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**TRANSMITTAL OF MODIFIED CLOSURE PLAN
INFORMATION DOCUMENT FOR DETREX STILL,
HAZARDOUS WASTE MANAGEMENT UNIT
NUMBER 26 REF:5291**

03/02/94

**DOE-1152-94
DOE/OEPA
3
RESPONSES**



Department of Energy
Fernald Environmental Management Project
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MAR 0 2 1994
DOE-1152-94

Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Attention: Tom Crepeau, Data Management Section
P. O. Box 1049
Columbus, OH 43266-0149

**TRANSMITTAL OF MODIFIED CLOSURE PLAN INFORMATION DOCUMENT FOR DETREX STILL,
HAZARDOUS WASTE MANAGEMENT UNIT NUMBER 26**

Reference: Letter, D. R. Schregardus to J. Phil Hamric, "Notice of Deficiency,"
dated February 1, 1994

Dear Mr. Crepeau:

Enclosed please find a copy of the replacement pages to the Closure Plan Information and Data (CPID) for the Detrex Still, Hazardous Waste Management Unit No. 26 (HWMU #26) at the Fernald Environmental Management Project (FEMP). When the pages of the original CPID are replaced with the revised pages, the resulting document will constitute a modified CPID.

The replacement pages for HWMU #26 incorporate changes to the CPID in response to the specific comments contained in Attachment A of the Notice of Deficiency (NOD) dated February 1, 1994, (see referenced letter), and received February 8, 1994. Revisions follow the editorial protocol or convention described in the NOD letter.

Also enclosed is a table titled "Comment Disposition Record." This table lists the specific comments found in the NOD letter and a description of how the comment is addressed in the modified CPID.

If you or your staff have any questions, please contact John Sattler at 513-648-3145.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Phil Hamric".

J. Phil Hamric
Manager

FN:Sattler

- 5290.

Enclosure: As Stated

cc w/enc:

P. Harris, OEPA-Dayton
J. Saric, USEPA-Region V
K. A. Hayes, EM-424 TREV
Administrative Record

cc w/o enc:

D. Schregardus, OEPA-Columbus
G. Mitchell, OEPA-Dayton
R. Meyer, OEPA-Columbus
M. McDermontt, DOJ
J. Van Kley, Ohio AGO
D. Ofte, FERMCO/1
K. Alkema, FERMCO/65-2
P. Clay, FERMCO/52-2
J. Curtis, FERMCO/8
J. Thiesing, FERMCO/2
D. Howe, RCRA Operating Record
N. Redmon, RCRA Closure Files, FERMCO/76

COMMENT DISPOSITION RECORD

Document: HWMU No. 26 - Detrex Still CPID, Rev. 1 - Response to Notice of Deficiencies

Reviewer: OEPA

No.	Comment	Proposed Disposition
1	<p>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.</p>	<p>The use of the term "compact" was incorrect. The FEMP does not utilize a "compaction process" for size reduction of piping or tanks, but, rather, cuts into manageable sections for disposition. The text was changed on pages 2-9 (Table 2-2), 2-11 (paragraph 3), and 2-12 (paragraph 4) by striking out the old language and capitalizing the new language. In addition, the location of the activity, the equipment used, and disposal/decontamination of the equipment is included. The process description is self-explanatory. Page 2-13 is included because the paragraph overlapped onto that page.</p>
2	<p>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).</p>	<p>The certification statement was changed to include the exact wording found in OAC 3745-50-42(D). The text was changed on pages 4-3 and 4-4 by striking out the old language and capitalizing the new language.</p>
3	<p>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.</p>	<p>Plate 3 on Page P-2, which is a photograph of the condenser unit, was mislabeled "Condensate Tank". The text was changed to "Condenser Unit" by striking out the old language and capitalizing the new language.</p>
4	<p>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.</p>	<p>In Table 1-1, Waste Number F003 (Acetone) was footnoted incorrectly "2". The footnote was changed to "4" by striking out the old footnote and adding the new footnote.</p>
*	<p>If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.</p>	<p>Sections 4.5 "Post-Closure Plan" and 4.6 "Notice in Deed" were bumped from page 4-3 to 4-4. Page iv. in the Table of Contents is revised to include this change.</p>