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**OHIO EPA COMMENT DISPOSITION RECORD
NITRIC ACID TANK CR CAN AREA REMOVAL
ACTION WORK PLAN AND CLOSURE PLAN
INFORMATION AND DATE PACKAGE MARCH
1993**

DOE-FN/EPA

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RESPONSES

OHIO EPA COMMENT DISPOSITION RECORD

**NITRIC ACID TANK CAR AND AREA
Removal Action Work Plan and
Closure Plan Information and Data Package**

Fernald Environmental Management Project

March 1993

COMMENT DISPOSITION RECORD

Document: Nitric Acid Tank Car Removal Action #25, Draft Final RAWP/CPID

Reviewer: OHIO EPA

#	COMMENT	PROPOSED DISPOSITION
1	DOE-FEMP should indicate when the closure plan will be submitted to the Director, Ohio EPA, in order to begin the RCRA closure approval process.	Copies of the Draft Final RAWP/CPID, dated January 1993, were sent to the Ohio EPA offices in Columbus, Ohio. Upon revision of the RAWP/CPID to incorporate the comments listed below, it will be reissued as Final and a copy will be sent directly to the Director of the Ohio EPA. Affected pages: None.
2	Per Comment 10 of the DOE-FEMP U.S. EPA and Ohio EPA Comments and Disposition Records, the draft final document contains new information on the proposed neutralization and treatment of the tank car contents, however, this information does not address the demonstration requests regarding chemical reaction contained in Comment 10.	The discussion of the UNH system's neutralization and treatment steps will be expanded to reference the <i>UNH Blending and Neutralization Standard Operating Procedure</i> , which details the specific measures and controls that ensure controlled chemical reactions. Affected pages: 3-5.
3	DOE-FEMP proposes that the standard of clean for inorganic-contaminated soil is to be a comparison to FEMP background concentrations as determined by the FEMP soil background study. The RAWP/CPID should include the background values if available.	The final RAWP/CPID will include the background value for chromium. Affected pages: 4-1.
4	The RAWP/CPID does not completely satisfy the requirements of QAC 3745-66-11 (Closure Performance Standard) in that the plan does not address actions to be taken with the waste once it is contained in the UNH system. DOE/FEMP indicates that the responsibility for treatment and disposal of the tank car contents is assigned to the Removal Action No. 20 UNH System. The plan should establish a better linkage with RA No. 20, to identify a time schedule for when treatment of the nitric acid waste will occur.	The RAWP/CPID will be revised to create a more explicit tie between the Nitric Acid Tank Car action and Removal Action 20. Affected pages: 3-5, 5-1.