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CONSOLIDATION OF DISCHARGE REPORTS

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LETTER**



Department of Energy

Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

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FEB 28 1992
DOE-987-92

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Saric:

CONSOLIDATION OF DISCHARGE REPORTS

The purpose of this letter is to request certain changes in reporting requirements specified in the 1986 Federal Facility Compliance Agreement (FFCA). At present, the Department of Energy (DOE), Fernald Environmental Management Project (FEMP), submits quarterly reports on air emissions and water discharges to the United States Environmental Protection Agency (U.S. EPA) in compliance with the FFCA.

Since production activities at the FEMP ceased in July 1989, routine air emissions are reported for only three point sources: Eimco Filter 1, Oliver Filter, and Decontamination and Decommissioning Facility. Particulate uranium emissions from these sources for calendar year 1991 amounted to only 0.047 kilograms of uranium. Therefore, we feel that continuation of the quarterly air emissions report is no longer justified.

Monthly records of particulate uranium emissions will be maintained at the FEMP, and uranium emissions information will continue to be reported in the National Emissions Standards for Hazardous Air Pollutants (NESHAP) annual report as required in 40 CFR 61.94(b). Hence U.S. EPA will be continually apprised of air emissions at the FEMP.

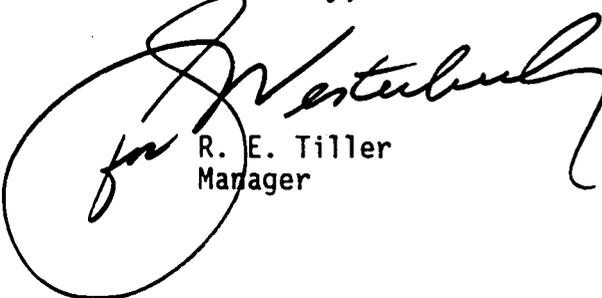
Data on water discharge is provided to the U.S. EPA in the Monthly Consolidated Consent Agreement Report. We feel it adequately characterizes liquid discharges now reported quarterly under the FFCA. This includes the total quantity of uranium discharged from the FEMP to the Great Miami River via Manhole 175, the average uranium concentration for the previous 12 months, and the percent of the Derived Concentration Guide (DOE Order 5400.5) for water discharged offsite. Similar data are reported for overflow to Paddy's Run from the Stormwater Retention Basin. The total quantity of uranium discharged to Paddy's Run from uncontrolled areas is estimated on the basis of monthly rainfall.

Results for the majority of radionuclides being analyzed at Manhole 175 have historically been less than the detection limit. With the cessation of production activities, it is unlikely that there will be any escalation of the concentrations observed in the past.

For the reasons stated above, submittal of a quarterly report on air emissions and liquid discharges under the 1986 FFCA is no longer justified and we request that it be discontinued. Pending U.S. EPA approval of this request, U.S. DOE will continue to submit the quarterly reports.

If you have any questions, please contact Behram Shroff at (513) 738-6003.

Sincerely,



R. E. Tiller
Manager

FO: Shroff

cc:

L. Griffin, EH-221, FORS
S. Fauver, EM-424, TREV II
E. D. Savage, WEMCO
C. J. Brown, WEMCO