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COMMENTS: AIR MONITORING PLAN OSDF

09/30/96

OEPA
6
COMMENTS

DOE-FN



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

September 30, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS: AIR MONITORING
PLAN OSDF

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

Dear Mr. Reising:

This letter provides as an attachment Ohio EPA's comments on the Air Monitoring Plan for the On-Site Disposal Facility received on August 28, 1996. A meeting was held on September 18, 1996, with Mike Hickey and Mike Strimbau of Flour Daniel-Fernald, to discuss and clarify the major items in these comments.

If you have any questions, please contact Bill Lohner or me.

Sincerely,


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

- cc: Jim Saric, U.S. EPA
- Terry Hagen, FERMCO
- Ruth Vandergrift, ODH
- Mike Proffitt, DD&GW
- Sharon McLellan, PRC
Manager, TPSS/DERR,CO
- Dave Ward, GeoTrans

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(Warner Cr)
partial
action response
to doe-1282-96 (9999)

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to the proposed OSDF. Please edit the figures to clearly identify the monitoring locations with respect to the OSDF.

Response:
Action:

(6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.1.3 Pg #: General Line #: n/a Code: C

Original Comment #:

Comment: Due to the close proximity of the OSDF to the FEMP fenceline, additional TLD locations should be included in the plan to clearly demonstrate that the predicted levels of direct radiation from the OSDF are measured. According to Figure 4-2, there are only 2 TLD locations along the fenceline adjacent to the OSDF. Additional TLD locations should be added incrementally along the fenceline to measure potential exposures to the public. The spacing of the TLDs should be centrally located (i.e.) the closest point to the east fenceline for each cell of the OSDF. These additional TLD locations should give the public confidence that additional exposures from the OSDF are minimal.

Response:
Action:

(7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.2.2 Pg #: 4-10,11 Line #: n/a Code: C

Original Comment #:

Comment: There is only one continuous (1 hour measurement interval) radon monitoring location near the OSDF (AMS-2). Again, due to the close proximity of the OSDF to the FEMP fenceline, additional continuous radon monitors should be placed at AMS-8A and AMS-9B. (Power is already available at these locations.) The integrating radon monitors, which are collected semi-annually, will not allow for sufficient time to take corrective action when/if elevated radon concentrations are detected.

The wastes which will be placed in the OSDF are not expected to have significant quantities of radium. A demonstration that radon emissions will be insignificant based on the quantities of radium bearing materials being placed in the OSDF may be an acceptable approach to only use IEMP radon monitoring locations.

Response:
Action:

(8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 4.2.3 Pg #: 4-14 Line #: 13-17 Code: C

Original Comment #:

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Comment: The frequency and analytical regimen for the air monitoring stations adjacent to the OSDF are not adequate for OSDF activities. Due to the close proximity of the OSDF to the FEMP fenceline, 40CFR61, Subpart H requirements, and the questionable air concentration predictions, OEPA with USEPA concurrence recommends that isotopic analysis be performed quarterly, rather than annually as stated in the OSDF. Analysis for the isotopes of thorium, uranium, and radium should be considered as a minimum analytical suite. The environmental measurements should be compared to the concentrations listed in Table 2, Appendix E of 40CFR61. (See 40CFR61, Subpart H 61.93(b)(5).) This allows for adequate protection of the public, and will allow for corrective actions to be implemented if necessary.

Response:

Action:

(9) **Commenting Organization:** Ohio EPA **Commentor:** OFFO
Section #: 5.3.2 **Pg #:** 5-2 **Line #:** 16 **Code:** C

Original Comment #:

Comment: Critical wind speeds for which impacted materials will or will not be placed into the OSDF have not been determined. This critical wind speed should be determined as part of the air monitoring plan.

Response:

Action:

(10) **Commenting Organization:** Ohio EPA **Commentor:** OFFO
Section #: 6.2.1 **Pg #:** 6-1 **Line #:** 13-22 **Code:** C

Original Comment #:

Comment: The procedure indicated in this paragraph to implement dust control measures seems rather lengthy. Other DOE sites have implemented a "no visual emission" administrative level to control fugitive emissions. The length of time to implement the procedures in this paragraph would probably allow for exceedances of the rule.

Response:

Action:

(11) **Commenting Organization:** Ohio EPA **Commentor:** OFFO
Section #: 6.2.2 **Pg #:** 6-2 **Line #:** 9-12 **Code:** C

Original Comment #:

Comment: Will work stop if this situation is encountered? A corrective action plan should be in place to ensure that the schedule is not impacted by this possible situation.

Response:

Action:

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- (12) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.2.2 Pg #: 6-3 Line #: 1-3 Code: C
Original Comment #:
Comment: ALARA principles and OAC dictate that fugitive emissions be minimized through BAT. OEPA recommends that an administrative level of "no visible fugitive emissions" be adopted.
Response:
Action:
- (13) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.2.2 Pg #: 6-3 Line #: 6-8 Code: C
Original Comment #:
Comment: The potential risk was calculated based on 0.5 acres being exposed at any one time. The risk from accelerated clean-up and areas larger than 0.5 acres may increase the risk associated with this remedial action.
Response:
Action:
- (14) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.2.2 Pg #: 6-3 Line #: 9-16 Code: C
Original Comment #:
Comment: The predicted radionuclide concentrations are questionable (based 0.5 acre excavation). The dose estimate of 0.56 mrem/year may be underestimated.
Response:
Action:
- (15) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 6.4 Pg #: 6-5 Line #: n/a Code: C
Original Comment #:
Comment: The OEPA request reporting of baseline data prior to OSDF activities, as well as, quarterly reporting of data during OSDF activities. This request is consistent with the IEMP reporting mechanism.
Response:
Action: