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R-023-207 .5

DOE FEMP MSL #531-0297 RA 20 UNH WP - COMMENTS

07/26/94

OEPA DOE-FN
3
COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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LOG H-5090-25798
JUL 23 9 12 AM '94
George V. Voinovich
Governor

July 26, 1994

5793

RE: DOE FEMP
MSL #531-0297
RA 20-UNH-WP-
COMMENTS

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

R-023-207.5

Dear Mr. Craig:

This letter provides Ohio EPA comments on the Removal Action Workplan for Uranyl Hexahdrate Neutralization, Removal Action Number 20 submitted to Ohio EPA on June 21, 1994. The document should be revised to incorporate these comments and re-submitted for agency review. Ohio EPA is available to meet to resolve these comments in order to expedite resolution and initiation of work.

If you should have any questions, please contact Tim Hull, Phil Harris, or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

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

(TRYGIER(J)
PARTIAL
ACTION RESPONSE
TO R-1825
(8088)

OHIO EPA COMMENTS ON
UNH REMOVAL ACTION WP

- 1.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: c
 Original Comment #:
 Comment: This document would be more user friendly if tables and charts were to follow their first reference in the text. Please modify this document accordingly.
 Response:
 Action:

- 2.) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.1 Pg #: 5 Line #: Code: c
 Original Comment #:
 Comment: Please clarify in the text at what time the UNH Processing Team will conduct laboratory tests on the tank contents (i.e. prior to full scale mobilization of removal action #20, or after full scale mobilization?). If this time is indeed after full scale mobilization, why not conduct the laboratory tests prior to mobilization to ensure that appropriate neutralization can adequately be achieved.
 Response:
 Action:

- 3.) Commenting Organization: Ohio EPA Commentor: DHWM
 Section #: 2.1 Pg #: 5 Line #: Code: c
 Original Comment #:
 Comment: Information in this section regarding proposed processing tanks F1-25 and F1-26 is not clear with respect to secondary containment issues for these tanks. The 4th bullet on page 5 reads "The location of the tanks inside the building provides improved containment in the event of a tank failure". Please provide additional information to indicate the ability of the processing tanks to meet the secondary containment provisions of hazardous waste regulations.
 Response:
 Action:

- 4.) Commenting Organization: Ohio EPA Commentor: DHWM
 Section #: 2.1.1 Pg #: 6 Line #: Code: c
 Original Comment #:
 Comment: The project plan calls for a hydrostatic test of tanks F1-2 and F1-26. It would seem the test should also apply to tank F1-25.
 Response:
 Action:

- 5.) Commenting Organization: Ohio EPA Commentor: DHWM
 Section #: 2.3 Pg #: 9 Line #: Code: c
 Original Comment #:
 Comment: Information given appears to indicate tanks F1-25 and F1-26 are to be equipped with

