



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, OH 45402-2911

TELE: (937) 285-6357 FAX: (937) 285-6249

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

August 12, 1997

RE: DOE FEMP
DISAPPROVAL
THORIUM PROGENY
FRL ATTAINMENT

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

Dear Mr. Reising:

The Ohio Environmental Protection Agency and the Ohio Department of Health-Bureau of Radiation Protection have reviewed your letter "Use of Th-232 FRL as a basis for assessing attainment of all FRLs in the Thorium series." We found the discussion of secular equilibrium between thorium-232 and its progeny and the historical processes involving thorium to be persuasive. We concur that all members of the thorium series are very near to secular equilibrium. However, we are compelled to disapprove the use of thorium as a basis for certifying for its progeny for the following reasons:

1. The Operable Unit 5 Record of Decision and statements made to Stakeholders at public meetings both implied that each contaminant of concern would be individually determined.
2. The only difference between the proposal and the baseline is in the manner that existing data from the various decay processes is statistically manipulated. The proposal under consideration still would require that samples be taken and worked up in the laboratory.
3. Potential savings in time or costs for the new proposal over the standard methods used in Area 1, Phase 1 are minimal.

If you have any questions, please call Tom Ontko or me.
Sincerely,

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

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH

Manager, TPSS/DERR, CO
Dave Ward, HSI GeoTrans
Bob Geiger, PRC

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