

Fluor Fernald, Inc.
P.O. Box 538704
Cincinnati, OH 45253-8704

4874

(513)648-3000

FLUOR

May 16, 2003

Fernald Closure Project
Letter No. C:ARWWP:2003-0013

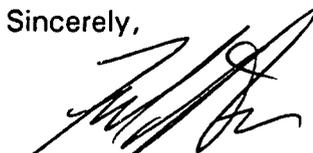
Mr. Thomas A. Winston, District Chief
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402-2911

Dear Mr. Winston:

**NONCOMPLIANCE REPORT – APRIL 2003 - NPDES PERMIT NUMBER 11000004*FD
FERNALD CLOSURE PROJECT (FCP)**

Enclosed is the April 2003 Noncompliance Report. If you have any questions, please contact me at (513) 648-5294.

Sincerely,



Frank Johnston, Environmental Compliance
Aquifer Restoration/Wastewater Project

FLJ
Enclosure

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c: Joe Bartoszek, OEPA-SWDO
N. Hallein, EM-42/CLOV
Ev Henry, Fluor Fernald, MS52-5
Bill Hertel, Fluor Fernald, MS52-5
Rob Janke, DOE-FEMP, MS45
Donna Metzler, Fluor Fernald, MS52-5
Tim Poff, Fluor Fernald, MS65-2
Ed Skintik, DOE-FEMP, MS45
Tom Schneider, OEPA-SWDO
ECDC, Fluor Fernald, MS52-7
AR Coordinator, MS78

File Record Subject NPDES Permit
Project Number 52700

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The following table describes the April 2003 noncompliances with the discharge limits specified in the Fernald Closure Project (FCP) NPDES Permit. This table lists the affected outfall, dates of the noncompliance, parameter, permit limits, and measured effluent concentrations.

DATE	LOCATION	PARAMETER	EFFLUENT LIMIT	ACTUAL MEASUREMENT
April 23, 2003	001	Oil & Grease (Daily Max.)	10 mg/L	12.8 mg/L
April 23, 2003	001	Oil & Grease (Daily Max.)	105 kg/D	276.1 kg/D

There is no definitive cause for the elevated oil and grease (O&G) concentration experienced on April 23. The FCP effluents that combined at the Parshall Flume (001) on this day include:

- Treated groundwater from the Advanced Wastewater Treatment (AWWT) expansion facility
- Treated groundwater from the South Plume Interim Treatment System
- Treated storm water from the Interim AWWT facility
- Treated groundwater from AWWT Phase 1
- An approximate 50:50 blend of treated groundwater and treated wastewater from the bio-surge lagoon from AWWT Phase 2
- Treated sewage treatment plant effluent
- Untreated groundwater discharged in accordance with the FCP groundwater remediation outlined in the "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. An analysis of potential routes of entry of oil contamination into either groundwater pumping discharge piping or the effluent line down stream of FCP treatment systems has determined that oil could potentially be introduced via a pump motor failure. However, this has been determined to be improbable, and in any event, no such motor failure occurred on or about the date and time of sample collection.

A review of Assistant Emergency Duty Officer (AEDO) logs revealed no spills of petroleum or related products on April 23, 2003. (AEDO logs are used to notify and respond to any abnormal events on site including and abnormal releases.)

As reported in the March 2003 Noncompliance Report, an investigation into sources of O&G and treatment capabilities has been initiated and has determined that emulsified oils in sufficient quantities may not be effectively removed by AWWT unit operations. There is now an attempt to identify any sources of emulsified oils. Oil present as a sheen has not been observed in the head-works to the treatment systems (Storm Water Retention Basin

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for AWWT Phase 1 and the bio-surge lagoon for Phase 2) nor has a sheen been observed in the clarifiers located at the front of both Phases 1 and 2.

Routine process control monitoring for uranium did identify a significant increase in uranium concentration in the Storm Water Retention Basin beginning on April 23, 2003. Fluor Fernald has determined the likely source of this increased uranium was from excavation dewatering activities within the former production area. There are places within the former production area (e.g. former Plant 6 excavation area) where emulsified oil contamination is being investigated. Samples of the Plant 6 excavation have been collected for oil & grease analysis but results have yet to be received.

While Fluor Fernald is investigating these oil and grease measurements as real, we are taking steps to ensure sample contamination and laboratory error are not the cause of the high measurements we have experienced in January, March and April 2003.