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FLUOR

March 15, 2004

Fernald Closure Project
Letter No. C:SP:2004-0013

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 – FEBRUARY 2004 - NPDES PERMIT NUMBER 11000004*GD
FERNALD CLOSURE PROJECT (FCP)**

Enclosed is the February 2004 Noncompliance Report. If you have any questions, please contact me at (513) 648-5294.

Sincerely,



Frank Johnston, Environmental Compliance
Silos & Waste Pits Project

FLJ
Enclosure

Mr. Thomas A. Winston, District Chief
Letter No. C:SP:2004-0013
Page 2

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Project Number 52700
SP Letter Log, MS77

NONCOMPLIANCE REPORT
 NPDES PERMIT NO. 11000004*GD
 FERNALD CLOSURE PROJECT
 U.S. DEPARTMENT OF ENERGY

The following table describes the February 2004 noncompliance 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.

Sewage Treatment Plant Effluent – Outfall *4601			
Date	Parameter	Permit Limit	Actual Value
February 17, 2004	Total Suspended Solids	40 mg/L	52 mg/L
February 24, 2004	Total Suspended Solids	40 mg/L	65 mg/L
February 26, 2004	Total Suspended Solids	40 mg/L	53 mg/L
February 2004	Total Suspended Solids (Avg.)	20 mg/L	34.2 mg/L

The February noncompliances were directly related to dealing with cold weather and freezing conditions within some of the process tanks. This was a continuation of the cold weather related difficulties experienced in January. The thickeners, clarifiers, and effluent tank all experienced freezing.

These freezing conditions precluded the ability to waste sludge for several days resulting in a sludge build-up in the west clarifier and the mixed liquor suspended solids increasing beyond the normal operating range. (The east clarifier was frozen and out of service until February 20). As temperatures warmed, operations staff worked to get the MLSS back into range but this effort has been slow, as material stays suspended longer in cold weather. A contributing factor to the elevated TSS measurements was the relatively low flow rates, which result in abnormally long detention times within the aeration tank.

Past operating experience indicates the STP operation is vulnerable during the cold winter months. All process tanks are above ground and exposed to the weather. Steps have been taken and will continue to be taken to warm the tanks and vulnerable pieces of equipment. Operations staff believes the STP operation will return to normal when warmer weather is experienced. Fluor Fernald Inc. will continue to monitor this situation closely.