



State of Ohio Environmental Protection Agency

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Southwest District Office

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2002 OCT 10 A 10:27
Bob Taft, Governor
Maureen O'Connor, Lt. Governor
Christopher Jones, Director

October 9, 2002

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

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**Re: COMMENTS - Remedial Action Work Plan for Radon Control System (RCS)
Phase 1 Operation**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's submittal, "Remedial Action Work Plan for Radon Control System (RCS) Phase 1 Operation" received on September 9, 2002. Our comments are attached.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Mary Wojceichowski, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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Ohio EPA Comments on:

**Remedial Action Work Plan for
Radon Control System (RCS) Phase 1 Operation
Revision 3, September 2002**

General Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: The RA Work Plan now states that the RCS will be operated intermittently during Phase 1. The AWR RD (Section 3.6.2) states that the RCS will maintain radiation fields below 50 mrem/hr during non-construction periods of Phase 1 and below 10 mrem/hr during construction periods of Phase 1. The design requirements should be stated in the RA Work Plan as the criteria for intermittent operation.
Response:
Action:

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: The RA Work Plan now states that the RCS will be operated intermittently during Phase 1. A number of issues may be raised concerning this type of operation:
A. Was the RCS designed for intermittent operation?
B. Wouldn't longer runs be beneficial as experienced gained for the future phases of operation?
C. Continuous operation would lower environmental and work area radon concentrations, which would be consistent with ALARA.
Response:
Action:

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3. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: na Pg #: na Line #: na Code: C
Original Comment #:
Comment: The RA Work Plan does not include the involvement of Hamilton County Environmental Services to perform/observe stack tests. This involvement verifies test methods, sample collection, and port locations. How will these stack tests be incorporated into the RA Work Plan.
Response:
Action:

Specific Comments:

4. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 3 Pg #: 6 Line #: 3-9 Code: C
Original Comment #:
Comment: The language for when intermittent operation of the RCS is ambiguous. Phrases such as "moderate or significant job duration and exposure potential" should be replaced with actual dose rates and/or stay times.
Response:
Action: