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**HAZARDOUS WASTE MANAGEMENT UNIT  
CLOSURE SUBMITTALS, REQUEST FOR  
EXTENSION**

**11/10/93**

**DOE-0322-94  
DOE-FN/OEPA  
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LETTER**



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

**NOV 10 1993**

DOE-0322-94

Mr. Paul D. Pardi  
Hazardous Waste Group Leader  
Ohio Environmental Protection Agency  
Southwest District Office  
40 South Main Street  
Dayton, OH 45402-2086

Dear Mr. Pardi:

**HAZARDOUS WASTE MANAGEMENT UNIT CLOSURE SUBMITTALS, REQUEST FOR EXTENSION**

This letter requests Ohio Environmental Protection Agency (OEPA) to grant an extension for any upcoming submittals of FEMP Closure Plan Information and Data (CPID) documents for the Hazardous Waste Management Units (HWMUs) listed on the attachment until the draft Remedial Investigation report for Comprehensive Environmental Response Compensation and Liability Act Resource Conservation and Recovery Act (CERCLA/RCRA) Unit 5 (CRU5) is available in March 1994.

This request is in no way an expression on Fernald Environmental Management Project (FEMP)'s part to delay cleanup of the site and, in particular, these HWMUs. It is in fact an attempt to facilitate cleanup of these units by integrating them with cleanup activities under CERCLA. It is our opinion that time and resources can be saved and that Ohio EPA cleanup requirements can be better served through the comprehensive cleanup of the whole FEMP rather than concentrating just on the areas within the regulatory jurisdiction of a HWMU.

While the FEMP and OEPA work together to address this integrated CERCLA/RCRA approach, the FEMP will proceed with clean closure of the HWMUs listed on the Attachment. We will also continue to reduce the risk of many of the HWMUs through removal, "safe shutdown", and other activities. The attachment lists the units which the FEMP is reevaluating the HWMU determination. The attachment also identifies those units which OEPA concurs that are no longer HWMUs.

We have been working together over the past several months to come to an agreement on how to best integrate the CERCLA and RCRA activities with significant successes in the area of groundwater monitoring. Our efforts to determine the best way to integrate the closures has also made progress. However, while we negotiate to find agreement, we continue to spend a lot of effort producing information on HWMUs that we consider can be best cleaned up under CERCLA.

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By this request, we are suggesting that we use the next several months to see if we can come to agreement on the integration of the closure activities. In addition, the RI report for CRU5 will provide significant information upon which a decision on how and when to close these HWMUs should be based. At the end of the period, we would implement whatever schedule or plan that you would find acceptable.

If you or your staff have any questions regarding this matter, please contact John Sattler at (513) 648-3145.

Sincerely,

  
Wally Quaid  
for  
J. Phil Hamric  
Manager

FN:Sattler

Enclosure: As Stated

cc w/enc:

J. A. Saric, USEPA Reigon 5  
D. Freeman, EM-424 TREV  
R. Fisher, OEPA, Dayton  
P. Harris, OEPA, Dayton  
G. Mitchell, OEPA, Dayton  
N. C. Kaufman, FERMCO/1  
K. L. Alkema, FERMCO/65-2  
N. L. Redmon, FERMCO/52-2  
Administrative Record

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Inactive Units To Be Clean Closed Under RCRA

<u>Unit No.</u>	<u>Description</u>
3	Waste Oil Storage in Garage
4	Drum Storage Area Near Loading Dock (Lab)
5	Drum Storage Area South of W-26 (Lab)
6	Drummed HF Residue/Associated Storage Areas in Plant 4
7,8	Drummed HF Residue NW & S of Plant 4/South of Cooling Towers
9	Nitric Acid Rail Car
13	Wheelabrator Dust Collector
21	Hilco Oil Recovery *
26	Detrex Still
30	Barium Chloride Treatment Facility
31,32	Tank for Bulk Storage of Solvents, T-5 & T-6
36	Storage Pad North of Plant 6
38	HF Tank Car
52	North and South Solvent Tanks (Pilot Plant)
53	Safe Geometry Digestion Sump (Plant 1)

\* Undergoing HWMU re-evaluation. Will remain on list until evaluation is completed.

Inactive Units To Be Closed Under CERCLA

<u>Unit No.</u>	<u>Description</u>	<u>Reason for Delay</u>
1	Fire Training Facility	Soil contamination
10	NAR System Components	Large system and possible soil contamination
11	Tank Farm Sump	Soil Contamination
12	Wheelabrator *	Equipment better addressed under remediation
14	Box Furnace *	Possible soil contamination
15	Oxidation Furnace #1 *	Large Structure which would be better addressed under remediation
16	Primary Calciner *	Large structure which would be better addressed under remediation
17	Plant 8 East Drum Storage Pad	Soil Contamination
18	Plant 8 West Drum Storage Pad	Soil Contamination
22	Pilot Plant Sump	Soil contamination
25	Plant 1 Storage Building	Address under remediation
27	Waste Pit 4	Large volume of waste which would be better addressed under remediation
28	Trane Incinerator	Possible soil contamination
40	Biosurge Lagoon *	Large volume of waste better addressed under remediation
41	Sludge Drying Beds	Soil Contamination
42	Waste Pit 5	Large volume of waste which would be better addressed under remediation
46-50	UNH Tanks	Large system and possible soil contamination
51	Experimental Treatment Facility (ETF) *	Soil Contamination

\* Undergoing HMMU re-evaluation. Will remain on list until evaluation is completed.

Units To Be Closed Per Submitted Permit Application

<u>Unit No.</u>	<u>Description</u>
19	CP Storage Warehouse (Butler Bldg)
20	Plant 1 Storage Pad
29	Plant 8 Warehouse (Bldg 80)
33	Pilot Plant Warehouse (Bldg 68)
34	KC-2 Warehouse (Bldg 63)
35	Plant 9 Warehouse (Bldg 81)
37	Plant 6 Warehouse (Bldg 79)

Inactive Units No Longer Listed As HWMUs

<u>Unit No.</u>	<u>Description</u>
2	Parts Cleaner In Welding Shop (Bldg 12)
23	Well Drilling Storage Area
45	UST #5
24	Equipment Storage Area
39	Clearwell
43	Lime Sludge Ponds
44	Coal Pile Runoff