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WATER COVER ON PIT 5

06/15/95

DOE-1080-95
DOE-FN OEPA
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LETTER

Department of Energy
Fernald Environmental Management Project
P. O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 648-3155

JUN 1 5 1995

DOE-1080-95

Mr. Tom Schneider
Ohio Environmental Protection Agency
Office of Federal Facilities Oversight
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Schneider:

WATER COVER ON PIT 5

This letter requests the Ohio Environmental Protection Agency's (OEPA) written approval to drain water from the Fernald Environmental Management Project's (FEMP) Pit 5, initiate liner repairs, and use treated wastewater to re-establish the Pit 5 Water Cover after completing the liner repairs. The Liner Repair Project is similar to past work performed at the FEMP in 1992, and is considered an ongoing maintenance activity. The use of treated wastewater as a water cover for Pit 5 was previously approved by OEPA in 1992 (see Enclosures 1 and 2).

After receiving OEPA approval, the FEMP intends to begin draining Pit 5 water to the Clearwell, for eventual treatment in the site's wastewater treatment system. The repairs to the liner will be conducted using the same methods as in 1992. Similarly, the water cover on Pit 5 will be re-established using treated wastewater from the non-contaminated side of the General Sump. The repairs to the liner are estimated to take about three weeks to complete.

If you have any questions or require additional information, please contact Ed Skintik at (513) 648-3151.

Sincerely,

Glenn Griffith
for Jack R. Craig
Director

FN:Skintik

Enclosures: As Stated

Recycled and Recyclable

cc w/enc:

P. Pardi, OEPA
J. Saric, USEPA
T. D. Hagen, FERMCO
D. Paine, FERMCO
AR Coordinator, FERMCO

Enclosure 1

97

Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

REGULATORY
COMPLIANCE SECTION
FERNALD, OHIO

MAY 18 1 07 PM '92

MAY 1 5 1992
DOE-1691-92

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 EPAs 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.

3

Recycled and Recyclable

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

R. E. Tiller
Manager

FN:Skintik

cc:

R. P. Whitfield, EM-40, FORS
J. J. Fiore, EM-42, TREV II
K. A. Hayes, EM-424, TREV II
J. Van Kley, Ohio AGO
J. P. Hopper, WEMCO
E. D. Savage, WEMCO
AR Coordinator, WEMCO

Enclosure 1 (cont'd)

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

Sincerely,

R. E. Tiller

R. E. Tiller
Manager

FN:Skintik

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J. P. Hopper, WEMCO
E. D. Savage, WEMCO
AR Coordinator, WEMCO

Enclosure 2

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402-2086
(513) 285-6357
FAX (513) 285-6404

REGULATORY COMPLIANCE SECTION
MAY 22 2 40 PM '92

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To JACK CRAIG	From G. MITCHELL
Co. DOE	Co. OEPA
Dept.	Phone #
Fax # 1-738-6650	Fax #

cc S. Bee
D.J.
from Victor Fra
Copies
Ellery Savage
Tom Walsh
SC Files - OU1
NPDES
Phil Spotts
L. Pennington

May 20, 1992 Re: WATER COVER ON WASTE PIT 5

Mr. R.E. Tiller
Site Manager
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, Ohio 45239

Dear Mr. Tiller:

Ohio EPA has received your letter of May 15, 1992, detailing activities associated with Waste Pit 5. We have reviewed the events leading to the recovering of Pit 5 with non-radiological wastewater and agree with the technical decisions which DOE made to reduce fugitive air emissions. I discussed this with Mr. Jack Van Kley of the Ohio Attorney General's Office and he also concurs with your technical decision. In the future, for issues, relating to compliance with the 1988 Consent Decree, we request that you obtain written approval as required prior to taking action. If an emergency situation should occur, verbal approval followed by a written record of events would also be acceptable.

Ohio EPA also agrees that the use of non-radiological wastewater from Outfall No. 602 is acceptable to maintain an adequate water cover on Pit 5. Please keep records of the flow diverted from Outfall No. 602. This information may be useful when considering various NPDES permit modifications in the future.

If you have any questions please contact me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/acn

cc: Martyn Burt, OEPA, DWPC
Tom Schneider, OEPA, DERR
Jim Saric, U.S. EPA
Jack Van Kley, Ohio Attorney General's Office

6

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