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**CLOSURE PLAN U. S. DOE-FN MANAGEMENT
PROJECT
OH6 890 008 976
05-31-0681**

01/11/93

**OEPA/DOE-FN
4
LETTER**



State of Ohio Environmental Protection Agency

G-01619

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Columbus, Ohio 43266-0149
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George V. Voinovich
Governor
Donald R. Schregardus
Director

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CERTIFIED MAIL

NOTICE OF DEFICIENCY

January 11, 1993

Mr. W.D. Adams
Acting Manager
Fernald Office
U.S. DOE-FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: CLOSURE PLAN
U.S. DEPARTMENT OF ENERGY-FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT
OH6 890 008 976
05-31-0681

Dear Mr. Adams:

On October 7, 1992 Ohio EPA received from the U.S. Department of Energy-Fernald Environmental Management Project a closure plan for Hazardous Waste Management Unit #6 (HF residue storage area) which was used for storage of hazardous waste.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the U.S. Department of Energy-Fernald Environmental Management Project's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

In accordance with OAC 3745-66-12, the public was given the opportunity to submit written comments regarding the plan. The public comment period extended from November 2, 1992 through December 8, 1992. No public comments were received by the Ohio EPA.

Pursuant to OAC Rule(s) 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, as outlined within the attachment. Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in the attachment be submitted to the Director for approval within thirty (30) days of your receipt of this letter.



Mr. W.D. Adams

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The closure plan shall be modified in accordance with the following editorial protocol:

1. Old language is overstruck.
2. New language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be renumbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, ATTN: Mr. Tom Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. An additional copy should also be forwarded to: Ohio Environmental Protection Agency, SWDO, ATTN: Group Leader, DHWM, 40 South Main Street, Dayton, Ohio 45402.

Upon review of the re-submitted plan, I will prepare and issue a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Robin Fisher at (513) 285-6357.

Sincerely,


Donald R. Schregardus
Director

cc: Tom Crepeau, DHWM, Central File, Ohio EPA
Randy Meyer, CO, Ohio EPA
Harold O'Connell, SWDO, Ohio EPA

ATTACHMENTDEPARTMENT OF ENERGY
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
HAZARDOUS WASTE MANAGEMENT UNIT #6
HF RESIDUE STORAGE AREA

OH6 890 008 976

Specific Comments:

1. Section 3.1.1, Page 11, Item 2 - The closure plan states that the Cleanup Action Level (CAL) for pH will be 2.0 to 12.5. This is acceptable; however, the plan states that this range is based on the normal pH levels of soils in Ohio according to the May 1, 1991 Ohio EPA Closure Plan Review Guidance. The Guidance actually states that the background soil pH in Ohio ranges from about 4.7 to 9.0 (see p. 33 of the Closure Plan Review Guidance). Regardless, the use of Ohio farm soil data should not be used as a clean standard for rinseate from a concrete pad. Please modify this section of the closure plan to indicate that the 2.0 to 12.5 pH range to be used for the CAL is based on the definition of a characteristic corrosive waste and not on the normal pH level of Ohio farm soils. This information must be provided in accordance with OAC 3745-66-12(B)(4).
2. Section 3.2.1, Page 13, Item 5 - The plan does not provide an adequate description of the cleansing process of the storage pad. Specifically, please include the type of equipment and personnel that will be needed for this procedure. This information must be provided in accordance with OAC 3745-66-12(B)(4).
3. Section 3.2.2, Page 15, Item 1 - The Sampling and Analysis Plan states that containment dikes will be used to control run-off during the decontamination process. Section 3.2.2 also outlines the procedures for decontamination of equipment during closure but fails to include this provision. Please modify this section of the closure plan to indicate that containment dikes will be used during the decontamination process. This information must be provided in accordance with OAC 3745-66-12(B)(5).

4. Section 5.0, Page 21 - The closure plan schedule indicates that closure activities would not be completed within 180 days of Ohio EPA approval of the plan. DOE-FEMP must remove the extra time period from the closure schedule or supply justification for the extension. The Ohio EPA would not normally consider internal administrative activities sufficient cause for an extension. This information must be provided in accordance with OAC 3745-66-13(B).

5. Table 1, Page 23 and Page A-15 - The Cleanup Action Level (CAL) for total Fluorides is listed in the closure plan as 60 mg/l (fifteen times the MCL). The Ohio EPA requires that if the product of fifteen times the MCL or MCLG exceeds 1 mg/l, 1 mg/l shall be used as the clean standard. Please modify Table 1 to indicate that the CAL for Total Fluorides is 1 mg/l. This information must be provided in accordance with OAC 3745-66-11.