OhioEPA
State of Ohio Environmental Protection Agency

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J-2136

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CERTIFIED MAIL

June 6, 1996

Re: **Director's Final Findings & Orders**
U.S. Department of Energy
Cincinnati, Ohio
U.S. EPA ID No: OH6890008976

Mr. Phil Hammric
U.S. Department of Energy
Fernald Environmental Management Project
P.O. Box 389705
Cincinnati, Ohio 45239

Mr. John Bradburne
Fernald Environmental Restoration Corporation
P.O. Box 538704
Cincinnati, Ohio 45253-8704

Dear Mr. Hammric and Mr. Bradburne:

Transmitted herewith are Final Findings and Orders of the Director concerning the matter indicated above.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

wp61.TEC.lcn.c:doeltr

cc: Michael Savage, Asst. Chief, DHWM
Mark Navarre, Legal Supervisor
Paul Pardi, DHWM, SWDO
Dave Wertz, DHWM, NEDO
Don Marshall, DHWM, SWDO
Steve Hamlin, DHWM, SEDO
Pamela Allen, Mgr., CAS, DHWM
Julianne Kurdila, Legal
Carol Hester, PIC
Chuck Hull, DHWM, NWDO
Steve Rath, DHWM, CDO

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

U.S. Department of Energy	:	Director's Final
Fernald Environmental	:	Findings and Orders
Management Project	:	
P.O. Box 389705	:	
Cincinnati, Ohio 45239	:	

Fernald Environmental Restoration Corporation
P.O.Box 538704
Cincinnati, Ohio 45253-8704

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PREAMBLE

It is hereby agreed by and among the Parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to the U.S. Department of Energy ("Respondent") and the Fernald Environmental Restoration Management Corporation ("FERMCO") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") in Ohio Revised Code ("ORC") Sections 3734.02(G) and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon the Respondent and its agents, assigns, and successors in interest, and upon the

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By: Mary Cavin Date JUN - 5 1996

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Respondent's co-operator FERMCO and its successors in interest. No change in ownership or operation of the Facility will in any way alter the Respondent's responsibilities under these Orders.

III. DEFINITIONS

Words used in these Orders shall have their ordinary meaning, except as defined in this section or the relevant statute or regulation.

a. "Site" shall mean all areas within the property boundary of the Fernald Environmental Management Project ("FEMP") and any other areas that received or potentially received or released "hazardous substances, pollutants, or contaminants" originating from the FEMP as defined in the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, ("CERCLA"), 42 U.S.C. Section 9601, et seq..

b. "Hazardous Waste Management Unit" ("HWMU") shall mean a contiguous area of land on or in which hazardous waste is placed or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area (40 CFR 260.10, Ohio Administrative Code ("OAC") rule 3745-50-10).

IV. FINDINGS OF FACT

The Director of the Ohio EPA has determined the following findings of fact:

1. The Respondent owns and operates a former industrial facility located approximately twenty (20) miles northwest of

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Cincinnati, Ohio, in Hamilton and Butler Counties ("Facility"). The Facility, as part of the Site, is presently listed on the U.S. EPA's National Priorities List pursuant to CERCLA. The Facility is a "facility" within the meaning of Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9), and within the meaning of ORC Section 3734.01(N).

2. The Respondent is a "person" as defined in ORC Sections 1.59 and 3734.01(G) and OAC rule 3745-50-10. The Respondent is the "owner" of the Facility as defined in OAC rule 3745-50-10.

3. The Respondent generates or has generated "hazardous waste" as that term is defined in Section 1003(5) of the Solid Waste Disposal Act, as amended by Resource Conservation and Recovery Act ("RCRA") as amended, 42 U.S.C. Section 6904(5) and in ORC Section 3734.01(J) and OAC rule 3745-51-03.

4. The Respondent notified U.S. EPA on August 8, 1980 of its hazardous waste activity at the Facility and was issued U.S. EPA Identification Number OH6890008976.

5. The Respondent engaged or engages in the "storage" of "hazardous waste", as those terms are defined in ORC section 3734.01, OAC rule 3745-50-10, and OAC Chapter 3745-51. This hazardous waste was generated during past production activities and includes, but is not limited to: ignitable and corrosive liquids and sludges; reactive liquids and sludges; toxic liquids, sludges, and debris; spent solvents; and various waste laboratory chemicals. On December 2, 1988, the Respondent entered into a consent decree with Ohio EPA that authorizes this hazardous waste storage activity.

6. The Respondent has submitted RCRA "Part A" and "Part B"

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hazardous waste facility permit applications with numerous revisions to U.S. EPA and/or Ohio EPA. Respondent submitted the most recent "Part B" revision to Ohio EPA on September 15, 1994. These applications address the hazardous waste storage activities referenced in Finding number 5 of these Orders. This hazardous waste storage activity will cease after RCRA closure of the Facility is performed under these Orders. When this storage activity ceases, the Respondent's obligation to have a hazardous waste facility installation and operation permit also will cease, unless post-closure care of the Facility becomes necessary.

7. The U.S. EPA entered into a Federal Facility Compliance Agreement with the Respondent on July 18, 1986 that requires Respondent to conduct a CERCLA Remedial Investigation and Feasibility Study ("RI/FS") at the site. An objective of the RI/FS process is to characterize the nature, rate, and extent of contaminant migration at the site to the extent necessary to select a response action. During the RI/FS, the Respondent is required to make reasonable efforts to determine whether CERCLA hazardous substances at the site qualify as RCRA hazardous wastes. The Respondent's efforts to ascertain the volumes and locations of RCRA hazardous wastes will be documented in the Respondent's primary CERCLA documents. Ohio EPA is actively participating in the RI/FS process at the Site through project meetings and active review of RI/FS documents. The Respondent has acted on the Ohio EPA comments and has incorporated them into the RI/FS documents accordingly.

8. On December 19, 1988, Ohio EPA and the Respondent entered into a "Stipulation and Settlement Agreement" for issues regarding Waste Pit No.4 that were pending before the Ohio Environmental Board of Review, EBR Case No. EBR 311831. Waste Pit No. 4 is

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listed on Attachment A of these Orders.

9. On June 29, 1990, the U.S. EPA and the Respondent entered into a Consent Agreement which was amended on September 20, 1991 ("ACA"). The ACA details the Respondent's remedial obligations under CERCLA.

10. On January 22, 1993, Ohio EPA and the Respondent amended the consent decree referenced in Finding number 5 of these Orders by entering into a Stipulated Amended Consent Decree ("SACD") which addresses closure of two HWMUs at the Facility, specifically the Plant No. 1 Pad and Pit No. 5, both of which are listed on Attachment A to these Orders.

11. Ohio EPA and the Respondent desire to avoid duplication of efforts at the Facility and to integrate the Ohio EPA RCRA hazardous waste closure requirements into the remediation requirements of CERCLA as detailed in the ACA.

12. The CERCLA process being conducted at the Facility employs an "Operable Unit" management concept. The HWMUs identified at the Facility are HWMUs within the scope of Operable Units 1 (waste pit area) and 3 (production area). Operable Unit 5 is all contaminated environmental media associated with the Site, including that media adjacent to and underlying HWMUs at the Facility.

13. Attachment A, incorporated by reference herein, contains those HWMUs that Respondent intends to close utilizing a CERCLA/RCRA integrated process. All HWMUs in Attachment A are located in the Operable Units identified in Finding 12 of these Orders.

14. The HWMUs identified in Attachment A are subject to schedules for investigation and remediation in the ACA. These schedules are based upon discussions between the Respondent and U.S. EPA in consultation with Ohio EPA. Remedial actions proposed in

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accordance with the ACA were subject to a public comment period in accordance with the CERCLA process.

15. Attachment B, incorporated by reference herein, contains those HWMUs that Respondent intends to close in accordance with Ohio EPA hazardous waste closure requirements contained in OAC rules 3745-66-10 through 3745-66-15 and in accordance with a schedule contained herein.

16. Consistent with CERCLA, the Respondent will present proposed plans for remediation of each of the Operable Units describing the range of remedial alternatives considered. These plans will be subject to review and comment by U. S. EPA, Ohio EPA and the public. Following consideration of public comment and in consultation with Ohio EPA, U.S. EPA will select a remedy and issue a Record of Decision for each Operable Unit. The Respondent has agreed to implement the remedies selected in the RODs for each Operable Unit.

17. Pursuant to ORC Section 3734.02(G) and OAC rule 3745-50-31, the Director may by order exempt any person generating, storing, treating, disposing of or transporting hazardous waste in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or license, comply with the manifest system or with the requirements of ORC Chapter 3734.

18. If the Respondent conducts an integrated CERCLA/RCRA closure process in accordance with the requirements and schedules contained in these Orders, it is unlikely that public health or safety or the environment will be adversely affected.

19. If the Respondent conducts an integrated CERCLA/RCRA closure

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By: Maria Cavin Date JUN - 6

process in accordance with the requirements and schedules contained in these Orders, the Respondent will cease the hazardous waste storage activity detailed in the Respondent's RCRA "Part A" and "Part B" hazardous waste facility installation and operation permit applications and referenced in Finding numbers 5 and 6 of these Orders. The cessation of such storage activity will negate the need for Respondent to obtain a final RCRA hazardous waste facility installation and operation permit.

20. It is unlikely that the public health or safety or the environment will be adversely affected by the Respondent not obtaining a final RCRA hazardous waste facility installation and operation permit prior to or during the RCRA/CERCLA integrated closure process addressed in these Orders.

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V. ORDERS

1. The Respondent and FERMCO shall comply with the closure regulations contained in OAC rules 3745-66-11(A) and (B), 3745-66-11(C) as applicable, 3745-66-14, and 3745-66-16 through 3745-66-20 as applicable for the HWMUs listed in Attachment A. Attachment A may be modified upon written approval of the Division of Hazardous Waste Management.

2. The Respondent and FERMCO are hereby exempted from complying with OAC rule 3745-66-12 for the HWMUs identified in Attachment A of these Orders, provided that the Respondent:

   a. submits the documents contained in Attachment C to Ohio EPA in accordance with the dates established pursuant to the ACA. Within one week after submitting these documents to Ohio EPA, the Respondent shall submit a

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cross-reference index which contains pertinent page and sections identifications for each HWMU that is contained in the documents and said index shall be cumulative and reference all previous document locations. The Respondent shall respond in writing to Ohio EPA's comments on these documents within thirty (30) days of receipt of such comments. This response period may be extended for a period not to exceed twenty (20) days upon written approval of the Ohio EPA, Southwest District Office;

b. establishes that post-remedial levels for constituents of concern from HWMUs listed in Attachment A are consistent with the Director's performance standards for closure of hazardous waste facilities;

c. submits, for Ohio EPA and public review and comment, the proposed plans to remediate the operable units which incorporate the remediation levels established in accordance with Order 2b of these Orders; and

d. implements the final remedies as reflected in the Records of Decision issued in accordance with the ACA.

3. For the HWMUs identified in Attachment A of these Orders, the Respondent and FERMCO are hereby exempted from complying with OAC rule 3745-66-13 provided that they comply with the schedule contained in Attachment A.

4. For the HWMUs identified in Attachment A of these Orders, the Respondent and FERMCO are hereby exempted from complying with OAC rule 3745-66-15 provided that they submit Remedial Action Reports for the HWMUs contained in operable units 1, 3, and 5 within sixty (60) days from completion of remedial activities

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at each operable unit, which completion is determined by the U.S. EPA, in accordance with CERCLA. These Remedial Action Reports shall certify that the HWMUs contained in operable units 1 and 3 have been closed, and that the environmental media in operable unit 5 has been managed, in accordance with the final remedies contained in the Records of Decision and in accordance with the Director's closure performance standards. Attachment C summarizes the documents that will be provided during remediation process. These CERCLA documents contain the substantive requirements of the RCRA and Ohio hazardous waste closure regulations.

5. Within thirty (30) days from the effective date of these Orders, the Respondent shall request withdrawal of all closure plans and closure plan information data packages submitted to Ohio EPA for the HWMUs listed in Attachment A.

6. For the HWMUs identified in Attachment B of these Orders, the Respondent and FERMCO shall comply with OAC rules 3745-66-10 through 3745-66-12, 3745-66-14, 3745-66-15, and 3745-66-16 through 3745-66-20 as applicable.

7. For the HWMUs identified in Attachment B of these Orders, the Respondent is hereby exempted from complying with OAC rule 3745-66-13 provided that the Respondent complies with the schedules contained in the final approved closure plans for each of these HWMUs. Attachment B may be modified upon written approval of Ohio EPA, Division of Hazardous Waste Management.

8. Compliance with these Orders will satisfy the requirements of the "Stipulation and Settlement Agreement" regarding the submission of a plan for final closure of Waste Pit No. 4, entered into between Ohio EPA and the Respondent in EBR Case

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No. 311831 and referenced in Finding number 8 of these Orders. Closure of Waste Pit No. 4, which is listed in Attachment A of these Orders, will continue under the terms and conditions of these Orders.

9. The Respondent and FERMCO are hereby exempted from those portions of ORC Section 3734.02, ORC Section 3734.05, and OAC Chapter 3745-50 which require them to obtain a hazardous waste facility installation and operation permit for the hazardous waste storage activities described in Finding number 5 of these Orders and in Respondent's RCRA "Part B" permit application currently pending before Ohio EPA (as revised September 15, 1994), provided that the Respondent and FERMCO comply with the terms of that permit application and all other applicable hazardous waste laws and regulations, unless otherwise specifically provided for in these Orders. The RCRA "Part B" permit application may be revised upon written approval of the Ohio EPA Division of Hazardous Waste Management. This exemption shall terminate if Ohio EPA determines that post-closure care of Respondent's HWMUs is necessary and notifies the Respondent in writing of such determination.

10. The Respondent and FERMCO, by their acceptance of these Orders, agree to comply with all conditions of these Orders. The Respondent and FERCMO acknowledge that reasons for revocation of the Orders include, but are not limited to, noncompliance with the Orders and/or a determination that such revocation is necessary to protect public health or safety or the environment.

VI. MODIFICATIONS

Except as otherwise provided herein, these Orders may be

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modified only upon the written request of the Respondent and written approval of the Director or upon written notification to the Respondent from the Director. This notification shall set forth the nature and basis for any modifications.

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VII. RESERVATION OF RIGHTS

Nothing herein shall be construed as restricting any rights or obligations contained in the ACA between Respondent and U. S. EPA. Nothing herein restricts the right of Ohio EPA to seek legal or equitable relief to enforce the terms of these Orders or to require additional activities at the Facility. Nothing herein shall be construed as an admission by Respondent or FERMCO, or otherwise restrict the right of the Respondent or FERMCO, to raise any administrative, legal, or equitable claim or defense with respect to such further actions which the Ohio EPA may seek to require of the Respondent or FERMCO, including but not limited to FERMCO's right to raise the defense that its obligations under the Orders are subject to the receipt of funding from Respondent.

It is the position of Ohio EPA that the federal Anti-Deficiency Act, 31 U.S.C. Section 1341, as amended, does not apply to any obligations set forth in these Orders and that obligations hereunder are unaffected by the Respondent's failure to obtain adequate funds or appropriations from Congress. It is Repondent's position that the obligations set forth in these Orders are subject to the provisions of the Anti-Deficiency Act and are subject to funding availability. The Parties agree that it is premature to raise and resolve the validity of such positions at this time.

VIII. TERMINATION AND SATISFACTION

These Orders shall terminate when the Respondent demonstrates in writing and certifies to the satisfaction of Ohio EPA that all

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By: Marc Cannon Date JUN - 6 19

obligations under these Orders have been performed, and the Ohio EPA, Division of Hazardous Waste Management, acknowledges in writing the Ohio EPA's agreement that work was performed in accordance with the Remedial Action Plans and these Orders.

The certification required under this Section shall be signed by a responsible official of the Respondent. The certification shall make the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate, and complete."

As to FERMCO, all obligations and requirements of these Orders shall cease as of the effective date of the termination of its contract with the U.S. Department of Energy pertaining to Fernald; provided, however, that this section of the Orders does not absolve FERMCO from any liability for any violation which occurs prior to the termination of said contract.

IX. SIGNATORIES

Each signatory to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to this document.

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IT IS SO ORDERED:

Ohio Environmental Protection Agency

BY: Donald R. Schregardus/gas
Donald R. Schregardus
Director

6/4/96
Date

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By: [illegible] JUN - 6 [illegible]

X. WAIVER

The Respondent and FERMCO agree that these Orders are lawful and reasonable and that the schedules provided herein are reasonable. The Respondent and FERMCO agree to comply with these Orders. Compliance with these Orders will satisfy Respondent's and FERMCO's obligations to meet Ohio substantive closure requirements.

Except as provided in Section VII. above, the Respondent and FERMCO hereby waive the right to appeal the issuance, terms, and service of these Orders, and they hereby waive all rights they might have to seek judicial or administrative review of these Orders either in law or equity. The Respondent and FERMCO expressly waive any and all rights they might have to request an adjudication hearing of any proposed revocation of these Orders or to appeal any final action of Director revoking these Orders.

Notwithstanding anything else in this section, the Ohio EPA and the Respondent and FERMCO agree that if any part of these Orders are appealed by any other party to the Environmental Board of Review, or any Court, the Respondent and FERMCO retain the right to intervene and participate in such appeal in support of these Orders. In such event, the Respondent and FERMCO shall continue to comply with these Orders despite such appeal or intervention unless these Orders are stayed, vacated, or modified by the Environmental Board of Review or the Court.

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By: Mary Cavin Date

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IT IS SO AGREED:

U.S. Department of Energy

BY: _____ Date: 4/19/96
Manager, Ohio Field Office
Title

Fernald Environmental Restoration Management Corporation

_____ Date: 5/7/96
~~XXXXXXXXX~~ John Bradburne
President

Ohio Environmental Protection Agency

_____ Date: 6/4/96
Donald R. Schregardus
Director

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Attachment A

Active and Inactive Units to be Closed under CERCLA/RCRA Integrated Process

Unit No.	Description	CERCLA Document(s) Which Addresses Schedule (1)
	Inactive Units	
1	Fire Training Facility	OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
4	Drum Storage Area Near Loading Dock (Lab)	CPID approved by Ohio EPA May 5, 1995
5	Drum Storage Area South of W-26 (Lab)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
10	NAR System Components	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
11	Tank Farm Sump	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
14	Box Furnace	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
15	Oxidation Furnace #1	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
17	Plant 8 East Drum Storage Pad	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
18	Plant 8 West Drum Storage Pad	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
22	Pilot Plant Sump	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
25	Plant 1 Storage Building (67)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
27	Waste Pit 4	OU1 Final Remedial Design Work Plan, July 1995. OU1 Draft Remedial Action Work Plan to be submitted October 22, 1996. OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
28	Trane Incinerator	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.

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By: Date

Attachment A

Active and Inactive Units to be Closed under CERCLA/RCRA Integrated Process

Unit No.	Description	CERCLA Document(s) Which Addresses Schedule (1)
36	Storage Pad North of Plant 6	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
41	Sludge Drying Beds	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
42	Waste Pit 5	OU1 Final Remedial Design Work Plan, July 1995. OU1 Draft Remedial Action Work Plan to be submitted October 22, 1996. OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
46-50	UNH Tanks	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
54	Tank T-2	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
	Active Units	
19	CP Storage Warehouse (Butler Bldg - 56)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995.
20	Plant 1 Storage Pad	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2) OU5 Draft Remedial Design Work Plan submitted March 29, 1996.
29	Plant 8 Warehouse (Bldg 80)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
33	Pilot Plant Warehouse (Bldg 68)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
34	KC-2 Warehouse (Bldg 63)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
35	Plant 9 Warehouse (Bldg 81)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)
37	Plant 6 Warehouse (Bldg. 79)	OU3 Final Prioritization and Sequencing Report submitted June 9, 1995 (2)

(1) Schedules to be established as milestones pursuant to the Amended Consent Agreement with U.S.EPA.

(2) The OU3 Remedial Design Prioritization and Sequencing Report (PSR) is a deliverable to USEPA, and is specified in the OU3 RD/RA Work Plan to meet the intent of the Amended Consent Agreement (ACA).

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By: Marie Cerrin Date JUN - 6 1996

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Attachment B

Inactive Units to be Closed under RCRA

Unit No.	Description	Schedule (1)
3	Waste Oil Storage in Garage	Revised CPID submitted February 17, 1995
6	Drummed HF Residue/Associated Storage Areas in Plant 4	Clean closed April 28, 1995
7	Drummed HF Residue NW of Plant 4	Additional closure documentation submitted June 5, 1995
8	Drummed HF Residue South of Cooling Towers	Clean closed April 13, 1995
9	Nitric Acid Rail Car and area	Clean closed April 25, 1995
13	Wheelabrator Dust Collector	Revised CPID approved by Ohio EPA August 16, 1995
21	Hilco Oil Recovery	Anticipate reclassification from HWMU to SWMU
26	Detrex Still	Revised CPID approved by Ohio EPA July 20, 1995
30	Barium Chloride Treatment Facility	Clean closed April 19, 1990
31,32	Tank for Bulk Storage of Solvents, T-5 & T-6	Certification of closure to be submitted when Tank T-2 waste is removed
38	HF Tank Car	Closure certification submitted September 29, 1995
52	North and South Solvent Tanks (Pilot Plant)	Revised CPID approved by Ohio EPA September 12, 1995
53	Safe Geometry Digestion Sump (Plant 1)	Clean closed February 13, 1995

(1) Closure of HWMUs on Attachment B will be completed within either 180 days from approval of the CPID or within an alternate time frame specified in the approved CPID.

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By: Mary Cavano Date JUN - 6 1996

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ATTACHMENT C

CERCLA DOCUMENTS THAT ADDRESS OHIO EPA SUBSTANTIVE CLOSURE REQUIREMENTS

1. Description/Detailed Drawing of Waste Management Unit(s) to be Closed (Closure Guidance Items 3.2 and 3.4)

   OU1 RI Report for Waste Pits 4 and 5

   OU3 Interim Action RA Work Plan for drawings on underground piping associated with HWMUs

   OU3 Interim Action RD PSR for HWMU locations within D&D complexes

   OU3 Interim Action Implementation Plans for structures and ancillary equipment

   OU5 RI Report for contaminated soil and groundwater

2. List of Hazardous Waste(s) Managed in Units(s) (Closure Guidance Item 3.5)

   OU1 RI Report

   OU3 RI/FS Report

   OU3 Interim Action Implementation Plans

   OU5 RI Report

   OU5 FS Report

3. Removal of Waste (Closure Guidance Item 3.6)

   OU1 RA Work Plan

   OU3 Interim Action RD/RA WP

   OU3 Interim Action Implementation Plans

   OU5 RD Work Plan

   OU5 RA Work Plan

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ATTACHMENT C

CERCLA DOCUMENTS THAT ADDRESS OHIO EPA SUBSTANTIVE CLOSURE REQUIREMENTS

4. Schedule for Closure (Closure Guidance Item 3.7)

   OU1 RA Work Plan for waste pit area

   OU3 Interim Action PSR and Annual Update of Schedule for structures and ancillary equipment

   OU3 Interim Action Implementation Plans for structures and ancillary equipment

   OU5 RD Work Plan for contaminated soil and groundwater

   OU5 RA Work Plan for contaminated soil and groundwater

5. Health and Safety Issues (Closure Guidance Item 3.9)

   OU1 RA Work Plan

   OU3 Interim Action RD/RA Work Plan

   OU5 RA Work Plan

6. Decontamination Efforts (Closure Guidance Item 3.10)

   OU1 RA Work Plan for waste pit area

   OU3 Interim Action RD/RA WP for structures and ancillary equipment

   OU3 Interim Action Implementation Plans for structures and ancillary equipment

   OU5 RA Work Plan for contaminated soils and groundwater

7. Remediation Standards for Soils and Groundwater (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.12)

   OU1 ROD for waste pit area only

   OU1 RD Excavation Plan for waste pit area only

   OU5 ROD

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ATTACHMENT C (Continued)

8. Sampling Plan and Analytical Procedures (Closure Guidance Item 3.13) -- Includes sampling to define the extent of contamination to verify cleanup.

   OU1 RI Report for waste pit area only

   OU1 RA Sampling and Analysis Plan for waste pit area only

   OU1 Final Design Package for waste pit area only

   OU5 RI Report for nature and extent of soil and groundwater contamination

   OU5 RA Work Plan for verifying cleanup

9. Description of Removal Efforts and Treatment Processes (Closure Guidance Item 3.14)

   OU1 RA Work Plan

   OU3 Interim Action Implementation Plans for structures and ancillary equipment

   OU5 FS Report for preliminary discussion of treatability options for contaminated soil and groundwater

   OU5 RA Work Plan for contaminated soils and groundwater and associated equipment used during removal and treatment

10. Landfill Closure Requirements (if applicable) (Closure Guidance Item 3.15)

   OU1 ROD

   OU1 RD Work Plan

   OU1 RA Work Plan

   OU5 ROD

   OU5 RD Work Plan

   OU5 RA Work Plan

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ATTACHMENT C (Continued)

11. Certification (Closure Guidance Item 3.16)

    OU1 RA Report

    OU3 RA Report

    OU5 RA Report

12. Status of Facility (or Unit) After Closure (Closure Guidance Item 3:17)

    OU1 ROD

    OU3 ROD for Interim Action

    OU5 ROD

    Note: The RODs will determine the final status for the HWMUs as well as the site.

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