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*CONDITIONAL APPROVAL OF THE MAWS
TREATABILITY STUDY WORK PLAN*

05/06/93

OEPA/DOE-FN

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LETTER



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

May 6, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

The purpose of this letter is to conditionally approve the MAWS Treatability Study Work Plan. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments listed below:

OEPA DHWM reserves the right to request additional information or documentation regarding any RCRA hazardous waste management issues resulting from this project. Please supply the following information to OEPA DHWM Southwest District Office:

1. Tank specifications and drawings of tanks described in Section 4.3.1 used to store Pit 5 wastes.
2. Tank specifications and drawings of feed blending station tanks described in Section 4.3.2 used to blend waste streams and additives.
3. Specifications and drawings of "strong-type" boxes referenced in Section 3)(1)(k) of Appendix A, used for secondary containment of waste drums.

In addition, OEPA DHWM has the following comment regarding the MAWS Revision No. 2 document:

4. Section 1.2.2 (Extent of Contamination in Waste Pit 5) concludes with a characterization of Pit 5 material as a listed hazardous waste (F002), based upon in-plant usage of TCA and TCE solvents and application of the RCRA "mixture" and "derived from" rules. This section, however, still does not adequately address the hazardous waste characterization issues outlined in comment #1 of the OEPA DHWM review of MAWS Revision 1. In regard to the characterization data presented from the CIS program (Weston 1987):

- * Are the values for the inorganics in Table 1-2 expressed in total metals concentrations?
- * EP-TOX data is presented in Table 1-3 for three inorganics. Were the remaining RCRA inorganics subjected to EP-TOX analysis? If not, what justification was employed to select only these three inorganics for EP-TOX analysis?

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- * Table 1-4 lists detectable concentrations of organic contaminants and the narrative within Section 1.2.2 states these (except for Aroclor 1254) were attributed to laboratory contamination. What is the rationale (e.g. follow-up sampling event, analytical QA/QC validation) used to justify this position?

These questions are raised for the following reason. OEPA DHWM expects the MAWS study, and any future treatment proposals under CERCLA activity, to contain a thorough explanation of the hazardous waste characterization process and the basis for hazardous waste determinations.

If you have any questions about these comments, please contact Phil Harris or me.

Sincerely,



Graham E. Mitchell
Project Manager

GEM/klj

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