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**OHIO ENVIRONMENTAL PROTECTION AGENCY  
(OHIO EPA)/FERNALD ENVIRONMENTAL  
MANAGEMENT PROJECT (FEMP) WASTEWATER  
MEETING MINUTES, APRIL 8, 1992, DAYTON,  
OHIO**

**05/08/92**

**DOE-1538-92  
DOE-FN/EPA  
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LETTER**



**Department of Energy**  
Fernald Environmental Management Project  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705  
(513) 738-6357

MAY 08 1992

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DOE-1538-92

Mr. James A. Saric, Remedial Project Director  
U. S. Environmental Protection Agency  
Region V - 5HRE-8J  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3590

Mr. Graham E. Mitchell, Project Manager  
Ohio Environmental Protection Agency  
40 South Main Street  
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

**OHIO ENVIRONMENTAL PROTECTION AGENCY (OHIO EPA)/FERNALD ENVIRONMENTAL  
MANAGEMENT PROJECT (FEMP) WASTEWATER MEETING MINUTES, APRIL 8, 1992, DAYTON,  
OHIO**

Enclosed is a copy of the agenda and minutes of the April 8, 1992, meeting that was held in the Southwest District Office of the Ohio EPA, Dayton, Ohio, to address wastewater issues. Representatives from the Ohio EPA, the Department of Energy (DOE), and Westinghouse Environmental Management Company of Ohio (WEMCO) were in attendance. This meeting provided the opportunity to openly discuss several wastewater issues (see agenda) concerning the FEMP. This meeting resolved a number of issues and also identified a number of actions that must be taken to achieve and/or maintain environmental compliance. We are actively working those actions.

If you or your staff have any questions regarding the meeting summary, please contact Ed Skintik at (513) 738-6660.

Sincerely,

R. E. Tiller  
Manager

FN:Skintik

Enclosure: As Stated

cc w/enc.:

K. A. Hayes, EM-424, TREV  
S. A. Frush, EM-424, TREV  
M. Burt, OEPA-SWDO  
T. Schneider, OEPA-SWDO  
M. Walbridge, OEPA-SWDO  
S. M. Beckman, WEMCO  
D. J. Brettschneider, WEMCO  
L. S. Farmer, WEMCO  
M. J. Galper, WEMCO  
F. L. Johnston, WEMCO  
R. W. Kneip, WEMCO  
E. D. Savage, WEMCO  
P. B. Spotts, WEMCO  
AR Coordinator, WEMCO

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From: F. L. Johnston  
Date: April 21, 1992  
Subject: WASTEWATER MEETING WITH OEPA

WEMCO:EC&QA:92-107

To: E. D. Savage

A meeting was held at OEPA Southwest District Office; Dayton, Ohio on April 8, 1992, at 9:00 am to discuss wastewater issues. An attendance list and meeting agenda are attached.

The first topic of discussion was the Wastewater Permit to Install (WPTI) for the Advanced Wastewater Treatment Facility (AWWT). Specific concerns raised by WEMCO included definition of the chemical data required for the WPTI application. We explained to OEPA that the AWWT is designed only for removal of radionuclides; specifically uranium. Radionuclides are not regulated under the NPDES permit program. We further explained that the AWWT is a polishing facility that accepts already treated wastewater to provide additional radionuclide removal. Although conventional pollutants such as metals may be removed by the AWWT, removal of these pollutants is not the purpose for which the system is designed. The question of required chemical data needed resolution to ensure the application process is as smooth as possible. OEPA responded by indicating that only data for pollutants included in the design basis need be provided. They did not request any additional chemical data.

We discussed the possibility of design/construction changes and how they should be handled with respect to the PTI process. OEPA indicated that changes would be addressed by a letter of notification with the necessary supporting documentation. OEPA was afforded the opportunity to look at the 50% design package to determine which plan sheets should be submitted in the PTI application.

The second item on the agenda concerned potential NPDES permit modifications. Several issues needing to be addressed in the NPDES permit include: incorporating interim discharges associated with the South Plume Pump and Discharge operation and the Interim Advanced Wastewater Treatment (IAWWT) system (two units); incorporating the AWWT when it becomes operational; and removing limitations and monitoring requirements for lead, cyanide, and silver at Manhole 175 based on two years of data showing these pollutants are well below Ohio water quality standards.

In addition, there are modifications that OEPA is requiring. OEPA had previously indicated that Sewage Treatment Plant sludge handling must be included in the NPDES permit. They gave DOE/WEMCO the choice of requesting the incorporation of a sludge management plan into the permit. If DOE/WEMCO chooses not to request this modification, OEPA will initiate the action and place the FEMP on a schedule of compliance to develop a sludge management plan. We informed OEPA that we would make the request in order to avoid the

schedule of compliance. OEPA indicated that the sludge management plan is only required to consist of a brief description of the amount and characteristics of the sludge generated, along with a description of removal and disposal practices. OEPA was afforded the opportunity to look at the draft paper describing the sludge handling practices at the STP (attached). OEPA was generally pleased but did request additional operational information for the anaerobic digester and chemical data on the sludge at the point of ultimate disposal (after drying and prior to drumming).

The final permit modification issue involves the pH excursion allowance. OEPA indicated that they would act on a FEMP request to eliminate the pH limitations at the FEMP internal outfalls. The FEMP would still be required to maintain continuous monitoring capability. However, with the limitations removed, the FEMP would not be subject to excursion reports or noncompliances for excessive pH excursions at these internal outfalls. Because pH is an Ohio water quality standard, the limitations at Manhole 175 and the Stormwater Retention Basin overflow cannot be deleted.

There was much discussion over the logistics of incorporating these modifications. We came to an agreement to submit two modification requests. The first modification will: 1) request the deletion of lead, cyanide, and silver; 2) request the deletion of the pH limitations at the internal outfalls; and 3) provide a sludge management plan for incorporation. This first modification can be prepared rather quickly; the limiting factor being the sludge management plan.

The second modification will incorporate the South Plume, Part Two, Pump and Discharge and related items (aeration tank, etc.) and the future AWWT implementation (including shutdown of the SLS discharge to the GMR). This second modification should be in place by January 1993; meaning the request should be prepared and submitted by October 1992. No modification would be made to reflect the operation of the IAWWT units as no wastewater will be routed from existing internal monitoring points.

The third item on the agenda concerned a discussion of NPDES stormwater application issues. We informed OEPA that we were in the process of preparing an individual permit application and discussed some of the problems we were having gathering data. OEPA confirmed our intention of documenting the rain events and sample collection procedures completely given the fact that the amount of rainfall required to obtain a sufficient flow to sample in some cases was more than the "acceptable event" definition in the regulation.

We also inquired about the General Permit status in the State of Ohio. OEPA informed us that, while Ohio has made application to get General Permit authority, they have not received that authority. Therefore, the General Permit is not an option to the FEMP.

We then discussed stormwater application requirements for construction activity. We iterated our position that construction activity, the runoff from which was contained in the process area stormwater system, would not require stormwater applications because the process area stormwater is already discharged through currently permitted NPDES outfalls (Stormsewer Lift Station - \*4604 and the Stormwater Retention Basin - \*4606). OEPA agreed with our position. However, runoff from projects that leave the process area would require an application if the cumulative disturbed area was greater than five acres. OEPA informed us that these applications would need to be submitted beginning October 1, 1992.

The fourth topic of discussion concerned the FEMP Best Management Practices (BMP) plan and program. We informed OEPA that the FEMP was in the process of closing the existing plan and associated action items and beginning to prepare a new plan. We raised two main issues: 1) how should we demonstrate closure of the existing action items; and 2) in order to avoid redundant information contained in the Spill Control and Countermeasures Plan and the BMP Plan, the FEMP was considering combining the two plans. OEPA responded to the first issue by requesting a letter informing OEPA of the closure of all action items. The FEMP then would maintain the files on these items for inspection during a future compliance inspection. With regards to the second issue, OEPA was supportive of the idea to combine plans with similar information or reference other plans (i.e. RCRA Contingency Plan, etc.) which contained the information, to avoid duplication. OEPA suggested that such a plan could contain appendices listing what information is required under each regulatory requirement. They also informed us that this combined plan would be subject to OEPA review and approval.

The final topic of discussion was the response to OEPA comments on the South Groundwater Contamination Plume Removal Action - Part 2 - Groundwater Pump and Discharge Operation. DOE/WEMCO wanted the opportunity to go over the responses to these comments prior to officially transmitting said responses. We also inquired about the status of the PTI for Part 1 of this removal action; the Alternate Water Supply project and the status of the OEPA review on the Work Plan for Removal Action No. 16. OEPA informed us that the review on the RA 16 Work Plan was complete and comments had been sent. The PTI for the Alternate Water Supply Project was still under review. Mr. Brettschneider informed OEPA that the FEMP would proceed on the Alternate Water Supply Project with or without PTI approval. OEPA acknowledged this position.

Meeting adjourned at 1:10 pm.

  
F. L. Johnston, Sr. Engineer  
Sitewide Regulatory Integration

Attachment

Ellery D. Savage

-4-

WEMCO:EC&amp;QA:92-107

c: S. M. Beckman  
D. J. Brettschneider  
C. J. Fermaintt, FN  
V. A. Franklin  
M. J. Galper  
J. P. Hopper  
R. W. Kneip  
L. Pennington  
W. Quaider, FN  
S. G. Schneider  
~~E. P. Skintik, FN~~  
P. B. Spotts  
T. J. Walsh  
Central Files

DOE/WEMCO/OEPA WASTEWATER MEETING  
APRIL 8, 1992  
LIST OF ATTENDEES

S. M. Beckman, WEMCO  
D. J. Brettschneider, WEMCO  
Martyn Burt, OEPA-SWDO  
M. J. Galper, WEMCO  
F. L. Johnston, WEMCO  
R. W. Kneip, WEMCO  
Graham Mitchell, OEPA-SWDO  
Tom Schneider, OEPA-SWDO  
E. D. Skintik, FN  
P. B. Spotts, WEMCO  
Matt Walbridge, OEPA-SWDO

AGENDA FOR WASTEWATER MEETING  
OEPA/DOE/WEMCO  
APRIL 8, 1992

- I. Advanced Waste Water Treatment (AWWT) Facility - Permit to Install
  - A. PTI permitting process
    - 1. Basis
    - 2. Schedule
    - 3. Availability of AMK model
  - B. Plan sheet requirements
- II. NPDES modifications
  - A. State initiated modifications
    - 1. pH excursion allowance
    - 2. STP sludge
  - B. Interim discharge modifications
    - 1. IAWWT's
    - 2. Groundwater discharge
  - C. Pollutant deletion @ MH-175 unrelated to interim discharges.
    - 1. Lead
    - 2. Cyanide
    - 3. Silver
  - D. Incorporating AWWT
- III. Stormwater permit
  - A. General permit vs. individual permit
  - B. Status/issues with current individual application
- IV. BMP
  - A. Closing out existing items/plan
  - B. Preparing new plan
- V. Removal Action No. 3 - South Groundwater Contamination Plume Removal Action
  - A. Status on Plan Approval for Part 1 - Alternate Water Supply
  - B. OEPA comments on plan sheets for Part 2 - Groundwater Pump and Discharge System