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**GENERAL COMMENTS ON THE DRAFT SITE TREATMENT PLANS  
(DSTP)**

10/19/94

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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovici  
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October 19, 1994

Ms. Patty Bubar, EM-5  
Environmental Restoration & Waste Management  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585

Dear Ms. Bubar:

Please find attached Ohio's general comments on the Draft Site Treatment Plans (DSTP) submitted at the end of August 1994. A copy of this correspondence is being forwarded to the sites in Ohio.

Site specific comments on individual DSTP's are being finalized and will be forwarded directly to the sites in the near future.

We remain hopeful that this early dialogue between DOE and the states will lead to a successful resolution to this important issue.

Sincerely,

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

wp51.MAS.lcn.bubar

**Attachments**

cc: Marilyn Stone, U.S. DOE  
Jerry Boese, Ross & Associates  
John Sattler, DOE-Fernald  
Robert Rothman, DOE-Mound  
Melda Rafferty, DOE-Ports  
Tom Baillieul, DOE-Battelle  
Marian Heffner, RMI  
Jill Litt, NGA  
Tom Winston, Chief, SWDO



DSTP's Ohio General Comments

1. As stated in the DSTP's they do not reflect evaluation by DOE of impacts on other DOE facilities or to the DOE program overall. The Options Analysis Team (OAT) effort should address this. How will the results of that evaluation be incorporated into individual site STP's?
2. Ohio recognizes DOE's current policy in handling TRU waste is through the WIPP project and as such DOE identifies that as its preferred (and only) option. DOE must address alternatives to WIPP in the STP(s) as a "plan B" if WIPP doesn't work out.
3. The DSTP's in general, do not account for the management of treatment residuals and secondary waste streams. Quantity estimates do not appear to be accounted for in projected estimates of waste to be managed. The STP's must address the issue of residual and secondary waste stream handling e.g., storage, disposal, further treatment and quantity estimates generated from individual waste treatment schemes.
4. The DSTP's do not provide sufficient narrative discussion as to how each of the treatment options received the scores it did for each of the rating criteria. The STP's must address in more detail the rationale behind the elimination of treatment options and the selection of the preferred option.
5. The DSTP's do not provide detailed technical information including process description and engineering drawings regarding proposed treatment processes. While Ohio understands it may be too soon for DOE to provide this information DOE must understand that detailed information on proposed treatment technologies will be required of DOE prior to the issuance of authorization to construct/operate. This information, if available, should be submitted at the time of the PSTP submittal. It is Ohio's position that if this level of information is not contained in the STP's it will be necessary to include a compliance schedule in each order requiring its submittal.
6. As indicated to DOE in previous communications Ohio does not ratify DOE's approach to establishing milestones. Enforceable milestones which do not support funding the projects and moving the projects forward are not acceptable to Ohio. We will be discussing this issue with each of our sites in upcoming meetings.
7. The disposal issue is not appropriately addressed in the DSTP's. The STP's must begin to project the narrowing of disposal options for residuals in order for states to carry-out equity discussions and for states to be in a position to approve the STP's.
8. DOE must provide a schedule for waste characterization in the STP's where there is a lack of sufficient waste characterization to determine the appropriate treatability grouping and where there is insufficient characterization to determine specific treatment levels for technologies chosen.

9. Section 6. Future Generation of Mixed Waste-Streams

This section represents that "the site treatment plan, or modification thereto, will not include any environmental restoration wastes for which treatment is addressed pursuant to any agreement, order or plan issued by Ohio or to which Ohio is a party." DOE must include a discussion in the STP's which identifies these waste streams, quantity, the order (authority) under which they're being addressed, schedules and treatment technology being utilized. Consideration must be given to this by DOE in their development of a facility-wide waste treatment scheme. It is also important that stakeholders be fully advised of all relevant issues.

10. Complete life cycle costs need to be reflected in each DSTP for treatment technologies chosen. It is not apparent in each DSTP that this has been done.
11. There was little evaluation or summary of "The Ohio Option" in the DSTP's and no apparent decision points as to why the "Ohio Option" was not chosen as a preferred option.