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CONDITIONAL
APPROVAL OF THE EE/CA FOR REMOVAL ACTION #~~1~~2 7 - MANAGEMENT OF CONTAMINATED STRUCTURES

01/19/93

OEPA/DOE-FN
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LETTER

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
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G-01740 AR

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George V. Voinovich
Governor

January 19, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the EE/CA for Removal Action #27 - Management of Contaminated Structures. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments attached. If you have any questions about these comments please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/bjb

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Jim Saric, U.S. EPA
Dennis Carr, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

(juke(s)) partial action response to doe-0616-93 (5463)

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OEPA COMMENTS
RA #27 EE/CA

General Comment

1. The EE/CA contains no schedule commitment on the part of DOE. The document should at a minimum include a proposed schedule and a commitment for the date of submittal of the first D&D work plan.

Specific Comments

1. Executive Summary - Because integration between this EE/CA and other removal actions is critical for success, the four removal actions(9,12,17,26) should be mentioned in a brief paragraph in the Executive Summary.

2. Section 1.3, pg. 6, 1st line: A reference for this document should be provided in Section 7.0.

3. Section 2.3, pg. 43, last paragraph: The significance of the "*" within this paragraph is unclear. If it's a typo, please correct. If not, please clarify.

4. Table 2-7, pg. 53: The table should include both DOE and NRC criteria if they differ.

5. Section 4.1.5, pg. 73, 4th paragraph: The paragraph suggests oil and gas will be incinerated and the residue shipped off-site for disposal as LLW. The document fails to discuss this incineration in any more depth. On-site incineration will require complying with ARAR's and permits in accordance with the Ohio/DOE Consent Order. If DOE is considering on-site incineration, additional detail must be provided within the EE/CA.

6. Section 4.1.7, pg. 75, 3rd paragraph: Since DOE is unable to dispose of mixed waste at this time, every effort must be made to minimize the generation of such wastes. The use of rags and/or cleaning agents which result in additional mixed waste generation must be a last choice option.

7. Section 4.1.7, pg. 76, 3rd paragraph: It is unclear the justification for the assumption that most transite sheets and insulation can be disposed of at an off-site landfill. It would seem the level of contamination within the production area and the airborne deposition of uranium contamination onto structures would assure most transite is contaminated. Additionally, if it is assumed most of the transite is not contaminated, then why is it assumed all lead bolts are mixed wastes.

8. Table 4-1, pg. 79, Thermal Treatment: The off-site designation in this table doesn't appear to agree with the text in section 4.1.5 (see comment 5 above). Please clarify the off-site vs. on-site incineration issue.

9. Section 5.4, pg. 94: This section should include a more in depth discussion of ARARs and TBC associated with disposition of wastes (e.g. free-release criteria, criteria for disposal of transite at an off-site landfill, etc.).