



State of Ohio Environmental Protection Agency

Southwest District Office

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LOC K-1992

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FILE: _____

George V. Voinovich
Governor

July 11, 1997

RE: DOE FEMP
MSL #531-0297
CONDITIONAL APPROVAL-
INTEGRATED ENVIRONMENTAL
MONITORING PLAN

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

Dear Mr. Reising:

Ohio EPA has reviewed the Integrated Environmental Monitoring Plan response to comments submitted by DOE on May 7, 1997 as well as those responses provided for Ohio EPA's supplemental comments. The responses adequately address Ohio EPA's concerns with the exception of the three attached comments. In addition, it will be necessary for USEPA to approve the NESHAP compliance aspects of the IEMP before the document is able to meet the objectives of the air monitoring portion. Therefore, Ohio EPA conditionally approves the document awaiting responses to the three attached comments and USEPA's acceptance of the proposed NESHAP compliance plan.

If you should have any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6543.

Sincerely,

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

cc: Jim Saric U.S. EPA
Terry Hagen, Fluor Daniel Fernald
Ruth Vandegrift, ODH
Bob Geiger, PRC
Dave Ward, Geotrans
Manager TPSS, DERR

Joe Bartoszek, OEPA
Mike Proffitt, OEPA

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(NICKEL/R)
PARTIAL
ACTION RESPONSE
TO DOE-0981-97
(10505)

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**RESPONSES TO OEPA SUPPLEMENTAL COMMENTS ON SECTION 6.0 OF THE
DRAFT FINAL INTEGRATED ENVIRONMENTAL MONITORING PLAN FOR
MARCH 1997**

Commenting Organization: Ohio EPA

Commentor: OFFO

Comment #: 1

Comment: Please provide a table that specifically indicates what individual air monitoring data will be reported in the quarterly IEMP report. Please include any and all of the individual project monitoring in this table.

Response:

Action:

Commenting Organization: Ohio EPA

Commentor: OFFO

Comment #: 17

Comment: Stating that the detection level is based on vendor information is not sufficient. Factors such as instrument background, environmental background, and count time (exposure time) must be included to show at what levels radon concentrations can be detected.

Response:

Action:

Commenting Organization: Ohio EPA

Commentor: OFFO

Comment #: 20

Comment: OEPA and USEPA are requesting the sampling procedures used for air monitoring for formal review as a part of FEMP "Application for Approval to Use Environmental Measurements to Demonstrate Compliance with NESHAPs Subpart H, dated May 23, 1997."

Although these procedures have been forwarded to the OEPA in the "recent" past DOE-FN may wish to update the high volume air sampling procedures due to the change in the use of data from environmental surveillance to compliance monitoring.

Response:

Action: