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FLUOR

June 19, 2002

Fernald Environmental Management Project
Letter No. C:ARWWP:2002-0013

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 2002 - NPDES PERMIT NUMBER 1IO00004*FD FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)

Enclosed is the May 2002 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

c: Joe Bartoszek, OEPA-SWDO
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File Record Subject NPDES Permit
Project Number 52700

NONCOMPLIANCE REPORT
NPDES PERMIT NO. 1I000004*FD
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
U.S. DEPARTMENT OF ENERGY

The following table describes the May 2002 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
May 6, 2002	Oil & Grease Mass Loading	105 kg/day	142.2 kg/day

The Oil & Grease (O&G) exceedance was for daily mass loading. However, the concentration measured on this day (5.9 mg/l) was below the effluent concentration limit of 10 mg/l.

There is no definitive cause for the slightly elevated O&G concentration experienced on this day. The FEMP effluents that combined at the parshall flume on May 6, 2002 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 wastewater from AWWT Phase 2
- Treated sewage treatment plant effluent
- Untreated groundwater discharged in accordance with the FEMP groundwater remediation outlined in the FEMP "Operations and Maintenance Master Plan" (United States Department of Energy, Fernald Environmental Management Project, December 1999).

There were no untreated effluents discharged on these days except for extracted groundwater, which would not be a source of O&G. The unit operations within the FEMP treatment systems are effective in removing any trace oil & grease contamination that may be present.

A review of Assistant Emergency Duty Officer (AEDO) logs revealed three spills of petroleum or related products on May 6, 2002. (AEDO logs are used to notify and respond to any abnormal events on site including and abnormal releases.)

- Less than eight ounces of hydraulic fluid was released from a filter housing on a track hoe at the high nitrate tank demolition project. The spill was contained and the FEMP Waste Acceptance Organization (WAO) directed waste disposition. This location would not have impacted Outfall 4001
- An estimate of less than one gallon of hydraulic fluid was released from broken hose from a front end loader No. 84 at the Waste Pit Remedial Action Project (WPRAP)

Material Handling Building during dryer feed operations. Oil was soaked up with sand and dry product and placed in bin for loadout. A spill in this location could potentially impact Outfall 4001 but it would have to proceed through the WPRAP Wastewater Treatment System, The FEMP Biosurge Lagoon, and then AWWT Phase 2. Al indications are the spill was contained at the source and did not enter the WPRAP wastewater treatment system.

- The WPRAP reported a loss of five gallons of hydraulic fluid from front-end loader No. 70460 inside the Material Handling Building. Oil was soaked up with sand and dry product and placed in the disposal bin for loadout. As above, all indications are that the spill was contained at the source and did not enter the WPRAP wastewater treatment system.

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