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DOE-FEMP HAZARDOUS WASTE OH6 890 008 976 HAMILTON CO
TSDF/LQG

07/02/96

OEPA DOE-FN
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COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

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Dayton, Ohio 45402-2911
(513) 285-6357
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George V. Voinovich
Governor

July 2, 1996

RE: DOE-FEMP
HAZARDOUS WASTE
OH6 890 008 976
HAMILTON CO
TSDF/LQG

Mr. Jack Craig, Director
Department of Energy
Fernald Environmental Management Project
P.O. Box 538705
Cincinnati, Ohio 45253-8705

- Reference: 1) Letter dated 5/2/94; Walter Quaider, DOE, to Paul Pardi, OEPA.
2) Letter dated 4/13/95; Phillip Harris, OEPA to Walter Quaider, DOE.

Dear Mr. Craig:

This letter will notify the Department of Energy Fernald Environmental Management Project (DOE-FEMP) of Ohio EPA's agreement regarding a unit status change for Hazardous Waste Management Unit No. 7 (Drummed Hydrofluoric Residue/Associated Storage Area Northwest of Plant 4).

DOE-FEMP initially submitted a closure plan for HWMU No.7 on 11/19/92. In response to the agency's Notice of Deficiency, a revised plan was submitted on 6/28/93. DOE-FEMP subsequently requested that HWMU's No. 7 and No. 8, be viewed as subject to "generator closure" requirements (a formal closure plan for HWMU No. 8 was never submitted to the agency). Ohio EPA's Division of Hazardous Waste Management inspected the unit(s) and concurred with the justification and proposal provided by DOE-FEMP. Since a formal closure plan had been submitted and public noticed, the closure plan for HWMU No. 7 remained on the agency's active closure data base.

Ohio EPA has now removed this closure plan from the data base. Ohio EPA agrees that HWMU No. 7 and No. 8 are not subject to the formal closure process. These units are however, subject to generator closure requirements as outlined in OAC 3745-52-34(A)(1). In a letter to DOE-FEMP dated April 13, 1995, (P. Harris to W. Quaider) the agency agreed that these units can be considered as clean closed.

Mr. Jack Craig
July 2, 1996
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Should you have questions concerning this matter, please do not hesitate to contact me at (513) 285-6090.

Sincerely,



Phillip C. Harris
Division of Hazardous Waste Management

cc: Terry Hagen, FERMCO
Montee Suleiman, DHWM CO