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RADON FLUX MEASUREMENT PLAN



Department of Energy
Fernald Environmental Management Project
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DOE-034-92

Mr. James Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V - 5HR-12
230 Dearborn Street
Chicago, Illinois 60604

Mr. James Benetti
United States Environmental Protection Agency
Air and Radiation Branch
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Saric and Mr. Benetti:

RADON FLUX MEASUREMENT PLAN

Reference: Letter, DOE-417-91, G. W. Westerbeck to D. Kee, "Report on Radon Flux Estimates", dated December 17, 1990

Enclosed is a copy of the plan for the Radon Flux Measurement Survey for the waste pit area at the U.S. DOE Fernald Environmental Management Project (FEMP). This document is submitted to U.S. EPA for review and approval, in response to our negotiations concerning the National Emission Standard for Hazardous Air Pollutants (NESHAP), Sub-part Q, Radon Emissions from Department of Energy Facilities (40 CFR 61).

This work plan is an addendum to the approved Remedial Investigation/Feasibility Study Workplan. It meets the commitment made in the response to U.S. EPA comments in the Engineering Evaluation/Cost Analysis for the Waste Pit Responsiveness Summary of August, 1990.

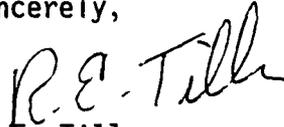
In May 1990, DOE and U.S. EPA began negotiating a compliance agreement for NESHAP, Subpart Q. During these negotiations, DOE committed to submitting a report on radon flux estimates to U.S. EPA. This report (Reference) was submitted in December, 1990 and it was inconclusive on the amount of radon flux emanating from the waste pits. It was jointly agreed that DOE should seek to measure the radon flux from the waste pits.

The enclosed documents are designed to provide the plan and methodology for measuring radon-222 flux from potential sources subject to regulation under Subpart Q. They consist of a sampling and analysis plan, quality assurance plan, and a schedule for completion of the activities. The health and safety plan is in draft and will be submitted under a separate cover by the end of October, 1991.

We are taking this approach based on a telephone conversation on September 26, 1991, between D. Arenberg of your staff and B. Shroff of mine, where it was agreed that U.S. EPA would evaluate our submittal and grant conditional approval for sampling even though the health and safety plan is not yet final. This would permit the sampling activity to be accomplished before the ground freezes (as required by Method 115 in 40 CFR 61).

If your staff has any questions, please ask them to contact Behram Shroff at FTS 774-6003.

Sincerely,



R. E. Tiller
Manager

FO:Shroff

Enclosure: As stated

cc w/o encl.:

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