



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FERNALD

LOG M-01455

JUL 15 10 25 AM '99

FILE:
REPLY TO THE ATTENTION OF
LIBRARY: _____

JUL 16 1999

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

2391

RE: Integrated Site Environmental Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Integrated Site Environmental Report (ISER). The document provides the results of site's environmental monitoring program for calendar year 1998 as required by the Integrated Environmental Monitoring Plan, revision 1 (IEMP).

U.S. EPA finds the document technically adequate and hereby approves the ISER. However, some minor inconsistencies exist which need revision. U.S. EPA has enclosed its comments.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

TECHNICAL REVIEW COMMENTS ON
"1998 INTEGRATED SITE ENVIRONMENTAL REPORT"
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

2391

Commenting Organization: U.S. EPA Commentor: Saric
Table #: 2-4 Page #: 40 Line #: Not Applicable (NA)
Original Specific Comment #: 1

Comment: The entry for flood plain and wetland review requirements notes that delineation was performed in 1992 and approved in 1993 and that updates are performed "approximately every five years." However, the table does not note an update in 1998 or a previous year. If an update is planned for 1999, perhaps after completion of the wetland mitigation construction in the northeast corner of the facility, the update should be noted in the table. If no update is planned, the "every five years" text should be revised in future annual reports to reflect the actual situation.

Commenting Organization: U.S. EPA Commentor: Saric
Figure #: 3-1 Page #: 45 Line #: NA
Original Specific Comment #: 2

Comment: Figure 3-1 shows the entire South Field Module as a "future module area," but Figure 3-2 on Page 47 shows this area as a "current module area," and the text on Page 46 discusses data for the area. Figure 3-1 should be made consistent with the text and other figures in future annual reports.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 5.4.2 Page #: 100 Line #: NA
Original Specific Comment #: 3

Comment: The text states that during the fourth quarter of 1998, there were 24 "exceedances of the DOE Order 5400.5 100 pCi/L radon limit" at the K-65 silos exclusion fenceline. This number differs from the 20 exceedances listed in Table 3-7 of the integrated environmental monitoring status (IEMS) report for the fourth quarter of 1998. This inconsistency should be resolved.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 6.1 Page #: 107 Line #: NA
Original Specific Comment #: 4

Comment: The text states that the maximum effective dose at the fenceline from 1998 air emissions occurred at location AMC-9C and was estimated at 0.26 millirem (mrem) per year. This information differs from data presented in Table 3-4 of the IEMS report the fourth quarter of 1998, which indicates a maximum effective dose of 0.25 mrem per year at location AMS. This inconsistency should be resolved.