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R-023-207.25

**COMMENTS ON REMOVAL ACTION NO. 20: URANYL NITRATE
NEUTRALIZATION (UNH) PROJECT FINAL REPORT, SUBMITTED
NOVEMBER 22, 1996**

01/24/97

OEPA DOE-FEMP
3
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 _____

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Jan 27 10 34 AM '97

George V. Voinovich
Governor

6448.23

January 24, 1997

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

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

Reference: Removal Action No. 20: Uranyl Nitrate Neutralization (UNH) Project Final Report, submitted November 22, 1996.

Dear Mr. Reising:

Ohio EPA's response to the above referenced report is provided in two (2) parts, as follows:

1. This letter acknowledges that the U.S. Department of Energy Fernald Environmental Management Project completed the UNH Neutralization Project in accordance with Ohio EPA Director's Findings and Orders issued December 27, 1994. Project activity was conducted in accordance with applicable regulations governing management of hazardous waste.
2. Attachment A of this letter provides Ohio EPA comments on the same removal action. Ohio EPA believes the incorporation of DOE-FEMP's response to the attached comments will result in more accurate, and hopefully useful CERCLA documentation of the removal action. Please revise the report accordingly. Questions concerning Attachment A should be directed to Thomas A. Schneider, Fernald Project Manager, Office of Federal Facilities Oversight, (937) 285-6466.

Should you have any questions in regard to this correspondence, please contact either myself at (937) 285-6090, or Chris Budich at (937) 285-6083.

Sincerely,

Phillip C. Harris
Division of Hazardous Waste Management

(danner(r)
partial
action response
to doe-0163-97
(10260)

000001

Mr. Johnny Reising, U.S. DOE-FEMP
January 24, 1997
page 2

cc: Jim Saric U.S. EPA
Tom Schneider, OEPA OFFO
Paul Pardi, OEPA DHWM
Manager TPSS, OEPA DERR/CO
Ruth Vandegrift, ODH
Terry Hagen, FERMCO
Sharon McClellan, PRC
Dave Ward, GeoTrans

Mr. Johnny Reising, U.S. DOE-FEMP
January 24, 1997

ATTACHMENT A

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: Code: M
 Original Comment #:
 Comment: The document appears to skim over the number of difficulties and problems encountered during the implementation of this removal action. More importantly it does not document the lessons learned during the project. For this document to be truly useful and aid future activities, it should include an accounting of difficulties, solutions and knowledge gained. Such information is important to not only activities at Fernald but for other sites that may want information on conducting similar actions. Documenting such lessons will prevent the loss of institutional knowledge through personnel changes.
 Response:
 Action:

- 2) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Pg #: Line #: Code: C
 Original Comment #:
 Comment: Final reports are supposed to include a history of the project and any changes in approved work plans. The document should be revised to include a discussion of the origination of the Removal Action as an Emergency Removal Action and why it was changed. In addition, changes to approved work plans should be discussed.
 Response:
 Action:

- 3) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 1.3 Pg #: 1-5 Line #: Code: C
 Original Comment #:
 Comment: The document should include a brief discussion of activities occurring between 4/93 and 12/94. Currently the document suggests nothing was done until Ohio EPA issue the DF&O.
 Response:
 Action:

- 4) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.0 Pg #: 3-1 Line #: 2nd paragraph Code: C
 Original Comment #:
 Comment: The paragraph should be revised to use similar units for waste generated and waste shipped to NTS. In addition, since the paragraph needs revision an update of the amount shipped to NTS is appropriate.

-End Comments-