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**DOE-FEMP HAMILTON COUNTY HAZARDOUS
WASTE**

11/29/93

**OEPA/DOE-FN
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LETTER**



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

November 29, 1993

Re: DOE-FEMP
HAMILTON COUNTY
HAZARDOUS WASTE

Mr. J. Phil Hamric
Manager, DOE-FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Hamric:

This letter is written in response to your letter of November 10, 1993, in which DOE requests an extension to existing timelines for the submittal of certain CPID documents. This extension would allow DOE to review data generated from ongoing CERCLA activities at the site. An analysis of this data will assist DOE and the Ohio EPA in making a decision on the best way to proceed with closure activities for some of the HWMUs at FEMP.

The Ohio EPA will allow this extension for those units listed in the attachment to your letter with the heading Inactive Units to be Closed Under CERCLA. Since concurrence has not been reached as to how these units will be closed, Ohio EPA requests that the heading to this list be revised to more accurately reflect the status of these units. Ohio EPA suggests "Inactive Units Proposed to be Closed Under CERCLA/RCRA Integrated Process". Ohio EPA is granting this extension with the understanding that DOE will, where appropriate, continue to reduce the risk of many of the HWMUs through removal, "safe shutdown", and other activities. Per Tom Winston's letter of November 15, 1993, the Ohio EPA is particularly interested in the status of the UNH Removal Action, and request that removal activities resume for these units.

The draft RI report for OU5 will be available in March, 1994. By April 15, 1994, DOE must submit a revised schedule for the submittal of closure documents for those units which are the subject of the extension granted by this letter.

In the effort to develop a strategy for integrating the RCRA closure process with the CERCLA process, Ohio EPA is committed to providing DOE-FERMCO with a list of major components of a RCRA

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closure plan. This list is provided as an enclosure with this letter. Note that the applicable sections of the Ohio EPA Closure Guidance Document are referenced for each major component. Do not hesitate to call Phil Harris, Robin Fisher, or me at (513) 285-6357 if you have any questions regarding this list.

Sincerely,



Paul D. Pardi
Group Leader
Division of Hazardous Waste Management

PDP/acp

Enclosure

cc: Ken Alkema, FERMCO
Graham Mitchell, OEPA, SWDO

MAJOR COMPONENTS OF A CLOSURE PLAN

1. Description/Detailed Drawing of Waste Management Unit(s) to be Closed - (Closure Guidance Items 3.2 and 3.4)
2. List of Hazardous Waste(s) Managed in Units(s) - (Closure Guidance Item 3.5)
3. Removal of Waste - (Closure Guidance Item 3.6)
4. Schedule for Closure - (Closure Guidance Item 3.7)
5. Health & Safety Issues - (Closure Guidance Item 3.9)
6. Decontamination Efforts - (Closure Guidance Item 3.10)
7. Remediation Standards for Soils & Ground Water - (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.12)
8. Sampling Plan and Analytical Procedures - (Closure Guidance Item 3.13) - Includes sampling to define the extent of contamination and sampling to verify unit is clean.
9. Description of Removal Efforts and Treatment Processes - (Closure Guidance Item 3.14)
10. Landfill Closure (Dirty Closure) Requirements (if applicable) - (Closure Guidance Item 3.15)
11. Certification - (Closure Guidance Item 3.16)
12. Status of Facility (or Unit) After Closure - (Closure Guidance Item 3.17)