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DOE-FEMP DSTP COMMENTS (DRAFT SITE TREATMENT PLAN)

10/31/94

OEPA DOE-FN
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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich
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October 31, 1994

RE: DOE-FEMP
DSTP COMMENTS

Mr. John Sattler
U.S. DOE-FEMP
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Sattler:

Please find attached Ohio EPA's comments from the review of the U.S. DOE-FEMP Draft Site Treatment Plan (DSTP). The first attachment is a final copy of Ohio's general comments that are consistent for the DSTPs submitted by the five Ohio sites. The second attachment is the list of comments specific to the DOE-FEMP DSTP.

If you have any questions or comments, do not hesitate to call me at (513) 285-6079.

Sincerely,

Paul D. Pardi
Group Leader
Division of Hazardous Waste Management

PDP/br

Enclosures

cc: Mike Savage, DHWM/CO
Tom Winston, District Chief/SWDO

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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.

DOE-FEMP DSTP
OHIO EPA SITE SPECIFIC COMMENTS

1. Background Volume, Section 2.4.1, page 19 - The DSTP does not provide detailed technical information regarding the treatment processes. This section references project "work plans" to be developed which will address technical aspects of MW treatment. What is the schedule for development of these plans? Are they to be a part of the Final STP? See Ohio EPA General Comment #5.
2. Background Volume, Section 2.4 - This section avoids discussion of sampling and analysis as an integral part of the characterization process. The discussion centers around process knowledge as being sufficient for initial characterization. Mixed waste must be fully characterized before treatment can be undertaken. See Ohio EPA General Comment #8.
3. Background Volume, Section 2.4.1, page 18 - This page references Figure 1 on page 19. However, Figure 1 is on page 21. This type of misnumbering occurs throughout the Background Volume.
4. Background Volume, Section 3.1.3, page 30 - DOE must provide additional information clarifying the relationship of the incineration project with the wastewater treatment project. Current language lends to confusion as to how certain waste streams will actually be treated.
5. Background Volume, Section 3.1.5, page 40 - This section describes the Mobile Chemical Treatment Preferred Option. Under this mobile chemical treatment "umbrella", 11 separate treatment processes are described. Describe the rationale for including 11 different processes under one option and describe how DOE has ensured that all treatment options will be properly evaluated (considering on-site, off-site, and/or commercial capabilities for each of the 11 processes). See comment 14 below.
6. Background Volume, Section 3.1.6, Table 6 - Under the EPA codes for some of the waste streams, there is a notation (WW) or (NWW). However, this is not the case for all waste streams. Provide an explanation for this. Also describe what criteria you used to designate a (WW) versus a (NWW).
7. Background Volume, Section 3.3, pages 71-78 - Provide justification for the schedule provided to characterize these wastes. How are these wastes affected (or unaffected) by the schedules provided in the Stipulated Amended Consent Decree (SACD)? See Ohio EPA General Comment 8.
8. Background Volume, Section 6.0-6.2, pages 79-83 - In addressing future generation of mixed waste streams, DOE proposes to submit information/schedules for treatment as driven by the CERCLA process. 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. See Ohio EPA General Comment 9.

9. Background Volume, Section 6.0, page 81 - The information presented does not account for all HWMUs (and associated projected mixed waste quantities) in OU 3. Explain.

10. Background Volume, Section 6.0-6.2, pages 79-83 - In addressing future generation of mixed waste streams, DOE only discusses the generation of remediation wastes. This section should also discuss ongoing generation of wastes other than remediation wastes, and should discuss the plan and schedule for the treatment of this waste.

11. Background Volume, Section 8.4, pages 92-93 - This section briefly discusses disposal factors, and refers to Appendix C for disposal information. However, Appendix C does not include specific disposal information for treatment residuals. Section 8.4 and Appendix C should provide specific disposal plans for the residuals. See Ohio EPA General Comment 7.

12. Appendix A, page A-8 - This section states that FEMP did not always evaluate the Ohio option or the off-site option if a viable on-site option existed, consistent with the DOE-HQ framework. The Ohio option should be evaluated in all cases, and rationale for not selecting the Ohio option must be provided. See Ohio EPA General Comment 11.

13. Appendix A, Figures - These Figures chart the comparison of options for each of the preferred options. However, there is no corresponding narrative to describe the rating of each option against each of the described criteria. For example, there is no discussion provided as to why the Mound Glass Melter received a 3 rating for Environmental/Public Health while On-Site Mobile Stabilization received a 5 in this category. The plan must include additional detail describing the rationale for each rating so that the state can evaluate the adequacy of DOE's selection process. See Ohio EPA General Comment 4.

14. Appendix A, Section 2.4, page A-33 - As previously stated (comment 5), Mobile Chemical Treatment is actually a number of different processes. While Section 3.1.5 breaks it out into 11 different processes, this section describes 7 different treatment trains associated with the Mobile Chemical Treatment preferred option. From the description of the treatment trains, it appears that it might be appropriate to split this one preferred option into at least 4 - Deactivation, Neutralization, Fuel substitution, and Amalgamation. As stated in comment 4, provide additional discussion justifying DOE's approach to the Mobile Chemical Treatment preferred option. Again, this may be significant in ensuring that all available options have been evaluated properly and adequately for each waste stream.

15. Appendix A, Section 2.5, page A-43 - In the background volume, On-site Wastewater Treatment is identified as a Preferred Option. However, in Appendix A, the Wastewater Treatment option is not evaluated separately, but appears to be lumped in with the evaluation of the TSCA Incinerator option. The Wastewater Treatment option should be evaluated separately.
16. Appendix A, Section 2.6, page A-60 - The narrative states that no treatment is required prior to shipment to Envirocare. However, Treatment Train K is identified as being necessary to complete the project for some of the waste streams. Treatment Train K describes incineration and stabilization steps prior to disposal. Explain the discrepancy.
17. Appendix C/Treatment Trains - Disposal of treatment residues are generally addressed for each treatment train. However, specific disposal options are not identified. Do we assume that "Mixed Waste Disposal" indicates the waste will go to Envirocare, and "LLW Disposal" means the waste will go to NTS? See Ohio EPA Comment 7.
18. Appendix D, page D-24 - This section, dealing with public participation, states that the DSTP will be made available for public review and comment, and that comments received will be considered in the preparation of the Final STP. It should be stated that public comments will also be shared with Ohio EPA.
19. Plan Volume, Section 3.1.3, page 13 - The regulatory mechanism described for the wastewater treatment option (CERCLA Removal Action) is inconsistent with that indicated in the summary sheet given to Ohio EPA during the 9/8/94 meeting with FEMP. (The summary sheet indicates the regulatory mechanism to be an Ohio Consent Order.)
20. General comment - The plan does not account for the the potential disposal of residues in the Envirocare and TSCA Incinerator preferred options. In order to adequately address equity issues with Utah and Tennessee, it is important for Ohio to have a handle on the total quantity of waste that might be shipped to these out of state facilities throughout the course of activities described in the plan. This total should include existing waste, future generated waste, and to the extent possible, treatment residues. See Ohio EPA General Comment 3.
21. General comment - A review of the DOE-Ports DSTP reveals that they have identified FEMPs MAWS system as a preferred option for some of their waste streams accounting for approximately 83 cubic meters of waste. FEMPs DSTP does not reflect this activity. The plan must clearly reflect any plans for receipt of waste from off-site. See General Comment 1.