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**NOTICE OF RECEIPT OF RADIONUCLIDE
NESHAPS ANNUAL REPORT AND REQUEST FOR
ADDITIONAL INFORMATION**

09/11/92

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LETTER



UNITED STATES ENVIRONMENTAL
REGION 5
AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:
(AT-18J)

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: Notice of Receipt of
Radionuclide NESHAPs Annual
Report and Request for
Additional Information

Dear Mr. Adams:

This letter is to notify you of our receipt of the annual report on Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities for the Fernald Environmental Management Project (FEMP) in Fernald, Ohio. We appreciate that the report was submitted in a timely manner. We also, appreciate that you submitted a copy of the computer run on computer disk. This was helpful in evaluating whether the emissions reported were consistent with the requirements of the rule.

However we do have some remaining concerns which are enclosed. Please reply to these comments in a timely fashion so that we may assure that you are in compliance with all requirements.

If you have any questions regarding our review, please feel free to contact me or Michael Murphy of my staff at (312) 353-6686.

Sincerely yours,

David Kee, Director
Air and Radiation Division

Enclosure

**SUBPART H ANNUAL REPORT
COMMENTS FOR FEMP**

- 1) An equation is referenced in estimating fugitive emissions that was originally developed for coal storage piles. Please provide a copy of the equation or a more specific citation for this equation.
- 2) The meaning of "significant" is unclear in the context of reporting accidents and non-routine events at FEMP during CY-1992. Please provide clarification as to the criteria used to determine a significant release.
- 3) Regarding the November 27, 1991, broken probe alarm, we appreciate the diligence of the FEMP personnel in attempting to provide an accurate estimate of possible emissions during the time the probe was off line. We are concerned that the appropriate documentation of the times of this problem are narrowed to assure minimal discrepancies in the actual versus estimated time off line.
- 4) While continuous monitoring is not required for stacks that are estimated to have emissions below 1 percent of the standard or 0.1 mrem, it is required that there be periodic confirmatory measurements to verify the low emissions. The manner of the sampling as well as the estimates and sampling schedule(s) need to be provided.
- 5) A recalculation of the emission factor should be periodically considered, as the conditions have changed for Plant 8. This will assure that the system is operating both consistently with the originally calculated emission factor as well as with the new conditions to be found at the site.
- 6) In calculating the fugitive dust emissions from the Waste Pits, take into consideration that the radon testing procedures may have caused additional fugitive dust emissions. Also, the dewatered state of Waste Pit 5 needs to be specifically addressed to assure that no additional fugitive emissions were released.
- 7) FEMP used their own meteorological data with a 93.9 percent recovery rate.
- 8) New fencing that is installed has a potential to cause additional fugitive emissions due to soil disturbance. Please provide additional information or justification as to the reasoning for not reporting this activity under 40 CFR 61.96.
- 9) Clarify whether Table 1A takes into account the dewatered state of Waste Pit 5 in the emission listing.
- 10) Table 2A is unclear. It would appear that the amounts in the

tables should either be doubled or given as a total.
Additional explanation would be helpful.

- 11) While applications to construct or modify are only required if the emissions are modeled to be 1 percent or more of the standard, 0.01 mrem or greater, in the annual report all possible emissions from activities not specifically noted elsewhere need to be provided.