



**Department of Energy**

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**Mr. Michael Murphy, Health Physicist  
U.S. Environmental Protection Agency  
Air and Radiation Division  
77 West Jackson AE-17J  
Chicago, IL 60604-3590**

DOE-0082-99

Dear Mr. Murphy:

**RESPONSE TO ISSUES REGARDING NATIONAL EMISSION STANDARDS FOR  
HAZARDOUS AIR POLLUTANTS AIR MONITORING STATIONS**

This letter responds to a concern regarding National Emission Standards for Hazardous Air Pollutants (NESHAP) Air Monitoring Stations (AMS) 24 and 25 raised during the October 14, 1998, U.S. Environmental Protection Agency (U.S. EPA) site visit. The Department of Energy (DOE) had installed rubber matting on the security fencing around AMS 24 and AMS 25 in July 1998 in an effort to create a sound barrier between the monitors and nearby homeowners. The mats were hung on the sides of the monitoring stations opposite site activities and below the monitor intake so as not to obstruct air flow from excavation areas to the monitors; nevertheless, the matting is inconsistent with NESHAP siting criteria and has been removed.

During the site visit the noise disturbance cause by the monitors was discussed and an alternative to the matting was tentatively developed. The DOE proposed to move the monitors approximately 50 feet due north of their current locations and to plant trees along Willey Road as a buffer between the property owners and the air monitors.

While planning the monitoring station relocation and vegetative barrier complications were realized. The DOE contacted the effected homeowner to inform him of the proposal. The homeowner was not supportive of DOE's suggestion stating that it seemed immoderate. The extent to which the trees, which would need to be located at least 15 meters from the monitors, would provide a sound barrier was also questioned. The DOE recognized that the land would need to be certified to be below Final Remediation Levels (FRL) prior to planting the trees, delaying the immediate implementation of the barrier. Further discussions with the homeowner revealed that he would be willing to tolerate the inconvenience of the monitors if it were for a known and reasonable duration.

Mr. Michael Murphy

-2-

These issues were raised during the October 20, 1998, conference call with the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA). Mr. Gene Jablanowski stated that if after a year of monitoring no significant emissions were detected at AMS 24 and 25 the U.S. EPA would consider elimination of the monitors at these locations, which are primarily upwind from site activities. Correspondingly, excavations in the southern portion of the site adjacent to these monitors will be complete in a year further minimizing the need for monitors at these locations. Based on this information the DOE proposes to continue monitoring at these locations for one year. If no significant emissions are detected the DOE will propose elimination of the monitors. If elimination is not possible at that time the DOE will move forward with plans to move the monitors 50 feet to the north and plant the vegetative barrier. By that time, it is expected that the land will have been certified and planting can commence without delay.

If you have questions regarding this proposal please contact Kathleen Nickel at (513) 648-3166.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Nickel

## cc:

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