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R-020-207.15

**LIQUID MIXED WASTE, WASTE WATER TREATMENT PLAN -
CONDITIONAL APPROVAL**

01/12/96

OEPA DOE-FN
2
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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FERNALD _____ 7445

DOE J-0910

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FILE: _____

George V. Voinovich
Governor

LIBRARY: _____

January 12, 1996

RE: DOE FEMP
MSL #531-0297
LIQUID MIXED WASTE; WASTE
WATER TREATMENT PLAN -
CONDITIONAL APPROVAL

Mr. Johnny Reising
U.S. Department of Energy
Fernald Environmental Management Project
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Reising:

Reference: REMOVAL ACTION No. 9, "WORK PLAN FOR FERNALD ENVIRONMENTAL MANAGEMENT PROJECT LIQUID MIXED WASTES", WASTE WATER TREATMENT TECHNICAL SPECIFIC WORK PLAN.

Ohio EPA has reviewed the Waste Water Treatment Technical Specific Work Plan submitted to this office December 7, 1995, as an addendum to RA No. 9/Liquid Mixed Wastes.

This letter will transmit conditional approval for the referenced project. Please provide a response to the attached agency comments. The response may be submitted as an attachment to the work plan.

Please contact Phil Harris, Division of Hazardous Waste Management, at (513) 285-6090 if you have any questions regarding the conditional approval.

Sincerely,

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

Attachment

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PARTIAL
ACTION RESPONSE
TO P-0289
(9347)

Mr. Johnny Reissing
January 12, 1996
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ATTACHMENT

DOE-FEMP: RA No.9, "WORK PLAN FOR FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT LIQUID MIXED WASTES," WASTEWATER TREATMENT
TECHNICAL SPECIFIC WORK PLAN. (Received 12/8/95)

Regarding the referenced work plan:

- 1. The proposal calls for an assumption that LDR treatment standards will be met following treatment of wastewaters. There is no mechanism for verification of this assumption, i.e., sampling following treatment and prior to discharge. While OEPA DHWM agrees that treatment (including permissible dilution) should ensure no violation of LDR treatment standards, the inherent assumption is a concern for OEPA. One possible solution to this issue is development of a "worst case calculation" which would show the relationship between constituent concentration and effect of dilution in the treatment system.

OEPA DHWM requests that DOE-FEMP Environmental Management prepare such a calculation table. It is suggested that the "worst case" should assume highest concentration levels in influent wastewaters, and either no treatment, or minimal removal efficiency for a particular treatment activity. The calculations should include several representative examples based upon treatment activity.

- 2. Section 4.2 (pg. S-20) in the work plan states that treatment will be conducted in conjunction with an "administrative review" designed to ensure that treatment activity does not result in a violation of either the FEMP NPDES permit, or RCRA LDRs. A "detailed discussion" of the administrative review process is promised in Section 7.0

Section 7.0 of the work plan would benefit by elaborating on the review activity to be conducted (by, for example, Environmental Compliance) to achieve the stated objectives.

END COMMENTS