



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF

(AE-17J)

DEC 07 1998

Johnny W. Reising
 Fernald Remedial Action Project Manager
 United States Department of Energy
 Ohio Field Office
 Fernald Area Office
 P.O. Box 538705
 Cincinnati, Ohio 45253-8705

1884

RE: DOE-0082-99; Response to Issues
 Regarding National Emission Standards
 for Hazardous Air Pollutants Air
 Monitoring Stations

Dear Mr. Reising:

The United States Environmental Protection Agency (USEPA) appreciates your notification provided in your letter dated October 26, 1998, regarding unauthorized modifications to two of the air monitoring stations.

It is of concern to the USEPA that there was no prior discussion or indication that there would be any difficulties with the air monitoring stations that were to be used for compliance under the approved alternative methodology. The approval for this alternative methodology could be rescinded for this unapproved variance. However, the USEPA has decided to use its enforcement discretion in this instance and forebear enforcement actions at this time. If this type of action occurs again, the approved alternate methodology will be immediately rescinded and enforcement actions will be taken as deemed necessary by the USEPA Region 5 staff.

As for the proposal to move the monitors "50 feet due north of their current locations," there is no opposition in this placement of the monitors provided all of the citing criteria for these monitors are met.

These two monitors appear to have had a lengthy, approximately three to four month period, where the matting was in place. As this violates citing criteria, these two stations' data may not be used for compliance demonstration. This monitoring fails to

meet the 95 percent completeness requirement for data collection for compliance with guidance and approvals previously granted for this demonstration. At a minimum, another full year of data collection will be necessary prior to any consideration of discontinuing or re-siting of any of the air monitors for this compliance demonstration.

If you have any questions or need additional clarifications on any point included, feel free to contact me at (312) 353-6686.

Sincerely,



Michael H. Murphy, Health Physicist
Air and Radiation Division

cc: K. Nickel, FEMP
A. Tanner, OH-FEMP
T. Schneider, OEPA, OFFO
R. Vandegrift, ODH/BRP
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