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**OHIO EPA COMMENTS ON THE OPERABLE
UNIT 3 TREATABILITY STUDY WORK PLAN**

01/31/94

**OEPA/DOE-FN
15
COMMENTS
OU3**



State of Ohio Environmental Protection Agency

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5122

George V. Voinovich
Governor

January 31, 1994

Re: OU3 TREATABILITY
STUDY WP

Mr. Jack Craig
Project Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

Dear Mr. Craig:

Attached are Ohio EPA's comments on DOE's OU3 Treatability Study Work Plan submitted on December 23, 1993.

If you should have any questions, please contact Tom Schneider.

Sincerely,

Graham E. Mitchell
Project Manager

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Mike Proffitt, DDAGW
Jim Saric, U.S. EPA
Ken Alkema, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

HALL(J)
PARTIAL ACTION
RESPONSE
TO
R-0639
(7373)

OHIO EPA COMMENTS
ON
OU3 TREATABILITY STUDY WP

- 1) Commenting Organization: Ohio EPA Commentor: DERR
Section #: General Comment Pg #: Line #: Code: c
Original Comment #:
Comment: Please enclose a map showing the location of the buildings under consideration for the treatability study.
Response:
Action:

- 2) Commenting Organization: Ohio EPA Commentor: DERR
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: Will all of the individual components of the asbestos containing material consist of the same amount of asbestos fibers? In other words, will all of the pipe insulation site-wide contain the same amount of asbestos; will all of the floor tiles site-wide contain the same amount of asbestos, etc? Varying amounts of asbestos fibers in each location could alter study results.
Response:
Action:

- 3) Commenting Organization: Ohio EPA Commentor: DERR
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: Sections 1-15 seem to contain numerous references to other documents and procedural outlines, but do not contain much information directly mentioning the OU3 plan. The sections in the front of the document do not present enough data to make the review worthwhile. The study would be easier to understand if the sections were condensed and irrelevant data deleted. The "meat and potatoes" of the study lies in the appendices.
Response:
Action:

- 4) Commenting Organization: Ohio EPA Commentor: DERR
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: DOE should build on the information available at other DOE complexes. Vitrification is ongoing at DOE's Rocky Flats plant. Bench and pilot test data should be available. FEMP should not reinvent the wheel if possible.
Response:
Action:

- 5) Commenting Organization: Ohio EPA Commentor: DERR
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: DOE should evaluate the need for treating ACM. If this material could be used as feed in the vitrification process, then there is no need to spend money abating contamination when it would not be

OEPA Comments
 January 31, 1994
 Page 3

necessary?
 Response:
 Action:

- 6) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: DOE will need to state the criteria waste/material will need to meet before being "free released" or recycled. It is Ohio EPA's understanding that no criteria exist for volumetricly contaminated materials. DOE should incorporate the criteria which will be used to make disposal decisions within the treatability study work plan.
 Response:
 Action:
- 7) Commenting Organization: Ohio EPA Commentor: Geotrans
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: There is no indication in the TSWP of the extent of the RI activities completed to date. The treatability study is normally initiated following, at least, the completion of the first phase of the RI. A section of the document should summarize the level of data gathered to date and its adequacy to warrant the initiation of this TSWP.
- 8) Commenting Organization: Ohio EPA Commentor: Geotrans
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: The treatability test goals, experimental design, equipment, materials, and budget should be included as integral parts of the TSWP in each treatability test.
- 9) Commenting Organization: Ohio EPA Commentor: Geotrans
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: Distinction should be made between technology types and process options. Table 2-1 specifies process options for several technology types, while table A-1 list those same process options as remedial technologies.
- 10) Commenting Organization: Ohio EPA Commentor: Geotrans
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: The TSWP should discuss the budget for the completion of the remedy selection treatability study. The budget must include major cost elements associated with remedy selection.
- 11) Commenting Organization: Ohio EPA Commentor: Geotrans
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:

OEPA Comments
January 31, 1994
Page 4

Comment: The headings "Remedy Design" and "Remedy Selection" (section 4.0) are actually "Remedy Design Goals" and "Remedy Screening Goals," respectively, and should be changed accordingly. The TSWP Remedy Design should be revised to include Remedy Screening Tier (such as particle size, solubility, miscibility, dispersibility, contaminants, selection of most prevalent contaminants, etc.), and the Remedy Selection Tier (such as availability of power supply, materials, equipments, precision, RREL search, ratios, additives, test duration, variability in grain size, holding time, etc.)

- 12) Commenting Organization: Ohio EPA Commentor: Geotrans
Section #: General Comment Pg #: Line #: Code: C
Original Comment #:
Comment: The test objectives (goals) for each treatability test should include specific "Remedy Screening Goals" and Remedy Selection treatability study goals. This applies to the TSWP for chemical conversion of ACMs, chemical leaching, vitrification of ACMs, and vitrification of mixed waste.
- 13) Commenting Organization: Ohio EPA Commentor: Geotrans
Section #: 1.2.1.4 Pg #: 1-7 Line #: 13 Code: C
Original Comment #:
Comment: The text states that the metals involved in the study are contaminated mostly on the surface. Is it possible for the metals to be contaminated throughout? How will the extent of contamination be determined and the effectiveness of the treatment technology?
Response:
Action:
- 14) Commenting Organization: Ohio EPA Commentor: Geotrans
Section #: 1.2.1.5 Pg #: 1-8 Line #: 12 Code: C
Original Comment #:
Comment: Please provide a definition of inconel and monel.
Response:
Action:
- 15) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 1.2.1.8 Page #: 1-9 Line #: Code: C
Original Comment #:
Comment: The railroad ties are generally treated with creosote and therefore are suspected, along with the top 6 inches of underlying soils, to be contaminated with creosote. A clarification as to whether or not those timber ties and affected soils have been characterized during the RI efforts should be included.
Response:
Action:
- 16) Commenting Organization: Ohio EPA Commentor: DERR

OEPA Comments
January 31, 1994
Page 5

Section #: 1.2.1.11 Pg #: 1-10 Line #: 13 Code: C

Original Comment #:

Comment: Part of the backlog is from past manufacturing activities. Where and how is this waste being stored?

Response:

Action:

17) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 1.2.2 Page #: 1-11 Line #: 19 Code: E

Original Comment #:

Comment: Insert the word "nature" after "regarding the"

Response:

Action:

18) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 1.4 Page #: 1-12 Line #: 25 Code: E

Original Comment #:

Comment: The last statement of this section should be revised to state that the treatability studies will be conducted to ensure that selected remedial technologies comply (rather than are in accordance) with ARARs.

Response:

Action:

19) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 1.4 Pg #: 1-12 Line #: 22 Code: E

Original Comment #:

Comment: Typographical error.

Response:

Action:

20) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 1.4.3 Page #: 1-15 Line #: Code: C

Original Comment #:

Comment: The last paragraph should be refined to show how the treatability study would aid in the selection of the most applicable remedial alternatives (based on CERCLA evaluation criteria) during the FS.

Response:

Action:

21) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 2.2 Page #: 2-3 Line #: 22 Code: C

Original Comment #:

Comment: The "Secondary Waste Generation" is normally considered, during the remedy selection, as part of the "Effectiveness" criterion and not as a fourth criterion (RI/FS guidance document). Also, Overall Protection of Human Health and the Environment as well as Compliance with ARARs should be included as part of the Effectiveness criterion during this

OEPA Comments
January 31, 1994
Page 6

phase of screening (refer to EPA 88, Sec 4.3.2).

Response:
Action:

- 22) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 2.3 Page #: 2-5 Table #: 2.1 Code: C
Original Comment #:
Comment: A column for "General Response Actions" should be added to the table. The no action, Treatment/Decontamination, Dismantlement/Removal, and Disposition/Recycling are all General Response Actions and should be part of this new column. Surface removal, volumetric decontamination, etc. should be retained under "Technology Types".

Response:
Action:

- 23) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 3.1.1 Pg #: 3-2 Line #: 10 Code: C
Original Comment #:
Comment: The text states that "Materials which are judged to have surface contamination levels within the range of background may be released without restrictions..." Please describe how the materials are sampled and measured for radiation. Also describe the determination of background levels.

Response:
Action:

- 24) Commenting Organization: OEPA Commentor: GeoTrans
Section #: Page #: 3-2 Line #: 26 Code: C
Original Comment #:
Comment: The intended meaning of the second sentence in the last paragraph is not clear. Please explain how the establishment of concentration for the media would define background levels that will be remediated under OU3.

Response:
Action:

- 25) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 3.2 Pg #: 3-3 Line #: 14 Code: C
Original Comment #:
Comment: Expand on the statement "Specific [radionuclides] may be stated as test goals; but not meeting these goals does not mean the technology is ineffective or that the test site has not met the stated objectives." This idea is not fully discussed. DOE will need to clarify its position on this idea.

Response:
Action:

- 26) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 3.4 Page #: 3-4 Line #: Code: C

OEPA Comments
January 31, 1994
Page 7

Original Comment #:

Comment: The following additional objectives should be included:

- Demonstrate that residual risks are controllable.
- Demonstrate that the technology would achieve permanent reduction of risk to human health and the environment.

Response:

Action:

- 27) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 4.2 Page #: 4-2 Line #: 12 Code: E
Original Comment #:
Comment: The "S" in the term ARARS should not be capitalized.
Response:
Action:
- 28) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 4-2 Page #: 4-2 Line #: Code: C
Original Comment #:
Comment: The following goals should be distinguished as integral parts of the treatability study selection:
• Measure of the percentage of contaminants that can be destroyed or removed from treated media.
• Produce the design information required for the next level testing, should the remedy selection evaluation indicate that remedy design studies are warranted.
• Ensure that the removal efficiency, achieved by the technology, will meet site cleanup goals, based on the risk assessment and ARARS.
Response:
Action:
- 29) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 4-3 Page #: 4-3 Line #: Code: C
Original Comment #:
Comment: Please explain why the Remedy Design was excluded from this TSWP. The remedy design tests are essential in designing the full-scale unit, optimizing the performance of technologies, refining cleanup time estimates, and refining cost estimates. This tier of testing is necessary for this project, due to the number of innovative (evolving) technologies considered.
Response:
Action:
- 30) Commenting Organization: Ohio EPA Commentor: DERR
Section #: 6.2 Pg #: 6-3 Line #: 22 Code: C
Original Comment #:
Comment: The idea of "unconventional sampling techniques" needs to be expanded. Describe the techniques and justification for their use. Provide insight on DOE's definition of "unconventional sampling techniques."

OEPA Comments
 January 31, 1994
 Page 8

Response:
 Action:

31) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 6.4.2.1, 6.4.2.2 Pg #: 6-11,12 Line #: Code: C
 Original Comment #:
 Comment: This whole document is filled with references to the location of certain information. Perhaps brief summaries of what will be found in the referenced documentation will give a little more depth to the document. An example of this excessive referencing is on the noted pages. These sections contain no content, just referral information.
 Response:
 Action:

32) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: 7.1 Page #: 7-1 Line #: Code: C
 Original Comment #:
 Comment: The discussion regarding entry into the laboratory logbook should include additional specific items such as the correction procedures, signing of the logbook at the beginning and end of day, and the logbook transfer process. Conformance with the EPA recording procedures is required and need to be followed.
 Response:
 Action:

33) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: 8.1.3 Page #: 8-4 Line #: Code: C
 Original Comment #:
 Comment: Additional data that should be part of the presentation may include:
 • Effectiveness on wet versus dry condition of tested materials.
 • Effects of the process design variables on the treatment.
 • Reduction of contaminants concentration as a function of time.
 Response:
 Action:

34) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: 8.2 Page #: 8-5 Line #: Code: C
 Original Comment #:
 Comment: The data interpretation should also include:
 • Determination of removal efficiency as a function of treatment duration
 • Variability in tests and impact on the full-scale treatment
 • Reasons for deviation from anticipated results.
 Response:
 Action:

OEPA Comments
 January 31, 1994
 Page 9

- 35) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 10.1.3 Pg #: 10-3 Line #: 1 Code: C
 Original Comment #:
 Comment: There is a discrepancy in the exact title of the "Federal Facilities Agreement for Control and Abatement of Radon-222 Emissions." "Control" appears in the first reference to the agreement, while "Care" appears in the next reference.
 Response:
 Action:
- 36) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 12 Pg #: 12-1 Line #: Code: C
 Original Comment #:
 Comment: Please provide more detailed information concerning the CRP.
 Response:
 Action:
- 37) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: 13 Page #: 13-1 Line #: Code: E
 Original Comment #:
 Comment: This section should include a statement to satisfy the OERR requirement that a copy of the treatability study reports be submitted to the Agency's Superfund Treatability Data Base repository.
 Response:
 Action:
- 38) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: 13 Page #: 13.2 Line #: Table 13.1 Code: C
 Original Comment #:
 Comment: The suggested treatability study report should include sections on staffing, cost, and schedule.
 Response:
 Action:
- 39) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: 14.1 Pg #: 14-2 Line #: Code: G
 Original Comment #:
 Comment: The Treatability Study Milestone Chart is difficult to understand. The calendar does not match the text. Please correct this timetable.
 Response:
 Action:
- 40) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: 14 Page #: 14-2 Line #: Fig. 14.1 Code: E
 Original Comment #:
 Comment: The Treatability Study Milestone Chart is missing legends.
 Response:
 Action:

OEPA Comments
January 31, 1994
Page 10

- 41) Commenting Organization: OEPA Commentor: GeoTrans
Section #: 15 Page #: 15-2 Line #: Fig. 15.1 Code: C
Comment #:
Comment: Missing from the Treatability Study Management and Staffing is a box for the EPA Remedial Project Manager. Also, this work plan needs to identify the personnel responsible for executing the treatability study by name (if available) and qualifications. Specific expertise should be identified, such as: work assignment manager, chemist, engineer, geologist, and lab technician. The responsibility for various aspects of the project should be shown in the organization chart.
Response:
Action:
- 42) Commenting Organization: OEPA Commentor: GeoTrans
Section #: Appendix A Page #: A-6 Line #: Table A.1 Code: E
Original Comment #:
Comment: The vapor extraction process is considered a demonstrated technology and should not be classified as an evolving technology.
Response:
Action:
- 43) Commenting Organization: OEPA Commentor: GeoTrans
Section #: Appendix A Page #: A-12 Line #: Table A.2, A.3 Code: E
Original Comment #:
Comment: The name of the remedial technology types is missing for several media identified in the table. Also, several of the identified technologies are actually process options and need to be listed.
Response:
Action:
- 44) Commenting Organization: Ohio EPA Commentor: DERR
Section #: B.2 Pg #: Line #: Code: C
Original Comment #:
Comment: The treatability work plan does not sufficiently address the radioactive aspects of the asbestos. Will radioactivity somehow alter the ABCOV method, or will the radionuclides have no effect on the process?
Response:
Action:
- 45) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App B Pg #: B-2 Line #: 18-19 Code: C
Original Comment #:
Comment: Removal techniques for the ACM will be the same regardless of the final disposition. All ACM will have to have surfactant applied and sufficiently wetted during and after removal. The ABCOV method only

OEPA Comments
 January 31, 1994
 Page 11

replaces the conventional disposal method costs.

Response:

Action:

- 46) Commenting Organization: OEPA Commentor: GeoTrans
 Section #: Appendix B Page #: B-6 Line #: Code: E
 Original Comment #:
 Comment: The location-specific ARARs and TBCs are not considered in Table D-6. Although no location-specific ARARs may be applicable to the TS, potential ARARs and TBCs should be identified, considered, and then rejected. This comment is also applicable to Appendices C, D, and E.
- Response:
 Action:
- 47) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: B.2.3 Pg #: B-9 Line #: 10 Code: C
 Original Comment #:
 Comment: How were these steps formulated? Are these recommended steps by the manufacturer or were they developed by FEMP?
- Response:
 Action:
- 48) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: B.4.1.8 Pg #: B-19 Line #: Code: C
 Original Comment #:
 Comment: The summaries included in each of the treatability options need simplification and clarification. They are difficult to understand in their current form.
- Response:
 Action:
- 49) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: Table B.4.2 Pg #: B-24 Line #: Code: C
 Original Comment #:
 Comment: The chart lists analytical instrumentation for an air matrix as Tennelec. Please describe Tennelec instrumentation.
- Response:
 Action:
- 50) Commenting Organization: Ohio EPA Commentor: DERR
 Section #: App B Pg #: B-28 Line #: 7-12 Code: c
 Original Comment #:
 Comment: DOE does not indicate if any listed waste products will be produced by the ABCOV method. There is the potential to produce mixed waste from this process if the spent ABCOV solutions are listed or characteristic and are used to treat rad contaminated material.
- Response:
 Action:

OEPA Comments
January 31, 1994
Page 12

- 51) Commenting Organization: OEPA Commentor: GeoTrans
Section #: Appendix B Page #: B-47 Line #:10 Code: E
Original Comment #:
Comment: A total volume of 750 gallons of residual materials is listed in the text. However, Table B.8.1 shows that estimated volume totals 1,400 gallons. Please verify the discrepancy.
Response:
Action:

- 52) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App B Pg #: B-49 Line #: 19 Code: c
Original Comment #:
Comment: DOE is being very optimistic on the operational lifespan of a HEPA filter. Operational life can sometimes be as short as a few days depending on the load the filter is subjected to.
Response:
Action:

- 53) Commenting Organization: Ohio EPA Commentor: DERR
Section #: C Pg #: C-1 Line #: 18 Code: C
Original Comment #:
Comment: Appendix C states that concrete will be treated by scabbling (surface removal) and then chemical leaching. Section 3.1.2 describes concrete as volumetrically contaminated media (spread throughout the depth of the media.) If concrete is volumetrically contaminated, scabbing and chemical leaching is not a viable alternative. Please describe and clarify this discrepancy. Rebar in reinforced concrete provides liquid contaminates a transport mechanism. Contamination may exist in concrete where surface conditions do not. DOE will need to address this problem.
Response:
Action:

- 54) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App C Pg #: C-7 Line #: 28 Code: c
Original Comment #:
Comment: a) DOE needs to explain why a reduction of rad concentration by 80% will be considered effective. The remaining material will still be low-level wastes and will required to be handled as such.
b) If the chemical leaching process creates a mixed waste (e.g., makes inorganic contaminants more mobile) stream then DOE is creating a bigger problem then what originally existed.
c) DOE should also analyze for TCLP semi-volatiles. By only analyzing for leachable metals DOE is not verifying the true nature of the media.
Response:
Action:

- 55) Commenting Organization: Ohio EPA Commentor: DERR
Section #: C.2.1 Pg #: C-10 Line #: 15 Code: C

OEPA Comments
January 31, 1994
Page 13

Original Comment #:
Comment: Where did the original set of constants originate? The constants in following sections come from experimentation already performed. Were the original constants recommended by a manufacturer, vendor or formulated by FEMP?
Response:
Action:

56) Commenting Organization: OEPA Commentor: GeoTrans
Section #: C.3 Page #: C-20 Table #: C.3.1 Code: C
Original Comment #:
Comment: The decontamination fluid (to clean beakers, plastic containers, spatula, reagent storage/dispensing bottles, etc.) should be listed. Also sample holding times and storage temperature should be listed.
Response:
Action:

57) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App C Pg #: C-22 Line #: 9 Code: c
Original Comment #:
Comment: Add to end of sentence "and/or mixed waste".
Response:
Action:

58) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App C Pg #: C-30 Line #: 21-23 Code: c
Original Comment #:
Comment: DOE will need to verify, through analytical testing, the final matrix product's chemical nature after being subjected to the leaching solution.
Response:
Action:

59) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App C Pg #: C-55 Line #: 17 Code: c
Original Comment #:
Comment: Why is DOE over-packing the drums at this time?
Response:
Action:

60) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App C Pg #: C-56 Line #: Table Code: c
Original Comment #:
Comment: DOE's residual table does not reflect the 80% reduction of waste. DOE provides a table on page D-9 but the values are not comparable.
Response:
Action:

OEPA Comments
January 31, 1994
Page 14

- 61) Commenting Organization: Ohio EPA Commentor: DERR
Section #: App D Pg #: D-9 Line #: table Code: c
Original Comment #:
Comment: DOE provides volumetric measurements to show the volume reduction of waste, however, the quantity is not representative of the material. How will the material be placed in the containers to achieve the listed volume(eg pulverized, crushed, or whole).
Response:
Action:

- 62) Commenting Organization: Ohio EPA Commentor: DERR
Section #: D.2.2.2 Pg #: D-11 Line #: 3 Code: C
Original Comment #:
Comment: Provide information concerning the disposal of the cold cap.
Response:
Action:

- 63) Commenting Organization: Ohio EPA Commentor: DERR
Section #: D.2.2.2 Pg #: D-11 Line #: 5 Code: C
Original Comment #:
Comment: Describe what is meant by "foaming events" and if foaming will have a detrimental effect upon the vitrification of the waste.
Response:
Action:

- 64) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table D.7.1 Pg #: D-44 Line #: Code: C
Original Comment #:
Comment: Will Permits to Install and Permits to Operate not be required for the crucibles? Since the crucibles have the potential to emit contaminants, they should be permitted unless exempted.
Response:
Action:

- 65) Commenting Organization: Ohio EPA Commentor: DERR
Section #: E Pg #: E-1 Line #: 23 Code: E
Original Comment #:
Comment: Typographical error.
Response:
Action:

- 66) Commenting Organization: Ohio EPA Commentor: DERR
Section #: Table E.2.1 Pg #: E-8 Line #: Code: C
Original Comment #:
Comment: The text describes vitrification as "the process of melting silica-containing material at a very high temperature to form a non-porous solid (glass) which can immobilize and contain the material contained in the glass. Have preliminary tests been run on the substances listed in the table to determine if the proper amount of silica exists and, if not, how much will need to be added. In addition,

OEPA Comments
January 31, 1994
Page 15

will all of the materials listed be able to withstand a high temperature without the risk of fire or explosion?

Response:

Action:

67) Commenting Organization: Ohio EPA Commentor: DERR
Section #: F.1.1 Pg #: F-2 Line #: Code: C
Original Comment #:

Comment: It would be helpful if the sections regarding ~~REMP~~ Site History and Operable Unit 3 History were moved to the beginning of the document to provide necessary background. Maps of the study area should also be included in this section.

Response:

Action: