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R-020-208.7

**TECHNOLOGY SPECIFIC WORK PLAN FOR WASTE SEGREGATION**

05/13/96

DOE-0868-96  
DOE-FN        EPAS  
8  
RESPONSES



**Department of Energy**

**Ohio Field Office  
Fernald Area Office**

P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155



MAY 13 1996

DOE-0868-96

**Mr. James A. Saric, Remedial Project Director  
U.S. Environmental Protection Agency  
Region V - SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

**Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5th Street  
Dayton, Ohio 45402-2911**

Dear Mr. Saric and Mr. Schneider:

**TECHNOLOGY SPECIFIC WORK PLAN FOR WASTE SEGREGATION**

This letter is to provide responses to the U.S. Environmental Protection Agency (U.S. EPA) the April 5, 1996, correspondence, which granted conditional approval of the Technology Specific Work Plan for Waste Segregation. The condition of approval was the satisfactory resolution of two comments contained in the U.S. EPA correspondence. Comment, response, and action are provided within Enclosure A.

If you should have any questions regarding this matter, please contact John Sattler at (513) 648-3145, or Robert Danner at (513) 648-3167.

Sincerely,

**Johnny W. Reising  
Fernald Remedial Action  
Project Manager**

FN:Danner

Enclosures: As Stated

**cc w/encs:**

**R. L. Nace, EM-423/GTN**  
**L. Parsons, DOE-FN**  
**J. Sattler, DOE-FN**  
**G. Jablonowski, USEPA-V, 5HRE-8J**  
**Manager, TPSS/DERR, OEPA-Columbus**  
**T. Schneider, OEPA-Dayton (3 copies of encs.)**  
**F. Bell, ATSDR**  
**D. S. Ward, GeoTrans**  
**R. Vandegrift, ODOH**  
**S. McLellan, PRC**  
**V. Daub, FERMCO/16-2**  
**T. Hagen, FERMCO/65-2**  
**J. Harmon, FERMCO/90**  
**M. West, FERMCO/65-2**  
**AR Coordinator/78**

**cc w/o enc:**

**C. Little, FERMCO/2**  
**M. Yates, FERMCO/9**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

J-1583  
APR 5 11 07 AM '86

REPLY TO THE ATTENTION OF:

APR 24 1986

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Removal Action 9:  
Waste Segregation Work Plan

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Removal Action 9: technology specific work plan for waste segregation.

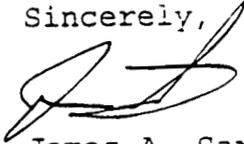
The work plan describes the objectives and scope of work necessary to segregate mixed waste materials currently stored at the site into eleven waste categories, each of which will include a waste stream to be treated by a specific chemical process.

Although the work plan conforms with U.S. EPA guidance some minor clarification is required. Therefore, U.S. EPA approves the work plan pending submittal of responses to comments and changed pages incorporating adequate responses to U.S. EPA's attached comments. U.S. DOE must submit responses to comments and changed pages within thirty (30) days receipt of this letter.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Jack Baublitz, U.S. DOE-HDQ  
John Bradburne, FERMCO  
Charles Little, FERMCO  
Terry Hagen, FERMCO  
Michael Yates, FERMCO

USEPA TECHNICAL REVIEW COMMENTS  
 "FERNALD ENVIRONMENTAL MANAGEMENT PROJECT  
 MIXED WASTE CHEMICAL TREATMENT PROJECT  
 WASTE SEGREGATION TECHNOLOGY SPECIFIC WORK PLAN"  
 REVISION 0

General Comment

Commenting Organization: U.S. EPA  
 Section #: NA Page #: NA  
 Original General Comment #: 1

Commentor: Saric  
 Line #: NA

**Comment:** The work plan does not include sufficient information about the removal action. For example, no information is provided concerning (1) the individual(s) responsible for project management activities, (2) lines of authority and communication, (3) emergency contacts, and (4) procedures for assessing and responding to a spill. In addition, the project timetable needs to be updated. The work plan should contain sufficient information to be considered a stand alone document or make reference to the document(s) that contains sufficient information.

**Response:** The General CERCLA Work Plan for the Mixed Waste Chemical Treatment project was approved by USEPA and OEPA in January 1996 and addresses specific technology that will be used treat legacy mixed waste stored at the Fernald site.

The Waste Segregation Technology Specific Work Plan (TSWP) was developed by FERMC0 and DOE-FN to satisfy General CERCLA Work Plan requirement that a TSWP be prepared for each specific treatment process covered in the General CERCLA Work Plan. Additionally, TSWP development was driven by Fernald site commitments in the Site Treatment Plan (STP). Combining applicable aspects of the General CERCLA Work Plan and the Waste Segregation TSWP results in management of the Waste Segregation Project under the auspices of the approved Removal Action No. 9, "Removal of Waste Inventories".

With respect to the specific comments noted above the following is provided:

- (1) Responsible Project management and organization is described in TSWP Section 6.1 and Figure 6-1. Figure 6-1 has been revised to identify division responsibilities. Individuals are not named to avoid constraints pertaining to work plan flexibility.
- (2) Authority and communication lines are described in TSWP Section 6.1 and Figure 6-1.
- (3) Information on emergency contacts is provided in TSWP Section 5.1 and Section 5.4.
- (4) Procedures for assessing and responding to a spill are described in TSWP Section 3.5.3.

The project schedule provided in TSWP Figure 3-6, has been revised to reflect the current status of the project.

- (4) Procedures for assessing and responding to a spill are described in TSWP Section 3.5.3.

The project schedule provided in TSWP Figure 3-6, has been revised to reflect the current status of the project.

Action: Revised Figures 3-6 and 6-1 are attached.

### Specific Comment

Commenting Organization: U.S. EPA

Commentor: Saric

Section #: 6.1 Page #: 35

Line #: NA

Original General Comment #: 1

Comment: This section does not include a project-specific discussion of (1) the individuals responsible for implementing the removal action, (2) lines of authority or communication, (3) an implementation schedule for, or (4) anticipated deliverables under this removal action. The text should be modified to include that information, and a schedule and a project management flow chart or description should be added.

Response: With respect to the specific comments included above the following is provided:

- (1) Information on the project management organization is provided in TSWP Section 6.1 and Figure 6-1. Figure 6-1 has been revised to identify division responsibilities. Individuals are not named to avoid constraints pertaining to work plan flexibility.
- (2) Project authority and communication lines are described in TSWP Section 6.1 and Figure 6-1.
- (3) An implementation schedule, provided in TSWP Figure 3-6, has been updated to reflect the current status of the project.
- (4) The ACA requires DOE-FN to submit an annual compendium of existing procedures and documentation for the site's Low-Level Radioactive Waste (LLRW) Management Program. Additionally, in Addendum No.1 to the Removal Action No. 9 Work Plan, DOE-FN committed to submitting certain project work plans; including the General CERCLA Work Plan and, by association, the Waste Segregation TSWP. The approved TSWP for Waste Segregation is considered to be incorporated into the Removal Action No. 9 Work Plan and will not be resubmitted as a part of the annual compendium update in June.

The project schedule provided in Figure 3-6 has been revised to reflect its current status on the project.

Action: Revised Figures 3-6 and 6-1 are attached.

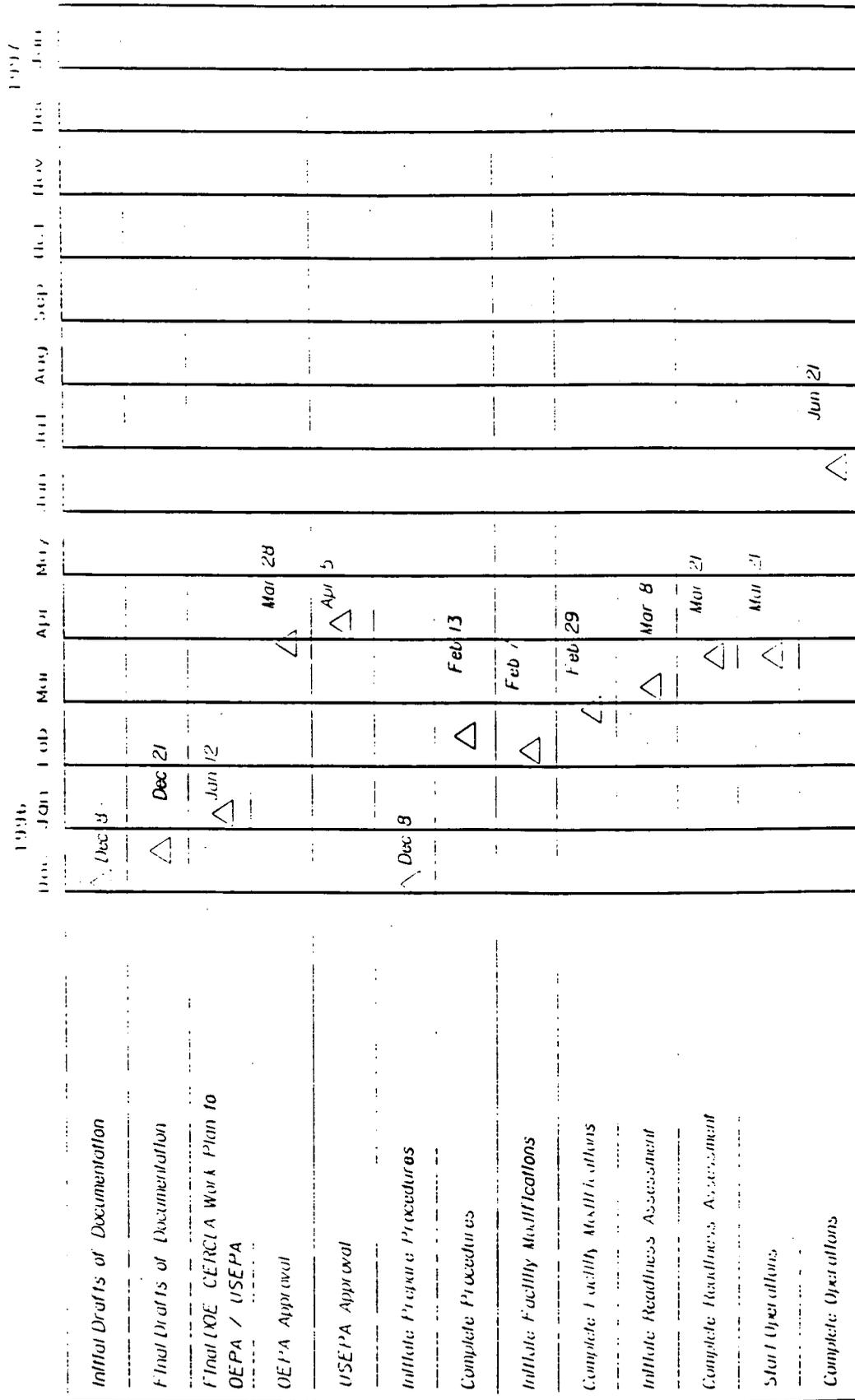


Figure 3-6 Waste Segregation Project Schedule

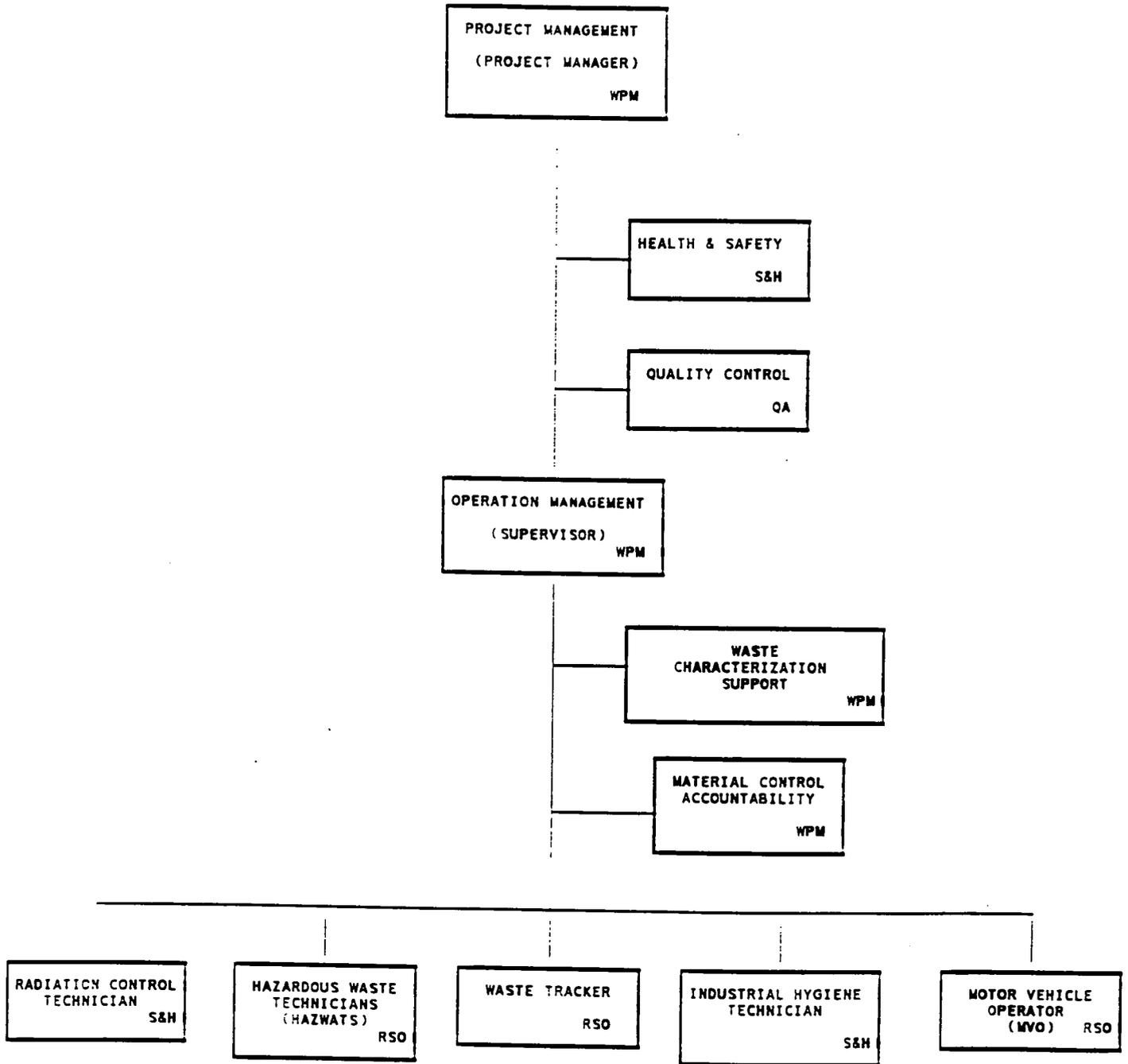


Figure 6-1  
Organizational Structure  
Waste Segregation Process

FERMCO DIVISION:  
 WPM --WASTE PROGRAMS MANAGEMENT  
 SH --SAFETY AND HEALTH  
 RSO --REMEDIAL SUPPORT OPERATIO  
 QA --QUALITY ASSURANCE