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**CLOSURE PLAN
US DOE - FMPC PLANT 6
OH6 890 008 978/05-31-0681**

02/22/90

**USEPA/DOE-FMPC
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LETTER
OU3**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Original File Copy

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Richard F. Celeste
Governor

CLOSURE PLAN DISAPPROVAL

Issuance Date February 22, 1990
Effective Date March 22, 1990

CERTIFIED MAIL

February 22, 1990

Re: CLOSURE PLAN
USDOE - FMPC Plant 6
OH6 890 008 976/05-31-0681

James A. Reafsnyder
FMPC Site Manager
USDOE - FMPC
P.O. Box 398705
Cincinnati, OH 45239-8705

Dear Mr. Reafsnyder:

On August 3, 1989, USDOE - FMPC submitted to Ohio EPA a closure plan for the Plant 6 hazardous waste storage pad located near Fernald, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the USDOE - FMPC's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of the USDOE - FMPC in accordance with OAC Rule 3745-66-12. The public comment period extended from August 18, 1989, to September 18, 1989. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal, I conclude that the closure plan for the hazardous waste facility at the USDOE - FMPC does not meet the performance standard contained in OAC Rule 3745-66-11 and does not comply with the pertinent parts of OAC Rule 3745-66-12.

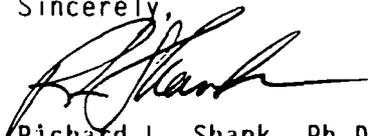
The closure plan submitted to Ohio EPA by the USDOE - FMPC is hereby disapproved (See Attachment A).

Date Rec'd FEB 27 1990
Log D-1271
File _____
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You are notified that this action of the Director is issued as a proposed action pursuant to ORC Section 3745.07. This action will become final on the effective date indicated unless you or an objector files an appeal requesting an adjudication hearing within (30) days of the date of issuance of this action. The adjudication hearing will be conducted in accordance with OAC Chapter 3745-47. The request for a hearing shall specify the issues of fact and law to be contested. Requests for hearings shall be sent to: Ohio Environmental Protection Agency, Hearing Clerk, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43266-0149.

A modified closure plan addressing the points in Attachment A must be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter in accordance with OAC 3745-66-12. The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Paul Pardi, Southwest District Office, 40 South Main Street, Dayton, Ohio 45402.

Sincerely,



Richard L. Shank, Ph.D.
Director

RLS/RM/pas

cc: Paul Pardi, SWDO, Ohio EPA
Don Marshall, SWDO, Ohio EPA
Randy Meyer, DSHWM, Ohio EPA
Tom Crepeau, DSHWM, Ohio EPA
Lisa Pierard, USEPA Region V
Joel Morbito, USEPA Region V

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ATTACHMENT A
USDOE-FMPC
PLANT 6 STORAGE AREA
CLOSURE PLAN DEFICIENCIES

1076

1. Provide a topographic map or equivalent map of the area surrounding the Plant 6 Storage Pad, showing the direction of surface run-on/run-off. Also provide a map which shows the location of any storm drains in the vicinity of the storage pad.
2. If available, provide laboratory analysis results for any hazardous waste stored on the Plant 6 pad.
3. Since this pad was never diked, there is the potential that areas surrounding the pad have been contaminated. The closure plan must address sampling of these surrounding areas.
4. Clean standards for determining decontamination effectiveness shall be consistent with the policy described below. These standards apply to the decontamination of the pad as well as to the decontamination of any equipment used during the closure effort. The closure plan must be revised accordingly.

Rinseate samples shall be analyzed for all RCRA waste solvents stored on the Plant 6 pad, and for any EP Toxic metals that may have been a constituent of the waste stored on the pad. The pad and equipment shall not be considered decontaminated until the final rinseate does not exceed the public drinking water maximum contaminant level (MCL) for any hazardous constituent. If an MCL has not been promulgated for the constituent of concern, the maximum contaminant level goal (MCLG) shall be used. If neither an MCL nor an MCLG has been promulgated, 1 mg/l shall be used as the clean standard.

If the MCLG is less than the contaminant's analytical detection limit using methods found in USEPA Publication SW-846, the SW-846 analytical detection limit shall be used as the clean standard.

5. The closure plan mentions both washwater sampling and wipe sampling when addressing the determination of decontamination effectiveness. The plan elaborates on the washwater sampling analysis but there is no further mention of procedures for wipe sampling and wipe sample analysis. DOE shall use washwater sampling where practical. If wipe sampling will be used for determining decontamination effectiveness, then describe procedures for this technique.
6. Describe in greater detail the steam cleaning process. Describe the procedures to be used for the collection and containerization of rinse waters. Provide an estimate of the quantity of rinse water that will be generated by the decontamination process.
7. Should contamination of underlying or surrounding soil be detected, soil removal and confirmation sampling will be necessary to ensure that all contaminated soil is removed. The plan must address procedures for soil removal and for confirmation sampling. If all contaminated soil, including ground water, cannot be removed, DOE shall notify Ohio EPA, SWDO, and continue

sampling under the guidance of Ohio EPA, SWDO, to determine the full extent of contamination, and submit within 30 days of completion of the supplementary sampling program, an amended closure plan providing for an alternate means of closure.

8. The closure plan does not address the current condition of the pad. Should cracks or holes exist that could have allowed the migration of contaminants to underlying soils, soil samples must be collected from these areas. Revise the closure plan to address the integrity of the pad, and specify soil sampling points as appropriate.

9. The closure plan must include a complete sampling plan which includes the following:

a. The number of samples of rinseate that will be collected and the method for their collection.

b. The number and location of soil samples that will be collected and the method for their collection.

c. The number and location of samples that will be taken from areas surrounding the pad and the method for their collection.

d. Specific parameters for which the rinseate and soil samples will be analyzed, and the specific test methods for each parameter.

e. QA/QC information.

f. Any other information pertinent to the sampling that will be conducted as part of the Plant 6 pad closure.

The closure plan will not be approved without the inclusion of this information. It is not acceptable to submit this information as a separate document at a later date.

10. It is stated in the introduction to the closure plan that all references to hazardous waste will be assumed to mean hazardous/radioactive (mixed) waste. It is not acceptable to make this assumption. The plan must be revised to describe how this determination will be made analytically.

11. The introduction states that drums were stored on pallets. The plan does not address the disposition of these pallets. If they still exist at this location, provisions for inspection and possible decontamination/disposal of these pallets must be included in the plan.

12. Any materials associated with this closure, including the concrete pad, not shown to have been adequately decontaminated for F002 hazardous constituents (see rinseate standards) shall be managed as hazardous waste. Materials contaminated with lead only may be managed as solid waste if the material does not exhibit the characteristic of EP toxicity for lead.

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