



Department of Energy

Ohio Field Office
Fernald Area Office

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29 MAY 2001

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0595-01

Mr. Thomas J. Schneider, Project Manager
Ohio Environmental Protection Agency
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

PERMIT INFORMATION SUMMARY FOR REPACKAGING ENRICHED URANIUM COMPOUNDS

This notification is being provided to inform your office that the United States Department of Energy (DOE) is planning to repackage drums of enriched uranium compounds into new drums for off-site shipment and storage. Approximately 786,000 pounds of compounds will be repackaged. The repackaging, and then the removal of the material from the Fernald Environmental Management Project (FEMP), is part of the remedial action to clean up the site. The material will be shipped to the DOE site in Portsmouth, Ohio. Some material may eventually be reused for programmatic purposes or sold. Drum repackaging will occur in Building 56A. It is located in the northwest quadrant of the FEMP's former processing plants and is adjacent to, and due north of, the Plant 1 Storage Pad.

Repackaging will take place inside ventilated stations that have been specifically purchased for this project. Fluor Fernald, Inc. may install up to three such stations for this project. Attached to each station is an industrial grade vacuum cleaner head that will be used to vacuum transfer the material from existing steel drums into new steel drums. Each vacuum head and ventilation system is equipped with High-Efficiency Particulate Air (HEPA) filtration.

The ventilation system for each station will discharge into Building 56A. The stations are portable, allowing them to be relocated in a different building for future projects. CAP88 PC modeling of the ventilation system exhausts has identified them as having a potential effective dose equivalent (EDE) less than 1% of the standard, and does not require continuous emission measurement. The industrial vacuum cleaner exhaust heads are by nature fugitive sources (because they have no exhaust stack or vent, nor can they be fitted with one). They also discharge into Building 56A.

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Prior to placement in the stations, some drums will be opened and their contents inspected in a separate booth ventilated by a portable HEPA ventilation device. The portable device will discharge outside of Building 56A. CAP88 PC modeling of the device's exhaust calculated the potential EDE to be less than 1% of the standard. Therefore, it does not require continuous emission measurement.

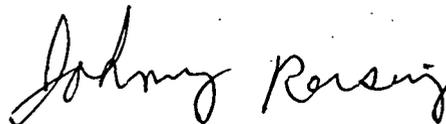
These activities will take place within the fence-line boundary of the former processing facility. Dose caused by airborne contamination to members of the public will be measured using the site-wide ambient monitors installed for the Integrated Environmental Monitoring Plan (IEMP). The IEMP has been approved by the United States Environmental Protection Agency (USEPA), Region V.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121(e)(1) states that no federal, state, and local permit shall be required for the portion of any removal or remedial action conducted entirely on site, where such remedial action is selected and carried out in compliance with Section 121. Repackaging of the compounds is being completed in support of the remedial action to clean up the FEMP and will be carried out in compliance with Section 121. Therefore, this project is not required to obtain any federal, state, or local permits. The project must, however, be conducted in accordance with the terms and conditions of those permits that otherwise would be required.

Section XIII.B of the Amended Consent Agreement requires the DOE to identify those permits that otherwise would be required along with the standards, requirements, criteria, or limitations that would have to be met in order to obtain a permit. The DOE must report these findings to the USEPA along with an explanation of how the response action will meet these standards, requirements, criteria, or limitations. The enclosed Permit Information Summary identifies permits and associated requirements that are applicable to the repackaging project.

Should you have any questions or require additional information, please contact Ed Skintik at (513) 648-3151.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Skintik

Enclosure: As stated

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cc w/enclosure:

N. Hallein, EM-31/CLOV

G. Jablonowski, USEPA

T. Schneider OEPA-Dayton (three copies of enclosure)

F. Bell, ATSDR

F. Hodge, Tetra Tech

M. Schupe, HSI GeoTrans

R. Vandegrift, ODH

AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

A. Tanner, OH/FEMP

D. Carr, Fluor Fernald, Inc./MS2

T. Hagen, Fluor Fernald, Inc./MS65-2

R. Palmer, Fluor Fernald, Inc./MS65-2

T. Poff, Fluor Fernald, Inc./MS65-2

C. Weekley, Fluor Fernald, Inc./MS50

ECDC, Fluor Fernald, Inc./MS52-7

PERMIT INFORMATION SUMMARY

Project Description: URANIUM COMPOUNDS REPACKAGING AT BUILDING 56A

Identification of Permits for which the administrative requirements have been waived by CERCLA Section 121(e) (1).	Identification of Standards, Requirements, Criteria, or Limitations normally required by waived permits.	Actions used to meet requirements of waived permits.
OAC 3745-31-02: PERMIT TO INSTALL AN AIR CONTAMINANT SOURCE.	A Permit to Install is required for all new or modified sources that has the potential to emit pollutants. The best available technology (BAT) is required to control emissions.	BAT will be used to control emissions. Since this activity has the potential to emit radionuclides, BAT is HEPA filters. Initial and periodic in-place testing of the HEPA filters will also be performed.
OAC 3745-35-02: PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE.	A Permit to Operate is required for all new or modified sources that has the potential to emit pollutants.	BAT will be used to control emissions. Differential pressure across the HEPA filters will be monitored continuously and action set-points established.
40 CFR 61.90-97: NESHAP Subpart H NATIONAL EMISSION STANDARD FOR EMISSION OF RADIONUCLIDES OTHER THAN RADON FROM DOE FACILITIES.	40 CFR 61.92 Standard: Emissions from project must not cause site to exceed 10 mrem/year dose to any member of the public.	The activity is within the fence-line boundary of the site. Ambient monitors installed around the FEMP and operated in accordance with the requirements of the LEMP will measure the dose caused by the project to members of the public.
40 CFR 61.90-97: NESHAP Subpart H NATIONAL EMISSION STANDARD FOR EMISSION OF RADIONUCLIDES OTHER THAN RADON FROM DOE FACILITIES.	40 CFR 61.93(b) Emission rate measurement: Stacks/vents which have the potential under normal operating conditions but without any emission control devices operating, to release radionuclides in sufficient quantity as would cause an Effective Dose Equivalent to a member of the public of 0.1 mrem/year or greater shall have a continuous emission monitor/sampler system installed and operated. Other stacks/vents will need to have periodic confirmatory measurements conducted to verify their projected low emission/dose impact status.	Dispersion modeling in accordance with 40 CFR 61.93(b)(4)(iii) estimated an EDE less than 1% of the standard. Therefore continuous emission measurements will not be required. Periodic confirmatory measurement of ventilation system vents shall be performed. Fugitive source emissions will be identified using the FEMP occupational air monitoring plan.

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