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**CLOSURE PLAN FOR THE BARIUM CHLORIDE WASTE SALT  
TREATMENT FACILITY - FEED MATERIALS PRODUCTION CENTER  
(FMPC)**

09/01/87

DOE-351-87  
DOE-FN      USEPA  
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PLAN



Department of Energy

Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37831

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SEP 0 1 1987

DOE 351-87

Mr. William Muno  
Supervisor of RCRA Enforcement Section  
US - EPA  
Region V - SME-12  
230 S. Dearborn Street  
Chicago, Illinois 60604

**CLOSURE PLAN FOR THE BARIUM CHLORIDE WASTE SALT TREATMENT FACILITY - FEED MATERIALS PRODUCTION CENTER (FMPC)**

Dear Mr. Muno:

In accordance with the requirements of 40 CFR 265.110 - 265.120 and the FMPC RCRA Part B Permit Application, attached with this letter is the written closure plan for the Barium Chloride Waste Salt Treatment Facility located in the FMPC Pilot Plant. This closure plan is submitted for USEPA-5 approval.

The subject treatment facility was used as a development facility to investigate the processing of salt waste. This waste was generated from the cleanout of a molten salt bath in the heat-treatment uranium metal extrusion operation at the RMI facility in Astabula, Ohio. The FMPC received the salt waste from RMI which was generated in support of DOE's programs. The treatment facility operated for about three months (12/85 - 3/86) and processed approximately 18,500 pounds of a eutectic salt mixture containing about 45 percent barium chloride.

Please contact me if you have any questions on the attached closure plan.

Sincerely,

  
James A. Reafsnycer  
Site Manager

DP-84:Collier

000001

Attachment:As stated

cc w/att.

Mary Logan, USEPA-5  
Catherine McCord, USEPA-5  
Bill Franz, USEPA-5  
Graham Mitchell, OEPA-Dayton  
Don Marshall, OEPA-Dayton  
Tom Winston, OEPA-Dayton  
Technical Records, OEPA-Columbus, OH  
Margaret Wilson, SE-31, ORO  
Bill Snyder, CC-10, ORO

cc w/o att.

Bill Bibb, DP-80, OR  
Bob Sleeman, ER-12, ORO



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Department of Energy

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

SEP 01 1987

DOE 351-87

Mr. Don Marshall  
Southwest District Office  
Ohio Environmental Protection Agency  
7 East Fourth Street  
Dayton, Ohio 45402-2086

**CLOSURE PLAN FOR THE BARIUM CHLORIDE WASTE SALT TREATMENT FACILITY - FEED MATERIALS PRODUCTION CENTER (FMPC)**

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**CLOSURE PLAN FOR THE  
BARIUM CHLORIDE WASTE SALT TREATMENT FACILITY**

August 1987

Prepared by

Waste Remediation Environmental Engineering

Westinghouse Materials Company of Ohio

P. O. Box 398704

Cincinnati, Ohio 45239-8704

Prepared for:  
Feed Materials Production Center  
U. S. Department of Energy

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INTRODUCTION

The Feed Materials Production Center (FMPC) is a U.S. Department of Energy (DOE) owned facility operated by Westinghouse Materials Company of Ohio (WMCO) for the purpose of producing uranium metal. The hazardous waste covered by this plan may also be radioactive, therefore, all references to hazardous waste in this closure plan will be assumed to mean hazardous/radioactive (mixed) waste. The FMPC maintains the following hazardous waste treatment facility located in the FMPC Pilot Plant.

Barium Chloride Waste  
Salt Treatment Facility

Detailed information concerning this facility and the type of waste treated in this facility can be found in the FMPC Resource Conservation and Recovery Act (RCRA) Part B Permit Application, sections B and C.

The discontinued use of the above listed Barium Chloride Waste Salt Treatment Facility necessitates closure of the facility. This closure plan is developed to address proper health and environmental protection. Proper safety practices will also be followed during closure. This plan is submitted to gain approval of final closure activities from the Regional Administrator of the U.S. Environmental Protection Agency (EPA).

The  $BaCl_2$  Waste Salt Treatment Facility was used as a development facility under a Plant Test Authorization (PTA) to investigate the processing of salt waste. This waste is generated from the cleanout of a molten salt bath used in the heat-treatment uranium metal extrusion operation at the Reactive Metals Incorporated (RMI) Company's extrusion plant in Ashtabula, Ohio, which

supports DOE uranium production operations managed by WMCO at the FMPC. WMCO is required by DOE to receive the wastes which RMI generates in support of FMPC programs.

During the facility's three months of operation (December 12, 1985 through March 10, 1986), the treatment facility was used to treat approximately 18,500 pounds of a eutectic salt mixture composed of 45 percent barium chloride, 32.5 percent potassium chloride, and 22.5 percent sodium chloride. The Barium Chloride component, a hazardous D005 toxic waste as defined by the RCRA EP Toxicity Test, was converted to Barium Sulfate. Barium Sulfate is a non-hazardous material. The PTA was discontinued when corrosion problems were encountered within the process tanks and piping of the treatment facility. Based on the data gathered during the PTA, it was determined that construction of a new treatment facility would be more advantageous than a complete renovation of the existing facility. Construction of a new Barium Chloride Waste Salt Treatment Facility is planned.

I-1 CLOSURE PLAN

This closure plan is submitted in accordance with the requirements of 40 CFR 265.110 through 120 (Subpart G) and the FMPC RCRA Part B Permit Application. The subpart G regulation requires the owners and operators of hazardous waste management facilities to have a written closure plan for hazardous waste Treatment, Storage, or Disposal (TSD) facilities. The closure plan must identify the steps to be taken to completely close a facility at the end of its operating life. Copies of the closure plan and all revisions to the plan must be kept at the facility until closure is completed and certified in accordance with 40 CFR 265.115. To meet requirements of 40 CFR 265.110 through 120, the FMPC RCRA Part B Permit Application included a generalized closure plan that outlined the steps necessary to close any of the FMPC's hazardous waste TSD facilities. As an addition to the RCRA Part B Permit Application, this closure plan specifically addresses closure of the FMPC Barium Chloride Waste Salt Treatment Facility located in the FMPC Pilot Plant. To meet requirements of 40 CFR 265.112(a), the most recent copy of the Closure Plan will be provided to the Regional Administrator upon request. In addition, should an amendment to this closure plan be required for either of the reasons listed below, a written request will be provided to the Regional Administrator and will include a copy of the amended Closure Plan. The following situations would require an amendment to the plan:

1. A change in the expected date of closure.
2. An unexpected event encountered during closure activities.

If either of these conditions are met, an amendment to the closure plan will be submitted to the Regional Administrator within 30 days of the occurrence.

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I-1a Closure Performance Standard

Closure of the Barium Chloride Waste Salt Treatment Facility will be completed in accordance with the performance standards as stated in 40 CFR 265.111, 265.197 and 265.404. These standards include the following:

- \* Minimizing the need for future (post closure) maintenance. This will be accomplished by completely decontaminating or placing in storage all equipment associated with the treatment facility. Post closure maintenance will not be required since the facility will no longer exist.
  
- \* Controlling, minimizing, or eliminating the threats to human health and the environment from the post closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere. This will be achieved by removing all hazardous waste materials contained within the treatment facility piping and equipment, transferring the waste materials to storage containers, and placing the storage containers into approved RCRA storage facilities at the FMPC. Post closure threats to human health and the environment will not be increased beyond those imposed by the current practice of storing hazardous wastes in approved FMPC RCRA storage areas.

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I-1b Partial Closure and Final Closure Activities

No partial closure of the Barium Chloride Waste Salt Treatment Facility will be attempted. No additional treatment operations will be conducted at the treatment facility. Final and complete closure of the Barium Chloride Waste Salt Treatment Facility is planned and will be accomplished upon approval as outlined in Section I-1d.

Notification of final closure will be made at least 45 days prior to the date of beginning closure, per 40 CFR 265.112 section (d)(1). This notification will be in the form of submittal of the Closure Plan to the EPA Regional Administrator. Commencement of closure activities will not occur until approval of the Closure Plan is granted and the 45-day notification period has elapsed. Upon completion of final closure, an independent, registered Professional Engineer and the DOE as owner and operator will certify that the facility was closed according to the approved closure plans. The guidelines to be followed in closing this facility are described in sections 1d(1) dealing with closure of tanks.

I-1c Maximum Waste Inventory

The Barium Chloride Treatment Facility was a batch type treatment process consisting of three basic operations: dissolving the Barium Chloride salt, adding a Barium Sulfate precipitating agent, and filtrating the Barium Sulfate. The Barium

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Sulfate produced in the treatment process, 19 drums, is currently in storage at the FMPC. The treatment facility consisted of tanks, filter presses, and associated piping, pumps, and valves. The maximum amount of Barium Chloride waste salt treated at one time was 2,900 pounds. This amount of waste salt was processed in batch form from December 12 through December 16, 1985. Seven batches of waste salt were treated at the facility between December 1985 and March 1986. A total of approximately 18,500 pounds of waste salt were treated. No drummed Barium Chloride or drummed Barium Sulfate is currently stored at the treatment facility. Section I-1d(1) details the amount and location of each of these materials that remain in the facility equipment at this time.

I-1d Inventory Removal, Disposal, or Decontamination of Equipment

Samples of the drummed Barium Sulfate material resulting from the treatment process will be taken and EP Toxicity Tests for heavy metals (SW-846 test method) will be performed to verify that the Barium Sulfate material resulting from the treatment process is a non-hazardous waste. If analysis by the EP Toxicity Test indicates that hazardous constituents are present in the Barium Sulfate these drums will be handled as hazardous waste and labeled as such. The waste materials will be stored at the approved FMPC storage facilities. Barium Sulfate materials confirmed to be non-hazardous will be stored on the FMPC Plant 1 Pad.

Samples of the waste material residues presently contained within the facility tanks and equipment will be taken and EP Toxicity

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Tests for heavy metals (SW-846 test method) will be performed to determine whether the residues should be treated as hazardous waste. The waste material residues presently contained within the facility tanks and equipment will be removed and placed in 55-gallon drums as a part of the closure. The method of removal will involve utilizing existing treatment facility pumps and gravity flow along with existing treatment facility transfer lines to empty the waste from the tanks and place the waste into the 55-gallon drums. Water will be used to rinse any residues from the tank walls that will not readily mobilize. This rinse water will be collected, placed into 55-gallon drums, and analyzed only for constituents shown in EP Toxicity Test of residues. If analysis by the EP Toxicity Test proves that hazardous constituents are present in the residues or wash water, these drums will be handled as hazardous waste and labeled as such. RCRA trained personnel will place the drums onto wooden pallets, load the pallets onto a transportation trailer with a forklift, move the trailers to one of the FMPC hazardous waste storage facilities, off-load the pallets and place the pallets and 55-gallon drums inside the diked storage facility. The waste material residues will be stored at the approved FMPC RCRA storage facilities until the scheduled construction of the proposed Barium Chloride Waste Salt Treatment Facility is complete and treatment to render the waste non-hazardous as defined by EP Toxicity can be accomplished. Any residues that prove to be non-hazardous will be drummed and transported to the FMPC Plant 1 Pad for storage. The non-hazardous residues and/or water rinsates will be disposed of according to the existing NPDES permits or the Solid Waste Management program.

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The equipment in place at the existing facility will be dismantled in a method that minimizes further contamination of the facility and exposure to personnel involved in the closure of the treatment system. When waste residue removal from the treatment system is complete, all facility equipment will be analyzed for barium contamination by collecting a water rinsate that has been flushed through the facility equipment and performing an EP Toxicity Test on this rinsate for all heavy metals previously detected in the residues. A visual inspection of the equipment will be performed as a final check to verify particle removal from the equipment. If equipment shows evidence of contamination from either the analysis of the rinsate or visual inspection, decontamination efforts in the form of water flushing will be used to remove the waste residues. If a piece of facility equipment cannot be completely decontaminated, it will be handled as a hazardous waste, and placed in storage until further treatment methods can be identified. Upon successful decontamination of equipment, the item will be either returned to service or handled as FMPC Abandoned in Place equipment. In addition, all waste water used as a cleaning agent that proves hazardous by method of EP Toxicity will be handled as a hazardous waste and stored appropriately until treatment in the proposed Barium Chloride Waste Salt Treatment Facility can be accomplished.

I-1d(1) Closure of Tanks

There are four tanks associated with the treatment facility. Tank D-1, a 1,069-gallon stainless steel

tank, was used as a salt dissolution tank. In this tank, Barium Chloride waste salt was combined with water and agitated until the salt dissolved completely. Tank F13A-164, a 2,142 gallon tank, was used as a precipitating tank for converting Barium Chloride to Barium Sulfate. Tank D-15, a 720-gallon tank was used as a holding tank for storing Barium Sulfate filtrate. Tank W-10, a 2,200-gallon tank, was used for stripping ammonia from the Barium Sulfate filtrate.

Tank D-1 currently contains approximately 900 gallons of what is assumed to be dissolved Barium Chloride Waste Salt material. This material will be analyzed for heavy metal by method of the EP Toxicity Test. In the event that this material proves hazardous, existing facility pumps and transfer lines will be utilized to remove the residues and place the residues into 55-gallon drums. The drums will be appropriately labeled, loaded onto wooden pallets, placed on transportation trailers by forklift, transported to the appropriate FMPC RCRA storage facility and placed in storage. All operations will be performed by RCRA trained personnel. Upon complete residue removal, the tank will be analyzed for contamination by rinsing the inside of the tank with a clean water rinsate, and analyzing the rinsate by method of the EP Toxicity Test for only heavy metals previously detected in the residues. Should the tank prove to have hazardous

constituents remaining on the inner walls, decontamination efforts in the form water flushing will be used until the rinsate proves nonhazardous after undergoing an EP Toxicity Test for those heavy metals previously detected in the residues. Upon complete decontamination, the tank will be treated as FMPC Abandoned in Place equipment.

Any remaining liquid from tank F13A-164 will be analyzed for heavy metals by method of the EP Toxicity Test. If the residues prove nonhazardous, the residues will be removed by method of gravity flow or pumping with existing facility pumps, placed in suitable storage drums, and handled as nonhazardous waste. A rinsate of clean water will be used to wash down the tank walls. The rinsate will then be analyzed by method of the EP Toxicity Test for heavy metals previously detected in the residues. Should the tank prove nonhazardous, it will be treated as FMPC Abandoned in Place equipment. If the tank proves to have hazardous constituents remaining on the inner walls, decontamination efforts in the form of water flushing will be used to remove the hazardous constituents. Rinsate tests will be run until the rinsate proves nonhazardous by method of the EP Toxicity Test for only heavy metals previously detected in the residues. Upon complete decontamination the tank will be treated as FMPC Abandoned in Place equipment.

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Tank D-15 currently contains approximately 450 gallons of what is assumed to be Barium Sulfate that remained after the final batch treatment. This material will be sampled and analyzed by method of the EP Toxicity Test for heavy metals to verify that the waste is nonhazardous. Upon verification that the waste is nonhazardous, the entire tank contents will be removed by gravity flow and placed in storage in the FMPC Plant 1 pad. Should the waste material prove to be hazardous, it will be removed and stored in the manner of tank D-1 waste removal and storage. To verify that tank D-15 has no hazardous constituents remaining on the inner walls, the inside tank walls will be rinsed with clean water, the rinsate collected and subjected to an EP Toxicity Test for heavy metals previously detected in the residues to verify that the tank be treated as nonhazardous. The tank will be decontaminated in a manner consistent with the decontamination of Tank D-1. Tank D-15 will then be handled under the FMPC Abandoned in Place equipment program.

Tank W-10 currently contains less than one inch of liquid. Based upon review of operating procedures for this facility, this tank has never received any hazardous waste for treatment. However, to verify that no hazardous constituents are present in Tank W-10, an EP Toxicity test for heavy metals will be performed on the liquid that is present in Tank W-10.

performed on the liquid that is present Tank W-10. Should the liquid fail the EP Toxicity Test for heavy metals, the liquid will be drummed and placed in storage consistent with the methods used for Tank D-1 waste removal and storage. In addition, the inside tank walls will be rinsed with clean water, the rinsate collected and subjected to an EP Toxicity Test for only heavy metals previously detected in the residues to verify that the tank can be treated as nonhazardous as defined by EP Toxicity Test standards. Upon verification that the tank is not contaminated, Tank W-10 will be made available for service to the FMPC Pilot Plant. Only this tank will be made available for future use at the FMPC.

Other equipment employed in the treatment facility includes 4 pumps, 1 filter press, and the piping and valves used to transfer the salt solution. This equipment will be removed, cleaned with water flushing and steam cleaning, and sampled to verify that all hazardous residues have been removed. The sampling analysis will involve collecting a clean water rinsate from the facility equipment and performing an EP Toxicity Test on the rinsate. Any equipment that proves salvageable will be placed in service, otherwise, the equipment will be disposed of as a nonhazardous waste via the FMPC Abandoned in Place Equipment program. Any equipment that cannot be completely decontaminated will be drummed and placed

into one of the FMPC-approved RCRA storage facilities until further treatment methods can be identified. This storage will be handled in a manner consistent with storage of the residues removed from Tank D-1.

In addition to the tanks and equipment, certain floor sections of the treatment facility will require decontamination. This will involve collecting a clean water rinsate from the floor sections and analyzing the rinsate for the EP Toxicity Test. Should the rinsate fail the EP Toxicity Test, decontamination efforts in the form of steam cleaning, scrubbing the surface, or grinding of the floor sections will be attempted to remove the contaminants. If a floor section cannot be completely decontaminated, it will be removed and placed into storage in a manner consistent with the storage of Tank D-1 residues until further treatment methods can be identified for this type of material. In addition, those floor sections which prove to be contaminated will be removed after decontamination and integrity of the floor will be investigated.

I-1d(2) Closure of Waste Piles

This section is not applicable to this closure plan. No waste piles are associated with the Barium Chloride Waste Salt Treatment Facility.

I-1d(3) Closure of Surface Impoundments

This section is not applicable to this closure plan. No surface impoundments are associated with the Barium Chloride Waste Salt Treatment Facility.

I-1d(4) Closure of Incinerators

This section is not applicable to this closure plan. No incinerators are associated with the Barium Chloride Waste Salt Treatment Facility.

I-1d(5) Closure of Land Treatment Facilities

This section is not applicable to this closure plan. No land treatment Facilities are associated with the Barium Chloride Waste Salt Treatment Facility.

I-1e Closure of Disposal Units

This section is not applicable to this closure plan. The remaining untreated waste salt will be stored at the FMPC RCRA storage facilities until the waste can be converted to nonhazardous Barium Sulfate, as defined by EP Toxicity testing, in the new treatment facility currently being designed. No permanent piles, landfills, or surface impoundments will exist as a result of closing the Barium Chloride Waste Salt Treatment Facility.

**I-1f Continuance of Operations**

This section is not applicable to this closure plan. There are no hazardous land storage, treatment, or disposal units at the FMPC associated with the Barium Chloride Treatment Facility. Therefore, monitoring and control of this type of facility does not pertain to this closure plan and will not be addressed.

**I-1g Schedule for Closure**

See Attachment 1.

**I-1h Extensions for Closure Time**

An extension for closure is required only if the facility will not be completely closed within 180 days of approval of the closure plan. The schedule presented in Attachment I demonstrates that closure is anticipated within this time frame. If additional time will be required to close the facility, the FMPC will make such a request of the EPA Region V Administrator.

I-2 POST-CLOSURE PLAN

This section is not applicable to this closure plan. A post-closure plan is required only when closing hazardous waste surface impoundments, land treatment facilities, or landfills. Closure of the Barium Chloride Treatment Facility does not involve any of these types of units.

I-3 NOTICE IN DEED

A notation will be made in the FMPC property deed stating that hazardous waste treatment, storage, and disposal sites do now and will continue to exist on the land occupied by the FMPC. As noted in the general closure plan for the FMPC RCRA facilities, this site will remain in the ownership and care of the United States Department of Energy or other Federal agency. Past use of the site precludes any conditions under which the property deed would be transferred to the public domain.

I-4 CLOSURE COST ESTIMATE

This section is not applicable to this closure plan. The FMPC is a federally owned facility. According to 40 CFR 265.140 (c), the Federal government is exempt from subpart H, Financial Requirements, which includes submittal of a cost estimate for closure.

**I-5 FINANCIAL ASSURANCE MECHANISM FOR CLOSURE**

This section is not applicable to this closure plan. The FMPC is a federally owned facility. According to 40 CFR 265.140 (c), the Federal government is exempt from subpart H, Financial Requirements, which includes submittal of a financial assurance mechanism.

**I-6 POST-CLOSURE COST ESTIMATE**

This section is not applicable to this closure plan. The FMPC is a federally owned facility. According to 40 CFR 265.140 (c), the Federal government is exempt from subpart H, Financial Requirements, which includes submittal of post-closure cost estimate.

**I-7 FINANCIAL ASSURANCE MECHANISM FOR POST-CLOSURE CARE**

This section is not applicable to this closure plan. The FMPC is a federally owned facility. According to 40 CFR 265.140 (c), the federal government is exempt from subpart H, Financial Requirements, which includes submittal of a financial assurance mechanism for post-closure care.

**I-8 LIABILITY REQUIREMENTS**

This section is not applicable to this closure plan. The FMPC is a federally owned facility. According to 40 CFR 265.140 (c), the Federal government is exempt from subpart H, Financial Requirements, which includes submitting proof of liability in the event of accident.

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I-9 USE OF STATE REQUIRED MECHANISMS

This section is not applicable to this closure plan. The FMPC is a federally owned facility. According to 40 CFR 265.140(c), the Federal government is exempt from subpart H, Financial Requirements, which includes meeting state liability requirements.

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## ATTACHMENT 1

SCHEDULE FOR CLOSURE OF THE  
BARIUM CHLORIDE WASTE SALT  
TREATMENT FACILITY

<u>Action</u>	<u>Cumulative Days To Complete</u>
o Initiate closure.	0
o Remove and store waste residues.	30
o Analyze equipment for contamination.	90
o Complete decontamination efforts.	150
o Decommission facility.	160
o Obtain closure certificate.	180

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