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COMMENTS OU4 VITRIFICATION PILOT PLANT PHASE I INTERIM TREATABILITY STUDY

11/26/96

OEPA DOE-FN
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COMMENTS

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OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

George V. Voinovich
Governor

November 26, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS - OU-4
VITRIFICATION PILOT PLANT
PHASE I INTERIM
TREATABILITY STUDY

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has received DOE's Operable Unit 4 Vitrification Pilot Plant Phase I Interim Treatability Study dated October 14, 1996. Attached are Ohio EPA comments.

If you have any questions, please contact Kelly Kaletsky (937-285-6454) or me.

Sincerely,

Kelly Kaletsky for

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

cc: Jim Saric, USEPA
Terry Hagen, FERMCO
Ruth Vandergrift, ODH
Sharon McLellan, PRC
Manager, TPSS/DERR,CO
Dave Ward, GeoTrans

Categorical (A) partial action Response to doc-0073-97 (10136)

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OHIO EPA COMMENTS - OU-4 VITPP PHASE I INTERIM TREATABILITY STUDY REPORT - CAMPAIGN 1

1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.1 Pg #: 1-5 Line #: Code: C
Original Comment #:
Comment: The text describes problems associated with the gem making machine. Please provide information regarding steps being taken to alleviate the problem(s).
Response:
Action:

2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2 Pg #: 1-9 Line #: Code: C
Original Comment #:
Comment: Studies performed at the Catholic University of America's Vitreaous State Lab estimate the melter could produce from 3 to 5 MT/d of glass. Does DOE feel this is still a realistic expectation? Will a definite melter output be verified during upcoming campaigns?
Response:
Action:

3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3.1 Pg #: 3-1 Line #: Code: C
Original Comment #:
Comment: How are clogging/transport problems in the feed preparation and slurry systems being addressed?
Response:
Action:

4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.5.1 Pg #: 5-4 Line #: Code: C
Original Comment #:
Comment: Please reword this paragraph. It is difficult to understand, particularly the fourth sentence.
Response:
Action:

5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.16.1 Pg #: 5-27 Line #: Code: C
Original Comment #:
Comment: Provide additional information regarding the introduction of Desiccant Tower condensate into the recycle water loop. Specifically, provide information on how this material was introduced into the system and what steps are being taken to keep this from happening again.
Response:
Action:

6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.16.1 Pg #: 5-32 Line #: Code: C
Original Comment #:
Comment: Ohio EPA is very concerned about the frequency of the activation of the emergency off-gas system. The usage of the system seems to be occurring on a regular basis, thus negating the term "emergency." In addition, Table 7-3 lists the origin of several usages as "unknown." This, added to the fact that on several occasions, puffs of smoke have been observed upon activation signify that major problems still remain. Provide information on what steps are being taken to make certain that these problems will be resolved prior to the beginning of Phase II.
Response:
Action:

7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.1 Pg #: 6-1 Line #: Code: C
Original Comment #:
Comment: Will there be the opportunity to visually inspect the interior of the melter before the possible purchase of an additional melter? This inspection may provide information on the corrosion and other wearing of the interior of the melter.
Response:
Action:

8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.3 Pg #: 7-3 Line #: Code: C
Original Comment #:
Comment: Will the isokinetic monitoring system be tested before the startup of Phase II? The operation of the system is crucial to both worker and public safety. Perhaps the exhaust in the off-gas system could be spiked with a small amount of material that would be picked up by the sampling equipment.
Response:
Action:

9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.3 Pg #: 7-3 Line #: Code: C
Original Comment #:
Comment: Since the HEPA filter failed TCLP, DOE should implement a plan to isokinetically sample metals in the off-gas system during Phase II and full-scale operations. In addition, since water in the bottom of the filter housing also failed TCLP, DOE should develop a waste management plan as the possibility exists for the generation of mixed waste after Phase II operations begin.
Response:
Action:

10) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 7.7 Pg #: 7-9 Line #: Code: C
Original Comment #:
Comment: Please provide information regarding how the listed problems and concerns are being rectified.
Response:
Action: