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U-003-305 .35

**OHIO EPA COMMENTS ON THE OPERABLE UNIT 1 DEEP  
TREATABILITY STUDY WORK PLAN**

07/15/94

531-0297

OEPA

DOE-FN

6

COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

July 15, 1994

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RE: DOE FEMP  
MSL #531-0297  
OU1 DEEP Tr-WP  
COMMENTS

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

V-003-305.36<sup>35</sup>

Dear Mr. Craig:

This letter provides Ohio EPA comments on the Operable Unit 2 DEEP Treatability Study Work Plan 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 field work.

If you should have any questions, please contact Tim Hull 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
- Mike Proffitt, DDAGW

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Ohio EPA Comments  
on  
OU1 DEEP Treatability Study WP

- 1.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 1.1            Pg #: 1-1            Line #:            Code: c  
 Original Comment #:  
 Comment: Paragraph #2 of this section states that radioactive waste consisting of naturally-occurring radionuclides generated from uranium ore processing are stored in OU1. Not all of the radionuclides found in OU1 are naturally occurring. Please modify the text accordingly.  
 Response:  
 Action:
  
- 2.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 1.2            Pg #: 1-2            Line #: 2            Code: c  
 Original Comment #:  
 Comment: This section states that waste pit 1,2, and 3 were selected for the DEEP. Yet, no rationale is given in the text as to why these waste pits were selected over the other waste pits. Please explain.  
 Response:  
 Comment:
  
- 3.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 1.3.3            Pg #: 1-3            Line #: 7            Code: c  
 Original Comment #:  
 Comment: The third bullet cross-references a section in which the physical features of Waste Pits 1,2 and 3 are described in further detail. The appropriate section number has been omitted. Please modify accordingly.  
 Response:  
 Action:
  
- 4.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 1.4.2            Pg #: 1-5            Line #:            Code: c  
 Original Comment #:  
 Comment: This section states that magnetic anomalies were detected across 35% of Waste Pit #2. Please describe in further detail where these anomalies were detected as were the areas in the Waste Pit #1 discussion in section 1.4.1.  
 Response:  
 Action:
  
- 5.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 2.1.3            Pg #: 2-2            Line #:            Code: c  
 Original Comment #:

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Comment: Please explain the rationale for selecting sampling points around the anomalies in the waste pits. The goal of a treatability study is to see if preferred techniques will work on a larger scale. Since the waste pit anomalies would have to be addressed in the future, no treatability data would exist regarding the areas identified by the magnetic anomalies.

Response:

Action:

- 6.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.1.3      Pg #: 2-2      Line #:      Code: e

Original Comment #:

Comment: In the last sentence of this paragraph please change know to known.

Response:

Action:

- 7.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.1.4      Pg #: 2-3      Line #: 2      Code: e,c

Original Comment #:

Comment: Please delete the word drilling. Also, this sentence states that the approximate depth of the waste pit liner have been determined. Please include these liner depths in a discussion of the waste pit characteristics.

Response:

Action:

- 8.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.1.5      Pg #: 2-3      Line #:      Code: c

Original Comment #:

Comment: The third bullet in this section is very run on and unclear as if words and\ or additional sentences are missing. Please review and modify accordingly.

Response:

Action:

- 9.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: 2.2.2.1      Pg #: 2-5      Line #:      Code: c

Original Comment #:

Comment: The third paragraph in this section states that existing information will aid in determining waste pit liner depth. Yet, section 2.1.4 states that liner depths have already been determined. Please review and clarify which statement is correct and modify the text accordingly.

Response:

Action:

- 10.) Commenting Organization: Ohio EPA                      Commentor: OFFO

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Section #: 2.2.2.2 Pg #: 2-5 Line #: Code: c

Original Comment #:

Comment: This section states that drill cuttings will be placed on plastic sheeting and returned to the excavation site. Please discuss what will happen to the cuttings once they have been returned to the excavation site.

Response:

Action:

11.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2.2.2 Pg #: 2-5 Line #: Code: c

Original Comment #:

Comment: Please change the second to last sentence in paragraph #1 to read "Grouting of completed boreholes will conform to (OAC) 3745-09-10(A).

Response:

Action:

12.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.4 Pg #: 2-10 Line #: Code: c

Original Comment #:

Comment: Please add time of sample to the list of descriptive information described on sample labels.

Response:

Action:

13.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: Figure 2-1 Pg #: 2-21 Line #: Code: c

Original Comment #:

Comment: This figure is very light copy and was difficult to review in our copy. Please ensure a darker copy in the revised text.

Response:

Action:

14.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.1.2.3 Pg #: 3-3 Line #: Code: c

Original Comment #:

Comment: The last sentence in this section appears to be incomplete. Please review and revise the text accordingly.

Response:

Action:

15.) Commenting Organization: Ohio EPA Commentor: OFFO

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Section #: 3.1.2.4 Pg #: 3-3 Line #: Code: c  
Original Comment #:

Comment: The DOE must ensure that a trench backfill technique will be implemented which will result in soil permeability that is equal or less than the permeability prior to excavation. Please modify the text accordingly.

Response:  
Action:

16.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.1.2.5 Pg #: 3-3 Line #: Code: c  
Original Comment #:

Comment: Please describe in further detail the decon methods that will be implemented at the FEMP decon facility for DEEP equipment.

Response:  
Action:

17.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.1.4.2 Pg #: 3-6 Line #: Code: c  
Original Comment #:

Comment: Please include a schedule for the implementation of the Waste Pit #6 Drying Study.

Response:  
Action:

18.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.2 Pg #: 3-8 Line #: Code: c  
Original Comment #:

Comment: The Ohio EPA recommends not pumping water into the waste pits for waste reslurry. This process would create a pressure head within the waste pit. Due to the lack of knowledge regarding liner integrity, this procedure could cause contaminant migration. Also, the presence of heterogeneous contents within the waste pits decreases the likelihood of success of a slurry pump working on a large scale. DOE should re-evaluate the appropriateness of using a slurry pump in the DEEP treatability study.

Response:  
Action:

19.) Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 4.5.1 Pg #: 4-16 Line #: Code: e  
Original Comment #:

Comment: Located after the first sentence in this section is a repeated incomplete sentence which needs to be deleted. Please revise the text accordingly.

Response:

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Action:

20.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment                      Pg #:    Line #:                      Code: c

Original Comment #:

Comment: The document would be more user friendly if figures and tables were included within the text following its initial text reference in the appropriate sections. Please revise accordingly.

Response:

Action:

21.) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment                      Pg #:    Line #:                      Code: c

Original Comment #:

Comment: Document review would be made easier if DOE would use pages with numbered lines.

Response:

Action: