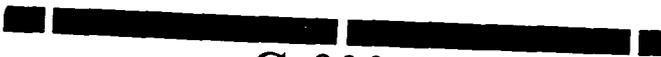


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G-000-103.25

**REQUEST FOR APPROVAL OF ALTERNATIVE
EFFLUENT MONITORING OF RADIONUCLIDE
POINT SOURCES**

09/04/91

USEPA/DOE-FSO

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LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
230 SOUTH DEARBORN STREET
CHICAGO, IL 60604

2156

SEP 04 1991

REPLY TO THE ATTENTION OF:
(5AT-26)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerald W. Westerbeck
Site Manager
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

RE: Request for Approval of
Alternate Effluent
Monitoring of
Radionuclide Point
Sources

Dear Mr. Westerbeck:

Thank you for your submittal of a Request for Approval of Alternate Effluent Monitoring of Radionuclide Point Sources at the Feed Materials Production Center, dated September 19, 1990. The application was submitted pursuant to 40 CFR 61.93 of the National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities, 40 CFR 61, Subpart H.

The United States Environmental Protection Agency (USEPA) has completed its review of the application. USEPA has determined, pursuant to 40 CFR 61.93, that the information contained in the application is insufficient to evaluate the request for approval, and USEPA hereby requests the following additional information.

1. Section I - The document should individually identify which point sources are being requested for exemption and the reason for the exemption. It is difficult to evaluate the effect of the exemption because there are no details of the existing stacks and sample points. The following information is needed:
 - a. details of the existing flow rates,
 - b. variability of existing flow rates,
 - c. sampling locations and how proposed locations deviate from the requirements,
 - d. method of sampling,

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- e. method of flow rate measurements,
- f. the calculated effective dose equivalent, to judge the magnitude of the risk of allowing the exemption

All of this information should be included in one table. It is acknowledged that some of the data is given for some of the points (see other items below). Figure 2 is difficult to read, and Table 1 gives some information on the 10 sources expected to operate in Fiscal Years 1990 and 1991, however, all of the 38 sources referenced need to be specified.

- 2. Section II, page 6 - The document states that FMPC proposes to continue to use a single point continuous sampler for point sources that use a certain type of dust collector built before 1987, as well as dry stacks without control equipment. It is not possible, with the current documentation, to relate this information to the stacks in question. Specifically USEPA needs to know whether this covers all the dry exhaust points or whether there are others that have different sampling methods or are not sampled.
- 3. Section II, page 6 - The document states that for the dry stacks, the requirements are impractical because of safety/accessibility, physical dimensions, and planned replacement of emission control devices. These are valid reasons for exemption, however, sufficient supporting documentation should be provided:
 - a. Section II.1.i - Sufficient documentation should be provided on how it deviates from the standard, where would it have to be relocated to, and what the safety concern is.
 - b. Section II.1.ii - Limitations in the existing stack design is a valid reason for exemption. However, more details should be provided on which stacks come under the criteria. Also, though a certain stack cannot comply due to existing dimensions, reasons should also be given why the sample point could not be improved.
 - c. Section II.1.iii - Replacement of existing control devices is a valid reason for exemption, however, the document refers to replacing "many" of the stacks and that the replacements are currently planned. Additional documentation needs to be submitted listing which stacks and when replacement is planned (i.e., the length of the exemption requested needs to be specified.)
- 4. Section III.1.i - The frequency of the periodic measurements using the maximum velocity needs to be specified. A possible alternative is to measure flow prior to entering the stack or wherever it becomes saturated, if the system design permits.
- 5. Section III.2.b - This paragraph notes that the samples are continuously withdrawn, except for short change-out periods. This is acceptable, except it is in conflict with Table 1, which notes on sample point 8 that only periodic sampling will be taken, and that sample point 10

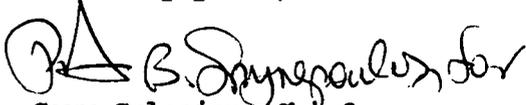
might have no sampling. Again, there needs to be a clear listing of all stacks, the proposed method to be used, and the reasons for exemption.

6. Section IV - This paragraph covers non-point sources and notes that emissions are estimated by engineering calculations. This is acceptable, although it is noted that roof exhausts are not normally considered non-point sources.

Please submit the above information to Gary V. Gulezian, Chief, Air Toxics and Radiation Branch (5AT-26), USEPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604.

If you have any questions in regard to this letter, please contact Michael Murphy, of my staff, at (312)/FTS 353-6686.

Sincerely yours,



Gary Gulezian, Chief
Air Toxics and Radiation Branch (5AT-26)

cc: Al Colli, Chief
Environmental Standards Branch (ANR-460W)
Office of Radiation Programs

Ellen Rattigan
Stationary Source Compliance Division (EN-341W)