

4791

**CLOSURE PLAN U.S. DEPT. OF ENERGY -
FERNALD ENVIRONMENTAL MANAGEMENT
PROJECT OH6 80 008 976 05/31/0681**

10/04/93

**OEPA/DOE-FN
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LETTER**



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

Donald R. Schregardus
4791 Director

NOTICE OF DEFICIENCY

CERTIFIED MAIL

October 4, 1993

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

Mr. Raymond J. Hansen
Acting Manager
Fernald Office
U.S. DOE-FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Hansen:

On May 7, 1992, Ohio EPA received from the U.S. Department of Energy-Fernald Environmental Management Project a closure plan for Hazardous Waste Management Unit #38 (HF Tank Car), an unpermitted storage unit located at 7400 Willey Road, Fernald, Ohio. Per a December 9, 1992, Notice of Deficiency (NOD), a revision to the closure plan was received on June 2, 1993.

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.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule(s) 3745-66-12. The public comment period extended from November 23, 1992 through December 25, 1992. No public comments were received by Ohio EPA.

Pursuant to OAC Rule 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

79.11

Mr. Raymond J. Hansen
U.S. DOE-FEMP
Page Two

Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

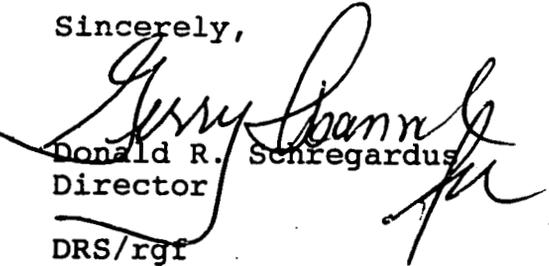
The modified closure plan shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck, but not obliterated.
2. New language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, 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, Attention: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Robin Fisher, Ohio EPA, Southwest District Office, 40 South Main Street, 5th Floor, Dayton, Ohio 45402.

Upon review of the resubmitted 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

DRS/rgf

cc: Tom Crepeau, OEPA, DHWM Central File
Randy Meyer, OEPA, DHWM
Section Chief, Ohio Permit Section, USEPA, Region V
Robin Fisher, OEPA, Southwest District Office

ATTACHMENT A

DEPARTMENT OF ENERGY
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
HYDROGEN FLUORIDE (HF) TANK CAR

OH6 890 008 976

General Comment:

The closure plan was reviewed based upon the use of elementary neutralization (lime slurry) as the chosen neutralization process; however, the submittal letter that accompanied the closure plan indicates that three alternative methods for neutralizing the hydrofluoric acid are still under consideration. If the bench scale tests indicate that an alternate neutralization agent should be used, the U.S. DOE-FEMP must submit an amended plan to the Ohio EPA. Changes within the amended plan would be subject to additional comment by the Agency.

Specific Comments:

1. Section 3.2, Page 9 - The closure plan fails to provide detailed information regarding the transportation of the tank car to the secondary containment area. The following information must be provided in accordance with OAC 3745-66-12(B)(3):
 - a) Detailed procedures for moving the tank car.
 - b) Precautions taken to avoid leaks or spills.
 - c) Safety equipment available in case of a leak or spill.
2. Section 3.1.1, Page 9 - The closure plan indicates that the clean levels for soil will be 2.0 to 12.5. Please revise the closure plan to indicate that the clean level for soils will be 4.7 to 9.0 as per the Closure Plan Review Guidance Document (page 33). This information must be provided in accordance with OAC 3745-66-12(B)(4).
3. Section 3.2, Page 10 - The closure plan fails to provide the bench scale test results that confirm that the proposed design will safely achieve the required neutralization. Please amend the closure plan to include a copy of the appropriate bench scale test results. This information must be provided in accordance with OAC 3745-66-12(B)(3).

4. Section 3.2, Page 12, Number 7 - The closure plan states that the filter cake will be tested to determine if it fails TCLP for metals; however, the plan does not indicate how it will be managed if the results of the TCLP exceed the regulatory limits. Please amend the closure plan to include provisions for dealing with the filter cake if it is determined to be a hazardous waste. This information must be provided in accordance with OAC 3745-66-12(B)(4).

5. Sampling and Analysis Plan, Section 2.5, Page A-7 - The closure plan describes the methods for decontamination of sampling and decontamination equipment but fails to indicate that the equipment used in the neutralization process (ie. Reactor A and B, ancillary equipment, etc.) will also be decontaminated when neutralization is completed. Revise the closure plan to indicate that the equipment used in the neutralization process will be decontaminated in a manner consistent with Section 2.5 of the Sampling and Analysis Plan. This information must be provided in accordance with OAC 3745-66-12(B)(4).

END OF CLOSURE COMMENTS