



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

February 4, 1997

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

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

Dear Mr. Reising:

This letter is in response to the Fernald Environmental Management Project (FEMP) submittal of the Mixed Waste Chemical Treatment Project Organic Extraction Project Technology Specific Work Plan. The document was received by Ohio EPA's Division of Hazardous Waste Management (DHWM) on January 15, 1997.

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

1. On page 5 of the workplan it is stated that following vapor and/or solvent extraction Perma-Fix will review the waste characterization data for the original waste when making the determination of whether RCRA metals are present in concentrations above the LDR treatment standard. This would then be the basis for whether or not the waste would be subjected to precipitation/stabilization. Ohio EPA DHWM's concern is the potential for previously bound metals to be released during solvent extraction. If this were to happen, then the original waste characterization would not be acceptable for making this determination. Also, the potential release of any bound metals in the waste matrix will effect metals concentrations in the organic waste stream generated by the solvent extraction process. FEMP must provide additional information regarding the potential for the release of bound metals during the solvent extraction process. This information must address any revisions to waste characterization or handling that may be required.
2. Page 16 states that the drum lift at the screen hopper is capable of lifting either 55-gallon or 85-gallon drums. It also discusses procedures to address any 110-gallon overpack drums. On page 2, section 1.1 the plan states that some smaller (30-gallon) and some larger (4'x4'x7' boxes) containers are included in the waste inventory planned for the

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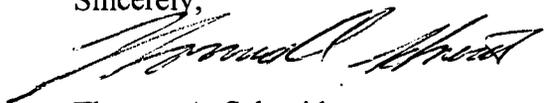
project. Ohio EPA DHWM requests additional information on how these containers will be addressed during waste preparation.

3. In several sections of the plan, it is stated that liquid waste (solvent or solvent\water mixtures) will be collected and evaluated for disposition through the AWWT or through the FEMP Liquid Mixed Waste Bulking Project. Ohio EPA DHWM requests information regarding the decision making process for the final disposition of this waste. FEMP may provide a list of the criteria used to make this decision or reference any previously submitted document where this information may be found.
4. Page 25, section 3.1.2.3.3, Solvent Extraction states " When the solvent end point concentration has been achieved, the waste material will be rinsed with clean utility water to remove the residual solvent." Page 26, section 3.1.2.3.5, Sampling and Analysis for PCBs and RCRA Organics states " The second type of sampling and analysis activity will be compliance sampling to prove that the treatment standards applicable under TSCA and RCRA LDR have been met, before any water rinse or RCRA metals stabilization processing takes place."It appears that the first sampling procedure concerns the extraction solvent and the second procedure involves sampling of the waste matrix. However, it is unclear as to when the water rinse will occur. FEMP must provide clarification as to when the waste matrix will be water rinsed.
5. This project will be conducted in two main locations, Building 80 and Plant 6. Ohio EPA requests information on the methods used to transport the extraction vessels between locations and any safety or spill control procedures that will be implemented.
6. Page 88, Section 8, ALARA Considerations, Daily Housekeeping states"recovered contaminated water will be stored in the contaminated water storage tank and reused in the treatment process." However, page 33, section 3.1.2.4.4, Contaminated Water Storage states "This water will be contaminated with EPA-listed waste codes, and therefore will not be reused in the stabilization process." The latter reference pertains to the organic sludge tank in Plant 6 but it is unclear as to which contaminated water storage tank is being addressed in the first reference. These references appear to conflict with each other and FEMP must provide clarification as to whether contaminated waste water is intended for reuse in the process.

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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
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