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**CHANGE TO THE OPERABLE UNIT 3 BUILDING 4A IMPLEMENTATION  
PLAN FOR THE ABOVE GRADE DECONTAMINATION AND DISMANTLEMENT**

08/07/95

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LETTER



**Department of Energy**  
**Fernald Environmental Management Project**  
 P. O. Box 538705  
 Cincinnati, Ohio 45253-8705  
 (513) 648-3155

AUG 07 1995

DOE-1245-95

Mr. James A. Saric, Remedial Project Director  
 U.S. Environmental Protection Agency  
 Region V - 5HRE-8J  
 77 W. Jackson Boulevard  
 Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager  
 Ohio Environmental Protection Agency  
 401 East 5th Street  
 Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**CHANGE TO THE OPERABLE UNIT 3 BUILDING 4A IMPLEMENTATION PLAN FOR ABOVE-GRADE DECONTAMINATION AND DISMANTLEMENT**

The intent of this letter is to request your concurrence to a change to the Operable Unit 3 (OU3) Building 4A Implementation Plan for Above-Grade Decontamination and Dismantlement for supplemental radiological air monitoring. Air quality monitoring that is being performed during the Building 4A decontamination and dismantlement project includes two programs: 1) The current site-wide monitoring program plan, and 2) the Supplemental Radiological Air Monitoring Program, specifically designed for the decontamination and dismantlement of Building 4A as discussed in Section 3.7.3 of the OU3 Remedial Design/Remedial Action (RD/RA) Work Plan. The OU3 Building 4A Implementation Plan for Above-Grade Decontamination and Dismantlement (Final, March 1995) further defines the Supplemental Radiological Air Monitoring Program. Section 2.3 of the OU3 Building Implementation Plan states:

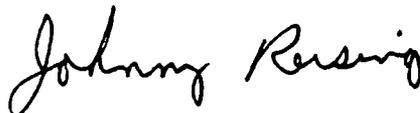
"Based on the factors listed in Section 3.7.3 of the OU3 RD/RA Work Plan, air emissions modeling was performed to determine the potential emissions from remediation. The results of that modeling effort indicate levels of radiological emission will not exceed the 0.1 mrem/year threshold at the project boundary that would require continuous emissions monitoring. However, as a conservative measure to ensure protection of human health and the environment, eight continuous air monitors will be employed to supplement current site-wide air monitoring on a continual basis surrounding the project boundaries during the interim remedial action. These monitoring locations for Building 4A are identified in Figure 2-1."

Prior to placing the monitors in the field, the location and the number of continuous air monitors required to meet the intent of the OU3 RD/RA Work Plan and Building 4A Implementation Plan (IP) were further reviewed. The review was based on the following factors: Expected dispersion of airborne releases, representativeness of the monitoring locations; the potential hazard of the material to be released; and accessibility to the monitoring station. Based on this review, it was determined that seven continuous monitors were adequate to meet the requirements of the OU3 RD/RA Work Plan and Building 4A IP. The Building 4A enclosed Figure 2-1 indicates a monitor should be placed on both the west wall and the south wall of Building 12A. These locations have been combined and a single monitor has been employed along the south wall of Building 12A, west of the original location located along the south wall. The original locations are in close proximity to one another and it appears would add no additional value to the air monitoring program. The new location will provide data that is representative of the two previously proposed locations. The new location increases the accessibility to the air monitoring station for maintenance and calibration without sacrificing the ability to detect the anticipated dispersion of airborne releases. Combining these two monitoring locations will not decrease the ability of the monitoring program to meet the OU3 RD/RA Work Plan objectives. Also, enclosed are the summary analytical results for the seven monitoring locations for April, May, and June.

As stated in Section 4.6.5, Remedial Action Reports, of the OU3 RD/RA Work Plan, any modifications to the OU3 RD/RA Work Plan and/or IP is required to be documented in the Remedial Action Report. This change to the Supplemental Radiological Air Monitoring Program will be documented in the Building 4A Remedial Action Report.

If you are not in agreement with this change or have any questions, please contact Anand Shah at (513) 648-3146.

Sincerely,



*for* Jack R. Craig  
Fernald Remedial Action  
Project Manager

FN:Shah

Enclosure: As Stated

cc w/enc:

K. H. Chaney, EM-423/GTN  
B. Skokan, EM-423/GTN  
G. Jablonowski, USEPA-V, 5HRE-8J  
J. Kwasniewski, OEPA-Columbus  
P. Harris, OEPA-Dayton  
M. Proffitt, OEPA-Dayton  
S. McClellan, PRC  
R. Cohen, GeoTrans  
F. Bell, ATSDR  
R. Owen, ODOH  
R. D. George, FERMCO/52-2  
T. Hagen, FERMCO/65-2  
AR Coordinator, FERMCO

cc w/o enc:

C. Little, FERMCO  
M. Yates, FERMCO/9

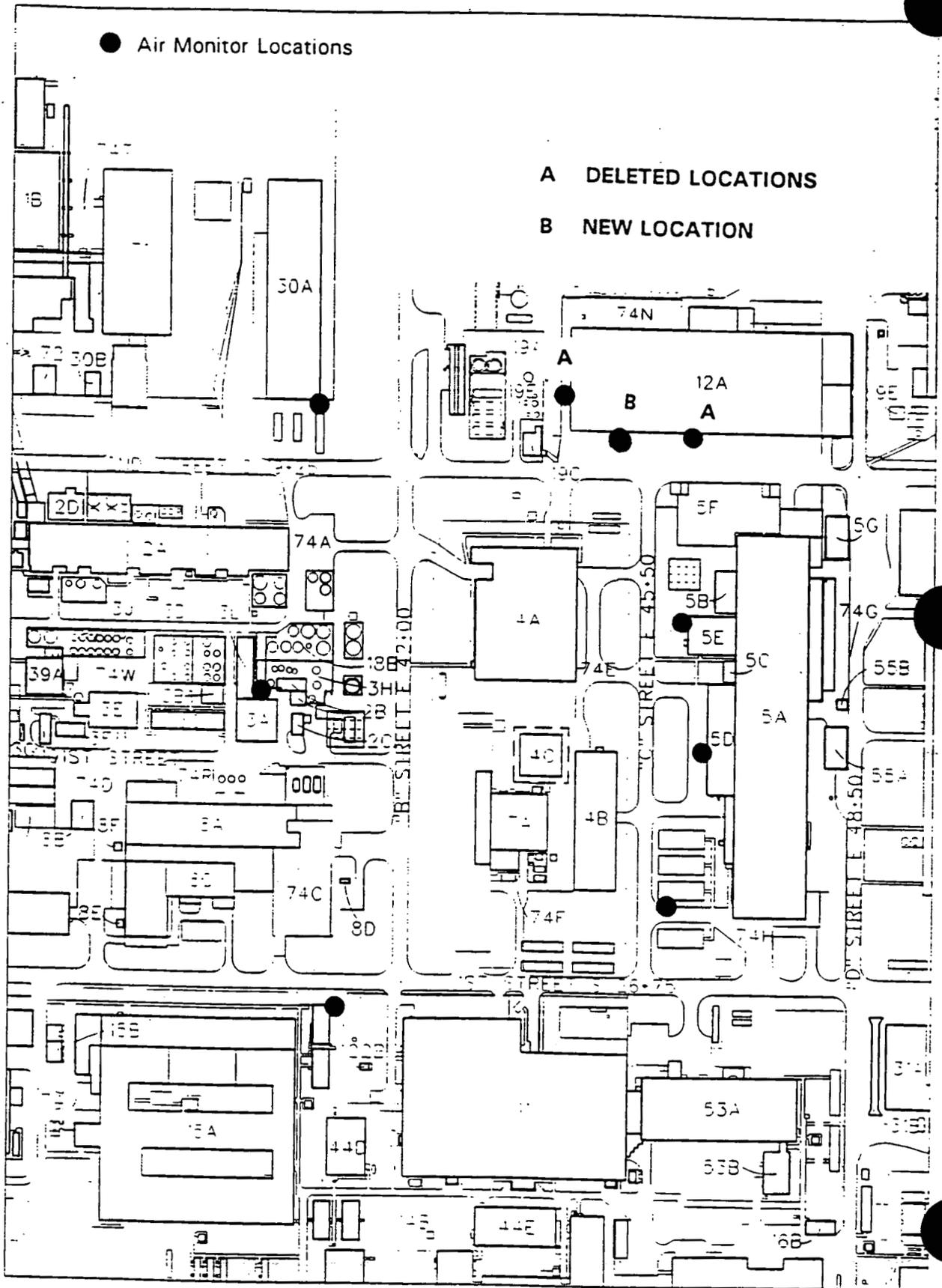


FIGURE 2-1 Proposed Locations For Plant 4 Complex Air Monitors



**SUMMARY REPORT – URANIUM IN AIR**  
Plant – 4 Monitoring Locations

**Analytical results for April 1995**

AMS Location	Uranium concentration (pCi/m <sup>3</sup> )			
	04/07/95	04/13/95	04/21/95	04/28/95
P4-1	2.33E-03	1.27E-03	6.88E-04	7.92E-04
P4-2	3.96E-03	2.55E-03	1.53E-03	5.45E-04
P4-3		1.56E-03	1.18E-03	1.07E-03
P4-4	2.81E-03	1.61E-03	9.45E-04	7.42E-04
P4-5			7.01E-04	7.21E-04
P4-6	1.90E-03	7.82E-04	5.75E-04	1.54E-03
P4-7	4.66E-03	2.83E-04	1.19E-03	2.64E-04

P4-1, 2, 4, 6, and 7 placed in service on March 24, 1995.  
 P4-3 placed in service on April 13, 1995.  
 P4-5 placed in service on April 21, 1995.

**Cumulative Averages**

AMS Location	Average pCi/m <sup>3</sup>
P4-1	1.33E-03
P4-2	2.42E-03
P4-3	1.27E-03
P4-4	1.70E-03
P4-5	7.11E-04
P4-6	1.30E-03
P4-7	2.18E-03

**SUMMARY REPORT - URANIUM IN AIR**  
Plant - 4 Monitoring Locations

**Analytical results for May 1995**

AMS Location	Uranium concentration (pCi/m <sup>3</sup> )			
	05/05/95	05/12/95	05/19/95	05/26/95
P4-1	1.49E-03	6.72E-04	6.97E-04	1.13E-03
P4-2	1.35E-03	2.25E-03	1.88E-03	3.67E-03
P4-3	4.84E-04	1.94E-03	1.26E-03	1.44E-03
P4-4	1.35E-03	2.18E-03	1.20E-03	2.07E-03
P4-5	6.70E-04	1.61E-03	1.05E-03	2.15E-03
P4-6	2.32E-04	5.34E-04	5.12E-04	7.28E-04
P4-7	8.48E-05	1.56E-03	5.73E-04	1.97E-03

**Cumulative Averages**

AMS Location	Average pCi/m <sup>3</sup>
P4-1	1.18E-03
P4-2	2.36E-03
P4-3	1.28E-03
P4-4	1.70E-03
P4-5	1.15E-03
P4-6	9.45E-04
P4-7	1.68E-03

P4-1, 2, 4, 6, and 7 placed in service on March 24, 1995.  
 P4-3 placed in service on April 13, 1995.  
 P4-5 placed in service on April 21, 1995.

**SUMMARY REPORT – URANIUM IN AIR**  
Plant – 4 Monitoring Locations

**Analytical results for June 1995**

AMS Location	Uranium concentration (pCi/m <sup>3</sup> )					
	06/02/95	06/09/95	06/16/95	06/23/95	06/30/95	
P4-1	1.94E-03	1.28E-03	1.19E-03	1.37E-03	6.04E-04	
P4-2	1.79E-03	5.27E-03	6.78E-04	2.68E-03	3.24E-03	
P4-3	1.16E-03	3.29E-03	2.54E-03	3.08E-03	1.95E-03	
P4-4	8.27E-04	2.98E-03	1.80E-03	2.58E-03	2.49E-03	
P4-5	1.05E-03	3.51E-03	1.22E-02	6.52E-03	2.90E-03	
P4-6	8.97E-04	2.93E-04	1.27E-03	1.16E-03	5.72E-04	
P4-7	1.10E-03	5.08E-03	1.95E-03	3.18E-03	1.53E-03	

**Cumulative Averages**

AMS Location	Average pCi/m <sup>3</sup>
P4-1	1.22E-03
P4-2	2.49E-03
P4-3	1.75E-03
P4-4	1.85E-03
P4-5	3.01E-03
P4-6	9.07E-04
P4-7	2.00E-03

P4-1, 2, 4, 6, and 7 placed in service on March 24, 1995.

P4-3 placed in service on April 13, 1995.

P4-5 placed in service on April 21, 1995.