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**COMMENTS ON ANNOTATED OUTLINE FOR THE DRAFT SITE TREATMENT
PLAN**

06/06/94

OEPA DOE-FN
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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

June 6, 1994

John Sattler
U.S. DOE - Fernald
P.O. Box 398704
Cincinnati, Ohio 45239-8704

RE: Comments on Annotated Outline for the Draft Site Treatment Plan

Dear Mr.  Sattler:

Following are Ohio's collective comments on DOE's Outline for the Draft Site Treatment Plan. Overall, the background volume of the annotated outline appears to be appropriately arranged to cover all necessary aspects identified by the State. The basic structure and content is acceptable, with a few minor modifications. We would also like to further discuss the plan volume with the Ohio sites at our June 6 meeting before offering any further comments on it other than those listed below.

Page 2, Section 2.3 - Coordination with Stakeholders (Background)
Section 2.3 should include a description of the site specific activities which will occur to inform stakeholders of ongoing or planned site activity. A list or summary table including neighborhood groups, associations, etc. should be included in this section or as an appendix. The background volume should identify the magnitude of the public involvement process that has taken place at the site thus far, in order to put information from stakeholders in its proper perspective. The background volume should also identify activities at the state level (in addition to activities at the National and at the site level). Meetings, phone calls, and other request for information can be documented in the form of charts or lists indicating the number of contacts (such as phone calls or meetings) that have occurred with stakeholders and the manner in which the site responded to these requests.

John Sattler
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Page Two

Page 7, Section 7.0 - Storage Report (Background Volume)

The DSTP outline should also require, where appropriate, how information on low-level mixed waste will be managed at unpermitted sites. Some sites may not have a permit, or may not have sufficient additional design capacity for the storage of low-level mixed waste streams to be generated. Less than ninety (90) days accumulation requirements (labelling, aisle space, weekly inspections, etc.) should be addressed for sites which may manage low-level mixed waste for ninety (90) days or less.

Page 8, Section 2.1 - Approach to Setting Milestones (Plan Volume)

This section describes the site's preferred process for establishing enforceable milestones. The site and the regulatory agency should discuss these at length before they appear in the plan, thereby giving the regulatory agency advanced opportunity to put forth its own proposals for establishing milestones.

Page 8 & 9, Section 3.1 - Mixed Waste Streams for which Technology Exists (Plan Volume)

This section provides a general list of relevant activities that will serve as the basis of estimated schedules for bringing facilities on-line and treating waste. Somewhere on this list, or in the outline itself, DOE needs to address the establishment of procedures and the timing of treatment for waste received from offsite. For example, if Site A is the regional treatment site for specific waste streams from Sites B & C, which facility (Site A or Site B) that is sending waste to Site A will get priority in terms of the timing of treatment of its waste? This will need to be determined in order to establish milestones for implementation of treatment.

Should you have any questions on these comments please feel free to contact me or Judy (Brazis) Springer at (614) 644-2956.

Sincerely,



Michael A. Savage, Assistant Chief
Division of Hazardous Waste Management

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Page Three

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