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FLUOR GLOBAL SERVICES

June 19, 2001

Fernald Environmental Management Project
Letter No. C: ARP(ARWWP):2001-0010

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 - MAY 2001 - NPDES PERMIT NUMBER 11000004*FD -
FERNAL ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)**

Enclosed is the May 2001 Noncompliance Report. If you have any questions, please contact Mr. Frank Johnston at (513) 648-5294.

Sincerely,



David J. Brettschneider
Project Manager

DJB:FLJ
Enclosure

1

Mr. Thomas A. Winston, District Chief
Letter No. C: ARP(ARWWP):2001-0010
Page 2

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File Record Subject NPDES Permit
Project Number52700

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

The following table describes the May 2001 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.

SEWAGE TREATMENT PLANT EFFLUENT - OUTFALL *4601			
DATE	PARAMETER	PERMIT LIMIT	ACTUAL MEASUREMENT
May 21, 2001	TSS Concentration	40 mg/l	77.0 mg/l
May 21, 2001	TSS Mass Loading	24.2 kg/d	25.36 kg/d
May 28, 2001	TSS Concentration	40 mg/l	60.0 mg/l
May 2001	TSS 30-Day Average Concentration	12.1 mg/l	29.11 mg/l

The noncompliances at the sewage treatment plant are believed to be caused by several contributing factors:

- 1) Excessive inflow/infiltration during an extended wet period from May 17 through May 27. Increased flow rates as well as increased influent uranium concentrations at the sewage treatment plant during wet periods seem to validate the conclusion of excessive inflow/infiltration. This inflow/infiltration hampers the ability to effectively control suspended solids.
- 2) Operating with only the west clarifier in service as a result of corrective maintenance activities on the east clarifier. Additionally, the energy isolation plan for this maintenance work temporarily required that the skimmer from the west clarifier be taken out of service exacerbating the ability to control solids. The east clarifier was taken out of service on May 5 so that the flight system could be rebuilt (including flights, chains, axles, and bearings). All the parts with the exception of one of the required six bearings were in stock. We estimate the east clarifier will be returned to service by June 30, 2001.
- 3) The energy isolation plan for the clarifier work also required the recycle line from the effluent tank to be closed and locked until a valve could be installed on the skimmer line for the east clarifier. This delayed the scheduled cleaning of the effluent tank. Operations personnel observed what appeared to be denitrification occurring in the effluent tank resulting in solids rising to the tank surface. In addition, a mal-adjusted sampling line was collecting sample aliquots too close to the surface resulting in perhaps the composite sample being non-representative of the actual discharge. The effluent tank was cleaned on June 1, 2001 and the sample line adjusted to ensure samples collected are representative of that being discharged.