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**CONCERNS LACK OF APPROVAL FOR
ALTERNATE EFFLUENT MONITORING**

07/12/91

USEPA/DOE-FMPC

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LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

1897

JUL 12 1991

REPLY TO ATTENTION OF:
(5AT-26)

Behram Schroff
United States Department of Energy
FMPC Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Schroff:

According to the information sent to us regarding your application for alternate effluent monitoring, we must regretfully withhold approval of this form of monitoring at this time. The opinion, as shown in the enclosed recommendations from both the Environmental Standards Branch and Compliance Monitoring Branch, is that the application not be approved at this time.

Please note the comments in the enclosed memo. These deficiencies, we believe, can be readily corrected in minimal time. If this is the case, then we will be able refer this information to our Headquarters to reconsider the application. We hope that the information can be acquired rapidly so that we may continue in the process of consideration for approval by our Headquarters Staff for this application.

If you have further questions or comments concerning this application, please call me at (312) 886-6175 or call Michael Murphy at (312) 353-6686.

Sincerely yours,

James C. Benetti
James C. Benetti, Chief
Radiation Section
Air Toxics and Radiation Branch

Enclosure

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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AIR AND RADIATION

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AIR TOXICS AND RADIATION
BRANCH
U.S. EPA, REGION V

MEMORANDUM

SUBJECT: Review of Alternative Effluent Monitoring of
Radionuclide Point Sources for Feed Materials
Production Center, Fernald, Ohio

FROM: Al Colli, Acting Chief *Al Colli*
Environmental Standards Branch
Criteria and Standards Division (ANR-460)

Mamie Miller, Chief *Mamie R. Miller*
Compliance Monitoring Branch
Stationary Source Compliance Division (EN-341W)

TO: Michael Murphey^s, Health Physicist
Air Toxics and Radiation Branch

We have reviewed the request for approval of alternative effluent monitoring of radionuclide point sources submitted by the Feed Materials Production Center (FMPC), Fernald, Ohio, that Deborah M. Arenberg sent us and have concerns about the completeness of the submission.

Although the title of the application suggests that approval is requested for point sources, our primary concern is associated with approval for non-point sources which have the potential to exceed 1% of the standard. The information provided describing the procedures for monitoring these sources is inadequate. At a minimum, the application should identify the radionuclides being released to the air and provide a complete description of the monitoring and testing procedures. Since environmental monitoring is being used to determine emissions from a non-point source, the provisions of section 61.93 (5) should be followed.

We are particularly concerned about emissions from the silo. Since the radionuclides have not been identified, could the gas seeping through the silo be radon which would be subject to 40 CFR 61, Subpart Q requirements? Clearly, we do not want to approve environmental monitoring procedures in this application that FMPC will construe as meeting the requirements of Subpart Q.

Furthermore, the proposed test procedures should be presented in a detailed step-by-step format. Each test procedure should be clearly explained in a manner similar to Reference Method 5. Also, an example of Quality Assurance procedures as required by Method 114 should be provided.

Finally, specific problems or questions regarding the request have been identified. Is isokenetic sampling being performed for wet stacks? Under Appendix I, pilot tube measurements should be taken at the very least semi-annually as opposed to annually. Also, as proposed for wet exhaust point sources, the use of periodic flow rate measurements as opposed to continuous flow rate measurements are not acceptable.

In summary, we believe the application should not be approved as submitted and that FMPC should be required to provide the additional information described above. If you have any questions please contact Al Colli of ORP at FTS 398-8787 or Suzanne Childress of SSCD at FTS 398-8677. Thank you.