



State of Ohio Environmental Protection Agency

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September 1, 2004

Mr. William J. Taylor
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
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RE: APPROVAL OF THE MULTI-COMPLEX D&D REPORT

Dear Mr. Taylor:

This letter provides Ohio Environmental Protection Agency approval of the Completion Report for the D&D of the Multi-Complex. We approve this Plan without conditions but we take this opportunity to clarify some ambiguities in the report regarding the closure of RCRA units.

According to the July 8, 2004 Cross Reference Index, the referenced report is meant to satisfy closure certification requirements for the following hazardous waste management units: NAR System, Box Furnace, Oxidation Furnace, Plant 8 Warehouse, and the various UNH Tanks. On page 35 of the referenced report, Section 3.10 (Conclusions), it is correctly stated that the NAR System and Box Furnace can be closed as above grade units since there is no soil contamination associated with these units. This issue had been previously addressed through a July 15, 2003 e-mail from Philip Harris of Ohio EPA.

This section goes on to state that all field activities have been completed to achieve closure of the NAR System, Box Furnace, Oxidation Furnace, Plant 8 Warehouse, and the various UNH Tanks. Ohio EPA documented numerous releases from these tanks, and also documented that the secondary containment systems associated with these tanks did not meet standards identified in the hazardous waste rules. It therefore is appropriate that the remediation of soils underneath and adjacent to these tanks should be documented as a part of the RCRA closure.

The Soils and Disposal Facility Project should close the loop on the RCRA closure by correlating the location of the HWMUs associated with releases to the soil (all HWMUs except those two listed above) with the individual soil certification units. This is most conveniently accomplished in the Certification Design Letter. Constituents of Concern are also chosen during the CDL and the SDFP will need to take care to include all RCRA constituents. The Certification Report should reference sampling to define the extent of contamination, the amount of soil removed, the proper disposal of the soil into either the OSDF or a commercial disposal facility, and the sampling of the soil to document the

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removal of the contamination.

The final step in closing the loop will be the OU 3 Final Certification Report per the 1996 Integrated RCRA/CERCLA Director's Findings and Orders.

Should you have any questions, please contact Paul Pardi, Tom Ontko or me.

Sincerely,



for

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

- cc: Jim Saric, U.S. EPA
- Mark Shupe, GeoTrans, Inc.
- Michelle Cullerton, Tetra Tech EM Inc.
- Ruth Vandergrift, ODH