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**INFORMATION REQUESTED DURING MAY 27-29
USEPA INSPECTION**

08/07/92

**DOE-2306-92
DOE-FN/USEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
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AUG 07 1992

DOE-2306-92

Mr. Philip E. Gehring
U. S. EPA - Region V
25089 Center Ridge Road
Westlake, Ohio 44145

Dear Mr. Gehring:

INFORMATION REQUESTED DURING MAY 27-29 USEPA INSPECTION

Reference: DOE-1876-92, R. E. Tiller to P. Gehring, "Multi-Media Inspection - Asbestos," dated June 11, 1992

During the inspection of the Fernald Environmental Management Project (FEMP) conducted May 27 through 29, 1992, FEMP personnel agreed to provide several documents and items of additional information to assist in your review of our activities. This letter provides the requested information.

FEMP Asbestos Activities

The referenced letter provided a summary of the sitewide asbestos survey as well as a response to your concern regarding potential asbestos emissions from Plant 2/3. As stated in the reference, Plant 2/3 has been designated as an asbestos area requiring use of a respirator due to potential emissions that would result from deteriorated transite falling to the ground. Samples taken in the interior of the building show no elevated ambient asbestos levels.

Operation of the West Eimco Filter

After review of emission data from various sources, you expressed concern regarding emissions from the West Eimco Filter. Although no emissions were reported in the Annual National Emission Standards for Hazardous Air Pollutants (NESHAP) Report for 1990 or 1991, nor in Quarterly Reports of Airborne Uranium Emissions for late 1991, Plant 8 inspection logs for several months during 1992 indicate that the West Eimco Filter was operated.

Examination of operations records indicates that the reported emissions are valid. The West Eimco Filter was not, in fact, operated during 1990 or 1991. Due to damage to the Oliver Filter during early 1992, however, it became necessary to operate the West Eimco Filter to provide the necessary filter capacity. Emissions resulting from operation of the West Eimco Filter during 1992 are being tabulated on a monthly basis and will be included in the 1992 Annual NESHAP Report.

AUG 10 1992

Inspection of Methanol Storage Tank

It was reported during your inspection that the Methanol Storage Tank at the Bionitrification Facility was scheduled to be inspected, as required by the Ohio EPA Permit to Operate (PTO), during June; you requested a copy of the report documenting the completed inspection. The tank was inspected June 3, 1992; a copy of the inspection report is enclosed.

Herbicide Application Contract

You requested a copy of the contract for Herbicide application. A copy of the purchase order issued to Mr. Green Lawn Care on June 22, 1992, as well as the Material Safety Data Sheet (MSDS) for the herbicide is enclosed.

Floor in Building 81

You requested a summary of the method of repair and schedule of events for necessary repairs to the expansion joints in the floor of Building 81. A requisition has been repaired and advertised to potential contractors. A plan outlining the specific repairs and schedule for repair will be forwarded to you as soon as it becomes available.

Active Flyash Pile

You expressed interest in measures to be employed to control fugitive emissions and runoff from the Active Flyash Pile. Enclosed is a report and three photographs documenting wind erosion and runoff control measures implemented through the Active Flyash Pile Removal Action.

Restrictions on Access to the Active and Inactive Flyash Piles

During your tour of the Active Flyash Pile, FEMP personnel indicated that they had been instructed not to walk on the pile. You questioned why there were no barriers or warning signs in place if access was restricted. Upon further evaluation it is apparent that the information relayed to you concerning access to the pile was incorrect. There are no specific restrictions regarding access to the pile; no barriers or warning signs are required. The instructions not to walk on the pile were intended to apply to the radiological contamination areas which you observed on the inactive flyash pile. These areas on the inactive flyash pile have recently been discovered to contain material with contamination levels in excess of FEMP guidelines for uncontrolled areas. They are roped off and marked to restrict access.

As I have indicated previously, I would appreciate receiving copies of the reports generated as a result of your inspection of the FEMP. Receipt of these reports will assist FEMP personnel in assuring that all of the concerns identified by your inspection are promptly and adequately addressed.

If you or your staff have any questions regarding the enclosed information, or desire additional information to aid your evaluation, please contact Wally Quaider of my staff at FTS/Commercial (513) 738-6160.

Sincerely,



W. D. Adams
Acting Manager

FN: Quaider

Enclosures: As Stated

cc w/enc.:

K. A. Hayes, EM-424, TREV II
J. Saric, U.S. EPA
P. Harris, OEPA-Dayton
L. S. Farmer, WEMCO
J. P. Hopper, WEMCO
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