

WATER COVER ON WASTE PIT 5

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

Dear Mr. Mitchell:

WATER COVER ON WASTE PIT 5

The purpose of this letter is to document recent discussions between you and my staff on the activities associated with placing a water cover on Waste Pit 5.

On July 30, 1991, a work plan for the Waste Pit 5 Liner Repair project, which was to be conducted as an ongoing maintenance activity, was submitted to the Ohio Environmental Protection Agency (Ohio EPA) for review. The work plan was revised to incorporate Ohio EPA's comments. The work plan specified that the water cover normally maintained to mitigate fugitive air emissions would be removed to allow inspection and repair of the liner. The work plan also specified that the water cover would be replaced following completion of the required activities.

Standard procedure has been to maintain the water cover using a trickle flow of potable water from a small 1.5 inch supply line. However, following the Liner Repair Project, replacing the water cover in this manner would not have been possible due to the slow rate of water supply through the 1.5 inch line, the large volume of water required, and the evaporation rate of the water due to the large surface area of the pit. In order to replace the water cover as soon as possible and thereby mitigate any fugitive emissions, alternate sources of acceptable water were evaluated.

The most suitable source of water was determined to be treated wastewater from the non-contaminated side of the General Sump. This non-radiological wastestream, which is collected from the water treatment plant and boiler plant blowdown, had been treated and determined to be acceptable for discharge to the great Miami River through National Pollutant Discharge Elimination System (NPDES) outfall 4602. Between April 10 and May 8, 1992, a total of 920,000 gallons of treated wastewater from the non-contaminated side of the General Sump was pumped to Waste Pit 5.

Paragraph 4 of the Consent Decree signed December 2, 1988, requires written approval from the Ohio EPA before any "sewage, industrial waste or other waste as those terms are defined by Ohio Revised Code Section 6111.01" is placed into Pit 5. Although the treated wastewater which was pumped to Waste Pit 5 had been treated to remove pollutants and was acceptable for discharge to the Great Miami River, it appears that in addition to approval of the work plan, further approval was required under paragraph 4.1 of the Consent Decree. The discharge to Waste Pit 5 was immediately halted upon discovering that it was subject to Paragraph 4.1 of the Consent Decree.

It is the Fernald Environmental Management Project (FEMP) position that use of treated wastewater, which has been shown to be acceptable for discharge through NPDES Outfall 4602, represents the best alternative for replacing and maintaining the water cover on Waste Pit 5. Replacing the water cover on Pit 5 with this stream, which is acceptable for discharge directly to the Great Miami River, is far preferable from a waste minimization standpoint to adding potable water to Waste Pit 5, because this would thereby create additional wastewater. Your approval is requested to resume rerouting the flow from Outfall 4602 to Waste Pit 5 as required to maintain an adequate water cover.

If you or your staff have any questions, please contact Ed Skintik at FTS/Commercial (513) 738-6660.

Sincerely,



R. E. Tiller
Manager

FN:Skintik

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