



Department of Energy

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DOE-1061-97

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V- SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Thomas Schneider
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402

Dear Mr. Saric and Mr. Schneider:

IMPLEMENTATION SCHEDULE FOR THE INTEGRATED ENVIRONMENTAL MONITORING PLAN AIR PARTICULATE MONITORING PROGRAM AND REQUEST FOR APPROVAL OF PROPOSED PROGRAM MODIFICATIONS

Reference: Letter from Johnny W. Reising to James A. Saric and Tom Schneider, "Transmittal of Responses to the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency Comments on the Draft Final Integrated Environmental Monitoring Plan," dated May 23, 1997.

This letter serves to meet the commitment (Reference) for submitting the subject implementation schedule and describes proposed modifications to the air particulate monitoring program presented in the draft final Integrated Environmental Monitoring Plan (IEMP). The proposed changes are necessary since attempts at reaching agreement with local property owners for siting off-site air monitors have met with limited success. Furthermore, the proposed changes will address U.S. Environmental Protection Agency (U.S. EPA), Ohio Environmental Protection Agency (OEPA), and local stakeholder preference for maintaining existing fence line monitoring locations as discussed during the May 21, 1997, Fernald Citizens Task Force, Environmental Monitoring/Recycling Subcommittee meeting.

Program Modifications

As you are aware, in developing the monitoring-based approach for demonstrating National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart H compliance presented in the draft final IEMP, the Department of Energy, Fernald Environmental Management Project (DOE-FEMP) has been attempting to reach agreement with selected local property owners to place air monitoring stations on private property. These off-property monitoring locations were selected to coincide with the nearest potential receptor or group of receptors to the FEMP property in designated wind rose sectors (one location north and three locations east of the FEMP). This monitoring approach is consistent with guidance received from U.S. EPA and the compliance criteria specified under 40 CFR 61.94 (a). Since the 10 mrem NESHAP standard applies at the receptor location (i.e., residence, school, business or office), every effort was made to secure access at or near these off-property locations, however, to date, these efforts have not been successful. As a result, DOE proposes the following program modifications to expedite implementation of the air particulate monitoring program.

- 1) Place all monitors at the facility fence line (excluding background locations).
 - Move IEMP proposed AMS 28 from off-property to the FEMP north fence line (see map attached).
 - Replace IEMP proposed off-property AMS locations 29, 30, and 31 with existing east fence line monitors AMS 8A and AMS 3 and a new monitor location AMS 9C (AMS 9C results from moving existing AMS 9B south approximately 500 feet).
 - Add a new monitor (numbered AMS 29) to the east fence line south of AMS 3.
 - All other monitoring locations presented in the draft final IEMP will remain unchanged.
 - The resulting monitoring network will be comprised of 18 monitors rather than 17, as proposed in the draft final IEMP, and will incorporate the existing monitors on the east fence line.
 - DOE will report fence line data in the quarterly reports and annual compliance summary.
- 2) Report the estimated dose at the maximally exposed individual. This estimate, in conjunction with the fence line data, will provide information relating measured site emissions to the dose received by area residents.
 - Where the nearest receptor is located adjacent to the property boundary (primarily to the west and south), the fence line data will be converted to dose and reported as the dose received by the public.

- Where the nearest receptor resides at some distance from the property boundary (primarily north and east), the DOE will estimate the dose received by the public. A description of the modeling process used to generate this estimate will be included in the annual report.

The DOE requests the U.S. EPA and OEPA review of the proposed program modifications for inclusion in the final IEMP. Following approval of the modifications outlined above, change pages to the IEMP Section 6 and Appendix C will be issued.

Implementation Schedule

The DOE is moving forward to establish the new on-site monitoring locations identified in the draft final IEMP and the new fence line monitoring locations proposed above. This includes nine new locations on the FEMP fence line (AMS 9C and AMS 22 through AMS 29). An evaluation of the sight preparation and infrastructure requirements is currently underway and will be completed by the end of June 1997. The site preparation activities including fabrication and installation of monitor platforms, installation of electrical service, security fencing and access improvements will proceed during the summer and fall followed by preliminary operational tests. The monitoring network consisting of 18 high volume monitors will be fully operational on or before January 1, 1998. As such, the FEMP will utilize the original modeling-based approach for demonstrating NESHAP compliance for calendar year 1997 with the alternate monitoring-based approach commencing in January 1998.

Should you have any questions regarding this submittal, please contact Kathleen Nickel at (513) 648-3166.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

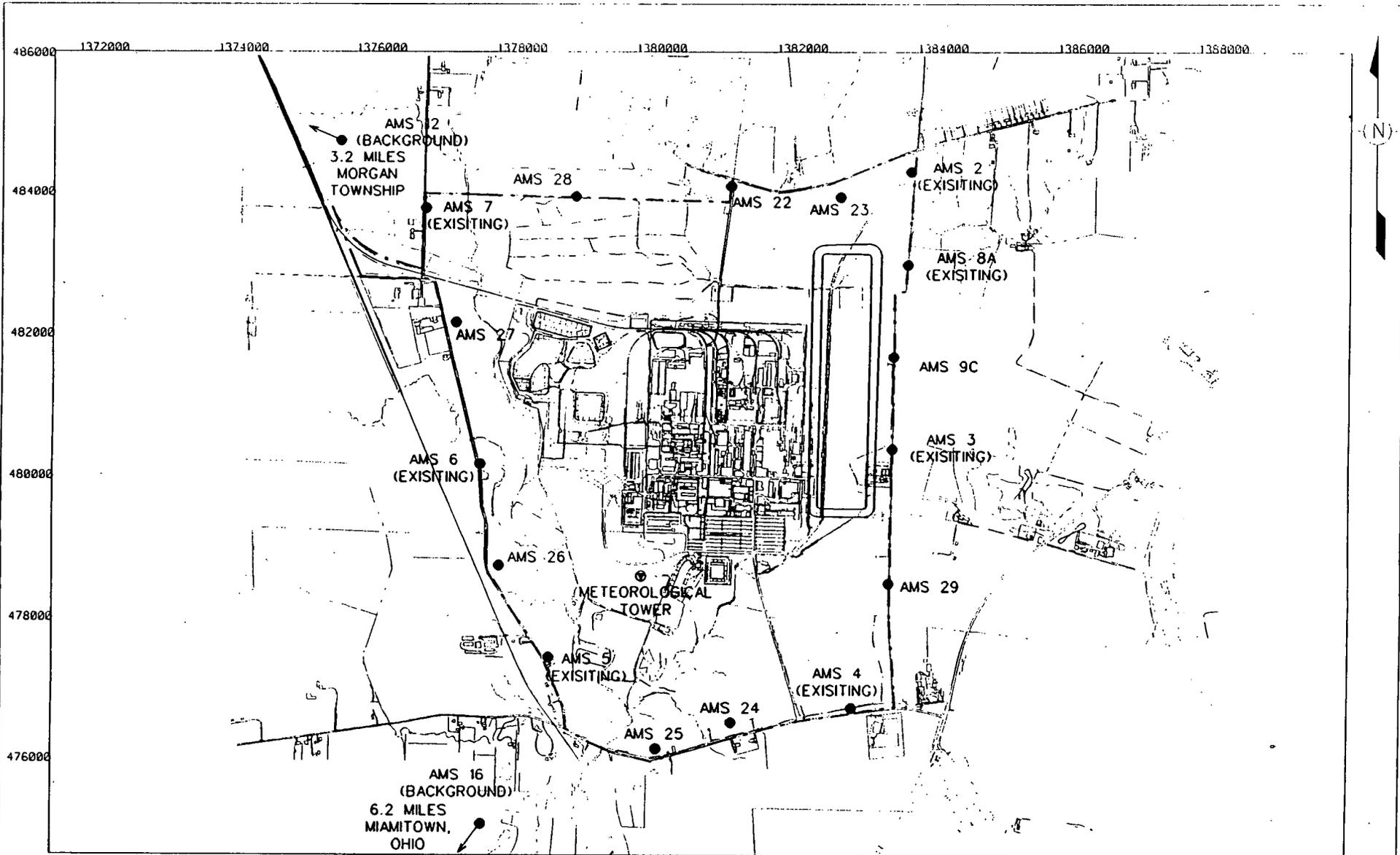
FEMP:Nickel

Enclosure: As Stated

cc w/enc:

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LEGEND:

- FEMP BOUNDARY
- PROPOSED AMS LOCATIONS
- ↖ DENOTES DISTANCE FROM CENTER OF PRODUCTION AREA TO OFF MAP LOCATION



FIGURE 6-2. LOCATION MAP FOR IEMP AIR MONITORING LOCATIONS