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HAMILTON COUNTY TSD-LQG (LETTER CONCERNING HWMU #7 & #8)

04/13/95

OEPA
2
LETTER

DOE-FN



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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FERNALD

LOG I-2123

APR 17 10 26 AM '95

FILE: _____

George V. Voinovich
Governor

April 13, 1995

RE: U.S. DOE-FEMP
HAZARDOUS WASTE
OH6 890 008 976
HAMILTON COUNTY
TSD-LQG

Mr. Walter J. Quaider, Acting Associate Director,
U.S. Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Quaider:

By letter dated May 2, 1994, to Mr. Paul Pardi, OEPA Division of Hazardous Waste, you requested agency concurrence with the Department of Energy Fernald Environmental Management Project (DOE-FEMP) proposal to withdraw previous transmittals of Closure Plan Information and Data pertaining to Hazardous Waste Management Unit #7 (Drummed Hydrofluoric Residue/Associated Storage Area Northwest of Plant 4), and based upon information and documentation presented within the letter and attachments, declare HWMUs #7 and #8 as clean closed.

Documentation supporting the DOE-FEMP proposal has been reviewed by this office. OEPA does agree in principal that HWMUs #7 and #8 can be considered as closed RCRA units, with no action necessary in terms of "closure activities". To this end OEPA makes the following recommendations:

1. Regarding HWMU #7; DOE-FEMP initially submitted a closure plan, and OEPA subsequently issued an NOD for this unit. Withdrawal of the plan may not be an administrative option at this point. As an alternative, OEPA suggests DOE-FEMP respond to the NOD with an amended plan that duplicates the documentation DOE-FEMP has presented. Following agency public notice procedures, OEPA would approve the amended plan. DOE-FEMP's closure certification would be a simple formality stating the unit was closed in accordance with closure plan information.
2. Regarding HWMU #8; Since no closure plan has been submitted, OEPA agrees that DOE-FEMP may declare this unit closed under "generator closure" protocol, with no formal plan required.

(SAHIER(J)
ACTION RESPONSE

TO R-1464 1

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Mr. Walter Quaider, U.S. DOE-FEMP
April 13, 1995
page 2

Please contact me at (513) 285-6090, or Paul Pardi at (513) 285-6357 if you have questions or comments regarding these closures.

Sincerely,



Phillip C. Harris
Division of Hazardous Waste Management

/pch

cc: Bob Danner, U.S. DOE-FEMP