



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich  
Governor

August 12, 1998

RE: DOE FEMP  
APPROVE: INTERIM  
MANAGEMENT OF DIGESTER  
SLUDGE

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 reviewed DOE's August 10, 1998 submittal, "Proposal for Interim Manage of Certain Materials." Ohio EPA concurs with DOE's proposal for interim management of the digester sludge within the sludge drying bed. Ohio EPA also agrees that as long as a physical barrier is maintained between the previously existing sludge drying bed contents and the to be added digester sludge, the digester sludge will not acquire the listed "tag".

During Ohio EPA's August 11, 1998 inspection of the facility, it was noted that material from the east sludge drying bed had been placed into the west bed thus extending the above WAC/listed waste area. At the same inspection, it was agreed that a berm over which the geotextile would be laid would be used to add capacity to the drying beds. Should this additional berm not provide sufficient capacity for the digester sludge, DOE must propose an alternative management strategy for the remaining sludge. All reasonable measures must be taken to ensure the digester sludge will not migrate from the drying beds and the integrity of the Hazardous Waste Management Unit will be maintained.

Ohio EPA understands DOE will be analyzing representative samples of the digester sludge prior to final disposal. DOE shall evaluate the analytical result to determine whether additional contaminants of concern could have been introduced into the sludge drying beds impacting "closure" of the unit. Any impact on the sludge drying beds shall be reflected in the appropriate CERCLA documents associated with the integrated closure of this unit.

Considering the nature of this material and the proposed storage configuration, Ohio EPA has significant concerns regarding the phrase "interim management." The following are criteria for Ohio EPA approval of the proposed sludge management strategy: 1) the sludge drying beds will be the first priority for excavation during the STP excavation activities; 2) the digester sludge

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Mr. Johnny Reising  
August 12, 1998  
Page 2

will be removed from the drying beds and properly managed before June 1, 1999 3) Ohio EPA will be notified and provided an opportunity to inspect the drying beds both upon completion of sludge transfer prior to tarping and following tarping of the beds.

If you have any questions, please contact me.

Sincerely,



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

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Francie Barker, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO  
Paul Pardi, DHWM