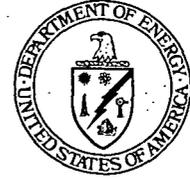




Department of Energy
Ohio Field Office
Fernald Environmental Management Project
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



5050

SEP 17 2003

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0515-03

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE AGREEMENT/
FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY STUDY/
CONSENT DECREE MONTHLY REPORT FOR THE PERIOD OF AUGUST 1, 2003 THROUGH
AUGUST 31, 2003, INCLUDING ANTICIPATED WORK FOR THE PERIOD OF
SEPTEMBER 1, 2003 THROUGH SEPTEMBER 30, 2003**

This letter transmits the Consolidated Consent Agreement/Federal Facility Compliance Agreement/Federal Facility Agreement/Remedial Investigation/Feasibility Study/Consent Decree Monthly Report for the period of August 1, 2003 through August 31, 2003, including anticipated work for the period of September 1, 2003 through September 30, 2003. This report is formatted to reflect the proposal presented in the letter, DOE-0395-96, J. Reising to J. A. Saric and T. Schneider, "Phase VII Removal Actions and Reporting Requirements under the FEMP Legal Agreements," dated January 16, 1996, and agreed to by the United States Environmental Protection Agency (USEPA) and Ohio Environmental Protection Agency (OEPA).

If you have any questions, please contact me at (513) 648-3139.

Sincerely,

Glenn Griffiths
Acting Director

FCP:Reising

Enclosure: As Stated

SEP 17 2053

Mr. James A. Saric
Mr. Tom Schneider

-2-

DOE-0515-03

cc w/enclosure:

N. Hallein, EM-31, CLOV
G. Jablonowski, USEPA-V, SR-6J
V. Dastillung, FRESH
P. Dunn, FRESH
D. Sarno, FCAB
M. Cullerton, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
K. Johnson, OH/FCP
F. Bell, ATSDR
M. Shupe, HIS GeoTrans
D. Carr, Fluor Fernald, Inc./1
T. Hagen, Fluor Fernald, Inc./1
T. Poff, Fluor Fernald, Inc./65-2
ECDC, Fluor Fernald, Inc./52-7

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
AGREEMENT/FEDERAL FACILITY AGREEMENT/REMEDIAL INVESTIGATION/FEASIBILITY
STUDY/CONSENT DECREE MONTHLY REPORT FOR THE PERIOD OF AUGUST 1, 2003
THROUGH AUGUST 31, 2003, INCLUDING ANTICIPATED WORK FOR THE PERIOD OF
SEPTEMBER 1, 2003 THROUGH SEPTEMBER 30, 2003**

This report describes actions at the Fernald Closure Project (FCP) from August 1, 2003 through August 31, 2003, including anticipated work for the period of September 1, 2003 through September 30, 2003. The report has been revised to reflect the proposal presented in the letter, DOE-0395-96, J. Reising to J. A. Saric and T. Schneider, "Phase VII Removal Actions and Reporting Requirements under the FEMP Legal Agreements," dated January 16, 1996, and agreed to by USEPA and OEPA.

OPERABLE UNIT 1 - WASTE PITS REMEDIAL ACTION PROJECT

August 2003

- Enforceable Milestones Completed
 - None
- Work Initiated/Continued/Completed
 - Loaded 23,677 tons of material from waste pits
 - Shipped 246 railcars, 26,471 tons (UT91, UT92, UT93 and UT94) of material for disposal at Envirocare

September 2003 (Anticipated)

- Enforceable Milestones To Be Completed
 - None
- Work To Be Initiated/Continued/Completed
 - Load 15,494 tons of material from waste pits
 - Ship 180 railcars of material for disposal at Envirocare

OPERABLE UNIT 2 - ON-SITE DISPOSAL FACILITY AND SOIL CHARACTERIZATION AND EXCAVATION PROJECT (Additional OU2 soils-related activities may be reported under OU5/Soils Characterization and Excavation Project)

August 2003

- Enforceable Milestones Completed
 - On-Site Disposal Facility (OSDF)
 - None
 - Soils Characterization and Excavation Project (SCEP)
 - Submitted Area 3A/4A Certification Design Letter (CDL)
- Work Initiated/Continued/Completed
 - On-Site Disposal Facility (OSDF)
 - Continued Title III and CQC services for OSDF Construction
 - Completed Cell # 6 Liner secondary GCL/GML installation
 - Started and completed Cell # 6 Liner secondary Geotextile installation
 - Started and completed Cell # 6 Liner secondary drainage layer

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY COMPLIANCE
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- Started Cell # 6 Liner primary GCL/GML installation
- Completed Cell # 2 cap cover drainage layer
- Started and completed Cell # 2 cap biointrusion barrier and choke stone
- Started and completed Cell # 2 cap granular fill
- Started Cell # 2 cap vegetative soil layer
- Continued transite placement in Cell # 5
- Continued impacted material placement in Cell # 3, # 4, and # 5
- Continued clay screening operation in Borrow Area

- Soils Characterization and Excavation Project (SCEP)
 - Continued Concrete Breaking in Area 4A
 - Continued excavation in Area 3A and 4A and AWAC excavation in Area 4A
 - Continued concrete crushing operations for Area 3A stockpile
 - Continued Area 3B concrete breaking (Plant 1 Pad)
 - Started Area 3B excavation, Cat 1 and Cat 2
 - Started organic treatment of soil in Quonset Hut # 1
 - Submitted Sitewide Predesign/Excavation Control PSP
 - Continued Stream Corridors Predesign PSP development
 - Continued Silo Area Predesign PSP development
 - Submitted Area 1 Phase IV excavation plan
 - Submitted Area 2 Phase II IRDP Rev. B
 - Continued Area 6 Phase I Certification sampling
 - Completed OU1 Predesign characterization

September 2003 (Anticipated)

- Enforceable Milestones To Be Completed
 - On-Site Disposal Facility (OSDF)
 - None

- Soils Characterization and Excavation Project (SCEP)
 - None

- Work To Be Initiated/Continued/Completed
 - On-Site Disposal Facility (OSDF)
 - Continue Title III services and CQC Services for OSDF Construction
 - Continue transite placement in Cell # 5
 - Continue impacted material placement in Cell # 3, # 4, and # 5
 - Complete Cell # 2 cap vegetative soil layer
 - Start and complete Cell # 2 cap topsoil layer
 - Complete Cell # 6 liner primary GCL/GML installation
 - Start and complete Cell # 6 liner primary Geotextile installation
 - Start Cell # 6 liner primary drainage layer
 - Continue clay screening operation in Borrow Area

 - Soils Characterization and Excavation Project (SCEP)
 - Continue concrete breaking in Area 4A
 - Continue excavation in Area 3A and Area 4A and AWAC excavation in Area 4A
 - Continue concrete crushing operations for Area 3A stockpile
 - Complete Area 3B concrete breaking (Plant 1 Pad)

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- Continue Area 3B excavation, Cat 1 and Cat 2, and start AWAC excavation
- Complete organic treatment of soil in Quonset Hut # 1
- Submit Area 2 Phase II CDL/PSP
- Submit Area 3A/4A Phase I CDL/PSP
- Complete Area 6 Phase I certification sampling
- Submit Implementation Plan for Area 6, OU1 stockpile area
- Start Area 8 Phase III North Certification sampling
- Submit Final Area 9 Phase II CDL/PSP.
- Submit Stream Corridors Predesign PSP
- Continue Silo Area Predesign PSP development

OPERABLE UNIT 3 - FACILITIES CLOSURE AND DEMOLITION PROJECT

August 2003

- Enforceable Milestones Completed
 - None
- Work Initiated/Continued/Completed
 - Plants 2,3,8,GS (Task 1)
 - 2A -General - process piping inspections
 - Digestion/Denitration - exterior transite removal
 - Extraction - Clean release, lockdown and survey; exterior roof asbestos removal; RUPP tent piping and equipment dismantlement
 - 2H - Began clean-up
 - 3A - Debris and material removal; Removal of interior transite; encapsulation of exterior transite
 - 3E - Clean release; interior cleanup and interior transite removal; piping removals; encapsulation for release survey
 - 3J - Material processing
 - 8A - Interior transite removal; exterior tanks and piping removal; exterior transite removal; release clean; thorium and beryllium equipment/systems dismantlement
 - General Sump - Material processing
 - Lab (Task 6)
 - Building 15A - Building maintenance and maintain seal
 - Pilot Plant (Task 3)
 - Building 13D - Pilot Plant thorium tank farm demolition completed 8/15
 - Building 54A south - Shearing, sizing and loading equipment from Plants 2, 3, and 8
 - Utility Redistribution/Facilities Shutdown
 - Continued redistributions required for the Liquid Storage Complex
 - Continued Administration Complex redistribution
 - Continued isolations of excavation areas 3B and 4B
 - Plant 1 Pad utility isolations ongoing

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- Plant 1 Pad
 - Building 1B - completed loadout of debris 8/13
 - 30A - Floor tile and mastic removal ongoing; exterior transite removal ongoing
 - Building 71 - Demolition completed 8/13; loadout completed 8/21
- Liquid Storage
 - Building 26B (West Water Tower) - Imploded 8/23; loadout completed 8/25
 - Building 30/45 - Transite and conduit removal completed; demolition completed 8/21; loadout completed 8/26
 - Building 80 - Lockdown on west (uranium) side completed; demolition completed 8/25; loadout completed 8/28
- Plant 2 Pipe Bridge
 - Continued abatement along 1st Street and pipe removal along 1st Street and "B" Street (double wrapping and loadout); continued non-asbestos pipe removal and structural steel removal on 1st Street; completed demolition of pipe rack run to Building 30A

September 2003 (Anticipated)

- Enforceable Milestones To Be Completed
 - None
- Work To Be Initiated/Continued/Completed
 - Plants 2,3,8,GS (Task 1)
 - 2A - Digestion/Denitration - Structural demolition
 - Extraction - Exterior transite removal; Complete release clean, lockdown and survey; exterior roof asbestos removal; RUPP tent piping and equipment dismantlement
 - 2B - Begin D&D preparation
 - 2C - Begin D&D preparation
 - 2H - Continue cleanup and start demolition work
 - 3A - Removing interior transite and encapsulation of exterior transite
 - 3E - Encapsulation for release survey
 - 3J - Material processing
 - 8A - Complete clean release, equipment/systems dismantlement and interior transite removal; complete exterior tanks and piping removal; continue exterior transite removal
 - General Sump - Material processing
 - Plant 1 Pad
 - Building 30A/30D - Complete exterior transite removal; begin and complete structural demolition; complete loadout
 - Lab (Task 6)
 - Building 15A - Building maintenance and maintain seal
 - Pilot Plant (Task 3)
 - Building 13D - Equipment/system removal

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- Building 54A south - Shear, size and load equipment/piping from Plants 2, 3, and 8.
- Utility Redistribution/Facilities Shutdown
 - Continue redistributions required for the Liquid Storage Complex
 - Continue Administration Complex redistribution
 - Complete isolations of excavation area 3B, continue isolation of 4B

OPERABLE UNIT 4 - SILOS PROJECT

August 2003

- Enforceable Milestones Completed
 - Submitted Remedial Action Work Plan for Silos 1 and 2 Waste Retrieval Operations to the USEPA/OEPA for review on 7/17/03 (8/1/03 milestone)
- Work Initiated/Continued/Completed
 - Received approval of the draft Explanation of Significant Differences (ESD) for Silos 1 and 2. Issued the draft Final ESD for 30-day public comment period beginning 8/27/03; published notices of availability in local newspapers and sent notification to key stakeholders. Scheduled public hearing for 9/9/03
 - Received approval of the draft Record of Decision (ROD) Amendment for Silo 3 from the USEPA and OEPA. Prepared final ROD and initiated the final DOE approval and signature process in preparation for submittal to USEPA for signature.
 - Responded to OEPA and USEPA comments on the Silos 1 and 2 Dome Penetration and Riser Installation Plan, and received approval of the revised plan; developed detailed procedures documentation in preparation for actual dome penetration and riser installation.
 - Received OEPA approval of the Remedial Action (RA) Work Plan for Silos 1 and 2 waste retrieval operations. Prepared revised Plan to address to USEPA comments.
 - Continued preparation of draft revised Silo 3 Remedial Design Package.
 - Continued Phase 1 operation of the Radon Control System.
 - Continued construction of the Silos 1 and 2 waste retrieval system piping and equipment.
 - Continued construction of the Silos 1 and 2 and Silo 3 Remediation facilities.

September 2003 (Anticipated)

- Enforceable Milestones To Be Completed
 - None
- Work To Be Initiated/Continued/Completed
 - Hold public hearing and complete public review of the draft final ESD for Silos 1 and 2. Prepare final ESD for DOE and USEPA approval.
 - Receive final DOE and USEPA approval of the ROD Amendment for Silo 3
 - Submit revised RA Work Plan for Silos 1 and 2 Waste Retrieval Operations to USEPA/OEPA.
 - Submit Silos 1 and 2 Heel and Decant Sump Tank Removal plan to USEPA/OEPA for review.

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- Issue draft revised Silo 3 Remedial Design Package for internal review in preparation for submittal to USEPA/OEPA.
- Complete Silos 1 and 2 dome penetration and riser installation.
- Continue Phase 1 operation of the Radon Control System.
- Continue construction of the Silos 1 and 2 waste retrieval system piping and equipment.
- Continue construction of the Silos 1 and 2 and Silo 3 Remediation facilities.

OPERABLE UNIT 5 - AQUIFER RESTORATION AND WASTEWATER PROJECT

August 2003

- **Enforceable Milestones Completed**
 - Submitted monthly NPDES Discharge Monitoring Report for June to the OEPA on August 19.
- **Work Initiated/Continued/Completed**
 - Completed construction activities for the South Field Extraction System Phase II
 - Continued treatment plant ion exchange resin regeneration/replacement in order to maintain regulatory discharge limits.
 - Maintained compliance with the 30 ppb monthly average uranium limit for discharges to the Great Miami River. The monthly average uranium concentration for August was 26.7 ppb.
 - Continued implementing measures to mitigate the effects of high TDS wastewater on the AWWT Phase II treatment system.
 - August was the first full month with the South Field Phase II Aquifer restoration Module operating. The 4 extraction wells, 2 injection wells and the injection basin all came online in late July.
 - Maintained groundwater extraction rate at the desired rate in most of the extraction wells. Groundwater pumping rates exceeded 6200 gallons per minute combined from all the groundwater restoration modules.
 - Continued re-injection at rates up to 1425 gallons per minute during most of the month.
 - Continued direct push sampling in the South Field area and in the off-property portion of the South Plume.

September 2003 (Anticipated)

- **Enforceable Milestones To Be Completed**
 - Submit monthly NPDES Discharge Monitoring Report to the OEPA
- **Work To Be Initiated/Continued/Completed**
 - Continue to perform maintenance/rehabilitation on injection and extraction wells.
 - Continue to operate groundwater extraction system at flow rates necessary to maintain regulatory discharge limits.
 - Continue treatment plan ion exchange resin regeneration/replacement in order to maintain regulatory discharge limits.

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WASTE MANAGEMENT

August 2003

- Enforceable Milestones Completed
 - Inorganic Treatment Project - (Site Treatment Plan milestone for completing shipment of 265 total containers by 9/30/03) As of 8/31, packaged 264 containers (note: 1 of the 265 was a duplicate number in the inventory) for shipment and either shipped offsite for treatment or consumed a total of 165 containers.

- Work Initiated/Continued/Completed
 - Incinerator Liquids
 - Completed the Batch 13 shipping paperwork and TSCAI shipping coordination for the three Batch 13 shipments to TSCAI. Batch 13, Shipment 1 (35,119 pounds) was transferred into the TSCAI DOE tanker trailer on 8/20 and shipped to TSCAI on 8/22. Batch 13, Shipment 2 (30,519 pounds) was transferred into the TSCAI DOE tanker trailer on 8/26 and shipped to TSCAI on 8/28. The Batch 13, Shipment 3 TSCAI DOE tanker trailer will be picked up at TSCAI on 9/5 for delivery to the site.
 - Confirmed the maximum extent of Batch 14 inventory prior to inventory submittal for evaluation/release for Batch 14 bulking activities.

 - Hazardous Waste Project
 - Completed the July 1 shipment of 110 excess clean and contaminated compressed gas cylinders to the Integrated Environmental Services, Inc. treatment facility at Oak Ridge, Tennessee.

 - Sample Disposition
 - Completed opening and unpacking all the containers from the original base line inventory; inventoried the remaining drums/containers in Building 68 that were not part of the original inventory. A total of 31 containers were added to the project. A punch list has been created to have the project completed by September 30, 2003.

 - Waste Minimization/Pollution Prevention
 - Completed shipment of 3 roll-off dumpsters of clean, used tires to Rumpke on 8/5

 - Organic Treatment Project (OTP)
 - Received notification Envirocare had completed treatment of Vacuum Thermal Desorption (VTD) System Operability Test (SOT) wastes on 8/8/03. Completed processing and packaging of 28 OTP containers for shipment. Continued identification of inventories for later VTD shipments.

 - Inorganic Treatment Project
 - Finalized remaining STP inventory for off-site shipments in August and September to meet the ITP 9/30/03 STP milestone.
 - Shipped 2 ITP STP containers of mercury waste to M&EC on 8/28.
 - Completed processing and packaging of 75 containers of inorganic, low concentration organic waste streams in the Organic Treatment Project (OTP) that are destined for shipment to WCS.

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- Completed packaging of 179 containers to date. All ITP 9/30/03 STP inventory has been packaged.

September 2003 (Anticipated)

- Enforceable Milestones To Be Completed
 - Inorganic Treatment Project - (Site Treatment Plan Milestone - 9-30-03 - 265 total containers) - Complete shipment of the remaining containers.
 - Incinerator Liquids - (Site Treatment Plan Milestone - TSCA Batch 13 - 9-30-03 - 3 shipments) - Complete shipment of Batch 13 now scheduled for 9/10.
- Work To Be Initiated/Continued/Completed
 - Incinerator Liquids
 - Continue Batch 13 shipments on 9/5 with Shipment 3 TSCA DOE tanker trailer pickup at TSCA. Batch 13 Shipment 3 expected to be shipped to TSCA on 9/10. Continue planning for Batch 14 inventory and bulking operations activities.
 - Sample Disposition
 - Complete the project for turnover of the facility to D&D activities on 10/1
 - Waste Minimization/Pollution Prevention
 - Packaging of a lab pack shipment to Heritage Environmental Services scheduled for 9/9.
 - Organic Treatment Project
 - Await submission of VTD Interim and Final SOT Reports from Envirocare.
 - Inorganic Treatment Project
 - Complete 3 September off-site shipments the weeks of 9/22 and 9/29 to meet the ITP 9/30/03 STP milestone. Complete processing and packaging of containers of inorganic, low concentration organic waste streams in the OTP that are destined for shipment to WCS.

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GLOSSARY

| | |
|--------|---|
| AWAC | Above-Waste-Acceptance-Criteria |
| AWWT | Advanced Waste Water Treatment System |
| CDL | Certification Design Letter |
| CQC | Construction Quality Control |
| ESD | Explanation of Significant Differences |
| FRL | Final Remediation Level |
| GCL | Geosynthetic Clay Liner |
| GML | Geomembrane Liner |
| IRDP | Integrated Remedial Design Package |
| OSDF | On-Site Disposal Facility |
| PSP | Project Specific Plan |
| RFD | Request for Disposal |
| ROD | Record of Decision |
| SCEP | Soils Characterization and Excavation Project |
| SCP&RD | Shipping Classification & Packaging Compliance Requirements Documents |
| STP | Site Treatment Plan |
| TSCAI | TSCA Incinerator |
| UT | Unit Train |
| VTD | Vapor Thermal Desorption |
| WAC | Waste Acceptance Criteria |
| WWDR | Waste Water Discharge Request |
| XRF | X-Ray Fluorescence |