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State of Ohio Environmental Protection Agency  
Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

January 11, 2005

Mr. William J. Taylor  
US Department of Energy  
Ohio Field Office  
Fernald Closure Project  
175 Tri-County Parkway  
Springdale, Ohio 45246

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**Re: Ohio Environmental Protection Agency Comments on the Uranium Assay Adjustment Project Work Plan Dated November 2004**

Dear Mr. Taylor:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the Department of Energy's transmittal of "Uranium Assay Adjustment Project Work Plan, (40600-PL-0001) Rev 01," dated November 2004. Ohio EPA's comments are enclosed.

If you have any questions, I can be reached at 937-285-6594.

Sincerely,

Thomas E. Koch  
Division of Hazardous Waste Management

cc: Thomas Shneider, OEPA/SWDO/OFFO  
Jim Saric, U.S. EPA  
Mark Shupe, GeoTrans, Inc.  
Michelle Cullerton, Tetra Tech EM Inc.  
Ruth Vandergrift, ODH

File: OEPA/SWDO/DHWM

TEK/rf



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OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE  
URANIUM ASSAY ADJUSTMENT PROJECT WORK PLAN DATED NOVEMBER 2004

General Comments

1. Commenting Organization: Ohio EPA                      Commentor: DHWM  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** Describe how and when the Process and Handling Facility will be dismantled, characterized, and disposed? Will the concrete be deconned? Describe decon efforts. Describe sampling requirements for the structure, and rinsate collection of the concrete in the Work Plan.
  
2. Commenting Organization: Ohio EPA                      Commentor: DHWM  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** How will PPE and if generated spill material be collected, characterized, and disposed? How will HEPA filters be collected, characterized, and disposed?
  
3. Commenting Organization: Ohio EPA                      Commentor: DHWM  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** Where will blended wastes and secondary wastes be stored after generation and before shipping?
  
4. Commenting Organization: Ohio EPA                      Commentor: DHWM  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** What steps are in place to ensure no cross contamination occurs between separate waste streams to ensure that the wastes won't require recharacterization?
  
5. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** The plan fails to document any mitigative measures to keep air emissions ALARA. Provide a plan describing how air handling will be accomplished.
  
6. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** Provide a NESHAPs (Part 61) evaluation to estimate air emissions and dose for this project. This evaluation needs to be performed to see if NESHAPs applies.
  
7. Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: na                      Pg. #: na      Line: na      Code: C  
**Comment:** The plan generally provides no details on what equipment/methods will be used to blend the wastes. Provide this information.

8. Commenting Organization: Ohio EPA Commentor: DHWM  
Section #: na Pg. #: na Line: na Code: C

**Comment:** For Group 1, how and when will it be decided which method (shredding, granulation, solvent, or hot water) to use on each waste? Identify the solvent to be used for Group 1 for each waste. Can hot water be used solely? How will the solvent affect the characterization of the blended waste? Provide a detailed description of the process for adding solvent including how and when this will be done and where. How was compatibility determined for the solvent?

9. Commenting Organization: Ohio EPA Commentor: DHWM  
Section #: na Pg. #: na Line: na Code: C

**Comment:** Identify the material to be used as blend material for each waste? How was compatibility determined for the blend material?

#### Comments

1. Commenting Organization: Ohio EPA Commentor: DHWM  
Section #: 5.2.1. Pg. #: na Line: na Code: C

**Comment:** Identify which Group each of the waste streams fall into and indicate what solvent will be used.

2. Commenting Organization: Ohio EPA Commentor: DHWM  
Section #: 5.3.1 Pg. #: na Line: na Code: C

**Comment:** Is it feasible to cover the entire floor with covering. How is it determined which sections are covered and which are not? How will the covering be collected, managed, characterized, and disposed? How will the contaminated packaging be collected, characterized and disposed?

3. Commenting Organization: Ohio EPA Commentor: DHWM  
Section #: 5.3.2 Pg. #: na Line: na Code: C

**Comment:** Describe the secondary containment to be used?

4. Commenting Organization: Ohio EPA Commentor: DHWM  
Section #: 5.3.2 Pg. #: na Line: na Code: C

**Comment:** The Work Plan states that every effort will be made to collect liquids. When would it not be collected and what would be its disposition when it isn't? Collected liquids should be recharacterized if potentially in contact with other wastes. Describe the characterization process.