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**NOTICE OF DEFICIENCY CLOSURE PLAN
USDOE-FEMP (DETREX STILL - HWMU #26)**

02/01/94

**OEPA/DOE-FN
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LETTER**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

H-2197

-5148

George V. Voinovich
Governor

Donald R. Schregardus
Director

February 1, 1994

NOTICE OF DEFICIENCY

CERTIFIED MAIL

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

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

Dear Mr. Hamric:

On November 10, 1993, Ohio EPA received from the U.S. Department of Energy-Fernald Environmental Management Project a closure plan for Hazardous Waste Management Unit #26 (Detrex Still), an unpermitted storage unit located at 7400 Willey Road, Fernald, Ohio.

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 3745-66-12. The public comment period extended from November 22, 1993 through December 28, 1993. No public comments were received by Ohio EPA.

Mr. J. Phil Hamric
U.S. DOE-FEMP
Page Two

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. 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.

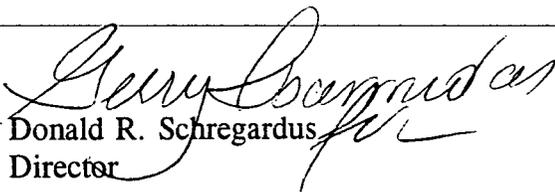
The modified closure plan shall be in accordance with the following editorial protocol or convention:

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
Harriet Croke, Ohio Permit Section, USEPA, Region V
Robin Fisher, OEPA, Southwest District Office

ATTACHMENT A

DEPARTMENT OF ENERGY
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
HAZARDOUS WASTE MANAGEMENT UNIT #26
DETREX STILL

OH6 890 008 976

Specific Comments:

1. Section 2.3, Pages 2-11 & 2-12 - The closure plan indicates that various components of the still (ie. pumps, valves, piping) will be compacted during closure of HWMU #26; however, the plan lacks sufficient information on this process. Please revise the plan to include the location where the compaction will take place, the equipment that will be utilized, and a detailed description of the process. The decontamination of the equipment must also be addressed within the closure plan. This information must be provided in accordance with OAC 3745-66-12(B)(3).
2. Section 4.4, Page 4-3 - The certification statement contained within the closure plan is incorrect. Revise the certification statement to include the exact wording found in OAC 3745-50-42(D). This information must be provided in accordance with OAC 3745-66-15.
3. Section 5.0, Page 5-1 - Within section 5.0 of the closure plan DOE-FEMP contends that the condenser is not a tank; however, plate 3, on page P-2, indicates that the condenser is a tank. Please correct this discrepancy within the closure plan. This information must be provided in accordance with OAC 3745-66-12.
4. Appendix 3, Page 1-4, Table 1-1 - The association of superscript #2 with Waste Number F003 is confusing. Please indicate in the revised closure plan whether this association was intentional or accidental. Given the information provided, superscript #4 may have been the intended notation. This information must be provided in accordance with OAC 3745-66-12.

END OF CLOSURE COMMENTS