



Department of Energy
Ohio Field Office
Fernald Closure Project
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NOV 3 2004

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-0045-05

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

Mr. Peter Sturdevant
Compliance Specialist
Air Quality Management Division
Hamilton County Department
of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45218-2660

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

**FERNALD CLOSURE PROJECT, WASTE PITS PROJECT, FINAL QUARTERLY
REPORT ON DRYER STACK AND NOTIFICATION OF TERMINATION OF DRYER
STACK OPERATIONS, OCTOBER 2004**

The purpose of this letter is to transmit the Final Quarterly Report on Dryer Stack for the Waste Pits Project (WPP) at the Fernald Closure Project (FCP) to the United States Environmental Protection Agency (USEPA), 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 calendar quarter, a report stating so is required.

Mr. James A. Saric
Mr. Tom Schneider
Mr. Peter Sturdevant

The information contained in this letter and the enclosure satisfies the commitment for Calendar Quarter July 1 through September 30, 2004, with extended reporting to cover through October 3, 2004, as Dryer operations at the FCP terminated on October 3, 2004.

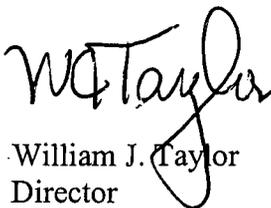
The WPP has begun safe shutdown activities and workers are removing holdup materials and performing utility isolation on the dryer and stack facilities no longer needed. It will take about three months to complete this work, which will then allow for physical demolition of the dryers and associated systems. While dryer operations have ceased at the FCP, there are still wastes that do not require drying that will continue to be loaded into railcars and shipped by unit trains through the Summer of 2005. Unit Train 128 was shipped from the FCP on October 20, and additional unit trains are scheduled to continue to ship two or three times per month.

With only three additional days of dryer operations into October 2004, it was deemed prudent to include this information in this Final Quarterly Report rather than issuing a separate quarterly report in January 2005 to address those three days of October 2004. Specifically, there is one incident to report for this time period. The information on which was reported to the DOES, via electronic mail. A copy of the electronic mail report is enclosed. No additional deviations or excursions occurred during the reference time period.

As noted above, the dryers have been shut down permanently. Activities are now focusing on the cleanout and dismantlement of the dryer system, as well as the off-gas system. As such, this report will be the final one submitted for the Waste Pits Project at the FCP.

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

Sincerely,


William J. Taylor
Director

FCP:Lojek

Enclosure: As Stated

Mr. James A. Saric
Mr. Tom Schneider
Mr. Peter Sturdevant

-3-

DOE-0045-05

cc w/enclosure:

D. Lojek, OH
T. Schneider, OEPA-Dayton (three copies of enclosures)
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:

K. Johnson, OH/FCP
K. Alkema, Fluor Fernald, Inc./MS1
J. Boeckman, Fluor Fernald, Inc./MS52-1
D. Dalga, Fluor Fernald, Inc./MS52-1
P. Shanks, Fluor Fernald, Inc./MS65-2
ECDC, Fluor Fernald, Inc./MS52-7

From: Spotts, Phil
 Sent: Thursday, August 26, 2004 2:23 PM
 To: Peter Sturdevant (E-mail)
 Cc: Bill Lohner (E-mail); Boeckman, Jerry; Carr, Dennis; Cherry, Mark; Couch, Mark; Dalga, Dennis; Desormeau, Joe; Everson, Bob; James Saric (E-mail); Johnston, Frank; Limerick, Phil; Lojek, Dave; Murphy, Con; Philpot, Paul; Reising, Johnny; Skintik, Ed; Tom Schneider (E-mail); Yaeger, Daniel
 Subject: Notification of Shutdown of Thermal Oxidizer at WPP on 8/25/04

Mr. Sturdevant

Pursuant to OAC 3745-15-06, this e-mail message serves as a notification of OEPA of a malfunction that occurred at the Waste Pits Project (WPP). On 8/25/04 at 1452 hours, the FCP site and the WPP facility experienced a sudden power loss. Safety interlocks were activated as a result of the power loss and the WPP facility was placed in a safe configuration per design, stopping feed to the Thermal Drying Units (TDU). Because of the power loss the Emergency Diesel Generator was started and the Gas Cleaning System (GCS), with the exception of the Thermal Oxidizer (TO), was returned to service.

While the TO was out of service, the TDU burners and the feed to the TDU's remained shutdown. At 1510 hours the power was restored and the TO burner re-lit. By 1800 hours, the TDU's were back at operating temperature and feed resumed.

While the TO was shut down a slight yellow haze was seen coming from the dryers exhaust stack, however any emissions are considered minimal based on the following reasons:

- 1) Shutdown of drying operations began immediately upon the loss of power;
- 2) GCS operation was restored immediately after the power loss except for the TO;
- 3) The GCS was operating while the TO was shut down so the only potential emissions from the stack would be a small amount of organics and carbon monoxide which was mitigated by the fact that the TO's temperature remained relatively high even though the burners were no longer operating. This was aided by the fact that with the TDU burners off the volume of exhaust is greatly reduced. The GCS scrubber would remove some of the organics from the off-gas stream and since the TDU's were cooling as the pit material was being processed the potential for emissions were reduced as time elapsed. The time for potential emissions was less than 20 minutes.

This incident is being reported to OEPA as a malfunction since the TO was not operating while waste pit materials was inside the TDU. The TO is considered Best Available Technology for organics and carbon monoxide emissions from the TDU's and must be in operation whenever waste pit materials are being processed inside the TDU's.

If you have any questions, please contact me at 513-648-5295 or send me an e-mail message.

Phil Spotts
 Environmental Compliance
 Fernald Closure Project