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**TRANSMITTAL OF MODIFIED CLOSURE PLAN
INFORMATION DOCUMENT FOR DRUM
STORAGE AREA NEAR LOADING DOCK,
HAZARDOUS WASTE MANAGEMENT UNIT
NUMBER 4 REF: 5293**

03/02/94

**DOE-1153-94
DOE/OEPA
4
RESPONSES**



Department of Energy
Fernald Environmental Management Project
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MAR 0 2 1994
DOE-1153-94

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 DRUM STORAGE AREA
NEAR LOADING DOCK, HAZARDOUS WASTE MANAGEMENT UNIT NUMBER 4**

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 Drum Storage Area Near Loading Dock (Lab), Hazardous Waste Management Unit No. 4 (HWMU #4) 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 #4 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 4, 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 black ink, appearing to read "J. Phil Hamric".

J. Phil Hamric
Manager

FN:Sattler

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. McDermonnt, 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. 4 - Drum Storage Area Near Loading Dock (Lab) - Response to Notice of Deficiencies

Reviewer: OEPA

No.	Comment	Proposed Disposition
1	<p>Section 3.2, Page 13 - The closure plan indicates that waste generated by sampling and analysis will be managed, stored, treated or disposed in accordance with applicable OEPA and USEPA solid and hazardous waste requirements and DOE Orders for low-level radioactive wastes. Please revise the closure plan to provide more specifics on how this waste will be managed.</p>	<p>The closure plan was revised to include more specific information on how the waste will be managed. Pages 13 and 14 show the old text struck out and the new text capitalized. Pages 15 through 17 are provided because the original text was repositioned.</p>
2	<p>Section 3.5, Page 18 - The closure plan states that the PQL will be used instead of the MDL in determining clean levels. The closure plan must be revised to elaborate on the criteria used for selecting the PQL over the MDL which is required by OEPA.</p>	<p>Section 3.5 on pages 18 through 20 was revised to use the Detection Limit (DL) in lieu of the Practical Quantitation Limit (PQL) as one of the three criteria for declaring the soil "clean". OEPA Closure Guidance - September 1993 shortened Method Detection Limit (MDL) to DL. The old text is struck out and the new text is capitalized. Pages 21 through 25 are provided because the original text was repositioned.</p>
3	<p>Table 2, Page 25 - The footnote states that FEMP Management reserves the right to establish and substitute risk-based cleanup levels if the listed cleanup action levels cannot be met. The closure plan must be amended to indicate that in this event a revised CPID would be submitted.</p>	<p>The footnote in Table 2 on Page 26 was revised to include that a revised CPID will be submitted in the event the cleanup action levels cannot be met. The new text is capitalized.</p>

4	<p>Table 2, Page 25 - The "applicable clean-up action levels" listed on Table 2 are no longer current. Please revise these levels within the modified closure plan to reflect the most recently published MCL or MCLG standard.</p>	<p>The "applicable clean-up action levels" listed in Table 2 were revised to reflect the most recently published MCL or MCLG standards (OEPA Closure Guidance - September 1993). The old text is struck out and the new text is provided. In addition, decontamination action levels for rinseate were incorporated into Section 3.5 on pages 18 and 19. The added text is capitalized.</p>
5	<p>Sampling\Analysis Plan, Section 1.1, Page B-2 - the sampling depths noted in this section and again in section 2.4, page B-8 of the SAP differ from those noted on page 14, section 3.3 of the closure plan. DOE-FEMP must make revisions to correct this discrepancy.</p>	<p>The sampling depths noted in Section 3.3 of the closure plan are correct (36" to 42") and Sections 1.1 (page B-2), 1.2 (page B-3), 2.4 (page B-8), and 2.4.1 (page B-9) of the Sampling and Analysis Plan were changed to reflect this. The old text is struck out and the new text is provided.</p>
6	<p>Sampling\Analysis Plan, Section 2.3.1, Page B-6, Item 3 - The number of samples from the final rinse noted in this section does not correspond with the number specified on page 14, section 3.3. of the closure plan. DOE-FEMP must make revisions to correct this discrepancy.</p>	<p>The number of samples (one) from the final rinse noted in Section 2.3.1 of the SAP is correct and Section 3.3 on page 15 of the CPID was changed to reflect this. In addition, Section 1.2 on page B-2 of the SAP was also changed to specify the collection of one rinseate sample. The old text is struck out and the new text is provided.</p>
*	<p>If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.</p>	<p>Page numbers are changed and the Table of Contents is revised to reflect these changes.</p>