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FLUOR

July 17, 2003

Fernald Closure Project
Letter No. C:ARWWP:2003-0018

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 – JUNE 2003 - NPDES PERMIT NUMBER 11000004*FD
FERNALD CLOSURE PROJECT (FCP)**

Enclosed is the June 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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File Record Subject NPDES Permit
Project Number 52700

**NONCOMPLIANCE REPORT
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The following table describes the June 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
June 24, 2003	001	Oil & Grease (Daily Max.)	105 kg/D	164.2 kg/D
June 15, 2003	002	Total Suspended Solids	50 mg/L	112 mg/L
June 11, 2003	601	Fecal Coliform (Daily Max.)	2000 #/100 mL	31,875 #/100 mL
June 2003	601	Total Suspended Solids (Monthly Avg.)	20 mg/L	20.65 mg/L

There is no definitive cause for the elevated oil and grease (O&G) concentration experienced on June 24. 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 storm water and groundwater from AWWT Phase 1
- 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 (OM&MP)" (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 June 24. (AEDO logs are used to notify and respond to any abnormal events on site including and abnormal releases.)

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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, April, and June 2003.

The noncompliance at location 002 was recorded during an overflow condition at the Storm Water Retention Basin (SWRB). The rainfall was experienced at an intensity that prevented sufficient settling of solids from occurring. Due to the amount of rainfall, AWWT operations personnel had initiated a storm water bypass in accordance with the OM&MP in an attempt to prevent an overflow from occurring. The storm water bypass was initiated at 9:15 p.m. local time on June 14. However, given the amount and intensity of the rainfall these measures could not prevent the overflow of the SWRB. A total of approximately 3.42 inches of rainfall was experienced on June 15. The overflow began at 3:00 p.m. on June 15 and lasted approximately 6.5 hours ending at 9:30 p.m. AWWT operations personnel will continue to manage the SWRB in accordance with OM&MP and attempt to the extent possible of preventing the overflow of the SWRB.

The fecal coliform noncompliance at the sewage treatment plant effluent (Outfall 601) was due to a transient problem with the ultraviolet (UV) light intensity indicators. This led to an unrecognized blinding of the UV tubes and the resultant noncompliant fecal coliform result. The tubes were immediately inspected and cleaned once the high fecal coliform result was reported and disinfection returned to acceptable levels. As the sewage treatment plant flow was less than one-percent of the flow measured at Outfall 001 on June 11, no adverse impact on effluent quality to the Great Miami River is expected.

No definitive cause of the monthly average noncompliance for total suspended solids (TSS) at Outfall 601 has been determined. All TSS results during the month of June were below the daily maximum effluent limit of 40 mg/L. The highest TSS measurement occurred on June 26 with a result of 32.4 mg/L.

Fluor Fernald has been operating the east clarifier at the sewage treatment plant as a surge tank to mitigate against the known infiltration/inflow during rain events. The east clarifier was taken off-line for routine cleaning on June 23. While no rainfall was experienced on June 26, the FCP did receive 0.35 inches of rainfall on June 25 that potentially could have adversely impacted the effluent quality with only the west clarifier in service. Fluor Fernald will continue to monitor this situation but there are no specific actions contemplated at this time.