

7903

R-020-207.35

TSD-LQG COMMENTS - NPDS TSWP (MIXED WASTE CHEMICAL TREATMENT PROJECT, PRECIPITATION, DEACTIVATION AND STABILIZATION TECHNOLOGY SPECIFIC WORK PLAN) -

08/12/96

OEPA DOE-FN
3
COMMENTS

State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

J-3091
NOV 23 3 12 AM '96
6448.18

George V. Voinovich
Governor

August 12, 1996

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

Mr. Johnny Reising
U.S. DOE-FEMP
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Craig:

This letter is in response to the Fernald Environmental Management Project (FEMP) submittal of the Mixed Waste Chemical Treatment Project Neutralization, Precipitation, Deactivation, and Stabilization (NPDS) Technology Specific Work Plan. The document was received by Ohio EPA's Office of Federal Facility Oversight (OFFO) on July 1, 1996 and forwarded to the Division of Hazardous Waste Management (DHWM) on July 2, 1996 for review. A revision to the work plan was submitted to the DHWM on August 7, 1996.

Based on their review, the DHWM offers the following comments:

1. There are varying descriptions throughout the workplan regarding floor covering and secondary containment. FEMP must provide adequate secondary containment for all areas where mixed waste will be stored or treated. Although there is some degree of existing contamination of the floor in Plant 6, FEMP must provide adequate floor covering in all areas where splashing is likely to occur to prevent buildup of transferrable contamination.
2. Section 3.1 of the work plan indicates that a treatability study was conducted on three of the four waste streams by Nuclear Fuel Services, Inc. and the results were documented in a final report entitled *Treatability Study for the FERMC Chemical Treatment Project, NFS-SP-WST-006, Rev. 0, April 23, 1996*. OEPA DHWM request that FEMP provide a copy of this report.
3. Section 3.3.1, page 12 of the work plan states that corrosive wastes will be bulked in a portable cone-bottom container, followed by elementary neutralization. Also, section

F:\OU3\NPDS\TWP.WPD

(danner(r)
partial
action
response
to doe-1058-96
(9838)

Mr. Johnny Reising
August 12, 1996
Page 2

- 3.5.1 describes the use of a contaminated water storage tank. OEPA DHWM feels that these tanks meet the applicability requirements described in OAC 3745-66-90 for tank systems and that FEMP must include OAC 3745-66-90 through OAC 3745-66-991 as Applicable or Relevant and Appropriate Requirements (ARARS).
4. Section 3.3.4 describes the Deactivation\Stabilization Treatment Technology. On page 15 it is stated that in addition to the reduction of oxidizers, leachable RCRA metals will require precipitation to meet the LDR treatment standards under the Universal Treatment Standards. Figure 3-2 on page 13 should be revised to indicate this additional treatment for the oxidizer waste category.
 5. Section 3.5.1, page 18 describes Process Unit A. In the description it is stated that free liquids would be pumped from the waste drums to the contaminated water storage tank. This contaminated water will be used later in several of the treatment processes. OEPA DHWM request information on what steps will be taken to ensure that incompatible waste are not introduced into a treatment process by reusing the contaminated water.
 6. Section 3.5.4, page 27 describes Process Unit D and states that stabilization\deactivation treatment may proceed immediately after chemical precipitation treatment has been completed, or it may take place at a later time. FEMP must provide additional information on how these containers will be managed in the event that the stabilization\deactivation treatment does not proceed immediately following the chemical precipitation process.
 7. Section 3.5.4, page 27 states that Process Unit D will also be used for the deactivation treatment of reactive and ignitable metals in addition to the treatment of oxidizers. FEMP must provide information on what precautions will be taken to control the hazards associated with incompatible wastes.
 8. Section 3.6.4, page 33 describes facility and container inspections and indicates a weekly inspection schedule. However, OAC 3745-65-15(B)(4) requires that areas subject to spills, such as loading and unloading areas, shall be inspected daily when in use. FEMP must revise the work plan as appropriate.
 9. Table 4-1(ARARS), page 57 under the RCRA Closure Performance Standards references Section 4.8 of the work plan. It does not appear that a Section 4.8 was included in the work plan submitted to OEPA. FEMP must correct this discrepancy and provide the information described in the ARARS table regarding closure performance standards.

Mr. Johnny Reising
August 12, 1996
Page 3

10. The revision to the work plan proposes that the treatment of thorium wastes be conducted in plant 5. OEPA DHWM concurs with the proposed revision. FEMP must provide detailed information addressing this treatment in its response to these comments.

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, FERMCO
Manager TPSS, DERR
Sharon McClellan, PRC
Dave Ward, GeoTrans