

4043

**NITRIC ACID TANK CAR AND AREA REMOVAL  
ACTION NO. 24 WORK PLAN AND CLOSURE  
PLAN INFORMATION AND DATA PACKAGE  
JANUARY 1993  
(U.S. EPA AND OHIO EPA COMMENTS AND  
DISPOSITION RECORDS)**

01/01/93

**DOE-FN/EPA  
15  
COMMENTS**

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**U.S. EPA AND OHIO EPA COMMENTS  
AND DISPOSITION RECORDS**

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NITRIC ACID TANK CAR AND AREA  
REMOVAL ACTION NO. 24 WORK PLAN AND  
CLOSURE PLAN INFORMATION AND DATA PACKAGE

Fernald Environmental Management Project

January 1993

COMMENT DISPOSITION RECORD

Document: Nitric Acid Tank Car and Area Removal Action #25 RAWP/CPID

4043

Reviewer: Ohio EPA (Removal Action)

#	COMMENT	PROPOSED DISPOSITION
GENERAL COMMENTS		
1	DOE should consider a limited removal of soils to clean close this unit. DOE should keep open the option of removing some soils if a clean closure could be reached with minimal excavation.	<p>Analysis of the Nitric Acid Tank Car's contents has indicated the presence of uranium and nonradioactive chromium at low concentrations within the small volume of residual nitric acid. Although there is currently no evidence of leakage or spills from the Tank Car at its present location, in the event that spills did occur, the nitric acid will have been neutralized and diluted, resulting in levels of nitrate within the underlying soils. The uranium and chromium would be expected to deposit within the underlying track ballast and soil following neutralization of the acid.</p> <p>As indicated in Section 3.3 of the work plan, the underlying soil and track ballast will be analyzed for nitrates, metals, pH, and uranium isotopes. The work plan will be revised to indicate, in the event that soil contamination is identified in excess of applicable criteria, that a decision will be made whether soil removal will be conducted, to the extent possible, as part of this Removal Action 25 or as a separate removal action.</p> <p>For pH and nitrates the soil criteria are provided by the Ohio EPA Closure Guidance Document. For TCLP metals, the standard of clean will be based on comparison to FEMP background metals concentrations as determined by the FEMP soil background study (Section 3.1.2). The soil will be considered clean if none of the samples exceed the mean background concentration (based on total metals analysis) plus two standard deviations. For uranium, the soil will be considered clean if none of the samples exceed 100 pCi/g, the level established by Removal Action No. 17 as the point at which contaminated soils require controlled storage. The goal of this action is clean closure.</p> <p>Affected pages: ES-1, 3-2, 3-10, 3-11, 3-17, 3-31, 4-1.</p>

02

COMMENT DISPOSITION RECORD

Document: Nitric Acid Tank Car and Area Removal Action #25 RAWP/CPID

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Reviewer: Ohio EPA (Removal Action)

	SPECIFIC COMMENTS	
1	Section 3.2.2.4, pgs. 3-14 and 15: The document fails to detail how solids/sludges will be removed from the tanker, if they exist. The work plan should include this information.	<p>The text will be revised to clarify the role of triple rinsing and pumping to suspend and remove solids in the unlikely event they are present. Rinsing the Tank Car will be conducted in two stages. In the first stage, three separate rinses will be performed, following removal of the Tank Car contents, and the rinseate (approximately 60 - 100 gal.) will be combined with the Tank Car contents for transfer to the UNH system. A fourth rinse will then be performed and the rinseate (approximately 40 - 60 gal.) will be collected for analysis in a clean unused storage container approved for this use. Pumping will be performed using established procedure SOP-20-C-916 and a pump capable of suctioning residual material from the bottom of the Tank Car.</p> <p>Affected pages: 3-16.</p>
2	Section 3.3.2.2, pg. 3-27: It is unclear as to whether reprocessed materials would have been digested in nitric acid transported in the tanker. If this a possibility, DOE should analyze the tanker contents for a more comprehensive list of radionuclides.	<p>There is no evidence that indicates the potential for additional radiological contaminants associated with reprocessed materials. However, an additional gamma screening analysis has been included in the sampling and analysis plan to confirm this.</p> <p>Affected pages: 3-24.</p>
3	Figure 3-1, pgs. 3-28: If figure is drawn to scale, provide a scale. If the figure is not drawn to scale, note it on the figure.	<p>The drawing is not to scale and an appropriate note has been added to the figure.</p> <p>Affected pages: 3-30.</p>

03

COMMENT DISPOSITION RECORD

Document: Nitric Acid Tank Car and Area Removal Action #25 RAWP/CPID

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Reviewer: Ohio EPA (Removal Action)

4	<p>Section 3.4.4, pgs. 3-32, 1st bullet: The plan should provide additional information concerning treatment and disposal of the liquid. The material is a hazardous waste and an integral part of the removal action and must be accounted for within the work plan.</p>	<p>Analyses indicate the presence of chromium and uranium in the Tank Car contents. Accordingly, the Tank Car contents will be transferred to the UNH processing system (Removal Action 20) for treatment and disposal.</p> <p>The UNH system is an ongoing removal action involving the processing of material with characteristics similar to those of the Tank Car. Transfer of the Tank Car contents to the UNH system is consistent with the volume and toxicity reduction objectives discussed in the NCP. The scope of the Nitric Acid Tank Car Removal Action No. 25 is limited to the transfer of the Tank Car contents to the UNH system. The responsibility for treatment and disposal of the Tank Car contents is assigned to the Removal Action No. 20 UNH System. The Removal Action No. 20 Information Package identifies exempted permits, permitting standards, and demonstrates that Removal Action No. 20 will comply with those standards.</p> <p>Additional detail will be added to the work plan regarding the specific treatments implemented by the UNH treatment system. The UNH system located in Plant 2/3 is used to concentrate the solutions of UNH into a stable filter cake. The UNH solution is blended into a uniform mixture, pH adjusted and precipitated using magnesium hydroxide or lime. The above will be filtered through a rotary vacuum filter press. The semi-solid material will be drummed.</p> <p>Affected pages: 3-5.</p>
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04

COMMENT DISPOSITION RECORD

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Document: Nitric Acid Tank Car and Area Removal Action #25 RAWP/CPID

Reviewer: Ohio EPA (Removal Action)

<p>5</p>	<p>Section 3.4.4, pgs 3-32, 2nd bullet: DOE should commit to at least removing soils, if sampling results suggest contaminated soils are readily removable.</p>	<p>As indicated in Section 3.3 of the work plan, the underlying soil and track ballast will be analyzed for nitrates, metals, pH, and uranium isotopes. The work plan will be revised to indicate, in the event that soil contamination is identified in excess of applicable criteria, that a decision will be made whether soil removal will be conducted, to the extent possible, as part of this Removal Action 25 or as a separate removal action.</p> <p>For pH and nitrates the soil criteria are provided by the Ohio EPA Closure Guidance Document. For TCLP metals, the standard of clean will be based on comparison to FEMP background metals concentrations as determined by the FEMP soil background study (Section 3.1.2). The soil will be considered clean if none of the samples exceed the mean background concentration (based on total metals analysis) plus two standard deviations. For uranium, the soil will be considered clean if none of the samples exceed 100 pCi/g, the level established by Removal Action No. 17 as the point at which contaminated soils require controlled storage. The goal of this action is clean closure.</p> <p>Affected pages: ES-1, 3-2, 3-10, 3-11, 3-17, 3-31, 4-1.</p>
<p>6</p>	<p>Section 3.4.5.3, pgs. 3-37: If the decontaminated tanker is no longer useable or is surplus, DOE should consider adding the tanker to the scrap metal pile removal action.</p>	<p>The DOE has evaluated the possibility of transferring the Tank Car to the scrap metal pile removal action and has determined that schedule and contractual constraints associated with that removal action preclude such a transfer. The Tank Car will be dismantled and scrapped as an independent action in accordance with the provisions of Removal Action No. 9, Removal of Waste Inventories.</p> <p>Affected pages: None.</p>
<p>7</p>	<p>Section 3.4.5.6, pgs. 3-39 &amp; 40: The 3rd paragraph on pg. 39 states 3 ft<sup>3</sup> of solids will be generated by external decontamination yet the 1st full paragraph on pg. 40 suggests .5 ft<sup>3</sup> will be generated. Please clarify.</p>	<p>The text will be clarified to indicate that 3 ft<sup>3</sup> is associated with the decon of Tank Car external surfaces while the 0.5 ft<sup>3</sup> is associated with final decon of hardware removed from within the Tank Car.</p> <p>Affected pages: 3-40, 3-41.</p>

05

COMMENT DISPOSITION RECORD

Document: Nitric Acid Tank Car and Area Removal Action #25 RAWP/CPID

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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

#	COMMENT	PROPOSED DISPOSITION
	SPECIFIC COMMENTS	
8	<p>Closure plans must be submitted to the Director, Ohio EPA as required by Ohio Administrative Code (OAC) Rule 3745-66-23. Submit a copy of this closure plan to the Director, Ohio EPA.</p>	<p>A copy of the revised plan will be submitted to the Director, Ohio EPA.</p> <p>Affected pages: None.</p>
9	<p>DOE-FEMP must fully characterize the tank car contents to determine whether it is TCLP toxic. DOE-FEMP must also identify all hazardous constituents contained within this material. Please refer to the Ohio EPA Closure Plan Review Guidance (page 19, 3.5) for further information.</p>	<p>Consistent with process knowledge and Tank Car historical data, the Tank Car contents have been analyzed for pH, acid normality, uranium, and TCLP metals. The analytical results are consistent with process knowledge indicating a pH &lt; 1, acid normality approximately 3, 2 ppm uranium, and 1,600 mg/l chromium. No further contents characterization is felt to be necessary in order to proceed with this action.</p> <p>Affected pages: None.</p>
10	<p>Section 3.2.2.2 of the plan very briefly describes the procedures to be used to neutralize the tank contents. DOE-FEMP must provide additional details regarding this process. This additional information should demonstrate how DOE-FEMP will conduct this treatment in a manner that will not: 1) Generate extreme heat or pressure, fire or explosion, or violent reaction; 2) Produce uncontrolled toxic units, fumes, or dusts, or gases in sufficient quantities to threaten human health; 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; 4) Damage the structural integrity of the device or facility containing the waste; or 5) Through other means threaten human health or the environment.</p> <p>DOE-FEMP must also include provisions for analyzing the waste after treatment to ensure neutralization is complete.</p>	<p>Analyses indicate the presence of chromium and uranium in the Tank Car contents. Accordingly, the Tank Car contents will be transferred to the UNH processing system (Removal Action 20) for treatment and disposal. The UNH system is an ongoing removal action involving the processing of material with characteristics similar to those of the Tank Car. Transfer of the Tank Car contents to the UNH system is consistent with the volume and toxicity reduction objectives discussed in the NCP. Additional detail will be added to the work plan regarding the specific treatments implemented by the UNH treatment system.</p> <p>The UNH system located in Plant 2/3 is used to concentrate the solutions of UNH into a stable filter cake. The UNH solution is blended into a uniform mixture, pH adjusted and precipitated using magnesium hydroxide or lime. The above will be filtered through a rotary vacuum filter press. The semi-solid material will be drummed.</p> <p>Affected pages: 3-5.</p>

COMMENT DISPOSITION RECORD

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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

<p>11</p>	<p>The plan states Section 3.2.2.3 that in the event the waste is TCLP toxic, it will be transferred to the existing Nitric Acid Tanks. The plan must specify which tank or tanks will receive the waste, and must provide information which demonstrates that the waste is compatible with the existing contents of the Nitric Acid Tank (s).</p>	<p>Additional detail will be added regarding the method and point of transfer to the UNH treatment system. The Tank Car contents and rinseate from the first 3 rinses will be transported in a mobile dumpster tank to the digestion area of Plant 2/3. Once there, established procedure SOP 20-C-916 will be used to transfer the material from the dumpster into the Plant 2/3 sump from which it will be introduced into the UNH system.</p> <p>Affected pages: 3-16.</p>
<p>12</p>	<p>Section 3.2.2.5 of the plan states that remediation of any soil will be performed in conjunction with OU-5 remedial activities. Ohio EPA has indicated to DOE-FEMP on numerous occasions that if a clean closure of a unit is reasonably feasible, then DOE-FEMP must pursue clean closure. For example, if removal of the top six inches of soil over a 100 square foot area will achieve clean closure, DOE-FEMP should undertake soil removal activities.</p> <p>Therefore, the up-front assumption that soil remediation will be deferred to the CERCLA process is unacceptable. DOE-FEMP must revise the plan to indicate that the goal of the plan is to clean close the unit. Should sampling and analysis of the soil under and around the unit demonstrate that clean closure is not achievable, DOE-FEMP must submit an amended closure plan which describes subsequent actions that will be taken.</p>	<p>As indicated in Section 3.3 of the work plan, the underlying soil and track ballast will be analyzed for nitrates, metals, pH, and uranium isotopes. The work plan will be revised to indicate, in the event that soil contamination is identified in excess of applicable criteria, that a decision will be made whether soil removal will be conducted, to the extent possible, as part of this Removal Action 25 or as a separate removal action.</p> <p>For pH and nitrates the soil criteria are provided by the Ohio EPA Closure Guidance Document. For TCLP metals, the standard of clean will be based on comparison to FEMP background metals concentrations as determined by the FEMP soil background study (Section 3.1.2). The soil will be considered clean if none of the samples exceed the mean background concentration (based on total metals analysis) plus two standard deviations. For uranium, the soil will be considered clean if none of the samples exceed 100 pCi/g, the level established by Removal Action No. 17 as the point at which contaminated soils require controlled storage. The goal of this action is clean closure.</p> <p>Affected pages: ES-1, 3-2, 3-10, 3-11, 3-17, 3-31, 4-1.</p>

07

COMMENT DISPOSITION RECORD

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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

<p>13</p>	<p>It is unclear in section 3.3.1.2 whether the wastes will be analyzed for metals using total analysis, TCLP analysis, or both. As indicated in comment 2, the waste must be characterized to determine whether it is TCLP toxic, and all hazardous constituents contained in the waste must be identified.</p>	<p>The text in Sections 3.3.1.2 will be clarified to indicate that all metals analyses are performed using a total analysis method for the TCLP listed metals. In the event that results of the total analyses indicate that TCLP maximum concentrations may be exceeded, a TCLP extraction will be performed and the metals analysis repeated for direct comparison to the limit. In the case of the track ballast samples (gravel), only TCLP extraction/analysis will be performed. All hazardous contaminants of concern, as identified in Section 3.3 of the plan, will be identified.</p> <p>Affected pages: 3-22.</p>
<p>14</p>	<p>In section 3.3.1.3 of the plan, it is stated that the rinseate will be analyzed for TCLP metals. It is unclear as to whether totals analysis or TCLP analysis will be clean. The rinseate must be seen using total analysis.</p>	<p>A total analysis will be performed as described in the response to Specific Comment No. 13 above.</p> <p>Affected pages: 3-22.</p>

08

COMMENT DISPOSITION RECORD

Document: Nitric Acid Tank Car and Area Removal Action #25 RAWP/CPID

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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

<p>15</p>	<p>Section 3.4.4 of the plan states that the plan covers transferring the Tank Car liquid to Tank 17 and does not cover actions to be taken with the liquid once it is contained in Tank 17. This is unacceptable. OAC 3745-66-11 states that the owner shall close his facility in a manner that: a) Minimizes the need for further maintenance; b) Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, ....; and c) Complies with the closure requirements of rules .... of the Administrative Code.</p> <p>The plan as written does not minimize the need for further maintenance nor minimize the post-closure escape of hazardous waste and/or constituents. In the event that the waste is transferred to Tank 17, the plan must include provisions to demonstrate the waste is completely neutralized and a description of the ultimate disposition of the waste, along with a schedule for these activities. In the event the waste is transferred to the Nitric Acid Tank (s), the ultimate disposition of the waste must be addressed.</p>	<p>Analyses indicate the presence of chromium and uranium in the Tank Car contents. Accordingly, the Tank Car contents will be transferred to the UNH processing system (Removal Action 20) for treatment and disposal.</p> <p>The UNH system is an ongoing removal action involving the processing of material with characteristics similar to those of the Tank Car. Transfer of the Tank Car contents to the UNH system is consistent with the volume and toxicity reduction objectives discussed in the NCP. The scope of the Nitric Acid Tank Car Removal Action No. 25 is limited to the transfer of the Tank Car contents to the UNH system. The responsibility for treatment and disposal of the Tank Car contents is assigned to the Removal Action No. 20 UNH System. The Removal Action No. 20 Information Package identifies exempted permits, permitting standards, and demonstrates that Removal Action No. 20 will comply with those standards.</p> <p>Additional detail will be added to the work plan regarding the specific treatments implemented by the UNH treatment system. The UNH system located in Plant 2/3 is used to concentrate the solutions of UNH into a stable filter cake. The UNH solution is blended into a uniform mixture, pH adjusted and precipitated using magnesium hydroxide or lime. The above will be filtered through a rotary vacuum filter press. The semi-solid material will be drummed.</p> <p>Affected pages: 3-5.</p>
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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

<p>16</p>	<p>Section 3.4.4 also states that soil removal will be performed only to obtain soil characterization samples. This is unacceptable; see comment 5.</p>	<p>As indicated in Section 3.3 of the work plan, the underlying soil and track ballast will be analyzed for nitrates, metals, pH, and uranium isotopes. The work plan will be revised to indicate, in the event that soil contamination is identified in excess of applicable criteria, that a decision will be made whether soil removal will be conducted, to the extent possible, as part of this Removal Action 25 or as a separate removal action.</p> <p>For pH and nitrates the soil criteria are provided by the Ohio EPA Closure Guidance Document. For TCLP metals, the standard of clean will be based on comparison to FEMP background metals concentrations as determined by the FEMP soil background study (Section 3.1.2). The soil will be considered clean if none of the samples exceed the mean background concentration (based on total metals analysis) plus two standard deviations. For uranium, the soil will be considered clean if none of the samples exceed 100 pCi/g, the level established by Removal Action No. 17 as the point at which contaminated soils require controlled storage. The goal of this action is clean closure.</p> <p>Affected pages: ES-1, 3-2, 3-10, 3-11, 3-17, 3-31, 4-1.</p>
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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

<p>17</p>	<p>Section 3.4.5.6 states that it is anticipated that most of the decontamination water will have pH greater than 2. This cannot be assumed. The plan must provide for adequate characterization of the decontamination water prior to pumping to Tank 17.</p>	<p>Rinsing the Tank Car will be conducted in two stages. In the first stage, three separate rinses will be performed, following removal of the Tank Car contents, and the rinseate (approximately 60 - 100 gal.) will be combined with the Tank Car contents for transfer to the UNH system. A fourth rinse will then be performed and the rinseate (approximately 40 - 60 gal.) will be collected for analysis in a clean unused storage container approved for this use. Rinseate from this fourth rinse will be sampled and analyzed for metals (total), uranium, and pH. If the results of the metals analyses indicate the TCLP maximum concentrations will not be exceeded, the rinseate will be transferred to the waste water treatment system for final processing and discharge. If the total results indicate that TCLP limits may be exceeded, a TCLP extraction will be performed and a second metals analysis will performed for direct comparison to the limits. If this second TCLP analysis exceeds the TCLP limit, or the pH is less than 2, additional rinse cycles will be performed until the results are reduced below these limits.</p> <p>Affected pages: 3-16, 3-40.</p>
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Reviewer: Ohio EPA (Closure Information)<sup>a</sup>

<p>18</p>	<p>Section 4.1.1 discusses clean standards for soil. This section of the plan is very unclear. The plan does not state what values will be used for background for the metals. Please refer to the Ohio EPA Closure Guidance Document for guidance on acceptable background levels and procedures for establishing clean standards. This section of the plan must be revised to more clearly reflect the requirements of OHIO EPA's Closure Guidance Document. DOE should consider using the soil background study conducted in 1991.</p>	<p>Sections 3.1.2 and 4.1.1 will be revised to reference the FEMP Soil Background Study and indicate that background levels for metals will be based on the results of that study. Soil samples will be collected and analyzed for the Nitric Acid Tank Car's contaminants of concern (Section 3.3). The soil will be considered clean if none of the samples exceed applicable standards. For pH and nitrates these standards are provided by the Ohio EPA Closure Guidance Document.</p> <p>For TCLP metals, the standard of clean will be based on comparison to FEMP background metals concentrations as determined by the FEMP soil background study (Section 3.1.2). The soil will be considered clean if none of the samples exceed the mean background concentration (based on total metals analysis) plus two standard deviations. For uranium, the soil will be considered clean if none of the samples exceed 100 pCi/g, the level established by Removal Action No. 17 as the point at which contaminated soils require controlled storage.</p> <p>Affected pages: 4-1.</p>
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a - Although FERMCO agrees to submit the requested closure related information, neither this agreement nor the subsequent actions are intended, nor shall they actually waive FERMCO's objections to such action based on exemption from these requirements under CERCLA.

COMMENT DISPOSITION RECORD

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Reviewer: U.S. EPA

#	COMMENT	PROPOSED DISPOSITION
GENERAL COMMENTS		
1	<p>The U.S. Department of Energy (DOE) removal action (RA) work plan proposes to remove, store, and treat about 100 gallons of waste from the Nitric Acid Tank Car. This waste is resource Conservation and Recovery Act (RCRA) hazardous for corrosivity and may exhibit other RCRA characteristics. If the waste is toxic by characteristic under the toxicity characteristic leaching procedure (TCLP), DOE proposes to treat the waste with the uranyl nitrate hexahydrate (UNH) undergoing treatment in RA No. 20. Treatment of a RCRA characteristic waste that exhibits TCLP characteristics would require an approved RCRA treatment permit for the UNH system unless the system meets the definition of a totally enclosed treatment unit. DOE should provide further information on the nature of the waste material and the status of the UNH system if it intends to use the system to treat waste.</p>	<p>Analyses indicate the presence of chromium and uranium in the Tank Car contents. Accordingly, the Tank Car contents will be transferred to the UNH processing system (Removal Action 20) for treatment and disposal.</p> <p>The UNH system is an ongoing removal action involving the processing of material with characteristics similar to those of the Tank Car. Transfer of the Tank Car contents to the UNH system is consistent with the volume and toxicity reduction objectives discussed in the NCP. The scope of the Nitric Acid Tank Car Removal Action No. 25 is limited to the transfer of the Tank Car contents to the UNH system. The responsibility for treatment and disposal of the Tank Car contents is assigned to the Removal Action No. 20 UNH System. The Removal Action No. 20 Information Package identifies exempted permits, permitting standards, and demonstrates that Removal Action No. 20 will comply with those standards.</p> <p>Additional detail will be added to the work plan regarding the specific treatments implemented by the UNH treatment system. The UNH system located in Plant 2/3 is used to concentrate the solutions of UNH into a stable filter cake. The UNH solution is blended into a uniform mixture, pH adjusted and precipitated using magnesium hydroxide or lime. The above will be filtered through a rotary vacuum filter press. The semi-solid material will be drummed.</p> <p>In any event, the Nitric Acid Tank Car and Area removal action is exempt from RCRA permitting requirements under the CERCLA, 42 U.S.C. 9602 <i>et. seq.</i> As such, although the UNH process does not meet the definition of a totally enclosed system, a RCRA treatment permit is not required.</p> <p>Affected pages: 3-5.</p>

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Reviewer: U.S. EPA

2	DOE proposes an alternate approach if the waste is not TCLP characteristic: the waste would be stored with lime in Tank No. 17, which in effect would treat the waste by elementary neutralization. If the waste is not TCLP characteristic but it is corrosive, placing it in Tank No. 17 would constitute treatment; however, this may be considered elementary neutralization, which would make the treatment process RCRA exempt. EPA believes that this approach may be acceptable.	Analyses now available indicate concentrations of chromium in excess of the TCLP limits in the Tank Car contents. As such the Tank Car contents will be transferred to the UNH system following removal from the Tank Car.  Affected pages: 3-5, 3-16.
SPECIFIC COMMENTS		
1	Attachment 5, Page 4-6, Paragraph 2. The text states that RCRA land disposal restrictions (LDR) are not applicable. However, LDR requirements are applicable because LDR regulations apply to on- and off-site storage, treatment, or disposal of RCRA waste. If a waste is TCLP characteristic, it should be treated in accordance with the Best Designated Available Technology (BDAT) and meet LDR treatment standards. DOE should also certify that the waste has been treated to meet LDR standards and should retain records for 5 years following treatment.	The referenced text will be revised to indicate that the wastes will be treated, as appropriate to meet LDR standards.  Affected pages: Attachment 5, 4-6.
RADIATION COMMENTS		
1	Section 2.2, pg 2-2, line 20: For clarity, the permissible limit in both DOE Order 5400.5 and 10 C.F.R. 20.2003 for release of natural uranium to a sanitary sewer should be stated in this section.	These limits will be presented in this section.  Affected pages: 2-2.
2	Section 3.3.2.3, pg 3-28: The figure on page 3-28, "Sample locations for Nitric Acid Tank Car HWMU and area," should probably be denoted as Figure 3-3 rather than Figure 3-1.	Correction will be made.  Affected pages: 3-30.
3	Section 3.3.2.3, Pg 3-29, Para 2: In addition to soil sampling, a radiation contamination walkover survey of the area within the HWMU should be performed once the Tank Car is removed from the HWMU. This would assist in concluding whether past practices related to the Tank Car have resulted in radiological contamination within the HWMU. Results of such a walkover survey may be of use in determining locations for sampling if radiological contaminations is indeed found.	A radiation walkover survey will be conducted in this area prior to soil sampling activities following removal of the Tank Car.  Affected pages: 3-29.

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Reviewer: U.S. EPA

4	<p>Section 4.0, Pg 4-1, Para 1: Since the HWMU has contaminants considered as mixed waste, a certified health physicist (CHP), in addition to a professional engineer (PE), should certify that the HWMU was closed to ensure that radiological issues were addressed.</p>	<p>The FEMP agrees to provide certification that the Nitric Acid Tank Car and Area Removal Action No. 25 was completed in accordance with this plan. Radiological issues, as identified in this plan, will be dealt with in accordance with the FEMP Radiological Control Manual, and associated standard operating policies and procedures. Although a CHP will not review these specific actions, the guiding documents are subject to extensive professional Health Physicist review prior to approval and implementation.</p> <p>Affected pages: 4-1.</p>
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