994, "Notice of Deficiency--Response Extension, RCRA Part B Permit Application," from the Tennessee Department of Environment and Conservation (TDEC) personnel, Enclosure 1 is a summary of the responses of the Y-12 Plant personnel to each of the TDEC comments listed in the subject NOD. Enclosure 2 is a revised and complete permit application entitled "Resource Conservation and Recovery Act Part B Permit Application for the Production Associated Units at the Oak Ridge Y-12 Plant," Document Y/TS-83

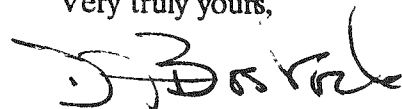
Mr. R. J. Spence, DOE-ORO

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September 22, 1994

Please direct any questions or comments to B. E. Skaggs at (615) 241-2582.

Very truly yours,



D. J. Bostock
Vice President and
Y-12 Plant Manager

Enclosures: As Stated

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File-EMD-RC

Enclosure 1
Letter, Bostock to Spence
Dated: September 22, 1994

LETTER TITLE

Notice of Deficiency (NOD) Response--Resource Conservation and Recovery Act (RCRA)
Part B Permit Application for the Production Associated Units at the Oak Ridge Y-12 Plant

Notice of Deficiency
U.S. DOE Y-12 Plant
EPA ID: TN3 89-009-0001
Part B Permit Application
Dated, May 1992

1. "40 CFR 270.14(b)(2) as incorporated by reference at Tennessee Rule 1200-1-11-.07(5)(a) requires a basis for the hazard designation the wastes in these facilities will receive. A laboratory report on analysis results is also required. The application states, 'These data are considered classified for reasons of national security and can be made available for review by "Q" cleared regulatory personnel.' An employee with this clearance will review the hazard designation and the classified laboratory reports at a later date. Although 'Q' cleared personnel will review the classified information, all unclassified laboratory report results should be submitted along with your Part B application."

Response: Analytical data will be available to Q-cleared regulatory personnel. Typical unclassified analytical data is included in Appendix C-1.

2. "40 CFR 264.175(b) as incorporated by reference at Tennessee Rule 1200-1-11-.06(9)(a) requires the following information pertaining to basic design parameters, dimensions, and materials of construction:
 1. Buildings 9206, 9212, and 9720-12
 - a. Statement that the bases are free of cracks and gaps.
 - b. Engineering evaluation of structural integrity of base.
 - c. Discussion of compatibility of base with the wastes.
 - d

Response: The quoted citation does not require completed blueprints. Such drawings are not available. However, as requested in a telephone conversation with Ms. Jamie Burroughs of the Tennessee Department of Environment and Conservation, additional detail has been added to the plan drawings presented in Appendix D to assist in the evaluation of the units.

4. "40 CFR 264.193(a)-(f) as incorporated by reference Tennessee Rule 1200-1-11-.06(10)(a) includes certain requirements for the plans and description of design, construction, and operation of the secondary containment system. These include:
 1. Proof that the materials are compatible with the wastes in the tank system.
 2. Show system has sufficient strength and thickness to prevent failure caused by any of the following:
 - a. pressure gradients (including static head and external hydrological forces).
 - b. physical contact with the wastes.
 - c. climatic conditions.
 - d. stress of daily operation (including stresses from nearby vehicular traffic).
 3. Calculations to prove that it is placed on a foundation or base that is capable of providing support, resisting pressure gradients above and below the system, and preventing failure due to settlement, compression or uplift."

Response: This comment regarding tank systems is no longer applicable since the Uranium Treatment Unit has been removed from the revised permit application. A closure plan is being prepared for the Uranium Treatment Unit.

5. "40 CFR 264.193(d)-(e) as incorporated by reference Tennessee Rule 1200-1-11.06(10

2. Calculations proving that the secondary containment system is placed on a foundation or base that is capable of providing support, resisting pressure gradients above and below the system, and preventing failure due to settlement, compression, or uplift.
3. Show that the system has sufficient strength and thickness to prevent failure caused by any of the following:
 - a. pressure gradients (including static head and external hydrological forces).
 - b. physical contact with the wastes.
 - c. climatic conditions.
 - d. stress of daily operation (including stresses from nearby vehicular traffic)."

Response: These comments regarding tank systems are no longer applicable since the Uranium Treatment Unit has been removed from the revised permit application. A closure plan is being prepared for this unit.

7. "40 CFR 264.195(c) as incorporated by reference Tennessee Rule 1200-1-11.06(10)(a) requires a schedule and procedure for inspecting a cathodic protection system if one is present at the facility. If one is not present at the facility please discuss why the cathodic protection system is not needed."

Response: These comments regarding tank systems are no longer applicable since the Uranium Treatment Unit has been removed from the revised permit application. A closure plan is being prepared for this unit.

8. "40 CFR 264.15(a)-(b) as incorporated by reference Tennessee Rule 1200-1-11.06(2)(a) specifies that certain equipment, if present at the facility, must

9. "40 CFR 264.15 as incorporated by reference Tennessee Rule 1200-1-11.06(2)(a) specifies requirements for tank system inspection. These include:

1. Must have a procedure for emptying a tank to allow entry and inspection when necessary to detect corrosion or erosion of tank sides and bottom.
2. Must confirm proper orientation of cathodic protection system (if present) within six months after installation and a least annually thereafter."

Response: These comments regarding tank systems are no longer applicable since the Uranium Treatment Unit has been removed from the revised permit application. A closure plan is being prepared for this unit.

10. "40 CFR 264.15(d) as incorporated by reference Tennessee Rule 1200-1-11.06(2)(a) specifies requirements for the inspection log. These include:

1. Container inspection log
 - a. The area that is to be inspected must be clearly labeled on the log sheet.
 - b. The title 'Interim Status Facility' must be deleted.
 - c. The inspection log needs to have an 'observation' section and a 'date and nature of repairs and remedial action' section. For an example look at the inspection log for your tanks.
 - d. Please define all-weather surface in the standard that states, 'containers of waste shall be placed on an all-weather surface' (S-02).
 - e. Problems, besides those listed, relating to container structural integrity need to

Response: The inspection schedule and inspection logs have been revised to include the applicable items listed above. This updated information is located in Appendices F-1 and F-2 of the revised permit application.

11. "40 CFR 264.50 through 40 CFR 264.56 as incorporated by reference Tennessee Rule 1200-1-11.06(4)(a) requires that Section G, the contingency plan section, be self contained in one portion of the application. Appendixes G-1 through G-4 need to be merged into Section G."

Response: The contingency plan has been revised to be a self-contained document. This revised plan is included as part of the revised permit application.

BESkaggs:krl
September 19, 1994

Enclosure 2
Letter, Bostock to Spence
Dated: September 22, 1994

LETTER TITLE

Notice of Deficiency (NOD) Response--Resource Conservation and Recovery Act (RCRA)
Part B Permit Application for the Production Associated Units at the Oak Ridge Y-12 Plant

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LIST OF ACRONYMS

CFR	Code of Federal Regulations
COD	chemical oxygen demand
CWSA	Containerized Waste Storage Area
DARA	Disposal Area Remedial Action
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
EOC	Emergency Operations Center
EPA	U.S. Environmental Protection Agency
HP	Health Physics
HSWA	Hazardous and Solid Waste Amendments
IH	Industrial Hygiene
IRWTA	Interim Reactive Waste Treatment Area
LDR	Land Disposal Restrictions
MMES	Martin Marietta Energy Systems, Inc.
NaK	sodium potassium
OJT	On-The-Job Training
ORNL	Oak Ridge National Laboratory
ORR	Oak Ridge Reservation
OSHA	Occupational Safety and Health Act
PED	Plant Emergency Director
PCB	polychlorinated biphenyl
PSS	Plant Shift Superintendent
RCRA	Resource Conservation and Recovery Act
SARA	Superfund Amendments Reauthorization Act
SID	Stream Identification

SECTION B

FACILITY DESCRIPTION

This section of the application provides a general description of the hazardous waste management facility as required by 40 CFR Part 270.14(b)(1) and Rules Governing Hazardous Waste Management in Tennessee, Rule 1200-1-11-.07(5)(a). This description is intended to provide guidance and facility orientation to the permit application reviewer and the permit writer for the Oak Ridge Y-12 Plant.

B-1 GENERAL DESCRIPTION

The Oak Ridge Y-12 Plant was built by the U.S. Army Corps of Engineers in 1943 as part of the Manhattan Project and was given the original mission to separate the fissionable isotope of uranium by the electromagnetic process. After World War II, the electromagnetic separation process was discontinued in favor of the more economical gaseous diffusion process. In recent years the Y-12 Plant staff has developed this facility into a highly sophisticated manufacturing and developmental engineering organization.

The U.S. Department of Energy (DOE) owns and operates the Y-12 Plant. Personnel from Martin Marietta Energy Systems, Inc., (Energy Systems) co-operate and manage the Y-12 Plant. Since 1984, the facility has been managed by Energy Systems personnel under a prime contract with DOE. The contract is administered by personnel at the DOE, Oak Ridge Operations Office.

The Y-12 Plant occupies approximately 800 acres in Anderson County, Tennessee

storage of nuclear materials, manufacture of nuclear materials, manufacture of components for the defense capabilities of the nation, support to national security programs, and services provided to other customers as approved by DOE.

This application covers a treatment unit with a container storage area and three other container storage areas. These units can be located on Map 2 in Appendix B-1. The four units included in this application are as follows:

1. Building 9206 Container Storage Area
2. Building 9212 Container Storage Area
3. Building 9720-12 Classified Container Storage Area
4. Cyanide Treatment Unit

All four of these units are associated with the recovery of enriched uranium and other metals from wastes generated during the processing of nuclear materials.

Building 9206 Container Storage Area

Building 9206 is one of two buildings at the Y-12 Plant that process enriched uranium-bearing materials, including organic solutions, for recovery of the uranium. Residues were generated during past recovery processes in which solid wastes, such as gloves, shoe scuffs, lab coats, etc., that were contaminated with enriched uranium, were burned. The resulting residue or ash is now stored for future recovery of the uranium contained in the ash. The ash is classified as a mixed (hazardous and radioactive) waste due to the presence of F-listed solvents in the original solid waste.

Also stored in Building 9206 are organic solutions and lab salvage,

Also stored in Building 9212 are organic solutions and lab salvage, such as phosphoric acid, Freon, etc., containing enriched uranium. These wastes are characterized as mixed waste due to the presence of F-listed solvents and the characteristics of toxicity and corrosivity. The areas have a total storage capacity of 3,814 gallons.

Building 9720-12 Classified Container Storage Area

Building 9720-12 is a storage area for hazardous, low-level radioactive, and mixed waste. Waste is stored at this building until appropriate recycle techniques can be scheduled. Wastes stored at this facility are contaminated with enriched uranium. Total storage capacity of Building 9720-12 container storage area is 32,500 gallons.

Cyanide Treatment Unit

The Cyanide Treatment Unit is located in Building 9201-5N in the northwest corner of the building's basement. The cyanide treatment--or destruction--operation consists of a cyanide treatment exhaust hood and a drum storage area which can store up to 2,200 gallons.

At present, the treatment process takes place in DOT-approved, plastic-lined drums. Drums of waste are placed under the cyanide treatment hood where the treatment takes place. The treatment capacity of the Cyanide Treatment Unit is 195 gallons per day.

B-2 TOPOGRAPHIC MAP

vehicular check points. The plant access roads as well as internal roads are also shown on this map. (Scale: 1 inch = 400 feet).

Map 2: The Oak Ridge Y-12 Plant Waste Unit Identification Key illustrates the storage, treatment, and disposal facilities located at the Y-12 Plant. Due to the large number of these facilities, a separate map has been used to give the permit writer and reviewer a clearer understanding of the locations of these facilities. (Scale: 1 inch = 800 feet).

Map 3: The Y-12 Plant Loading and Shipping Docks Map illustrates the loading and unloading docks and shipping docks around the plant. (Scale: 1 inch = 400 feet).

Map 4: The Y-12 Plant Floodplain Map shows the East Fork Poplar Creek 100-year floodplain and the surrounding surface waters. The 500-year floodplain and maximum probable flood is also shown for the Y-12 Plant. The four units in this package are not located within the 100-year floodplain of either Bear Creek or East Fork Poplar Creek. Flood control and drainage barriers are, therefore, not necessary. (Scale: 1 inch = 400 feet).

Maps 5 & 6: Y-12 Plant Sanitary Sewer System Master Plan and Y-12 Plant Storm Sewer Master Plan Maps. These maps illustrate the sanitary sewer system and the detailed storm water drainage system for the Y-12 Plant. (Scale: Sanitary Sewers - 1 inch = 530 feet, Storm Sewers - 1 inch = 200 feet).

A variance under Tennessee Rule 12

- Wind rose - Appendix B-2 includes information provided by wind roses taken from the data gathered from the two meteorological towers located at the east and west end of the plant.
- Injection and withdrawal wells. Not applicable. There are no injection wells or withdrawal wells at the facility. Therefore, there are none shown on the permit maps.
- Land Use. The surrounding land use around the Y-12 Plant is primarily wooded forest with some commercial development east of the plant.
- Loading and unloading areas. The loading and unloading areas for the container storage and treatment areas in this application are illustrated on Map 3 and also in the facility drawings referenced in Section D.

B-2b Additional Topographic Requirements for Land Storage, Treatment and Disposal Facilities and Post Closure Permits for Closed Land Units.

Not Applicable. None of these four units are hazardous waste land storage, treatment, or disposal units. Additional topographic information is not required of these hazardous waste management units in order to comply with the permit application regulations.

B-3 LOCATION INFORMATION

The locations of the four units in this permit application at the Y-12 Plant are illustrated in Map 2 of Appendix B-1. The specific identifying key numbers are summarized in Section B-1.

B-3a Seismic Considerations

B-4 TRAFFIC INFORMATION

The Y-12 Plant is a major industrial type facility operated under contract to the U.S. Department of Energy. The road system and its construction are typical of an industrial complex or military facility with numerous production, storage, administrative, maintenance, and utility buildings. These roads can easily bear the weight of the waste hauling vehicles used for each hazardous waste management unit. Roads are mostly two-way and built of asphalt to accommodate heavy and light traffic including automobiles, light trucks, armored security vehicles, heavy trucks, and tractor trailers (including those used to move nuclear material). There are also some constructed gravel roads capable of carrying the intended traffic. Entry and exit are controlled by guarded, locked gates. Internal traffic is controlled by marked lanes and stop signs at intersections typical of municipal or industrial complex surface streets. Hazardous wastes transported within the Plant or off-site generally consist of dump truck loads of soils and drums on pallets, and may periodically include tanker loads of liquids such as oils.

The minimum requirement for construction of existing paved roads at Y-12 is 1.5 to 14.0 inches of asphaltic concrete pavement overlaid on 6.0 to 18.0 inches of compacted aggregate base. All new paved roads are constructed with a minimum of 1.5 inches of asphaltic concrete pavement overlaid on 8.0 inches of stabilized aggregate base course. All paved roads to be used for access to and exit from hazardous waste management unit areas are capable of bearing loads up to allowable state highway limitations.

Building 9206 Container Storage Area

Access to Building 9206 is from First Street at the north entrance of the facility. The building is located at the intersection of E Road and First Street. These streets are typical paved streets and meet the minimum requirements as specified for a Y-12 Plant paved road. These roads are capable of handling traffic associated with the servicing of this facility.

Building 9212 Container Storage Area

Access to Building 9212 is from G Street on the west side of the facility. The facility is just south of Bear Creek Road in the protected area. G Street is designed to meet the minimum construction requirements as specified for paved roads at the Y-12 Plant. The street is capable of handling the anticipated traffic associated with the servicing of this unit.

Building 9720-12 Classified Container Storage Area

Building 9720-12 is located on Second Street at the intersection with K Road. All these roads are paved roads and are designed and constructed to meet the minimum requirements for the Y-12 Plant paved roads. These roads are capable of handling the associated traffic necessary to service this unit.

Cyanide Treatment Unit

The Cyanide Treatment Unit is housed

SECTION C

WASTE CHARACTERISTICS

This section of the application describes the chemical and physical nature of the hazardous wastes handled and stored in each of the following storage and treatment units:

1. Building 9206 Container Storage Area
2. Building 9212 Container Storage Area
3. Building 9720-12 Classified Container Storage Area
4. Cyanide Treatment Unit

This section also includes the waste analysis plan for sampling, testing, and evaluating the waste to assure that sufficient information is available for proper waste management. This information is submitted in response to the RCRA Part B Permit application requirements, as specified in 40 CFR Part 270.14(b)(2); and in Rules Governing Hazardous Waste Management in Tennessee, Rule 1200-1-11-.07(5)(a)2.

C-1 CHEMICAL AND PHYSICAL ANALYSIS

General Description

Cyanide Treatment Unit

The Cyanide Treatment Unit provides storage and treatment of liquid waste solutions of metallic cyanide compounds from spent plating baths and other cyanide solutions. The pH of the cyanide wastes ranges from 5 to 11. The total cyanide concentration of untreated cyanide wastes ranges from 10 to 60,000 ppm. Typically, wastes generated on-site are received and treated in 55-gallon plastic lined drums. These wastes are characterized as mixed (hazardous and radioactive) wastes. Occasionally, cyanide-bearing wastes, generated off-site, may be treated at the Cyanide Treatment Unit.

Hazardous Characteristics

The storage and treatment units receive and treat only the following listed and characteristic wastes as defined in 40 CFR Part 261:

Building 9206 Container Storage Area	F001, F002, F005, D004 - D043
Building 9212 Container Storage Area	F001, F002, F005, D004 - D043
Building 972	

TABLE C-1. TYPICAL TYPES OF WASTE STORED AND/OR TREATED

Location	Example⁽¹⁾	Parameter	EPA Waste Code⁽²⁾
9206 and 9212	Ash, solutions	Halogenated and non-halogenated solvents, TCLP metals	F001, F002, F005 D004 - D043
9720-12	Ash and solid combustible material	Halogenated and non-halogenated solvents, TCLP metals	F001, F002, F005 D004 - D043
Cyanide Treatment Unit	Spent plating solutions, cyanide solutions	Cyanide and TCLP metals	D002 - D011, F001, F007 - F012, P029, P030, P033, P098, P104, P106

⁽¹⁾ All of these wastes could potentially be contaminated with enriched or depleted uranium.

⁽²⁾ No other waste codes are processed at these units.

C-1a Containers

Buildings 9206 and 9212 Container Storage Areas

Buildings 9206 and 9212 Container Storage Areas provide storage for mixed waste residues or ash. This ash resulted from the burning of solvent- and uranium-contaminated solid wastes. This ash does not contain free liquids and is considered a mixed waste. The containers holding the ash are made of galvanized tin and are typically 7 inches in diameter and 14 inches in height. Each can will hold approximately 2 gallons of residue. Each of the cans has a lid that slides down over the sides of the can. The seam between the lid and the side is then taped to prevent opening and the can is labeled with a recycle batch card, for uranium accountability, and a hazardous waste tag (UCN-2114A)(see Appendix C-2). The can is then placed, single-stacked, on a steel shelf with adequate spacing to prevent criticality. The shelves are normally 3 to 7 racks high with 6 to 11 cans on each shelf. Movement of all cans to and from the storage racks is done by hand. The cans are compatible with the residues being stored.

Uranium-bearing solutions generated during the uranium recovery process and during laboratory analysis are also stored in these areas. These solutions are considered mixed waste and are being stored prior to further uranium recovery. The solutions are stored

waste tags. All containers of hazardous waste are labeled with the words "Hazardous Waste."

Cyanide Treatment Unit

Cyanide wastes from on-site generators typically arrive, are stored, and can be treated in DOT-specification 55-gallon, plastic-lined drums. These containers are compatible with the wastes stored in them. The drums can be stored in the adjacent storage area. All drums of hazardous waste are labeled with the words "Hazardous Waste" (typically UCN-2114A). After treatment, if the cyanide levels are less than 10 ppm, the drums are shipped to the West End Treatment Facility.

Occasionally, cyanide waste may be received from off-site generators. Containers received from off-site must be in the appropriate DOT-specification container which are compatible with the waste stored in them.

The specific parameters to be used for the proper management of the stored and treated wastes is the concentration of enriched uranium. The Cyanide Treatment Unit is an exception, since the concentration of cyanide is the major concern. Other considerations at these units include the presence of F-listed solvents and TCLP metals based on process knowledge. Specific P-listed and characteristic wastes defined in Section C-1 are also of concern at the Cyanide Treatment Unit. The safe handling of waste is of primary importance. Handling

C-1d Surface Impoundments

Not applicable. The units covered in this permit application are not surface impoundments; therefore, the requirements of this section do not apply.

C-1e Incinerators

Not applicable. The units covered in this permit application are not incinerators; therefore, the requirements of this section do not apply.

C-1f Landfills

Not applicable. The units covered in this permit application are not landfills; therefore, the requirements of this section do not apply.

C-1g Land Treatment

Not applicable. The units covered in this permit application are not land treatment facilities; therefore, the requirements of this section do not apply.

C-1h Additional Requirements for Land Storage, Treatment,

Cyanide Treatment Unit

The cyanide waste solutions are generated in plating shops and other Y-12 Plant operations. On occasion, cyanide waste solutions may be received from off-site. These solutions are transported in compatible, DOT-specification containers to the Cyanide Treatment Unit where the cyanide is decomposed prior to further treatment. All drums of untreatable cyanide solutions are tested using the Prussian Blue Test.

After cyanide decomposition, each drum is sampled and analyzed for free cyanide, total cyanide, and cyanate concentrations to verify the effectiveness of treatment. Treated wastes found to have a cyanide concentration of 10 ppm or below are sent to the West End Treatment Facility. Treated waste with a cyanide concentration greater than 10 ppm is processed in the treatment unit again. Treated cyanide solutions are typically analyzed for the parameters shown in Table C-2 as part of the waste analysis plan for any wastes to be treated at West End Treatment Facility.

The cyanide solutions treated at this facility are not ignitable liquids.

C-2b Test Methods

The analytical methods are summarized in Table C-3.

**TABLE C-2. TYPICAL ANALYTICAL PARAMETERS FOR
TREATED CYANIDE SOLUTIONS**

pH	
Nitrates	
TOC	
U	Cl
	Total residual Cl
	F
As	PCB
Ba	Phosphates
Cd	Sulfates
Cr	Cyanide
Pb	COD
Hg	Suspended solids
Se	Dissolved solids
Ag	Alkalinity (as CaCO ₃)
	Acidity
Cl hydrocarbons	Density
Al	Alpha activity
B	Beta activity
Be	Gamma activity
Ca	
Ce	Methylene chloride
Co	Methyl chloroform
Cu	Trichloroethylene
Fe	Perchloroethylene
Ga	

TABLE C-3. TEST METHODS FOR PRODUCTION ASSOCIATED WASTES*

Analyte	Analytical Method
Uranium	2100
TCLP	1311
Volatile organics	5030, 8740
Semi-volatile organics	8250, 8270
Aqueous phase pH	9040

* Methods referenced from "Test Methods for Evaluating Solid Waste" (SW-846)

TABLE C-4. SAMPLING EQUIPMENT FOR PARTICULAR WASTE TYPES^a

Waste Type	Waste location or container							
	Drum	Sacks and bags	Open-bed truck	Closed-bed truck	Storage tanks or bins	Ponds, lagoons and pits	Conveyor belt	Pipe
Moist powders or granules	Trier	Trier	Trier	Trier	Trier	Trier	Shovel	Dipper
Dry powders or granules	Thief	Thief	Thief	Thief	Thief	Trier	Shovel	Dipper
Sand or packed powders and granules	Auger	Auger	Auger	Auger	b	b	Dipper	Dipper
Large-grained solids	Large trier	Large trier	Large trier	Large trier	Large trier	Large trier	Trier	Dipper

Sample Handling:

Once the sample is transferred to the sample container, the lid is closed tightly and taped closed. The exterior of the sample container is washed, dried, and a sample identification tag attached. At a minimum, the tag identifies the sample, the sample location, time of sample, sampler, preservatives, and a unique sample identification number. The sample containers are placed in a plastic bag, tied closed, and placed in a sample ice chest with ice or equivalent. An analytical request form and chain-of-custody form will accompany the sample to the laboratory. The analytical request form identifies the sample number with the tag that is affixed to the sample container(s).

Reporting:

All analytical results, generator information, and sample chain-of-custody documentation will be maintained in the operating record.

C-2d Frequency of Analysis

Buildings 9206, 9212, and 9720-12 Container Storage Areas

C-2e Additional Requirements for Waste Generated Off-Site
Cyanide Treatment Unit

The generator will be responsible for supplying all information required for each parameter identified by this waste analysis plan. No waste will be accepted into these units until all the required information has been adequately provided.

In order to minimize the exposure of personnel to radiation and hazardous wastes, the containers of waste will not be routinely resampled for the purpose of complying with the waste analysis requirements. Chain-of-custody seals will be used to ensure that the wastes have not been tampered with after sampling by the generator. The chain-of-custody procedures for shipping and receiving off-site generated wastes include the following:

- The generator will sample and analyze the wastes for verification parameters specified in Table C-2 prior to shipping the waste to the Cyanide Treatment Unit.
- Immediately after sampling, the waste container will be sealed by the generator and a chain-of-custody seal will be affixed to the container, with the identification number of the chain-of-custody seal recorded on the waste analysis sheet.
- The manifest will be given to the transporter. The transporter and generator will check the identification number on the chain-of-custody seal with the number recorded on the waste analysis sheet to ensure that they are the same. Both the generator and transporter will check, sign, and date the manifest

site operating records. The waste will not be off-loaded during resolutions of the discrepancies and if the discrepancy cannot be resolved within 10 days, the waste will be returned to the generator.

The hazardous waste generator will be responsible for characterizing their waste. Waste received from off-site generators will be accompanied by an LDR-notification that has been prepared in accordance with Tennessee Rule 1200-1-11-.10 and 40 CFR Part 268.7(a)1, 3, or 5 and signed by the generator.

See Section J for additional information regarding the written operating record.

C-2f Additional Requirements for Facilities Handling Ignitable, Reactive, or Incompatible Waste

Waste characteristics have been reviewed for compatibility using a Y-12 Plant hazardous waste compatibility table similar to the list found in Tennessee Rule 1200-1-11-.06, Appendix .06/B, Examples of Potentially Incompatible Waste. See Appendix C-3 and Sections C-1, C-3, C-5 for additional information.

Mixing of incompatible wastes will also be prevented by requirements that the on-site

requirements. This data will be obtained by analysis of container contents and by knowledge of process. Waste determined to be restricted will be stored separately from non-restricted waste.

C-3a(1) Solvent Wastes and Dioxin-Containing Wastes

The wastes generated at the Y-12 Plant do not contain dioxin or dioxin-containing constituents based on knowledge of the processes. The wastes could contain solvents in the F-listed solvent classification. Since the exact composition of the solvent constituents will vary, the wastes will be considered to be F001, F002, and/or F005 wastes. This characterization is based on analytical data and on knowledge of solvent use at the Y-12 Plant. The wastes stored or treated in each of the units meet the definition of nonwastewater as defined in 40 CFR Part 268.2.

C-3a(2) California List Wastes

The California List places restrictions on liquid hazardous wastes containing PCBs greater than or equal to 50 ppm, over 1,000 ppm halogenated organic constituents, and liquids testing less than or equal to a pH of 2. All of the wastes stored at these units could contain

C-3c Additional Requirements for Disposal Facilities

Not applicable. The units covered in this permit application are not disposal facilities; therefore, the requirements for this section do not apply.

C-3d Additional Requirements for Surface Impoundments Exempted from Land Disposal Restrictions

Not applicable. The units covered in this permit application are not surface impoundments; therefore, the requirements for this section do not apply.

C-3e Requirements for Land Disposal Facilities With an Approved Exemption or Extension

Not applicable. The units covered in this permit application are not land disposal facilities; therefore, the requirements for this section do not apply.

SECTION D

PROCESS INFORMATION

This section discusses specific process information for the storage and treatment of hazardous wastes at four container storage areas and one treatment unit at the Y-12 Plant. These four units can be located on Map 2 in Appendix B-1. The four units addressed in this application include the following:

1. Building 9206 Container Storage Area
2. Building 9212 Container Storage Area
3. Building 9720-12 Classified Container Storage Area
4. Cyanide Treatment Unit

As required by 40 CFR Part 270.15 and Rules Governing Hazardous Waste Management in Tennessee, Rule 1200-1-11-.07(5)(b)1., this section describes the hazardous waste management processes used at the four areas.

Building 9206 Container Storage Area

Cyanide Treatment Unit

The Cyanide Treatment Unit is located in the northwest corner of the basement in Building 9201-5N. The cyanide treatment process converts cyanide in solution to carbon dioxide and nitrogen. The waste is currently treated in the drums in which it is stored. The treatment capacity of the unit is 195 gallons per day and the storage capacity is 2,200 gallons.

D-1 CONTAINER SYSTEMS

This section describes the storage and treatment capabilities of each unit.

D-1a Containers with Free Liquids

Some containers at Buildings 9206, 9212, and the Cyanide Treatment Unit have free liquids. The containers at Building 9720-12 do not have free liquids.

Wastes stored at Building 9206, 9212, and 9720-1

asphalt tile and the floors in the Butler Building and the staging area are concrete. The concrete floors of the storage units are free of cracks and gaps and are sufficiently impervious to contain spills. All galvanized tin cans and polyethylene bottles are stored on steel shelves or racks. The shelves and racks are capable of supporting the weight of the waste containers. The racks, shelves, and floors are compatible with the wastes stored. The storage capacity of this area is 3,975 gallons.

9212

Plan views of the container storage areas within Building 9212 are shown in Appendix D-1. The container storage areas contain the following number of storage racks:

Areas in 9212	Solutions Spaces	Residue Spaces
C-1 Wing	315	0
C-1 Wing Mezzanine	163	598
C-1 Wing Corridor	0	216
Headhouse	0	161

on elevated racks and contain no free liquids. The shelves and racks are capable of supporting the weight of the waste containers. The floor of the storage unit is free of cracks and gaps and is sufficiently impervious to contain spills. The racks, shelves, and floors are compatible with the wastes stored. The base of the storage area is sufficient to support the weight of the waste containers in the unit. The storage capacity for this area is 32,500 gallons.

Cyanide Treatment Unit

The Cyanide Treatment Unit is shown in plan view in Appendix D-1. The storage area can store up to forty, 55-gallon drums of cyanide waste. The area has a 2-inch curb on a concrete base floor that is free of gaps and cracks. Asphalt tiles have been applied to floor surface to prevent spills from migrating. All drums are stored single-stacked on pallets. The floor is capable of supporting the weight of the waste containers. The treatment capacity of the unit is 195 gallons/day; the storage capacity of the unit is 2,200 gallons.

Building 9201-5N is a major industrial-type building at the Y-12 Plant. Its construction is typical of an industrial or military facility. The building is capable of bearing the load of numerous types of production, storage, utility, and maintenance equipment, as well as personnel. The floor of the Cyanide Treatment Unit is the first floor, eight-inch concrete slab of Building 92

to prevent possible contact with any liquid on the floor. Waste containing free liquids is not stored in Building 9720-12.

Cyanide Treatment Unit

The unit is located in the basement of a Building 9201-5N. Drummed wastes are stored upright on pallets to prevent possible contact with standing liquids. A maximum of 2,200 gallons of drummed waste is stored at the Cyanide Treatment Unit and the drums are not stacked. Two-inch high, coated concrete curbs and ramps exist to prevent the flow of liquids to adjoining areas and to contain any spills or leaks within the area until they are properly removed.

D-1a(3) Capacity of the Containment System Relative to the Number and Volume of the Containers to be Stored

Conventional secondary containment is not provided for liquid waste storage areas at Buildings 9206 and 9212 due to criticality safety concerns. Because the wastes contain enriched uranium, construction of diking or other conventional secondary containment would result in unsafe storage geometries that could potentially result in a nuclear criticality accident. The safe storage of liquid wastes

Containment Volume = 720 gal + 568 gal - 85 gal - 109 gal = 1,094 gal

Drum Displacement

$40 \times (2 \text{ ft})^2 \times \pi \times 0.25 \times 0.167 \text{ ft} = 21 \text{ ft}^3$

$21 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 157 \text{ gal}$

Pallet Displacement

10 x 12 gal/pallet = 120 gal

Total Displacement = 157 gal + 120 gal = 277 gal

Total Available Secondary Cont

Building 9720-12

Accumulated liquid at 9720-12 would be from wind-driven precipitation or utility leaks since no free liquids are stored in these containers.

Cyanide Treatment Unit

Accumulated liquids at the Cyanide Treatment Unit could be present as a result of a spill or leak from the container within the diked area. If the spill or leak can be traced to a particular drum, the analysis may already be known. If the source of the liquid cannot be identified, the collected material will be sampled and analyzed. Spilled or leaked waste liquid would be treated at the unit.

Removal of spilled liquids will be accomplished by the use of portable pumps or by the use of absorbent material depending on the quantity of material present. Accumulated liquids will be removed immediately after their discovery. See Section F-2c and G-5f for additional information in the event of a release.

D-1b Containers Without Free Liquids

cyanide are clearly marked "ACID" or "CYANIDE". Only material with an appropriate label is processed or stored in a process-specified hood.

The unit personnel are fully trained in precautions to prevent mixing acids and cyanides, and this topic is discussed frequently in regular safety meetings. Personnel are also trained by means of a sniff test developed by DuPont to recognize the odor of hydrogen cyanide gas.

No ignitable wastes are stored or processed at the Cyanide Treatment Unit.

Building 9201-5N is located more than 15 meters (50 feet) from the plant boundary.

D-2 TANK SYSTEMS

Not applicable. The units covered in this permit application are not tank systems; therefore, the requirements of this section do not apply.

D-3 WASTE PILES

Not applicable. The units covered in this permit application are not waste piles; therefore, the

SECTION E

GROUNDWATER MONITORING

Groundwater monitoring is not required for Building 9206, 9212, and 9720-12 Container Storage Areas and the Cyanide Treatment Unit as per the requirements of 40 CFR Part 264, Subpart F and Tennessee Rule 1200-1-11-.07(5)(c) which exclude container storage areas from the groundwater monitoring requirement.

F-1a(2) Barriers and Means to Control Entry

Controlled access through guarded portals limits the entry to the units in this permit application. Additional controls such as locked doors prevent the unauthorized entry to the units. See Section F-1a(1) for additional information.

F-1a(2)(a) Barrier

An eight foot high chain-linked fence topped with barbed wire completely surrounds all the units in this permit application. In addition, all the units are within the fully secured (protected) area. See Section F-1a(1) for additional information.

F-1a(2)(b) Means to Control Entry

Access to the units inside the protected area of the Y-12 Plant is controlled through guarded portals. Doors and gates to the units are locked during off-shift hours or when the authorized facility operator is not present. The gates or doors may be opened on off-shifts and weekends to allow overtime work. See Section F-1a(1) for additional information.

unacceptable. If the status of a particular item is unacceptable, appropriate and complete information is recorded, including date and nature of repairs and remedial action. Evaluation and/or correction of unacceptable items will be initiated within 24 hours of the inspection. Typical inspection log sheets are provided in Appendix F-2.

F-2b(1) Container Inspection

Inspections of the container storage areas are conducted according to the general description in Section F-2b and the inspection schedule in Appendix F-1. The container storage areas are inspected on a weekly basis, at a minimum, and recorded on the inspection logs. Typical logs are presented in Appendix F-2.

F-2b(2) Tank System Inspection

Not applicable. The units covered in this permit application are not tank systems; therefore, the requirements of this section do not apply.

F-2b(3) Waste Pile Inspection

Not applicable. The units covered in this permit application are not waste piles; therefore, the requirements for this section do not apply.

After an inspection, each log sheet is filed at the responsible Department Head's office, and these records are kept in accordance with Recordkeeping, Section J.

F-3 WAIVER OF PREPAREDNESS AND PREVENTION REQUIREMENTS

The Y-12 Plant does not request a waiver of the preparedness and prevention requirements. Requirements of this subpart are primarily addressed in Sections D, F, and G of this application.

F-3a Equipment Requirements

Additional internal and external communication systems, emergency equipment, and fire control equipment are discussed in Section G, Contingency Plan.

F-3a(1) Internal Communications

The Y-12 Plant does not request a waiver of the preparedness and prevention requirements. Requirements of this subpart are primarily addressed in Sections D, F, and G of this application.

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F-5f Incompatible Wastes in Tanks

Not applicable. The units in this permit application are not tank systems; therefore, the requirements of this section do not apply.

F-5g Ignitable or Reactive Wastes in Waste Piles

Not applicable. The units covered in this permit application are not waste piles; therefore, the requirements for this section do not apply.

F-5h Incompatible Wastes in Waste Piles

Not applicable. The units covered in this permit application are not waste piles; therefore, the requirements for this section do not apply.

F-5i Ignitable or Reactive Wastes in Surface Impoundments

Not applicable. The units covered in this permit application are not surface impoundments; therefore, the requirements for this section do not apply

MARTIN MARIETTA

**Resource Conservation and Recovery
Act (RCRA) General Contingency Plan
for Hazardous Waste Treatment,
Storage, and Disposal Units
at the Oak Ridge Y-12 Plant**

Environmental Management Department

**Health, Safety, Environment, and
Accountability Organization**

August 1994

**Prepared by the
Oak Ridge Y-12 Plant
Oak Ridge, Tennessee 37831
Managed by
MARTIN MARIETTA ENERGY SYSTEMS, INC.
for the
U.S. DEPARTMENT OF ENERGY
under contract DE-AC05-84OR21400**

**MANAGED BY
MARTIN MARIETTA ENERGY SYSTEMS, INC.
FOR THE UNITED STATES
DEPARTMENT OF ENERGY**

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August 1994

Y/TS-1015/R2

**Resource Conservation and Recovery Act (RCRA)
Contingency Plan for
Hazardous Waste Treatment, Storage, and Disposal Units
at the Oak Ridge Y-12 Plant**

**Environmental Management Department
Health, Safety, Environment, and Accountability Organization**

**Prepared by the
Oak Ridge Y-12 Plant
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The duties of the PED as the Emergency Coordinator include:

- Receiving notice that an incident has occurred;
- Evaluating the threat;
- Activating internal alarm systems to notify or evacuate personnel, if appropriate;
- Proceeding immediately to obtain information concerning released materials and initiating appropriate activities for characterizing and abating the release;
- Ensuring that necessary on-site notifications are made;
- Performing an assessment of the potential for off-site effects upon the public health and environment and notifying DOE-Oak Ridge EOC of the same;
- Initiating and directing a plan of action;
- Mobilizing sufficient forces, including technical assistance, to respond to the emergency at hand;
- Directing the overall effort to respond to plant emergencies in such a way as to ensure that all emergency groups, both local and plantwide function as a team.
- Delegating authority in any capacity necessary if the need arises during an emergency;
- Authorizing all rescue efforts requiring any employee experiencing illness or injury;
- Seeing that off-site medical facilities are notified immediately when a seriously ill or injured patient is en route, and provide the nature of the injury or illness;
- Ensuring that a medical department staff member, a supervisor, or someone knowledgeable as to the circumstances or acquainted with the details of any serious accident or illness accompanies the patient to the emergency room;
- Determining the accessibility of plant areas after an accident and authorizing reentry of evacuated areas;

- Under special conditions, requesting the designation of a technical group to assist in evaluating the advisability of reentry;
- Terminating emergency status when the threat is entirely gone;
- Authorizing, when applicable, the sounding of the "all clear" signal at the termination of an emergency; and
- Restoring the plant to normal operations.

The names and work numbers of the PSS are provided below:

<u>Name</u>	<u>Building Location</u>	<u>Work Phone</u>
W. M. Bradley	9706-2	(615) 574-7172
L. K. Brooks	9706-2	(615) 574-7172
J. D. Chapman	9706-2	(615) 574-7172
E. Manis	9706-2	(615) 574-7172
P. C. Norris		

- Initial evaluation of the magnitude of the problem;
- Evacuation of personnel from immediate danger;
- Arranging for assembly, organization, and briefing of emergency response personnel who have been summoned;
- Providing updated information on conditions, progress of response, and additional manpower or equipment needs to the PED;
- Directing operational changes needed (e.g., shutting off process flows);
- Implementing applicable prearranged plans and procedures; and
- Continuing to provide incident control until relieved by an alternate incident commander.

The following actions will be taken in areas affected by a fire or explosion:

1. Work in the affected areas will be shut down immediately.
2. Feedlines and additional equipment will be shut down, as necessary and practical.
3. The PED will be contacted.
4. The area will be cleared of all personnel not actively involved in fighting the fire. These persons are to report to the designated assembly points for accountability.
5. All injured persons will be removed, and medical treatment will be administered by Medical Department personnel with outside assistance, as required.

EMERGENCY

- Need for operational changes.
- Considers the need for and arranges for any large-scale alert, evacuation, general alert, invocation of mutual assistance agreements, and procurement of additional emergency personnel or emergency equipment.
- Keeps Y-12 Plant management and appropriate staff groups informed.
- Determines when the emergency is over, and orders the "all clear" signal.

The Emergency Management Department staff is responsible for:

- Y-12 Plant-wide emergency planning.
- Updating the Emergency Management Plan.
- Planning for practice exercises.
- Coordinating the organization and training of emergency service units and local emergency organizations.
- Ensuring that plans are in place for receiving and evaluating emergencies.
- Ensuring that plans are in place for activating internal alarm systems to alert/evacuate personnel.
- Planning coordination for the emergency response team; determine if outside assistance is required.
- Ensuring that plans are in place to report incidents to personnel at the DOE, Oak Ridge Operations in accordance with DOE Order 5000.3A "Occurrence and Processing of Operations Information."

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EVACUATION PLAN

All emergencies at the Y-12 Plant warrant prompt and deliberate action. Criteria for evacuation have been established. The PED is responsible for determining whether evacuation is necessary. The Y-12 Emergency Management Plan contains details of this criteria. If evacuation of the Y-12 Plant is necessary evacuation routes that would typically be used are illustrated in Figure 4.

REQUIRED REPORTS

The PED will note in the operating record the time, date, and details of any incident which required implementation of the Contingency Plan. Internal reports will be filed as required by DOE and Martin Marietta Energy Systems, Inc., personnel.

Within 15 days after the incident, personnel from the Y-12 Plant will submit a written report on the incident which required implementation of the Contingency Plan to the DOE staff for review and transmittal to the Commissioner of the Tennessee Department of Environment and Conservation, as required by Tennessee Rule 1200-1-11-.06(5)(c). The report will include:

- Name

Building 9720-12 Classified Container Storage Area

The Building 9720-12 Classified Container Storage Area is located on West Second Street. The nearest Gamewell box is located in the northwest corner of Building 9720-12. This Gamewell box is connected to the existing plant Gamewell Fire Alarm System and Plant Monitoring System. Portable eyewash and safety shower stations are used. Two-way radios are used to communicate with the PED office if emergency assistance is needed.

Building 9720-12 is a storage unit for hazardous, nonhazardous, and mixed waste. Waste is stored at this building until waste analysis and appropriate recycling techniques can be arranged.

APPENDIX B

EMERGENCY and SPILL RESPONSE EQUIPMENT

Spill Response Trailer Equipment and Supplies

The Y-12 Plant Spill Response Trailer, maintained by the Fire Department, is located in the plant and contains supplies and equipment for the response team. The following is an indication of the typical contents of that trailer:

Respirators	Ladder (10 ft.)
Rubber Boots	Reflector Vest (orange)
Rain Suits	Water (for pump)
Paper Suits	Demineralized Water
Rubber Gloves	Pipe Wrench
Acid-type Gloves	Pliers
Acid Suits	Pliers, Needle Nose
Respirator Cartridges (Combination)	Adjustable Wrench
Flagging	Vise Gri

Building 9720-41

Additional supplies and equipment is located in Building 9720-41. Typical supplies and equipment are listed below:

Pigs
Gas and Air Driven Pumps
Oil Skimmer Booms
Sandbags
Empty Drums (including overpack drums)
Absorbent Diapers
Hoses
Gloves
Ear Plugs
Safety Glasses
Generators
Lighting Systems

Building 9753

Additional supplies and equipment is located in Building 9753. Typical supplies and equipment are listed below:

Leather Gloves
Rubber Gloves
Flashlights
Flashlight Batteries
Chemical Splash Goggles
Shovels
Picks
Boots
Sand Bags
Plastic, 20' x 100' Rolls
Plastic Bags
Barrels
Road Cones
Flagging Strips
Rope
Absorbent Diapers
Paper Suits
Rain Suits

Fire-Fighting and Medical Response Vehicles:

The Y-12 Plant Fire Department typically operates the following fire-fighting and medical response vehicles:

Fire Pumper No. 1

Fire Pumper No. 2

Fire Pumper Backup

Cardox Fire Fighting Truck

Emergency Response Truck

Fire Chief's Truck

Service Van

Routine Transportation Van

Fire Fighting Equipment Truck

APPENDIX C
EXAMPLES OF EMERGENCY MUTUAL AID COORDINATION AGREEMENTS

