

**919**

**REMOVAL #4 WORK PLAN  
U.S. DOE FERNALD  
OH6 890 008 976**

**11-30-90**

**USEPA/DOE  
2  
LETTER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8  
230 SOUTH DEARBORN  
CHICAGO, ILLINOIS

919

NOV 30 1990

REPLY TO ATTENTION OF:

5HR-12

FACEDALE AND  
FEDERAL EXPRESS

Mr. Andrew P. Avel  
U.S. Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: Removal #4 Work Plan  
U.S. DOE Fernald  
OH6 890 008 976

Dear Mr. Avel:

On November 5, 1990, the United States Department of Energy (U.S. DOE) submitted a work plan for removal #4 - K-65 silos. In accordance with Section IX.C of the 1990 Consent Agreement, the United States Environmental Protection Agency (U.S. EPA) is approving the work plan with the following modifications:

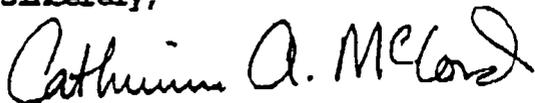
1. Considered the urgency of this removal action, the proposed work plan schedule is shortened for completion of bentonite installation by December 1, 1990.
2. Page 1, Paragraph 1: To be consistent with the Engineering Evaluation/ Cost Analysis (EE/CA) approval and the proposed Clean Air Act Federal Facility Compliance Agreement, the following language is incorporated into the first removal objective: "The objective of this removal action is to reduce radon emissions to a level as low as reasonably achievable and the goal is an ambient radon level of no greater than 0.015 Pci/l above background at the location of the maximally exposed individual at a non-FMPC location".
3. Page 2, Paragraph 2: Radon gas is also a radioactive hazardous substance of concern.
4. Page 8, Table 3-2: Radon-222 gas is added to this table as a contaminant, along with its associated primary hazard, limit, and action level, as it is for the other hazardous substances of concern.
5. Page 10, Paragraph 3: The last line in the work plan has not been completed. It should read: The existing FMPC Standard Operating Procedures for the radon treatment system will be utilized. This document is an attachment to the sampling and analysis work plan.

- 6. Page 12, Paragraph 1: The CCTV will be decontaminated or properly disposed after the installation of the bentonite.
- 7. Page 13, Paragraph 1: The performance of the bentonite slurry in reducing radon emissions will be monitored by the collection and analysis of samples of the tank headspace (above the bentonite) on an ongoing basis until final remedial action is implemented.
- 8. The manways of silos 1 and 2 will not be opened until the radon treatment system lowers the radiation levels on the dome surface at each manway to 75 mrem/hour or lower, in accordance with the K-65 sampling procedures.
- 9. Results from the monitoring of the silo headspace will be used to determine if any modifications are needed to the bentonite, including adjustment of moisture content.

U.S. DOE is to immediately implement the approved work plan in accordance with the schedule contained therein.

Please contact me at (312/FTS) 886-4436 if you have any questions regarding this matter.

Sincerely,



Catherine A. McCord  
On-Scene Coordinator

cc: Richard Shank, OEPA  
Graham Mitchell, OEPA - SWDO  
Leo Duffy, U.S. DOE - HDQ  
Joe LaGrone, U.S. DOE - ORO