



**Department of Energy**

**Ohio Field Office  
Fernald Area Office**

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**1945**

JAN 29 1999

Mr. Martyn Burt, Supervisor  
Ohio Environmental Protection Agency  
Southwest District Office  
Division of Surface Water  
401 East Fifth Street  
Dayton, OH 45402-2911

DOE-0370-99

Dear Mr. Burt:

**RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY'S REQUEST FOR INFORMATION - DECEMBER 15, 1998, NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM COMPLIANCE INSPECTION - FERNALD ENVIRONMENTAL MANAGEMENT PROJECT - NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT NO. 11000004\*ED**

Your letter dated December 24, 1998, identified three issues for which the Ohio Environmental Protection Agency (OEPA) was awaiting a response. You requested information regarding: 1) an operation and maintenance manual for the wastewater treatment plant; 2) the calibration date of the flow meter at Outfall 4001; and 3) an evaluation of sampling frequencies relative to whether regulated parameters are being sampled more frequently than the permit requires.

Fluor Daniel Fernald, Inc. (FDF), Department of Energy's (DOE) operating contractor at Fernald Environmental Management Project (FEMP), operates all FEMP treatment systems through standard operating procedures. These procedures are supplemented with equipment manufacturers information, standing orders, and shift orders. All equipment is identified, tagged, and logged in the site's preventative maintenance system "Computerized Maintenance Management System" (CMMS). This ensures that all treatment system components receive the appropriate preventative maintenance at the appropriate intervals. While there is not a single Operation and Maintenance Manual, FDF operates and maintains all treatment systems in a disciplined, procedure-driven manner consistent with the DOE's Conduct of Operations philosophy defined by DOE Order 5480.19 "Conduct of Operations" and the associated FDF Conduct of Operations Program (RM-0029).

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The flow meter in question is the Parshall Flume which measures the FEMP combined effluent discharge to the Great Miami River at NPDES Outfall 4001. The Parshall Flume is calibrated quarterly by FDF instrument mechanics. The date of the last calibration was December 22, 1998.

The issue regarding the sampling frequency was raised given the extensive environmental monitoring program implemented through the FEMP's Integrated Environmental Monitoring Program (IEMP). The IEMP specifies a surface water monitoring program beyond the monitoring delineated in the NPDES Permit. FDF and DOE have evaluated the sampling schedule, sampling locations, and sampling frequencies in the IEMP and have determined that NPDES regulated parameters at NPDES regulated locations are not being monitored more frequently than the permit requires. FDF and DOE recognize that if regulated parameters are monitored more frequently than the permit requires that these additional results must be included and reported in the Monthly Operating Report. Parameters not regulated by the current permit, but sampled under the IEMP program at regulated outfalls are reported quarterly to both the OEPA and U.S. Environmental Protection Agency (U.S. EPA). Records of the results of these additional parameters are maintained consistent with the record keeping requirements specified in the NPDES permit.

If you have any further questions regarding these issues or the information provided, please contact Mr. John Kappa at (513) 648-3149.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:Kappa

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cc:

N. Hallein, EM-42/CLOV  
G. Jablonowski, USEPA-V, SRF-5J  
J. Saric, USEPA-V, SRF-5J  
R. Beaumier, TPSS/DERR, OEPA-Columbus  
T. Schneider, OEPA-Dayton  
F. Bell, ATSDR  
M. Schupe, HSI GeoTrans  
R. Vandegrift, ODH  
F. Barker, Tetra Tech  
D. Brettschneider, FDF/52-5  
D. Carr, FDF/52-2  
T. Hagen, FDF/65-2  
J. Harmon, FDF/90  
R. Heck, FDF/2  
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bcc:

R. J. Janke, OH/FEMP

A. Tanner, OH/FEMP

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