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**COMPLIANCE SCHEDULE FOR THE FEMP PILOT  
PLANT NORTH AND SOUTH SOLVENT TANKS -  
HAZARDOUS WASTE MANAGEMENT UNIT**

03/20/92

**DOE-1185-92  
DOE-FO/OEPA  
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LETTER**



**Department of Energy**  
**Fernald Environmental Management Project**  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705  
(513) 738-6357

MAR 20 1992

DOE-1185-92

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Mr. Paul Pardi, Group Leader  
Solid & Hazardous Waste Management Unit  
Ohio Environmental Protection Agency  
40 South Main Street  
Dayton, Ohio 45402-2086

Dear Mr. Pardi:

**COMPLIANCE SCHEDULE FOR THE FEMP PILOT PLANT NORTH AND SOUTH SOLVENT TANKS -  
HAZARDOUS WASTE MANAGEMENT UNIT**

On January 21, 1992, the FEMP submitted the Quarterly Technical Progress Report as required by the Proposed Amended Consent Decree (PACD) Section 4.13. In this report the FEMP identified the Pilot Plant North and South Solvent Tanks as a Hazardous Waste Management Unit.

Section 3.12 of the PACD requires the FEMP to submit a schedule of activities for implementing hazardous waste requirements at newly identified Hazardous Waste Management Units. The enclosed schedule identifies the activities that will be completed at the North and South Solvent Tanks and the date by which these activities will be completed.

If you or your staff have any questions, please contact Dave Rast at (513) 738-6322.

Sincerely,

R. E. Tiller  
Manager

FN:Rast

Enclosure: As Stated

cc w/enc.:

R. P. Whitfield, EM-40, FORS  
K. A. Hayes, EM-424, TREV  
J. A. Saric, USEPA-V, HRE-8J  
G. E. Mitchell, OEPA-Dayton  
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J. Harmon, WEMCO  
E. D. Savage, WEMCO  
D. A. Yeager, WEMCO  
R. L. Glenn, Parsons  
AR Coordinator, WEMCO

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**COMPLIANCE SCHEDULE  
FEMP PILOT PLANT NORTH AND SOUTH SOLVENT TANKS**

1. Provide training to personnel involved in work at or near the vicinity of this unit which will instruct those personnel to perform their duties in a manner that ensures facility compliance. (OAC 3745-65-16)  
Completion Date: 05/01/92
2. Update training records to show that personnel who work at or near the vicinity of this unit have been trained to perform their duties in a manner that ensures facility compliance.  
Completion Date: 05/01/92
3. Initiate and maintain records of daily unit inspections. (OAC 3745-65-15, OAC 3745-66-95)  
Completion Date: 05/04/92
4. Complete the posting of the required signs, "No Smoking, Match, or Open Flame" and "Danger-Unauthorized Personnel Keep Out," or equivalent at all entrances to the unit and at other locations in sufficient quantities to be visible from any approach. The signs will be visible from a distance of at least 25 feet. (OAC 3745-65-14)  
Completion Date: 07/17/92
5. Incorporate into the written Contingency Plan the requirements to minimize hazards from fire, explosions or unplanned releases of hazardous wastes from the unit. (OAC 3745-65-52)  
Completion Date: 08/14/92
6. Update general site worker annual review training to address this unit and to teach facility personnel to perform their duties in a manner that ensures facility compliance. (OAC 3745-65-16)  
Completion Date: 04/07/93
7. Update general site worker annual review training records to show that site personnel have been trained to perform their duties at this unit in a manner that ensures facility compliance. (OAC 3745-65-16)  
Completion Date: 06/11/93
8. Transfer any remaining wastes from the unit and manage in accordance with the Proposed Amended Consent Decree and appropriate regulatory requirements.  
Completion Date: 07/30/93

**COMPLIANCE SCHEDULE**  
**FEMP PILOT PLANT NORTH AND SOUTH SOLVENT TANKS**  
(Continued)



9. Submit a RCRA Annual Report to OEPA which includes information related to this unit occurring after March 20, 1991. (OAC 3745-65-75)  
  
Completion Date: 03/01/annually
10. Update the facility operating record, as needed, to include the description, quantity, and location of wastes stored or treated in the unit, and the results of any waste analysis, if available. (OAC 3745-65-73(B)(1); (B)(2)  
  
Completion Date: Ongoing
11. Update and maintain the Waste Analysis Plan (WAP), as necessary, to include any hazardous waste streams treated or stored in this unit not previously included in the WAP. (OAC 3745-65-13)  
  
Completion Date: Ongoing
12. Submit Closure Plan Information in accordance with the Proposed Amended Consent Decree. This plan will integrate OEPA hazardous waste requirements with the cleanup requirements of CERCLA and the DOE-USEPA Consent Agreement, and will contain a schedule for closure activities. (OAC 3745-66-12)  
  
Completion Date: 07/31/97