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**PROPOSAL TO TREAT LIQUID WASTES UNDER EXISTING REMOVAL
ACTIONS**

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LETTER



Department of Energy

**Ohio Field Office
Fernald Area Office**

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AUG 06 1996

DOE-1049-96

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:

PROPOSAL TO TREAT LIQUID WASTES UNDER EXISTING REMOVAL ACTIONS

Your review and concurrence is requested to process certain liquids found at the Fernald Environmental Management Project (FEMP) site during safe shutdown and Decontamination and Demolition (D&D) activities, as part of Removal Action Number 9 (Removal of Waste Inventories) and Number 20 (Stabilization of UNH Inventories). The use of removal actions is suggested since some liquids, primarily nitric acid and thorium nitrate solutions, discovered in the former production area should be similar in nature to waste streams already processed under these removal actions. The FEMP expects to find small volumes of liquid in the former production area. Existing procedures established by the implementation of the removal action work plans, or job specific work plans, will provide a safe and familiar process to handle some types of liquids.

The FEMP wishes to streamline the approval process without amending work plans whenever small volumes of liquids are found. The liquids would typically be collected from the former process lines (along with rinseate from flushing) and processed using the same methodologies as described in the plans. The normal inspection procedures and requirements established in the plans would still be followed to ensure any liquids collected for processing are maintained in a safe and compliant manner. This strategy is consistent with the FEMP Site Treatment Plan (STP) in that all future generated mixed waste which is similar in composition to legacy mixed waste will be treated through the systems identified in the STP. Decisions on treatment of new wastes types generated by remedial activities will be made through the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process and will be reflected in future updates to the STP.

The volumes of liquids processed would be accounted for in either the Resource Conservation and Recovery Act (RCRA) Annual Report (if hazardous) or Site Treatment Plan Annual Report (if mixed waste) and/or the removal action closeout report(s). The review process discussed in the following paragraph would be utilized to determine the feasibility of processing the liquids under an existing removal action work plan.

The FEMP proposes to characterize the liquids (or use existing characterization data) in accordance with the Part B Permit Application, Section C. In addition, site procedures (e.g., EP-005) will be utilized to ensure that other regulatory requirements (i.e., Clean Water Act) are met. Finally, an estimate of the volume of liquid will be made (including rinseate volume if applicable) to determine if existing removal action work plans for either Number 9 and Number 20 are applicable. Verbal notification to the U.S. Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) will be made when the FEMP is ready to begin processing the liquids in Tanks F1-25 or F1-26. A 5000 gallon volume is the minimum amount which can be processed on a batch basis. If the FEMP decides to process the liquid prior to reaching the 5000 gallon volume, process water will be used to make up the necessary volume.

Discussions with OEPA representatives on the subject of liquid material were held over the last several months. They indicated that OEPA would support a streamlining of the approval process to treat liquids if the concept presented by the FEMP is sound.

If you have any questions or require additional information, please contact Robert Danner at (513)-648-3167.

Sincerely,



Johnny W. Reising
Project Manager
Fernald Remedial Action

FN:Danner

cc:

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