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2411

JUL 27 1999

Mr. Paul Pardi, Hazardous Waste Group Leader
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0974-99

Dear Mr. Pardi:

SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996

Reference: Letter and Director's Final Findings and Orders, T.E. Crepeau to P. Hamric and J. Bradburne, dated June 6, 1996

Enclosed is a Cross-Reference Index of Hazardous Waste Management Unit (HWMU) closure components and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents for those HWMUs identified in Attachment A of the Director's Final Findings and Orders (DF&O), in accordance with Section V, Order #2, of the referenced DF&O. The Index links specific components of the Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for Resource Conservation and Recovery Act (RCRA) Facilities related to substantive closure requirements, with the appropriate CERCLA document that addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents that have already been submitted.

The submittal of this Cross-Reference Index meets the requirements in Section V to provide this document following the submittal of a specific CERCLA document identified in the Cross-Reference Index. The Final Plant 6/East Warehouse Complex Implementation Plan was submitted to the U. S. Environmental Protection Agency (U.S. EPA) and OEPA on July 22, 1999. The specific reference to this document in the Cross-Reference table has been highlighted.

Mr. Paul Pardi

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If you have any questions regarding this matter, please contact Shannon Kaster at (513) 648-3157.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Kaster

Enclosure

cc w/enclosure:

S. Kaster, OH/FEMP

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AR Coordinator, FDF/78

CROSS-REFERENCE INDEX FOR FEMP HWMU CLOSURE PLAN COMPONENTS UNDER CERCLA

CLOSURE PLAN COMPONENT	CERCLA DOCUMENT	CROSS REFERENCE INDEX
<p>1. Description/Detailed Drawing of Waste Management Unit(s) to be Closed (Closure Guidance Item 3.2 and 3.4)</p>	<p>OU1 FINAL Remedial Investigation Report, August 1994</p>	<p>Waste Pit 4 (27): Description, pp. 1-23 to 1-24; History, pp. 1-35 to 1-36; Drawings, pp. 1-83, 1-88 Waste Pit 5 (42): Description, pp. 1-24 to 1-27; History, pp. 1-36 to 1-37; Drawings, pp. 1-83, 1-89</p>
	<p>OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997</p>	<p>HWMU Component Number and Associated D&D Complex: Table 3-10, p. 3-71 D&D Complex Locations: Figure 2-2, p. 2-17</p>
	<p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996 FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997 FINAL Misc. Small Structures Implementation Plan, October 1998 FINAL Implementation Document for HWMUs #28 and 50, December 1998 FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999</p>	<p>Drawing of HWMU: To be Submitted for Each D&D Complex Plant 1 Storage Bldg. - Bldg. 67 (25): Figure D-11 Plant 9 Warehouse - Bldg. 81 (35): Figure D-10, D-11 Waste Oil Decant Shelter (component of Trane Incinerator) (28): No drawing available for this unit KC-2 Warehouse - Bldg. 63 (34): Figure D-22, D-23 UNH Tanks - NFS Storage Area (46): Figure D-1 Trane Incinerator (28): Attachment 1 UNH Tanks - Raffinate Bldg. (50): Attachment 2 Plant 6 Warehouse - Bldg. 79 (37): Appendix D</p>

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<p>1. Description/Detailed Drawing of Waste Management Unit(s) to be Closed (Closure Guidance Item 3.2 and 3.4) - Continued</p>	<p>OU5 FINAL Remedial Investigation Report, March 1995</p>	<p>General Location Map of HWMUs to be Closed Under CERCLA: Figure 4-112 Size and Dimensions of HWMUs: Table 1-12 FEMP Topographic Map: Figure 3-1 General HWMU Information and Locations Within OU5 Areas, Appendix D: Plant 1 Storage Pad (20): Plant 1 Area, Section D.2.1, p. D.2-2 UNH Tanks (46-50), NAR System (10), Trane Incinerator (28): Plant 2/3 Area, Section D.2.2, p. D.2-19 Storage Pad N of Plant 6 (36): Plant 6 Area, Section D.2.4, p. D.2-28 Plant 8 East and West Drum Storage Pads (17, 18), Box Furnace (14), Oxidation Furnace #1 (15): Plant 8 Area, Section D.2.5, p. D.2-33 Sludge Drying Beds (41): Sewage Treatment Plant Area, Section D.2.7, p. D.2-41 Abandoned Sump West of Pilot Plant (22), Tank T-2 (54): Pilot Plant Area, Section D.2.8, p. D.2-45 Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area S of W-26 (5): Laboratory Area, Section D.2.9, p. D.2-51 Tank Farm Sump (11): Tank Farm and Boiler House Area, Section D.2.13, p. D.2-69 Fire Training Facility (1): Fire Training Area, Section D.2.18, p. D.2-86</p>
<p>2. List of Hazardous Waste(s) Managed in Unit(s) (Closure Guidance Item 3.5)</p>	<p>OU1 FINAL Remedial Investigation Report, August 1994</p>	<p>Waste Managed in Unit: Waste Pit 4 (27): pp. 4-60 to 4-70, pp. 1-35 to 1-36 Waste Pit 5 (42): pp. 4-70 to 4-77, pp. 1-36 to 1-37</p>
	<p>OU3 FINAL Remedial Investigation/Feasibility Study Report</p>	<p>Waste Managed in HWMU: Table K-1</p>
	<p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996</p>	<p>Waste Managed in HWMU: To be Submitted for Each D&D Complex Plant 1 Storage Bldg. - Bldg. 67 (25): Section 3.7, p. 42</p>

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2. List of Hazardous Waste(s) Managed in Unit(s) (Closure Guidance Item 3.5) - Continued	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse - Bldg. 81 (35) Section 3.13, pp. 39 to 40
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, p. 36
	FINAL Implementation Document for HWMUs #28 and 50, December 1998	KC-2 Warehouse - Bldg. 63 (34) Section 3.23, pp. 41 to 43
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	UNH Tanks - NFS Storage Area (46): Section 3.1, p. 23
		Trane Incinerator (28): HWMU Decontamination
	UNH Tanks - Raffinate Bldg. (50): HWMU Decontamination	Plant 6 Warehouse - Bldg. 79 (37): Section 3.9, p. 37
OU5 FINAL Remedial Investigation Report, March 1995	HWMUs with Potential Soil Contamination: Tables 4-68 and 4-69	
OU5 FINAL Feasibility Study Report, June 1995	HWMU Constituents of Concern (COCs) for Soil: Tables 4.4, 4.5 and 4.6	
OU5 FINAL Sitewide Excavation Plan, July 1998	HWMU COCs: Table 2-1	
OU5 Integrated Remedial Design Packages for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, April 1999	HWMU COCs: To be Submitted	
	Sludge Drying Beds (41): Section 3.0, Disposition of Sludge Cake and Associated Debris, p. 3-1	
3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6)	OU1 FINAL Remedial Design Documents Package, August 1998	Removal of Waste - Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	General Methods for Removing and Storing Waste: HWMU Decontamination, Section 3.2.3, p. 3-13; Materials Management, Section 3.3, pp. 3-30 to 3-63; HWMU Remediation (use of Safe Shutdown, D&D of complexes), Section 3.5.3, pp. 3-69 to 3-73
3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6) - Continued	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Removing Waste from HWMU Storage, Treatment, and Disposition of Waste: To be Submitted for Each D&D Complex

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	<p>FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996 FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997 FINAL Misc. Small Structures Implementation Plan, October 1998 FINAL Implementation Document for HWMUs #28 and 50, December 1998 FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999</p>	<p>Plant 1 Storage Bldg. - Bldg. 67 (25): Section 3.7, p. 42 Plant 9 Warehouse - Bldg. 81 (35): Section 3.13, pp. 39 to 40 Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37 KC-2 Warehouse - Bldg. 63 (34): Section 3.23, p. 42 UNH Tanks - NFS Storage Area (46): Section 3.1, pp. 23 to 24 Trane Incinerator (28): Remedial Tasks UNH Tanks - Raffinate Bldg. (50): Remedial Tasks, HWMU Decontamination Plant 6 Warehouse - Bldg. 79 (37): Section 3.9, p. 37</p>
	<p>OUS FINAL Sitewide Excavation Plan, July 1998</p>	<p>Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F.3 to F.5, Implementation of Construction; Appendix I, Sitewide Excavation of Contamination by Constituent</p>
	<p>OUS Integrated Remedial Design Packages for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, April 1999</p>	<p>Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: To be Submitted Sludge Drying Beds (41): Removal of Sludge: Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Excavation of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4</p>
<p>4. Schedule for Closure (Closure Guidance Item 3.7)</p>	<p>OU1 FINAL Remedial Action Work Plan, January 1997</p>	<p>Schedule Summary for Remedial Design/Remedial Action Packages; Closure of Waste Pit 4 (27), Waste Pit 5 (42): Table 2-1, p. 2-16</p>

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	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	Accelerated Schedule for Conducting Safe Shutdown Activities at D&D Complexes: Figure 6-1, p. 6-3 Schedule for Submitting D&D Packages: Table 6-1, p. 6-7
	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996 FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997 FINAL Misc. Small Structures Implementation Plan, October 1998 FINAL Implementation Document for HWMUs #28 and 50, December 1998 FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Schedule for Removing & Decontaminating Above-Grade Unit Structures and Equipment: To be Submitted for Each D&D Complex Plant 1 Storage Bldg. - Bldg. 67 (25): Figure 4-1, p. 48 Plant 9 Warehouse - Bldg. 81 (35) Figure 4-1, p. 43 Waste Oil Decant Shelter (component of Trane Incinerator) (28); KC-2 Warehouse - Bldg. 63 (34); UNH Tanks - NFS Storage Area (46): Section 4.0, pp. 45 to 46 Trane Incinerator (28); UNH Tanks - Raffinate Bldg. (50): Letter, J. Reising to G. Jablonowski and T. Schneider, "Transmittal of RCRA/CERCLA Integrated Closure Implementation Document for the Trane Incinerator (HWMU No. 28) and UNH Tanks, Hot Raffinate Building (HWMU No. 50)," dated December 22, 1998. Plant 6 Warehouse - Bldg. 79 (37): Figure 4-1, p. 42
	OUS FINAL Remedial Design Work Plan, August 1996	Schedule for Submitting Remedial Design Documents for Soil: Table 4-1, p. 4-6
	OU5 FINAL Site-wide Excavation Plan, July 1998	Schedule for Submitting Remedial Design Documents: Table 1-5
4. Schedule for Closure (Closure Guidance Item 3.7) - Continued	OU5 Integrated Remedial Design Packages for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, April 1999	Area/Project-Specific Schedules: To be Submitted Sludge Drying Beds (41) - Sector 3D: Table 7-3
5. Health and Safety Issues (Closure Guidance Item 3.9)	OU1 FINAL Remedial Action Documents Package, April 1999	Health and Safety Plan
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	Health and Safety Plan: Appendix E

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	OU5 FINAL Sitewide Excavation Plan, July 1998	Health and Safety Plan: Section 6.0, Project Health and Safety; Table 6-1, Occupational Monitoring and Action Levels
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas Area 1, Phase II Integrated Remedial Design Package, September 1998	Area/Phase-Specific Health and Safety Requirements: To be Submitted Sludge Drying Beds (41): Section 3.0, Project Specific Health and Safety
6. Decontamination Efforts (Closure Guidance Item 3.10)	OU1 OU1 Complex D&D Implementation Plan	Decontamination of Equipment To be Submitted
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	HWMU Decontamination: Section 3.2.3, p. 3-13 HWMU Remediation: Section 3.5.3, pp. 3-69 to 3-73 (use of Safe Shutdown, D&D of complexes)
	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996	Decontamination of Above-Grade Unit Structures and Equipment: To be Submitted for Each D&D Complex Plant 1 Storage Bldg. - Bldg. 67 (25): HWMU Decontamination: Section 3.7, pp. 42 to 45 Materials Management: Table 2-4, p. 12
6. Decontamination Efforts (Closure Guidance Item 3.10) - Continued	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse - Bldg. 81 (35): HWMU Decontamination: Section 3.13, pp. 39 to 40 Materials Management: Table 2-1, p. 12
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37 KC-2 Warehouse - Bldg. 63 (34) Section 3.23, pp. 42 to 43
	FINAL Implementation Document for HWMUs #28 and 50, December 1998	UNH Tanks - NFS Storage Area (46): Section 3.1, pp. 23 to 24. Trane Incinerator (28): HWMU Decontamination
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	OU5 FINAL Sitewide Excavation Plan, July 1998	Decontamination of Excavation Equipment: Section F.2.3, Installation of Decontamination and Wash Facilities
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, April 1999 Area 1, Phase II Integrated Remedial Design Package, September 1998	Area/Phase-Specific Requirements for Decontamination of Excavation Equipment: To be Submitted Sludge Drying Beds (41): Equipment Decontamination: Section 5.2, Loading and Hauling, pp. 5-2 to 5-3 Remediation-Generated Water Management: Section 3.4.4. Remediation-Generated Wastewater Management, pp. 3-33 to 3-35
7. Remediation Standards for Soils and Groundwater ² (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13)	OU1 FINAL Record of Decision, January 1995	Waste Pit (27, 42) Area: pp. 9-1 to 9-11 Tables B-5 to B-16
	OU1 OU1 Remedial Design Pre-Final Design Package II, March 1996	Waste Pit (27, 42) Area: pp. A-3 to A-7
	OU5 FINAL Record of Decision, January 1996	Final Remediation Levels (FRLs) for Soil and Groundwater: Table 9-3, p. 9-23 Table 9-4, p. 9-26
7. Remediation Standards for Soils and Groundwater ² (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13) - Continued	OU5 FINAL Sitewide Excavation Plan, July 1998	Summary of Contaminant Levels Pertinent to Soil Remediation at the FEMP: Table 1-4; Final Remediation Levels: Section 2.1.3, p. 2-10 Constituents of Ecological Concern: Section 2.1.4, p. 2-13 Preliminary Identification of Primary, Secondary COCs and Ecological COCs Assigned to Remediation Areas: Table 2-7
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, April 1999	Area/Phase-Specific FRLs: To be Submitted Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Section 5.1, Excavation and Monitoring, pp. 5-1 to 5-2
8. Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) - Includes Sampling to Define the Extent of Contamination and Sampling to Verify the Unit is Clean.	OU1 FINAL Remedial Investigation Report, August 1994	Procedures for Determining Nature and Extent of Contamination at Waste Pit Area: Waste Pit 4 (27), Waste Pit 5 (42): Chapter 2, pp. 2-1 to 2-161
	OU1 FINAL Remedial Action Documents Package, April 1999	Procedures for Sampling and Analysis of Waste Pit Area: Certification of Waste Pit Area Cleanup: Sampling and Analysis Plan
	OU5 FINAL Remedial Investigation Report, March 1995	Procedures for Determining Nature and Extent of Soil Contamination: Chapter 2, pp. 2-1 to 2-83

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	OU5 FINAL Sitewide Excavation Plan, July 1998	Procedures for Certifying Attainment of Soil Cleanup: Section 2.2.2, p. 2-18 to 2-19; Section 2.2.5, p. 2-22 to 2-23; Section 3.4, p. 3-22 to 3-23; Appendix G, Certification Design Rationale
	OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, December 1998	Area/Phase-Specific Procedures for Certifying FRL Attainment: To be Submitted Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, p. 3-3; Section 5.0, Excavation Monitoring, pp. 5-1 to 5-2
	OU5 Certification Design Letters for Individual Remediation Areas	Area/Phase-Specific Procedures for Certifying FRL Attainment: To be Submitted
9. Description of Removal Efforts and Treatment Processes (Closure Guidance Item 3.15)	OU1 FINAL Remedial Design Documents Package, August 1998	Removal and Handling of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan
	OU1 FINAL Remedial Action Documents Package, April 1999	Processing of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42): Operations and Maintenance (O & M) Plan for Remediation Facilities
	OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement	Removal and Treatment of Waste in HWMU: To be Submitted for Each D&D Complex (where applicable)
9. Description of Removal Efforts and Treatment Processes (Closure Guidance Item 3.15) - Continued	OU5 FINAL Feasibility Study Report, June 1995	Evaluation of Technologies and Process Options: Section 3.3, p. 3-5
	OU5 FINAL Sitewide Excavation Plan, July 1998	Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Sitewide Extent of Contamination by Constituent
	OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas Area 1, Phase II Supplemental Characterization Package, April 1999	Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: To be Submitted Sludge Drying Beds (41): Management of Sludge: Section 3.3, Material Disposition Sampling Plan, p. 3-3; Management of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4
10. Landfill Closure Requirements - (if applicable) ¹ - (Closure Guidance Item 3.16)	OU1 FINAL Record of Decision, January 1995	ARARs: Relevant and Appropriate as some remedial alternatives may require closure to these standards Tables B-28 to B-29
	OU1 FINAL Remedial Design Work Plan, June 1995	Revised ARARs: Tables A-24 to A-25
	OU5 FINAL Record of Decision, January 1996	Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure ¹ : ARARs: Table B-3, p. B.3-10
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Landfill Closure Requirements: To be Submitted (if applicable)

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	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
11. Certification (Closure Guidance Item 3.18)	OU1 Remedial Action Report	Certification Sampling Results: To be Submitted
	OU3 Project Completion Reports	Summary of HWMU Remediation Activities/Statement of Conformance with Requirements and Performance Standards: To be Submitted for Each D&D Complex
11. Certification (Closure Guidance Item 3.18) - Continued	FINAL Plant 1 Complex - Phase 1 Project Completion Report, December 1997	Plant 1 Storage Bldg. - Bldg. 67 (25): Section 2.1.3, pp. 7 to 8
	FINAL Thorham/Plant 9 Complex Project Completion Report, April 1999	Plant 9 Warehouse - Bldg. 81 (35): Section 2.2.11, pp. 12 to 14
	DRAFT Project Completion Report for the Decontamination of HWMU No. 50 - UNH Tanks, Hot Raffinate Building and HWMU No. 28 - Trane Incinerator, May 1999	Trane Incinerator (28); UNH Tanks - Raffinate Bldg. (50)
	OU5 Certification Reports for Individual Remediation Areas	Area/Phase-Specific Certification Reports: To be Submitted
	OU5 Remedial Action Report	Summary of Remedial Activities and Statement of Conformance with Requirements and Standards: To be Submitted
12. Status of Facility (or Unit) After Closure (Closure Guidance Item 3.19)	OU1 FINAL Record of Decision, January 1995	Status of Waste Pits After OU1 Remedial Action: pp. 10-1 to 10-9
	OU3 FINAL Record of Decision for Interim Remedial Action, June 1994	Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11
	OU5 FINAL Record of Decision, January 1996	Status of FEMP After Soil and Groundwater Remediation: Section 4.0, p. 4-1
	OU5 FINAL Site-wide Excavation Plan, July 1998	Certification Reports: Section 7.4, pp. 7-10 to 7-14
	OU5 Certification Reports for Individual Remediation Areas	Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted

¹ Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

² The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.

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Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FEMP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].

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