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FMPC PIT 4 INTERIM CLOSURE

08/19/88



Department of Energy
Oak Ridge Operations
P. O. Box E
Oak Ridge, Tennessee 37831

See - 1

*RCR
Item C.1.*

2645

August 19, 1988
DOE-1321-88

Dr. Richard L. Shank, Director
Ohio Environmental Protection Agency
1800 Watermark Dr.
Columbus, Ohio 43215

Dear Mr. Shank:

FMPC PIT 4 INTERIM CLOSURE

Reference: Letter, Shank to Reafsnyder, subject "Closure Plan - Interim Closure" U.S. Department of Energy, Feed Materials Production Center, OH6890008976, 05-31-0681," dated June 29, 1988

In an August 19, 1988 teleconference call with the Ohio EPA, DOE and WMCO, DOE/FMPC has received approval from OEPA to initiate an interim closure of Pit 4. Also as a result of this call all seventeen (17) concerns in the referenced letter have been resolved.

Attached is a summary explanation of each resolution. As agreed in the conference call, DOE/FMPC is submitting the modification resolutions for your concurrence. DOE/FMPC is prepared to begin construction on the interim closure of Pit #4 as soon as we receive OEPA written concurrence on the approval modifications and USEPA written approval of the interim closure plan.

Your expeditious reply on the above matters would be greatly appreciated.

Sincerely,

Ray Hansen

James A. Reafsnyder
Site Manager

DP-84:Craig

Attachment: As stated

2645

cc w/att:

C. McCord, USEPA-Region V
P. Vandermeer, OEPA-
G. Mitchell, OEPA-Dayton
D. Marshall, OEPA-Dayton
M. Stone, DP-84, DOE/FMPC
D. Carr, WMCO
M. Krauss, WMCO
T. Snider, WMCO

**MODIFICATIONS TO THE PIT 4 CLOSURE PLAN
PER JOINT CONFERENCE CALL
AUGUST 19, 1988**

1. 2 ft. of clay will be compacted in six (6) inch lifts to a permeability of no greater than 10^{-7} cm/sec.
2. DOE/FMPC shall provide information about permeability testing to Kim McGuire of the Ohio EPA.
3. The general equipment description for compacting soil is in the present construction specifications that have been previously submitted to OEPA. When a contractor is selected and the specific equipment is known DOE/FMPC will provide the information to OEPA.
4. Agreement was reached to delete this modification.
5. DOE/FMPC will provide OEPA/USEPA with information concerning monitoring and sampling procedures to be used during the interim closure. The monitoring plan will be applied to all vehicles and equipment used in the project to analyze for uranium contamination. The details of this plan will be submitted in an addendum to the original interim closure plan.
6. Agreement was reached to delete this modification.
7. Agreement was reached to delete this modification.
8. DOE/FMPC will provide OEPA and USEPA information on the volume of clay and soils needed to cover the pit and demonstrate that there is enough clay and soil of acceptable quality available on-site to complete the interim closure.
9. DOE/FMPC will provide information on the maintenance and testing of the Flexible Membrane Liner (FML). This plan will include weekly walkover inspections, and a proposed annual FML integrity testing plan. The plan will also include a corrective action plan to be followed based on the test results.
10. DOE/FMPC will have an independent engineer to monitor progress during critical closure activities and assess overall quality controls during the project. The critical activities include:
 - a. Sampling of clay for permeability
 - b. Review of the analysis data on clay permeability
 - c. Placement of fill material and clay cap on the pit
 - d. Installation of the FML

11. DOE/FMPC will notify Kim McGuire of the Ohio EPA 7 days prior to all critical closure activities.
12. DOE/FMPC will make every effort to complete the interim closure within 180 days after OEPA and USEPA approval is granted. The construction schedule will be dependent upon both the approval date and weather restrictions. If an extension beyond the 180 days is due to weather restrictions a request for extension will be filed and granted.
13. DOE/FMPC will submit a plan for final closure of Pit #4 ninety (90) days after receipt of the Record of Decision (ROD) on the RI/FS. The closure plan will be provided to OEPA and USEPA in a format consistent with CERCLA guidance for feasibility studies with additional information necessary to fulfill RCRA Closure requirements as an addendum.
14. Agreement was reached to delete this modification.
15. Agreement was reached to delete this modification.
16. Agreement was reached to delete this modification.
17. DOE/FMPC will provide OEPA/USEPA with the above agreed to information within 30 days of receipt of your concurrence.