



Department of Energy
Office of Legacy Management

May 27, 2008

Ms. Eleanor Thornton
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Mailstop 6608J
Washington, DC 20460

Dear Ms. Thornton:

**Subject: 2007 NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR
POLLUTANTS ANNUAL REPORT FOR THE FERNALD PRESERVE**

Reference: United States Environmental Protection Agency letter, Jack Barnett to Johnny Reising, "Application for Approval to Use environmental Measurements to Demonstrate Compliance with the National Emission Standards for Hazardous Air Pollutants, Subpart H," dated August 11, 1997

This letter transmits the 2007 National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart H Annual Report for the Fernald Preserve to the United States Environment Protection Agency (USEPA). This documents fulfills the annual reporting requirements of 40 CFR 61.94(a) for the Fernald Preserve. Furthermore, as committed to in Attachment D of the Fernald Preserve Legacy Management and Institutional Controls Plan (i.e., Integrated Environmental Monitoring Plan [IEMP]), the 2007 NESHAP Annual report has been included as Appendix D of the Site Environmental Report (SER) for calendar year 2007 and will be available to Fernald Preserve stakeholders through distribution of the SER in June 2008.

The 2007 report marks the ninth consecutive year that Fernald Preserve has used an alternate, monitoring-based approach for demonstrating compliance with the NESHAP Subpart H requirements. Prior to 1998, annual reports used emission estimates and computer modeling to demonstrate compliance. The alternate approach, which relies on measurements of airborne radiological air particulate concentrations for calculating a maximum effective dose equivalent at the Fernald Preserve boundary, was approved by the USEPA in the referenced letter and is detailed in Chapter 6 of the IEMP.

Based on 2007 radiological air particulate monitoring data, the maximum effective dose equivalent at the Fernald Preserve boundary due to the air inhalation pathway was calculated to be 0.023 millirem (mrem) above background at a monitoring location along the southern boundary of the site. This is in compliance with the NESHAP Subpart H standard of 10 mrem.

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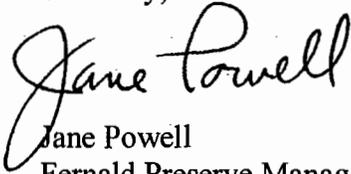
REPLY TO: Harrison Office

Ms. Eleanor Thornton

Page 2

If you have any questions, please call me (513) 648-3148.

Sincerely,



Jane Powell
Fernald Preserve Manager
DOE-LM-20.1

Enclosure

cc w/enclosure:

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Project File 140.10(A) (Thru W. Sumner)

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P. J. Sturdevant, HCDES

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Fernald Preserve

**2007 National Emissions Standards
For Hazardous Air Pollutants (NESHAP)
Annual Report**

May 2008



**U.S. Department
of Energy**

Office of Legacy Management

**U.S. Department of Energy
Radionuclide Air Emissions Annual Report
(Under Subpart H of 40 Code of Federal Regulations Part 61)
Calendar Year 2007**

Site Name: Fernald Preserve, Fernald, Ohio

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Operating

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Contents

Acronyms.....	v
Introduction.....	vii
Summary.....	vii
1.0 Facility Information	1
1.1 Site Description.....	1
1.2 Source Descriptions	1
1.3 Radiological Air Particulate Monitoring Program Description	1
1.3.1 Monitoring Equipment and Locations	3
1.3.2 Analytical Regime and Sampling Frequency	4
1.3.3 Air Emission Data Reporting.....	4
2.0 Air Emissions Data	5
2.1 Air Monitoring Data Completeness Status	5
2.2 Air Monitoring Station Operational Performance	5
3.0 Dose Assessment	5
4.0 Compliance Assessment	7
5.0 Additional Information	7
5.1 Meteorological Data.....	7
5.2 Construction/Modifications at the Fernald Preserve.....	7
6.0 References.....	7
7.0 Certification	8

Tables

Table 1. CY 2007 Net Air Concentrations.....	5
Table 2. CY 2007 Operational Summary for Air Particulate Monitoring Stations	6
Table 3. 2007 Annual NESHAP Compliance Ratios.....	6

Figures

Figure 1. Radiological Air Monitoring Locations	2
Figure 2. Five Year Average (2002 – 2006) Wind Rose, 33-ft (10-m) Height	3

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Acronyms

AMS	air monitoring station
°C	degrees Celsius
CFR	Code of Federal Regulations
cm	centimeter
CY	calendar year
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
FCP	Fernald Closure Project
ft ³ /min.	cubic feet per minute
IEMP	Integrated Environmental Monitoring Plan
km	kilometer
m ³ /min.	cubic meters per minute
mrem	millirem
mSv	milliSieverts
NESHAP	National Emission Standards for Hazardous Air Pollutants
OEPA	Ohio Environmental Protection Agency
pCi/m ³	picoCuries per cubic meter
USC	United States Code

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Introduction

On May 23, 1997, the U.S. Department of Energy (DOE) Fernald Closure Project (FCP) submitted a written request to the U.S. Environmental Protection Agency (EPA) for approval to use an alternate approach for demonstrating compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart H requirements (DOE 1997). The alternate approach uses environmental measurements of airborne radionuclide concentrations (as provided for under 40 CFR 61.93[b][5]), rather than air dispersion modeling, to demonstrate that radionuclide emissions resulting from operations at the former Fernald Closure Project (FCP) were below the annual NESHAP Subpart H standard. The request for approval of the alternative approach was driven by the recognition that the dominant sources of radiological emissions at the Fernald site had changed as the mission of the site changed from uranium metal production (which ended in 1989) to environmental remediation (which ended in 2006 for all projects except aquifer restoration). During production, the primary emission sources from the facility were point sources (stacks and vents), and during environmental remediation the dominant sources were fugitive emissions from large-scale excavations, wind erosion from stockpiled materials, and decontamination and dismantling activities. Presently, the Fernald Preserve is a wildlife preserve and the dominant emission source is soil.

Because there was a high degree of uncertainty associated with modeling fugitive emissions during the environmental remediation activities, environmental measurements were proposed as an alternative to provide a more accurate assessment of the site's emissions. On August 11, 1997, the EPA granted approval to use environmental measurements as an alternative methodology for demonstrating NESHAP compliance (EPA 1997). The FCP began using environmental measurements for NESHAP compliance purposes in 1998.

Summary

For calendar year (CY) 2007, the maximum effective dose equivalent from emissions of radionuclides to the ambient air is estimated to be 0.023 millirem (mrem/yr) (0.00023 millisieverts [mSv/yr]) above background, which is in compliance with the Subpart H standard of less than 10 mrem/yr (0.1 mSv/yr) above background. This estimate is based on the Fernald Preserve's radiological air particulate monitoring program, which consists of five high-volume air monitoring stations (AMS) operated at the Fernald Preserve boundary and one background location. With the 2006 completion of the site remedial actions associated with building demolition, soil excavation and construction of the OSDF, monitoring was discontinued at 11 of the initial 16 boundary locations. Six boundary stations were discontinued in April 2006, and an additional five boundary stations were shut down in December 2006.

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1.0 Facility Information

1.1 Site Description

The Fernald Preserve is located on a 1,050-acre (425-hectare) area approximately 18 miles (29 kilometers [km]) northwest of downtown Cincinnati, Ohio, just north of the small farming community of Fernald, Ohio (Figure 1). A former production area covered approximately 136 acres (55 hectares) in the center of the Fernald Preserve, which is located outside of the 500-year flood plain of the Great Miami River in an ancestral river valley known as the New Haven Trough. The area immediately surrounding the Fernald Preserve is rural in nature and characterized by the predominance of agriculture, with some light industry and private residences.

The climate is characterized as continental to subtropical, with average temperatures ranging from approximately 31 °F (-0.7 °C) in December to 76 °F (25 °C) in July. Average annual precipitation is approximately 40 inches (102 centimeters [cm]). Prevailing wind flow is from the southwest (Figure 2).

For 37 years, the former Feed Materials Production Center produced uranium metal products for DOE and its predecessors. On July 10, 1989, uranium metal production was suspended and management responsibilities at the Fernald site were transferred from the Defense Programs to the DOE's Office of Environmental Restoration and Waste Management.

Remedial action activities at the Fernald site were conducted under the Comprehensive Environmental Response, Compensation, and Liability Act. These activities included sample analysis; waste characterization; the management, treatment, storage, and disposal of hazardous, mixed, low-level and solid wastes; the decontamination and demolition of radioactively contaminated equipment and buildings, and clean-up of the contaminated soil and groundwater. The site also managed containerized thorium wastes and the K-65 Silos waste material, which contained radium. All remedial actions, with the exception of groundwater restoration, were completed in 2006.

1.2 Source Descriptions

For CY 2007, wind erosion of soil is the only potential radionuclide emission source at the Fernald Preserve. The primary radioactive airborne contaminants at the Fernald Preserve consist of radium, thorium and uranium isotopes that are present in soil at concentrations near background values. Additional radioactive isotopes in the soil consist of daughter products from the uranium (235 & 238) and thorium decay chains.

1.3 Radiological Air Particulate Monitoring Program Description

The Fernald Preserve's radiological air monitoring program for CY 2007 is defined in Attachment D (Integrated Environmental Monitoring Plan [IEMP]) of the 2006 Comprehensive Legacy Management and Institutional Controls Plan, Revision 1 (DOE 2006a). The program design applicable to air monitoring, as approved by the EPA, is summarized as follows:

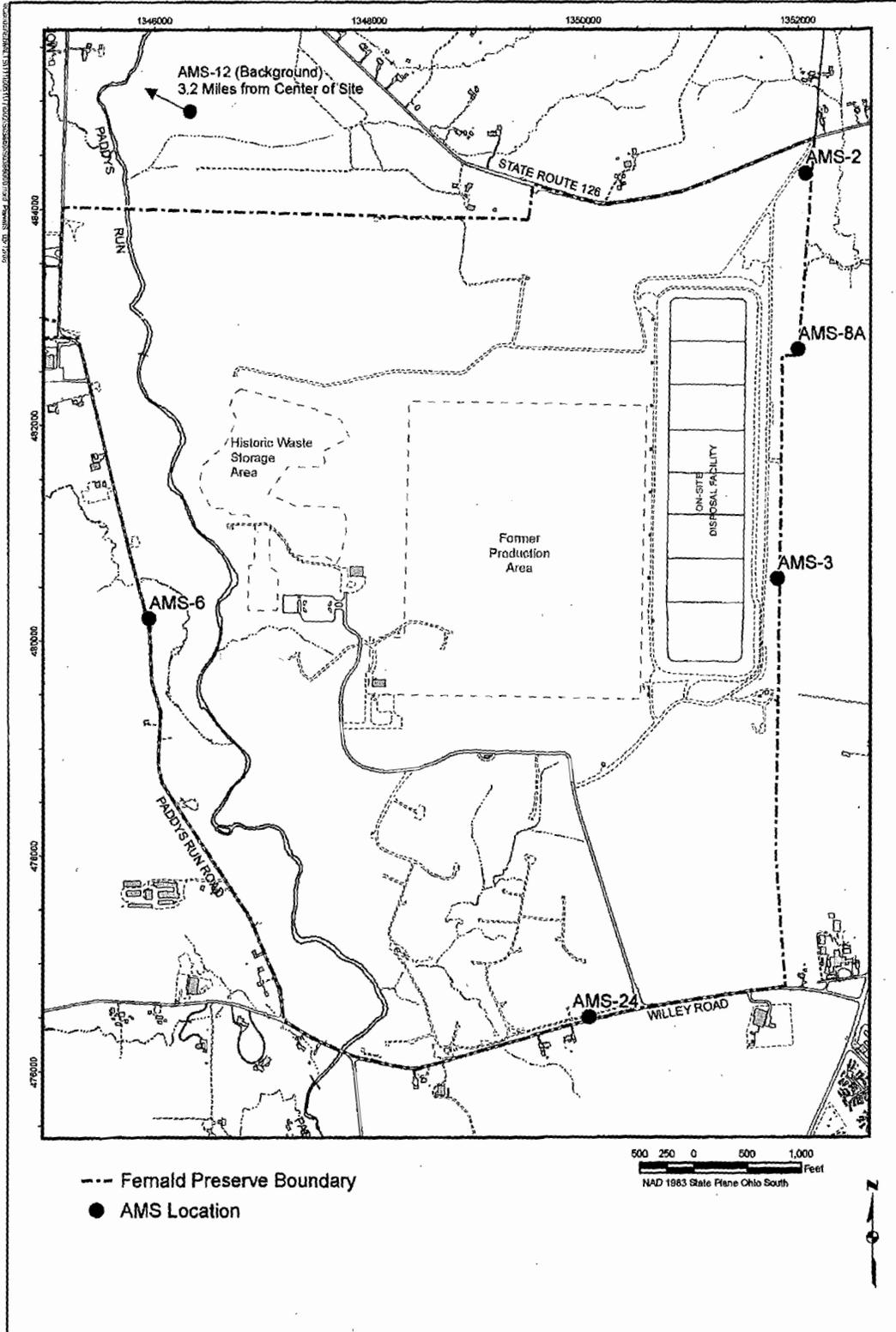


Figure 1. Radiological Air Monitoring Locations

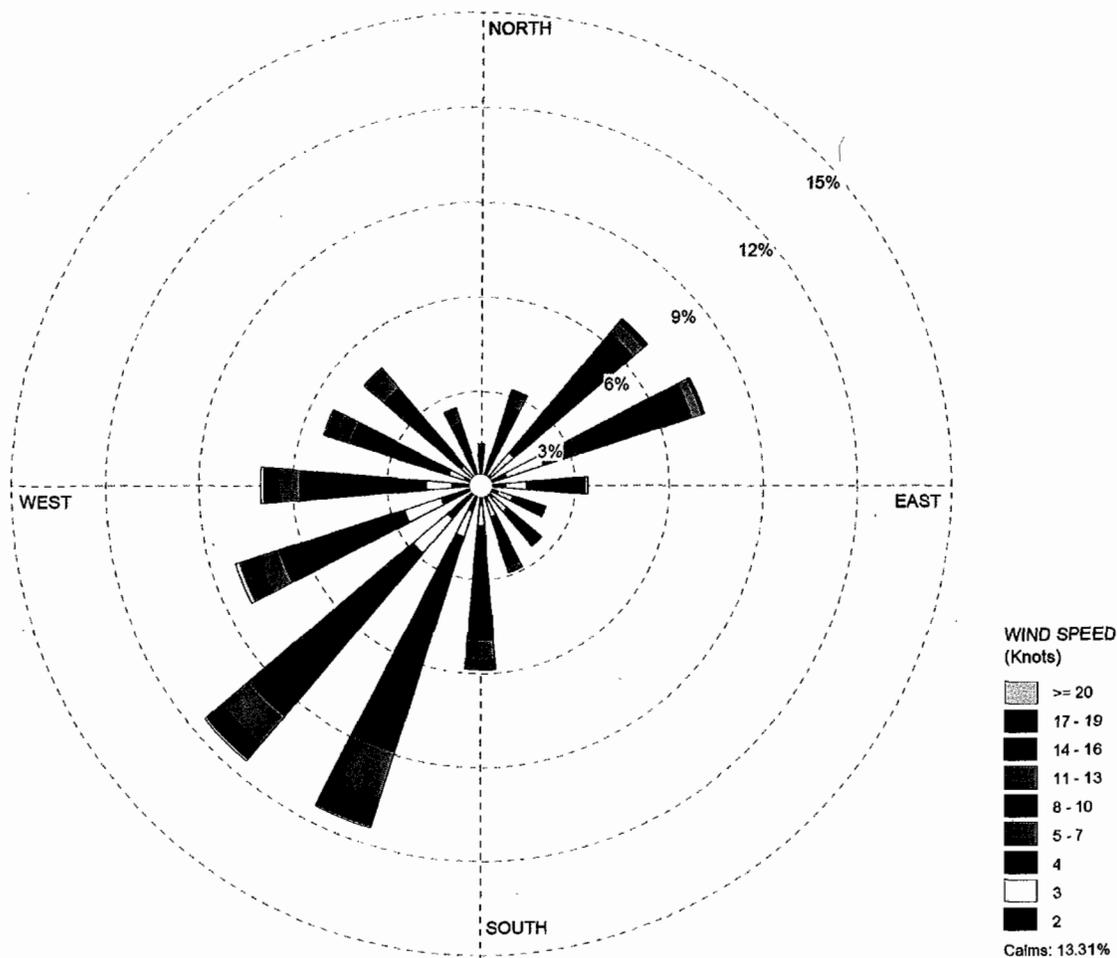


Figure 2. Five Year Average (2002 – 2006) Wind Rose, 33-ft (10-m) Height

1.3.1 Monitoring Equipment and Locations

Six high-volume AMSs (Figure 1) draw air continuously through an 8-inch by 10-inch filter at a rate of 40–50 cubic feet per minute (ft³/min) (1.13–1.42 cubic meters per minute [m³/min]). Each AMS contains a flow-rate chart recorder and a hour-meter that provide a record of the monitor's operational run-time over the sampling period. Additionally, each AMS is equipped with flow controllers that maintain a constant airflow through the monitor automatically adjusting blower/motor speed to correct for variations in line voltage, temperature, pressure, or filter loading. The six AMSs are divided among boundary and background monitoring locations. Five monitors are located on the Fernald Preserve boundary and one monitor collects background data at a location approximately 3.2 miles (5.2 km) from the center of the Fernald Preserve.

The EPA criteria for locating air monitors (40 CFR 58, Appendix E) were considered when selecting the initial 16 boundary locations. Reduction of the initial 16 locations to the present five stations was discussed with and approved by the EPA (DOE 2006b, DOE 2006c).

1.3.2 Analytical Regime and Sampling Frequency

The analytical regime and sampling frequency for this program were designed to collect defensible data, account for the major dose sources and demonstrate compliance with NESHAP Subpart H, as defined in 40 CFR 61.93(b)(5)(ii).

- Filters were exchanged monthly throughout the year and were analyzed for total uranium and total particulates to document emissions originating from wind erosion of soil at the Fernald Preserve.
- A portion of each monthly filter was retained and used to form a quarterly composite sample. The composite samples were analyzed for radium-226, thorium-228, thorium-230, thorium-232, uranium-234, uranium-235 and uranium-238. Results from the quarterly composite samples are used to track compliance with the NESHAP Subpart H standard for the calendar year.
- The isotope list for the quarterly results used for NESHAP compliance is based on:
 - Radionuclides that were stored in large quantities at the Fernald site and were handled or processed during the remediation effort (all noted isotopes)
 - Radionuclides that were the major contributors to dose based on environmental and stack filter measurements (uranium-234, uranium-235 and uranium-238)
 - Radionuclides in waste and contaminated soil that were the major contributors to dose during remedial actions (uranium-234, uranium-235, uranium-238, thorium-228, and thorium-230).

Uranium-238, thorium-232, and uranium-235 are the parent nuclides in the uranium, thorium, and actinide decay chains, respectively. The uranium and thorium isotopes received and processed during the production history of the Fernald site were separated from their decay chain progeny at the site in the early years, and in later years the separation occurred prior to shipment to the site. As a result of the separation and purification of uranium and thorium products, all decay chain progeny are not in equilibrium with the parent activity, but short half-life progeny are expected to be in equilibrium with the parent. Because some of the short-lived progeny are difficult to quantify using standard radiochemistry analytical techniques, in part due to the limited sample volume and low nuclide concentrations in the quarterly composite samples, they can be considered to be present in equilibrium with their parent or immediately preceding long-lived daughter (i.e., thorium-234 with uranium-238; radium-228 and actinium-228 with thorium-232; radium-224 with thorium-228; and thorium-231 with uranium-235). The progeny nuclides noted above are used in the dose assessment.

Net air concentrations for measured isotopes are summarized in Table 1. For the boundary monitors, the net air concentration is defined as the analytical result minus the blank and background values. The net air concentration at the background location is the analytical result minus the blank.

1.3.3 Air Emission Data Reporting

All monitoring data are provided to the EPA and OEPA electronically on the Office of Legacy Management's Fernald Preserve website:

<http://www.lm.doe.gov/land/sites/oh/ferald/feralddata.htm>.

Table 1. CY 2007 Net Air Concentrations

Location	Radium (pCi/m ³)	Thorium (pCi/m ³)			Uranium (pCi/m ³)		
	226	228	230	232	234	235/236	238
Boundary^a							
AMS-2	0	1.80E-07	0	0	5.50E-08	0	2.10E-08
AMS-3	6.50E-07	0	1.60E-07	2.30E-08	2.40E-07	0	6.60E-08
AMS-6	2.70E-06	2.00E-07	0	0	2.60E-09	0	7.00E-08
AMS-8A	0	1.20E-07	0	0	5.60E-07	0	6.00E-07
AMS-24	7.20E-06	0	0	4.00E-08	8.90E-08	5.40E-08	9.10E-08
Background - AMS-12							
2007	8.90E-06	9.60E-07	9.80E-07	5.80E-07	9.00E-07	0	8.80E-07
2006 ^b	5.09E-05	2.99E-06	1.01E-06	1.18E-06	1.89E-06	0	2.13E-06

^aFor boundary monitors, net = total - blank - background (0 if net is negative)

^b2006 results in the Table D-1 of the 2006 SER were the NESHAP compliance ratios, rather than the net ratios. The correct values for 2006 are reported here.

2.0 Air Emissions Data

2.1 Air Monitoring Data Completeness Status

During CY 2007, there were no concerns about data quality of the quarterly composite results. All blank filter results were below nuclide detection limits, and corrections to the analytical results were unnecessary.

2.2 Air Monitoring Station Operational Performance

During CY 2007, operational run-times for the six AMSs exceeded 96 percent (Table 2). In general, interruptions in monitor operations during CY 2007 were the result of short-term power failures and/or equipment failures.

3.0 Dose Assessment

Based on the sum of the quarterly net measured concentrations (i.e., net concentration equals boundary concentration minus background concentration) and annual air volumes, the annual net average concentration for each radionuclide is calculated and then divided by the corresponding value listed in Subpart H of 40 CFR 61, Appendix E, Table 2 to form a radionuclide-specific compliance ratio. For each boundary monitor, the sum of the radionuclide compliance ratios is calculated (Table 3) to evaluate compliance with NESHAP requirements. In accordance with 40 CFR 61.107, compliance with the NESHAP standard is demonstrated when the sum of the ratios is less than 1. The maximum value for the sum of ratios is 0.0023 at AMS-24. AMS-24 operated 96.3 percent of the time during 2007.

Table 2. CY 2007 Operational Summary for Air Particulate Monitoring Stations

Location	Number of Samples	Sample Start Date	Last Sample Collection Date	Operating Time (hours)	Percent of Operation
Boundary					
AMS-2	12	02-Jan-07	02-Jan-08	8661	98.9
AMS-3	12	02-Jan-07	02-Jan-08	8634	98.6
AMS-6	12	02-Jan-07	02-Jan-08	8497	97.0
AMS-8A	12	02-Jan-07	02-Jan-08	8597	98.1
AMS-24	12	02-Jan-07	02-Jan-08	8433	96.3
Background					
AMS-12	12	02-Jan-07	02-Jan-08	8643	98.7

Table 3. 2007 Annual NESHAP Compliance Ratios

Location	Ac-228 ^a	Ra-224 ^a	Ra-226	Ra-228 ^a	Th-228	Th-230	Th-231 ^a	Th-232	Th-234 ^a	U-234	U-235/6	U-238	Annual Total	Annual Dose ^b (mrem/yr)
Boundary^c														
AMS-2	0	1.2E-06	0	0	5.7E-05	0	0	0.0E+00	9.6E-09	7.1E-06	0	2.5E-06	6.7E-05	6.7E-04
AMS-3	6.1E-09	0	2.0E-04	3.8E-06	0	4.7E-05	0	3.6E-05	3.0E-08	3.2E-05	0	8.0E-06	3.2E-04	3.2E-03
AMS-6	0	1.3E-06	0	0	6.3E-05	0	0	0	3.2E-08	0	0	8.4E-06	9.0E-04	9.0E-03
AMS-8A	0	7.8E-07	0	0	3.8E-05	0	0	0	2.7E-07	7.3E-05	0	7.2E-05	1.8E-04	1.8E-03
AMS-24	1.1E-08	0	0	6.7E-06	0	0	1.9E-10	6.4E-05	4.1E-08	1.2E-05	7.3E-06	1.1E-05	2.3E-03	2.3E-02
Background														
AMS-12	1.6E-07	6.4E-06	0	9.8E-05	3.1E-04	2.9E-04	0	9.3E-04	4.0E-07	1.2E-04	0	1.1E-04	4.6E-03	4.6E-02

^aratio determined by assuming air concentration is in secular equilibrium with the parent nuclide.

^bDose is based on the NESHAP standard of 10 mrem/yr multiplied by the annual total for all isotopes.

^cFor boundary monitors, net = total - blank - background (0 if net is negative)

Based on the NESHAP approach for demonstrating compliance, the 40 CFR 61, Appendix E, Table 2 values represent the annual average radionuclide concentrations that correspond to a 10 mrem/yr effective dose equivalent. It follows that a fraction of the 40 CFR 61, Appendix E, Table 2 values would correspond to an equivalent fraction of a 10 mrem/yr effective dose equivalent. Therefore, the sum of ratios for each monitor is converted to a dose by multiplying the sum by 10 mrem/yr (Table 3). The maximum value of the sum of the ratios (0.0023) is observed at AMS-24, and this converts to a maximum effective dose equivalent of 0.023 mrem/yr (0.00023 mSv/yr) at the Fernald Preserve boundary.

Because the nearest downwind resident is located approximately 2,000 feet (606 meters) east-northeast from AMS-24, the dose received by this receptor would be lower than 0.023 mrem/yr (0.00023 mSv/yr) because particulate dose decreases with distance.

4.0 Compliance Assessment

For CY 2007, the maximum effective dose equivalent from emissions of radionuclides to the ambient air, based on samples collected at the Fernald Preserve boundary, is estimated to be 0.023 mrem/yr (0.00023 mSv/yr), which is in compliance with the Subpart H standard of less than 10 mrem/yr (0.1 mSv/yr).

5.0 Additional Information

5.1 Meteorological Data

Refer to Figure 2 for the wind rose data.

5.2 Construction/Modifications at the Fernald Preserve

In CY 2007, there were no project changes that resulted in a need to apply to the EPA for approval (under the provisions of 40 CFR 61.96) to modify the monitoring network for source emissions.

6.0 References

DOE (U.S. Department of Energy), 2006a. Comprehensive Legacy Management and Institutional Controls Plan, 20013 PL 0001, Revision 1, Final, Fluor Fernald, DOE, Fernald Area Office, Cincinnati, Ohio, June.

DOE (U.S. Department of Energy), 2006b. "Approval for removing Phase 1 – TLD, Radon and Particulate Monitors (AMS-04, AMS-05, AMS-07, AMS-23, AMS-25 and AMS-28)," received at weekly conference call on 11 April 2006.

DOE (U.S. Department of Energy), 2006c. "Phase II Site Boundary Air Monitor Reductions," approval letter received from EPA on November 29, 2006.

DOE (U.S. Department of Energy), 1997, "Application for Approval to Use Environmental Measurements to Demonstrate Compliance with the National Emission Standards for Hazardous Air Pollutants Subpart H," letter #DOE-0980-97, Johnny Reising to James Saric and Michael Murphy, May 23.

EPA (U.S. Environmental Protection Agency), 1997, "Application for Approval to Use Environmental Measurements to Demonstrate Compliance with the National Emission Standards for Hazardous Air Pollutants Subpart H," letter from Jack Barnett to Johnny Reising, August 11.

7.0 Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment (see 18 USC 1001).

Name: _____

Signature: _____

Date: _____

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Name: Jane Powell

Signature: Jane Powell

Date: 5-21-08