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**COMMENTS ON K-65 INTERIM STABILIZATION
PROJECT**

10-9-87

**OEPA/DOE
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LETTER**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

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10-4-87
File



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Richard F. Celeste
Governor

Subject:

K-65 interim stabilization
project

October 9, 1987

Mr. James Reafsnyder
U.S. DOE-FMPC
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

The Ohio EPA and our consultant, AWC Nuclear Services, Inc. have reviewed the materials presented concerning the K-65 interim stabilization project and your response to Graham Mitchell's letter dated September 21 and reached the following conclusions.

The optimal remediation to take on the K-65 silos is removal of the waste for disposal offsite. However, due to logistical concerns which prevent the immediate removal of this material, the proposed interim stabilization project should proceed. This decision is mainly due to the poor structural condition of the silos and concern that a dome failure could occur before the wastes are removed. Catastrophic failure of a dome could result in a cloud of radon gas and daughters being released to the surrounding area. Such a release could impact both FMPC employees and local residents.

My staff has determined that a permit to install is not appropriate for this project because it does not represent a new air source or an increase in existing sources. We also agree that it is important to collect a gas sample from the K-65 silos to determine actual concentrations prior to beginning the project and agree with your proposed method to collect a sample.

The following conditions and recommendations about this project have been made by Ohio EPA staff and our consultant:

1. Ohio EPA recognizes this project as an interim remedial action only and will not in the future consider this action as final remediation.
2. Ohio EPA requests that DOE "fast track" the record of decision for the final remediation of the K-65 silos.

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Mr. James Reafsnyder
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3. Our consultant (AWC) recommended that HEPA filters may be needed in the radon treatment system to remove particulate radon daughters. Your October 6, 1987 response to Graham Mitchell's letter proposes installing a prefilter to remove radon daughters. This should be sufficient to remove radon daughters during the operation of the closed loop system.
4. Ohio EPA expects to review the results of the radon diffusion tests currently being conducted prior to DOE beginning the foaming project. These results are expected October 12, 1987. Please contact Graham Mitchell when these data are available.

Please keep us informed regarding the status of this project. If you have any questions please contact Graham Mitchell at (513)-449-6357.

Sincerely,



Richard L. Shank, Ph.D.
Director

GEM/dp

cc: Jack Van Kley, OAG
Bill Franz, USEPA, Region V
Larry Jensen, USEPA, Region V