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FLUOR

February 19, 2003

Fernald Environmental Management Project
Letter No. C:ARWWP:2003-0002

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 – JANUARY 2003 - NPDES PERMIT NUMBER 11000004*FD
FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP)**

Enclosed is the January 2003 Noncompliance Report. If you have any questions, please contact Mr. Frank Johnston at (513) 648-5294.

Sincerely,



David J. Brettschneider, Project Manager
Aquifer Restoration/Wastewater Project

DJB:FLJ
Enclosure

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File Record Subject NPDES Permit
Project Number 52700

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

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The following table describes the January 2003 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
January 26, 2003	Oil & Grease Mass Loading	105 kg/day	237.37 kg/day

The Oil & Grease (O&G) exceedance was for daily mass loading. However, the concentration measured on this day (9.8 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 January 26, 2003 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 groundwater from AWWT Phase 1
- Treated groundwater 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. Groundwater is not a source of O&G contamination. Except for the sewage treatment plant, all treatment systems were treating groundwater which means that collected storm water in the storm water retention basin and collected storm water and wastewater in the biosurge lagoon were not being processed. If O&G was present in source water it would be that collected in these two facilities.

A review of Assistant Emergency Duty Officer (AEDO) logs revealed no spills of petroleum or related products on January 26, 2003. (AEDO logs are used to notify and respond to any abnormal events on site including and abnormal releases.)

Another potential source of O&G could be the wastewater treatment systems and well pumping systems themselves. Contamination could occur during maintenance activities or certain types of equipment failure. Investigation revealed that an in-line sewage treatment plant effluent pump did in-fact fail on January 27, 2003. However, the degree to which this contributed to the elevated oil and grease concentration has not been determined.

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