

Answers Regarding the Sitewide Treatment Facility

Question: Will any new waste streams be sent to Bldg. 891 before the treatment and collection systems are administratively de-coupled from the OU-1 IM/IRA decision document? If so, do we need to modify the IM/IRA decision document, and will this be done in time to meet the need?

Answer: No new waste streams are anticipated to be sent to Bldg. 891 prior to the OU-1 IM/IRA decision document being modified. However, Bldg. 891 is accepting and treating decon and groundwater well purge waters at this time. It is expected that this practice will continue. This activity has been approved by DOE and the regulators.

Question: When and how will we take the action to administratively de-couple the treatment facilities from any particular OU?

Answer: The present IM/IRA decision documents for OU-1 and the OU-2 Field Treatability Unit to remove the treatment equipment from the IM/IRA. A new IM/IRA will be developed to cover operations of the Sitewide Water Treatment Facility. These actions are underway and must be completed prior to installation of the treatment equipment in the new facility. It is estimated that the IM/IRA modifications and the new IM/IRA will be completed and approved by June of 1995.

Question: Will this facility need a RCRA, NPDES, or CAA permit, and why for each? This analysis should be done considering all waste streams known to need treatment here and for anticipated waste streams?

Answer: While the facility will meet RCRA requirements, the facility does not require RCRA permitting at this time. The anticipated waste streams (OU's 1, 2, 4, and 7) do not require RCRA permitting. If in the future, it is determined that a RCRA permit will be required, the permit application and approval process is all that will be required.

A NPDES is not required for treatment of CERCLA waters.

An air emissions evaluation will be performed by Air Quality personnel to determine if a CAA permit is required. Based on current OU-1 and OU-2 emissions, it is estimated that an APEN will be sufficient.

Question: On what page is this facility included in the Draft Site Treatment Plan? If it is not in the plan, why not?

Answer: This facility is not included in the DSTP since this project was envisioned just prior to the latest revision to the DSTP.

Question: Is there a treatment alternative for any waste stream whose treatment in 891 necessitates obtaining a permit?

Answer: Wastes requiring a permit cannot be treated at the facility without obtaining a RCRA permit. However, the Bldg. 374 Evaporator is scheduled to install a Ultra-Violet/Oxidation unit to treat some RCRA wastes contaminated with VOCs. See the attached RCRA CLASSIFICATION FOR SITEWIDE TREATMENT FACILITY SOURCES for a description of potential waste streams.

Question: When will the WSRIC book for this facility be developed?

Answer: The present Building 891 WSRIC will be modified beginning in January 1995, and is scheduled to be completed by April 18, 1995.

Question: Will operation of this facility generate any new types of waste, and if so what is the plan for it? Does it need to be included in the DSTP? What are the disposal alternatives for any new wastes?

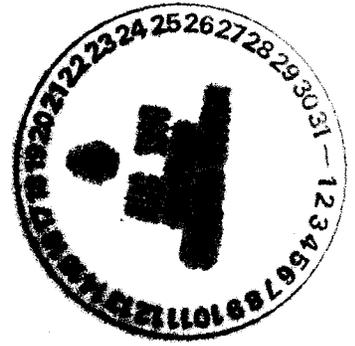
Answer: The pre-filtration unit, when used, will produce disposable filters contaminated with F-listed wastes. Segregation of radioactive waters will minimize (and possible eliminate) any of the filters being contaminated with radionuclides .

RCRA CLASSIFICATION FOR SITEWIDE TREATMENT FACILITY SOURCES

The sources listed below were evaluated for treatment at the Sitewide Facility. RCRA waters classified as "contained in" are acceptable for treatment at a IM/IRA facility. Any waters that are classified as "Derived from" must be treated under a RCRA permit, and cannot be discharged to the ground. This would result in a significant volume of water that would have to be stored and used for 'other' processes at RFETS.

<u>OU</u>	<u>Source</u>	<u>RCRA Classification</u>	<u>Justification</u>
OU-1	French drain Collection well	Contained in. Contained in.	Naturally occurring waters. Naturally occurring waters.
OU-2	Surface water SVE extracted groundwater Six-phase heating Soils washing	Contained in. Contained in. Contained in. Derived from.	Naturally occurring waters. Naturally occurring waters. Naturally occurring waters. Cannot be treated without a RCRA permit.
OU-4	Groundwater	Contained in.	Naturally occurring waters.
OU-5	Groundwater	Contained in.	Naturally occurring waters.
OU-7	Surface water seep Leachate collection	Contained in. Derived from.	Naturally occurring waters. Cannot be treated without a RCRA permit.
N/A	Decon pads	Contained in.*	Approval has been granted by DOE and Agencies to treat at building 891.
N/A	Purge water	Contained in.	Approval has been granted by DOE and Agencies to treat at building 891.
N/A	Incidental waters (precipitation only)	Contained in.	Naturally occurring waters.

* Decon water may be classified as contained in or derived from, depending upon the source of the water.



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