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**REQUEST FOR APPROVAL TO USE  
ENVIRONMENTAL MEASUREMENTS TO  
DEMONSTRATE COMPLIANCE WITH 40 CFR 61,  
SUBPART H**

**08/19/92**

**USEPA/DOE-FN**

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**LETTER**



AGENCY

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REPLY TO THE ATTENTION OF:

(R-19J)

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

William D. Adams, Acting Manager  
Fernald Field Office  
United States Department of Energy  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

Re: Request for Approval to Use  
Environmental Measurements to  
Demonstrate Compliance with  
40 CFR 61, Subpart H

Dear Mr. Adams:

On January 28, 1992, the United States Department of Energy (USDOE) submitted to the United States Environmental Protection Agency (USEPA) a request for approval to demonstrate compliance with the requirements of the National Emission Standards for Radon Emissions from Department of Energy Facilities, 40 CFR 61, Subpart H, through the use of environmental measurements of radionuclide air concentrations at the Fernald Environmental Management Project (FEMP) in Fernald, Ohio. The purpose of this letter is to notify USDOE that after due consideration of the information submitted, the USEPA denies this request.

This denial is partially based on the requirements of the regulation at 40 CFR 61.93(b)(5). The regulation allows the use of environmental measurements only if the six criteria in this section are met and only as an alternative to air dispersion calculations. This request does not meet the requirements, because it is seeking approval to substitute environmental measurements for emission measurements or estimates, as well as air dispersion calculations.

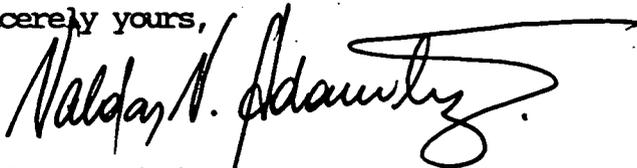
Also, at this time USEPA is not convinced that the critical receptor locations proposed by USDOE are adequate. Therefore, we recommend, for the time being, that USDOE estimate the diffuse and fugitive emissions as they have done in past annual reports, and use these estimates to calculate the effective dose equivalent with an approved model (i.e. CAP-88).

USEPA is developing recommended methods for assessing fugitive and diffuse emissions. The location of critical receptors for these types of emissions are expected to be addressed in these methods. Consequently, it is not

desirable for USEPA to allow USDOE to use the proposed alternative before appropriate methods are developed.

If you have any questions concerning this action, please contact Michael Murphy, of my staff, at (312) 353-6686.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Valdas V. Adamkus". The signature is written in a cursive style with a large, sweeping flourish at the end.

Valdas V. Adamkus  
Regional Administrator