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**LETTER DOCUMENTING COMMENTS ON THE SUBMITTAL OF THE  
MIXED WASTE CHEMICAL TREATMENT PROJECT WORKPLAN**

01/04/96

OEPA            DOE-FN  
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COMMENTS



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

January 4, 1996

RE: U.S. DOE-FEMP  
OH6890008976  
HAZARDOUS WASTE  
HAMILTON COUNTY  
TSD-LQG

Mr. Johnny Reising  
U.S. DOE-FEMP  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Reising:

This letter is in response to the Department of Energy's (DOE) submittal of the Mixed Waste Chemical Treatment Project Workplan. The document was received by Ohio EPA's Office of Federal Facility Oversight (OFFO) on November 24, 1995 and forwarded to the Division of Hazardous Waste Management (DHWM) on December 1, 1995 for review.

Based on their review, the DHWM offers the following comments regarding ARARs compliance:

1. Several of the proposed treatment technologies incorporate the use of tanks in the treatment of the mixed wastes. DOE-FEMP must comply with the tank standards addressed in the Ohio Administrative Code (OAC) sections 3745-66-92 thru 3745-66-991. Any project specific workplan that incorporates the use of a tank for the storage and/or treatment of hazardous waste must list applicable tank standards as ARARs and must describe how DOE will comply with these standards.
2. The workplan indicates that ignitable wastes will be treated in this project. DOE-FEMP must include OAC 3745-65-17, General Requirements for Ignitable, Reactive or Incompatible Wastes, as an applicable requirement.
3. DOE-FEMP must include OAC 3745-52-40 and -42 as an applicable requirement addressing recordkeeping with regards to retention of manifest documentation.
4. A possible error was noted in Table 6-1 on page 74. This error occurs in the block titled "Preparing and Transporting Hazardous Waste Off-Site". The OAC references in this

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block appear to be in error. DOE-FEMP must reevaluate the adequacy of the references and revise as appropriate.

The DHWM offers the following additional comment regarding plan content:

1. Section 3.2, page 12, "Mercury Treatment Treatability Study". The plan indicates that approximately 36 drums of mercury contaminated wastes are currently on-site. The plan states that this entire inventory will be consumed in the treatability study. The DHWM requests additional information on the treatability study and also believes that this should be addressed under ARARs (OAC 3745-51-04E).

Ohio EPA recognizes this document as a general discussion of the scope of the Chemical Treatment Project and approves of the direction DOE-FEMP has taken in addressing the treatment of mixed waste at Fernald. This document does not contain specific information which addresses how this project will be conducted in accordance with RCRA ARARs. It is assumed that the project specific plans will include this information. Ohio EPA anticipates receipt of the technology specific workplans and will reserve specific technical comments until review of those documents is complete. Approval of this document does not imply approval of the technology specific plans.

Should you have any questions concerning the above please contact Mr. Chris Budich of the DHWM at 513-285-6083.

Sincerely,



Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

- cc: Chris Budich, DHWM, SWDO  
Jim Saric, USEPA, Region V  
Ruth Vandegrift, ODH  
Terry Hagen, FERMO  
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