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G-000-104 .123

**FEED MATERIALS PRODUCTION CENTER (FMPC), APPLICATION TO
MODIFY PURSUANT TO 40 C.F.R. PART 61**

02/24/89

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

FEB 24 1989

REPLY TO THE ATTENTION OF:

Mr. James A. Reafsnyder
 Site Manager
 Feed Materials Production Center
 United States Department of
 Energy
 P.O. Box 398705
 Cincinnati, Ohio 45239-8705

Re: Feed Materials Production Center
 (FMPC), Application to Modify
 Pursuant to 40 C.F.R. Part 61

Dear Mr. Reafsnyder:

In accordance with the provisions of 40 C.F.R. Part 61, we have reviewed information submitted on December 19, 1988, to the United States Environmental Protection Agency (U.S. EPA), to determine whether the Scrap Pickling Facility, #6-053, will comply with the radionuclide emission standards promulgated in 40 C.F.R. Part 61, Subpart H.

In the letter that accompanied the submittal, you stated that the application was for a determination by the Administrator under 40 C.F.R. §61.06 of whether the equipment to be installed constitutes modification of the source, as defined in 40 C.F.R. §61.15. You requested that if U.S. EPA determined this installation to be a modification, that the submittal should be considered as an application to modify under the requirements of 40 C.F.R. §61.07.

In our letter to you dated January 23, 1989, U.S. EPA stated that the submitted data indicated that the installation of the Scrap Pickling Facility would result in an increase in the rate of radionuclide emissions to the atmosphere. The installation therefore constitutes modification, as defined at 40 C.F.R. §61.15.

U.S. EPA has now completed a review of the information with the intent to approve or deny approval of modification pursuant to 40 C.F.R. §61.07.

In reviewing the submitted material, U.S. EPA uncovered the same types of errors and deficiencies that were present in the 14 applications for approval of modification which were received by our office on August 10, 1988. The errors and deficiencies are summarized below with references made to our letter to you dated December 23, 1988, which details the errors and deficiencies present in the 14 applications to modify.

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1. **Calculation Methods and Assumptions.** The proration for dose estimation is made using 1986 annual emissions data. This data was shown to be based upon incorrect assumptions and calculation methods and was so stated to you in my letter of April 1, 1988. It is inappropriate to use faulty data for the proration. Also, the proration method as given fails to give the factors used to isotopically convert between activity and mass and between activity and dose. These deficiencies are also discussed in our December 23, 1988, letter to you.

2. **Application Format.** As stated in the December 23, 1988, letter, the FMPC-UF₆ to UF₄ Process No. 2 Facility Application is to serve as a model for all 40 C.F.R. §61.07 applications. The draft Federal Facilities Compliance Agreement states that U.S. DOE shall submit all applications for approval of construction or modification pursuant to 40 C.F.R. §61.07 in the format of the UF₆ to UF₄ Process No. 2 Facility Application, provided that a list of specified information is included. This specified information is listed in the draft Federal Facilities Compliance Agreement and in the December 23, 1988 letter. Based upon this criteria, the submittal is deficient in:

- a. not identifying the specific radionuclides released;
- b. not using AIRDOS-EPA/RADRISK for the dose estimation;
- c. not estimating the dose to the most exposed person under routine operations; and
- d. not giving a description of and dose estimates for a potential accident.

In summary, U.S. EPA finds the application submitted on December 19, 1988, to be deficient in key information. Therefore, we are denying approval of this installation at this time. Until approval of this installation is given, you are advised not to operate it as this action may constitute a violation of the Clean Air Act.

If you have any questions pertaining to the comments made in this letter, please contact Linda Hamsing at (312) 886-6814.

Sincerely yours,



David Kee, Director
Air and Radiation Division (5AC-26)

cc: Al Colli
Office of Radiation Programs

Weldon Dillow
United States Department of Energy
Oak Ridge Operations

Patricia P. Walling, Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency

Charles E. Schumann, Director
Southwestern Ohio Air Pollution Control Agency