Metropolitan
St. Louis Sewer
District

Office of Environmental Compliance
10 East Grand Avenue
St. Louis, MO 63147-2913
(314) 436-8710
FAX (314) 436-8753

LTSM013173

1 07M

December 21, 2001

Thomas Pauling
U.S. Department of Energy
7295 Highway 94 South
St. Charles, MO 63304

Dear Mr. Pauling:

We have reviewed your application dated October 24, 2001 requesting approval to discharge up to 15,000 gallons of wastewater per month to the Metropolitan St. Louis Sewer District. This wastewater is leachate from the covered storage cell at the Weldon Spring Site Remedial Action Project (WSSRAP) located at 7295 Highway 94 South, St. Charles, Missouri. The storage cell contains waste associated with the remediation activities of former TNT production and uranium processing at the site.

Based on the analytical results, this material meets our criteria for acceptance as a hauled waste and is approved for discharge at the Bissell Point Hauled Waste Receiving Station. The material may be discharged only by a hauler having a valid MSD identification number and presenting an original, completed Hauled Waste Receipt (form HWR-S). The annual allocation for radioactivity from the WSSRAP storage cell discharging at the MSD Bissell Point Hauled Waste Receiving Station is 0.15 milliCuries (0.15 mCi/year). This approval is valid for 5 years from the date of this letter. As a condition of this approval, you must notify us of any changes which would affect the characteristics of this discharge.

You must submit monthly self-monitoring reports, analyzing for the following parameters:

+ filtered

- ✓ Total Uranium
- ✓ Thorium-228
- ✓ Thorium-230
- ✓ Thorium-232
- ✓ Radium-226
- ✓ Radium-228
- Americium-241
- Neptunium-237
- Plutonium-238
- Plutonium-239/240
- Technetium-99
- ✓ Gross alpha
- ✓ Chemical oxygen demand 1L

2-4 L for 6 QC

- ✓ Total suspended solids 1L
- ✓ Volatile organic priority pollutants
- ✓ Arsenic
- ✓ Barium
- ✓ Copper
- ✓ Iron
- ✓ Lead
- ✓ Chromium
- ✓ Mercury
- ✓ Nickel
- ✓ Selenium
- ✓ Silver
- ✓ Zinc

1L

30 Liters

9 Cubic's

1L Filtered

We will require that each batch of wastewater be analyzed for all the radionuclides listed above plus gross alpha. We will only require one batch of wastewater be analyzed per month for the remaining parameters. Self-monitoring reports are due 28 days after the end of each month. The frequency of the self-monitoring may be reduced in the future if the analytical results warrant.

A monthly sum of the ratios must be calculated for all radionuclides listed above, and the result must be less than 1.0 according to the Nuclear Regulatory Commission regulations in 10 CFR 20. These calculations must be included with the self-monitoring reports.

To demonstrate the solubility of the radioactive materials, as required by 10 CFR 20, you will need to provide the results of one filtered versus unfiltered test for total uranium using a 0.45 micrometer (0.45 micron) filter. This information must be included with the self-monitoring reports.

In addition to the monthly self-monitoring reports, the MSD Radioactive Materials Discharge Report (attached) must also be completed and certified. This report lists the total radioactivity discharged during the current calendar quarter to ensure compliance with the 0.15 milliCurie per year limit. These reports are due 28 days after the end of the calendar quarter.

This discharge has been approved based upon the information and sample analysis you provided, and is subject to the conditions stated above. This approval may be revoked by the District at any time if any of the information is found to be incorrect, or if the conditions of this approval are violated. Also, if the discharge causes any operational or maintenance problem within the District's collection or treatment system, or results in violations of any conditions of the District's NPDES permit, MK-Ferguson Corporation and the property owner, U.S. Department of Energy, will be considered responsible for damages.

If you have any questions, please call me at (314)436-8742.

Sincerely,
METROPOLITAN ST. LOUIS SEWER DISTRICT

Roland A. Biehl
Environmental Associate Engineer

bv

pc Bernie Rains
Doug Mendoza
Fabian Grabski
Ed Cope
Darin Lewis
Paul Taylor
Thomas M. Siegel, P.E. Chief, Permits and Engineering – MO DNR

File: SD, Weldon Springs Site Remedial Action Plan

METROPOLITAN ST. LOUIS SEWER DISTRICT
INDUSTRIAL USER RADIOACTIVE MATERIALS DISCHARGE REPORT

PART I: IDENTIFYING INFORMATION

Company Name: _____

Permit No: _____

Premise Address: _____

Reporting Period: Θ(JAN-MAR) Θ(APR-JUNE) Θ(JULY-SEPT) Θ(OCT-DEC)

PART II: RECORD OF DISPOSAL OF RADIOACTIVE MATERIALS TO THE SEWER SYSTEM

RADIONUCLIDE	ACTIVITY DISCHARGED (millicuries)
TOTAL ACTIVITY DISCHARGED:	

PART III: CERTIFICATION STATEMENTS

Place your initials in the box under item A.
Everyone must complete the information under items A & B and sign this report.

A. CERTIFICATION OF COMPLIANCE WITH STATE AND FEDERAL REGULATIONS

☐ I certify that to the best of my knowledge & belief, all requirements of 10 CFR Part 20.2003 and 19 CSR Part 20-10.090 governing disposal by release into sanitary sewage for material regulated by the Nuclear Regulatory Commission and the Missouri Department of Health, respectively, have been met for the period covered by this report.

B. RADIOACTIVE MATERIALS DISCHARGE REPORT CERTIFICATION

I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print/type name of signing official: _____

Title: _____ Telephone: _____

Signature: _____ Date: _____