



State of Ohio Environmental Protection Agency

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October 2, 2002

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

Re: COMMENTS - Radon Control System (RCS) Valve Assembly Installation Overview

Dear Mr. Reising:

Ohio EPA has reviewed DOE's submittal, "Radon Control System (RCS) Valve Assembly Installation Overview" received on September 27, 2002. Our comments follow:

1. Ohio EPA should be included in the notifications section (3.7) prior to breaching the silos headspace. A tentative schedule for valve installation should also be included in this document.
2. The document provides inadequate detail on the pressure control valves. Ohio EPA is concerned that after installation the relief valve may be actuated due to ambient conditions causing an unplanned release from the silos headspace. This issue needs to be addressed before installation.
3. The relief valves will be installed well in advance of RCS operation. Per DCN 40710-JEG-014 these valves are to be monitored for radon emissions. This document does not address monitoring of relief valve emissions.
4. Meteorological parameters such as stability class should be monitored. Meteorological conditions, such as atmospheric inversions, may be unacceptable for valve installation activities. These types of restrictions should be included in this document.

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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