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**CLOSURE CERTIFICATION REPORT FOR HAZARDOUS WASTE
MANAGEMENT UNIT NO. 13 - WHEELABRATOR DUST COLLECTOR**

03/07/96

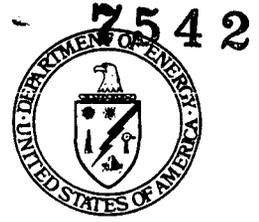
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CLOSURE CERT



Department of Energy

**Ohio Field Office
Fernald Area Office**

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



MAR 07 1996
DOE-0609-96

**Mr. Donald Schregardus, Director
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, OH 43266-1049**

Dear Mr. Schregardus:

**CLOSURE CERTIFICATION REPORT FOR HAZARDOUS WASTE MANAGEMENT UNIT NO.
13 - WHEELABRATOR DUST COLLECTOR**

Enclosed is the Closure Certification Report for Hazardous Waste Management Unit No. 13, Wheelabrator Dust Collector. This Certification Report is submitted as the final requirement of the August 16, 1995, Ohio Environmental Protection Agency (OEPA) approved Closure Plan Information and Data (CPID) package.

Certification is being provided that closure was completed in accordance with the approved CPID and that the Wheelabrator Dust Collector and ancillary equipment meet closure standards.

If you have any questions, please contact Robert Danner at (513) 648-3167.

Sincerely,

for Jack R. Craig
Director

FN:Danner

Enclosure: As Stated

000001

cc w/enc:

**R. Nace, EM-425, CL
G. Jablonowski, USEPA-V, SRF-5J
J. Saric, USEPA-V, SRF-5J
Manager, TPSS/DERR, OEPA-Columbus
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FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

**Hazardous Waste Management Unit No. 13
Wheelabrator Dust Collector
Closure Certification Report**

February 1996

U.S. DEPARTMENT OF ENERGY

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ATTACHMENT

EPA Correspondence

ACRONYMS AND ABBREVIATIONS

ACA	Amended Consent Agreement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cf	cubic feet
CFR	Code of Federal Regulations
CPID	Closure Plan Information and Data
DOE	Department of Energy
FEMP	Fernald Environmental Management Project
FMPC	Feed Materials Production Center
HEPA	High Efficiency Particulate Air
HWMU	Hazardous Waste Management Unit
ICP	Inductively Coupled Plasma
MCL	maximum contaminant level
MCLG	maximum contaminant level goal
MEF	Material Evaluation Form
mg/L	milligrams per liter
NTS	Nevada Test Site
OAC	Ohio Administrative Code
OEPA	Ohio Environmental Protection Agency
PPE	personal protective equipment
PQL	practical quantitation limit
RCRA	Resource Conservation and Recovery Act
WDC	Wheelabrator Dust Collector
WMB	white metal box
WWTS	Wastewater Treatment System

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ES.1 EXECUTIVE SUMMARY

This closure certification report summarizes the activities conducted to accomplish clean closure of the Wheelabrator Dust Collector (WDC) in accordance with the approved Closure Plan Information and Data (CPID) package.

The WDC functioned as a part of the drum reconditioning operation by collecting shotblast residue generated by the Wheelabrator Shotblaster located in Building 66. The shotblaster removed paint from old, empty drums by abrasive blasting with steel shot. A Hoffman Dust Collector, a smaller unit that worked in conjunction with the WDC, was used for small cleanups from other sources inside Building 66 and for fine particulate removal from the WDC.

Lead (D008) was the only contaminant of concern for the WDC. The cleanup action level established for the WDC closure was 0.60 mg/L lead in the equipment decontamination rinseates. Results of the decontamination rinseate analyses indicate the action level was achieved.

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1.0 INTRODUCTION

The Fernald Environmental Management Project (FEMP) is a U.S. Department of Energy (DOE) owned facility located near Fernald, in Hamilton and Butler Counties, Ohio (Figure 1-1). The FEMP, formerly known as the Feed Materials Production Center (FMPC), produced uranium fuel elements, target cores, and other uranium compounds for use at DOE facilities in support of the U.S. Defense program. The FEMP facility was in operation at this site from approximately 1950 until 1989.

1.1 Purpose

This certification report summarizes the activities conducted to accomplish the clean closure of the Wheelabrator Dust Collector (hereafter called WDC), in accordance with the approved Closure Plan Information and Data (CPID) package. Decontamination of the WDC was confirmed, and clean closure has been achieved. Analytical results of the final rinsewater samples from the unit and ancillary equipment met the closure rinsewater standards as specified in the September 1993, Interim Final, Closure Plan Review Guidance for RCRA Facilities (hereafter called OEPA Closure Guidance).

1.2 Background

On July 19, 1994, the U.S. Department of Energy-Fernald (DOE-FN) submitted the CPID to the Ohio Environmental Protection Agency (OEPA). On March 3, 1995, DOE-FN met with the Ohio Environmental Protection Agency (OEPA) and subsequent to this meeting, resubmitted the CPID on July 26, 1995. The CPID was approved by OEPA on August 16, 1995 (Attachment 1).

1.3 Unit Description

The WDC functioned as a part of the Drum Reconditioning Operation by collecting shotblast residue generated by the Wheelabrator Shotblaster located in Building 66. The shotblaster removed paint from old, empty drums by abrasive blasting with steel shot. The WDC steel baghouse is 8'4" (H) x 9'6" (D) x 18' (W) and is supported by six angle steel legs, 9'10" tall.



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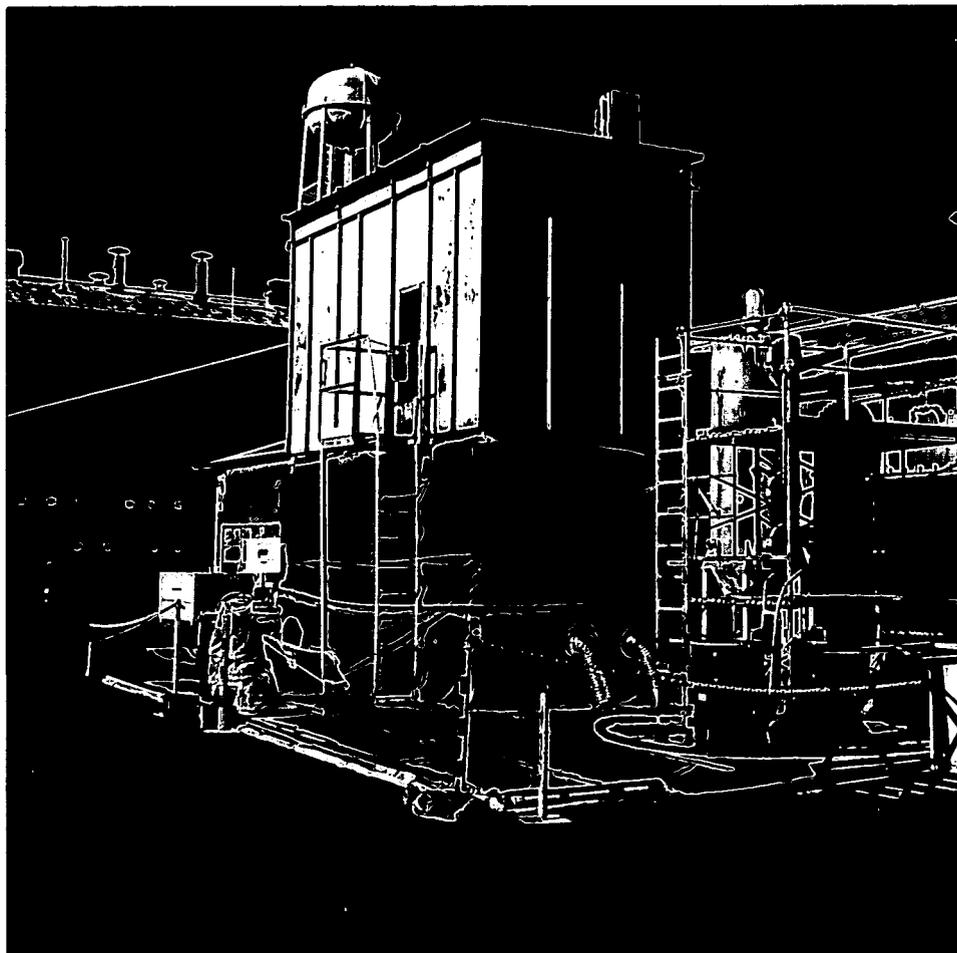
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The baghouse is divided into two equal sections by a center wall and each section has an access door. The entire unit stands 18'2" in height. Each access door has an attached platform and ladder. Directly beneath the baghouse are two inverted pyramid-shaped dust hoppers with rotary valves at each dust hopper outlet.

A Hoffman Dust Collector, a smaller unit that worked in conjunction with the WDC, was used for small cleanups from other sources inside Building 66 and for fine particulate removal from the WDC (Photograph 1). The Hoffman Dust Collector is a vertical, cylindrical steel baghouse with a cone shaped bottom or dust hopper. The unit is supported by four steel legs, 4'6" tall. The entire Hoffman unit stands 13' tall.

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Photograph 1 - The Wheelabrator and Hoffman Dust Collectors



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2.0 SUMMARY OF CLOSURE ACTIVITIES

Closure activities for the WDC met the following performance standards (based on OAC 3745-66-11 (40 CFR 265.111)) as stated in the CPID:

- Minimize the need for post-closure maintenance associated with the WDC by removing all hazardous wastes from the unit and demonstrating through sampling and analysis of decontamination rinseates that any remaining internal contamination is below the action levels (see Section 2.1 for Cleanup Action Levels).
- Control, minimize, or eliminate the escape of hazardous waste, hazardous waste constituents, contaminated rainfall, or waste decomposition products to the ground, to surface waters, or to the atmosphere.
- Conduct and document closure actions in accordance with the approved CPID.

2.1 Cleanup Action Levels

Lead (D008) was the only contaminant of concern for the WDC. The cleanup action level established for the WDC closure was 0.60 mg/L lead in the equipment decontamination rinseates. This level was specified in the OEPA Closure Guidance, which states that, for clean closure, hazardous waste residue should be removed to the maximum extent practicable and the following rinseate standards must be met:

- (1) Fifteen times the public drinking water maximum contaminant level (MCL) for hazardous constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics;
- (2) If an MCL is not available for a particular contaminant, then fifteen times the maximum contaminant level goal (MCLG) as promulgated in 40 CFR 141.50 shall be used as the clean standard. If the MCLG is zero, use fifteen times the contaminant's practical quantitation limit (PQL) in ground water; or,

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- (3) If the product of fifteen times the MCL or MCLG exceeds 1 mg/l or if neither an MCL nor an MCLG is available for a particular contaminant, 1 mg/l shall be used as the clean standard.

The presence of lead in the equipment rinseates was used to indicate the presence of hazardous waste residues. In accordance with OAC (1993-2 edition) 3745-81-11, the MCL for lead was removed from the inorganic chemical list effective September 13, 1993. In addition, the MCLG for lead is zero (40 CFR 141.51). Therefore, the cleanup action level for the rinseates is the product of 15 times the Practical Quantitation Limit (PQL) for lead in groundwater (i.e., 0.04 mg/L), which equals 0.60 mg/L. The PQL for lead in groundwater is provided at 40 CFR 264, Appendix IX, Method 6010, "Inductively Coupled Plasma [ICP] Atomic Emission Spectroscopy." Method 6010 is the most commonly used method because it is applicable to a large number of metals and wastes. The results of the decontamination rinseate analyses are provided in Table 2-1.

Table 2-1 Analytical Results of Verification Rinses (lead, mg/L)

Release	Sample No.	Location	Result (mg/L)	Regulatory levels (mg/L)
7559	200165744	Ductwork between WDC and Hoffman DC	0.092	0.60
7559	200165750	Ductwork between WDC and Building 66	0.342	0.60
8311	200165753	Squirrel cage blower, grating, and rotary valves	0.523	0.60
8042	200165763	WDC baghouse, shaker assembly	<0.205	0.60
8105	200165759	Hoffman Dust Collector baghouse	<0.205	0.60
8105	200165769	WDC north hopper	0.310	0.60
8105	200165772	WDC south hopper	0.250	0.60

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2.2 Field Changes

To accomplish clean closure of the WDC, minor field changes were implemented. The changes involved removing grating above the WDC hoppers and removing the rotary valves at the bottom of the hoppers, which facilitated removal of the residue (see Section 2.3.1). Telephone notification was provided to OEPA of these field changes; it was agreed that these should be documented in this report.

2.3 Closure Methodology

The FEMP objective was to clean close the WDC in accordance with OEPA Closure Guidance and applicable regulations. A CPID for this unit was submitted and closure activities performed in accordance with the approved CPID. The RCRA closure for the WDC was managed and implemented in conjunction with existing CERCLA removal and response actions. These CERCLA actions are required by the Amended Consent Agreement (ACA). The specific CERCLA actions are as follows:

- Removal Action No. 7, "Continuing Release of the Plant 1 Pad"
- Removal Action No. 9, "Removal of Waste Inventories"
- Removal Action No. 12, "Safe Shutdown"
- OU3 Interim Record of Decision (IROD)

The WDC closure actions achieved the clean closure performance standards prescribed by OAC 3745-66-11 (40 CFR 265.111). The WDC was decontaminated, but not dismantled, during closure.

2.3.1 Sequence of Events

This Closure Certification Report documents that activities to clean close the WDC met the RCRA requirements of the CPID. Closure activities and their completion dates are listed below:

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- 01/31/95 Wheelabrator and Hoffman dustubes were sampled for waste characterization. (Sample Plan WBS 04.96)
- 07/10/95 Ductwork was removed and placed it in two white metal boxes.
- 07/11/95 Operators remove dustubes from WDC baghouse. Begin vacuuming residue from hoppers.
- 07/13/95 Tried to remove hopper residue through rotary valves, but the residue did not "flow." The ductwork was decontaminated using pressurized water. Characterization and decontamination verification rinseate samples were collected from both the duct running between the dust collectors and the duct from the WDC to the building.
- 07/20/95 Began removing residue by chipping and vacuuming - residue is wet and hardened.
- 08/03/95 Residue in the hoppers had hardened and was very difficult to vacuum out, due to years of moisture in the dust. To facilitate residue removal, rotary valves at the bottom of the hoppers were removed and placed in a white metal box (WMB).
- 08/09/95 Wipe down baghouse interiors with Maseline™ cloth rags. Rags were collected and sampled for waste disposition.
- 08/10/95 Laid Herculite™ plastic sheeting on baghouse floor to catch verification rinse water.
- 08/15-17/95 Rinsed inside of both baghouses. Water collected and a composite verification rinseate sample taken.
- 08/22/95 Operators try to remove residue from hoppers, but holes in grates over hoppers are too small. Grates are cut out with an acetylene torch. The grating was

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placed in the WMB with the rotary valves. Removing the rotary valves and grating were deviations from the approved CPID.

Glove bags in 55-gallon drums were taped over the bottom of the hoppers to catch the residue as it was scraped out from above.

Removed dustubes from Hoffman Dust Collector and removed squirrel cage blower, which was placed in the WMB with the rotary valves and the grating.

- 08/23/95 Completed rinsing the north and south hoppers of the WDC.
- 08/24/95 Characterization and decontamination verification rinseate samples were collected from both the Wheelabrator and the Hoffman Dust Collector hoppers.
- 09/06/95 Decontaminated squirrel cage blower, grating, and rotary valves at Building 69 pad. Decontamination verification rinseate samples were collected from these materials.

2.3.2 Unit Preparation

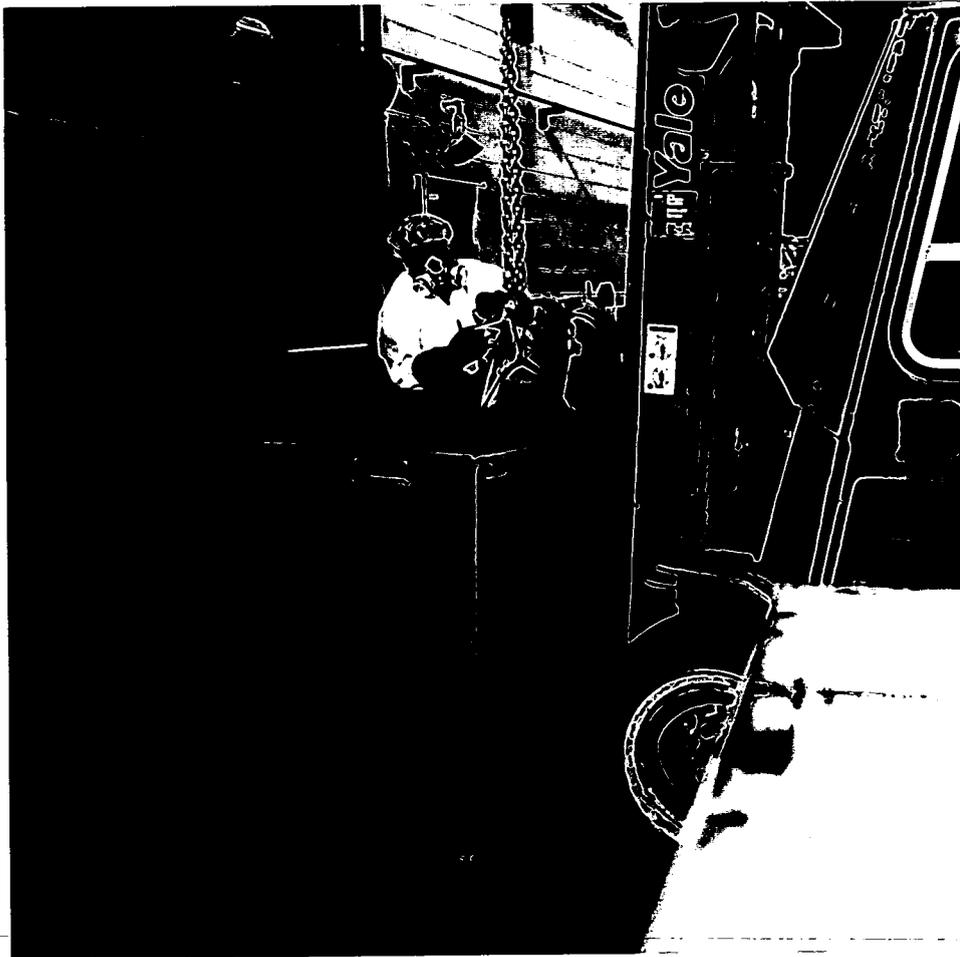
A Herculite™ plastic sheeting tent was constructed around the structural support members of the WDC. A high efficiency particulate air (HEPA) filtration unit was installed to create a negative pressure environment inside the Herculite™ tent to prevent any release of any airborne residue from the WDC. A Herculite™ diked trough was constructed to encompass the entire concrete work area to contain any liquid that might spill.

2.3.3 Ductwork

The interconnecting ductwork between the WDC and the Hoffman Dust Collector was disconnected and rinsed to remove shotblast residue (Photograph 2). The rinseates were collected and sampled to verify decontamination of the ductwork (Table 2-1). The metal duct was placed in low-level waste storage pending disposition to the Nevada Test Site (NTS). The ductwork openings were sealed per the CPID.

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Photograph 2 - Decontamination of Ductwork



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2.3.4 Dustubes

The cloth dustubes inside the baghouse were disconnected from the top hangers and the bottom dustube connections. As each dustube was removed it was placed in plastic bags and taken from the baghouse. A Material Evaluation Form (MEF) was completed for the dustubes and they were determined to be nonRCRA. The bagged dustubes were placed into approved storage containers and placed in low-level waste storage pending disposition to NTS.

2.3.5 Squirrel Cage Blower, Grating, and Rotary Valves

The squirrel cage blower assembly, metal grating, and rotary valves were removed from the WDC and rinsed for decontamination at the Building 69 pad. The rinseates were collected and sampled to verify decontamination (Table 2-1).

2.3.6 Wheelabrator Baghouse and Metal Shaker Assembly

The Wheelabrator baghouse and metal shaker assembly that held the dustubes were wiped down with cloth rags. A composite verification rinse water sample was taken to verify decontamination (Table 2-1).

2.3.7 Wheelabrator Hoppers and Hoffman Dust Collector

The WDC north and south hoppers were pressure rinsed. Water was directed to all internal surfaces of the hoppers. The rinseates were collected and sampled for characterization and to verify decontamination (Table 2-1).

The Hoffman Dust Collector baghouse and hopper were decontaminated by removing the dustubes and vacuuming all visible contamination. Following vacuuming, the unit was further decontaminated using pressurized water. The entire Hoffman unit was rinsed by spraying from the top access point. The rinseates were collected and sampled to verify decontamination (Table 2-1).

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2.4 Waste Management

Wastes generated during the closure of the WDC consisted of both liquids and solids. Liquid wastes were generated as a result of the decontamination rinses on the various pieces of equipment. Solids were generated from vacuuming residues from equipment surfaces, removing dustubes from the baghouses, decontamination wipe downs, and personal protective equipment (PPE). Table 2-2 provides a summary of WDC wastes.

2.4.1 Decontamination Rinseates

Decontamination rinseates were generated from rinsing the ducts and internal surfaces of the Wheelabrator and Hoffman Dust Collectors. These rinseates were collected and containerized. Samples of the containerized rinseates were collected for waste characterization. Upon examination of the data, the rinseates will be evaluated for discharge through the FEMP Wastewater Treatment System (WWTS). Approximately 50 gallons of rinseates were generated.

2.4.2 Solid Residues

Solid residues removed during the closure of the Wheelabrator and Hoffman Dust Collectors consisted of dustubes removed from the baghouse, shotblast residues vacuumed from the interior surfaces of the equipment, and PPE. These materials were containerized and characterized for waste disposition. The cloths used to wipe down the interior of the WDC baghouse were used up as sample material. The solid residues were placed in low-level waste storage pending disposition.

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Table 2-2 Waste Volumes Generated During WDC Closure*

Material	Volume	Contaminants	Disposition
Dustubes	16 cf	Radiological	Storage on-site pending disposition to NTS.
Rinseates	7.5 cf	Radiological	Discharged to the WWTS.
Dust Collector Residues	112 cf	Radiological, Lead	Storage on-site pending treatment
Ductwork, Squirrel Cage Blower, Grating and Rotary Valves	218 cf	Radiological	Storage on-site pending disposition to NTS.
PPE and Herculite™	56 cf	Radiological	Bailed. Storage on-site pending disposition to NTS.

* After decontamination and verification rinseate sampling.

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3.0 CONCLUSIONS

The objectives of the WDC closure implementation were to:

- Minimize the need for post-closure maintenance associated with the WDC by removing all hazardous wastes from the unit and demonstrating through sampling and analysis of decontamination rinseates that any remaining internal contamination is below the action levels (Section 2.1, Cleanup Action Levels).
- Control, minimize, or eliminate the escape of hazardous waste, hazardous waste constituents, contaminated rainfall, or waste decomposition products to the ground, to surface waters, or to the atmosphere.
- Conduct and document closure actions in accordance with the approved CPID.

These objectives have been met as is demonstrated by the analytical results of equipment decontamination rinse samples (Table 2-1) and documentation of the closure activities as provided in this report.

The rinse waters and other waste generated from closure of the WDC, with the exception of the dust collector residues, have been characterized as low-level radiological wastes. They do not contain RCRA-listed hazardous components or exhibit a RCRA characteristic.

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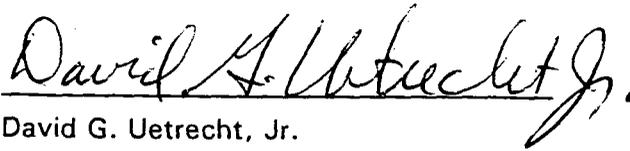
4.0 CERTIFICATION STATEMENTS

The following pages are the DOE closure certification statements (following the format in OAC 3745-50-42[D]) and a Professional Engineer's certification statement documenting that HWMU No. 13, Wheelabrator Dust Collector, was closed in accordance with the approved CPID, as required under OAC 3745-66-15.

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INDEPENDENT ENGINEER'S CERTIFICATION STATEMENT

Based on observations in the field and information provided to me, I hereby certify that the Wheelabrator Dust Collector, Hazardous Waste Management Unit No. 13, at the Department of Energy (DOE) Fernald Environmental Management Project (FEMP) has been closed in accordance with the specifications in the August 16, 1995, OEPA-approved Closure Plan Information and Data (CPID) package. Deviations are documented and discussed in the Certification Report. Closure activities were initiated and completed based on the approved CPID. Copies of correspondence concerning this matter are included in Attachment 1.



David G. Uetrecht, Jr.

Ohio Registration No. E-47837

ADENA Utilities Engineering, Inc.



HWMU No. 13
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CERTIFICATION OF OWNER AND OPERATOR

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Glenn Mujica
U.S. Department of Energy, Fernald Area Office
Owner and Operator

3-5-96
Date Signed

HWMU No. 13
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CERTIFICATION OF CO-OPERATOR

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Robert P. Hill

Fernald Environmental Restoration
Management Corporation, Co-Operator

2-29-96

Date Signed

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ATTACHMENT 1 - EPA CORRESPONDENCE



State of Ohio Environmental Protection Agency

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

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Mike

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George V. Voinovic
Governor

Donald R. Schregardt
Director

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

August 16, 1995

RE: CLOSURE PLAN APPROVAL
U.S. DOE-FEMP
OH6890008976

Mr. Jack R. Craig
Director
U.S. DOE-FEMP
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

On July 19, 1994, U.S. Department of Energy - Fernald Environmental Management Project (DOE-FEMP) submitted to Ohio EPA a closure plan for Hazardous Waste Management Unit #13 (Wheelabrator Dust Collector), an unpermitted storage unit located at 7400 Willey Road, Fernald, Ohio. Subsequent to meeting with Ohio EPA on March 3, 1995 DOE-FEMP resubmitted the closure plan on July 26, 1995. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that DOE-FEMP'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 of DOE-FEMP in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of DOE-FEMP's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at 7400 Willey Road, Fernald, Ohio meets the performance standard contained in OAC 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

(Signature)
action

response

to be 10/15

(8974)

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Gavin Date 8-16-95

OHIO EPA

AUG 16 95

DEPUTY DIRECTOR'S JOURNAL

Mr. J.R.Craig
DOE-FEMP
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The closure plan submitted to Ohio EPA on July 19, 1994, and subsequent revision dated July 26, 1995 by DOE-FEMP is hereby approved.

Please be advised that approval of this closure plan does not release DOE-FEMP from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective actions for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages; to undertake any removal, remedial, and/or response action relating to the facility; and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carvin Date 8-16-95

OHIO EPA.

AUG 16 95

RECORDED DIRECTOR'S JOURNAL

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Mr. J.R. Hamric
DOE-FEMP
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served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42(D), and 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.

Sincerely,



Donald R. Schregardus
Director

cc: Tom Crepeau, OEPA, DHWM Central File
Montee Suleiman, OEPA, DHWM, CO
Harriet Croke, Ohio Permit Section, USEPA, Region V
Chris Budich, OEPA, Southwest District Office
Bob Danner, DOE-FEMP

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Carver Date 8-16-95

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