



Department of Energy

Ohio Field Office
Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



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25 OCT 2001

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

DOE-0063-02

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

Mr. Peter J. Sturdevant
Hamilton County Department of Environmental Services
Air Quality Management Division
250 William Howard Taft Road
Cincinnati, Ohio 45219

Dear Mr. Saric, Mr. Schneider and Mr. Sturdevant:

QUARTERLY REPORT ON DRYER STACK

The purpose of this letter is to transmit the following information to the United States Environmental Protection Agency (USEPA), the Ohio Environmental Protection Agency (OEPA), and the Hamilton County Department of Environmental Services (DOES).

In response to the OEPA comments on the Draft Remedial Action Package, the Department of Energy, Fernald Environmental Management Project (DOE-FEMP), Fluor Fernald, Inc., and IT Corporation (IT) agreed to provide quarterly reports of any deviations or excursions from emissions limitations, operational restrictions, and control device operating parameter limitations for the dryer stack. If no deviations or excursions occurred during the affected calendar quarter, a report stating so is required.

Mr. James A. Saric
Mr. Tom Schneider
Mr. Peter Sturdevant

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The information contained in this letter satisfies the commitment for calendar quarter July 1 through September 30, 2001. Specifically, there are two types of incidences to report for the time period:

1. On September 25, 2001, a power outage occurred at the Waste Pits Remedial Action Project (WPRAP) that momentarily shut down Dryers A & B and the associated off-gas system. The shutdown lasted approximately two minutes until emergency generators were running and supplying power to all the off-gas equipment, including the exhaust fan. However, burners on the Thermal Oxidizer (TO) had to cool down before they could be re-lit safely. The cool down took approximately 17 minutes, during which time the exhaust fan was pulling a draft on the dryers. Since the TO was not operating while the exhaust fan was pulling a draft, the Hamilton County DOES was notified. Hamilton County DOES was informed of the incident with an explanation that emissions were minimal because:
 - A. The off-gas system was operating so only potential emissions would be hydrocarbons.
 - B. The scrubber would aide in removing hydrocarbon emissions.
 - C. TO was only shut down for 17 minutes.
 - D. The dryer was cooling, resulting in lower hydrocarbon emissions.

2. The High-Efficiency Particulate Air (HEPA) filters failed the in-place efficiency test on three separate occasions during the report time period; August 23, September 10, and September 20. It should be noted that at the time of installation, all HEPA filters are Dioctyl Phthalate (DOP) tested to ensure the removal efficiency requirement is met. During routine maintenance for HEPA filter change out, personnel observed that the gaskets on the HEPA filters were not making contact against the sealing surface. Since the gaskets were not properly positioned, the DOP crew tested the filters in place prior to change out. On the dates noted above, the removal efficiencies were 99.90%, 90.0%, and 99.93% respectively. Since the filters did not meet the 99.97% removal efficiency requirement, the Hamilton County DOES was notified. Data gathered from the beta detector on the stack filter for each incident did not indicate releases of radionuclides out of the stack during those time periods. WPRAP is currently conducting an in-depth investigation of the HEPA filtration system to correct the problem and prevent future inefficiencies.

No additional deviations or excursions occurred during the referenced time period.

Mr. James A. Saric
Mr. Tom Schneider
Mr. Peter Sturdevant

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If you have any questions or comments, please contact John Hall at (513) 648-3118.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Hall

cc:

N. Hallein, EM-31/CLOV
R. J. Bell, OH/FEMP
J. Hall, OH/FEMP
D. Lojek, OH/FEMP
A. Tanner, OH/FEMP
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
F. Hodge, Tetra Tech
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
D. Draper, IT Corporation/MS39
T. Arnold, Fluor Fernald, Inc./MS52-1
D. Carr, Fluor Fernald, Inc./MS2
M. Cherry, Fluor Fernald, Inc./MS52-2
D. Dalga, Fluor Fernald, Inc./MS52-1
T. Hagen, Fluor Fernald, Inc./MS65-2
S. Hinnefeld, Fluor Fernald, Inc./MS31
R. Houchins, Fluor Fernald, Inc./MS52-1
M. Jewett, Fluor Fernald, Inc./MS52-2
P. Shanks, Fluor Fernald, Inc./MS65-2
T. Walsh, Fluor Fernald, Inc./MS65-2
D. Zdelar-Bush, Fluor Fernald, Inc./MS52-1
AR Coordinator, Fluor Fernald, Inc./MS78
ECDC, Fluor Fernald, Inc./MS52-7