



Restoration Management Corporation

*(now renamed Fluor Daniel Fernald)*P. O. Box 538704 Cincinnati, Ohio 45253-8704 (513) 648-3000

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Fernald Environmental Management Project
Letter No. C:FCDP(PSI):97-0059Mr. Paul Koval
Ohio EPA
Division of Air Pollution Control
1600 Watermark Drive
Columbus, Ohio 43215

Dear Mr. Koval:

**WRITTEN COMMENTS SUBMITTED ON THE OHIO EPA PROPOSED RULEMAKING TO AMEND
RULES 3745-20 OF THE OHIO ADMINISTRATIVE CODE, THE OHIO ASBESTOS CONTROL
RULES**In reviewing the proposed changes to the Ohio Asbestos Control Rules the following comments
are provided:

- * In 3745-20-01(21) the definition of Fugitive Source is not consistent with the previous definitions of "fugitive" used in the Ohio Administrative Code. As used in these other regulations, the only criteria for a source to be fugitive is not the lack of controls, but the lack of a definitive emission point.
- * In 3745-20-01(25) the definition of HEPA filter does not provide for using an alternate method of determining collection efficiency other than DOP. We are currently looking at PAO (Polyalphaolefin) as a substitute due to concerns about the health effects of DOP; please note that other facilities have converted to PAO.
- * In 3745-20-04(B)(2) there is no indication of how this training is to be provided. There appears to be a connection between this trained representative and the Asbestos Hazard Abatement Specialist in DOH 3701-34-01(H), but there is no reference.



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If you have any questions concerning these comments, please contact Ervin Fisher of my staff at (513)-648-5293.

Sincerely,

Lewis C. Goidell
Manager, Environmental Compliance
Project Support and Integration

LCG:EF:mhv

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