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**OU #2 TREATABILITY STUDY REPORT RESPONSE
TO COMMENTS**

10-21-92

**USEPA/DOE-FN
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LETTER**



UNITED STATES ENVIRONMENTAL
REGION 5
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REPLY TO THE ATTENTION OF:

OCT 21 1992

Mr. Jack R. Craig
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

HRE-8J

RE: OU #2 Treatability Study
Report Response to Comments

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Operable Unit #2 Treatability Study Report Response to Comments (RTC). The RTC addressed and clarified the majority of U.S. EPA's comments and concerns.

U.S. EPA hereby approves the RTC pending incorporation of the enclosed comments. These comments must be addressed before the United States Department of Energy submits a Treatability Study Report Addendum.

Please contact me at (312/FTS) 886-0992 if you have any questions.

Sincerely,

James A. Saric
Remedial Project Manager

Enclosure

cc: Graham Mitchell, OEPA-SWDO
Pat Whitfield, U.S. DOE-HDQ
Dennis Carr, WMCO

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bcc w/o attachment:

William Muno->Norm Niedergang->Kevin Pierard, WMD
Brian Barwick, ORC
Cheryl, Allen, OPA

bcc w/attachment:

Larry Jensen, ARD
Tom Hahne, PRC

ATTACHMENT

DRAFT TREATABILITY STUDY REPORT FOR OPERABLE UNIT 2

DOE RESPONSE TO EPA COMMENTS

TECHNICAL REVIEW COMMENTS

1. Response to EPA General Comment No. 5. DOE's response to this comment states that data reported as nondetected were assigned a value of one-half the sample quantitation limit (SQL) in all statistical calculations. The response also presents a procedure for systematically eliminating data reported as nondetected but that have relatively high SQLs from statistical analyses. In many instances, much data is eliminated. For instance, in the example presented in EPA's comment, only one of the 12 samples were used in the statistical analysis. EPA agrees with the approach given in the first paragraph of DOE's response that all data reported as nondetected (regardless of the SQL) should be assigned a value of one-half the SQL in all statistical calculations, but DOE should provide a rationale for eliminating data with high SQLs from the statistical analyses. DOE also refers to a risk-based quantitation limit. This term should be defined.
2. Response to EPA Specific Comment No. 6. DOE does not address this comment satisfactorily. The treatability study report seems to conclude that sulfate does not detrimentally affect the long-term unconfined compressive strength of the stabilized waste. However, the report does not indicate why DOE believes that the 90-day study period is long enough to assess long-term detrimental effects of sulfate. If longer periods of time are required to study the long-term detrimental effects of sulfate, DOE should provide the results of the 90-day study and indicate that the results are inconclusive.
3. Response to EPA Specific Comment No. 14. As stated in EPA specific comment no. 14, much of the data for silver is apparently reported in

the wrong units. This error is the most likely reason for outliers, which resulted from the fact that data reported with the correct units appear much higher than data reported with the wrong units. The revised 95 percent upper confidence limit (UCL) for silver should be recalculated and reported in the treatability study report, and this value should be compared with the leachate action levels.