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R-020-207.28

**CONDITIONAL APPROVAL - TRASH COMPACTOR PROCEDURE FOR RA  
#9**

07/23/96

OEPA            DOE-FN  
2  
COMMENTS



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
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J-02569  
JUL 23 9 35 AM '96

George V. Voinovich  
Governor

July 23, 1996

RE: DOE FEMP  
MSL 531-0297  
HAMILTON COUNTY  
CONDITIONAL APPROVAL - TRASH  
COMPACTOR PROCEDURE FOR RA# 9

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's June 27, 1996 submittal, "Inclusion of Trash Compactor Procedure in Removal Action Number 9." The condition for approval of the document is successful resolution and incorporation of the following Ohio Department of Health comments:

Commenting Organization: Ohio EPA                      Commentor: ODH  
Section #: 7.7 Pg #: 6 of 40 Line #:                      Code: C  
Original Comment #:

Comment: What is the rationale for requiring the employee to finish their shift prior to submitting the urine sample? The reviewer presumes that the employees are monitored on roughly a semiannual basis for uranium body burden. With this assumption in mind, it is possible for the individual to have taken up a quantity of uranium during the ensuing period. If the uptake was going on for a long period the chronic uptake could be confused for an acute episode.

Furthermore, the use of urine bioassay is not the method of choice for determining exposure to insoluble forms of uranium.<sup>1</sup> Is the solubility of the compounds known in advance of the testing or should a more appropriate form of testing be considered?

<sup>1</sup> U.S. Atomic Energy Commission Regulatory Guide 8.11 Applications of Bioassay for Uranium, June 1974.

Response:  
Action:

Commenting Organization: Ohio EPA                      Commentor: ODH  
Section #: 8.5.5 (A) Pg #: 12 of 40 Line #:                      Code: C  
Original Comment #:

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Mr. Reising  
 July 23, 1996  
 Page 2

Comment: Once the item is discarded "through the reject door" is it in the same environment as the sorters? If so are the sorters wearing respiratory protection? What protective clothing are the sorters required to wear?

Response:

Action:

Commenting Organization: Ohio EPA                      Commentor: ODH  
 Section #: 8.5.5 (G) Pg #: 12 of 40 Line #:              Code: C  
 Original Comment #:

Comment: Placement of this subpart as the final item in this sections seems contrary to 10CFR835.101(c). This section states, "The content of each RPP shall be commensurate with the nature of the activities performed and shall include formal plans and measures for applying the as low as reasonably achievable (ALARA) process to occupational exposure."

By discarding the item into the environment frequented by the staff and then requiring those staff personnel to fill out an operations log, notify their supervisor so the supervisor can make several determinations as to which forms need to be filled out and finally contacting radiological control personnel is not in keeping with the ALARA philosophy.

What responsibility will "Radiological Control" assume upon notification?

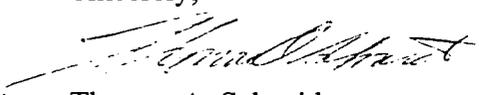
What training for radiation detection and what instrumentation is available for the operators and sorters at the location of the compactor?

Response:

Action:

If you have any questions, please contact me at (513) 285-6466.

Sincerely,

  
 Thomas A. Schneider  
 Fernald Project Manager  
 Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
 Terry Hagen, FERMCO  
 Ruth Vandergrift, ODH  
 Sharon McLellan, PRC  
 Manager, TPSS/DERR,CO

Dave Ward, GeoTrans