



State of Ohio Environmental Protection Agency

Southeast District Office

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George V. Voinovich  
Governor

April 19, 1994

RE: SHIELDALLOY METALLURGICAL  
GUERNSEY COUNTY  
DERR CORRESPONDENCE

Mr. Chad Glenn, Project Manager  
Regulatory Issues Branch Section  
Office of Nuclear Materials Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chad:

This correspondence regards the March 1994 Draft Summary Report for the Environmental Impact Statement Scoping Process for the Shieldalloy Metallurgical Corporation in Cambridge, Ohio. Ohio EPA received the document on April 6, 1994. Per the cover letter attached to the Summary Report and subsequent discussions with you, Ohio EPA has reviewed and commented on the draft document. The following are Ohio EPA's comments on the draft Summary Report:

1. Page 16, Section 3.3.1, Federal and State Environmental Regulations: The second NRC response provided in this section concerns laws and regulations collectively termed Senate Bill 130 and how S.B. 130 may impact the remediation activities at the SMC site. Please add to your response that the ultimate decision of the applicability of S.B. 130 falls within the jurisdiction of the Ohio Department of Health and the Ohio EPA.
2. Page 30, Section 3.5, Environmental Consequences of Past and Current Operations: The second NRC response on page 30 concerns baghouse dust generated at the SMC site. Please add to your response that, while the generated baghouse dust is not radioactive, it is hazardous because of the elevated concentration of chromium the dust exhibits. For further information concerning this issue, please contact Rich Stewart of Ohio EPA's Division of Hazardous Waste Management at 614-385-8501.
3. Page 56, Appendix A, Item 4: Please define for the readers of this document what is meant by "incremental impact" to workers, the public and the environment. This document should define incremental impact and it should be noted what is considered an unacceptable increment of impact by an alternative.

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Many of the NRC's responses to comments raised during the scoping process are very general in nature, making further comments regarding these responses difficult. As the EIS progresses, it is anticipated that the concerns raised by the State of Ohio will be addressed in a more comprehensive fashion. Many of the issues raised by Ohio EPA can be further discussed during the April 29, 1994 meeting being planned in Cambridge, Ohio with the NRC, ODH, U.S.EPA and Ohio EPA.

If you should have any questions concerning these comments please feel free to call at 614-385-8501

Sincerely,



David Hunt  
Site Coordinator  
Division of Emergency and Remedial Response

DH/mr

cc: Jenifer Kwasniewski, DERR, CO  
Catherine Stroup, Legal, CO  
Jane Harf, Ohio EPA-Deputy Director  
Dwain Baer, ODH-Radiological Unit  
Jim Payne, Attorney General Office