



Restoration Management Corporation

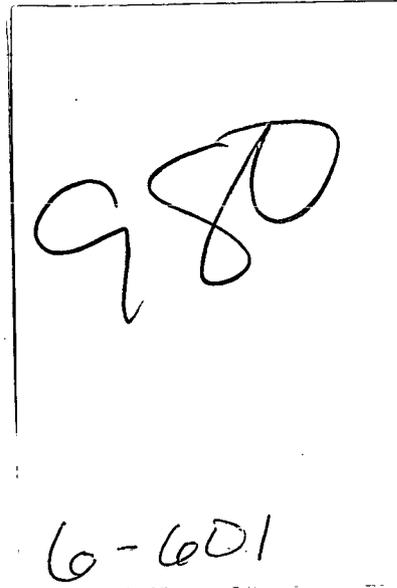
P. O. Box 538704 Cincinnati, Ohio 45253-8704 (513) 648-3000

September 8, 1997

Fernald Environmental Management Project
Letter No. C:SWP(ARP):97-0028

Ms. Brenda Rennie
Fiscal Unit, Division of Surface Water
Ohio Environmental Protection Agency
1800 WaterMark Drive
Columbus, OH 43215-1099

Dear Ms. Rennie:



OHIO ENVIRONMENTAL PROTECTION AGENCY 1997 ANNUAL DISCHARGE FEE

A letter stating an estimate of average daily flow for the U.S. Department of Energy Fernald Environmental Management Project (FEMP), NPDES Permit #G-11000004-98, was recently sent from your office. In the letter, the average daily flow for the FEMP from May 1, 1996 to October 31, 1996 was listed as 9.517622 MGD. We feel that this average daily flow estimate and the corresponding preliminary fee shown in your letter is incorrect.

The flows reported for Outfall 4001 are average daily flows. However, flows shown at the remaining outfalls do not reflect average daily flows. The figures provided on form 4500 for Outfall 4002 are those measured during overflows of the Stormwater Retention Basin and are stormwater related. The SWRB only overflowed three (3) times to date during the term of the current permit. The flows at Outfalls 4003, 4004, 4005, and 4006 are all stormwater related and are only required to be measured once during the months of June and December per the approved permit. These monitoring points are for large, pervious, uncontrolled drainage basins with discharges only during storm events of sufficient magnitude to cause flow in the channels. Though these figures are shown on the MOR forms as average flows, they do not accurately represent the average daily flows at these outfalls. Therefore, in assessing the Annual Discharge Fee, these figures should not be added to the average daily flow found at Outfall 4001. A more accurate representation of the average daily flow at the FEMP is 2.376390 MGD. The data and method used to calculate this flow is provided on Page 3 of this letter.

To support this explanation, attached are the May - October, 1996 MORs per your request. If you have any questions, please contact Marlene M. Landrum (513) 648-4197.

Sincerely,



David J. Brettschneider, Project Manager
AWWT & Wastewater Project

MML
Enclosures

c: S.M. Beckman, Fluor Daniel Fernald, MS 52-3
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L.C. Goidell, Fluor Daniel Fernald, MS 65-2
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J.D. Kappa, DOE-FEMP, MS 45
M.M. Landrum, Fluor Daniel Fernald, MS 52-5
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AR Coordinator, MS 78
EDC File No. 52700

CALCULATION OF AVERAGE DAILY FLOWS

OUTFALL 4001		
Month	Flow (MG)	Number of Days
May	106.529	31
June	63.494	30
July	71.767	31
August	56.366	31
September	66.786	30
October	72.300	31
Totals	437.242	184

REMAINING OUTFALLS			
Date	Outfall	Flow (MGD)	Number of Days
May 15	4002	2.133	1
June 3	4004	0.081	1
	4005	0.490	
June 4	4003	3.277	1
	4006	1.162	
Totals		7.143	3

437.242	184 Days
<u>+ 7.143</u>	<u>+ 3 Days</u>
444.385	187 Days

$$444.385 + 187 = 2.376390$$

∴ Average Daily Flow = 2.376390 MGD