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Department of Energy



Ohio Field Office
Fernald Closure Project
175 Tri-County Parkway
Springdale, Ohio 45246
(513) 648-3155

NOV 28 2005

Mr. Paul Pardi, RCRA Group Leader
and FFCA Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-0026-06

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 (DF&O), Thomas E. Crepeau, OEPA to Phil Hamric, U. S. DOE and John Bradburne, FERMCO, dated June 6, 1996.

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

Section V of the DF&O requires the Fernald Closure Project to provide an updated copy of the cross-reference table following the submittal of a referenced CERCLA document. The Draft Certification Report for Area 4B - Part One and the Draft Certification Design Letter and Certification Project Specific Plan for Area 6 Waste Pits 4, 5, and 6 were submitted to Ohio and U.S. EPA on the November 21, 2005. The specific references to these documents in the cross-reference table have been highlighted.

If you have any questions or require additional information, please contact me at (513) 648-3139.

Sincerely,

Johnny W. Reising
Director

Mr. James A. Saric
Mr. Tom Schneider

cc: w/enclosure
E. Brucken
F. Miller
E. Skintik, DOE-FCP
→ AR Coordinator
RCRA Operating Record

CROSS-REFERENCE INDEX FOR FCP 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</p>
	<p>OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997</p>	<p>Waste Pit 5 (42): Description, p. 1-24 to 1-27; History, pp. 1-36 to 1-37; Drawings, pp. 1-83, 1-89</p>
	<p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement</p>	<p>HWMU Component Number and Associated D&D complex: Table 3-10, p. 3-71</p>
	<p>FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996</p>	<p>D&D Complex Locations: Figure 2-2, p. 2-17</p>
	<p>FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997</p>	<p>Drawing of HWMU: To be submitted for Each D&D Complex</p>
	<p>FINAL Misc. Small Structures Implementation Plan, October 1998</p>	<p>Plant 1 Storage Bldg. - Bldg. 67 (25): Figure D-11</p>
	<p>FINAL Implementation Document for HWMUs #28 and #50, December 1998</p>	<p>Plant 9 Warehouse - Bldg. 81 (35): Figure D-10, D-11</p>
	<p>FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999</p>	<p>Waste Oil Decant Shelter (component of Trane Incinerator) (28): No drawing available for this unit</p>
	<p>FINAL Multi-Complex Implementation Plan, October 2001</p>	<p>KC-2 Warehouse - Bldg. 63 (34): Figure D-22, D-23</p>
	<p>FINAL Laboratory Complex Implementation Plan, April 2002</p>	<p>UNH Tanks - NFS Storage Area (46): Figure D-1</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>FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002</p> <p>OU5 FINAL Remedial Investigation Report, March 1995</p>	<p>General Location Map of HWMUs to be Closed Under CERCLA: Figure 4-112</p> <p>Size and Dimensions of HWMUs: Table 1-12</p> <p>FCP Topographic Map: Figure 3-1</p> <p>General HWMU Information and Locations Within OU5 Areas, Appendix D:</p> <p>Plant 1 Storage Pad (20):</p> <p>Plant 1 Area, Section D.2.1, p. D.2-2</p> <p>UNH Tanks (46-50), NAR System (10), Trane Incinerator (28):</p> <p>Plant 2/3 Area, Section D.2.2, p. D.2-19</p> <p>Storage Pad N of Plant 6 (36):</p> <p>Plant 6 Area, Section D.2.4, p. D.2-28</p> <p>Plant 8 East and West Drum Storage Pads (17, 18), Box Furnace (14), Oxidation Furnace #1 (15):</p> <p>Plant 8 Area, Section D.2.5, p. D.2-33</p> <p>Sludge Drying Beds (41):</p> <p>Sewage Treatment Plant Area, Section D.2.7, p. D.2-41</p> <p>Abandoned Sump West of Pilot Plant (22), Tank T-2 (54):</p> <p>Pilot Plant Area Section D.2.8, p. D.2-45</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area S of W-26 (5):</p> <p>Laboratory Area, Section D.2.9, p. D.2-51</p> <p>Tank Farm Sump (11):</p> <p>Tank Farm and Boiler House Area, Section D.2.13, p. D.2-69</p> <p>Fire Training Facility (1):</p> <p>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>OU3 FINAL Remedial Investigation/Feasibility Study Report, February 1996</p> <p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement</p> <p>FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996</p> <p>FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997</p>	<p>Waste Managed in Unit:</p> <p>Waste Pit 4 (27): pp. 4-60 to 4-70, pp. 1-35 to 1-36</p> <p>Waste Pit 5 (42): pp. 4-70 to 4-77, pp. 1-36 to 1-37</p> <p>Waste Managed in HWMU:</p> <p>Table K-1</p> <p>Waste Managed in HWMU:</p> <p>To be Submitted for Each D&D Complex</p> <p>Plant 1 Storage Bldg. - Bldg. 67 (25):</p> <p>Section 3.7, p. 42</p> <p>Plant 9 Warehouse - Bldg. 81 (35)</p> <p>Section 3.13, pp. 39 to 40</p>

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<p>2. List of Hazardous Waste(s) Managed in Unit(s) (Closure Guidance Item 3.5) - Continued</p>	<p>OU5 FINAL Integrated Remedial Investigation Report, March 1995</p> <p>OU5 FINAL Feasibility Study Report, June 1995</p> <p>OU5 FINAL Sitewide Excavation Plan, July 1998</p> <p>OU5 Integrated Remedial Design Packages for Individual Remediation Areas</p> <p>Area 1, Phase II Supplemental Characterization Package, April 1999</p> <p>FINAL Implementation Plan for Area 3A/4A, May 2001</p> <p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p> <p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p> <p>FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005</p>	<p>HWMUs with Potential Soil Contamination: Tables 4-68 and 4-69</p> <p>HWMU Constituents of Concern (COCs) for Soil: Tables 4-4, 4-5 and 4-6</p> <p>HWMU COCs: Table 2-1</p> <p>Sludge Drying Beds (41): Section 3.0, Disposition of Sludge Cake and Associated Debris, p. 3-1</p> <p>Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-12</p> <p>Fire Training Facility (11): Section 3.5, Identification of Area-Specific Constituents of Concern, pp. 3-9 to 3-10; Table 3-1, Preliminary Area-Specific Constituents of Concern</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Table 2-4, p. 2-31</p> <p>Waste Pit #4 (27): Section 1.2.4, Waste Pit 4, pp. 1-4 to 1-5</p> <p>Waste Pit 5 (42): Section 1.2.5, Waste Pit 5, p. 1-5</p> <p>Removal of Waste - Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan</p> <p>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</p>
<p>3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6)</p>	<p>OU1 FINAL Remedial Design Documents Package, August 1998</p> <p>OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997</p>	<p>Removal of Waste - Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan</p> <p>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</p>

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<p>3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6) - Continued</p>	<p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement</p> <p>FINAL Plant 1 Complex - Phase Implementation Plan, March 1996</p> <p>FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997</p> <p>FINAL Misc. Small Structures Implementation Plan, October 1998</p> <p>FINAL Implementation Document for HWMUs #28 and #50, December 1998</p> <p>FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999</p> <p>FINAL Multi-Complex Implementation Plan, October 2001</p>	<p>Removing Waste from HWMU Storage, Treatment, and Disposition of Waste: To be Submitted for Each D&D Complex</p> <p>Plant 1 Storage Bldg. - Bldg. 67 (25): Section 3.7, p. 42</p> <p>Plant 9 Warehouse - Bldg. 81 (35): Section 3.13, pp. 39 to 40</p> <p>Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37</p> <p>KC-2 Warehouse - Bldg. 63 (34) Section 3.23, p. 42</p> <p>UNH Tanks - NFS Storage Area (46): Section 3.1, pp. 23 to 24</p> <p>Trane Incinerator (28): Remedial Tasks</p> <p>UNH Tanks - Raffinate Bldg. (50): Remedial Tasks, HWMU Decontamination</p> <p>Plant 6 Warehouse - Bldg. 79 (37): Section 3.9, p. 37</p> <p>NAR System (10): Section 3.1, pp. 41 to 42</p> <p>Box Furnace (14): Section 3.16, p. 76</p> <p>Oxidation Furnace #1 (15): Section 3.16, pp. 77 to 78</p> <p>Plant 8 Warehouse - Bldg. 80 (29): Section 3.38, pp. 108 to 109</p> <p>UNH Tanks - North of Plant 2 (47): Section 3.1, pp. 42 to 43</p> <p>UNH Tanks - Southeast of Plant 2 (48): Section 3.23, p. 88</p> <p>UNH Tanks - Digestion Area (49): Section 3.1, pp. 44 to 45</p>

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<p>3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6) - Continued</p>	<p>FINAL Laboratory Complex Implementation Plan, April 2002</p> <p>FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002</p> <p>OU5 FINAL Sitewide Excavation Plan, July 1998</p> <p>OU5 Integrated Remedial Design Packages for Individual Remediation Areas:</p> <p>Area 1, Phase II Supplemental Characterization Package, April 1999</p> <p>FINAL Implementation Plan for Area 3A/4A, May 2001</p> <p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p> <p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>Plot Plant Warehouse - Bldg. 68 (33): Section 3.4, pp. 37 to 38</p> <p>CP Warehouse - Building 56 (19): Section 3.3, pp. 35 to 37</p> <p>Plant 1 Pad Components (20): TS-4: Section 3.5, pp. 39 to 40 TS-5: Section 3.6, pp. 41 to 42 TS-6: Section 3.7, pp. 42 to 43</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>Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: 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>Storage Pad North of Plant 6 (36): Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19</p> <p>Fire Training Facility (11): Section 4.2, At- and Below-Grade Structure Demolition, pp. 4-5 to 4-6; Section 4.3, Soil Excavation, Monitoring and Segregation, pp. 4-6 to 4-10; Section 4.4, Impacted Material Management, pp. 4-10 to 4-12</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Section 3.6-2, HWMUs and USTs, pp. 3-22 to 3-24; Section 3.7, Impacted Material Management, pp. 3-28 to 3-29</p>

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<p>3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6) - Continued</p>	<p>FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005</p>	<p>Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4.2, HWMUs and UTSS, pp. 3-6 to 3-7; Section 3.4.3.4, Waste Pit 4, pp. 3-8 to 3-9; Section 3.4.3.5, Waste Pit 5, p. 3-9</p>
<p>4. Schedule for Closure (Closure Guidance Item 3.7)</p>	<p>OU1 FINAL Remedial Action Work Plan, January 1997</p> <p>OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997</p> <p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement</p> <p>FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996</p> <p>FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997</p> <p>FINAL Misc. Small Structures Implementation Plan, October 1998</p> <p>FINAL Implementation Document for HWMUs #28 and #50, December 1998</p> <p>FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999</p> <p>FINAL Multi-Complex Implementation Plan, October 2001</p> <p>FINAL Laboratory Complex Implementation Plan, April 2002</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> <p>Accelerated Schedule for Conducting Safe Shutdown Activities at D&D Complexes: Figure 6-1, p. 6-3</p> <p>Schedule for Submitting D&D Packages: Table 6-1, p. 6-7</p> <p>Schedule for Removing & Decontaminating Above-Grade Unit Structures and Equipment: To be Submitted for Each D&D Complex</p> <p>Plant 1 Storage Bldg. - Bldg. 67 (25) Figure 4-1, p. 48</p> <p>Plant 9 Warehouse - Bldg. 81 (35) Figure 4-1, p. 43</p> <p>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</p> <p>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</p> <p>Plant 6 Warehouse - Bldg. 79 (37): Figure 4-1, p. 42</p> <p>NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Building 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49): Figure 4-1, p. 112</p> <p>Pilot Plant Warehouse - Bldg. 68 (33): Section 4.0, p. 41</p>

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4. Schedule for Closure (Closure Guidance Item 3.7) - Continued	GERCLA DOCUMENT	CROSS-REFERENCE INDEX
	<p>FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002</p> <p>OU5 FINAL Remedial Design Work Plan, August 1996</p> <p>OU5 FINAL Sitewide Excavation Plan, July 1998</p> <p>OU5 Integrated Remedial Design Packages for Individual Remediation Areas</p> <p>Area 1, Phase II Supplemental Characterization Package, April 1999</p> <p>FINAL Implementation Plan for Area 3A/4A, May 2001</p> <p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p> <p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>CP Warehouse - Building 56 (19), TS-4, 5, and 6 (component of Plant 1 Pad) (20): Figure 4-1, p. 46</p> <p>Schedule for Submitting Remedial Design Documents for Soil: Table 4-1, p. 4-6</p> <p>Schedule for Submitting Remedial Design Documents: Table 1-5</p> <p>Area/Project-Specific Schedules:</p> <p>Sludge Drying Beds (41) — Sector 3D: Table 7-3</p> <p>Storage Pad North of Plant 6 (36) — Area 4A: Table 6-3</p> <p>Fire Training Facility (1): Table 7-3</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Table 6-3</p>
5. Health and Safety Issues (Closure Guidance Item 3.9)	<p>OU1 FINAL Remedial Action Documents Package, April 1999</p> <p>OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997</p> <p>OU5 FINAL Sitewide Excavation Plan, July 1998</p> <p>OU5 Integrated Remedial Design Packages for Individual Remediation Areas</p> <p>Area 1, Phase II Integrated Remedial Design Package, September 1998</p> <p>FINAL Implementation Plan for Area 3A/4A, May 2001</p> <p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p>	<p>Health and Safety Plan</p> <p>Health and Safety Plan: Appendix E</p> <p>Health and Safety Plan: Section 6.0, Project Health and Safety; Table 6-1, Occupational Monitoring and Action Levels</p> <p>Area/Phase-Specific Health and Safety Requirements:</p> <p>Sludge Drying Beds (41): Section 5.0, Project Specific Health and Safety</p> <p>Storage Pad North of Plant 6 (36): Section 5.0, Project Specific Health and Safety</p> <p>Fire Training Facility (1): Section 6.0, Project-Specific Health and Safety</p>

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<p>5. Health and Safety Issues (Closure Guidance Item 3.9) - Continued</p>	<p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22); Section 5.0, Project-Specific Health and Safety</p>
<p>6. Decontamination Efforts (Closure Guidance Item 3.10)</p>	<p>OU 1 FINAL OU 1 Complex Implementation Plan, September 2004</p> <p>OU 3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997</p> <p>OU 3 Implementation Plans for Above-Grade Decontamination and Dismantlement</p> <p>FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996</p> <p>FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997</p> <p>FINAL Misc. Small Structure Implementation Plan, October 1998</p> <p>FINAL Implementation Document for HWMUs #28 and #50, December 1998</p> <p>FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999</p>	<p>Decontamination and Demolition of Buildings and Equipment Used to Support OU 1 Remedial Action (OU 1 includes Waste Pits 4 (27) and 5 (42))</p> <p>HWMU Decontamination: Section 3.2.3, p. 3-13.</p> <p>HWMU Remediation: Section 3.5.3, pp. 3-69 to 3-73 (use of Safe Shutdown, D&D of Complexes)</p> <p>Decontamination of Above-Grade Unit Structures and Equipment: To be Submitted for Each D&D Complex</p> <p>Plant 1 Storage Bldg. - Bldg. 67 (25): HWMU Decontamination: Section 3.7, pp. 42 to 45</p> <p>Materials Management: Table 2-1, p. 12</p> <p>Plant 9 Warehouse - Bldg. 81 (35): HWMU Decontamination: Section 3.13, pp. 39 to 40</p> <p>Materials Management: Table 2-4, p. 12</p> <p>Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37</p> <p>KC-2 Warehouse - Bldg. 63 (34) Section 3.23, pp. 42 to 43</p> <p>UNH Tanks - NFS Storage Area (46): Section 3.1, pp. 23 to 24</p> <p>Trane Incinerator (28): HWMU Decontamination</p> <p>UNH Tanks - Raffinate Bldg. (50): HWMU Decontamination</p> <p>Plant 6 Warehouse - Bldg. 79 (37): Section 3.9, p. 37</p>

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6. Decontamination Efforts (Closure Guidance Item 3.10) - Continued	CLOSURE PLAN COMPONENT ¹ CERCLA DOCUMENT	CROSS-REFERENCE INDEX
	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10): Section 3.1, pp. 40 to 41
		Box Furnace (14): Section 3.16, p. 76
		Oxidation Furnace #1 (15): Section 3.16, pp. 77 to 78
		Plant 8 Warehouse - Bldg. 80 (29): Section 3.38, p. 108
		UNH Tanks - North of Plant 2 (47): Section 3.1, pp. 42 to 43
		UNH Tanks - Southeast of Plant 2 (48): Section 3.23, pp. 87 to 88
	FINAL Laboratory Complex Implementation Plan, April 2002	UNH Tanks - Digestion Area (49): Section 3.1, pp. 44 to 45
	FINAL Plant 1 Complex - Phase II Implementation Plan, August 2002	Pilot Plant Warehouse - Bldg. 68 (33): Section 3.4, pp. 37 to 38
	OU5 FINAL Sitewide Excavation Plan, July 1998	CP Warehouse - Building 56 (19): Section 3.3, p. 36
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Plant 1 Pad Components (20): TS-4: Section 3.5, p. 39
	Area 1, Phase II Supplemental Characterization Package, April 1999	Decontamination of Excavation Equipment: Section F.2.3, Installation of Decontamination and Wash Facilities
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Area/Phase-Specific Requirements for Decontamination of Excavation Equipment: Sludge Drying Beds (41): Equipment Decontamination: Section 5.2, Loading and Hauling, pp. 5-2 to 5-3
	FINAL Implementation Plan for Area 3A/4A, May 2001	Sludge Drying Beds (41): Remediation-Generated Water Management: Section 3.4.4, Remediation-Generated Wastewater Management, pp. 3-33 to 3-35

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<p>6. Decontamination Efforts (Closure Guidance Item 3.10) - Continued</p>	<p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p> <p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>Fire Training Facility (1): Section 4.1.4, Support Facilities, pp. 4-2 to 4-3</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Section 3.4.3.5, Haul Routes, p. 3-15; Appendix A, Section 5.7, Equipment and Personnel Monitoring Decontamination, p. 14</p>
<p>7. Remediation Standards for Soils and Groundwater² (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13)</p>	<p>OU1 FINAL Record of Decision, January 1995</p> <p>OU1 Remedial Design Pre-Final Design Package II, March 1996</p> <p>OU5 FINAL Record of Decision, January 1996</p> <p>OU5 FINAL Sitewide Excavation Plan, July 1998</p> <p>OU5 Integrated Remedial Design Packages for Individual Remediation Areas</p> <p>Area 1, Phase II Supplemental Characterization Package, April 1999</p> <p>FINAL Implementation Plan for Area 3A/4A, May 2001</p> <p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p>	<p>Waste Pit (27, 42) Area: pp. 9-1 to 9-11 Tables B-5 to B-16</p> <p>Waste Pit (27, 42) Area: pp. A-3 to A-7</p> <p>Final Remediation Levels (FRLs) for Soil and Groundwater: Table 9-3, p. 9-23 Table 9-4, p. 9-26</p> <p>Summary of Contaminant Levels Pertinent to Soil Remediation at the FCP: 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</p> <p>Area/Phase-Specific FRLs:</p> <p>Sludge Drying Beds (4.1): 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</p> <p>Storage Pad North of Plant 6 (36): Soil Final Remediation Levels for HWMUs and USTs, Table 2-6</p> <p>Fire Training Facility (1): Soil Final Remediation Levels, Table 3-3</p>

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<p>7. Remediation Standards for Soils and Groundwater² (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13) - Continued</p>	<p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22); Soil Final Remediation Levels, Table 2-3</p>
<p>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</p>	<p>FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005</p>	<p>Waste Pit 4 (27), Waste Pit 5 (42); Table 2-3, p. 2-17</p>
	<p>OU1 FINAL Remedial Investigation Report, August 1994</p>	<p>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</p>
	<p>OU1 FINAL Remedial Action Documents Package, April 1999</p>	<p>Procedures for Sampling and Analysis of Waste Pit Area: Certification of Waste Pit Area Cleanup: Sampling and Analysis Plan</p>
	<p>OU5 FINAL Remedial Investigation Report, March 1995</p>	<p>Procedures for Determining Nature and Extent of Soil Contamination: Chapter 2, pp. 2-1 to 2-83</p>
	<p>OU5 FINAL Sitewide Excavation Plan, July 1998</p>	<p>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</p>
	<p>OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas</p>	<p>Area/Phase-Specific Procedures for Certifying FRL Attainment:</p>
	<p>Area 1, Phase II Supplemental Characterization Package, August 1998</p>	<p>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</p>
	<p>FINAL Implementation Plan for Area 3A/4A, May 2001</p>	<p>Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-12; Section 3.3.3, HMMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19</p>
	<p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p>	<p>Fire Training Facility (1): Section 3.6, Excavation Boundaries, p. 3-10; Section 4.6, Precertification and Interim Grading, p. 4-13</p>
	<p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22); Section 2.6, Excavation Boundaries, pp. 2-20 to 2-27; Section 3.9, Precertification And Interim Grading, p. 3-31</p>

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<p>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 - Continued</p>	<p>FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005</p> <p>OU5 Certification Design Letters for Individual Remediation Areas</p> <p>FINAL Certification Design Letter for Area 1, Phase II, October 1999</p> <p>FINAL Certification Design Letter for Area 6, Phase I, May 2003</p> <p>FINAL Certification Design Letter for Area 3A and Area 3B, August 2004</p> <p>FINAL Certification Design Letter and Certification Project Specific Plan for Area 4B - Part One (Revision 1), September 2005</p> <p>DRAFT Certification Design Letter and Certification Project Specific Plan for Area 6 Waste Pits 4, 5, and 6, November 2005</p>	<p>Waste Pit 4 (27), Waste Pit 5 (42): Section 2.0, Pre-design Investigations and Characterization Data; Section 3.8, Pre-certification, p. 3-16</p> <p>Area/Phase-Specific Procedures for Certifying FRL Attainment:</p> <p>Sludge Drying Beds (41): Section 4.1, Certification Design, pp. 4-1 to 4-5; Section 4.3, Sampling, pp. 4-6 to 4-7</p> <p>Fire Training Facility (1): Section 4.0, Certification Approach, pp. 4-1 to 4-3</p> <p>Plant 1 Pad (20): Section 4.0, Certification Approach, pp. 4-1 to 4-6</p> <p>Drum Storage Area Near Lab Loading Dock (4); Plant 8 West Pad (18), Trane Incinerator (28), UNH Tanks - NFS Storage Area (46), UNH Tanks - North of Plant 2 (47), UNH Tanks - Digestion Area (49), UNH Tanks - Raffinate Building (50): Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-8; Section 4.0, Certification Approach, pp. 4-1 to 4-10</p> <p>Waste Pit 4 (27), Waste Pit 5 (42): Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-7; Section 4.0, Certification Approach, pp. 4-1 to 4-10</p>
<p>9. Description of Removal Efforts and Treatment Processes (Closure Guidance Item 3.15)</p>	<p>OU1 FINAL Remedial Design Documents Package, August 1998</p> <p>OU1 FINAL Remedial Action Documents Package, April 1999</p> <p>OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement</p> <p>OU5 FINAL Feasibility Study Report, June 1995</p>	<p>Removal and Handling of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan</p> <p>Processing of Waste Pit Waste - Waste Pit 4 (27), Waste Pit 5 (42): Operations and Maintenance (O & M) Plan for Remediation Facilities</p> <p>Removal and Treatment of Waste in HWMU: To be Submitted for Each D&D Complex (where applicable)</p> <p>Evaluation of Technologies and Process Options: Section 3.3, p. 3-5</p>

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9. CLOSURE PLAN COMPONENT ¹	Description of Removal Efforts and Treatment Processes (Closure Guidance Item 3.15) - Continued	GERCLA DOCUMENT ¹	CROSS-REFERENCE INDEX
10. Landfill Closure Requirements - (if applicable) ³ - (Closure Guidance Item 3.16)		<p>OU5 FINAL Record of Decision, January 1996</p> <p>OU1 FINAL Remedial Design Work Plan, June 1995</p> <p>OU1 FINAL Excavation Plan for Area 6 Waste Pits and General Area, October 2005</p> <p>OU1 FINAL Record of Decision, January 1995</p> <p>OU5 FINAL Record of Decision, January 1996</p>	<p>Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material:</p> <p>Section 2.0; Remediation Issues and General Strategies; Section 3.0; General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Site-wide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Site-wide Extent of Contamination by Constituent</p> <p>Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material:</p> <p>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</p> <p>Storage Pad North of Plant 6 (36): Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19</p> <p>Fire Training Facility (1): Section 4.2, At- and Below-Grade Structure Demolition, pp. 4-5 to 4-6; Section 4.3, Soil Excavation, Monitoring and Segregation, pp. 4-6 to 4-10; Section 4.4, Impacted Material Management, pp. 4-10 to 4-12</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Section 3.6.2, HWMUs and USTs, pp. 3-22 to 3-24; Section 3.7, Impacted Material Management, pp. 3-28 to 3-29</p> <p>Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4, Remedial Excavation, pp. 3-5 to 3-9</p> <p>ARARs: Relevant and Appropriate as some remedial alternatives may require closure to these standards Tables B-28 and B-29</p> <p>Revised ARARs: Tables A-24 and A-25</p>
			<p>Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure¹: ARARs: Table B-3, p. B-3-10</p>

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<p>10. Landfill Closure Requirements – (if applicable)³ - (Closure Guidance Item 3.16j) - Continued</p>	<p>OU5 Integrated Remedial Design Packages for Individual Remediation Areas</p> <p>Area 1, Phase II Integrated Remedial Design Package, September 1998</p> <p>FINAL Implementation Plan for Area 3A/4A, May 2001</p> <p>FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003</p> <p>FINAL Implementation Plan for Area 3B/4B/5, February 2004</p>	<p>Area/Phase-Specific Landfill Closure Requirements:</p> <p>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.</p> <p>Storage Pad North of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.</p> <p>Fire Training Facility (1): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, But not anticipated to be applicable since HWMU to be clean (risk-based) closed by Removal</p> <p>Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, But not anticipated to be applicable since HWMUs are to be clean (risk-based) closed by Removal</p>
<p>11. Certification (Closure Guidance Item 3.18)</p>	<p>OU1 Remedial Action Report</p> <p>OU1 DRAFT Operable Unit 1 Complex Project Completion Report, October 2005</p> <p>OU3 Project Completion Reports</p> <p>FINAL Plant 1 Complex – Phase 1 Project Completion Report, December 1997</p> <p>FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999</p> <p>FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999</p>	<p>Summary of HWMU Remediation Activities/Certification Sampling Results: To be Submitted</p> <p>Summary of D&D Activities Completed for Buildings and Equipment Used to Support OU1 Remedial Action (OU1 includes Waste Pits 4 (27) and 5 (42))</p> <p>Summary of HWMU Remediation Activities: To be Submitted for Each D&D Complex</p> <p>Plant 1 Storage Bldg. – Bldg. 67 (25): Section 2.1.3, pp. 7 to 8</p> <p>Plant 9 Warehouse – Bldg. 81 (35): Section 2.2.11, pp. 12 to 14</p> <p>Trane Incinerator (28); UNH Tanks – Raffinate Building (50)</p>

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11. Certification (Closure Guidance Item 3.18) - Continued	FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999 FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #464 Completion Report, December 2000 FINAL Plant 1 Complex - Phase II Project Completion Report, November 2003 FINAL Laboratory Complex Project Completion Report, July 2004 FINAL Multi-Complex Project Completion Report, July 2004 FINAL Pilot Plant Complex Project Completion Report, September 2004 FINAL East Warehouse Complex Project Completion Report, June 2005 OU3 Remedial Action Report OU5 Certification Reports for Individual Remediation Areas: FINAL Certification Report for Area 1, Phase II, October 2000	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 2.3, pp. 3 to 5 KC-2 Warehouse - Bldg. 63 (34) Section 2.4, pp. 5 to 6 UNH Tanks - NFS Storage Area (46): Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46 Decontamination, p. 4 CP Warehouse - Building 56 (19): Section 2.2.4, pp. 5 to 6 Plant 1 Pad Components (20): TS-4: Section 2.2.6, pp. 6 to 7 TS-5: Section 2.2.7, p. 7 TS-6: Section 2.2.8, pp. 7 to 8 Section 3.0, Material Management, pp. 8 to 9 Pilot Plant Warehouse (33): Section 2.2.4, pp. 6 to 7 NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Bldg. 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49): Section 3.0, HWMU Closure Tasks, pp. 24 to 35 Tank T-2 (54): Section 3.0, HWMU Closure Tasks, p. 9 Plant 6 Warehouse (37): Section 3.0, HWMU Closure Tasks, pp. 5 to 6 Certification of Conformance with Requirements and Standards: To be Submitted Area/Phase-Specific Certification Reports (Summary of Remedial Activities/Certification Sampling Results): Sludge Drying Beds (41): Section 2.1.5.3, Sector 3 Certification Units, pp. 2-9 to 2-11; Section 2.3, Statistical Analysis, pp. 2-12 to 2-13; Section 3.1, Excavation Activities, p. 3-1; Section 3.2, Changes to Scope of Work, pp. 3-3 to 3-5; Section 5.2, Sludge Drying Bed HWMU Closure, p. 5-3

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11. Certification (Closure Guidance Item 3.18) - Continued	FINAL Certification Report for Area 6, Phase I - Part 2, March 2004 FINAL Certification Report for Area 3A and Area 3B, February 2005 DRAFT Certification Report for Area 4B - Part One, November 2005	Fire Training Facility (1): Section 2.2, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions Plant 1 Pad (20): Section 2.0, Certification Approach, pp. 2-1 to 2-14; Section 3.1.2, Overview of Field Activities - Area 3B, pp. 3-3 to 3-4; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction, pp. 4-1 to 4-6; Section 5.1.2, Certification Results and Evaluation - A3B-HWMU 20, pp. 5-9 to 5-10; Section 5.2, Areas 3A and 3B Certification Conclusions, p. 5-10 Drum Storage Area Near Lab Loading Dock (4), Plant 8 West Pad (18), Trane Incinerator (28), UNH Tanks - NFS Storage Area (46), UNH Tanks - North of Plant 2, (47), UNH Tanks - Digestion Area (49), UNH Tanks - Raffinate Building (50): Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions Certification 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 OU3 FINAL Record of Decision for Interim Remedial Action, June 1994 OU3 Final Record of Decision for Final Remedial Action, September 1996 OU5 FINAL Record of Decision, January 1996 OU5 FINAL Sitewide Excavation Plan, July 1998 OU5 Certification Reports for Individual Remediation Areas	Status of Waste Pits After OU1 Remedial Action: pp. 10-1 to 10-9 Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11 Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9 Status of FCP After Soil and Groundwater Remediation: Section 4.0, p. 4-1 Certification Reports: Section 7.4, pp. 7-10 to 7-14 Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted (if required)

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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.

³ 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 FCP 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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