



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
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JUL 24 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-0452-03

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

Mr. Pete Sturdevant
Compliance Specialist
Air Quality Management Division
Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 456218-2660

Dear Mr. Saric, Mr. Schneider, and Mr. Sturdevant:

QUARTERLY REPORT ON DRYER STACK, JULY 2003

The purpose of this letter is to transmit the Quarterly Report on Dryer Stack for the Waste Pit Remedial Action Project (WPRAP) at the Fernald Closure Project (FCP) to the United States Environmental Protection Agency (USEPA), the Ohio Environmental Protection Agency (OEPA), and the Hamilton County Department of Environmental Services (DOES).

In response to the OEPA comments on the Draft Remedial Action Package, the DOE-FCP, Fluor Fernald, Inc., and Shaw Environmental, Inc. agreed to provide quarterly reports of any deviations or excursions from emissions limitations, operational restrictions, and control device operating parameter limitations for the dryer stack. If no deviations or excursions occurred during the affected calendar quarter, a report stating so is required.

The information contained in this letter and the enclosure satisfies the commitment for Calendar Quarter April 1 through June 30, 2003. Specifically, there is one incident to report for the time period; the information was reported to the DOES, via electronic mail. A copy of the electronic mail report is enclosed.

JUL 24 2003
DOE-0452-03

Mr. James A. Saric
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-2-

4960

No additional deviations or excursions occurred during the referenced time period.

If you have any questions or comments, please contact Dave Lojek at (513) 648-3127.

Sincerely,



Glenn Griffiths
Acting Director

FCP:Lojek

Enclosure: As Stated

cc w/enclosure:

N. Hallein, EM-31/CLOV
D. Lojek, OH/FCP
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra-Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
D. Carr, Fluor Fernald, Inc./MS1
M. Cherry, Fluor Fernald, Inc./MS52-1
T. Hagen, Fluor Fernald, Inc./MS1
T. Walsh, Fluor Fernald, Inc./MS52-3
ECDC, Fluor Fernald, Inc./MS52-7

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From: Shanks, Pat
To: Peter.Sturdevant@does.hamilton-co.org
Cc: Saric.James@epa.gov; Tom.Schneider@epa.state.oh.us;
Bill.Lohner@epa.state.oh.us; Hagen, Terry; Jewett, Marc; Spradlin, Ted; Spotts, Phil;
Poff, Timothy; Cherry, Mark; Dalga, Dennis; Zdelar-Bush, Diane; Desormeau, Joe;
Lojek, Dave; Skintik, Ed; Houchins, Ronald; Limerick, Phil; Couch, Mark; Yaeger,
Daniel
Subject: Notification of OEPA- Malfunction of Gas Cleaning System (GCS) at WPRAP-
4/18/03

Mr. Sturdevant

This e-mail message is a follow-up to the telephone call that I made to your office on 4/18/03. The purpose of the telephone call was to report a malfunction that occurred at WPRAP on that day. At approximately 0945 hours on 4/18/03, a Health & Safety (H & S) Representative and GCS Operator observed a light haze developing in the southwest corner of the GCS building near the roof. The H & S Representative had a Four-Gas Meter with him (the meter was able to monitor for LEL, O2, CO, and H2S) and took some readings in the general work area. The area around the HEPA filtration systems was monitored and the initial readings for CO were 0 ppm to 2 ppm. Other readings showed that LEL was not an issue, O2 was normal, and H2S was not detected. The reading for CO increased to 6 ppm while the H & S Representative was monitoring the area. The Action Level for CO is 35 ppm. The H & S Representative continued to monitor inside the building. He went up on a platform 15-20 feet above the floor to monitor closer to the light haze. Monitoring on the platform resulted in a sustained level of approximately 25 ppm for CO, with spikes up to 30 ppm. The H & S Representative instructed all personnel inside the building to evacuate and reported the potential problem to appropriate personnel. Feed to the Dryers was immediately suspended. All of the GCS equipment continued to operate.

The GCS Building is designed with five roof ventilation fans to remove heat from the building during the summer months and provide fresh air ventilation to the building. Fifteen minutes after everyone was evacuated from the building, the H & S Representative and Maintenance Supervisor went back into the building to find the source of the leak. By this time, the light haze had dissipated and the level of CO at the floor level was non-detectable. The H & S Representative continued to monitor various areas during the investigation. The source of the leak was discovered near the top of the Wet Electrostatic Precipitator (WESP). The source of the leak was a deteriorated gasket in the Purge Air Heater and Blower System. This System is used to recycle a small portion of the discharge from the WESP back to the internals of the WESP. This recycle line is directed into the area of the high voltage insulators. The recycled air keeps the insulators dry and clean in order to prevent high voltage arc over. The leak was located after the Blower so the recycled air was being forced out into the building and eventually into the environment via the roof ventilation fans. The H & S Representative monitored at or near the leak and obtained readings of approximately 25 ppm for CO, less than 2 ppm for ammonia, and non-detectable for HCL. The leak was repaired and the CO levels at the leak went to non-detectable. The leak was not permanently repaired because the section of the duct where the leak was located is scheduled for replacement in the upcoming maintenance outage, slated for sometime in May, 2003. The Drying operations resumed at 1200 hours on 4/18/03.

This incident was reported to OEPA in accordance with OAC 3745-15-06 due to the fact that the GCS malfunctioned. The release was considered not significant because: 1) only a small portion of the WESP discharge is recycled back into the WESP; 2) feed to the Dryers was suspended immediately, so pit material inside the Dryers became less as time elapsed; 3) the scrubber would have remove some of the organics from the off-gas; 4) the WESP would have removed the majority of the particulate from the off-gas; 5) the leak lasted for a short period of time; and 6) monitoring done by the H & S Representative verified that a small volume of off-gas was released.

If you have any questions, please contact me at 648-4203 or send me an e-mail message.

Pat Shanks
Fluor Fernald

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