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U-006-305 .56

RE: SILO SAMPLING PLAN U. S. DOE - FERNALD

04/20/89

USEPA DOE-FN
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COMMENTS

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-12

APR 20 1989

Mr. James A. Reafsnyder
U.S. Department of Energy
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Re: Silo Sampling Plan
U.S. DOE - Fernald
OH6 890 008 976

Dear Mr. Reafsnyder:

On September 9, 1989, the United States Department of Energy (U.S. DOE) submitted a sampling plan for four waste silos (above-ground tanks) at the Feed Materials Production Center in Fernald, Ohio. The United States Environmental Protection Agency (U.S. EPA) provided comments on this proposal in an October 14, 1988, letter. U.S. DOE submitted a revised sampling plan and an implementation plan on January 3, 1989. Due to the employee strike and the winter season, the sampling effort was delayed until recently.

U.S. EPA has reviewed the revised sampling plan and has determined that all comments have been adequately addressed and U.S. EPA approves the plan.

In an April 19, 1989, telephone conversation with Margaret Wilson, U.S. EPA was informed that the crane to be used for sampling is onsite and that U.S. DOE and Westinghouse is prepared to start sampling the silos. Also, that the facility failed to submit a renewal application for the air Permit To Operate (PTO) for silos #1 and #2 (silos containing K-65 residues) prior to the expiration of the existing permits and that the sampling of these silos may be delayed until the PTOs are renewed.

U.S. EPA is very concerned about the additional delays that may occur in the K-65 silo sampling effort by the failure to have submitted timely permit renewal applications and urge that U.S. DOE and Westinghouse do everything possible to proceed with this important sampling activity. It is not clear

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why the sampling effort can not proceed prior to issuance of the new PTOs for silos #1 and #2, if approval for sampling is granted by the Ohio Environmental Protection Agency and the Southwest Ohio Air Pollution Control Agency.

Please contact me at (312 or FTS) 886-4436, if there are any questions regarding this matter.

Sincerely,



Catherine A. McCord
Remedial Project Manager

cc: Maury Walsh, OEPA - CO
Graham Mitchell, OEPA - SWDO
Grover Smithwick, USDOE - ORO
Kitty Taimi, USDOE - HDQ
Bruce Boswell, Westinghouse

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