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FLUOR GLOBAL SERVICES

April 17, 2000

Fernald Environmental Management Project
Letter No. C: SWP(ARWWP):2000-0009

Mr. Thomas A. Winston, District Chief
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Winston:

**NONCOMPLIANCE REPORT - MARCH 2000 - NPDES PERMIT NUMBER 1100000*FD -
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)**

Enclosed is the Noncompliance Report for March 2000. If you have any questions, please contact Mr. Frank Johnston at (513) 648-5294.

Sincerely,



David J. Brettschneider
Project Manager

DJB:FLJ

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File Record Subject
Project Number52700

NONCOMPLIANCE REPORT
 NPDES PERMIT NO. 11000004*FD
 FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
 U.S. DEPARTMENT OF ENERGY

The following table describes the March 2000 noncompliances with the discharge limitations specified in the FEMP NPDES Permit. This table lists the affected outfall, dates of the noncompliance, parameter, permit limits, and measured effluent concentrations.

PARSHALL FLUME - OUTFALL *4001			
DATE	PARAMETER	PERMIT LIMIT	ACTUAL MEASUREMENT
March 17, 2000	Oil & Grease Mass Loading	105 kg/day	177.4 kg/day
March 22, 2000	Oil & Grease Mass Loading	105 kg/day	120.8 kg/day

SEWAGE TREATMENT PLANT EFFLUENT - OUTFALL *4601			
DATE	PARAMETER	PERMIT LIMIT	ACTUAL MEASUREMENT
March 20, 2000	TSS Concentration	40 mg/l	42.0 mg/l
March 2000	TSS Monthly Average	20 mg/l	28.3 mg/l

The Oil & Grease (O&G) exceedances were for daily mass loading. However, the concentrations measured on both of these days were within effluent limitations (8.7 mg/l and 5.6 mg/l respectively) and the flow rates for these days (5.404 MGD and 5.717 MGD respectively) were below the permitting basis of 6.173 MGD. The FEMP articulated concerns with establishing a loading unrelated to the permitting basis flow rate during the NPDES permit renewal comment period.

There is no definitive cause for the slightly elevated O&G concentrations experienced on these days. The FEMP effluents that combined at the parshall flume on these days include:

- Treated groundwater from the Advanced Wastewater Treatment (AWWT) expansion facility
- Treated groundwater from the South Plume Interim Treatment System and Interim AWWT facility
- Treated storm water from AWWT Phase 1
- Treated Surge Lagoon Water from AWWT Phase 2
- Treated sewage treatment plant effluent

There were no untreated effluents discharged on these days except for extracted groundwater, which would not be a source of O&G. A review of Assistant Emergency Duty Officer (AEDO) logs revealed no spills of any kind on the days in question (AEDO logs are used to notify and respond to any abnormal events on site).

As no definitive cause has been identified, no specific course of action is contemplated. The FEMP will continue to monitor this situation.

The TSS noncompliances at the sewage treatment plant are likely related to one (or a combination) of the following factors.

- Significant precipitation occurred on March 20, 2000. The FEMP has had problems with excessive infiltration in the past.
- Change in the weekly flow pattern due to the new site work schedules. This has resulted in a reduction of flow of about 20% from February.
- Fluctuating water temperatures (seasonal problem)
- Over-oxidation of the mixed liquor

Fluor Fernald/FEMP will continue to monitor this issue. With the warmer temperatures expected and the continuing acclimation to the new site flow patterns, the TSS exceedances will likely be temporary. Fluor Fernald operations staff will continue to monitor mixed liquor characteristics and aeration patterns and adjust as appropriate.