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**PSTP NOTICE OF DEFICIENCY (DOE-FEMP PROPOSED SITE
TREATMENT PLAN COMMENTS OF DEFICIENCY)**

06/26/95

OEPA DOE-OFO
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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
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George V. Voinovich
Governor

June 26, 1995

RE: U.S. DOE-FEMP
PSTP NOTICE OF DEFICIENCY

Mr. J. Phil Hamric
Manager, Ohio Field Office
Miamisburg Area Office
P.O. Box 3020
Miamisburg, Ohio 45343-3020

Dear Mr. Hamric:

The Ohio EPA has completed review of the DOE-FEMP Proposed Site Treatment Plan as submitted on March 29, 1995 and has found it to be deficient. We have attached comments that are the result of this review.

Please revise the plan to address these comments. It is not necessary for DOE-FEMP to submit the revised plan at this time. It may be more prudent to wait to address any comments received during the public comment period before you submit a revised plan. We will send you a list of any public comments that will require plan revision and we will ask that the plan be submitted within 30 days of receipt of those comments. At the time that the revised plan is submitted, please send two copies to Michael Savage, Ohio EPA, Division of Hazardous Waste Management, P.O. Box 1049, Columbus, Ohio 43216-1049. If you have any questions or comments, please call me at 513-285-6079, or Michael Savage at 614-644-2921.

Sincerely,

Paul D. Pardi
Group Leader, DHWM

PDP/rif

cc: Michael Savage, DHWM, CO
Tom Winston, Chief, SWDO
John Sattler, DOE-FEMP

**DOE-FEMP PROPOSED SITE TREATMENT PLAN
OHIO EPA DEFICIENCY COMMENTS**

1. Detailed technical information has not been submitted for some of the preferred options (Thorium Nitrate closure, Stabilization project, Mobile Chemical Treatment project). The Plan Volume does not provide for a schedule for submittal of this information. This schedule information is provided in Figures 3.1 of the Background Volume. This information should also appear in the Plan Volume.
2. Section 3.1.5 of the Background Volume indicates that the FEMP may receive waste from Battelle Columbus Laboratory for treatment under the Stabilization project. Will DOE-FEMP be responsible for short-term storage, long-term storage, and/or disposal of the treatment residue from Battelle's waste? This must be specified in the plan. Also, this waste is not identified in Appendix C (the description of the treatment trains).
3. Sections 2.1 and 3.0 of the Plan Volume contains language designed to qualify DOE-FEMP's responsibility to comply with the schedules provided therein based on funding availability. This language must be removed in its entirety if approval is to be granted by the Director. The order language can address this issue if appropriate.
4. Since DOE-FEMP does not have any transuranic (TRU) waste in storage and does not intend to generate any, references to TRU waste and the DOE position on how it will be handled should be deleted from the PSTP.
5. FEMP suggests that they are currently not planning on treatment residues being returned to FEMP for interim storage. FEMP should provide a discussion on alternatives to this position, if in fact residues must come back to FEMP. Additionally, prior to receiving residues back on-site, FEMP must submit a "residues storage plan" and obtain Ohio EPA approval.