



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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Mr. Johnny W. Reising  
United States Department of Energy  
Fernald Area Office  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF

Subject: Radon Control System

Dear Mr. Reising:

U.S. EPA acknowledges DOE's start up and temporary running of the Radon Control System (RCS) on December 6 and 7, 2002. U.S. EPA is concerned by the absence of a formal plan for testing the RCS during the "Hot Test Phase." U.S. EPA was under the impression that DOE would be using the time following initial startup to conduct a series of testing and training runs to ensure the facility and operators were prepared to operate continuously in support of AWR transfer facility construction and material transfer.

The Operable Unit 4 K-65 Removal Action #4 Final Report (May 1994) states that should the combined radon headspace concentrations for Silos 1 and 2 reach a value of  $9 \times 10^6$  pCi/l, further actions to reduce radon headspace concentrations would be implemented by DOE. Data provided to EPA and the public indicates that the combined radon headspace concentrations for Silos 1 and 2 exceed  $36 \times 10^6$  pCi/l in the absence of RCS operation. It appears that continuous operation of the RCS should reduce the combined radon headspace concentrations for Silos 1 and 2 to acceptable levels. DOE should therefore run the RCS continuously until completion of Silo 1 and 2 material transfer and treatment operations; this should address DOE's removal action goals and obligations under Removal Action #4.

U.S. EPA clearly expects DOE to have properly tested the facility and trained the operators prior to initiating continuous operation. Such testing should include long periods of sustained operation at expected operating capacity ranges. Additionally, it should be clear to DOE that the agencies expect the system to be operating on a continuous basis prior to and following breaching the silo domes or removing the foam covered caps from the silos.

In order to ensure DOE completes RCS operations testing in time for continuous operation to support RCS construction activities, DOE should develop and submit a schedule and plan for testing of the RCS. Considering that DOE hopes to conduct construction activities on and around the silo domes in early 2003, the agencies expect this schedule and plan will be completed in the very near future. If you have any questions or concerns, please contact me at (312) 886-4591.

Sincerely,

Gene Jablonowski  
Project Manager  
Federal Facilities Section  
Superfund Division