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5-106.3

INTEGRATED ENVIRONMENTAL MONITORING PLAN

09/26/96

UDEPA
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COMMENTS

DOE-FN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

SEP 26 1996

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

SRF-5J

RE: Integrated
Environmental
Monitoring Plan

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 Environmental Monitoring Plan (IEMP).

The purpose of this plan is to provide a site-wide strategy to address environmental monitoring in all media including groundwater, surface water, air, sediment, and biota. This document was required pursuant to the Operable Unit (OU) 5 Remedial Design Work Plan.

U.S. EPA has significant concerns with the IEMP. There are no specific criteria for evaluating data to assess whether there is an exceedance of Final Remediation Levels (FRL), nor does the IEMP include procedures for confirming an exceedance, assessing the magnitude of a release, or triggering remedial actions for any environmental medium. The IEMP does not address monitoring during major remedial efforts, such as those for OU 1 or OU 3. The time frame for deliverables is inadequate, since it does not allow for adequate review and comment by U.S. EPA. Finally, there are concerns regarding using a "short list" of FRL analytical parameters, particularly during periods in which major remedial activities are underway.

Therefore, U.S. EPA disapproves the IEMP pending incorporation of adequate responses to the attached comments. U.S. DOE must submit a revised work plan and responses to comments within thirty (30) days receipt of this letter. Given the extensive nature of the comments, U.S. EPA recommends a meeting to resolve these issues and clarify the requirements of the IEMP.

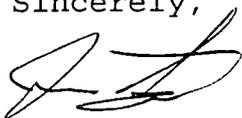
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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



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

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jack Baublitz, U.S. DOE-HDQ
John Bradburne, FERMCO
Charles Little, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

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Commenting Organization: U.S. EPA
Section #: 1.2 Page #: 1-2
Original Specific Comment #: 2

Commentor: Saric
Line #: General

Comment: The conceptual model discussed in this section is not appropriate for the activities planned under the IEMP. The primary objective of the IEMP should be the same as that of the remedial investigation and risk assessment for Operable Unit (OU) 5 -that is, to obtain the necessary data and then to use those data to synthesize all the risks from the fixed sources (those now existing, such as the K-65 silos) and the dynamic sources (the perturbations created by the various remedial and other activities) into an estimate of the total risk to the most exposed individual (MEI). As presented, the IEMP is incomplete. There is no assurance (verification) that all sources, especially changing sources, are monitored adequately. The integration mechanism is inadequate in light of the complex problem at hand. While specific details of the monitoring for each remedial action are outside the scope of the IEMP, this plan should include guidelines for developing such information during the various remedial actions so the results can be incorporated into the overall evaluation. The monitoring must include provisions for both planned operations and reasonably expected unplanned events, such as a 100-year rain storm (with ensuing runoff) and a major spill (with ensuing air emissions). Unplanned releases should be planned for.

Commenting Organization: U.S. EPA
Section #: 1.2 Page #: 1-3
Original Specific Comment #: 3

Commentor: Saric
Line #: 31

Comment: The text proposes to ignore "project-specific emission-control monitoring" for point and area air emission sources. However, those data obtained through such monitoring are essential to support an integrated evaluation of the risk posed by the various on-going actions at FEMP. Emissions from individually acceptable multiple sources may sum to create an unacceptable risk. The text should be revised to discuss the interface between the project-specific air monitoring and evaluation and the overall air monitoring and evaluation which is the subject of the IEMP.

Commenting Organization: U.S. EPA
Section #: 2.2 Page #: 2-7
Original Specific Comment #: 4

Commentor: Saric
Line #: 34 to 40

Comment: The description of waste and soil excavation provided as the last bullet item should be revised to include soils beneath demolished structures in OU3 and OU4 (see Table 2-1).

Quality Standard for particulate matter, which is identical to the Ohio standard, as a "regulatory driver . . . found to have air monitoring implications but only of a project-specific emissions-control nature." The IEMP must provide further justification for this apparently inconsistent categorization of state and federal ambient air quality standards.

Commenting Organization: U.S. EPA
 Section #: 6.2.2
 Original Specific Comment #: 39

Commentor: Saric
 Line #: 30 to 32

Page #: 6-6

Comment: The text states that "there are no additional regulatory-based requirements activated by FEMP's CERCLA applicable and relevant or appropriate regulations (ARAR) or to be considered (TBC) regulations that are not already accommodated within the scope of the IEMP's predecessor environmental monitoring plan (EMP) air monitoring plan". The text implies that the regulatory requirements identified in Section 6.2.2 are a complete list of such requirements. However, a review of the Record of Decision (ROD) for OU5 identified numerous air-related regulatory requirements that are not addressed in Section 6.2.2. Examples of regulatory requirements that are not addressed include, but are not limited to, Ohio Administrative Code (OAC) 3745-57-91 through 93 and 40 Code of Federal Regulations (CFR) 264.601 through 603 (treatment, storage, and disposal of hazardous waste in miscellaneous units); 40 CFR 264 subpart AA (air emission standards for process vents); and OAC 3745-17-07 (control of visible particulate emissions for fugitive dust). Section 6.2.2 of the IEMP should be revised to provide a more complete discussion of regulatory requirements.

Commenting Organization: U.S. EPA
 Section #: 6.4.2.1
 Original Specific Comment #: 40

Commentor: Saric
 Line #: Table 6-1

Page #: 6-12

Comment: This table lists air monitoring locations AMS-8, AMS-9A, AMS-15, and AMS-17, while the accompanying Figure 6-2 appears to show these locations as AMS-8A, AMS-9B, AMS-16, and AMS-17A. Table 6-3 and its accompanying Figure 6-3 have similar discrepancies in the identification of air monitoring locations around Building 65 and elsewhere. The IEMP should be revised so that tables and figures are internally consistent.

Commenting Organization: U.S. EPA
 Section #: 6.4.2.1
 Original Specific Comment #: 41

Commentor: Saric
 Line #: 5 to 14

Page #: 6-13

Comment: This section states that filters from high-volume air monitors will be changed biweekly and that data collected from these monitors will be used to confirm compliance with ambient air quality standards for particulate matter (PM).

reporting requirement is not included in Figure 6-5 under either the current reporting or the IEMP integrated reporting strategy. This discrepancy should be corrected.

Commenting Organization: U.S. EPA
 Section #: 7.2.1
 Original Specific Comment #: 46

Page #: 7-3
 Commentor: Saric
 Line #: NA

Comment: The text states that a correlation between concentrations of uranium in soil and produce have not been documented in previous co-located soil and produce sampling and analysis. The text should indicate specifically why a correlation could not be made. Current research indicates that uranium is taken up by plants from the soil and therefore, a correlation between the concentration of uranium in soil and plants would be expected (W.E. Kennedy, Jr., D. L. Strenge, 1993. *Residual Radioactive Contamination From Decommissioning. Technical Basis for Translating Contamination Levels to Annual Total Effective Dose Equivalent. Final Report. Volume I*). The paragraph should also provide a discussion of previous analytical data derived from the analysis of co-located soil and produce samples to support discontinuing co-located soil and produce sampling.

Commenting Organization: U.S. EPA
 Section #: 8.3.1
 Original Specific Comment #: 47

Page #: 8-5 to 8-6
 Commentor: Saric
 Line #: General

Comment: This section identifies "regulatory drivers" that will be phased into the IEMP reporting strategy. However, several regulatory drivers for the IEMP air monitoring program that were identified in Section 6.2.2 are omitted. Section 8.3.1 should be revised to include a complete list of regulatory drivers, as discussed in preceding sections of the IEMP.

Commenting Organization: U.S. EPA
 Section #: D.2.1.1
 Original Specific Comment #: 48

Page #: D-5
 Commentor: Saric
 Line #: 7

Comment: As noted in this section, the IEMP does not include the air emissions monitoring that will be conducted for individual projects. However, the fence line monitoring and other non-project monitoring conducted under the IEMP must be adequate to confirm that the remedial activities do not produce unacceptable exposures. Continuation of the existing air monitoring networks (as detailed above) is unlikely to meet this need.

development will occur or how model and parameter selection will be documented. Because those issues are fundamental to successful implementation of the IEMP air monitoring program, they should be subject to regulatory agency review and documentation must be included as part of the IEMP.