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REQUEST FOR APPROVAL OF POLICY FOR MANAGEMENT OF AQUEOUS INVESTIGATION DERIVED WASTE

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LETTER

Department of Energy
Fernald Environmental Management Project
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Mr. James A. Saric, Remedial Project Manager
U. S. Environmental Protection Agency
Region V-5HRE-8J
77 W. Jackson Blvd
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager
Southwest District Office
Ohio Environmental Protection Agency
401 East Fifth Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Schneider:

REQUEST FOR APPROVAL OF POLICY FOR MANAGEMENT OF AQUEOUS INVESTIGATION DERIVED WASTE

This letter requests your formal approval of the Fernald Environmental Management Project (FEMP) policy for management of aqueous Investigation Derived Waste (IDW). IDW to be managed under this policy includes purge water and development water from FEMP groundwater monitoring wells, as well as, wastewater generated by decontaminating sampling equipment. The inventory of backlog aqueous IDW currently in storage at the FEMP is also included. Unused sample fractions, extracts and other residues from laboratory analyses will be managed under a separate policy currently being developed; these materials are not addressed in this proposed policy.

The aqueous IDW policy previously presented for your review has been modified to take into account the treatment provided by the Advanced Wastewater Treatment (AWWT) facility, which began operation January 27, 1995. This modified proposal is based upon the fact that all IDW, regardless of its source, will be treated through the AWWT facility. The AWWT facility currently treats all FEMP stormwater and process wastewater, along with a portion of the South Plume groundwater. As illustrated in the attached schematic, the AWWT includes carbon filters upstream of the ion exchange beds. The carbon filters were included in the design to protect the ion exchange resin from possible damage caused by incidental Volatile Organic Compound (VOC) contamination. These carbon filters accomplish the same level of VOC removal provided by the Granular Activated Carbon (GAC) filters in the Plant 8 VOC system.

Recycled and Recyclable

Since all process wastewater and stormwater is now subjected to adequate VOC treatment, pretreatment based upon a threshold level of VOC contamination is no longer necessary, except for instances where VOC contamination is known to originate from listed waste. The Fire Training Facility and the Sewage Treatment Plant Sludge Drying Beds are potential sources of known listed hazardous constituents. Since these units are isolated from other potential sources of VOC contamination, VOCs encountered in perched water beneath these two units will be considered to potentially originate from listed waste. IDW from the vicinity of these two units which exhibits detectable levels of a "listed" VOC will be treated through the Plant 8 GAC system to remove the listed RCRA constituent to below the analytical detection limit before being sent to the AWWT via the General Sump.

All other aqueous IDW will be discharged to the wastewater treatment system at the location that most efficiently provides direct access to AWWT treatment. Purge water and well development water from wells in Operable Unit 2 (OU2) and Operable Unit 5 (OU5) will be collected in a truck-mounted tank, transported to the Stormwater Retention Basin (SWRB), and discharged directly to whichever of the two basins is being pumped to the AWWT at that time. Discharging purge water from these two areas to the SWRB avoids the need to transport the material through the production area and, as illustrated in the attached flow diagram, provides direct access to the AWWT. All other IDW streams will be discharged to the General Sump for subsequent treatment at the AWWT.

If you have any questions or comments, please contact Pete Yerace at (513)648-3161 or John Sattler at (513)648-3145.

Sincerely,

Johnny Reising

for Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Yerace

cc:

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