



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

3094  
FERNALD

LOG A-1546

JUL 10 10 04 AM '00

FILE: 5090

REPLY TO THE ATTENTION OF: \_\_\_\_\_

JUL 06 2000

Mr. Johnny W. Reising  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

SRF-5J

RE: 1999 Integrated Site  
Environmental Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) 1999 Integrated Site Environmental Report. This document summarizes the sitewide environmental monitoring activities for 1999.

U.S. EPA finds the annual report acceptable. However, U.S. EPA has attached several minor comments that should be addressed in next year's annual environmental monitoring report.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric  
Remedial Project Manager  
Federal Facilities Section  
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO  
Bill Murphie, U.S. DOE-HDQ  
John Bradburne, Fluor Fernald  
Terry Hagen, Fluor Fernald  
Tim Poff, Fluor Fernald

TECHNICAL REVIEW COMMENTS ON  
"1999 INTEGRATED SITE ENVIRONMENTAL REPORT"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 2 Page #: 18 Line #: Not applicable (NA)  
Original Specific Comment #: 1

Comment: This section, which describes the current status of the site with respect to remediation and regulatory compliance, is well illustrated with photographs. However, the only captions on the photographs are identification numbers. Those familiar with the site can usually recognize what the photographs depict. However, others would enhance their understanding of the site if they could relate the pictures to the text. Brief captions should be added to the photographs, either adjacent to the photograph (preferred) or on a separate page that lists all photographs in the Table of Contents.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.4.1 Page #: 95 Line #: NA  
Original Specific Comment #: 2

Comment: Paragraph 5 discusses how 1998 and 1999 fourth quarter radon concentration results from exclusion fence line monitors were compared to evaluate the effectiveness of K-65 silo resealing activities completed in June 1999. Because resealing was completed during the second quarter of 1999, the report should either include a comparison of 1998 and 1999 third quarter data or provide an explanation of why this comparison was not made.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.5 Page #: 97 Line #: NA  
Original Specific Comment #: 3

Comment: The discussion of direct radiation monitoring results in paragraphs 1 and 2 could be improved by (1) stating that these results are summarized quarterly; (2) explaining that unlike radiological air particulate and radon results, there are no specific regulatory limits to which the direct radiation results can be compared; and (3) indicating that these results are used in the direct radiation dose calculations discussed in Section 6.2.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.5 Page #: 100 Line #: NA

Original Specific Comment #: 4

Comment: Figure 5-8, which shows data from 1994 to the present, does not support the statement made on Page 98, Paragraph 1, that current direct radiation measurements are well below the levels observed prior to the 1991 addition of bentonite to the K-65 silos. The figure should be extended to show direct radiation data from the pre-1991 time period.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.7 Page #: 103 Line #: NA

Original Specific Comment #: 5

Comment: This section could be improved by making the following changes:

- Clarifying that an "excursion in opacity" is a measured or observed opacity reading that exceeds a permit or regulatory limit
- Clarifying the basis for the carbon monoxide emission estimate: the text states that the estimate is based on stack test results but Table 5-5 indicates that the estimate is based on a published emission factor
- Replacing the term "FEMP industrial processes" with "the FEMP boiler plant" in the last sentence of the third paragraph

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 7.3 Page #: 115 Line #: NA

Original Specific Comment #: 6

Comment: The section describes various planting activities that are part of the ecological restoration activities. Some of these activities are early stages of the site restoration, and others are experimental activities to evaluate future restoration options. Future annual reports should include photographs of areas where these planting activities were conducted.