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NOTICE OF DEFICIENCY - RE: CLOSURE PLAN

11/29/94

OEPA
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NOTICE

DOE-FN



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
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FERNALD 6276
I-0668
Dec 5 11 29 AM '94

George V. Voinovich
Governor

Donald R. Schregardus
Director

FILE: _____
LIBRARY: _____

NOTICE OF DEFICIENCY

CERTIFIED MAIL

November 29, 1994

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

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

Dear Mr. Hamric:

On December 27, 1993, Ohio EPA received from U.S. Department of Energy Fernald Environmental Management Project a closure plan for the North and South Solvent Tanks which are identified as Hazardous Waste Management Unit (HWMU) No. 52. 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 January 17, 1994 through February 2, 1994. No public comments were received by Ohio EPA.

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 require 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.

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

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 43216-1049. A copy should also be sent to: Mark Metcalf, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, Ohio 45402-2911.

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 Mark Metcalf at (513) 285-6357.

Sincerely,


Donald R. Schregardus
Director

DRS/MWM

cc: Tom Crepeau, OEPA, DHWM Central File
Ed Kitchen, OEPA, DHWM
Section Chief, Ohio Permit Section, USEPA, Region V
Mark Metcalf, OEPA, Southwest District Office

ATTACHMENT ADEPARTMENT OF ENERGY
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
NORTH AND SOUTH SOLVENT TANKS

OH6 890 008 976

1. Section 1.5.2 Ancillary Equipment- The closure plan fails to clearly delineate the boundaries of HWMU No. 52. Please revise the closure plan with a detailed drawing which shows the tank system and ancillary equipment that is addressed by this closure plan. This information must be submitted in accordance with OAC 3745-66-12(B)(2) and 3745-66-97(A).
2. Section 1.5.4 Waste Managed- The closure plan indicates that the waste from the North and South Solvent Tanks were shipped off-site with wastes from other tanks. This information was offered to address why the manifest which accompanied the wastes off-site also indicated that the waste stream was hazardous for lead. However there were no analyticals for the other wastes sent off-site with the North and South solvent Tanks. Please provide the analysis for tanks 17a,b and 5b.
3. Section 1.5.5 Soil Characterization- This section refers to a Figure 1-3 which indicates from where the four soil samples were taken, however this figure was not included in the closure plan. This information must be provided in accordance with OAC 3745-66-12(B)(4).
4. Section 2.3.1.1 The Tanks- This section fails to provide information addressing the solubility of the wastes stored in the tanks with the water used to decontaminate the tank system. Please provide information which indicates that water is the proper material for decontaminating the tanks. If water is not appropriate, revise the closure plan to include a solution which is appropriate to decontaminate the tank system. This information must be provided in accordance with OAC 3745-66-12(B)(4).
5. Section 2.3.1.3 Secondary Containment Structure- This section fails to provide information addressing the estimated volume of water that will be used to decontaminate the secondary containment structure. This information must be provided in accordance with OAC 3745-66-12(B)(4).

6. Section 2.3.1.2 Ancillary Equipment- This section fails to provide detailed information regarding the decontamination of the ancillary equipment. Please provide a drawing indicating the location of the decontamination area. Revise this section to address visual inspection of the equipment after it has been rinsed to ensure that any gross contamination has been removed. Also revise part 2 of this section to indicate that the ancillary equipment will be handled as a hazardous waste until it can be demonstrated that it does not meet the definition of hazardous waste. This information must be provided in accordance with OAC 3745-66-12(B)(4).

In Section 2.3.1.1 the plan indicates that flash point and BTEX will be used to determine if the decontamination of the tanks is successful. However, for the ancillary equipment, TCLP benzene and flashpoint will be used. Please explain the discrepancy between the criteria used to determine if the ancillary equipment has been decontaminated verses the tanks.

7. Section 3.3 Milestone Chart- This section fails to show a detailed schedule for the closure activities. Major activities should be listed separately and estimated time-frames for start-up and completion of each activity should be provided. This information must be provided in accordance with OAC 3745-66-12(B)(4).
8. Section 1.5.3 Secondary Containment- This section indicates that no cracks are evident in the secondary containment area. Please provide photographs that show the condition of the secondary containment area. This information must be provided in accordance with OAC 3745-66-12.