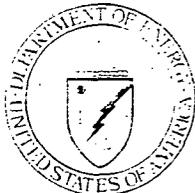


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**EXTENSION OF CLOSURE SCHEDULES FOR THE
TRANE LIQUID WASTE INCINERATOR,
STORAGE PAD NORTH OF PLANT 6, AND THE
BULK SOLVENT STORAGE TANKS T5 AND T6**

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**DOE-FN/OEPA
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LETTER**



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

MAY 21 1993

DOE-1971-93

Mr. Donald R. Schregardus
 Director of Ohio EPA
 P. O. Box 1049
 1800 WaterMark Drive
 Columbus, OH 43266-0149

Dear Mr. Schregardus:

EXTENSION OF CLOSURE SCHEDULES FOR THE TRANE LIQUID WASTE INCINERATOR, STORAGE PAD NORTH OF PLANT 6, AND THE BULK SOLVENT STORAGE TANKS T5 AND T6.

On April 6, 1993, representatives of the Ohio Environmental Protection Agency (OEPA), Southwest District Office, met with staff from the U.S. Department of Energy (DOE) and the Fernald Environmental Management Corporation (FERMCO) to discuss the status of closure plan information and data (CPID) for the Hazardous Waste Management Units (HWMU's) at the Fernald Environmental Management Project (FEMP). As a result of that meeting, DOE was advised to request an extension to the closure schedules for three of the HWMU's. The purpose of this letter is to formally request extensions of the closure period for the Trane Liquid Waste Incinerator, the Storage Pad North of Plant 6, and the Bulk Solvent Storage Tanks T5 and T6.

Trane Liquid Waste Incinerator

In February 1990, the OEPA approved (with comment) Revision 1 of the closure plan for the Trane Liquid Waste Incinerator. In July 1990, Revision 2 of the closure plan was submitted in response to the OEPA comments and also addressed additional ancillary equipment identified in 1989. In the Revision 2 transmittal letter an extension of closure was requested. Although Revision 2 of the closure plan for the Trane Incinerator has been discussed with representatives of the OEPA, no approval has yet been issued.

Upon review of Revision 2, the FEMP determined that additional revisions are necessary. Revision 3 to the CPID will clarify proposed closure actions and address technical issues, changes in OEPA regulations, and amendments to site legal agreements since the previous submittal. One important area of the plan currently being re-evaluated is sampling and analysis. Revision 3 will incorporate changes in the type of samples and number of data points required to complete closure actions for this type of unit. Changes in Amended Consent Agreement between the DOE and the USEPA, the approval of the CERCLA Sitewide

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Quality Assurance Project Plan, and new requirements for waste minimization will be reflected in the revised CPID. In addition, the following specific revisions will be included:

- a. The Sampling and Analysis Plan (SAP) will be revised using the Data Quality Objectives (DQO) process to better characterize an incinerator type of inactive HWMU for closure actions. The previous revisions did not have the benefit of the DQO process and thus were not focused on the closure requirements for this type of unit.
- b. The Soils Background Sampling Plan was completed and approved after Revision 2. Revision 3 will use the Plan as a basis of comparison and apply the results to remediation of the Trane Incinerator.
- c. The OEPA Closure Plan Review Guidance was modified subsequent to Revision 2 of the Trane Incinerator closure plan. These changes affect the kind of sampling needed.
- d. Under a new site program, preliminary screening samples are being collected to better characterize the unit and determine the necessary closure requirements. The HWMU characterization will be summarized and any supporting data will be included in the Revision 3 of the CPID.
- e. Revision 3 will be re-written to be consistent with the format for previous FEMP CPID submittals, and to include all revisions and updated information in one document.

In accordance with OAC 3745-66-13(B), the FEMP hereby requests an extension for the initiation and completion of the necessary closure actions for the Trane Liquid Waste Incinerator. A schedule for closure actions will be included in Revision 3 of the CPID, to be submitted to the OEPA by August 30, 1993. The start date for closure will be the date that the FEMP receives OEPA approval of the revised CPID, Revision 3. Closure actions will be completed following the schedule in the approved CPID, Revision 3.

Storage Pad North of Plant 6 and Bulk Solvent Storage Tanks T5 and T6

On October 22, 1991, the OEPA approved the Closure Plan for the Storage Pad North of Plant 6 and the Closure Plan Information and Data (CPID) for the Bulk Storage Tanks T5 and T6. In support of the closures, a background soil study was to be completed for comparison with soil samples collected during closure. An extension of closure was requested in February 1992 based on the estimated time required for completion of the background soil study. Conditional approval of the background soil sampling and analysis plan was received from OEPA March 18, 1992. Per the February request for extension, the approval on March 18, 1992 meant that the date for completion and certification of closures should have been completed December 25, 1992. Field closure actions for these HWMUs, including washing and rinsing of the containment pads and tanks, were completed in the spring of 1992. Completion of the evaluations of results was delayed because of a problem with the validation of the sampling and analysis data from the soils and final rinse. The delay stems from not

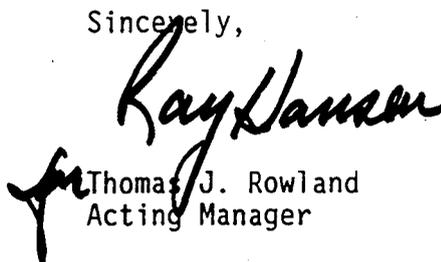
from not establishing proper Data Quality Objectives and validation requirements when implementing the site sampling and analysis plan.

The initial review of data (yet to be validated) from samples collected after washing and rinsing indicated that clean closure has not been achieved under the approved CPID for the Bulk Solvent Storage Tanks T5 and T6. As a result, the FEMP needs to determine how the additional actions necessary to complete remediation/closure of Tanks T5 and T6 will be completed as part of the ongoing CERCLA program, as discussed in the April 6, 1993, meeting. The initial review of data (yet to be validated) for the Storage Pad North of Plant 6 indicates that clean closure has been achieved. The extension is requested to provide sufficient time to validate the data for both closures and come to a proper conclusion concerning closure certification.

In accordance with OAC 3745-66-13(B), the FEMP hereby requests an extension for completion of a closure report and certification of closure of the Storage Pad North of Plant 6 and preparation of a closure status report/revised CPID for the Bulk Solvent Storage Tanks T5 and T6 until June 30, 1993.

If you or your staff have any questions concerning the discussions in this letter, please contact John Sattler at (513) 648-3145.

Sincerely,


Thomas J. Rowland
Acting Manager

FN:Sattler

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Administrative Record