





Mark W. Napier, Esquire

-3-

APR 22 1986

bcc: Wayne Range, M-4, w/o encl.  
William J. Grannen, NLO, Inc.  
John Grueulich, WMCO

CONCURREN
RTG. SYMBOL CC-10
INITIALS/SIG.
DATE 4/2/86
RTG. SYMBOL AD-40
INITIALS/SIG.
DATE 4/2/86
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CC-10:RSanders:6-1216:4/18/86

Form 3871, July 1963 447-845

Put your address in the **POST OFFICE** box on the reverse side. Failure to do this will result in the article being returned to you. **The return receipt fee will provide you the name of the person delivered to and the date of delivery.** For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- 1.  Show to whom, date and address of delivery.
- 2.  Restricted Delivery.

3. Article Addressed to:  
 Mark W. Napier, Esquire  
 Martin M. Young & Associates Co., LPA  
 Sixth Floor, 130 East Sixth Street  
 Cincinnati, Ohio 45202

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	P 165 873 810

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee  
 X *[Signature]* Martin Young

6. Signature - Agent  
 X *[Signature]*

7. Date of Delivery  
 4-24-86

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

P 165 873 810

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED FOR CERTIFIED MAIL

(See Reverse)

U.S.G.P.O. 1964-446-014  *  PS Form 3800, Feb. 1962	Mark W. Napier <small>Street and No.</small> 130 East Sixth Street <small>P.O., State and ZIP Code</small> Cincinnati, Ohio 45202																
	<table border="1"> <tr> <td>Postage</td> <td>\$</td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Special Delivery Fee</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee</td> <td></td> </tr> <tr> <td>Return Receipt Showing to whom and Date Delivered</td> <td></td> </tr> <tr> <td>Return receipt showing to whom Date and Address of Delivery</td> <td></td> </tr> <tr> <td>TOTAL Postage and Fees</td> <td>\$</td> </tr> <tr> <td>Postmark or Date</td> <td></td> </tr> </table>	Postage	\$	Certified Fee		Special Delivery Fee		Restricted Delivery Fee		Return Receipt Showing to whom and Date Delivered		Return receipt showing to whom Date and Address of Delivery		TOTAL Postage and Fees	\$	Postmark or Date	
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	Restricted Delivery Fee																
	Return Receipt Showing to whom and Date Delivered																
	Return receipt showing to whom Date and Address of Delivery																
	TOTAL Postage and Fees	\$															
	Postmark or Date																

1115241

By William P. Snyder, April 18, 1986

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5. It is difficult to respond to your request for documents relating to "violation" by NLO of any federal regulations, etc. Your request assumes there have been such violations - an assumption we are not necessarily in a position <sup>to</sup> make. There have been several allegations of violations by ~~various~~ U.S. EPA, and we have enclosed correspondence concerning those allegations. You may note that much, if not all the correspondence to EPA concerning the alleged violations came from DOE, rather than NLO. That is consistent with our ~~position~~ position as the owner of the Facility and everything in it, and our responsibility under the contract with the operator of the facility to oversee operations and give directions about corrective actions, as necessary.



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

**APR 10 1986**

Mark W. Napier, Esquire  
Martin M. Young & Associates  
Co., L.P.A.  
130 East Sixth Street  
Cincinnati, Ohio 45202

Dear Mr. Napier:

This letter supplements our April 2, 1986, response to your January 30, 1986, Freedom of Information Act (FOIA) request.

In searching for reports responsive to item 4 of your request, we have located three other documents that are responsive to item 3 of your request. These documents are dated February 7, 1979, August 21, 1979, and May 21, 1980. Although these documents are not formal occupational, safety, or health complaints received by DOE directly from workers, they are, however, complaints in the sense that they allege radiation exposure as a result of employment at NLO, Inc.

Personal identifiers (name, address, age, and social security number) have been deleted, where indicated, from the May 21, 1980, document and its enclosures. The deletions were made in order to protect the personal privacy of the individual to whom the complaint pertains. Society customarily recognizes an individual's right to maintain the confidentiality of such information, and its release in this situation would not provide any additional benefit to the public. Consequently, these identifiers are exempt from disclosure as "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy" in accordance with 5 U.S.C. §552(b)(6) and 10 C.F.R. §1004.10(b)(6) of DOE's regulations implementing the FOIA.

Addresses were deleted from the February 7, and August 21, 1979, letters in order to protect the privacy of family members still residing at those addresses. Release of this information would not be of additional benefit to the public, and it could lead to unsolicited contact of the individuals residing at those addresses. These deletions were also made pursuant to 10 C.F.R. §1004.10(b)(6) which exempts from mandatory public disclosure "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy."

1115243







Mark W. Napier, Esquire

-4-

APR 2 1986

bcc: Wayne Range, M-4  
Tom Jelinek, SE-33  
Marcia Thomas, SE-33

CONCURRENCES		
RTG. SYMBOL	CC-10...	
INITIALS/SIG.	SEB...	
DATE	4/7/86	
RTG. SYMBOL	SE-33...	
INITIALS/SIG.	JELINEK	
DATE	4/2/86	
RTG. SYMBOL	AD-40	
INITIALS/SIG.	MAR...	
DATE	4/1/86	
RTG. SYMBOL	.....	
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CC-10:RSanders:6-1216:4/2/86



APR 1 1986

Based on our response to item 1, above, there are no documents in DOE's possession that pertain to item 2 of your request, as DOE has not published any reports that link cancer and exposure to uranium, uranium compounds, or other radioactive sources at any DOE facilities. Consequently, we would not have provided any documents pertaining to this subject to NLO, Inc., because no such documents exist.

The enclosure consists of 29 pages and constitutes our complete response to items 1 and 2 of your request. When we complete our response and a final cost determination has been made, we will notify you of the full amount due. At that time, we will also advise you of your right to appeal.

Documents responsive to item 3 of your request will be forwarded to you later this week. You were informed of the status of items 4 and 5 of your request in Mrs. Sanders March 28, 1986, letter.

Sincerely,

P. T. Marquess  
Authorizing Official  
Assistant Manager  
for Administration

CC-10:RSS

Enclosures:  
As stated

bcc: Wayne Range, M-4, w/o encls.  
William R. Bibb, ER-22, w/o encls.  
Paul B. Dunaway, ER-122, w/o encls.

CC-10:RSanders:6-1216:3/31/86

CONCURRENT
RTG. SYMBOL
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INITIALS/SIG.
DATE
3/31/86
RTG. SYMBOL
ER-12
INITIALS/SIG.
BIBB
DATE
3/31/86
RTG. SYMBOL
AD-40
INITIALS/SIG.
MARQUESS
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PDA  
3/31  
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1115249

March 28, 1986

Mark W. Napier, Esquire  
Martin M. Young & Associates  
Co., L.P.A.  
130 East Sixth Street  
Cincinnati, Ohio 45202

Dear Mr. Napier:

This letter is in response to your January 30, 1986, Freedom of Information Act (FOIA) request which was received by the Oak Ridge Operations Freedom of Information Officer on February 12, 1986. With respect to the March 28, 1986, deadline for transmitting to you the documents currently in our possession that respond to your request, which deadline was agreed to in our March 26, 1986, telephone conversation, please be advised that I am in the process of sending to you what we have available. This information will be transmitted to you shortly.

Please be advised that the health physics appraisal reports, requested in item 4. of your request letter, are being retrieved and copied by our Environment, Safety and Health Division. This division has indicated that it will have the documents delivered to me on April 4, 1986. Also, documents responsive to item 5. of your request are being retrieved and copied by the Westinghouse Materials Company of Ohio. That office has indicated that it will forward those responsive documents to me no later than April 4, 1986. It is, therefore, anticipated that we can complete our response to your request by April 11, 1986.

I apologize for any inconvenience that this delay has caused you.

Sincerely,

Original Signed By:

Regina S. Sanders  
Legal Technician  
Office of Chief Counsel

CONCURRENCES
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1115250

Martin M. Young

Richard E. Reverman

Mark W. Napier

Mark B. Weisser

Of Counsel

James Roy Williams

H. W. Young (1908-1977)

**Martin M. Young  
& ASSOCIATES CO., L.P.A.**

Attorneys at Law

Sixth Floor / 130 East Sixth Street / Cincinnati, Ohio 45202  
(513) 721-1078

Other Offices

Tri-County

Northgate-Colerain

Brentwood-Finneytown

Kenwood

Clermont County

Please refer to file number

March 26, 1986

84-438

United States Department of Energy  
Oak Ridge Operations Office, Rm. 1012  
P.O. Box E  
Oak Ridge, Tennessee 37831

Attn: Regina Sanders  
Legal Technician  
Freedom of Information Office

RE: Freedom of Information request

Dear Ms. Sanders:

This letter will confirm our recent telephone conversation at which time I complained that I had still not received a response to my Freedom of Information request of January 30, 1986 despite my previous agreement to an extension for the DOE to respond by March 14.

We agreed that you would send to me by March 28 the information that you currently have in your possession. I also agreed that you would send all other information in response to my request within a few days following March 28.

I believe we have been patient in granting these extensions. Please do your best to fully comply with my request by this new extension.

Very truly yours,

MARTIN M. YOUNG  
& ASSOCIATES CO., L.P.A.

*Mark W. Napier*  
By: Mark W. Napier

MWN/jj

1115251

PERSONNEL - 1  
FBI  
Martin M. Young L.P.A.  
1/6/85

ROUTING AND TRANSMITTAL SLIP		Date	
		February 20, 1986	
TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1. Larry Radcliffe, Research & Waste Management Div. FOIA Coordinator			
2.			
3.			
4.			
5.			
Action	File	Note and Return	
Approval	For Clearance	Per Conversation	
As Requested	For Correction	Prepare Reply	
Circulate	For Your Information	See Me	
Comment	Investigate	Signature	
Coordination	Justify		

**REMARKS**

FOIA REQUEST FOR ACTION  
(Mark W. Napier, dated 1/30/86)

We believe you should take action on items 1 and 2; Dave Howard's group is working the remainder.

cc: Paul Dunaway  
Dave Howard  
Regina Sanders

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Wayne Range, FOIA Officer	
	Phone No.
	6-0885

5041-102

U. S. Government Printing Office: 1979-281-184/8

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

1115252

FILE - 1  
FOIA  
Martin M. Young  
J. Gable  
967

**ROUTING AND TRANSMITTAL SLIP**

Date  
February 12, 1986

*2 photos  
attached for your  
info/convenience.  
PJ*

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. David Howard, ES&H Div., SE-33		
2. ATTN: FOIA Coordinator		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

**REMARKS**

FREEDOM OF INFORMATION REQUEST FOR ACTION  
(Mark W. Napier, dated 1/30/86)

Please note there has been earlier correspondence from Mr. Napier--we have copies in our office should you need them.

cc: Tim Sullivan, CC-10  
Regina Sanders, CC-10

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

<b>FROM:</b> (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Wayne Range, FOIA Officer	1012
	Phone No.
	6-0885

5041-102

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

U. S. Government Printing Office: 1979-281-184/8

1115253

Martin M. Young  
Richard E. Reverman  
Mark W. Napier  
Mark B. Weisser  
Of Counsel  
James Roy Williams  
H. W. Young (1906-1977)

Martin M. Young  
& ASSOCIATES CO., L.P.A.  
Attorneys at Law

Sixth Floor/130 East Sixth Street/Cincinnati, Ohio 45202  
(513) 721-1078

Other Offices  
Brentwood-Finneytown  
Northgate-Colerain  
Tri-County  
Clermont County  
Please refer to file number

January 30, 1986

Wayne Range  
Freedom of Information Officer  
Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37831

06 FEB 12 P 4: 49  
FREEDOM OF  
INFORMATION OFFICE  
USDOE ORO

RE: Freedom of Information Request

Dear Mr. Range:

Under the provisions of the Freedom of Information Act, 5 U.S.C. 552, I am requesting copies of records relating to the Feed Materials Production Center in Fernald, Ohio and also information held by the Department of Energy regarding the health risk of cancer from exposure to uranium, uranium compounds, or other radioactive sources encountered by workers at the FMPC.

The specific records that I request are as follows:

1. Toxicology, clinical, occupational, or epidemiological studies or research conducted by the AEC, ERDA, or DOE regarding the health risk of cancer from exposure to uranium, uranium compounds, or other radioactive sources encountered by workers at the FMPC.
2. Research, reports, memorandum, correspondence, or other information provided by the AEC, ERDA, or DOE to NLO, Inc. or NL Industries as the past operators of the FMPC regarding the health risk of cancer from exposure to uranium, uranium compounds, or other radioactive sources encountered by workers at DOE facilities.
3. Health and safety complaints received by the AEC, ERDA, or DOE from workers or their representatives regarding exposure to uranium at the FMPC.

1115254

Wayne Range  
Freedom of Information Officer  
Department of Energy  
January 30, 1986  
Page Two

4. Annual, periodic, or special health physics appraisals, reports, or investigations conducted by the AEC, ERDA, or DOE of the FMPC during the period 1955 through 1985.
5. Violations by NLO, Inc. of any federal regulations, statutes, or rules applicable to NLO, Inc.'s operation of the FMPC.

*1/30/86*  
*100 file do*  
*for Kirk Collins*

Please consider this letter an assurance of our willingness to pay fees in this matter. Please inform me, however, of the expected cost before filling my request if the total expected cost exceeds \$600.00.

If all or any part of this request is denied, please state the specific exemption that you believe justifies your refusal to release the information and also please inform me of the appeal procedures available to me.

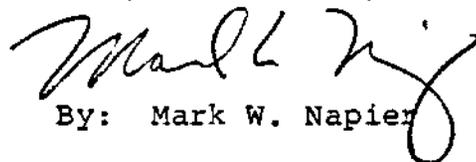
As you may recall, a partly similar request was submitted by me previously in a letter dated April 5, 1985. Our request in that letter for waiver of fees was eventually denied. You may wish to refer to your letter dated June 12, 1985 when responding to my request for information regarding the estimated costs.

I would appreciate your prompt handling of this request and look forward to hearing from you within ten days.

Thank you for your assistance.

Very truly yours,

MARTIN M. YOUNG  
& ASSOCIATES CO., L.P.A.

  
By: Mark W. Napier

MWN/jj

1115255



**Department of Energy**

Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37831

March 5, 1986

Mr. Thomas A. Winston, Chief  
Office of Land Pollution Control  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Mr. Winston:

**NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580**

Enclosed is a report documenting an NPDES noncompliance DOE/ORO received recently from the Westinghouse Materials Company of Ohio, ORO Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

Enclosure:  
One Report

cc w/enclosure:

J. R. Barker, EH-24, FORSTL

J. A. Reafsnyder, DP-84

→ J. K. Alexander, SE-331 (2)

Enclosures to 4/22/86 H v.  
Marquess to Napier

1115256

SPECIAL



INSTRUCTIONS: In accordance with Section 4121-10 of THE OHIO WORKMEN'S COMPENSATION ACT, every employer shall keep a record of ALL injuries received by his employes in the course of their employment and report same to The Bureau of Workmen's Compensation upon forms provided for that purpose. THIS APPLICATION MUST BE FULLY COMPLETED AND SHOULD BE FILED WITH THE BUREAU PROMPTLY. Part I of this form must be completed by the employer, by whom the deceased was employed when his disability began, or his authorized agent. Part II of this form must be completed and signed by the claimant. Mail this report in its completed form to The Bureau of Workmen's Compensation, Claims Section, Columbus, Ohio.

FOR OCCUPATIONAL DISEASE ONLY Claim No. 174972 O.D.
STATE OF OHIO
BUREAU OF WORKMEN'S COMPENSATION
First Notice of Death and Preliminary Application
EMPLOYER'S REPORT

PART I

EMPLOYER
1. Name of employer: National Lead Company of Ohio
Office Address: Fernald Sita Cincinnati, Ohio
Nature of business: Manufacturing Type of Organization: Corporation
DECEASED EMPLOYEE
2. Name of deceased: [Redacted]
Address: [Redacted]
3. Sex: Male Single, Married, Divorced, Widowed
4. Number and relationship of dependents: 1 wife

OCCUPATIONAL DISEASE (TIME) Fernald Sita, National Lead Company of Ohio
5. Where was disease contracted: [Redacted]
6. Date quit work: 9-26-76 Date of death: April 6, 1977
7. What was deceased's occupation? Chemical Operator
8. Explain fully the kind of work deceased was doing when disability began: Observes and/or operates various assigned equipment such as chemical process apparatus performing an operation or a sequence of operations, to carry out chemical or physical reactions or to produce, alter, or transfer material.
9. How long had deceased been doing this work? Since 1953
10. Experience of deceased employe in this type of work during life time: Since 1946
11. When did the last period of employment with this employer begin? 6-1-53
12. Name the employers for whom deceased had worked during the three years preceding the beginning of the disability, and give their addresses and business: Not known other than employment with National Lead Company of Ohio.

17. Decedent's earnings were reported on payroll reports of Risk No. 244797
Under Manual No. 7771 (now 9063)

By signing below, I do hereby certify that I have authority to execute this Employer's Report and that the answers to the questions given in said report are correct to the best of my information and belief; that the deceased herein named was, on the date shown herein, an employe of the undersigned and at the time of entering into the employment from which the disease is claimed to have resulted (did not) represent himself as not having previously suffered from such disease.
Date report sent to claimant: For [Signature]
Director of Personnel & Industrial Relations
National Lead Company of Ohio

Table with 15 rows: Age, Sex & c., Dependents, Location (Geo.), Date Report Filed, Date of Death, Report Lag, Hearing Lag, Payment Lag, Occupation, Experience, Agency (District), Agency Part, Type of Disease, Nature of Inj., Part of Body, Full Wage, Average Wage, Treatment, Complications, Degree of Injury, Days Lost, Cased by, Manual No., Risk No.

1115257

INSTRUCTIONS: In all cases of death resulting from occupational disease, claims for compensation shall be forever barred unless within SIX MONTHS after death due to the disease, application shall be made to Bureau of Workmen's Compensation.

## CLAIMANT'S PRELIMINARY APPLICATION

### PART II

I hereby make application to THE BUREAU OF WORKMEN'S COMPENSATION for the payment of money out of the State

Occupational Disease Fund on account of the death of John H. Scarbor resulting from an occupational disease contracted in the course of employment and hereby request that all forms necessary for the proper proof of my claim be furnished to me, free of charge. I further state that the following statements are true to the best of my knowledge:

1. Name of deceased: [REDACTED]
2. From what disease was deceased suffering? Continuous exposure to chemicals
3. What were the symptoms? .....
4. When did these symptoms first appear? ..... (Date)
5. Who was the employer of deceased when symptoms first appeared? National Lead Company of Ohio
6. Had deceased previously suffered from this disease? .....
7. When did deceased last become a resident of Ohio? .....
8. Give the name and address of the employer or employers for whom deceased worked for five years next preceding death: .....
9. On what day did deceased quit work on account of this disease? .....
10. Give date of death: April 5, 1977 Hour of day: .....
11. Name of attending Physician Dr. Stephen M. Gorman Address: .....
- Dr. Albert F. Muhleman
12. Name of Undertaker: Sibbett Funeral Home Address: Mooresville, Indiana
13. Was autopsy performed? ..... By whom? .....
14. Do you consent to autopsy if necessary for diagnosis? .....
15. Give names and present addresses of dependents: [REDACTED]
16. Has deceased have on file with The Bureau of Workmen's Compensation any claims for compensation for injury? .....

Claim Nos. [REDACTED]

Date received from employer: [REDACTED] /a/ [REDACTED]

(Signature of claimant)

Date returned to employer: [REDACTED]

Penalty for fraudulently causing or attempting to cause money to be paid from funds from which awards are made by The Bureau of Workmen's Compensation, see R.C. Section 4123.67, 4123.67.

1115258

**INSTRUCTIONS:** In all cases of death resulting from occupational disease, claims for compensation shall be forever barred unless within SIX MONTHS after death due to the disease, application shall be made to Bureau of Workmen's Compensation.

## CLAIMANT'S PRELIMINARY APPLICATION

### PART II

I hereby make application to THE BUREAU OF WORKMEN'S COMPENSATION for the payment of money out of the State

Occupational Disease Fund on account of the death of John H. Scarber resulting from an occupational disease contracted in the course of employment and hereby request that all forms necessary for the proper proof of my claim be furnished to me, free of charge. I further state that the following statements are true to the best of my knowledge:

1. Name of deceased: [REDACTED]
2. From what disease was deceased suffering? Continuous exposure to chemicals
3. What were the symptoms?.....
4. When did these symptoms first appear?..... (Date)
5. Who was the employer of deceased when symptoms first appeared? National Local Company of Ohio
6. Had deceased previously suffered from this disease?.....
7. When did deceased last become a resident of Ohio?.....
8. Give the name and address of the employer or employers for whom deceased worked for five years next preceding date of death.....
9. On what day did deceased quit work on account of this disease?.....
10. Give date of death: April 5, 1977 Hour of Day:.....
11. Name of attending Physician Dr. Stephen M. Gorman Address:.....  
Dr. Albert F. Muhleman
12. Name of Undertaker: Sibbett Funeral Home Address: Mooreville, Indiana
13. Was autopsy performed?..... By whom?.....
14. Do you consent to autopsy if necessary for diagnosis?.....
15. Give names and present addresses of dependents: [REDACTED]
16. I advise that I have on file with The Bureau of Workmen's Compensation a claim for compensation for injury.....  
Claim Nos. ....
- Date received from employer: /s/ [REDACTED] (Signature of claimant)
- Date returned to employer: [REDACTED] (Street Address and City or Town)

For penalty for fraudulently causing or attempting to cause money to be paid from funds from which awards are made by The Bureau of Workmen's Compensation, see R.C. Chapter 4123-11-4123-17.

1115259

SPECIAL



INSTRUCTIONS: In accordance with Section 4125-28 of THE OHIO WORKMEN'S COMPENSATION ACT, every employer shall keep a record of ALL injuries received by his employes in the course of their employment and report same to The Bureau of Workmen's Compensation upon forms provided for that purpose. THIS APPLICATION MUST BE FULLY COMPLETED AND SHOULD BE FILED WITH THE BUREAU PROMPTLY. Part I of this form must be executed by the employer by whom the decedent was employed when his disability began, or his authorized agent. Part II of this form must be completed and signed by the claimant. Mail this report in its completed form to The Bureau of Workmen's Compensation, Claims Section, Columbus, Ohio.

FOR OCCUPATIONAL DISEASE ONLY Claim No. O. D. 174972
STATE OF OHIO
BUREAU OF WORKMEN'S COMPENSATION
First Notice of Death and Preliminary Application
EMPLOYER'S REPORT

PART I

1. EMPLOYER
1. Name of employer: National Lead Company of Ohio
2. Office Address: Fernald Site Cincinnati, Ohio
3. Nature of business: Manufacturing Type of Organization: Corporation
DECEASED EMPLOYEE
4. Name:
5. Home Address:
6. Age: 39 Male Single, Married, Married Social Security No.
7. Number and relationship of dependents: 1 wife
8. Was deceased a partner, member of firm or owner of business? No

OCCUPATIONAL DISEASE (TIME)
9. Where was disease contracted: Fernald Site, National Lead Company of Ohio
10. Date quit work: 9-21-76 Date of death: April 6, 1977
11. What was deceased's occupation? Chemical Operator
12. Explain fully the kind of work deceased was doing when disability began: Observes and/or operates various assigned equipment such as chemical process apparatus performing an operation or a sequence of operations, to carry out chemical or physical reactions or to produce, alter, or transfer material
13. How long had deceased been doing this work? Since 1953
14. Experience of deceased employe in this type of work during life time: Since 1946
15. When did the last period of employment with this employer begin? 6-1-53
16. Name the employers for whom deceased had worked during the three years preceding the beginning of the disability, and give their addresses and business: Not known other than employment with National Lead Company of Ohio.

17. Decedent's earnings were reported on payroll reports of Risk No. 244757
Under Manual No. 7771 (now 9063)

By signing below, I do hereby certify that I have read and to execute this Employer's Report and that the answers to the questions given in said report are correct to the best of my information and belief; that the deceased herein named was, on the date shown herein, an employe of the undersigned and at the time of entering into the employment from which the disease is claimed to have resulted (did not) represent himself as not having previously suffered from such disease.

Date report sent to claimant: For: [Signature]
Date received from claimant:
Date mailed to Bureau: National Lead Company of Ohio

Table with 17 rows and 1 column. Headers: Age, Sex & c. c., Dependents, Location (Geo.), Date Report Filed, Date of Death, Report Lag, Hearing Lag, Payment Lag, Occupation, Experience, Agency (D), Agency P, Type of D, Nature of, Part of I, Full Wage, Average Wage, Treatment, Complications, Degree of Injury, Days Lost, Coded by, Manual No.



INSTRUCTIONS: In accordance with Section 4122.28 of The Ohio Workers' Compensation Act, every employer shall keep a record of ALL injuries and occupational diseases received or contracted by his employees in the course of their employment and report those injuries and occupational diseases to the Industrial Commission of Ohio upon forms prepared for that purpose. THIS IS AN APPLICATION FOR PAYMENT OF COMPENSATION AND MEDICAL EXPENSE. Use this form when disease causes disability of more than seven days. Part I of this form must be completed and signed by the disabled employee. Part II of this form must be completed by the attending physician unless that was certified when his disability began, or his authorized official. Part III of this form must be completed by the attending physician. Applications for compensation for occupational diseases are forever barred unless filed with The Industrial Commission of Ohio within 2 years after disability due to the disease begins, or within such longer period as does not exceed 4 years months after diagnosis of the occupational disease by a licensed physician. EXCEPT in cases of claims for disability from ALLERGIC, autoimmune or viral disease, pneumoconiosis, DISEASES OF THE HEARING EIGHTH NERVE resulting from exposure to noise, or occupational and non-occupational diseases of the fingers and joints, which follow exposure to cancer, lead, gas, fumes and other toxic vapors in which cases applications are forever barred unless filed within 180 days after total disability began or within such longer period as does not exceed 4 years months after diagnosis of such disease by a licensed physician.



**INDUSTRIAL COMMISSION OF OHIO  
BUREAU OF WORKERS' COMPENSATION**

Claim No.

O. D. 176800

**PART I Claimant's Report of Occupational Disease**

1. CLAIMANT'S NAME: [Redacted] (First) [Redacted] (Middle Initial) [Redacted] (Last)

2. Home Address: [Redacted] (Number) [Redacted] (Street) [Redacted] (City) [Redacted] (County) [Redacted] (State) Tel. No. [Redacted]

3. Age: [Redacted] Social Security No. [Redacted] Employer: General Head Co. Occupation: Operator No. and relationship of dependents: 3 wife & 2 daughters

4. From what disease are you suffering? Bronchial Condition, Asthma, etc.

5. What parts of the body are affected? Lungs, Heart, Liver, Kidneys  
Give date your symptoms first appeared: 1945 Name of employer when symptoms appeared: SAME  
How long in employ of this employer before symptoms first appeared? 16 yrs.

6. Location of plant where you worked, when disability began: Fernald Ohio, Butler County (County and City)

7. When were symptoms first reported to employer? Dec. 19, 1979

8. Describe exactly how you were exposed to the substance, which, in your opinion caused your disease:  
General & Domestic, Hot Presses, Chip Grinding, Crushers, Washers, Hydraulic Extractors, Highly Toxic Materials, Trichloroethylene, Lime, Insulation, Black Oil, Uranium Dust, Alkalis, Solvents, Dusts, Fumes, Manure, etc.

9. Give name and address of physician who first diagnosed your disease as being occupational, and date diagnosis made: DR. G. SCUDER 1/10/80, DR. W. J. WILSON 1/22/80, DR. P. FRABLE 1/23/80 (Quosstown)

10. Have you previously suffered from the disease for which this application is made, or any other occupational disease? Yes If so, give details (dates of attacks, name and address of physician, name of occupation, etc.):  
1. Date quit work: Dec. 19, 1979 For what reason? Lung Condition  
2. Date returned to work: Jan 14, 1980 Type of work: Operator  
3. Occupation when disability began: Operator Type of work you were doing when disability began: Operator Length of time in this type of work (a) immediately prior to onset of symptoms: 26 years  
(b) During lifetime: 26 years

11. Were you exposed to dust in your work? Yes Type of dust: Uranium, Lime, Plastic Sides  
Describe briefly how you were exposed: By running equipment as in general use of the plant  
Over what periods were you exposed in your employment? All 26 years  
Date of last exposure to dust: 1980

12. If you were exposed to the substance which allegedly caused this disease in other employments, give the names and addresses of the other employers, and dates of employments: None, only job since then military service

13. Have you filed a previous application concerning this or any other occupational disease? No  
If so, give claim number: \_\_\_\_\_

I hereby certify that the information furnished herein is true and correct to the best of my knowledge and belief, and I hereby authorize the Industrial Commission to use the same in any proceeding it may deem proper in the event of a hearing held pursuant to this application for payment out of the State Occupational Disease Fund.

Signature of claimant: [Redacted]

Street Address: [Redacted]

City or Town: [Redacted]

**PART II Employer's Report of Occupational Disease**

Name of employer: Gen. Head Co. (Name as shown on Insurance Certificate)

Office address: P.O. Box 158, Fernald, Ohio Tel. No. [Redacted]

Nature of business: \_\_\_\_\_ Type of organization: \_\_\_\_\_

On the earnings of the injured employee for services rendered in time of injury, all diseases are being reported.

On payroll reports of File No. 244121 Manual No. 1063

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Nature of Disease
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Treatment
Indemnity
Degree of Injury
Date Lost
Form No.

ODT-3  
U.K. 2

1115262



**INSTRUCTIONS:** In accordance with Section 4112.21 of The Ohio Workers' Compensation Act, every employer shall keep a record of all occupational diseases contracted by his employees in the course of their employment and report these injuries or diseases to the Industrial Commission of Ohio when forms provided for that purpose **WITHIN 90 DAYS** after the date of COMPENSATION AND MEDICAL EXPENSES. Use this form when disease caused disability of more than seven days. Part I of this form must be completed and signed by the disabled employee. Part II of this form must be executed by the employer by whom the employee was employed when his disability began, or his authorized official. Part III of this form must be executed by the attending physician in connection with his compensation for occupational disease. For occupational diseases are lower respiratory tract filed with The Industrial Commission of Ohio within 90 days after the date of onset of the disease, or within such longer period as does not exceed 6 months after diagnosis of the occupational disease by a licensed physician, EXCEPT in cases of claims for disability from SIICORIS, asbestososis, silicosis, pneumoconiosis, DEGLASSIA or the PERIPHERAL NERVE TRAIL resulting from injurious exposure to dusts or cardiovascular and pulmonary diseases of the heart and lungs therefor, where exposure to cancer-causing fumes and other toxic vapors in which cases applications are hereby waived in the claim within 90 days after the date of diagnosis or within such longer period as does not exceed 6 months after diagnosis of such disease by a licensed physician.



**INDUSTRIAL COMMISSION OF OHIO  
BUREAU OF WORKERS' COMPENSATION**

Claim No.

**O. D. 176800**

**PART I  
Claimant's Report of Occupational Disease**

1. CLAIMANT'S NAME: [Redacted] (Name) [Redacted] (Address) [Redacted] (City) [Redacted] (County) [Redacted] (State) [Redacted] (Zip)

2. Home Address: [Redacted] (Number) [Redacted] (Street) [Redacted] (City) [Redacted] (County) [Redacted] (State) [Redacted] (Zip)

3. Age: **49** Social Security No.: [Redacted] Employer: **Putnam Lumber Co.**

Occupation: **Deconsecration** No. and relationship of dependents: **3 wife & 2 children**

4. From what disease are you suffering? **BRONCHIAL CONDITON, ASTHMA, emphysema**

5. What parts of the body are affected? **lungs, throat, sinuses, kidneys**

Give date your symptoms first appeared: **12/19/79** Name of employer when symptoms appeared: **SAME**

How long in employ of this employer before symptoms first appeared? **16 yrs**

6. Location of plant where you worked, when disability began: **Putnam Lumber Co., Butler County, Ohio**

7. When were symptoms first reported to employer? **DEC. 19, 1979**

8. Describe exactly how you were exposed to the substance, which, in your opinion caused your disease:  
**working in deconsecration, hot presses, chip handling, crushers, unloading, nitrogen extractions, highly toxic materials, trichloroethylene, lime, dusts, black smoke, uranium dust, alkalis, solvents, dusts, fumes, ammonia, etc.**

9. Give name and address of physician who first diagnosed your disease as being occupational, and date diagnosis made: **DR. G. SCUDLER 1/1/80, DR. W.J. LUNBY 1/23/80, DR. P. FRABLE 1/23/80 (no treatment)**

10. Have you previously suffered from the disease for which this application is made, or any other occupational disease? **YES** If so, give details (dates of attacks, name and address of physicians, same as above)

11. Date quit work: **DEC. 19, 1979** For what reason? **lung condition**

12. Date returned to work: **JAN 19, 1980** Type of work: **Deconsecration Operation**

13. Occupation when disability began: **Deconsecration Treatment** (Type of work you were doing when disability began: **Deconsecration Treatment** Length of time in this type of work (a) immediately prior to onset of symptoms: **26 years** (b) During lifetime: **26 years**)

14. Were you exposed to dust in your work? **YES** Type of dust: **uranium, lime, trichloroethylene, etc.**  
Describe briefly how you were exposed: **By running equipment as in yard on 8' high belt.**  
Over what periods were you exposed in your employment? **All 26 years.**  
Date of last exposure to dust: **1980**

If you were exposed to the substance which allegedly caused this disease in other employments, give the names and addresses of the other employers, and dates of employments: **none, only for other than military services**

15. Have you filed a previous application concerning this or any other occupational disease? **no**  
If so, give claim number: \_\_\_\_\_

I hereby certify that the information herein is true and correct to the best of my knowledge and belief, and I hereby authorize the Industrial Commission to use any amounts which may be awarded against the responsible employer for payment out of the State Occupational Disease Fund.

Signature of applicant: [Redacted] (Signature of applicant, if unable to sign, mark must be made)

Street Address: [Redacted]

City or Town: [Redacted]

**Employer's Report of Occupational Disease**

Name of employer: **Putnam Lumber Co.** (Name as shown on insurance policy)

Office address: **P.O. Box 158, Lima, Ohio** Tel. No. [Redacted]

Name of Business: \_\_\_\_\_ Type of organization: \_\_\_\_\_

Title of the injured employee for services rendered or time of absence: \_\_\_\_\_ Disease are being reported: \_\_\_\_\_

On payroll reports of Risk No. **244 1971** Manual No. **106-3**

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Westinghouse  
Materials Company  
of Ohio

PO Box 398704  
Cincinnati Ohio 45239

(513) 738 6200

WMCO:EH(EC):86-0037

February 6, 1986

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, OH 45239

Dear Mr. Reafsnyder:

SUBJECT: REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 86-01

Outfall (Name and Number): Sewage Treatment Plant - 001A

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
January, 1986	BOD <sub>5</sub>	5.0 kg/day	6.0 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Although BOD<sub>5</sub> concentrations were within the expected range of values for the sewage treatment plant effluent, above-average discharge flows caused the loading limit of 5.0 kg/day (daily average) to be exceeded at sampling location 001A for the month of January. WMCO is currently investigating alternatives to reducing BOD<sub>5</sub> loadings to the sewage treatment plant.

Very truly yours,

David L. Jones  
Environmental Compliance

DLJ/dsm

cc: L. Bogar	D. B. Howard
W. Britton	L. Pennington
R. H. Cross (ORO)	W. Weinreich
B. J. Davis (ORO)	
L. C. Dolan	Central Files

1115265



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

January 29, 1986

Mr. Thomas A. Winston, Chief  
Office of Land Pollution Control  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Mr. Winston:

**NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580**

Enclosed are reports documenting three NPDES noncompliances DOE/ORO received recently from the Westinghouse Materials Company of Ohio, ORO Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bobby Joe Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

Enclosure:  
Three Reports

cc w/encl:  
J. R. Barker, EH-24, FORSTL  
J. A. Reafsnyder, DP-84  
→ J. K. Alexander, SE-331 (2)

1115266

**Westinghouse  
Materials Company  
of Ohio**

PO Box 398704  
Cincinnati, Ohio 45239

(513) 738 6200

January 14, 1986

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-25

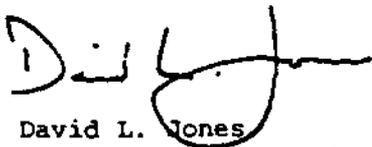
Outfall (Name and Number): Sewage Treatment Plant - 001A

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
November 20, 1985	Total Suspended Solids	10.0 kg/day	14.8 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Upon completion of the NPDES Quarterly Report, an oversight in reporting the above noncompliance was detected. The daily maximum limit for total suspended solids (TSS) at the 001A location was exceeded on November 20, 1985, and inadvertently not reported. The noncompliance (14.8 kg/day) occurred during a period of heavy rain and increased flow; however, the NPDES limit was not exceeded on a TSS concentration basis. Rainfall for the month was well above average and increased flow through the treatment facility resulted. The current Storm Sewer Evaluation Survey (SSES) should identify sources of additional flows (infiltration/inflow) due to precipitation/runoff which may enter the sanitary collection system.

Sincerely,



David L. Jones  
Environmental Compliance

DLJ/vvs

cc: L. Bogar                      ✓ D. B. Howard  
W. Britton                      L. Pennington  
R. H. Cross                      W. Weinreich  
B. J. Davis  
C. Dolan                      Central Files

1115267



WMCO:EH(EC):86-0013

**Westinghouse  
Materials Company  
of Ohio**

PO Box 398704  
Cincinnati, Ohio 45239  
(513) 738 6200

January 14, 1986

J. A. Reafsnyder  
Site Manager  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-24

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
November, 1985 (month)	Total Suspended Solids	12.8 kg/day	26.4 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Upon further evaluation of the November NPDES data, an error was detected in the calculation of the daily average for total suspended solids at the Combined General Sump & Clearwell location (001B & 001C). The actual daily average for the month of November is 26.4 kg/day and is primarily due to the fact that the daily maximum was greatly exceeded on November 12 (112.4 kg/day) because of excessive flow from the Clearwell (five times the average). As noted in Report No. 85-18, reduced Clearwell pumping shall be implemented whenever possible in order to alleviate such problems.

Sincerely,

David L. Jones  
Environmental Compliance

DLJ/vvs

- cc: L. Bogar
  - W. Britton
  - R. H. Cross
  - B. J. Davis
  - L. C. Dolan
  - B. B. Howard
  - L. Pennington
  - W. Weinreich
- Central Files

1115268

**Westinghouse  
Materials Company  
of Ohio**

PO Box 398704  
Cincinnati, Ohio 45239

(513) 738 6200

WMCO:DLJ: 86-001

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 398704  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-23

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
December (month)	Total Iron	0.41 kg/day	0.44 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to the daily maximum noncompliance recorded on December 3, 1985 (1.02 kg Fe/day, as shown in Report No. 85-23), the total iron loading limit (daily average) for the month of December was exceeded as noted above. Other than the December 3 excursion, iron concentrations and flows from the Clearwell and General Sump appeared normal. Reduced pumping from the Clearwell would have alleviated the December 3 noncompliance.

Sincerely yours,

  
L. C. Dolan

DLJ/vvs

cc: L. Bogar  
W. Britton  
G. Butterworth  
R. H. Cross  
B. J. Davis  
L. C. Dolan  
D. B. Howard  
L. Pennington  
W. Weinreich

Central Files

JAN 10 1986

1115269



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

January 14, 1986

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

**NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580**

Enclosed are reports documenting two NPDES noncompliances DOE/ORO received recently from the ORO Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. J. Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

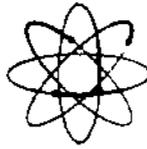
Enclosure:  
Two Reports

cc w/encl:  
J. R. Barker, EH-24, FORSTL  
J. A. Reafsnyder, DP-84  
→ J. K. Alexander, SE-331 (2)

1115270

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

JE . . .

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-19

Outfall (Name and Number): General Sump and Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
November 20, 1985	Hexavalent Chromium	0.008 kg/day	0.010 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to excessive flow from the Clearwell (0.521 MGD) on November 20, an increase in the hexavalent chromium loading was evidenced at the 001B & 001C sampling location. Runoff from an intense rainfall combined with normal site-wide sump operations was the primary cause of the aforementioned NPDES exceedance. Reduced pumping of the Clearwell, when possible, should alleviate such occurrences.

Sincerely yours,

R. M. Spenceley  
Manager

DLJ/vvs

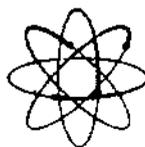
cc: R. H. Cross            D. L. Jones  
     E. J. Davis            N. R. Leist  
     D. A. Fleming          L. Pennington  
     ✓ D. B. Howard          E. M. Nutter  
     D. G. Howell           R. B. Weidner

Central Files

1115271

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513 - 738 - 8200

DEC 5 1985

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, OH 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-22

Outfall (Name and Number): Combined General Sump & Clearwell - 001 B&C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
December 3, 1985	Total Iron	0.85 kg/day	1.02 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Above average flow from the clear well (0.439 mgd) due to excessive precipitation caused the total iron loading to increase at the 001 B&C sampling location. This occurrence could be alleviated by reduced clearwell pumping when feasible.

Sincerely yours,  
Original Signed By  
**R. M. SPENCELEY**  
Manager  
R. M. Spenceley  
Manager

DLJ/psg

cc: R. H. Cross                    D. G. Howell  
     B. J. Davis                    D. L. Jones  
     D. A. Fleming                  N. R. Leist  
     D. B. Howard                  E. M. Nutter  
                                     L. Pennington  
     Central Files                  R. B. Weidner

A PRIME CONTRACTOR FOR THE DEPARTMENT OF ENERGY

1115272



**Department of Energy**

Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37831

December 23, 1985

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

NPDES COMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are reports documenting five NPDES noncompliances DOE/ORO received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. J. Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

Enclosures:  
Three Reports

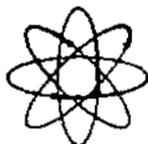
cc w/encls:  
John Barker, EH-24, FORSTL  
J. A. Reafsnyder, DP-84  
J. K. Alexander, SE-331 (2)

1115273

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-8200

DEC 10 1985

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, OH 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580: REPORT NO. 85-21

Outfall (Name and Number): Sewage Treatment Plant - 001A

Date	Parameter	Permit Limit	Actual Measurement
November, 1985	BOD <sub>5</sub>	5.0 kg/day	6.4 kg/day
November, 1985	Total Suspended Solids	5.0 kg/day	5.8 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Concentrations of BOD<sub>5</sub> and total suspended solids were not above average or in noncompliance for the entire month; however, higher pollutant loadings were evidenced at the 001A location due to increased flow through the treatment facility. The increased flow was most likely due to the excessive precipitation during November, 1985 (8.86 inches).

Sincerely yours,  
Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

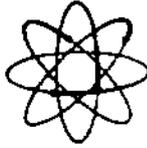
DLJ/psg

cc: R. H. Cross N. R. Leist  
B. J. Davis E. M. Nutter  
D. A. Fleming L. Pennington  
D. B. Howard R. B. Weidner  
D. G. Howell  
D. L. Jones Central Files

1115274

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

DEC 10 1985

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, OH 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-20

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

Date	Parameter	Permit Limit	Actual Measurement
November, 1985	Hexavalent Chromium	0.004 kg/day	0.015 kg/day
November, 1985	Copper	0.025 kg/day	0.027 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

As indicated in Reports Nos. 85-18 and 85-19, excessive rainfall during the month of November caused increased loadings of hexavalent chromium and copper at the 001B & C sampling location. These prior daily maximum exceedances have led to the noncompliance of the daily average values for hexavalent chromium and copper during November as noted above. Corrective measures entail the completion of the biodenitrification surge lagoon and reduced clear well pumping when feasible. It should be noted that 8.86 inches of rainfall was recorded at the site for the month of November, 1985.

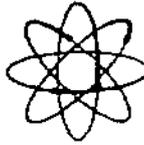
Sincerely yours,  
Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/psg

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner  
Central Files

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

NOV 21 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-18

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

Date	Parameter	Permit Limit	Actual Measurement
November 12, 1985	Total Suspended Solids	12.8 kg/day	112.4 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

As reported in the November 18 letter of noncompliance (Report No. 85-16), a flow of 953,500 gallons was pumped from the Clearwell on November 12, 1985. This flow, generated from the excessive precipitation in early November and the regular sitewide sump operations, was approximately five times the normal clearwell discharge. When combined with an above-average concentration of suspended solids due to rainfall runoff (31 mg/L at the clearwell location), this flow produced an excessive TSS loading at the 001B and 001C sampling location, resulting in the reported noncompliance. A reduction of clearwell pumping is implemented whenever possible in order to alleviate such problems.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/vvs

cc: R. H. Cross  
✓ E. J. Davis  
D. A. Fleming  
D. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
L. Pennington  
E. M. Nutter  
R. B. Weidner

1115276



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

November 26, 1985

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

NPDES COMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are reports documenting eight NPDES noncompliances DOE/ORO received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. J. Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

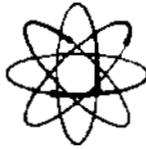
Enclosures:  
Five Reports

cc w/encls:  
D. R. Sheppard, PE-24, GTN  
J. A. Reafsnyder, DP-84  
J. K. Alexander, SE-331 (2)

1115277

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-6200

OCT 30 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-13

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
October 24, 1985	Hexavalent Chromium	0.008 kg/day	0.009 kg/day
October 24, 1985	Iron	0.85 kg/day	1.16 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to excessive rainfall (2.74 inches) evidenced at the site several days prior to the reported violations, additional pumping was required at the Clearwell location. This rainfall, occurring subsequent to approximately a month of dry weather, may have caused an initial "flush" of material from site-wide control pads into respective treatment sumps. Increased pumping at the Clearwell location compounded the problem and the reported exceedances occurred. A reduction of this pumping, if feasible, may alleviate the problem.

Sincerely yours,  
Original Signed By:  
**R. M. SPENCELEY**  
Manager

R. M. Spenceley  
Manager

DLJ/vvs

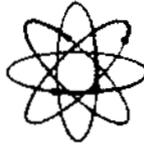
cc: R. H. Cross            L. Pennington  
     B. J. Davis            R. B. Weidner  
     D. A. Fleming  
     ✓D. B. Howard        Central Files  
     D. G. Howell  
     D. L. Jones  
     N. R. Leist  
     E. M. Nutter

1115278

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

NOV 8 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-14

Outfall (Name and Number): Storm Sewer Outfall - 002

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
October (month)	Total Suspended Solids	30 mg/L	70 mg/L

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to excessive rainfall and increased construction operations during the month of October, the NPDES parameter limit for total suspended solids was exceeded based on the daily average requirements. Completion of the storm water retention basin should alleviate such a problem in the future.

Sincerely yours,

Original of

R. M. Spenceley

Manager

R. M. Spenceley

Manager

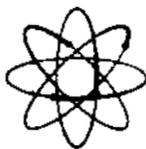
DLJ/vvs

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner  
Central Files

1115279

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

NOV 8 1985

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-15

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
October (month)	Hexavalent chromium	0.004 kg/day	0.006 kg/day
October (month)	Iron	0.41 kg/day	0.42 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

As noted in a previous report letter (No. 85-13), hexavalent chromium and iron loadings measured at sampling location 001B & 001C exceeded the NPDES daily maximum limits for each parameter. These exceedances, combined with continued rainfall and increased clearwell pumping during the month, led to violations of the daily average limits for iron and hexavalent chromium. Reduced Clearwell pumping, when possible, should lessen these loadings.

Sincerely yours,

Original (signed)

R. M. SPENCELEY

Manager

R. M. Spenceley

Manager

DLJ/vvs

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
 U. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner

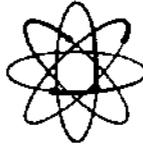
Central Files

1115280

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 613-738-8200

NOV 18 1985

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-16

Location (Name and Number): Combined General Sump & Clearwell - 001B & 001C

Date	Parameter	Permit Limit	Actual Measurement
November 12, 1985	Copper	0.051 kg/day	0.088 kg/day
November 12, 1985	Hexavalent chromium	0.008 kg/day	0.051 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to excessive rainfall during the first two weeks of November, 1985, increased pumping of the Clearwell (953,500 gallons) was required on November 12, 1985, resulting in elevated values for copper and hexavalent chromium loadings at the 001C sampling location. Completion of the bio-denitrification surge lagoon construction will increase operational flexibility regarding the 001C flow. Presently, a reduction of Clearwell pumping is implemented whenever possible.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

R. M. <sup>Manager</sup>Spenceley  
Manager

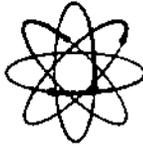
DLJ/vvs

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
✓ D. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner  
Central Files

1115281

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-8200

NOV 18 1985

J. A. Reafsnyder  
Site Manager  
Department of Energy  
P. O. Box 39158  
Cincinnati, OH 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-17

Outfall (Names and Number): Storm Sewer Outfall - 002

<u>Date:</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
November 11, 1985	Total Suspended Solids	100 mg/L	175 mg/L

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to excessive precipitation and increased construction activities during early November, 1985, an elevated concentration of suspended solids was evidenced at the Storm Sewer Outfall sampling location (002) on Nov. 11, 1985 as noted above. Completion of the stormwater retention basin construction should lower total suspended solids concentrations prior to discharge.

Sincerely yours,  
Original Signed by  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/psg

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
✓ D. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner  
Central Files

1115262



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

September 30, 1985

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are reports documenting two NPDES noncompliances DOE/ORO received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. J. Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

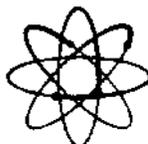
Enclosures:  
Two Reports

cc w/encls:  
D. R. Sheppard, PE-24, GTN  
J. A. Reafsnyder, DP-84  
→ J. K. Alexander, SE-331 (2)

1115283

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

SEP 5 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-11

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
August 22, 1985	Hexavalent Chromium	0.008 kg/day	0.014 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

An excessive concentration of 0.015 mg/L hexavalent chromium was evidenced at the Clearwell sampling location on August 22, 1985. Combined with an above-average flow of 0.239 mgd from the Clearwell, a loading of 0.014 kg/day was present at the 001B & 001C sampling location, which violates the 0.008 kg/day limit. Corrective actions could entail the reduction of Clearwell pumping, if possible.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

Manager  
R. M. Spenceley  
Manager

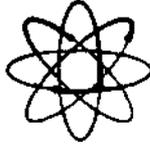
DLJ/vvs

cc: R. H. Cross  
✓ B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner  
D. G. Howell  
Central Files

1115284

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-6200

SEP 10 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-12

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & 001C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
August, 1985	Hexavalent Chromium	0.004 kg/day	0.007 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Due to the excessive hexavalent chromium loading evidenced at the Combined General Sump Clearwell location (0.014 kg/day) on August 22, 1985 (as shown in Report No. 85-11), the daily average limit for hexavalent chromium was exceeded for the month of August as noted above. This violation can be attributed to excessive flow from the Clearwell, and a reduction of this flow as well as sitewide sump operations will lessen the hexavalent chromium loadings at the sampling location.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/vvs

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. G. Howell  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner

Central Files

1115285



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

September 17, 1985

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are reports documenting two NPDES noncompliances DOE/ORO received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script that reads "B. J. Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

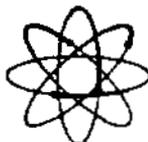
Enclosures:  
Two Reports

cc w/encls:  
D. R. Sheppard, PE-24, GTN  
J. A. Reafsnyder, DP-84  
J. K. Alexander, SE-331 (2)

1115286

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513 - 738 - 8200

AUG 16 1985

Mr. J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-9

Outfall (Name and Number): Combined General Sump & Clearwell, 001 B & C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
July, 1985	Hexavalent Chromium	0.004 kg/day	0.005 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

An excessive concentration of hexavalent chromium evidenced at the Clearwell/Sump location on July 10, 1985 (0.011 kg/day as noted in Report No. 85-8) resulted in a violation of the monthly limit in hexavalent chromium at the same location as shown above. Increased pumping of filtrates from sitewide operations to the pits resulted in the elevated concentration of hexavalent chromium in the pit water (Clearwell sampling location). A reduction of Clearwell pumping, if possible, would lower the chromium loadings (kg/day) at the sampling location.

Sincerely yours,  
Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/vws

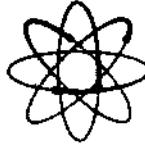
cc: R. H. Cross  
✓ B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner  
Central Files

A PRIME CONTRACTOR FOR THE DEPARTMENT OF ENERGY

1115281

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

AUG 16 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-10

Outfall (Name and Number): Combined General Sump & Clearwell - 001B & C

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
July, 1985	Total Suspended Solids (daily average)	6.2 kg/day	6.5 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Although no daily maximum limits were exceeded for total suspended solids loadings at sampling locations 001B & C during the month of July, the daily average limit (6.2 kg/day) was exceeded for the month due to excessive pumping of pit water to the Clearwell along with above-average precipitation and respective surface runoff. A decrease in the pumping of pit water may alleviate this problem.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

Manager  
R. M. Spenceley  
Manager

DLJ/vvs

cc: R. H. Cross  
✓ B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
R. B. Weidner

Central Files

A PRIME CONTRACTOR FOR THE DEPARTMENT OF ENERGY

1115288



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

August 26, 1985

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed is a report documenting one NPDES noncompliance DOE/ORO received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

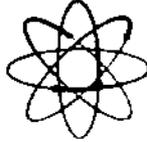
Enclosures:  
One Report

cc w/encs:  
D. R. Sheppard, PE-24, GTM  
J. A. Reafsnyder, DP-84  
→ J. K. Alexander, SE-331 (2)

1115289

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE AREA CODE 513-738-8200

AUG 5 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580: REPORT NO. 85-8

Outfall (Name and Number): 001B & C, Combined General Sump & Clearwell

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
July 10, 1985	Hexavalent Chromium	0.008 kg/day	0.011 kg/day

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Increased pumping of filtrates from sitewide operations to the pits has resulted in an elevated hexavalent chromium concentration in the pit water (Clearwell location). A reduction of Clearwell pumping, if possible, would lower chromium loadings at the sampling location.

Sincerely yours,  
Original Signed By  
R. M. SPENCELEY,  
Manager

R. M. Spenceley  
Manager

DLJ/vws

cc: R. H. Cross  
B. J. Davis  
D. A. Fleming  
✓ D. B. Howard  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
J. A. Reafsnyder  
R. B. Weidner

Central Files

1115290



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

April 30, 1985

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed is an NPDES noncompliance report DOE/ORO has received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

*James K. Alexander*

*for*

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331: Alexander

Enclosures:  
One Report

cc w/encls:  
V. Brinker, OH EPA  
D. E. Patterson, EP-32, GTN  
→ J. K. Alexander, SE-331

1115291





**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

March 29, 1985

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are five NPDES noncompliance reports DOE/ORO has received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

*James K Alexander*

for Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

Enclosures:  
Four Reports

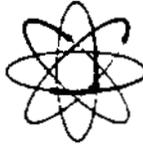
cc w/encls:  
V. Brinker, OH EPA  
D. E. Patterson, EP-32, GTN  
→ J. K. Alexander, SE-331

1115293

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE 513-738-6200

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR JANUARY, 1985

The following NPDES violation was recorded on January 23, 1985:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001A, Sewage Treatment Plant	Weekly grab sample	BOD, 5-day; daily maximum: 10.0 kg/day	20.3 kg/day

Due to extreme cold weather, a reduction in trickling filter capacity occurred at the Sewage Treatment Plant. One of the two trickling filters was out of service during the period from 1/19 to 1/28/85. This, combined with increased flows and decreased biological activity during cold weather resulted in a BOD, 5-day violation of the load limit of 10.0 kg/day on January 23, 1985, the scheduled weekly sampling day. The BOD concentration (26.7 mg/L) was still well within the NPDES permit concentration limit of 40 mg/L.

The above violation was reported by phone to DOE Oak Ridge Safety & Environmental Control Division on January 30, 1985.

Sincerely yours,

R. M. Spenceley  
Manager

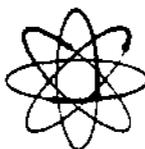
DLJ:DAF/vvs

cc: M. W. Boback  
B. J. Davis  
J. Farr  
D. B. Howard  
N. R. Leist  
E. M. Nutter  
M. R. Theisen (2)  
R. B. Weidner  
Central Files

1115294

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-730-8200

Mr. M. R. Theisen, Director  
Weapons Division  
Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, TN 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580 FOR  
JANUARY 1985

The following NPDES violations were recorded for the month of  
January 1985:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001A, Sewage Treatment Plant	Flow-weighted average of weekly 24-hour composites for January	5-day BOD; daily average: 5.0 Kg/day	7.8 Kg/day
001B and 001C General Sump & Clearwell, Combined	Flow-weighted average of weekly 24-hour composites for January	Hexavalent chromium; daily average: 0.004 Kg/day	0.005 Kg/day

Due to the extreme cold weather in January, one stage of a two-stage trickling filter was not operational for several days, thereby lowering the biological efficiency of the treatment process which resulted in a higher 5-day BOD average for the month.

In addition, pumping of filtrate from sitewide operations to the waste pits has resulted in elevated hexavalent chromium concentrations in pit water. The increased pumping of the pit Clearwell caused the load limit for hexavalent chromium to be exceeded on the average for the month of January, 1985.

1115295

Mr. M. R. Theisen

Page 2

These two violations were reported by phone to DOE Oak Ridge Safety & Environmental Control Division on February 8, 1985.

Sincerely,

R. M. Spenceley  
Manager

DLJ/jjc

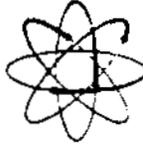
cc: M. W. Boback  
✓ B. J. Davis - ORO  
J. Farr  
D. B. Howard  
N. R. Leist  
E. M. Nutter  
M. R. Theisen (2)  
R. B. Weidner

Central Files

1115296

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

**FEB 26 1985**

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR FEBRUARY, 1985

The following NPDES violation was recorded during the month of February, 1985:

<u>Outfall Number and Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001: Manhole-175	weekly grab sample collected 2/11/85	Oil & grease daily maximum 15 mg/L	19 mg/L

Rainfall prior to the scheduled collection of the NPDES sample resulted in the flow of storm water runoff from the project area into the FMPC storm sewer system. Traces of oil and grease from pads and roadways was washed into the storm water system, eventually reaching Manhole-175. Residual material from a fuel oil spill which occurred on 2/4/85 and which was subsequently cleaned up may have contributed to the violation.

This violation was reported by phone to DOE Oak Ridge Safety & Environmental Control Division on February 12, 1985.

Sincerely yours,  
Original Signed By  
**R. M. SPENCELEY**  
Manager

R. M. Spenceley  
Manager

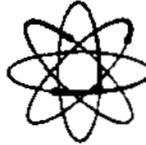
DAF/vvs

cc: M. W. Boback  
B. J. Davis  
J. Farr - L. Pennington  
✓ D. B. Howard  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner - D. A. Fleming

1115297

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

MAR 20 1985

J. A. Reafsnyder  
Site Manager  
U.S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580; REPORT NO. 85-5

Outfall: 001B and 001C - Combined General Sump and Clearwell

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
February, 1985	hexavalent chromium	0.004 kg/d (daily average)	0.007 kg/d

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

Increased pumping of filtrates from sitewide operations to the pits has resulted in elevated hexavalent chromium concentration in the pit water (Clearwell location). A reduction of Clearwell pumping, if possible, would lower chromium loadings at the sampling location.

Sincerely yours,  
Original  
R. M. SPENCELY  
Manager  
R. M. Spencely  
Manager

DLJ/vvs

CC: ✓ B. J. Davis  
D. A. Fleming  
D. B. Howard  
D. L. Jones  
N. R. Leist  
E. M. Nutter  
L. Pennington  
J. A. Reafsnyder  
R. B. Weidner

Central Files

1115298



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

January 30, 1985

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

**NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580**

Enclosed are four NPDES noncompliance reports DOE/ORO has received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Mike A. Travaglini of my staff at (FTS) 626-0848.

Sincerely,

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:Travaglini

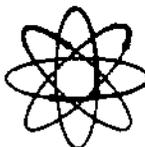
Enclosures:  
As stated

cc w/encs:  
V. Brinker, OH EPA  
D. E. Patterson, EP-32, GTN  
→ M. A. Travaglini, SE-331

1115299

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 613-736-6200

JAN 16 1985

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR DECEMBER, 1984

The following NPDES violations were recorded for the month of December, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001B and 001C, General Sump and Clearwell, combined	flow-weighted average of weekly 24-hour composites for December	hexavalent chromium; daily average 0.004 kg/day	0.008 kg/day
001B and 001C, General Sump and Clearwell, combined	flow-weighted average of weekly 24-hour composites for December	copper, total; daily average: 0.025 kg/day	0.031 kg/day

Pumping of filtrates from sitewide operations to the pits has resulted in elevated copper and hexavalent chromium concentrations in the pit water. Pit clearwell pumping requirements imposed by seasonal increases in precipitation caused the aforementioned copper and hexavalent chromium load limits to be exceeded during the month of December.

These two violations were reported by phone to DOE Oak Ridge Safety & Environmental Control Division on January 9, 1985.

Sincerely yours,

Original Signed By:  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/vvs

1115300

M. R. Theisen, Director  
Weapons Division

Page 2

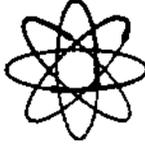
cc: M. W. Boback  
✓ B. J. Davis  
J. Farr  
D. B. Howard  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

Central Files

1115301

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-6200

JAN 1985

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR DECEMBER, 1984

The following NPDES violation was recorded on December 22, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
002, Storm Sewer Outfall	Grab sample taken on December 22, 1984	Oil & grease, daily maximum: 15 mg/L	17 mg/L

Above average stormwater runoff due to heavy precipitation on December 22, 1984, caused the aforementioned violation for oil and grease at the storm sewer outfall.

This violation was reported by phone to DOE Oak Ridge Safety & Environmental Control Division on December 27, 1984.

Sincerely yours,

*[Signature]*  
Manager

R. M. Spenceley  
Manager

DLJ/vvs

cc: M. W. Boback  
B. J. Davis  
J. Farr  
✓ D. B. Howard  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

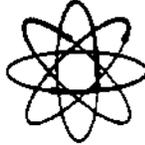
Central Files

A PRIME CONTRACTOR FOR THE DEPARTMENT OF ENERGY

1115302

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-6200

JAN 4 1985

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P.O. Box E  
Oak Ridge, TN 37831

Dear Mr. Theisen:

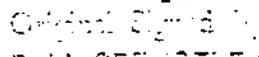
REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580 FOR  
DECEMBER 1984

The following NPDES violation was recorded on December 19, 1984:

<u>Outfall Number and Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001B and 001C, General Sump and Clearwell, Combined	Flow-weighted average of weekly 24-hour composites for December	Hexavalent chromium, daily maxi- mum: 0.008 kg/day	0.009 kg/day

Pit clearwell pumping requirements imposed by seasonal increases in precipitation caused the hexavalent chromium limit to be slightly exceeded on December 19, 1984.

The aforementioned occurrence was reported by phone to DOE Oak Ridge Safety & Environmental Control Division on December 20, 1984.

Sincerely,  
  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/jjc

cc: M. W. Boback  
B. J. Davis  
J. Farr  
D. B. Howard ✓  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen (2)  
R. B. Weidner  
Central Files



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

December 31, 1984

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are three NPDES noncompliance reports DOE/ORO received recently from NLO, Inc., ORO's management contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Mike A. Travaglino of my staff at (FTS) 626-0848.

Sincerely,

**ORIGINAL SIGNED BY**  
STAN S. STIEF

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:Travaglino

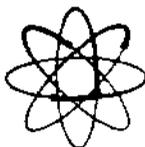
Enclosures:  
Ltr dtd 12/13/84

cc w/encls:  
V. Brinker, OH EPA  
D. E. Patterson, PE-24, GTN  
→ M. A. Travaglino, SE-331

1115304

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-6200

DEC 13 1984

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR NOVEMBER, 1984

The following NPDES violation was recorded during November, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001B and 001C, General Sump & Clearwell, combined	flow-weighted average of weekly 24-hour composites for November	Residue, Total nonfilterable, daily average = 6.2 kg/day	6.9 kg/day
001B and 001C, combined	flow-weighted average of weekly 24-hour composites for November	Copper, Total daily average = 0.025 kg/day	0.026 kg/day
001B and 001C, combined	flow-weighted average of weekly 24-hour composites for November	Copper, Total daily maximum: 0.051 kg/day	0.079 kg/day

Pumping of filtrates from sitewide operations to the pits has resulted in elevated copper and suspended solids concentrations in the pit water. Pit clearwell pumping requirements imposed by seasonal increases in precipitation caused the aforementioned solids and copper load limits to be exceeded during the month of November.

1115305

These occurrences were reported by phone to DOE Oak Ridge Safety & Environmental Control Division on December 7, 1984.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/vvs

cc: M. W. Boback  
B. J. Davis  
J. Farr  
D. B. Howard  
✓ P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2x  
R. B. Weidner

Central Files

1115306

December 3, 1984

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed is one NPDES noncompliance report DOE/ORO received recently from NLO, Inc., ORO's management contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Mike A. Travaglini of my staff at (FTS) 626-0848.

Sincerely,

ORIGINAL SIGNED BY

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:Travaglini

Enclosures:  
As stated

cc w/encls:  
V. Brinker, OH EPA  
D. E. Patterson, PE-24, GTN  
M. A. Travaglini, SE-331

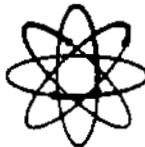
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1115307

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

NOV 8 1984

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR OCTOBER, 1984

The following NPDES violation was recorded during October, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
001B & 001C, General Sump and Clearwell, combined	Flow-weighted average of weekly 24-hr. composites for October	hexavalent chromium, daily average: 0.004 kg/d	0.006 kg/d

Pumping of Refinery filtrate and effluents from other sitewide operations to the pits has resulted in elevated hexavalent chromium concentrations in pit water. The pit Clearwell pumping requirements imposed by increased precipitation during the month of October have caused the daily average load limit for hexavalent chromium to be exceeded.

This occurrence was reported by phone to the DOE Oak Ridge Safety & Environmental Control Division on November 7, 1984.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY,

Manager  
R. M. Spenceley  
Manager

DLJ/vvs

cc: M. W. Boback  
B. J. Davis  
J. Farr  
D. B. Howard  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2x  
R. B. Weidner  
Central Files

1115308



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

July 17, 1985

Ms. Valerie Brinker  
Industrial Wastewater Group  
Ohio Environmental Protection Agency  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

Dear Ms. Brinker:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed is a report documenting one NPDES noncompliance DOE/ORO received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Jake Alexander of my staff at (FTS) 626-0850.

Sincerely,

A handwritten signature in cursive script that reads "B. J. Davis".

Bobby Joe Davis, Chief  
Environmental Protection Branch  
Environment, Safety, and Health Division

SE-331:Alexander

Enclosures:  
One Report

cc w/encls:

D. R. Sheppard, EP-24, GTN

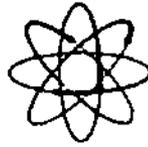
J. A. Reafsnyder, OP-84

→ J. K. Alexander, SE-331 (2)

1115309

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513 - 736 - 6200

JUN 18 1985

J. A. Reafsnyder  
Site Manager  
U. S. Department of Energy  
P. O. Box 39158  
Cincinnati, Ohio 45239

Dear Mr. Reafsnyder:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 009580: REPORT NO. 85-7

Outfall (Name and Number): 002 - Storm Sewer Outfall

<u>Date</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
May 15, 1985	Total Suspended Solids(daily max.)	100 mg/l	112 mg/l

Reason for Noncompliance, Planned Corrective Measures, and Other Pertinent Information:

The elevated concentration of suspended solids evidenced at the storm sewer outfall on May 15th was primarily due to increased runoff from site-wide construction areas and drainage surfaces subsequent to a heavy rainfall.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DLJ/ch

CC: R. H. Cross                      D. L. Jones                      J. A. Reafsnyder  
     B. J. Davis                        N. R. Leist                      R. B. Weidner  
     D. A. Fleming                      E. M. Nutter                    Central Files  
     ✓ D. B. Howard                    L. Pennington

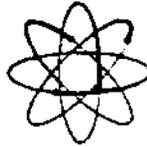
1115310



# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

AUG 24 1984

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR JULY, 1984

The following NPDES violations were recorded during July, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
1) 001B & 001C; General Sump & Clearwell combined	24-hr. composite; 7/6/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.013 kg/d
2) 001B & 001C; General Sump & Clearwell combined	24-hr. composite; 7/9/84	Copper, daily maximum: 0.051 kg/d	0.052 kg/d
3) 001B & 001C; General Sump & Clearwell combined	24-hr. composite; 7/25/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.010 kg/d
4) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of weekly 24-hr. composites for July	hexavalent chromium, daily average: 0.004 kg/d	0.008 kg/d
5) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of weekly 24-hr. composites for July	copper, daily average: 0.025 kg/d	0.029 kg/d

1115312

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
6) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of 24-hr. com- posites for July	suspended solids, daily average: 6.2 kg/d	7.6 kg/d

Pumping of Refinery filtrate and effluents from other sitewide operations to the pits has resulted in elevated hexavalent chromium and copper concentrations in pit water. The pit Clearwell pumping requirements imposed by seasonal increases in precipitation caused the load limits for hexavalent chromium and copper to be exceeded in five occurrences during July. Precipitation and algae growth in the Clearwell contributed to the elevated levels of suspended solids.

These occurrences were reported by phone to the DOE Oak Ridge Safety & Environmental Control Division on August 6, 1984.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

Manager  
R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
J. Farr  
✓D. B. Howard  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner  
B. J. Davis  
Central Files

1115313



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

August 1, 1984

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

NPDES NONCOMPLIANCES: FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are two NPDES noncompliance reports DOE/ORO received recently from NLO, Inc., ORO's management contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these noncompliances, please contact Mike A. Travaglini of my staff at (FTS) 626-0848.

Sincerely,

A handwritten signature in cursive script that reads "B. J. Davis".

Bobby Joe Davis, Acting Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:Travaglini

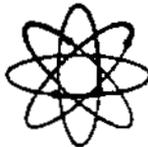
Enclosures:  
As stated

cc w/encls:  
V. Brinker, OH EPA  
D. E. Patterson, PE-24, GTN

1115314

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

JUN 15 1984

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR JUNE, 1984

Outfall number and name: Discharge points 001B and 001C, General Sump and  
Clearwell combined

Sample type: 24-hour composite collected 6/1/84

Permit discharge limit: hexavalent chromium daily maximum: 0.008 kg/day

Actual discharge measurement: 0.009 kg/day

Remarks: This hexavalent chromium violation was caused by the pumping  
requirements imposed on the pit Clearwell by above-average  
precipitation.

This occurrence was reported by phone on June 14, 1984, to the DOE Oak  
Ridge Safety & Environmental Control Division.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

Manager  
R. M. Spenceley  
Manager

DAF/vvs

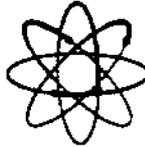
cc: M. W. Boback  
J. Farr  
W. A. Johnson  
P. W. Kaspar✓  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

Central Files

1115315

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

JUL 11 1984

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P.O. Box E  
Oak Ridge, TN 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR JUNE, 1984

Outfall number and name: Discharge points 001B and 001C, General Sump and  
Clearwell combined

Sample type: flow-weighted average of weekly 24-hour composites for  
June, 1984

Permit discharge limit: hexavalent chromium daily average 0.004 kg/day  
Actual discharge measurement: 0.005 kg/day

Remarks: This hexavalent chromium violation was caused by the pumping  
requirements imposed on the pit Clearwell by above-average  
precipitation

This occurrence was reported by phone on July 6, 1984, to the DOE Oak  
Ridge Safety & Environmental Control Division.

Sincerely,  
Original Signed By  
W. J. ADAMS  
Assistant Manager  
for R. M. Spenceley  
Manager

DAF/jjc

cc: M. W. Boback  
J. Farr  
✓ W. A. Johnson  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

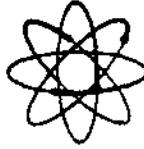
Central Files



# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

JUN 11 1984

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR MAY, 1984

The following NPDES violations were recorded during May, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
1) 001B & 001C; General Sump & Clearwell combined	24-hr. com- posite; 5/17/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.010 kg/d
2) 001B & 001C; General Sump & Clearwell combined	24-hr. com- posite; 5/24/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.011 kg/d
3) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of weekly 24-hr. composites for May	hexavalent chromium, daily average: 0.004 kg/d	0.008 kg/d
4) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of weekly 24-hr. composites for May	copper, daily average: 0.025 kg/d	0.030 kg/d

1115318

Pumping of Refinery filtrate and effluents from other sitewide operations to the pits has resulted in elevated hexavalent chromium and copper concentrations in pit water. The pit Clearwell pumping requirements imposed by seasonal increases in precipitation caused the load limits for hexavalent chromium and copper to be exceeded in four occurrences during May.

These occurrences were reported by phone to the DOE Oak Ridge Safety & Environmental Control Division on May 6, 1984.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DAF/vvs

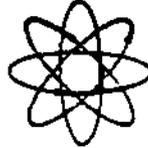
cc: M. W. Boback  
J. Farr  
W. A. Johnson  
✓ P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

Central Files

1115319

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

JUN 15 1984

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR JUNE, 1984

Outfall number and name: Discharge points 001B and 001C, General Sump and  
Clearwell combined

Sample type: 24-hour composite collected 6/1/84

Permit discharge limit: hexavalent chromium daily maximum: 0.008 kg/day

Actual discharge measurement: 0.009 kg/day

Remarks: This hexavalent chromium violation was caused by the pumping  
requirements imposed on the pit Clearwell by above-average  
precipitation.

This occurrence was reported by phone on June 14, 1984, to the DOE Oak  
Ridge Safety & Environmental Control Division.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY,

Manager  
R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
J. Farr  
W. A. Johnson ✓  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

Central Files

1115320



**Department of Energy**

Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37831

May 24, 1984

Technical Records  
Ohio Environmental Protection Agency  
361 East Broad Street  
Post Office Box 1049  
Columbus, Ohio 43216

Gentlemen:

NPDES VIOLATIONS: DOE'S FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Enclosed are 7 NPDES noncompliance reports DOE/ORO has received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these violations, please contact Mike A. Travaglini of my staff at (FTS) 626-0848.

Sincerely,

*Robert C. Sleeman*

*for*

Bobby Joe Davis, Acting Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:Travaglini

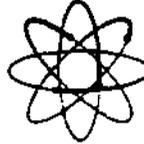
Enclosures:  
As stated

cc w/encls:  
V. Brinker, OH EPA  
D. E. Patterson, EP-32, GTN

1115321

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

MAY 14 1984

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580 FOR APRIL, 1984

The following NPDES violations were recorded during April, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
1) 001 Total Discharge; Manhole-175	flow-weighted average of weekly 24-hr composites for April	nitrate-nitrogen daily average: 1590 kg/d	1641 kg/d
2) 001B & 001C; General Sump & Clearwell Combined	24-hr. composite; 4/3/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.009 kg/d
3) 001B & 001C; General Sump & Clearwell Combined	24-hr. composite 4/27/84	suspended solids, daily maximum: 12.8 kg/d	17.8 kg/d
4) 001B & 001C; General Sump & Clearwell Combined	flow-weighted average of weekly 24-hr. composites for April	suspended solids, daily average: 6.2 kg/d	9.6 kg/d
5) 001B & 001C; General Sump & Clearwell Combined	flow-weighted average of weekly 24-hr. composites for April	hexavalent chromium, daily average: 0.004 kg/d	0.006 kg/d

1115322

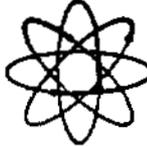
M. R. Theisen, Director  
Weapons Division

Page 2



# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-8200

MAR 28 1984

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580 FOR FEBRUARY, 1984

Outfall number and name:	Discharge points 001B and 001C, General Sump and Clearwell combined
Sample type:	flow-weighted average of weekly 24-hr composites for February
Permit discharge limit:	copper daily average, 0.025 kg/d
Actual discharge measurement:	0.029 kg/d

Remarks: This copper violation was caused by flows of Clearwell effluent with elevated copper concentrations resulting from increased pumpings of Refinery filtrates. The specification for copper in Refinery filtrate for discharge has been adjusted in an effort to minimize future occurrences.

This occurrence was reported by phone on March 7, 1984 to the DOE Oak Ridge Safety and Environmental Control Division.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DAF/vvs

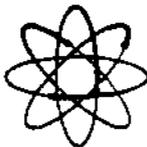
cc: M. W. Boback  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
✓ W. A. Johnson  
R. B. Weidner

Central Files

1115325

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-6200

APR 11 1984

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH0009580 FOR MARCH, 1984

The following NPDES violations were recorded during March, 1984:

<u>Outfall Number &amp; Name</u>	<u>Sample Type</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
1) 001B & 001C; General Sump & Clearwell combined	24-hr. composite; 3/23/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.012 kg/d
2) 001B & 001C; General Sump & Clearwell combined	24-hr. composite; 3/23/84	copper, daily maximum: 0.051 kg/d	0.104 kg/d
3) 001B & 001C; General Sump & Clearwell combined	24-hr. composite; 3/26/84	hexavalent chromium, daily maximum: 0.008 kg/d	0.009 kg/d
4) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of weekly 24-hr. composites for March	hexavalent chromium, daily average: 0.004 kg/d	0.007 kg/d
5) 001B & 001C; General Sump & Clearwell combined	flow-weighted average of weekly 24-hr. composites for March	copper, daily average: 0.025 kg/d	0.045 kg/d

119/

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APR 13 1984

Pumping of Refinery filtrate and effluents from other sitewide operations to the pits has resulted in elevated hexavalent chromium and copper concentrations in pit water. The pit Clearwell pumping requirements imposed by seasonal increases in precipitation caused the load limits for hexavalent chromium and copper to be exceeded in five occurrences during March.

These occurrences were reported by phone to the DOE Oak Ridge Safety & Environmental Control Division on March 6, 1984.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY,  
Manager  
R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
J. Farr  
W. A. Johnson  
P. W. Kaspar  
N. R. Leist  
E. M. Nutter  
M. R. Theisen - 2  
R. B. Weidner

Central Files

1115327



**Department of Energy**

Oak Ridge Operations

P. O. Box E

Oak Ridge, Tennessee 37831

February 10, 1984

U.S. Environmental Protection Agency  
Region V  
ATTN: Ms. Mariann Baumgartner  
Enforcement Division  
230 South Dearborn Street, 13th Floor  
Chicago, Illinois 60604

Gentlemen:

NPDES VIOLATIONS: DOE'S FEED MATERIALS PRODUCTION CENTER, PERMIT NO.  
OH0009580

Enclosed are 7 NPDES noncompliance reports DOE/ORO has received recently from NLO, Inc., ORO's Management Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these violations, please contact Mike A. Travaglini of my staff at (FTS) 626-0848.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bobby Joe Davis".

Bobby Joe Davis, Acting Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:Travaglini

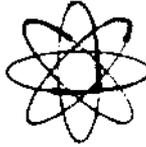
Enclosures:  
As stated

cc w/encls:  
C. Cooperrider, OH EPA  
D. E. Patterson, EP-32, GTN

1115328

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE AREA CODE 513-738-6200

: 1984

M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

One violation of the FMPC NPDES discharge permit was recorded during December, 1983, and one violation has been recorded thus far during January, 1984.

December, 1983:

Outfall number and name: discharge point 001B (General Sump) and 001C (Clearwell) combined

Sample type: average of composite samples collected for December, 1983

Permit discharge limit: hexavalent chromium daily average, 0.004 kg/d

Actual discharge measurement: hexavalent chromium daily average, 0.005 kg/d.

January, 1984:

Outfall number and name: discharge point 001 Total Discharge, MH-175

Sample type and date: 24-hour composite sample, 1/5/84

Permit discharge limit: Ammonia (N) daily maximum, 43 kg/d

Actual discharge measurement: Ammonia (N) daily maximum, 48 kg/d.

Remarks: The hexavalent chromium average limit violation was due to the pumping requirements at the General Sump and Clearwell. The five samples collected for December ranged from 0.0035 kg Cr<sup>+6</sup>/d to 0.008 kg Cr<sup>+6</sup>/d. Thus, while no violations of the daily maximum limit (0.008 kg Cr<sup>+6</sup>/d) occurred, the average limit was exceeded. The ammonia (N) violation of 1/5/84 occurred when the ammonia stripper was out of service for repairs.

1115329

M. R. Theisen, Director  
Weapons Division

Page 2

These occurrences were reported by phone on January 11, 1984, to the DOE Oak Ridge Safety and Environmental Control Division.

Sincerely yours,

Original Signed By

R. M. Spenceley  
Manager

DAF/vvs

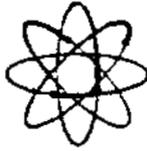
cc: M. W. Boback  
J. Farr  
W. C. Hill  
P. W. Kaspar  
E. M. Nutter  
M. R. Theisen - 2  
W. H. Travis  
R. B. Weidner

Central Files

1115330

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE 513-738-6200

1983

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. 0009580 FOR NOVEMBER, 1983

Outfall number and name: discharge point 001D, Storm Sewer Lift Station

Sample type: flow weighted average of grab samples collected for November

Permit discharge limit: suspended solids daily average, 30 mg/L

Actual discharge measurement: 35 mg/L

Remarks: This suspended solids violation was caused by the washing of solids into the storm sewer by rainfall at sitewide sources, including newly seeded areas and other areas with maintenance or construction activities in progress. The November daily average concentration of suspended solids at the final discharge point, 001 (Manhole-175), was well below the permit limit.

This occurrence was reported by phone on December 8, 1983 to the DOE Oak Ridge Safety and Environmental Control Division.

Sincerely yours,  
Original Signed By  
R. M. SPENCELEY  
Manager  
R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
P. W. Kaspar  
W. C. Hill  
E. M. Nutter  
M. R. Theisen - 2  
W. H. Travis  
R. B. Weidner

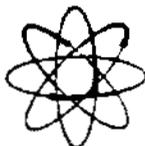
Central Files

A PRIME CONTRACTOR FOR THE DEPARTMENT OF ENERGY

1115331

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE AREA CODE: 513-738-6200

DEC 14 1983

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37831

Dear Mr. Theisen:

## REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. 0009580

The following NPDES violations were recorded during October, 1983:

<u>Outfall Number and Name</u>	<u>Sample Type and Date</u>	<u>Permit Limit</u>	<u>Actual Measurement</u>
1) 001 Total Discharge; MH-175	24 hr. composite 10/22/83	Suspended Solids Daily max: 60 mg/L	306 mg/L
2) 001B & 001C; General Sump & Clearwell combined	24 hr. composite 10/22/83	Hexavalent Chromium Daily max: 0.008 kg/d	0.010 kg/d
3) 001B & 001C; General Sump & Clearwell combined	24 hr. composite 10/30/83	Hexavalent Chromium Daily max: 0.008 kg/d	0.013 kg/d
4) 001B & 001C; General Sump & Clearwell combined	flow weighted average of weekly composites	Hexavalent Chromium Daily avg: 0.004 kg/d	0.008 kg/d

Remarks: The occurrences involving hexavalent chromium at the combined General Sump and Clearwell were due to the pumping requirements imposed by heavy rainfall (7.34 inches during October) at the Clearwell. The occurrence involving suspended solids at Manhole-175 was related to the heavy loading of solids washed into the storm sewer system during heavy rainfall from sitewide sources, including newly seeded areas, and was related to a buried water line break which washed soil into the storm sewer system.

Occurrences 1) and 2) were reported by phone to the DOE Oak Ridge Safety & Environmental Control Division on October 28, 1983 and occurrences 3) and 4) were reported by phone on November 14, 1983.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

Manager  
R. M. Spenceley  
Manager

DAF/vvs

1115332

Mr. M. R. Theisen, Director

Page 2

cc: M. W. Eoback  
W. C. Hill  
P. W. Kaspar  
E. M. Nutter  
M. R. Theisen - 2  
W. H. Travis  
R. B. Weidner

Central Files

1115333



**Department of Energy**

Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37831

**SEP 14 1983**

U.S. Environmental Protection Agency  
Region V  
ATTN: Ms. Mariann Baumgartner  
Enforcement Division  
230 South Dearborn Street, 13th Floor  
Chicago, Illinois 60604

Gentlemen:

NPDES VIOLATIONS: DOE'S FEED MATERIALS PRODUCTION CENTER, PERMIT NO.  
OH0009580

Enclosed are 2 NPDES noncompliance reports DOE/ORO has received recently from NLO, Inc., ORO's Operating Contractor at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding these violations, please contact Mike A. Travaglini of my staff at (FTS) 626-0848.

Sincerely,

ORIGINAL SIGNED BY

*R.C. Sleeman*

Stan S. Stief, Acting Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

SE-331:MAT

Enclosures:  
As stated

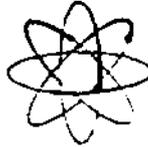
cc w/encls:  
C. Cooperrider, OH EPA  
D. E. Patterson, EP-32, GTN

1115334

*MAT*

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39156

CINCINNATI, OHIO 45239

PHONE: AREA CODE 513-738-1151

JUN 8 1983

Mr. M. R. Theisen, Director  
Weapons Division  
Department of Energy  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. 0009580

Outfall number and name: Discharge Point 001, Total Discharge; MH-175

Sample type and date: Grab sample collected on 5/18/83

Permit discharge limit: Oil and grease daily maximum, 15 mg/L

Actual discharge measurement: 55 mg/L

Remarks: The probable source of this oil and grease violation was liquid being pumped from Tank 8 at the General Sump to MH-175 at the time the grab sample was being collected. The appearance of the liquid did not indicate that oil or grease was present; however, subsequent analysis of a sample from the same General Sump tank indicated the presence of material, apparently soluble in water, defined as oil and grease by the test procedure. It is probable that this source also caused a similar violation on 4/27/83 reported previously. Samples have been submitted for identification of the organic material(s) present. Proper treatment, handling, and routing of General Sump liquids will prevent future occurrences.

This occurrence was reported by phone on May 27, 1983 to the DOE Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

Original Signed By  
R. M. SPENCELEY

Manager  
R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
V. J. D'Amico  
W. C. Hill  
E. M. Nutter  
M. R. Theisen - 2  
✓W. H. Travis  
R. B. Weidner  
Central Files

PRIME CONTRACTOR FOR THE DEPARTMENT OF ENERGY

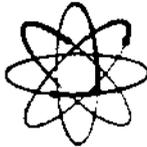
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JUN 10 1983

1115335

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAY 19 1983

Mr. M. R. Theisen, Director  
Weapons Division  
Department of Energy  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. 0009580

Outfall number and name: Discharge Point 001, Total Discharge, MH-175

Sample type and date: Grab sample collected on 4/27/83

Permit discharge limit: Oil and grease daily maximum, 15 mg/L

Actual discharge measurement: 20 mg/L

Remarks: The source of the oil and grease in this grab sample could not be identified. The result for the NPDES sample collected for oil and grease at the storm sewer lift station on this same date showed a concentration of <5 mg/L oil and grease. Analysis of the next MH-175 weekly grab sample for oil and grease collected on 5/4/83 was well within the NPDES permit limit.

This occurrence was reported by phone on May 6, 1983, to the DOE Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

Original Signed By  
**R. M. SPENCELEY,**  
Manager

R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
V. J. D'Amico  
W. C. Hill  
E. M. Nutter  
M. R. Theisen - 2  
✓ W. H. Travis  
R. B. Weidner

Central Files

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1115336



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

November 19, 1982

U.S. EPA Region V  
ATTN: Ms. Mariann Baumgartner  
Enforcement Division  
230 So. Dearborn St., 13th Fl.  
Chicago, IL 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS: DOE'S FEED MATERIALS PRODUCTION CENTER, PERMIT  
NO. OH0009580

Enclosed is an NPDES noncompliance report DOE-ORO received recently  
from NLO, Inc., ORO's Operating Contractor at the Feed Materials  
Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding  
the violation, please contact Mike Travaglini of my staff, FTS 626-0848.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety and Environmental  
Control Division

SE-331:MAT

Enclosure

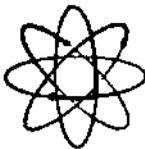
CC w/encl:  
Mr. Craig Cooperrider, OEPA/Dayton  
D. E. Patterson, EP-32, DOE/HQ GTN

1115337

MT

# NLO, Inc.

A SUBSIDIARY OF NL INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 15 1982

Mr. M. R. Theisen, Director  
Weapons Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Theisen:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: Discharge Point 001D, Storm Sewer Lift Station

Sample type and date: Grab sample collected on 9/29/82

Permit discharge limit: Oil and grease daily maximum, 15 mg/L

Actual discharge measurement: 47 mg/L

Remarks: On 9/29/82, when the analytical result was received, inspection revealed the presence of the oil, estimated at 20 to 30 gallons, in the wet well of the storm sewer lift station and it was immediately removed. Storm sewer lift station pumpings for 9/29/82 contained traces of this oil. While the NPDES limit was exceeded at 001D, the 9/29/82 result for oil and grease at 001 (Total Discharge at Manhole-175) was 5 mg/L, which is well within the limit of 15 mg/L. The 10/6/82 results for oil and grease at both 001D and 001 were <5 mg/L oil and grease, also well below the limit. The source of this oil could not be positively identified; however, efforts to do so are continuing.

This occurrence was reported by phone October 4, 1982, to the DOE Oak Ridge Safety & Environmental Control Division.

Sincerely yours,  
Original Signed By  
W. J. ADAMS  
Assistant Manager

*for* R. M. Spenceley  
Manager

DAF/vvs

cc: M. W. Boback  
V. J. D'Amico  
W. C. Hill  
E. M. Nutter  
M. R. Theisen - 2  
W. H. Travis  
R. B. Weidner

Central Files

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1115338



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

MAR 20 1981

U.S. EPA Region V  
ATTN: Ms. Mariann Baumgartner  
Enforcement Division  
230 South Dearborn St., 13th Fl.  
Chicago, IL 60604

Dear Ms. Baumgartner:

NPDES VIOLATION: DOE'S FEED MATERIALS PRODUCTION CENTER,  
PERMIT NO. OH0009580

Enclosed is a NPDES noncompliance report DOE-ORO received recently from the DOE Operating Contract at the Feed Materials Production Center in Fernald, Ohio.

If you have any questions or need any additional information regarding the violation, please contact Mike Travaglini of my staff, FTS 626-0848.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety and Environmental  
Control Division

SE-331:MAT

Enclosures

CC w/encls:  
C. Cooperrider, OEPA/Dayton

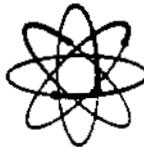
CC w/o encls:  
H. D. Hickman

1115339

MT

# NLO, Inc.

A SUBSIDIARY OF N.L. INDUSTRIES, INC.



P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 17 1981

Mr. H. D. Hickman, Assistant Manager  
for Defense Programs  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Hickman:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: Outfall 001, Manhole-175

Sampling time or period: Composite sample for the 24-hour period  
ending 8:00 AM, February 4, 1981

Permit discharge limit: Ammonia daily maximum, 43 kg/day

Actual discharge measurement: 59 kg/day

Remarks: Discharge from pit 5 was being carefully controlled to stay within the permit limit for copper. As a result of reduced discharge, a large volume of water accumulated in the pit and Clearwell. When the copper concentration dropped, pumping from the Clearwell was increased. A transient rise in the ammonia concentration occurred at that time.

This occurrence was reported by phone February 12, 1981, to the DOE Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
V. J. D'Amico  
R. C. Heatherton  
H. D. Hickman - 2  
W. C. Hill

Central Files

FEB 20 1981

1115340



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

APR 4 1980

U.S. EPA, Region V  
Enforcement Division  
ATTN: Ms. Mariann Baumgartner  
230 South Dearborn Street, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATION: DOE'S FEED MATERIALS PRODUCTION CENTER OH 0009580

Enclosed is an NPDES noncompliance report DOE-ORO has received recently from the National Lead Company of Ohio, ORO's Operating Contractor at the Feed Material Production Center.

If you have questions or need any additional information regarding this violation, please contact James K. Alexander of my staff, FTS 626-0849 or commercial, area code 615, 576-0849.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

MS-331:JKA

Enclosure

CC w/encl:

Craig Cooperrider, Ohio EPA, Dayton

**COPY**

1115341

*Jake*



cc: W. J. Adams  
M. W. Boback  
R. C. Heatherton  
H. D. Hickman - 2  
W. C. Hill

Central Files

1115343



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

January 9, 1980

Ms. Mariann Baumgartner  
U.S. EPA Region V  
Enforcement Division  
230 South Dearborn Street  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATION; DOE'S FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH 0009580

Enclosed is a noncompliance report DOE-ORO received in November from the operating contractor at the Feed Materials Production Center. We regret our delay in transmitting this violation report to Region V.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety and Environmental Control Division

MS-331:JKA

Enclosure:  
As stated

cc w/encl: Craig Cooperrider, OEPA/Dayton

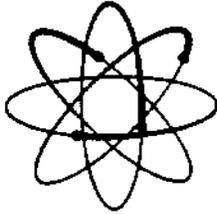
1115344

-JK-11

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

NOV 16 1979

Mr. H. D. Hickman, Director  
Manufacturing Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Hickman:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: Composite sample for the 24-hour period  
ending 8:00 AM, November 10, 1979

Permit discharge limit: Clearwell suspended solids daily maximum,  
40 mg/l

Actual discharge measurement: 76 mg/l

Remarks: The increased solids concentration was caused by precipitation run-off which washed soil into the Clearwell. At 8:00 AM on November 9, at the start of the sample collection period, the Clearwell water appeared normal. By 1:30 PM, heavy run-off draining into the Clearwell had produced cloudiness. Pumping from the Clearwell was immediately halted at that time. Total volume discharged between 8:00 AM and 1:30 PM was 22,000 gallons.

This occurrence was reported by phone on November 14, 1979, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

1115345

1455

Mr. H. D. Hickman, Director

Page 2

cc: W. J. Adams  
M. W. Boback  
R. C. Heatherton  
H. D. Hickman - 2  
W. C. Hill  
J. Farr  
Central Files

1115346



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

January 22, 1979

Ms. Mariann Baumgartner  
U.S. EPA Region V  
230 South Dearborn Street, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATION; FEED MATERIALS PRODUCTION CENTER, PERMIT  
NO. - OH0009580

Enclosed is a noncompliance report received recently from the National Lead Company of Ohio, DOE's operating contractor at the Fernald Plant (FMPC). This is only the second violation at this facility in the last six months. The total number of NPDES violations at the FMPC during 1978 was eleven. We believe this compares quite favorably to the 34 violations reported in 1977 and 70 in 1976.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch

MS-331:JKA

Enclosure

CC w/encl:  
Craig Cooperrider, Ohio-EPA, SE Distr.

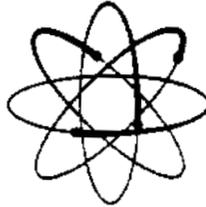
1115347

*False*

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 19 1978

Mr. H. D. Hickman, Director  
Manufacturing Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Hickman:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: December 6, 1978.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 9.6 mg/l.

Remarks: Coal pile drainage enters a sump from where it is pumped to the General Sump for treatment and proper disposal. The pumping cycle is controlled by a float switch which became defective, permitting the sump water to overflow to Manhole-175 via the storm sewer system. When discovered, immediate repair was ordered and the unit is now operating properly.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
R. C. Heatherton  
H. D. Hickman - 2  
W. C. Hill  
Central Files

1115348

1524  
DEC 19 1978



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

November 24, 1978

Ms. Mariann Baumgartner  
U.S. EPA, Region V  
Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS; FEED MATERIALS PRODUCTION CENTER, PERMIT NO. OH0009580

Please find attached one noncompliance report that DOE-ORO has received recently from the National Lead Company of Ohio, the Operating Contractor at the Fernald, Ohio plant.

If you believe you need any additional information, please contact me, or James Alexander of my staff, at FTS 850-4176.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch

OSE:JKA

Enclosure:  
Noncompl. Rpt. (1)

CC w/encl:  
Craig Cooperrider, Ohio EPA, Dayton

COPY.

1115349

Jake



July 28, 1978

Ms. Mariann Baumgartner  
U.S. EPA, Region V  
Enforcement Division  
230 South Dearborn Street, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATION, DOE's FEED MATERIALS PRODUCTION CENTER, FERNALD, OHIO  
PERMIT NO. OH0009580

Attached is a noncompliance report for a violation that occurred on  
June 26, 1978. If you have any questions or need further information,  
please contact Jake Alexander of my staff, FTS 850-4176.

Sincerely,  
Original Signed By  
J. F. Wing

J. F. Wing, Chief  
Environmental Protection Branch

OSE:JKA

Enclosure:  
As stated

CC w/enc1:

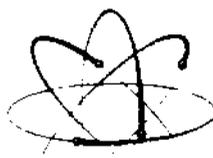
Craig Cooperrider  
Ohio EPA, Southwest District  
Dayton, Ohio

1115351

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NATIONAL LEAD CORPORATION

P. O. BOX 39158



CINCINNATI, OHIO 45229

JUN 29 1978

4412

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Department of Energy  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Wasthole-175.

Sampling time or period: 6/26/78.

Permit discharge limit: Clearwell suspended solids daily maximum,  
40 mg/l.

Actual discharge measurement: 120 mg/l.

Remarks: This high concentration of suspended solids was caused by precipitation run-off into the clearwell. During the sampling period, about 2.3 inches of rain fell, most of it occurring in less than an hour. Retention time in the clearwell was not long enough to permit the complete settling of the heavy dirt load.

This occurrence was reported by phone, 6/27/78, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

Original Signed By

S. F. AUDIA

Manager

S. F. Audia

Manager

NWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak  
Central Files



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

April 28, 1978

Ms. Mariann Baumgartner  
U. S. EPA, Region V  
Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES DISCHARGE MONITORING REPORTS - FIRST QUARTER 1978

Enclosures 1. and 2. are the required quarterly data forms (EPA-3320-1) for the Department of Energy's Portsmouth Gaseous Diffusion Plant in Pike County, Ohio. (OH0006092) and the Feed Materials Production Center at Fernald, Ohio (OH0009580).

Enclosure 3. includes two noncompliance reports received recently from the FMPC. According to our records, with these reports EPA has now been provided information for all permit violations occurring at these two facilities during the first quarter of 1978. This includes 26 violations of the daily maximum limitations, 3 violations of the daily average limits and 21 violations of the monitoring requirements at Portsmouth; and 6 violations of the daily maximum limits and 2 violations of the daily average limits at Fernald.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures: As stated

CC w/Encl. 1 (Portsmouth):  
Mr. Steve Hamlin  
Ohio EPA, SE District

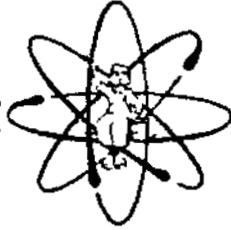
CC w/Encls. 2 & 3 (FMPC):  
Mr. Craig Cooperrider  
Ohio EPA, SW District

1115353

NATIONAL LEAD COMPANY OF OHIO  
A SUBSIDIARY OF NL INDUSTRIES, INC.

Encl. 3

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 20 1978

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

2751

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: Month of March, 1978

Permit discharge limit: Ammonia daily average, 75 mg/l

Actual discharge measurement: 98 mg/l

Remarks: Five samples were analyzed for ammonia during March. Three results were above 75 mg/l and the volumes were great enough to cause the flow-weighted average to exceed the permit limit.

This non-compliance occurrence was reported by phone, 4/14/78, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

1115354

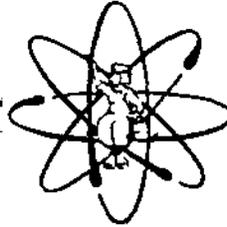
0496

APR 24 1978

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 20 1978

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

2752

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of March, 1978

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 202 mg/l

Remarks: There were 10 overflows recorded during March and high suspended solids concentrations were found in the samples from four flows. The maximum flow (41% of the total flow) contained the highest solids concentration (372 mg/l). This combination led to the high value for the daily average.

This non-compliance occurrence was reported by phone, 4/14/78, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

1115355



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

April 17, 1978

Ms. Mariann Baumgartner  
U.S. EPA, Region V  
Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES NONCOMPLIANCE REPORTS: FEED MATERIALS PRODUCTION CENTER,  
PERMIT NO. OH0009580

Please find attached five noncompliance reports DOE-ORO has received recently from the FMPC. The unusual suspended solids violation measured at the clearwell was discussed with you by Mr. James K. Alexander of my staff soon after its occurrence.

The other violations are also more or less related to the inclement weather conditions typical of this winter. Unless EPA has reasons to believe that it would be improper, we will no longer consider the chloride levels in the range of 350-1200  $\text{mg/l}$  that correlate with snow melt conditions to be NPDES violations. We will show the analytical results on the quarterly data submittals, but will not send a formal noncompliance report.

If you wish to discuss these or any of the other violations in more detail, please feel free to contact Jake Alexander of my staff, FTS 850-4176.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosure:  
Noncompliance Rpts. (5)

CC w/encl: Craig Cooperrider,  
Ohio EPA, Dayton, Ohio

1115356

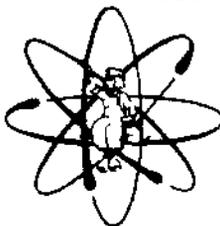
COPY

Jake

**NATIONAL LEAD COMPANY OF OHIO**

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 17 1978

**Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830**

1859

**Dear Mr. Fletcher:**

**REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009380**

**Outfall number and name: 002, Storm Sewer Outfall**

**Sampling time or period: 3/14/78**

**Permit discharge limit: Suspended solids daily maximum, 100 mg/l**

**Actual discharge measurement: 372 mg/l**

**Remarks: Melting snow and 0.56 inch of rain during the sampling period produced a storm sewer overflow of 547,000 gallons.**

**This occurrence was reported by phone, 3/15/78, to the Oak Ridge Safety & Environmental Control Division.**

**Sincerely yours,  
Original Signed By**

**S. F. AUDIA  
Manager**

**S. F. Audia  
Manager**

**MWB/dld**

**cc: M. W. Boback  
/H. D. Fletcher-2**

19 MAR 50  
A. F. Pennak  
C. Northerton

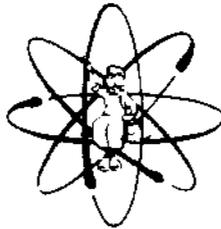
**Control Files**

1115357

**NATIONAL LEAD COMPANY OF OHIO**

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 17 1978

**Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830**

1858

**Dear Mr. Fletcher:**

**REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 000980**

**Outfall number and name: 002, Storm Sewer Outfall**

**Sampling time or period: 3/12/78**

**Permit discharge limit: Suspended solids daily maximum, 100 mg/l**

**Actual discharge measurement: 207 mg/l**

**Remarks: Making snow and 0.24 inch of scattered rain produced a storm sewer overflow of 211,900 gallons.**

**This occurrence was reported by phone, 3/15/78, to the Oak Ridge Safety & Environmental Control Division.**

**Sincerely yours,**

Original Signature

S. F. Audia

Manager

**S. F. Audia**

**Manager**

**MWB/dld**

**cc: M. W. Beback**

**/H. D. Fletcher-2**

**R. C. Heatherton**

**A. F. Pennak**

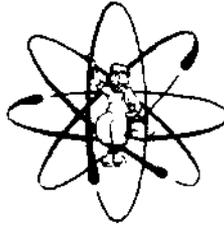
**Central Files**

1115358

**NATIONAL LEAD COMPANY OF OHIO**

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 17 1978

**Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830**

1857

**Dear Mr. Fletcher:**

**REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 000-580**

**Outfall number and name: 001, Manhole-175**

**Sampling time or period: 3/11/78 and 3/12/78**

**Permit discharge limit: Chloride daily maximum, 350 mg/l**

**Actual discharge measurement: 1110 mg/l (3/11/78) and 1080 mg/l (3/12/78)**

**Remarks: Road salt applied during the last two months was flushed into the storm sewer by melting snow, aided by 0.24 inch of scattered rain during the 24-hour sampling period of 3/12/78.**

**These two occurrences were reported by phone, 3/15/78, to the Oak Ridge Safety & Environmental Control Division.**

**Sincerely yours,  
Original Signed By**

**S. F. AUDIA  
Manager**

**S. F. Audia  
Manager**

**MWB/dld**

**cc: M. W. Boback  
H. D. Fletcher-2  
R. C. Heatherton**

**A. F. Pennak  
W. W. Wright**

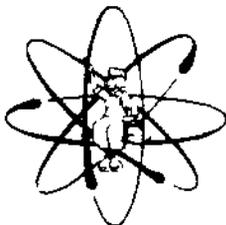
**Central Files**

1115359

**NATIONAL LEAD COMPANY OF OHIO**

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 4 1978

**Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830**

1856

**Dear Mr. Fletcher:**

**REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580**

**Outfall number and name: 001, Manhole-175**

**Sampling time or period: March 2, 1978**

**Permit discharge limit: Chloride daily maximum, 350 mg/l**

**Actual discharge measurements: 377 mg/l**

**Remarks: We think the elevated chloride concentration was caused by ice control salt being washed from the sidewalks and roads by precipitation run-off. Light rain totaled 0.15 inch during the sampling period. Additional run-off came from some melting of the 5.5 inches of snow on the ground.**

**This non-compliance occurrence was reported by phone, 3/13/78, to the Oak Ridge Safety & Environmental Control Division.**

**Sincerely yours,  
Original Signed By  
S. F. AUDIA  
Manager  
S. F. Audia  
Manager**

**MWB/dld**

**cc: M. W. Beback  
H. D. Fletcher-2  
R. C. Heatherton**

**A. F. Pennak  
W. W. Wright**

**Central Files**

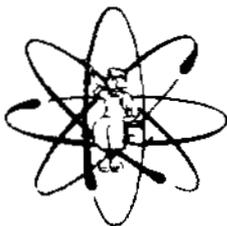
1115360

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158

CINCINNATI, OHIO 45239



PHONE: AREA CODE: 513-738-1151

MAR 8 1978

1526

Mr. M. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Department of Energy  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 009580

Outfall number and name: 001, Lannole-175

Sampling time or period: February 26, 1978

Permit discharge limit: 150 mg/l suspended solids daily maximum,  
mg/l

Actual discharge measurement: 62 mg/l

Remarks: No definite cause has been found for this noncompliance occurrence. Except for the sample collected 2/26/78, the maximum suspended solids concentration found during February was 15 mg/l.

Although they have not been known to be significant during February, there are two conditions which could influence the suspended solids content of Clearwell water. The Clearwell is not pumped every day and, when pumped, it is only done for part of the day. When there is no discharge, the pumps are kept operating but the water is recycled back to the Clearwell. This continuous operation is needed to prevent frozen lines which are difficult to thaw. The constant agitation may hinder normal settling. The second condition is the layer of ice in pit 5 and the Clearwell. This ice has reduced the residence time in both lagoons.

1115361

Mr. H. Deran Fletcher, Director

Page 2

This noncompliance occurrence was reported by phone, 3/1/78, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

By

DIA

Manager

J. V. Audia  
Manager

MHE/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - -  
A. C. Heatherton  
A. P. Pennington

Central Files

1115362

P. O. BOX 39158



CINCINNATI, OHIO 45238

PHONE: AREA CODE: 513-738-1151

JAN 16 1978

384

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box 2  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0002580

Outfall number and name: 902, Storm Sewer Outfall

Sampling time or period: Month of December

Permit discharge limit: Suspended Solids daily average, 30 mg/l

Actual discharge measurement: 58 mg/l

Remarks: Nine storm sewer outfall flows were recorded during the month of December. Samples from eight flows had a suspended solids concentration below the daily maximum of 100 mg/l. However, the concentrations were high enough to cause the flow-weighted monthly average to exceed 30 mg/l.

This non-compliance occurrence was reported by phone January 13, 1978, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

Original Signed By

S. F. AUDIA

Manager

S. F. Audia

Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherston  
A. F. Pennak

Central Files

RECEIVED



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

February 3, 1978

Ms. Mariann Baumgartner  
U.S. EPA, Region V  
Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

Subject: NPDES DISCHARGE MONITORING REPORTS - FOURTH QUARTER 1977

Enclosures 1. and 2. are the required quarterly data forms (EPA-3320-1) for the Department of Energy's Portsmouth Gaseous Diffusion Plant in Pike County, Ohio (OH0006092) and the Feed Materials Production Center in Fernald, Ohio (OH0009580).

Enclosure 3. includes 20 noncompliance reports received recently from Portsmouth and Enclosure 4. is one noncompliance report from the FMPC. According to our records, with these reports EPA has now been provided information for all permit violations occurring at these two facilities during the fourth quarter 1977. This includes 39 violations of daily maximum limitations and 6 violations of daily average limitations at Portsmouth; and 5 violations of daily maximum limitations and 2 violations of daily average limits at the FMPC.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated

CC w/Encls. 1. & 3. (Ports):

Mr. Steve Hamlin  
Ohio EPA, Southeast Distr.  
Route 3, Box 603  
Logan, Ohio 43138

CC w/Encls. 2. & 4 (FMPC):

Mr. Craig Cooperrider  
Ohio EPA, Southwest Distr.  
7 East Fourth Street  
Dayton, Ohio 45404

1115364

COPY

Juba



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

January 9, 1978

Ms. Mariann Baumgartner  
U.S. EPA Region V  
Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

Subject: NPDES NONCOMPLIANCE REPORTS; FEED MATERIALS PRODUCTION  
CENTER, NPDES PERMIT NO. OH0009580

Please find attached six noncompliance reports DoE-ORO has received from the FMPC since December 27, 1977. The fluoride violation that resulted from a leak in a hydrofluoric acid line was discussed with you by Mr. James K. Alexander of my staff soon after the violation was detected. As the reports indicate, all of these violations were the result of factors outside the scope of normal operations at the Plant except for the daily average violation for November for suspended solids at Outfall 002. This compliance problem has been documented extensively in earlier NPDES compliance correspondence.

Please reference Part III of the FMPC Permit, Page 14 of 14, with specific regard to the special study called for by January 1, 1978, in Requirement No. 3. In discussions at the plant with Messrs. Howard Stethers and Irving Bernstein of Region V EPA in February 1976, it was agreed that such a study was not an appropriate NPDES requirement and that it could be deleted in a permit modification. This study requirement and a similar requirement on the permit for the Portsmouth Gaseous Diffusion Plant were deleted from draft modifications received from A. H. Manzardo in May 1976. All activity towards preparing this study was discontinued pending these modifications. Please note that DoE does not plan to submit a report subject to this permit requirement. Preparation of the report described in the Part III requirements could not be considered to be a cost effective planning

1115365

*J. Baker*

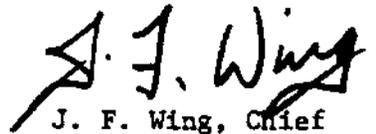
Ms. Mariann Baumgartner  
EPA-Region V

- 2 -

January 9, 1978

tool in view of the relatively early completion date called for. A rather comprehensive study to effectively scope BATEA requirements at major ORO facilities has been initiated recently. Our office will be in communication with EPA Regions IV and V in the near future in an effort to properly coordinate this study effort with the ongoing development of BATEA regulations by EPA.

Sincerely,



J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
Noncompliance reports (6)

CC w/encl:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

CC w/o encl:

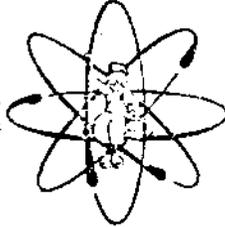
S. F. Audia, NLO  
H. Doran Fletcher  
A. A. Schoen, DOES-HQ, GTN. MS E-201

1115366

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 22 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

8004

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: December 15, 1977

Permit discharge limit: pH range, 6.5 - 8.5

Actual discharge measurement: pH 8.8

Remarks: Four hours of rain during the 24-hour sampling period produced a storm sewer overflow of 181,000 gallons. On three occasions, a level of pH 6 was measured at the Storm Sewer Lift Station. Lime was added to bring the pH within the permit range of 6.5 to 8.5. A slight excess could have caused the pH of 8.8.

This non-compliance occurrence was reported 12/21/77, by phone, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

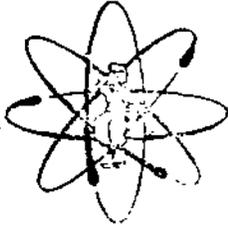
R. C. Heatherton  
A. F. Pennak

Central Files

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 22 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

8003

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of November

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 61 mg/l

Remarks: During November there were seven recorded storm sewer outfall flows. Although four flows had suspended solids concentrations below 30 mg/l, the volume-weighted average was 61 mg/l.

This non-compliance occurrence was reported 12/21/77, by phone, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

1115368

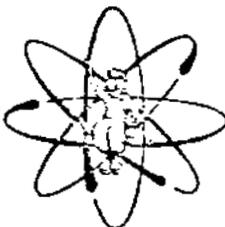
# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158

CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151



DEC 22 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

8002

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: December 13, 1977

Permit discharge limit: Chloride daily maximum, 350 mg/l

Actual discharge measurement: 424 mg/l

Remarks: Intermittent rainfall over most of the 24-hour sampling period flushed out more of the road salt chloride involved in the violations previously reported for December 9 and 10.

This violation was reported to the Oak Ridge Safety & Environmental Control Division, by phone, on December 21, 1977.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: W. J. Adams                      R. C. Heatherton  
M. W. Boback                        A. F. Pennak  
H. D. Fletcher-2                    W. W. Wright

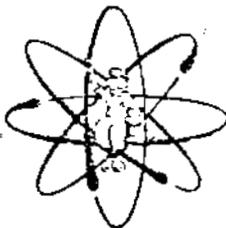
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1115369

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 22 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

8001

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: December 10, 1977

Permit discharge limit: Chloride daily maximum, 350 mg/l

Actual discharge measurement: 379 mg/l

Remarks: Although the temperature remained below freezing and there was no precipitation run-off, we believe this violation resulted from ice control efforts. Conditions which caused the violation reported for 12/9/77, produced a chloride-containing ground water which continued to drain into the plant sewer lines during the sampling period of 12/10/77.

The Oak Ridge Safety & Environmental Control Division was informed, by phone, on 12/13/77, that high chloride results were being investigated. This violation was confirmed, by phone, on 12/21/77.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

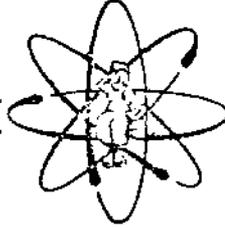
cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher-2  
R. C. Heatherton  
A. F. Pennak  
W. W. Wright

Central Files

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-1151

DEC 22 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

8000

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: December 9, 1977

Permit discharge limit: Fluoride daily maximum, 10 mg/l

Actual discharge measurement: 11 mg/l

Remarks: A leak in a dilute hydrofluoric acid line on December 4, 1977, is believed to be the cause of this violation. A rainfall of 0.34 inch plus melting snow and ice washed out residual fluoride left in the ground in the spill area.

This violation was reported to the Oak Ridge Safety & Environmental Control Division, by phone, on December 21, 1977.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher-2  
Central Files

R. C. Heatherton  
A. F. Pennak

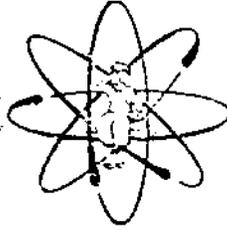
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# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158

CINCINNATI, OHIO 45239



PHONE: AREA CODE: 513-738-1151

DEC 29 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

7999

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: December 9, 1977

Permit discharge limit: Chloride daily maximum, 350 mg/l

Actual discharge measurement: 378 mg/l

Remarks: The only suspected source of chloride is the road salt used onsite to treat snow- and ice-covered roads. Rain and above-freezing temperatures during the 24-hour sampling period produced a run-off which dissolved the salt. During the cold weather preceding this run-off, 20 tons of salt were used to treat the plant roads and sidewalks. The total chloride in the plant effluent on 12/9/77 amounted to 2,381 lbs. Normal chloride discharge would have been about 500 lbs. The difference, 1,881 lbs., is about 8% of the chloride applied as road salt in the bad weather period immediately preceding the run-off.

The Oak Ridge Safety & Environmental Control Division was informed, by phone, on 12/13/77, that high chloride results were being investigated. The violation was confirmed, by phone, on 12/21/77.

Sincerely yours,

*S. F. Audia*  
S. F. Audia  
Manager

MWB/dld/rz

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher(2)

R. C. Heatherton  
A. F. Pennak  
W. W. Wright

Central Files

A PRIME CONTRACTOR FOR THE ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

1115372



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

November 11, 1977

Ms. Mariann Baumgartner  
U.S. EPA, Region V  
Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

Subject: NPDES DISCHARGE MONITORING REPORTS - THIRD QUARTER 1977

Enclosures 1. and 2. are the required quarterly data forms (EPA-3320-1) for the Department of Energy's Portsmouth Gaseous Diffusion Plant in Pike County, Ohio (OH0006092) and the Feed Materials Production Center at Fernald, Ohio (OH0009580).

Enclosure 3. includes 13 noncompliance reports received recently from Portsmouth and Enclosure 4. is one noncompliance report from the FMPC. According to our records, with these reports EPA has now been provided information for all permit violations occurring at these two facilities during the third quarter. This includes 50 violations of daily maximum limitations and 7 violations of daily average limitations at Portsmouth; and 7 violations of daily maximum limitations and 3 violations of daily average limits at the FMPC.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As Stated

CC w/Encls. 1 & 3 (Ports.):

Mr. Steve Hamlin  
Ohio EPA, Southeast Distr.  
Route 3, Box 603  
Logan, Ohio 43138

CC w/Encls. 2 & 4 (FMPC):

Mr. Craig Cooperrider  
Ohio EPA, Southwest Distr.  
7 East Fourth Street  
Dayton, Ohio 45403

1115373

COPY

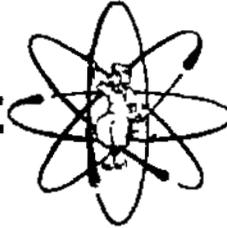
11/1/77

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158

CINCINNATI, OHIO 45239



PHONE: AREA CODE: 513-738-1151

OCT 20 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
Department of Energy  
P. O. Box E  
Oak Ridge, Tennessee 37830

6527

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of September

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 64 mg/l

Remarks: During the month, three storm sewer outfall flows were recorded. In two flows, the suspended solids concentration was above 30 mg/l (66 mg/l and 109 mg/l). The third flow contained only 18 mg/l but the flows were all of similar volume, producing an average which is above the permit limit.

This non-compliance occurrence was reported by phone, 10/18/77, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,



S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback

R. C. Heatherton

1115374 H. D. Fletcher-2

A. F. Pennak

Central Files

1352

OCT 25



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

October 18, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn Street, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

Subject: NPDES VIOLATIONS, PERMITS OH0006092 AND OH0009580

Please find attached 24 noncompliance reports for the subject permits in effect at DOE's Portsmouth Gaseous Diffusion Plant near Piketon, Ohio, and the Feed Materials Production Center near Fernald, Ohio. Most of the violations are related to recurring problems that have been discussed with EPA in prior correspondence.

Please note the unusual nature of the violations for hexavalent chromium at the Portsmouth 009 discharge on August 23, 1977, (see GAT report dated September 20), and at FMPC's 001 discharge on September 10 (see NLO report dated September 16). The fluoride violation at the FMPC was discussed with you over the phone by Mr. James K. Alexander of my staff.

The unintentional chromium release at Portsmouth was not identified on an NPDES violation until almost a month after the basic overflow occurred. While the 0.06 mg/l level does violate the current limitation in effect at Outfall 009, it is below the limit requested in modifications now pending before Region V for Permit No. OH0006092. It is also below the daily maximum limits in effect at Outfall 004, the normal RCW blowdown discharge now receiving treatment for chromium.

Sincerely,

Jerome F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosure:  
24 Reports

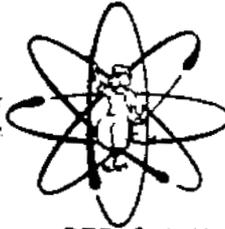
CC w/GAT letters:  
Mr. Steve Hamlin  
Ohio EPA  
Logan, Ohio

CC w/NLO letters:  
Mr. Craig Cooperrider  
Ohio EPA  
Dayton, Ohio

1115375

NATIONAL LEAD COMPANY OF OHIO  
A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 21 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

5851

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 9/17/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 109 mg/l

Remarks: Intermittent rain, amounting to less than 0.5 inch, produced an overflow of 62,500 gallons.

This non-compliance occurrence was reported 9/20/77, by phone, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

A handwritten signature in cursive script, appearing to read 'S. F. Audia', written in dark ink.

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher

R. C. Heatherton  
A. F. Pennak

Central Files

1115376

1250

SEP 26 1977

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

5713

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-1181

SEP 16 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: 9/10/77

Permit discharge limit: Fluoride daily maximum, 10 mg/l

Actual discharge measurement: 20 mg/l

Remarks: Hydrostatic testing of HF storage tanks produced a large volume of water containing a high fluoride content. This water is discharged to the tank farm sump and then is pumped into a nearby storage tank for subsequent transfer to the General Sump for treatment and disposal. It appears that some of this water was released from the tank farm sump. This release may have occurred because of a malfunctioning pH monitoring unit. The unit has been repaired.

This noncompliance occurrence was reported, by phone on 9/15/77 to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

1213

1115377



UNITED STATES  
ENVIRONMENTAL RESEARCH AND DEVELOPMENT ADMINISTRATION  
NATIONAL POLLUTION CONTROL OPERATIONS  
DIVISION  
1400 P O BOX TENNESSEE 37000

September 19, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS, OH009580

Please find attached 7 noncompliance report(s) recently received by ERDA-ORO for violations at the Feed Materials Production Center, Fernald, Ohio, NPDES Permit OH0009580.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated above

CC w/encl:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

**COPY**

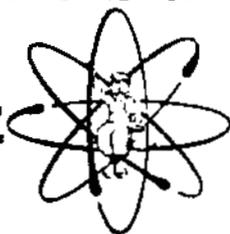
1115378

*J. also*

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 9 1977

5564

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of August

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 89 mg/l

Remarks: Six storm sewer overflows were recorded during the month. The suspended solids concentration range for the six flow samples was 32-146 mg/l.

This non-compliance occurrence was reported by phone, 9/7/77, to the OR Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

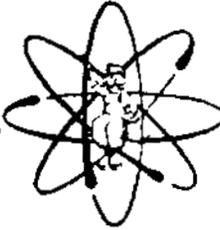
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NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 29 1977

5352

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 8/22/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 133 mg/l

Remarks: During a five-hour period, intermittent rainfall totaled 0.28 inch.  
The resulting run-off produced an overflow of 44,760 gallons.

This non-compliance occurrence was reported 8/26/77, by phone, to the  
Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

1115

WING

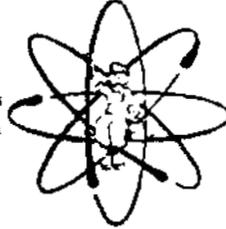
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NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

5121

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 19 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of July

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 95 mg/l

Remarks: During July, there were six days during which an overflow occurred at the storm sewer lift station. On four of the six days, the concentration of suspended solids in the daily sample exceeded the daily average limit of 30 mg/l.

This non-compliance occurrence was reported, by phone, on August 16, 1977, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "S. F. Audia".

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

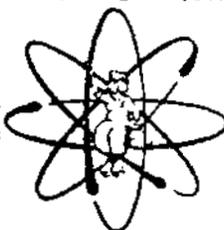
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NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 17 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

5102

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 8/12/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 138 mg/l

Remarks: A total of 1.25 inches of rain fell during the 24-hour sampling period ending at 8 a. m., August 12, 1977. This rain produced a storm sewer overflow that totaled 227,800 gallons.

This non-compliance occurrence was reported by phone, 8/15/77, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

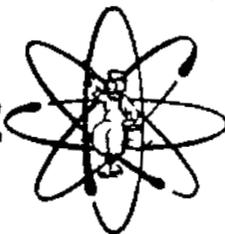
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1115302

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 11 1977

4985

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 8/7/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 146 mg/l.

Remarks: During a one-hour period, 0.09 inch of rain fell, with most of it occurring in a brief but heavy shower. The resulting run-off caused a storm sewer overflow of 13,200 gallons. This noncompliance occurrence was reported August 9 by phone to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

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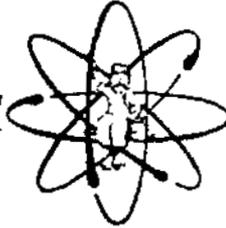
AUG 17 1977

1115383

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-1151

AUG 5 1977

4828

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 7/17/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 200 mg/l

Remarks: During the 24-hour sampling period there was 0.2 inch of rain. The rain occurred during a 30-minute period and the run-off resulted in a storm sewer overflow of 28,600 gallons.

This non-compliance occurrence was reported by phone to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "S. F. Audia".

MWB/dld

S. F. Audia  
Manager

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

1115384

Central Files

1020

AUG 10 1977

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 5 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

4829

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 7/18/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 1700 mg/l

Remarks: A break occurred in a high-pressure water line and before the flow could be shut off a quantity of soil was washed into the storm sewer system. The break caused an overflow of 12,000 gallons.

This non-compliance occurrence was reported by phone to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak

Central Files

1115385

1025

AUG 10 1977



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

August 3, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS, OH009580

Please find attached five noncompliance report(s) recently received by ERDA-ORO for violations at the Feed Materials Production Center, Fernald, Ohio, NPDES Permit OH0009580.

Sincerely,

Original Signed By  
J. F. Wing

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated above

CC w/encl:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403



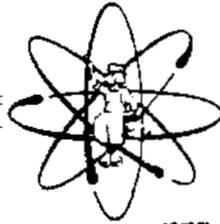
1115386

JKA

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUL 15 1977

4373

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of June

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 96 mg/l

Remarks: A total of nine storm sewer overflows occurred during June. The suspended solids concentration exceeded 30 mg/l in all but one of those flows.

This non-compliance occurrence was reported 7/14/77, by phone, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback  
H. D. Fletcher -2

R. C. Heatherton  
A. F. Pennak

JUL 15 1977

910

Central Files

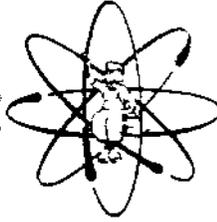
A PRIME CONTRACTOR FOR THE ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

1115387

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUL 1 1977

4096

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 6/26/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 194 mg/l.

Remarks: A lift station overflow of 57,100 gallons resulted from 0.74 inch of rain. This noncompliance occurrence was reported 6/28/77, by phone, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

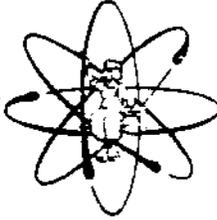
Central Files

831

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUL 1 1977

4097

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 6/28/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 155 mg/l.

Remarks: Over 0.5 inch of rain fell during the sampling period, resulting in a lift station overflow of 235,000 gallons. This noncompliance occurrence was reported, by phone, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

830

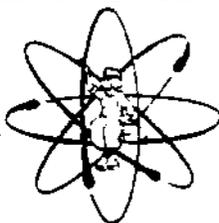
JUL 6 - 1977

1115389

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUN 20 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U.S. Energy Research & Development Administration  
P.O. Box E  
Oak Ridge, Tennessee 37830

3857

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of May

Permit discharge limit: Suspended solids daily average, 30 mg/l.

Actual discharge measurement: 54 mg/l

Remarks: During May, storm sewer outfall flows were recorded on six days. On three of those days, the suspended solids concentration was under 30 mg/l (10, 16, and 18 mg/l) and the volume total was 0.8 million gallons. For the other three flows, which totaled 0.9 million gallons, suspended solids exceeded 30 mg/l (54, 97, and 131 mg/l).

This non-compliance occurrence was reported by phone, 6/16/77, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

Central Files

1115390

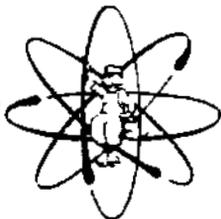
A PRIME CONTRACTOR FOR THE ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

777

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUN 9 1977

3642

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 6/7/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 235 mg/l.

Remarks: A storm sewer overflow of 28,800 gallons occurred when an elevated water tank was drained for inspection and maintenance.

This noncompliance occurrence was reported by phone on 6/7/77 to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak  
Central Files

1115391

A PRIME CONTRACTOR FOR THE ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

733



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

June 8, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS, OH009580

Please find attached two noncompliance report(s) recently received by ERDA-ORO for violations at the Feed Materials Production Center, Fernald, Ohio, NPDES Permit OH0009580.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated above

CC w/encl:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403



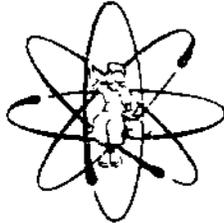
1115392

JKA

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAY 11 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

3067

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Cutfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 5/7/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 131 mg/l

Remarks: A lift station overflow of 23,600 gallons resulted from 0.09 inch of rain which fell in one hour during the sampling period.

This non-compliance occurrence was reported by phone to the Oak Ridge Safety & Environmental Control Division, May 11, 1977.

Sincerely yours,

A handwritten signature in cursive script that reads "S. F. Audia".

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback            R. C. Heatherton  
     H. D. Fletcher-2        A. F. Pennak

Central Files

619

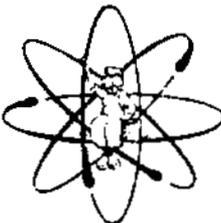
MAY 17 1977

1115393

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAY 23 1977

3252

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of April.

Permit discharge limit: Suspended solids daily average, 30 mg/l.

Actual discharge measurement: 95 mg/l.

Remarks: During April, the suspended solids concentration exceeded 30 mg/l in seven outfall samples. A result less than 30 mg/l was obtained for only one sample.

This noncompliance result was reported by phone to the Oak Ridge Safety & Environmental Control Division, 5/20/77.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

A PRIME CONTRACTOR FOR THE ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

1115394

663

MAY 26 1977



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

May 12, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS, OH009580

Please find attached one noncompliance report(s) recently received by ERDA-ORO for violations at the Feed Materials Production Center, Fernald, Ohio, NPDES Permit OH0009580.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated above

CC w/encl:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

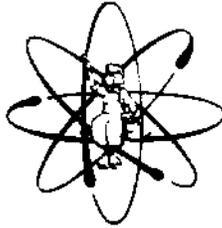


1115395

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 22 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

2547

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of March

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 52 mg/l

Remarks: There were nine recorded outfall flows during March. Suspended solids in samples from five flows were less than 30 mg/l. However, these flows were of low volume and had little influence on the flow-weighted average.

This non-compliance occurrence was reported by phone, 4/20/77, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback            R. C. Heatherton  
      H. D. Fletcher-2        A. F. Pennak

Central Files

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1115396



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483 2611

April 28, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES VIOLATIONS, OH009580

Please find attached three noncompliance report(s) recently received by ERDA-ORO for violations at the Feed Materials Production Center, Fernald, Ohio, NPDES Permit OH0009580.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated above

CC w/encl:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

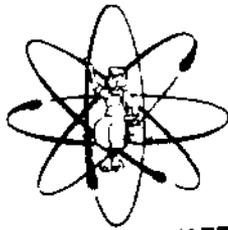


1115397

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 11 1977

2275

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0008580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 4/6/77

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 170 mg/l

Remarks: A trace of precipitation was recorded during the sampling period. Although light, it was enough to cause an overflow of 3400 gallons.

This non-compliance occurrence was reported by phone to the Oak Ridge Safety & Environmental Control Division on 4/7/77.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback      R. C. Heatherton  
H. D. Fletcher-2    A. F. Pennak

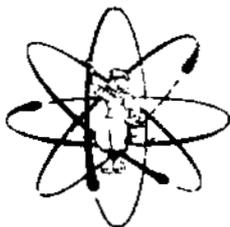
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1115398

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 11 1977

2175

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 4/3/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 109 mg/l.

Remarks: A storm sewer overflow of 112,600 gallons occurred due to moderate rainfall during the sampling period.

Sincerely yours,

S. F. Audia  
Manager

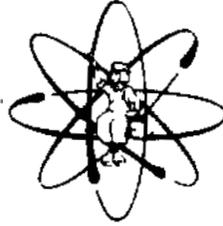
MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115399

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

APR. 6 1977

2174

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 4/2/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 151 mg/l.

Remarks: Heavy rain fell during five hours of the sampling period, resulting in a storm sewer outfall flow of 165,400 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115400



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483 8611

April 18, 1977

Ms. Mariann Baumgartner  
U. S. Environmental Protection Agency  
Region V, Enforcement Division  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Ms. Baumgartner:

NPDES NONCOMPLIANCE REPORTS: PERMITS OH0006092 AND OH0009580

Attached are two sets of noncompliance reports for NPDES violation at the two ERDA-ORO facilities in Region V during the first quarter, 1977. Enclosure 1 contains 16 reports for violations at the Portsmouth Gaseous Diffusion Plant, OH0006092. Several can be attributed to the harsh weather conditions during the quarter. The nitrate levels at outfall 001 remain a singular problem. Some possible mitigating actions are being discussed at this time.

Enclosure 2 includes 6 violation reports for ERDA's Feed Materials Production Center at Fernald, Ohio, OH0009580. With the exception of the pH violation caused by the ion exchange regeneration backwash (NLO report of January 12, 1977) and the pH excursion from the water plant filter backwash (NLO report of March 8, 1977), all of the FMPC violations are related to suspended solids at outfall 002. ERDA currently has a permit modification request for this parameter pending before EPA.

For future violations at these two facilities, ERDA will transmit violation reports to Region V as soon as possible after they are received from the operating contractors at the two plants. EPA will be contacted by phone for any unusually severe violations. ERDA assumes that the substantive requirements of Part II.A.2. "Noncompliance Notification" will be met by this procedure.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

For listing of enclosures  
and distribution see Page 2.



1115401

JKA

Ms. Mariann Baumgartner  
U.S. EPA, Region V

- 2 -

April 18, 1977

Enclosures:

1. Noncompliance Rpt. OH0006092
2. Noncompliance Rpt. OH0009580

CC w/encl. 1:

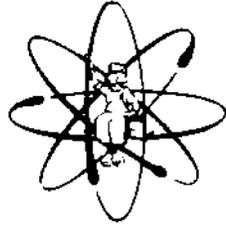
Mr. Steve Hamlin  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

CC w/encl. 2:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

1115402

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI OHIO 45239

SEP 19 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box 1  
Oak Ridge, Tennessee 37830

1589

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NALLS PERMIT NO. 101-00001

Outfall number and name: 100, Storm Sewer Outfall

Sampling time or period: Month of February

Permit discharge limit: Suspended solids daily average, 1

Actual discharge measurements: 120 mg/l

Remarks: Storm sewer outfall flows were recorded on 10 days during February. All daily samples had a suspended solids concentration which exceeded the permit average of 30 mg/l.

This non-compliance occurrence was reported by phone, 1/24/77 to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audie  
Manager

WFB/dld

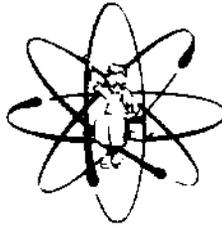
cc: H. W. Schacht      W. C. Hertherton  
H. D. Fletcher-2      W. T. Pennick

Control Files

1115403

14 7

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

MAR 8 1977

1506

Mr. H. Doren Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box 9  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT ON MONITORING OF WASTEWATER TREATMENT. DA 1003700

Outfall number and name: 002, Storm Sewer Co. 2017

Sampling time or period: 3/2/77

Sample discharge limit: chloride 1.5 - 2.5

Actual discharge compliance: N.D.

Remarks: In a 20-minute period, an overflow of 6,000 gallons occurred after  
wastewater treatment filters were being backwashed. Except for the 20, this water  
was of good quality. The actual chloride concentration was only 10 mg/l.

This non-compliance occurred on the morning of 3/2/77, at the Oak Ridge  
Office of Environmental Control Division.

Sincerely yours,

S. T. Audin  
Manager

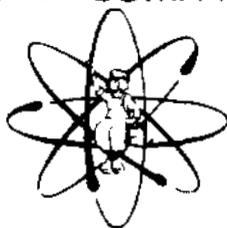
113/018

cc: J. J. Toback                      G. C. Heatherton  
H. D. Fletcher-2                  A. R. Pennak

Control Files

1115404

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

MAR 7 1977

1470

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 3/4/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 115 mg/l.

Remarks: About 1.5 inches of rain fell during the sampling period. Precipitation was steady for about 12 hours, with an occasional heavy downpour. This resulted in a total Storm Sewer overflow of 511,000 gallons.

This noncompliance occurrence was reported by phone, 3/4/77, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "S. F. Audia". The signature is written in a cursive style with a long, sweeping underline.

S. F. Audia  
Manager

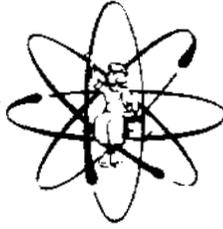
MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115405

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

APR 1 1977

1320

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 2/24/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 141 mg/l.

Remarks: During the 24-hour sampling period, rainfall amounted to 0.6 inches. This precipitation, combined with melting snow, produced an outfall volume of 311,000 gallons.

This noncompliance occurrence was reported by phone, 2/28/77, to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

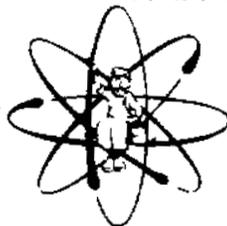
MWB/vvs

cc: W. J. Adams  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115406

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

FEB 14 1977

1104

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 2/13/77.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 148 mg/l.

Remarks: A light rain (0.18 inch) occurring over a 10-1/2-hour period and melting snow produced run-off causing an overflow of 132,000 gallons.

This occurrence was reported to the Oak Ridge Safety & Environmental Control Division by phone, 2/15/77.

Sincerely yours,

S. F. Audia  
Manager

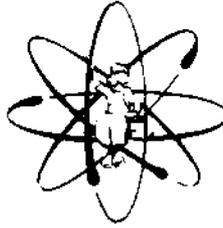
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cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115407

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JAN 1 1977

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: 1/10/77

Permit discharge limit: pH range of daily grab sample, 6.5 - 10.0

Actual discharge measurement: pH 11.0

Remarks: A momentary high pH was caused when the General Sump discharged caustic water used for deionizer regeneration.

This occurrence was reported by phone, 1/10/77, to the OR Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback            R. C. Heatherton  
     H. D. Fletcher-2        A. F. Pennak

Central Files

1115408



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-2611

February 2, 1977

Mr. Ron Mustard  
Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

NPDES DISCHARGE MONITORING REPORTS - FOURTH QUARTER, 1976

Enclosures 1 and 2 are the required quarterly data forms (EPA-3320-1) for the Portsmouth Gaseous Diffusion Plant at Portsmouth, Ohio (OH0006092) and the Feed Materials Production Center at Fernald, Ohio (OH0009580).

At Portsmouth only three daily maximum permit violations occurred during this quarter. All three were high fecal coliform counts in the sewage plant effluent. The strike of the Oil, Chemical and Atomic Workers, which includes about 1600 hourly employees at the Portsmouth plant, continued through most of the fourth quarter. During the strike, which lasted from August 9 through December 13, 1976, many of the support and maintenance functions not essential to the cascade operation were carried out by other plant personnel as time permitted. This partially explains the relatively small number of violations for this quarter, as most of the plant's pollutant effluents are related to support activities. It also seems to have been the indirect cause of at least two of the three violations, once when a chlorine gas cylinder was not changed and again when the hourly employees returned and the feed rate may not have been readjusted for the heavier load. The single coliform violations were high enough in October and November to cause the "daily average" values to be exceeded also. Enclosure 3 contains five Noncompliance Reports for the three daily maximum and two daily average violations. With EPA's approval, ERDA would like to begin submitting the more routine reports for each quarter with the Monitoring Reports rather than call your office. Exceptions will be made in the cases where the violations are unusual or have significant environmental consequences.

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OKA

February 2, 1977

Please find included with the data for Outfall 004 a special report submitted as required in Part III. 6., of the Portsmouth permit. The report does not include data for all the parameters listed for Outfall 004. We believe the report gives information relevant to the facility's operational status, however, and the Part III reporting requirement. Please note that the initial shakedown operation of the X-616 was terminated last August and was not resumed until December 15. The data from last summer, August 9-27, will not be submitted to EPA as it does not provide any useful information regarding the facility's performance.

At Fernald there were six violations of the daily maximum limitation and two violations of the daily average limitations. Enclosure 4 includes six noncompliance reports. Two reports of violations in early October were submitted with last quarter's data. There were significantly fewer violations this quarter than are normally experienced during a three-month operation at Fernald. Refinery operations are slowing down considerably, with dissolved solids, nitrates, and ammonia-nitrogen all much less concentrated than in the past. Note that ammonia nitrogen was in compliance with the "daily average" limit of 75 mg/l for all three months. Previously, this standard has been exceeded every month but one since the permit became effective. Also, unusually dry weather during the quarter reduced the number of violations at Outfall 002, the storm sewer overflow. Violations for suspended solids at this outfall are a direct function of the rainfall frequency.

ERDA has had pending for some time the issuance of a modified permit for Fernald. Proposed changes included increases in concentrations for several parameters for the interim period only (prior to July 1, 1977) at Outfall 001 and the deletion of a specific limitation on suspended solids at Outfall 002 through the permit's expiration. Since so much time has elapsed since our request for less stringent limits at the main outfall, and since the relief requested for the ammonia-nitrogen daily average limit was inadvertently not included in the proposed modifications that went to Public Notice on April 26, 1976, ERDA now respectfully requests that any further consideration of the proposed changes at Outfall 001 be discontinued. The lower levels of operation at the FMPC refinery should allow compliance with the July 1, 1977 limits as well as those now in effect. We wish to reiterate our desire for EPA to expedite the elimination of the specific limits for suspended solids at Outfall 002, however. As we have pointed out in previous correspondence, these violations are not of any environmental consequence. We believe it is inequitable to require ERDA to repeatedly report "noncompliance" with this standard and accept the adverse legal connotations of simply having a large number of NPDES violations on record. We request that in view of the

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withdrawal of our requests for changes at Outfall 001, the proposed changes for Outfall 002 be incorporated on a modified permit and the new permit be issued as soon as possible.

Part I. C. 1. of the permit for Fernald specified the submission of a "Report of Construction Progress" due on December 1, 1976. We regret an oversight in not submitting a report subject to this date in a timely manner. We have previously indicated that no information would be submitted subject to the entire schedule of compliance for Fernald, as no new treatment facilities were expected to be required to meet the standards effective July 1, 1977. We did agree to formally address each date on the schedule, however.

As it turns out, a relatively inexpensive project (about \$10,000) to improve coal pile drainage control has been implemented at Fernald. The coal pile at Fernald was enlarged significantly during the coal supply "panic" in 1973. Some of the coal purchased was of relatively poor quality and, specifically, high in sulfur content. Coal was stored in three low piles instead of one centralized and deep pile; the primary reason for this was concern about the possibility of spontaneous combustion in the pile of the poorer quality coal. The larger area used for coal storage, of course, aggravated drainage problems (elevated suspended solids at Outfall 002, that normally only discharges with heavy rains, and occasional high iron levels at Outfall 001). The pH levels at both outfalls tend to be more erratic during rainfall. This is also probably caused by excessive coal pile drainage.

Specific actions that have either been taken or are planned are as follows:

1. Eliminate the "south" coal pile by temporary delay in new deliveries and restore this area - completed November 1, 1976.
2. Ditch the north pile and channel drainage to a new retention pond to allow settling. A new pump and line from this pond to the FMPC Water Treatment Plant sump will be installed to allow the supernatant from the pond to be discharged through Outfall 001 - April 1, 1977.

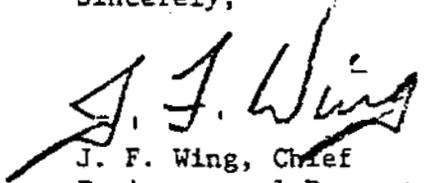
Mr. Ron Mustard

- 4 -

February 2, 1977

3. Eliminate the north coal pile entirely and return to the normal diversion of the normal coal pile drainage to the water treatment plant sump as was done to the expansion of onsite coal storage - October 1, 1977.

Sincerely,



J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. Forms EPA-3320-1 for PGDP
2. Forms EPA-3320-1 for FMPC
3. NPDES Noncompliance Rpt for GAT
4. NPDES Noncompliance Rpt for NLO

cc w/encls. 1&3:  
Mr. Fred Klingelhafer  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

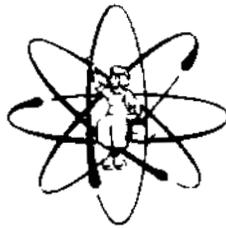
cc w/encls. 2&4:  
Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

cc w/encls. 3&4:  
Mr. Howard Stethers  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115412

NATIONAL LEAD COMPANY OF OHIO

7228



P. O. BOX 39158

CINCINNATI, OHIO 45239

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: December 13, 1976

Permit discharge limit:  $\text{Cr}^{+6}$  daily maximum .25 mg/l.

Actual discharge measurement: .33 mg/l.

Remarks: A break in the cooling water supply caused a loss of cooling water to the river.

This occurrence was reported 12/13/76 by phone to the Oak Ridge Safety and Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

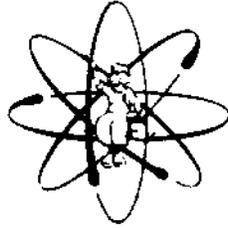
KNR/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

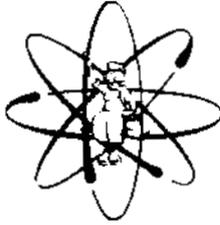
CINCINNATI, OHIO 45239

DEC 9 1976

Mr. H. Doran Fletcher Director

4072

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

6944

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operation Office  
U. S. Energy Research & Development Administration  
P. O. Box 11  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0000030

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 11/23/70

Permit discharge limit: suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 109 mg/l

Remarks: There were four hours of rain during the sampling period.  
Total outfall flow was 47,000 gallons.

This occurrence was reported 12/2/70 by phone to the Oak Ridge  
Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/ole

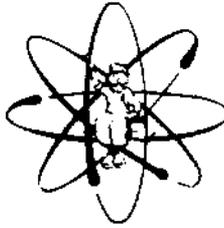
cc: M. W. Boback R. C. Heatherton  
H. L. Fletcher-2 A. F. Pennak

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NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

6850

NOV 12 1970

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0004500

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: Month of October.

Permit discharge limit: Suspended solids daily average, 20 mg l.

Actual discharge measurement: 34 mg l.

Remarks: During the month of October eight outfall samples were analyzed for suspended solids. All samples had a suspended solids concentration greater than 20 mg l.

This noncompliance item was reported 11/12/70 by phone to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "S. F. Audia".

S. F. Audia  
Manager

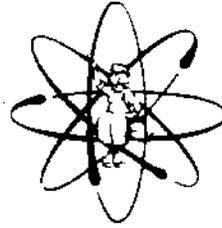
MWB ulc

cc: M. W. Boback R. C. Heatherton  
H. D. Fletcher-2 A. F. Pennak

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1115416

# NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

10/31/76

635J

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 10/31/76.

Permit discharge limit: pH range, 6.5 - 8.5.

Actual discharge measurement: pH 9.0.

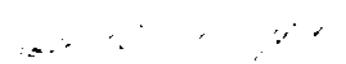
Remarks: The high pH probably resulted from efforts to neutralize acidic coalpile drainage at a sump located south of the Water Treatment Plant. This sump collects runoff from the south end of the coal storage area. Two pumps transfer the sump water to the main discharge line. During periods of heavy runoff, the flow into the sump exceeds the pump capacity and the excess overflows into the storm sewer system. The pH of the runoff from the coalpile area is usually low enough to cause pump corrosion and lime is added to the sump to avoid this damage. The lime addition cannot be closely controlled and an occasional excess is possible.

Plans have been made to increase the pumping rate from the sump. When that change is made, less sump water will overflow into the storm sewer. The pump replacement is one part of a plan for control of coalpile drainage.

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This occurrence was reported 11/2/76 to the Oak Ridge  
Safety & Environmental Control Division.

Sincerely yours,

  
S. F. Audia  
Manager

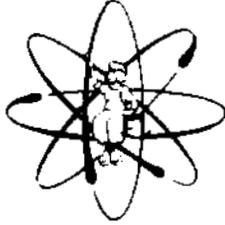
MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115418

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

NOV 1 1976

6352

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 10/31/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 120 mg/l.

Remarks: Steady rain produced an overflow at the storm sewer outfall of 377,100 gallons. Total rainfall during the 24-hour sampling time was 0.8 inch and occurred continuously over a 19-hour period. The solids are floc-like and have a pale red color, indicating that coalpile drainage is a major contributor.

This occurrence was reported November 1, 1976, by phone to the Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

*S. F. Audia*  
S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher 2  
R. C. Heatherton  
A. F. Pennak

1115419 Central Files



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

November 3, 1976

Mr. Ron Mustard  
Acting Chief, Federal Facilities  
Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

NPDES DISCHARGE MONITORING REPORTS - THIRD QUARTER 1976

Enclosed are the required quarterly data forms (EPA-3320-1) for ERDA's Feed Materials Production Center at Fernald, Ohio (OH0009580) and the Portsmouth Gaseous Diffusion Plant at Portsmouth, Ohio (OH0006092).

At Portsmouth thirty permit violations occurred during this quarter. A new NPDES permit, which became effective August 7, 1976, increased some parameter limits for Outfalls 001 through 008, and lowered the limits for Outfall 009 until July 1, 1977. The seven excursions reported for Outfall 009 occurred before August 7. The weekly sample required for Outfall 003 for the week of September 13-17, 1976, was discarded accidentally before it was analyzed.

At Fernald there were five daily average and nine daily maximum violations. Seven of the daily maximum and four of the daily average would not have been violations had the permit changes drafted by Region V last April been in effect. ERDA hopes that final issuance of the revised permit can be expedited to reduce the number of insignificant violations that are legally recorded. Regarding the non-compliance reports attached (enclosures 3 and 4), ERDA has notified Region V in writing of all violations during the third quarter of 1976. Most of these violations were discussed specifically with Mr. Howard Stethers.

One additional reporting requirement appearing on the new permit for Portsmouth, Part III (6), calls for a quarterly report to be prepared for the X-616 chromium removal process. The X-616 facility was put on line on August 9 and was operated more or less continuously until August 27, 1976. At about that time, the Oil, Chemical and Atomic



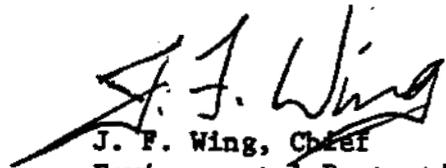
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November 3, 1976

workers for Goodyear Atomic Corporation went on strike, leaving <sup>an</sup> inadequate manpower for continued shakedown operation. It is doubtful that any further test operations can be scheduled until the strike is settled. Data were collected for chromium (+6) concentrations in the process effluent during this period, but not for any of the other parameters on page 7 of the permit. ERDA will furnish this data to EPA in a report responsive to the Part III requirement as soon as adequate additional data can be obtained.

Sincerely,



J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. GAT - NPDES Discharge  
Monitoring Report
2. Fernald - NPDES Discharge  
Monitoring Report
3. GAT - Report of Non-  
compliance OH0006092
4. NLO - Report of Non-  
compliance - OH0009580

cc: Mr. Fred Klingelhafer, w/encls. 1&3  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

Mr. Craig Cooperrider, w/encls. 2&4  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

Mr. Howard Stethers, w/encls. 3&4  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115421

Fletcher

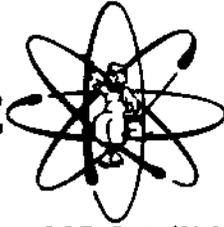
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NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158

CINCINNATI, OHIO 45239



PHONE: AREA CODE: 513-798-1181

OCT 25 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: October 20, 1976.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 171 mg/l.

Remarks: Near the end of the sampling period, after nine hours of gentle rain, a storm sewer overflow began. Total flow during the sampling period was 3220 gallons.

This occurrence was reported by phone October 22, 1976, to the ERDA Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

1115422

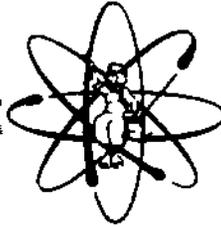
MWB/vvs

- cc: W. J. Adams
- M. W. Boback
- H. D. Fletcher - 2
- R. C. Heatherton
- A. F. Pennak

Central Files

045

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

OCT 14 1976

5899

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Administration  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of September.

Permit discharge limit: Suspended solids daily average, 30 mg/l.

Actual discharge measurement: 44 mg/l.

Remarks: During September, five storm sewer outfall samples were analyzed for suspended solids. Only two samples exceeded 30 mg/l but the flows for those two days were great enough to produce a flow-weighted average above the permit limit.

This occurrence was reported by phone October 12, 1976 to the ERDA Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

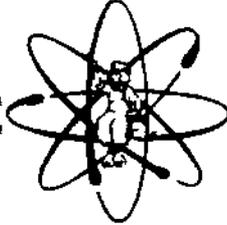
Central Files

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811

NATIONAL LEAD COMPANY OF OHIO

5898



P. O. BOX 39158

CINCINNATI, OHIO 45239

OCT 14 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Administration  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of September.

Permit discharge limit: Iron daily average, 1.2 mg/l.

Actual discharge measurement: 2.8 mg/l.

Remarks: Two Manhole-175 samples collected during September were analyzed for iron. Results were 5.0 mg/l and 1.0 mg/l. The flow-weighted average exceeds the permit limit.

This occurrence was reported by phone October 12, 1976 to the ERDA Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

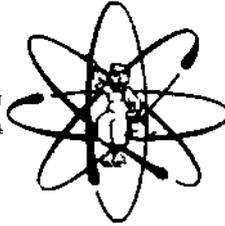
cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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614

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

OCT 6 1976

5719

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: October 1, 1976.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 120 mg/l.

Remarks: During the 24-hour sampling period rainfall amounted to about 0.3 inch. This precipitation resulted in an outfall flow of 73,630 gallons.

This occurrence was reported by phone October 4, 1976 to the ERDA Oak Ridge Safety & Environmental Control Division.

Sincerely yours,

S. F. Audia  
Manager

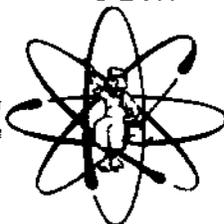
MWB/vvs

cc: W. J. Adams  
M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115425

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 21 1976

5429

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of August.

Permit discharge limit: Suspended solids daily average  $\leq 30$  mg/l.

Actual discharge measurement: 81 mg/l.

Remarks: During August, seven outfall samples were analyzed for suspended solids. Results were greater than 30 mg/l in five samples, causing the high average for the month.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

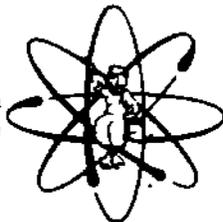
cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115426

NATIONAL LEAD COMPANY OF OHIO

5174



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 10 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 9/1/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 5 mg/l.

Remarks: A large standing pool of coal pile drainage was inadvertently drained into a storm sewer manhole in a brief period of time. The normally low pH of this drainage would have permitted a high iron concentration to develop through leaching of the coal and silt and through attack of the sewer pipe. The pool volume is not known but the flow was great enough to cause a low pH (3.5) at the storm sewer lift station located at the opposite end of the sewer system.

A study will be made to determine a suitable system of drainage control.

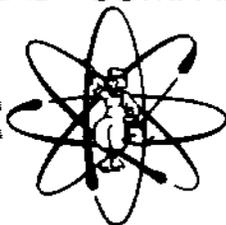
Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

3

1115427



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 2 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 7/27 '76

Permit discharge limit: pH range, 6.5 - 8.5

Actual discharge measurement: pH 5.7

Remarks: A storm sewer overflow began near the end of a sampling period. Coal pile drainage caused a pH of 5.5 in the initial flow but lime addition raised and maintained the water at about pH 8. The sampling period ended soon after the pH adjustment was made and the water sampled up to that point was principally the low pH part of the flow.

Sincerely yours,

S. F. Audia  
Manager

MMB/dlc

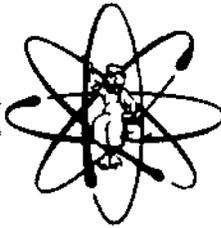
cc: M. W. Boback                      R. C. Heatherton  
H. D. Fletcher-2                      A. F. Pennak

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1115428

NATIONAL LEAD COMPANY OF OHIO

5079



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 2 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: 7/1/76

Permit discharge limit: Hexavalent chromium daily maximum, 0.25 mg/l

Actual discharge measurement: 0.36 mg/l

Remarks: There is no known reason for the elevated hexavalent chromium concentration. A sample collected one week later (7/8/76) contained only 0.03 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB, dld

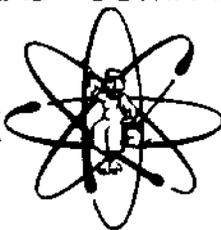
cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

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1115429

NATIONAL LEAD COMPANY OF OHIO

5075



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 2 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0000500

Outfall number and name: 001, Manhole-175

Sampling time or period: Month of July

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l

Actual discharge measurement: 111 mg/l

Remarks: Four samples were analyzed for ammonia nitrogen during the month. All results were under the permit daily maximum of 200 mg/l but all were above the permit daily average of 75 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

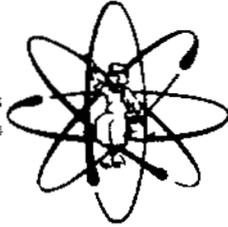
cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

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1115430

NATIONAL LEAD COMPANY OF OHIO

5076



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 2 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009560

Outfall number and name: CCI, Manhole-175

Sampling time or period: Month of July

Permit discharge limit: Hexavalent chromium daily average, 0.15 mg/l

Actual discharge measurement: 0.21 mg/l

Remarks: Two samples were analyzed for hexavalent chromium during the month. The highest concentration was ten times the lowest value, producing an average concentration which was above the permit value.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

Central Files

1115431

NATIONAL LEAD COMPANY OF OHIO

5076



P. O. BOX 39158

CINCINNATI, OHIO 45239

SEP 2 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0001580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 7 22 76

Permit discharge limit: pH range, 5.5 - 8.5

Actual discharge measurement: pH 5.8

Remarks: Acidic drainage from the coal pile dropped the storm sewer pH to 4.3. Lime addition raised the pH and maintained it at 6.5. Because of flow variations, proportionally more of the low pH water was sampled and produced the pH of 5.8 in the composite.

Sincerely yours,

S. F. Audia  
Manager

MWB/dlg

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                A. F. Pennak

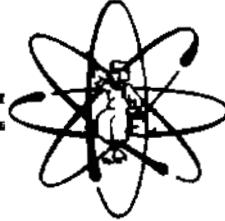
Central Files

1115432

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 31 1976

4967

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 8/26/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 123 mg/l.

Remarks: During the sampling period there was a storm sewer overflow of 192,000 gallons. This flow was caused by 0.94" of rain which fell during a three-hour period.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

8/31

1115433



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-0611

August 25, 1976

Mr. Ron Mustard  
Acting Chief, Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

REVISED NPDES PERMITS - OH0006092 AND OH0009580

Since the revised permit for the Portsmouth Gaseous Diffusion Plant (OH0006092) became effective on August 6, 1976, several ambiguities have arisen that, hopefully, can be resolved by this letter.

1. The note for the \*\* on page 7 of the permit, pertaining to Outfall 004, differs significantly both in wording and in meaning from the change that was proposed on the revision draft.

The draft stated the following: "Monitoring only for chromium and dissolved solids after the new chromium process becomes operational. Monitoring only sampling to be twice weekly."

The effective permit states the following: "The effluent limitations for Dissolved Solids and Chromium (+6) are applicable until June 30, 1976, or when the chromium removal process becomes operational, whichever is earlier. After this date, the limits on page 8 are applicable."

We assume that the June 30, 1976, date should have read June 30, 1977, and have notified Goodyear Atomic Corporation personnel of this apparent error. However, this correction still does not resolve what we find to be the exact opposite of the intent of the proposed permit modification. Under the present permit requirements, ERDA could not consider the X-616 chromium removal system "operational" for administrative purposes prior to July 1, 1977, unless it could be operated in a manner such that all the permit limitations effective after July 1, 1977, could be met consistently. We do not anticipate that the limitations for dissolved solids effective after July 1, 1977, can be attained when the

1115434



COPY

August 25, 1976

X-616 system is operated to optimize chromium reduction and removal. Dissolved solids levels in the 004 discharge have averaged about 2760 ppm during the last six months, with periodic values as high as 3800 ppm. Treatment in the X-616 facility, which is now in shakedown operation, may actually increase dissolved solids in the effluent. The "daily average" limitation after July 1, 1977, is 2500 ppm. ERDA considers the X-616 system to represent BPCTCA (and probably BATEA as well) for chromium removal and will probably request higher limits for dissolved solids compatible with optimum total chromium removal by X-616 as soon as this optimum operational mode can be attained. In any case, ERDA hopes that the X-616 can reduce Cr<sup>+6</sup> concentrations below the July 1, 1977 limits prior to that date. However, ERDA will not consider the dissolved solids levels in this discharge to be in violation unless they exceed 4500 ppm daily maximum or 4000 ppm daily average shown as applicable in the interim period between now and July 1, 1977, on page 7 of the permit.

2. In Part III of the revised permit, "Other Requirements," ERDA assumes that a submittal of all data collected for Outfall 004 and a brief data summary will satisfy the requirements of the "special report" called for in requirement 6. We hope that the data provided will establish a basis for a continuation of the higher interim limits for dissolved solids at this outfall through the duration of the permit.
3. The standards that now appear on the permit for Outfall 009 did not appear on the interim permit revision draft and no discussion of the parameters listed has ever taken place between ERDA, Goodyear Atomic, and EPA. We have since discussed the standards with GAT and, assuming you have no requests for an adjudicatory hearing from the State of Ohio or any other interested party, we find no particular problems with them. The footnote designated "\*\*\*\*" indicates the effluent limitations become effective July 1, 1977. ERDA, with EPA's concurrence, will assume that quarterly reporting using the EPA Form 3320-1 will satisfy the requirements of the footnotes designated "\*" and "\*\*". At this time, and until a water supply recarbonation project now scheduled for fiscal year 1977 can be completed, the pH of 009 discharges will frequently exceed 9.0. ERDA assumes that this will not constitute a violation of the permit condition between now and July 1, 1977. It is doubtful that the recarbonation project can be completed before March 1, 1978. ERDA hopes that arrangements can be made such that the rather routine violations of the pH limitation at this outfall between July 1, 1977, and March 1, 1978, can be summarized periodically, perhaps quarterly, rather than reported by phone and in writing each time a violation occurs. We would also hope that a similar arrangement would be adequate for pH violations at Outfalls 005 and 002, where compliance will also be contingent on projects scheduled for completion no sooner than March 1, 1978.

1115435

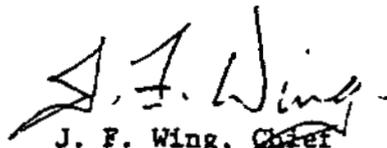
August 25, 1976

The status of NPDES compliance related projects was the subject of my July 2, 1976 letter to you. In that letter, on page 5, three footnotes lettered a, b, and c were included, but due to an oversight, the footnote letters did not appear in the text of the letter. Please note that footnote a. "This project was scheduled in 76-A," referred to the X-611 tie-line project described on page 3. Footnote b, "This project has been added to the the GAT GPP budget," referred to the X-611 Sludge Vault Modifications Project described on page 3. Footnote c, "This project has been delayed from FY 1976-A to FY 1977," referred to the Recycle X-611-B Lagoon Effluent project described on page 4.

NPDES Violation Reports

Enclosed are 11 noncompliance reports for violations that have occurred at the Portsmouth plant (enclosure 1) and 4 reports for violations at Fernald (enclosure 2). Of the 15 violations described, 8 would not have been considered violations with the limits that became effective at Portsmouth on August 6 and those still pending at Fernald. With regard to the issuance of the revised permit OH0009580 for Fernald, please contact us if any further significant delays are expected. You can reach me or James Alexander of my staff at FTS 850-4176.

Sincerely,



J. F. Wing, Chief

Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. NPDES Noncompliance - OH0006092
2. NPDES Noncompliance - OH0009580

cc w/encl. 1:

Mr. Fred Klingelhafer  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

cc w/encls. 1&2:

Mr. Howard Stethers  
Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

cc e/encl 2:

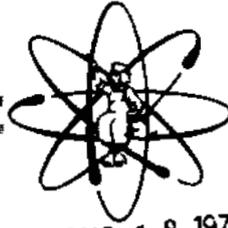
Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45402

1115436

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

AUG 18 1976

4755

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 8/13/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 433 mg/l.

Remarks: Rain began about one hour before the end of the sampling period. The initial run-off caused a low pH because of coal pile drainage and lime was dumped for neutralization. A sufficient quantity of lime was used in a single dumping to provide for continued neutralization of the drainage. As a result, an excess was initially present and this excess caused a high pH. The excess lime and the precipitate caused by neutralization produced a suspended solids concentration which exceeded the permit limit.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

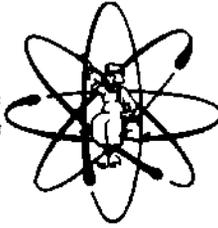
cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1181

AUG 18 1976

4754

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 8/13/76.

Permit discharge limit: pH range, 6.5 - 8.5.

Actual discharge measurement: pH 10.8.

Remarks: Rain began about one hour before the end of the sampling period. The initial run-off caused a low pH because of coal pile drainage and lime was dumped for neutralization. A sufficient quantity of lime was used in a single dumping to provide for continued neutralization of the drainage. As a result, an excess was initially present and this excess caused a high pH. The excess lime and the precipitate caused by neutralization produced a suspended solids concentration which exceeded the permit limit.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

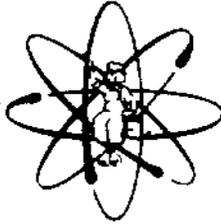
cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

8

1115438

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

AUG 11 1976

4612

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 8/6/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 131 mg/l.

Remarks: Total overflow at the storm sewer outfall during the sampling period was 101,140 gallons. The overflow was caused by 3.5 hours of moderate rainfall. There was 13.5 hours of rain during the entire calendar day and total rainfall during the day amounted to 2.32 inches.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115439

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

AUG 11 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
U. S. Energy Research & Development Adm.  
Oak Ridge Operations Office  
P. O. Box E  
Oak Ridge, Tennessee 37830

4612

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 7/27/76

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 226 mg/l.

Remarks: Total overflow at the outfall amounted to 82,320 gallons and was the result of 0.47 inch of rain during a three-hour period.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115440



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

July 28, 1976

Mr. Ron Mustard  
Acting Chief, Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

**NPDES DISCHARGE MONITORING REPORTS, SECOND QUARTER 1976**

Enclosed are the required quarterly data forms (EPA-3320-1) for ERDA's Feed Materials Production Center at Fernald, Ohio (OH0009580) and the Gaseous Diffusion Plant at Portsmouth, Ohio (OH0006092).

At Portsmouth twenty-two daily maximum permit violations occurred during the quarter; nineteen were pH excursions at Outfall 009. According to our records, all of the daily maximum violations have been reported to Mr. Howard Stethers by phone.

With the noncompliance reports attached (enclosure 3), ERDA has notified Region V in writing of most of the violations that have occurred during the second quarter of 1976.

At Fernald fourteen violations of the daily maximum limitation and six violations of the daily average limitation occurred during the quarter. With the more recent noncompliance reports for Fernald attached (enclosure 4), most violations have been reported in writing as well as by phone.

Of the thirty-six daily maximum violations reported, twenty-nine involve limitations that are soon to be revised such that these repeated violations will no longer occur. This is also true of six daily average violations at Fernald.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

**COPY**



See page 2 for enclosures and distribution

1115441

Mr. Ron Mustard

- 2 -

July 28, 1976

Enclosures:

1. GAT - NPDES Discharge  
Monitoring Report
2. Fernald - NPDES Discharge  
Monitoring Report
3. GAT - Report of Non-  
compliance OH0006092
4. NLO - Report of Non-  
compliance - OH0009580

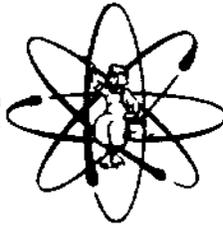
cc: Mr. Fred Klingelhafer, w/encls. 1&3  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

Mr. Craig Cooperrider, w/encls. 2&4  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

Mr. Howard Stethers, w/encls. 3&4  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115002

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUL 19 1976

4149

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: Month of June

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l

Actual discharge measurement: 138 mg/l

Remarks: Four samples were analyzed for ammonia nitrogen during June. In three samples the concentration was well above 75 mg/l which caused the average to exceed the permit value.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

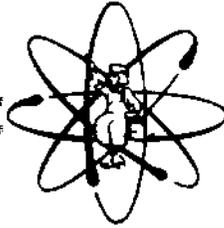
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1115443

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUL 19 1976

4150

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: Month of June

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 99 mg/l

Remarks: During June, nine out of the ten outfall samples had suspended solids concentrations exceeding 30 mg/l.

Sincerely yours,

S. F. Audia  
Manager

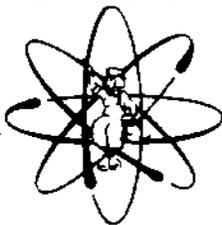
MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

Central Files

1115444

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUL 9 1976

3913

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0019580

Outfall number and name: C01, Manhole-175

Sampling time or period: 6/30/76

Permit discharge limit: Ammonia nitrogen daily maximum, 200 mg/l

Actual discharge measurement: 211 mg/l

Remarks: There were no unusual occurrences related to the out-of-compliance ammonia nitrogen concentration.

Sincerely yours,

S. F. Audia  
Manager

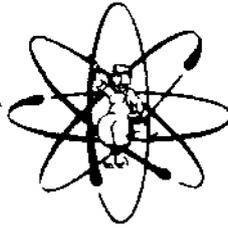
MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                A. F. Pennak

Central Files

1115445

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUL 8 1976

3914

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 6/30/76

Permit discharge limit: pH range 6.5 - 8.5

Actual discharge measurement: pH 8.6

Remarks: Rainfall during the sampling period was about 0.5 inch and produced an outfall flow of 131,000 gallons. No reasons are known for the slightly elevated pH.

Sincerely yours,

S. F. Audia  
Manager

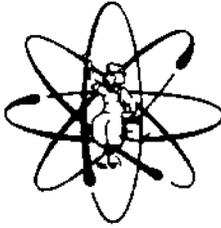
MWB/old

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

Central Files

1115446

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45229

JUL 8 1976

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

3774

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH WALES PERMIT NO. OH 0000000000

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 6/29/76

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 897 mg/l

Remarks: A large break occurred in a buried water line and the water was forced to the surface with considerable pressure. There was a brief heavy flow of muddy water to the storm sewer. Total outfall flow was 11,100 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB 816

cc: M. W. Boback R. C. Heatherton  
H. D. Fletcher-2 A. F. Pennak

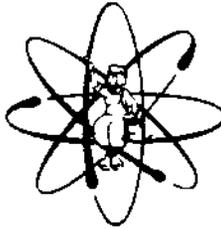
Central Files

JUL 7 1976

1115447

44

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUN 30 1976

3707

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 6-26-76

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 211 mg/l

Remarks: About 0.1 inch of rain fell during the sampling period, producing an outfall volume of 9800 gallons.

Sincerely yours,

S. F. Audia  
Manager

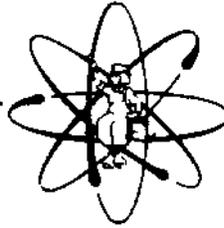
MWB/clg

cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                A. F. Pennak

Central Files

1115448

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUN 30 1976

370b

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 00095500

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 6/21/76

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 120 mg/l

Remarks: About 1-inch of rain fell during the sampling period, producing an outfall volume of 249,240 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

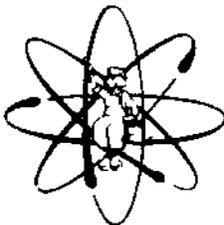
cc: M. W. Boback                      R. C. Heatherton  
     H. D. Fletcher-2                 A. F. Pennak

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1115449

NATIONAL LEAD COMPANY OF OHIO

P. O. BOX 39158



CINCINNATI, OHIO 45239

JUN 23 1976

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37831

3551

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NIDES PERMIT NO. OH 000,000

Outfall number and name: 001, 001 sewer outfall

Sampling time or period: 6/17/76

Permit discharge limit: pH range 6.5 - 8.5

Actual discharge measurement: pH 9.5

Remarks: About 1-inch of rain fell over a 4.5-hour interval during the sampling period. Total outfall flow was 374,000 gallons. The high pH was due to the use of about 300 pounds of lime slurry to neutralize a Tank Farm nitric acid leak and about 200 pounds used to neutralize acidic coal pipe drainage.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback R. C. Heatherton  
H. D. Fletcher-2 A. F. Pennak

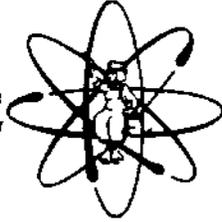
Central Files

1115450

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUN 14 1970

3395

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of May.

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l.

Actual discharge measurement: 134 mg/l.

Remarks: Four samples were analyzed for ammonia nitrogen during the month. All results were greater than the permit daily average limit.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115451

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUN 14 1976

3208

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: Month of May.

Permit discharge limit: Suspended solids daily average, 30 mg/ℓ.

Actual discharge measurement: 187 mg/ℓ.

Remarks: There were two storm sewer outfall flows during May.  
The concentration of suspended solids in both flows  
was greater than the permit daily average limit.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115452



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

July 2, 1976

Mr. Ron Mustard  
Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

NPDES - SCHEDULE OF COMPLIANCE REPORTS; FORMAL NOTICES OF VIOLATIONS,  
PERMITS OH0006092 AND OH0009580

The NPDES permit for ERDA's Feed Materials Production Center at Fernald currently specifies a "commencement of construction" date of June 1, 1976, in the Part I.c.1., Schedule of Compliance. The permit for the gaseous diffusion plant at Portsmouth specified an April 1, 1976 "commencement of construction" date and a "report of construction progress" by December 1, 1976.

Our most recent correspondence to you on these subjects dealt with the April 1 date for Portsmouth (Wing to Mustard, April 6, 1976). Other correspondence dealing with the Schedules of Compliance for either Portsmouth or Fernald has been submitted on February 18, 1976 (Wing to Wallgren), November 4, 1975 (Travis to MacDonald), September 15, 1975 (Travis to MacDonald), and August 13, 1975 (Travis to MacDonald). According to our records, all dates on both Permit Compliance Schedules have been formally acknowledged.

ERDA currently has pending proposed changes for the specific reporting requirements for each of the schedule dates (Public Notice numbers 55F-0003M and 55F-0004M, issued May 3, 1976). Both permits will specify reports on "project work" for the dates originally specified, deleting "construction" phrasing. This was deemed appropriate for two reasons:

1. The Fernald Plant will significantly reduce uranium concentrate refining on or about July 1, 1977, and is expected to meet all July 1, 1977 effluent requirements with no new major pollution abatement facilities. Therefore, "construction" wording is not really applicable.



COPY

1115453

July 2, 1976

2. The Portsmouth plant has planned for several new environmental control projects to meet NPDES requirements. It has others quite close to completion. The projects nearly complete were funded as part of a line item in the FY 1974 budget. These were planned, designed, and under construction prior to issuance of NPDES permits. As a rule, the budgetary process for a line item usually takes about three years. The new projects will be funded with General Plant Projects (GPP) funding where cost scoping, design, and other project planning can take as long as 12 to 18 months. As a result, these projects are scheduled in FY 1977, which begins October 1, 1976. No formal design or construction can actually begin until then. These two divergent situations have also tended to negate the meaning of "final plans" or "construction" in the schedule of compliance reports for Portsmouth.

#### Current Status of NPDES Project Requirements

Fernald - The situation described in ERDA's August 13, 1975 letter in the discussion above still prevails. Current compliance problems are mostly related to limitations imposed for the interim period that were largely based on inaccurate or inadequate data. The proposed permit modifications now pending will correct most of these problems.

Portsmouth - Four projects that were determined to be necessary in addition to the FY 1974 line item work were described in the "Final Funding" report requirement by November 1, 1975. This report (GAT-R-592) was submitted to you November 4, 1975, and followed up the "Preliminary Progress Report," submitted on September 15, 1975, which identified and briefly discussed the various outstanding NPDES problems.

At this time, a relatively recent finding at Portsmouth related to a very infrequent discharge to Little Beaver Creek from the Water Treatment Plant has necessitated minor rescheduling of one of the four projects discussed in the November Report. The unpermitted discharge has occurred on a few occasions when the sand filters at the water plant are backwashed. Normally, backwash discharges from the water plant go to a sludge vault equipped with pumps that transport the effluent to the permitted holding pond, Outfall 005. At the time the permits were being prepared, it was thought that more careful scheduling of backwashing would eliminate any overflow from the sludge vault. However, it has been found that despite rescheduling, the capacity of the pumps at the sludge vault is exceeded when the filters are backwashed properly. Currently, reduced backwash flows are used on a more frequent basis to avoid unpermitted overflows.

July 2, 1976

Rather than submit applications to Region V to have a new discharge permit added to the Portsmouth permit, ERDA and Goodyear Atomic Corporation have initiated a project to correct this problem as quickly as possible. FY 1976-A GPP funds will be used to correct the sludge vault capacity problem. Due to the time lag inherent with processing a new NPDES discharge point (which would be further complicated by ERDA's and GAT's lack of data on the actual nature of this discharge) ERDA would recommend that no specific NPDES permit modifications be attempted. As an alternative, ERDA recommends that during the relatively short period before this discharge route is eliminated that any "violations," i.e., unpermitted discharges, be reported relative to Outfall 005; applying the interim limitations for suspended solids, dissolved solids, and pH at the sludge vault overflow point. These limitations would be applicable, we believe, as the overflow is physically and chemically similar to that from 005.

The need for the GPP project to correct the problem at the water plant will require revision of the compliance project scheduling previously submitted. At this time, ERDA considers the following schedule to be the most realistic within the constraints of our budgetary process.

NPDES Compliance Projects\*

1. Project: X-611 Tie Line; Budget Year FY 1976 at \$14,600,  
Expected completion date: Pending

The floor drains in the chemical room at the X-611 presently empty at a point east of the Water Plant into Little Beaver Creek. When flushing the lime slakers in the room and regenerating the water softeners, solids and high pH water are discharged into the drains. The tie lines will connect the drains to the sludge lines going to the X-611B sludge lagoons.

2. Project: X-611 Sludge Vault Modifications; Budget Year FY 1976-A at \$100,000,  
Expected completion date: 1/1/78

The drainage from the sludge pump vault located on the west side of the primary basins is collected from all the basins and includes the backwash water from the filter house. The vault size and pump capacity are not great enough to handle the backwash water from a filter when it is properly washed. This has caused the vault to

\*Revision from GAT-R-592, submitted to EPA November 4, 1975.

overflow on a few occasions and the water containing suspended solids to enter Little Beaver Creek. The drainage of sludge from the slow mix and/or the settling basins during maintenance also results in pumping problems. The concentrated sludge is very difficult to pump and usually must be removed manually from the vault. A small clarifier will be installed as a replacement for the present sludge vault. The clarifier would be capable of concentrating solids and producing a clear softened effluent that could be returned to the primary treatment basins. The suspended material in the backwash water and the heavier sludge from the basins would be concentrated and transferred to an adjoining compartment where they would be removed by a conveyor and hauled to a landfill. The added capacity of the clarifier would prevent any overflowing and would result in the reclaiming and recycling of a softened water for plant use. This project would not only prevent any further NPDES violations, but would also be a cost savings item in the reduction of power needed to pump raw water.

3. Project: Recycle X-611B Lagoon Effluent; Budget Year FY 1977 at \$203,500,  
Expected completion date: 3/1/78

The effluent from the X-611B lime softening lagoon (NPDES Outfall 005) will not meet the limitation effective July 1, 1977, for pH (59.0). This project will consist of constructing a concrete reinforced pumping station at the X-611B lagoon. The station will be equipped with two centrifugal pumps and necessary controls to maintain the lagoon level below the discharge pipe, except during rains over two inches, by pumping the impounded water to the X-611 Facility by means of a ten-inch pipe. A flow recorder and emergency pump off-on controls will be installed at the water plant.

4. Project: Recarbonation of Sanitary Water; Budget Year FY 1977 at \$128,900,  
Expected completion date: 3/1/78

Lime softened water is not stable in that it is saturated with magnesium and calcium carbonates which can cause deposits in pipes and equipment. Recarbonation is a practical corrective treatment which adds controlled amounts of CO<sub>2</sub> or acid to the softened water to reduce the saturation of carbonates and bring about stabilization in the pH range of 8.3 to 8.5. Presently, there are large amounts of high pH water used in various cooling systems that discharge at several NPDES outfalls (001, 002, 003, 009). This project consists of altering the existing coagulant basin at the water plant and installing two submerged combustion burners in the basin with controls for each burner located in the X-611C filter house.

Mr. Ron Mustard

- 5 -

July 2, 1976

5. Project: pH Adjustment Station for South Holding Pond; Budget Year FY 1977 at \$169,500,  
Expected completion date: 3/1/78

pH at the South Holding Pond can go as low as -2.5 on occasion. Flows to the basin will be collected in a concrete mixing basin where they will be neutralized with lime. The mixing basin will have an agitator with a 15 horsepower motor. The lime feedline will come to the basin from a small instrument and pump house. The pump house will be equipped with a pH control system, lime dilution tanks, and proportioning pumps. A 0.5M NaOH solution will be supplied from a 5000 gallon fiberglass vertical storage tank. A fill pump and an earthen dike around the tank will be provided.

- a. This project was scheduled in 76-A.
- b. This project has been added to the GAT GPP budget.
- c. This project has been delayed from FY 1976-A to FY 1977.

NPDES Violation Reports

Enclosed are 14 noncompliance reports for violations that have occurred at the Portsmouth plant (enclosure 1) and 10 reports for violations at Fernald (enclosure 2). Of the 24 violations described, only 4 would have been considered violations had the interim standards that are now pending in Region V been in effect.

All of these violations have been reported by telephone to Mr. Howard Stethers of Region V EPA; most within five days of their occurrence.

Sincerely,

*for* *H.W. Hibbitts*  
J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. Rpt. of Noncompliance With  
NPDES Permit No. OH0006092 - GAT
2. Rpt of Noncompliance With  
NPDES Permit No. OH0009580 - NLO

See page 6 for distribution

1115457

Mr. Ron Mustard

- 6 -

July 2, 1976

cc w/encl. 1:

Mr. Fred Klingelhafer  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

cc w/encl. 2:

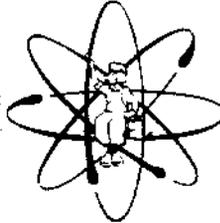
Mr. Craig Cooperrider  
Ohio EPA Southwest District  
7 East Fourth Street  
Dayton, Ohio 45402

cc w/encls. 1&2:

Mr. Howard Stethers  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115458

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

JUN 23 1976

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

3552

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 6/17/76

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 120 mg/l

Remarks: About 1-inch of rain fell over a 9.5-hour interval during the sampling period. Total outfall flow was 374,000 gallons. Solids would have been caused by the run-off and by the use of 500 lbs. of lime used to neutralize a Tank Farm nitric acid leak and acidic coal pile drainage.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback R. C. Heatherton  
H. D. Fletcher-2 A. F. Pennak

Central Files

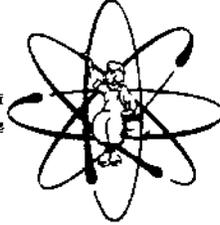
1115459

670

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JUN 4 1976

3210

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: May 31, 1976.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 208 mg/l.

Remarks: During the 24-hour sampling period there was about five hours of rain, including thundershowers. As a result, run-off caused a storm sewer overflow of 257,300 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115460

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-1151

JUN 1 1976

3158

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 5/22/76.

Permit discharge limit: Dissolved solids daily maximum, 18,000 mg/l.

Actual discharge measurement: 23,700 mg/l.

Remarks: This noncompliance occurrence is the result of a 192,000-gallon flow from the General Sump, containing 44,000 mg/l dissolved solids. Total flow at MH-175 was 402,000 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

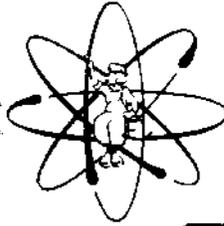
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1115461

331



NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

MAY 18 1976

2920

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: Month of April

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l

Actual discharge measurement: 165 mg/l

Remarks: Three samples were analyzed for ammonia nitrogen during the month. The concentration in one sample was low (64 mg/l) but high concentrations in the other two samples raised the average above the permit limit.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "S. F. Audia".

S. F. Audia  
Manager

MWB/dld

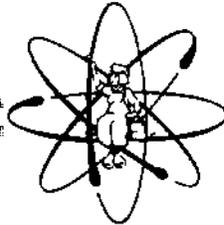
cc: M. W. Boback R. C. Heatherton  
H. D. Fletcher-2 A. F. Pennak  
Central Files

1115463

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 30 1976

2548

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: 4-22-76

Permit discharge limit: Suspended solids daily maximum, 200 mg/l

Actual discharge measurement: 231 mg/l

Remarks: About 0.4 inch of rain caused four separate intervals of storm sewer overflow during the sampling period. Total overflow was 97,600 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/ dld

cc: M. W. Boback            R. C. Heatherton  
P. G. DeFazio            A. F. Pennak  
H. D. Fletcher-2        Central Files

1115464

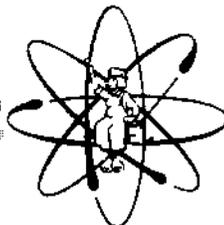
474

NATIONAL LEAD COMPANY OF OHIO  
A SUBSIDIARY OF NL INDUSTRIES, INC.

*Fletcher*

2448

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 26 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 4/16/76.

Permit discharge limit: Grab sample pH range, 6.5 - 10.0.

Actual discharge measurement: 10.1.

Remarks: No unusual conditions were noted during the sampling period. The pH of the 24-hour composite sample was 8.8.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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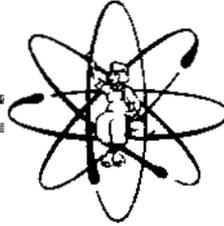
457

Fletcher  
2447

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 26 1976

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 4/21/76.

Permit discharge limit: Suspended solids daily maximum, 200 mg/l.

Actual discharge measurement: 598 mg/l.

Remarks: One-half hour of rain fell during the sampling period.  
This caused a storm sewer overflow of 15,480 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

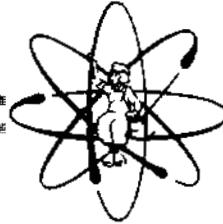
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450

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 26 1976

2445

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 4/17/76.

Permit discharge limit: Chloride daily maximum, 450 mg/l.

Actual discharge measurement: 490 mg/l.

Remarks: During the sampling period a water softener was regenerated with 400 lbs. of sodium chloride. Under normal conditions this additional chloride load would not have caused the limit at MH-175 to be exceeded. Recently, however, the dilution afforded by storm water has been reduced because of dry weather.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

1115467

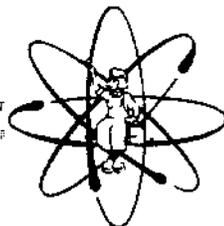
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459  
APR 29 1976

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 20 1976

2371

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: April 14, 1976

Permit discharge limit: Ammonia nitrogen daily maximum, 200 mg/l

Actual discharge measurement: 221 mg/l

Remarks: This concentration of ammonia at MH-175 is believed due to normal operating conditions coupled with a reduction in the routine flow of ammonia-free dilution water. The General Sump effluent is the source of the ammonia and the Sump volume on 4/14/76 was 190,000 gal. Total combined flow at MH-175 was only 291,000 gal. Recent dry weather has reduced the contribution of dilution water from the storm sewer system.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback            R. C. Heatherton  
     P. G. DeFazio            A. F. Pennak  
     H. D. Fletcher-2        Central Files

434

1115068



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

April 26, 1976

Mr. Ron Mustard  
Acting Chief, Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

NPDES DISCHARGE MONITORING REPORTS, FIRST QUARTER 1976

Enclosed are the required quarterly data forms (EPA-3320-1) for ERDA's Feed Materials Production Center at Fernald, Ohio (OH0009580), and the Gaseous Diffusion Plant at Portsmouth, Ohio (OH0006092).

At Portsmouth eighteen daily maximum permit violations occurred during the quarter; sixteen were pH excursions (principally at Outfalls 002 and 009), two were suspended solids violations caused by storm water at Outfall 002. One daily average violation for fluoride occurred at Outfall 001 for the month of March and one for suspended solids at 002 for February. According to our records, all of the daily maximum violations were reported to Mr. Howard Stethers by phone, usually within five days of their occurrence. The daily average violation for suspended solids at 002 in February was overlooked until mid-April. Also, please note that grab samples from Outfalls 006 and 008 were not collected during January and February due to an oversight. Normally there is no flow from these outfalls but a frozen sludge line to the normal discharge point (005) forced Goodyear Atomic to use the old lagoons temporarily. ERDA regrets these oversights.

With the noncompliance reports attached (enclosure 3), ERDA has notified Region V in writing of all violations that have occurred during the first quarter of 1976.

At Fernald twenty-three violations of the daily maximum limitation and five violations of the daily average limitation occurred during the quarter. All but three of these were reported by phone within five days

1115469



COPY

Mr. Ron Mustard

- 2 -

April 26, 1976

of their occurrence. With the more recent noncompliance reports for Fernald attached (enclosure 4), all violations have been reported in writing.

Sincerely,

  
J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. GAT - NPDES Discharge  
Monitoring Report
2. Fernald - NPDES Discharge  
Monitoring Report
3. GAT - Report of Non-  
compliance OH0006092
4. NLO - Report of Non-  
compliance - OH0009580

cc: Mr. Fred Klingelhafer, w/encls. 1&3  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

Mr. Craig Cooperrider, w/encls. 2&4  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45403

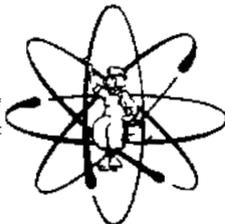
Mr. Howard Stethers, w/encls. 3&4  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115470

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 15 1976

2302

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of March.

Permit discharge limit: Suspended solids daily average, 30 mg/l.

Actual discharge measurement: 129 mg/l.

Remarks: Seven outfall flows were recorded during the month. One sample contained 13 mg/l suspended solids. The concentration range in the other samples was 31-208 mg/l. Therefore, the average exceeded the permit limit of 30 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

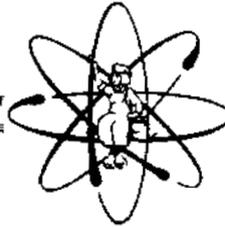
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42

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 15 1976

2299

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of March.

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l.

Actual discharge measurement: 93 mg/l.

Remarks: During the month, five samples were analyzed for ammonia nitrogen. The ammonia concentrations in two samples were low (8 and 60 mg/l) but the concentrations in the other samples were high enough to cause the average for the month to exceed the permit limit.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

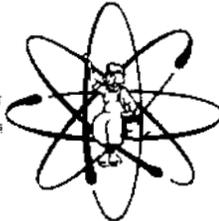
1115472 Central Files

427

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 15 1976

2301

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 4/13/76.

Permit discharge limit: Dissolved solids daily maximum, 18000 mg/l.

Actual discharge measurement: 19190 mg/l.

Remarks: No unusual conditions were noted during the sampling period except for slightly elevated dissolved solids in the General Sump effluent (27640 mg/l).

Sincerely yours,

A handwritten signature in cursive script, appearing to read "S. F. Audia".

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

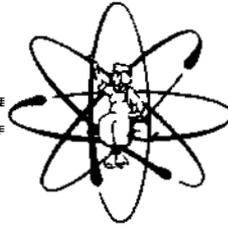
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122

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

APR 15 1976

2300

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: April 7, 1976.

Permit discharge limit: Ammonia nitrogen daily maximum, 200 mg/ℓ.

Actual discharge measurement: 241 mg/ℓ.

Remarks: No unusual circumstances were reported for the 24-hour sampling period.

Sincerely yours,

S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher  
R. C. Heatherton  
A. F. Pennak

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1115474

419



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 4838611

April 6, 1976

Mr. Ron Mustard  
Acting Chief, Federal Facilities Branch  
U. S. EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Mustard:

NPDES - SCHEDULE OF COMPLIANCE REPORTS AND VIOLATION REPORTS - PERMITS  
OH0006092 and OH0009580

Part I.c.1. of the NPDES permit for the Portsmouth Gaseous Diffusion Plant specifies a "commencement of construction" date of April 1, 1976, for projects to achieve compliance with effluents standards effective July 1, 1977. As ERDA has indicated in previous correspondence, specifically the letter from me to Mr. Wallgren of February 18, 1976, construction of several pollution abatement projects at Portsmouth cannot proceed at this time due to the fiscal restraints of the Federal Government's budget cycle. Other projects for pollution abatement, principally the X-616 facility to remove chromium from the plant's RCW blowdown, are already under construction and will be completed well in advance of the July 1, 1977 compliance date.

Attached to this letter are 11 noncompliance reports for violations that have recently occurred at the Portsmouth plant (Enclosure 1) and 15 reports for violations at the Feed Materials Production Center at Fernald (Enclosure 2). All of these were discussed by phone with Mr. Howard Stethers soon after each occurrence.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. NPDES No. OH0006092 - GAT
2. NPDES No. OH0009580 - NLO

See page 2 for distribution

COPY

1115475



Mr. Ron Mustard

- 2 -

April 6, 1976

cc w/encl. 1:  
Mr. Fred Klingelhafer  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

cc w/encl. 2:  
Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45402

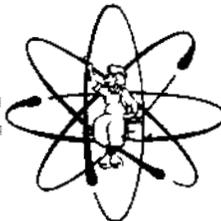
cc w/encs. 1 & 2:  
Mr. Howard Stethers  
US EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115476

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 23 1976

1752

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH CCC9580

Outfall number and name: 002, Storm sewer outfall

Sampling time or period: 3/21/76

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 199 mg/l

Remarks: During the 24-hour sampling period 0.59 inch of rain fell during a 3.5-hour period. Total volume of flow at the outfall was 181,000 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
P. G. DeFazio                        A. F. Pennak  
H. D. Fletcher-2                      Central Files

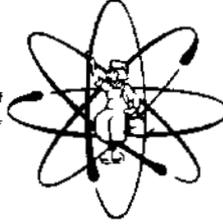
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NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 18 1976

1652

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: March 13, 1976

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 208 mg/l

Remarks: Rainfall during the 24-hour sampling period caused storm sewer overflow of 49,000 gallons. The overflow lasted for about 1.5 hours and began during a two-hour period of rainfall.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     P. G. DeFazio                     A. F. Pennak  
     H. D. Fletcher-2                  Central Files

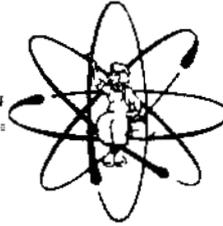
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332

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

1515

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: March 5, 1976

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 108 mg/l

Remarks: Rainfall during the sampling period caused a storm sewer overflow of 42,000 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
P. G. DeFazio                        A. F. Pennak  
H. D. Fletcher-2                      Central Files

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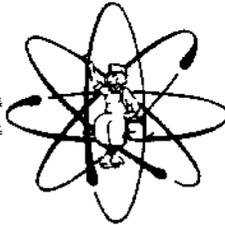
MAR 11 1976

303

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

1514

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: February 18, 1976

Permit discharge limit: Suspended solids daily maximum, 100 mg/l

Actual discharge measurement: 128 mg/l

Remarks: During the 24 hours covered by this sample slightly more than 1-inch of rain fell during a nine-hour period. The resulting heavy run-off caused a storm sewer overflow of 510,000 gallons.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

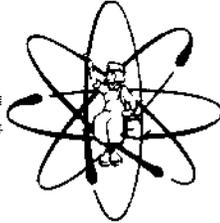
cc: M. W. Boback                      R. C. Heatherton  
     P. G. DeFazio                     A. F. Pennak  
     H. D. Fletcher-2                  Central Files

1115480

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

1513

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: February 16, 1976

Permit discharge limit: Oil and grease daily maximum, 15 mg/l

Actual discharge measurement: 18 mg/l

Remarks: There was no known spill or discharge of organic material. Total outfall volume represented by this sample was 33,000 gallons. During February, the total flow at 002 was 742,000 gallons and the monthly flow-weighted average concentration of oil and grease was only 3.8 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     P. G. DeFazio                     A. F. Pennak  
     H. D. Fletcher-2                  Central Files

1115481

303

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

1512

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: February 15, 1976

Permit discharge limit: Oil & grease daily maximum, 15 mg/l

Actual discharge measurement: 18 mg/l

Remarks: There was no known spill or discharge of organic material. Total outfall volume represented by this sample was 24,000 gallons. During February, the total flow at 002 was 742,000 gallons and the monthly flow-weighted average concentration of oil and grease was only 3.8 mg/l.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "S. F. Audia". The signature is fluid and cursive.

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
     P. G. DeFazio                     A. F. Pennak  
     H. D. Fletcher-2                 Central Files

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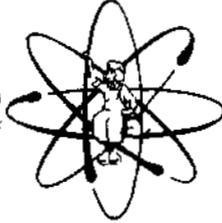
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MAR 10 1976

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

1507

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: C01, Manhole-175

Sampling time or period: Month of February

Permit discharge limit: Iron daily average, 1.2 mg/l

Actual discharge measurement: 2.2 mg/l

Remarks: As required by the permit, one 24-hr. sample from point C01 (Manhole-175) was analyzed for iron. The result, 2.2 mg/l, was within the permit daily maximum of 3.0 mg/l but above the permit daily average of 1.2 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback                      R. C. Heatherton  
P. G. DeFazio                        A. F. Pennak  
H. D. Fletcher-2                      Central Files

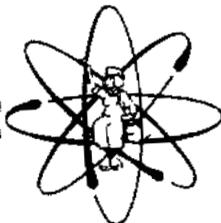
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A PRIME CONTRACTOR FOR THE U. S. ATOMIC ENERGY COMMISSION

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

1508

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175

Sampling time or period: Month of February

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l

Actual discharge measurement: 121 mg/l

Remarks: Four weekly samples were analyzed for ammonia nitrogen during the month. All were above 75 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

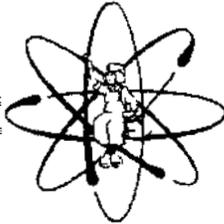
cc: M. W. Boback                    R. C. Heatherton  
     P. G. DeFazio                    A. F. Pennak  
     H. D. Fletcher-2                Central Files

1115484

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 11 1976

1511

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall

Sampling time or period: Month of February

Permit discharge limit: Suspended solids daily average, 30 mg/l

Actual discharge measurement: 114 mg/l

Remarks: During February, storm sewer overflow occurred on seven days. Except for one day, the suspended solids concentration was always above the permit average of 30 mg/l.

Sincerely yours,

S. F. Audia  
Manager

MWB/dld

cc: M. W. Boback R. C. Heatherton  
P. G. DeFazio A. F. Pennak  
H. D. Fletcher-2 Central Files

1115485

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N. L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

MAR 4 1976

1373

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: Sample dated 2/19/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 211 mg/l.

Remarks: During the sampling period there was 1.5 hours of light rain. Total volume of the overflow was 16,000 gallons.

Sincerely yours,

  
S. F. Audia  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

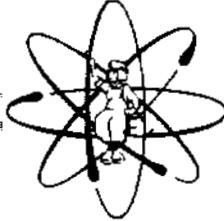
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NATIONAL LEAD COMPANY OF OHIO

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P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 18 1976

1051

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: Sample dated 2/17/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 403 mg/l.

Remarks: Less than 0.1 inch of rain during the sampling period  
caused a total storm sewer overflow of 13,440 gallons.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

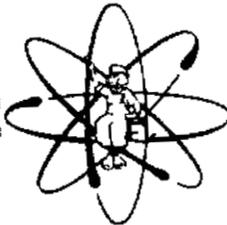
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NATIONAL LEAD COMPANY OF OHIO

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P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 17 1976

1026

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample dated 2/11/76.

Permit discharge limit: Ammonia nitrogen daily maximum, 200 mg/l.

Actual discharge measurement: 213 mg/l.

Remarks: There were no known unusual occurrences which might have caused an ammonia increase.

Sincerely yours,

A handwritten signature in cursive script that reads "C. R. Chapman".

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115488

210

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 12 1976

959

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: CC2, Storm Sewer Outfall.

Sampling time or period: Month of January, 1976.

Permit discharge limit: Suspended solids daily average, 30 mg/l.

Actual discharge measurement: 182 mg/l.

Remarks: Seven outfall samples were analyzed for suspended solids during January. Results ranged from 17 mg/l to 342 mg/l. Only one result (17 mg/l) was less than the daily average limit of 30 mg/l.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/dld

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak  
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JAN 13 1976

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A PRIME CONTRACTOR FOR THE U. S. ATOMIC ENERGY COMMISSION

200

NATIONAL LEAD COMPANY OF OHIO

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P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 12 1976

958

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH CCC9580

Outfall number and name: C01, Manhole-175.

Sampling time or period: Month of January, 1976.

Permit discharge limit: Iron daily average, 1.2 mg/l.

Actual discharge measurement: 4.6 mg/l.

Remarks: During the month eleven Manhole-175 samples were analyzed for iron, with results ranging from 0.6 mg/l to 11 mg/l. Only two results were less than the daily average limit of 1.2 mg/l.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MMB:eld

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher-2

R. C. Heatherton  
A. F. Pennak  
Central Files

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RECEIVED

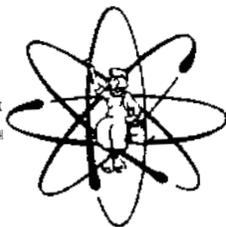
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1115490

NATIONAL LEAD COMPANY OF OHIO

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P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 1 1976

908

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 8:26 a.m., 1/30/76

Permit discharge limit: Daily grab pH, 6.5 - 10.0.

Actual discharge measurement: 10.2.

Remarks: This pH is probably due to a flow of treated and filtered production waste. A pH of 9.3 was found in the 24-hour sample which ended when this grab pH was taken.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115491



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

February 18, 1976

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
U. S. Environmental Protection Agency  
Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

VIOLATIONS - NPDES PERMITS OH0006092 AND OH0009580

Attached are five noncompliance reports for various violations that have occurred recently at ERDA's Portsmouth Plant (enclosure 1). The pH of the discharge from the North Holding Pond (Outfall 009) is expected to be significantly higher than 8.5 most of the time. 8.5 was the upper pH range that became effective for this discharge point on December 1, 1975. These violations and the associated problem of high pH effluents at several discharge points at Portsmouth were recently discussed with Messrs. Stethers and Bernstein of Region V, EPA.

The high pH from Outfall 008 is not expected to be a recurring problem, as the old softening lagoons (006, 007, and 008) are now used only for backup for the new lagoon (005).

Enclosure 2 contains eleven noncompliance reports for violations that have recently occurred at the Feed Materials Production Center at Fernald. Eight of the violations deal with the high iron concentrations that have been observed at Outfall 001. The required measurement frequency for iron at this discharge is monthly. The violation that occurred on January 7, 1976, was the sample that fulfilled this monitoring frequency requirement. All other violations were the result of additional analysis done as part of an effort to determine the duration and cause of the high iron concentrations. Of eleven additional analyses for iron during the month, seven were found to exceed a concentration of 3.0 mg/l, the daily maximum limitation. Investigation of this problem will continue. However, it has been determined that coal pile drainage is probably the source of the iron, and a special sampling program for this discharge has been initiated. For this reason, multiple violations of the iron limit at Outfall 001 will probably not be reported during February. ERDA will keep EPA informed of the status of this problem and any mitigating actions that might be taken.



COPY

1115492

February 18, 1976

The other violations reported for Portsmouth involve continuing problems that have been discussed recently with EPA representatives, and, in previous correspondence, on several occasions.

Parts I., C., 1 - Schedule of Compliance Reports

Due to an oversight, ERDA-ORO neglected to submit any information relative to the "Final Funding" reports that were due for Portsmouth on January 1, 1976, and Fernald on February 1, 1976. In previous correspondence, ERDA indicated that planned reductions in production at Fernald would probably allow the July 1, 1977 standards to be met without any additional pollution control facilities (Travis to MacDonald, August 13, 1975).

With regard to funding for the Portsmouth projects, no new information will be available until final approval of the ERDA budgets for fiscal years 1976-A and 1977. It is expected that the projects outlined in the preliminary funding report submitted to EPA on November 4, 1975, will clear all ERDA internal budget review. The Office of Management and Budget will then review the ERDA budget within the context of the total Federal Budget. Final approval is contingent on passage of the ERDA appropriations and authorization bills by Congress and the President's signature (or an overriding vote in Congress of a Presidential veto). Any significant reduction in the amount of funding allocated to ERDA for General Plant Projects (GPP) could have the effect of delaying pollution abatement projects. GPP projects are, by definition, unspecified as to purpose and cost in the ERDA budget breakdown. A GPP project must be less than \$750,000 and completely funded in a single fiscal year. Most pollution abatement GPP projects, especially those associated with NPDES requirements, are currently of relatively high priority for ERDA facilities. Barring any drastic cuts in GPP requests or large overruns, ERDA-ORO believes that the current NPDES budget strategy is the most expedient

Mr. Don Wallgren

- 3 -

February 18, 1976

that already contained in the progress report (preliminary plans) submitted to EPA, Region V, on September 15, 1975.

Sincerely,



J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. NPDES Noncompliance Reports for Portsmouth (5)
2. NPDES Noncompliance Reports for Fernald (11)

cc w/encl. 2:

Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45402

cc w/encl. 1:

Mr. Fred Klingelhafer, w/  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

cc w/encls. 1&2:

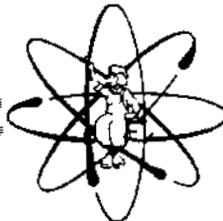
Mr. Howard Stethers  
U. S. Environmental Protection Agency  
Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

1115494

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 3 1976

769

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample dated 1/27/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 11 mg/l.

Remarks: This extra analysis was made as part of an effort to determine the duration and cause of high iron concentrations previously reported.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

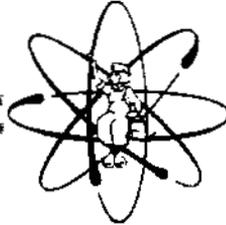
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#160  
FEB 9 1976

NATIONAL LEAD COMPANY OF OHIO

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P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 3 1976

754

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample dated 1/12/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 8.3 mg/l.

Remarks: This extra analysis was made as part of an effort to determine the duration and cause of high iron concentrations previously reported.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115496

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 3 1976

765

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample dated 1/16/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 4.9 mg/l.

Remarks: This extra analysis was made as part of an effort to determine the duration and cause of high iron concentrations previously reported.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

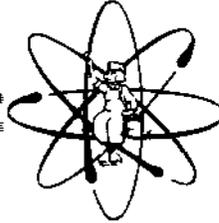
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# NATIONAL LEAD COMPANY OF OHIO

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P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 3 1976

766

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 8:00 a.m., 1/20/76.

Permit discharge limit: Daily grab pH, 6.5 - 10.0.

Actual discharge measurement: 10.2.

Remarks: The slightly high pH may have been due to a discharge of treated and filtered production waste occurring at the time the grab pH was taken. A pH of 9.2 was found in the 24-hour sample which ended when the grab was taken.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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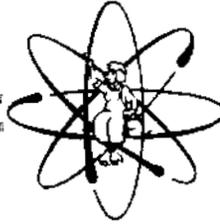
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#160

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

FEB 3 1976

767

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample dated 1/25/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 11 mg/l.

Remarks: This extra analysis was made as part of an effort to determine the duration and cause of high iron concentrations previously reported.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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FEB 9 1976

#160

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

758

FEB 3 1976

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour sampling period ending 7:50 a.m.,  
1/26/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 149 mg/l.

Remarks: Rain occurred during 21 hours of the sampling period and total precipitation was about 0.8 inch. An overflow to the outfall started at 9:20 a.m., 1/25/76, and continued to the end of the sampling period. Total outfall volume was 841,900 gallons.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

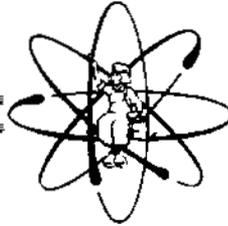
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#160  
FEB 9 1976

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

598

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample collected 8:10 a. m., 1/9/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 4.7 mg/l.

Remarks: No unusual occurrences are known which could have resulted in an increase in the iron concentration. Efforts are being made to determine the cause.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/fb

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2

R. C. Heatherton  
A. F. Pennák

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1115501

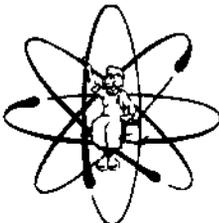
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120

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 23 1976

596

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample collected 7:55 a. m., 1/7/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 4.0 mg/l.

Remarks: No unusual occurrences are known which could have resulted in an increase in the iron concentration. Efforts are being made to determine the cause.

Sincerely yours,

A handwritten signature in cursive script that reads "C. R. Chapman".

C. R. Chapman  
Manager

MWB/fb

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2

R. C. Heatherton  
A. F. Pennak

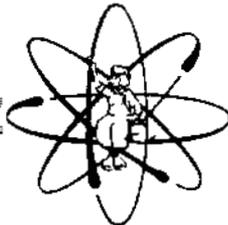
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A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 10 1976

597

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole 175.

Sampling time or period: 24-hour sample collected 8:10 a. m., 1/8/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 4.5 mg/l.

Remarks: No unusual occurrences are known which could have resulted in an increase in the iron concentration. Efforts are being made to determine the cause.

Sincerely yours,

C. R. Chapman  
Manager

MWB/fb

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2

R. C. Heatherton  
A. F. Pennak

111550 } Central Files

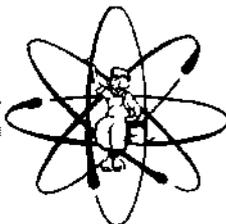
RECEIVED

120

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 11 1976

595

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole 175.

Sampling time or period: 24-hour sample collected 7:55 a.m., 1/6/76.

Permit discharge limit: Iron daily maximum, 3.0 mg/l.

Actual discharge measurement: 7.3 mg/l.

Remarks: No unusual occurrences are known which could have resulted in an increase in the iron concentration. Efforts are being made to determine the cause.

Sincerely yours,

C. R. Chapman  
Manager

MWB/fb

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2

R. C. Heatherton  
A. F. Pennak

Central Files

1115504

126

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 22 1976

496

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour sampling period ending 8:00 a. m., 1/14/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 342 mg/l.

Remarks: A thunderstorm, accompanied by hail and wind gusts of 60 mph, caused heavy silt-laden run-off which exceeded the lift station capacity. Total overflow to the storm sewer outfall was 392,640 gallons.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/fb

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2

R. C. Heatherton  
A. F. Pennak

Central Files

35

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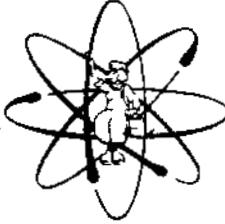
1115505

A PRIME CONTRACTOR FOR THE U. S. ATOMIC ENERGY COMMISSION

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 8 1976

217

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour sample ending 8:00 a.m., 1/1/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 101 mg/l.

Remarks: About 0.3-inch of rain fell throughout 13.5 hours of the sampling period. The volume of storm sewer overflow was 233,800 gallons.

Sincerely yours,

A handwritten signature in cursive script that reads "C. R. Chapman".

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115506

SEARCHED  
SERIALIZED

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 8 1976

216

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour sample ending 7:45 a.m., 12/31/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 166 mg/l.

Remarks: Four hours of rain fell during the sampling period,  
causing a storm sewer overflow of 40,000 gallons.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

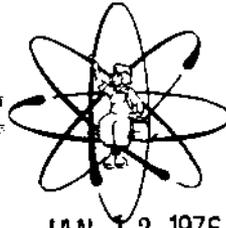
1115507

29

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 12 1976

248

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hr. sampling period ending 7:45 a.m.,  
12/31/75.

Permit discharge limit: pH range 6.5 - 8.5.

Actual discharge measurement: pH 9.5.

Remarks: Cause of the higher pH is unknown.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

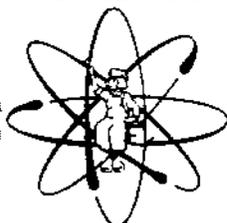
1115508

38

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 12 1976

247

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hr. sampling period ending 7:50 a.m.,  
12/15/75.

Permit discharge limit: pH range, 6.5 - 8.5.

Actual discharge measurement: pH 8.6.

Remarks: Cause of the higher pH is unknown.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115509

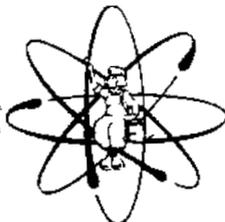
RECEIVED

38

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 12 1976

245

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 8:10 a.m., 12/4/75.

Permit discharge limit: Daily grab pH, 6.5 - 10.0.

Actual discharge measurement: pH 10.1.

Remarks: Cause of the high pH is unknown. The pH in the 24-hour sample ending at the same time was 9.4.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

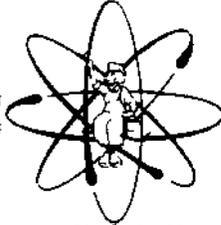
Central Files

1115510

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 12 1976

244

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of December, 1975.

Permit discharge limit: Ammonia nitrogen daily average = 75 mg/l.

Actual discharge measurement: 103 mg/l.

Remarks: Four samples were analyzed for ammonia nitrogen during December. Results were 74, 79, 90, and 156 mg/l.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

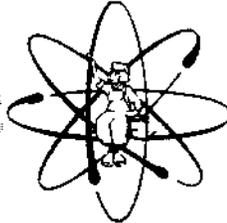
Central Files

1115511

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 12 1976

245

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of December.

Permit discharge limit: Suspended solids daily average, 30 mg/ℓ.

Actual discharge measurement: 139 mg/ℓ.

Remarks: Nine storm sewer outfall flows occurred in December.  
Suspended solids in all nine flow samples exceeded the  
average of 30 mg/ℓ.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

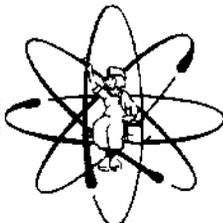
1115512

Fletcher

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 16 1976

376

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour sample ending 7:45 a.m., 1/12/76.

Permit discharge limit: Chloride daily maximum, 450 mg/l.

Actual discharge measurement: 586 mg/l.

Remarks: No unusual operating conditions occurred during the sampling period. Chloride salt used for ice control may have been washed off pads and plant roads by precipitation run-off. A high chloride concentration (774 mg/l) was found in the Storm Sewer system on 1/12/76.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

1115519 Central Files

*Litwin*

NATIONAL LEAD COMPANY OF OHIO  
A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

JAN 16 1976

377

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour period ending 8:15 a.m., 1/9/76.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 116 mg/l.

Remarks: Low temperature caused freezing of a float-operated switch at the Storm Sewer Lift Station. As a result, the lift pumps did not operate and water overflowed to the outfall. Total volume was 21,200 gallons. Since there was no rainfall during the sampling period, the suspended solids resulted from normal drainage.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

- cc: M. W. Boback
- P. G. DeFazio
- H. D. Fletcher - 2
- R. C. Heatherton
- A. F. Pennak

1115514

Central Files

56

Mr. Don Wallgren, EPA

2

January 28, 1976

cc w/Encls 2 and 4:  
Mr. Craig Cooperrider  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45402

*o/p*  
cc w/Encls. 3 and 4:  
Mr. Howard Stethers  
U. S. Environmental Protection Agency  
Region V  
Chicago, Illinois 60604

cc w/Encls. 1 and 3:  
Mr. Fred Klingelhafer  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

bcc w/o encl:  
C. R. Chapman, NLO  
H. D. Fletcher, ORO  
A. A. Schoen, DOS-HQ  
C. D. Tabor, GAT

1115515

OFFICE	EP Branch					
SURNAME	<i>[Signature]</i> Alexander: kb				EP: 3	
DATE	1/28/76				MPDES - Jan	

January 28, 1976

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
U. S. Environmental Protection Agency  
Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

NPDES DISCHARGE MONITORING REPORTS, FOURTH QUARTER 1975

Enclosed are the required quarterly data forms (EPA-3320-1) for ERDA's Feed Materials Production Plant at Fernald, Ohio (OH0009530) and the Gaseous Diffusion Plant at Portsmouth, Ohio (OH0008092). Review of the monitoring reports reveal no noncompliant situations which have not previously been reported to your office by phone or by letter.

Also enclosed are two sets of noncompliance reports ERDA-ORO has received recently from Fernald and Portsmouth (enclosures 3 and 4). As was discussed in my January 7 letter to you on this subject, ERDA-ORO is unable to notify EPA in writing within five days of a violation. However, Region V is notified by phone within five days of our receiving notification of a violation and then routinely receives follow-up reports in writing.

Sincerely,

Original Signed by

J. F. Wing

J. F. Wing, Chief

Environmental Protection Branch

Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. Form EPA 3320-1 for PORT
2. Form EPA 3320-1 for FMPC
3. Noncompliance Rpts for PORT
4. Noncompliance Rpts for FMPC

See Page 2 for CC's

OFFICE →	EP Branch				
SURNAME →	Alexander:kb				
DATE →	1/28/76				

1115519



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 482-6001

January 7, 1976

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
U. S. Environmental Protection Agency  
Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

VIOLATIONS - NPDES PERMITS OH0006092 AND OH0009580

Attached are six noncompliance reports for six violations ERDA has recently received from Portsmouth (Enclosure 1) and twelve noncompliance reports for twelve violations at Fernald (Enclosure 2). All of these were discussed by phone with Howard Stethers within five days of ERDA's receiving verbal notification from the environmental coordinators at the plants. This procedure for reporting violations has been followed since ERDA-ORO received the permits for the Region V facilities in the summer of 1975 and to our knowledge is acceptable to EPA. Please note that ERDA is not able to notify EPA by letter within five days of our being informed of violations at the plants using the current communication channels. This need was stressed in a form letter from your Branch dated December 18, 1975. Please notify me (FTS 850-4175) immediately if the present reporting procedure is inadequate. With regard to the requirements for reporting to the states, the Environmental Protection Branch does supply the specified regional Ohio EPA offices with copies of all correspondence related to NPDES reporting requirements.

Sincerely,

*for* *H.W. Libbitt*

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

See page 2 for enclosures and cc's

1115511



COPY

Mr. Don Wallgren

- 2 -

January 7, 1976

**Enclosures:**

1. NPDES Noncompliance Reports for Portsmouth (6)
2. NPDES Noncompliance Reports for Fernald (10)

cc: Mr. Fred Klingelhafer, w/encl. 1  
Ohio EPA, Southeast District  
Route 3, Box 603  
Logan, Ohio 43138

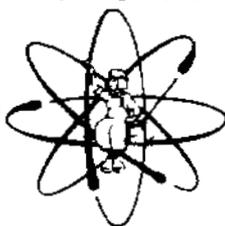
Mr. Craig Copperrider, w/encl. 2  
Ohio EPA, Southwest District  
7 East Fourth Street  
Dayton, Ohio 45402

1115518

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 19 1975

6871

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

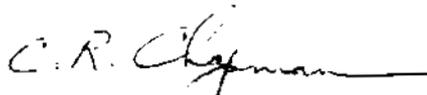
Sampling time or period: 24-hour sampling period ending 7:50 a.m.,  
12/15/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 804 mg/l.

Remarks: From 5:30 a.m. to 3:00 p.m., 12/15/75, rainfall was 0.9 inch. Most of this occurred during a heavy downpour occurring between 5:30 a.m. and 8:00 a.m. Solids in the sample appeared to be mostly from run-off silt. Total storm sewer overflow was 128,610 gallons.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115519

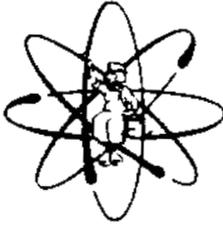
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4

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 19 1975

8870

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

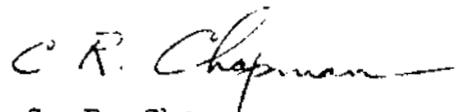
Sampling time or period: 24-hour continuous sample ending 8:00 a.m.,  
12/11/75

Permit discharge limit: Fluoride daily maximum, 15 mg/l.

Actual discharge measurement: 15.9 mg/l.

Remarks: The increase in fluoride concentration may be due to recent Refinery processing of magnesium fluoride slag or the processing of miscellaneous fluoride containing scrap.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115520

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 19 1975

6072

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

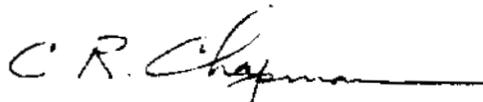
Sampling time or period: 24-hour sampling period ending 8:00 a.m.,  
12/13/75

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 219 mg/l.

Remarks: From 5:30 p.m. to 7:00 p.m., 12/12/75, rainfall was  
0.11 inches. This rain caused a storm sewer overflow  
from 6:30 p.m. to 8:00 p.m. Total overflow was  
35,328 gallons.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

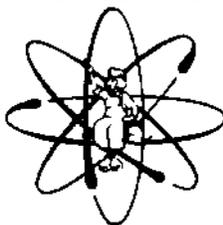
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1115521

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

6549

DEC 12 1975

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of November, 1975.

Permit discharge limit: Dissolved solids daily average, 9,000 mg/l.

Actual discharge measurement: 10,340 mg/l.

Remarks: During the month there were 18 days on which the daily concentration exceeded 9,000 mg/l. The maximum reached was 20,040 mg/l. As a consequence, the daily weighted average for the month exceeded the permit limit by 15%.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

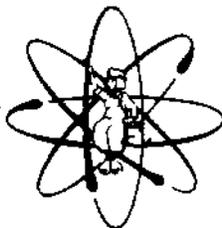
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1115522

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

NOV 13 1975

6551

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of November, 1975.

Permit discharge limit: Ammonia nitrogen daily average, 75 mg/l.

Actual discharge measurement: 152 mg/l.

Remarks: Four daily samples (one per week) were analyzed for ammonia nitrogen during the month. The range of the four results was 123 - 172 mg/l.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "C. R. Chapman".

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

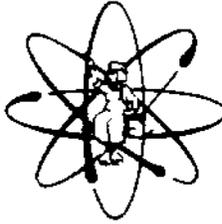
Central Files

1115523

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 12 1975

6552

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of November, 1975.

Permit discharge limit: Suspended solids daily average, 30 mg/l.

Actual discharge measurement: 92 mg/l.

Remarks: Three outfall samples were analyzed for suspended solids during November. The highest concentration (96 mg/l) was found in the sample from the greatest flow (312,000 gal.). The lowest result was 18 mg/l, but the total flow was only 4,000 gallons.

Sincerely yours,

*for* C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

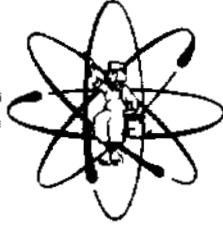
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1115524

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 12 1975

6550

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour continuous sample collected  
0800 hours on 12/11/75.

Permit discharge limit: Dissolved solids daily maximum 18,000 mg/l.

Actual discharge measurement: 18,610 mg/l.

Remarks: Dissolved solids in the General Sump effluent were  
40,000 mg/l. The Sump effluent flow was 210,000 gal-  
lons or 50% of the total flow of 520,000 gallons.

Sincerely yours,

C. R. Chapman  
Manager

KNR/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

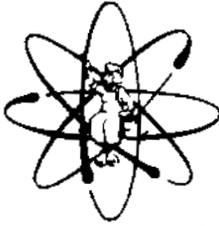
1115525

Fletcher

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 9 1975

6444

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 24-hour period ending 7:45 a.m., 12/6/75.

Permit discharge limit: Suspended solids limit, 100 mg/l.

Actual discharge measurement: 158 mg/l.

Remarks: During the sampling period rain occurred in the period preceding the sampling. The solids in the sample are orange in color and floc-like. They are probably ferric hydroxide from the coal pile drainage neutralized in the Storm Sewer. The storm sewer outfall during this period was 27,400 gallons.

Sincerely yours,

C. R. Chapman  
Manager

KNR/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

111552b

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 4 1975

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

6200

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 24-hour period ending 7:45 a.m., 12/1/75.

Permit discharge limit: Suspended solids limit, 100 mg/l.

Actual discharge measurement: 117 mg/l.

Remarks: During the sampling period, 0.58 inches of rain occurred in a seven-hour period. This precipitation caused a storm sewer overflow of 52,000 gallons. A sample collected during the first 21,200 gallons contained only 60 mg/l suspended solids but the later flow contained 156 mg/l. Solids in the second sample appeared similar to a floc-like precipitation of ferric hydroxide and may have resulted from the neutralization of coal-pile drainage.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

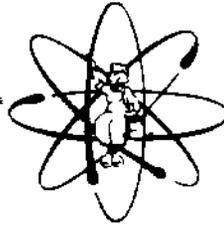
MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115527

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

NOV 17 1975

6066

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour continuous sample collected 7:45 a.m.,  
11/12/75.

Permit discharge limit: Dissolved solids daily maximum = 18,000 mg/l.

Actual discharge measurement: 20,040 mg/l.

Remarks: Dissolved solids in the General Sump effluent averaged 40,000 mg/l during the period covered by the MH-175 sample. This concentration was unusually high and the volume of other diluting streams was not enough to reduce the final concentration to the permit limit.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

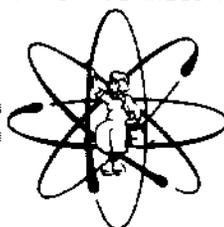
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1115528

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 31 1975

52

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour sample ending 7:50 a.m., 12/26/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 103 mg/l.

Remarks: 0.52-inch of rain fell during an all-day drizzle. Total outfall flow was 335,520 gallons.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115529

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

DEC 31 1975

52

Mr. H. Doran Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour sample ending 7:50 a.m., 12/27/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 107 mg/l.

Remarks: Light rain caused an overflow to the outfall lasting 1-1/4 hours. Total volume was 6,480 gallons.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

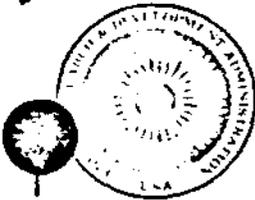
cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115530

A PRIME CONTRACTOR FOR THE U. S. ATOMIC ENERGY COMMISSION

# 1439



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483 8011

November 20, 1975

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

NPDES PERMIT VIOLATIONS: PERMITS OH0006092 AND OH0009580

Attached are five noncompliance reports for violations that have occurred at the Portsmouth Gaseous Diffusion Plant. The high suspended solids in the East Drainage Ditch (Outfall 001) may recur with comparable heavy rains, which will be rather infrequent. The low pH in the South Holding Pond (Outfall 002) will be a continuing problem through the winter months. The other two violations are not expected to be future problems.

Also attached are three noncompliance reports for the Feed Materials Production Center at Fernald. These violations are related to specific problems with Fernald's permit which have been discussed with Region V in the past, both in correspondence and by phone.

All of these violations have been previously reported to Mr. Howard Stethers by phone.

Sincerely,

J. F. Wing, Chief  
Environmental Protection Branch  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

1. Rpt. of Noncompliance with NPDES Permit  
No. OH0006092 for GAT (5 rpts)
2. Rpt of Noncompliance with NPDES Permit  
No. OH0009580 from NLO (3 rpts)

See page 2 for distribution



1115531

Mr. Don Wallgren

- 2 -

November 20, 1975

cc: Mr. Fred Klingelhafer, w/encl. 1  
Ohio EPA, Southeast District

Mr. Craig Cooperrider, w/encl. 2  
Ohio EPA, Southwest District

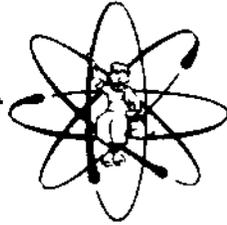
Mr. Howard Stethers  
USEPA, Region V, Chicago

cc w/o encls:

C. R. Chapman, NLO  
H. D. Fletcher, UEO, ORO  
A. A. Schoen, DOS-HQ  
C. D. Tabor, GAT

1115532

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

NOV 11 1975

5961

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: Month of October, 1975.

Permit discharge limit: Suspended solids daily average  $\leq 30$  mg/l.

Actual discharge measurement: 67 mg/l.

Remarks: During the month of October flows occurred at the outfall on 10 days. Suspended solids exceeded 30 mg/l on eight of those days. The total flow for these eight days was 1.8 million gallons. On the two other days when an outfall flow occurred, the suspended solids concentrations were 14 mg/l and 20 mg/l but the total flow was only 0.14 million gallons.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

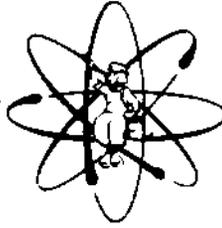
MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115533

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

NOV 11 1975

5962

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 24-hour continuous sample collected 10/30/75.

Permit discharge limit: pH range shall be 6.5 - 8.5.

Actual discharge measurement: pH 8.8.

Remarks: It is believed that the high pH average resulted from efforts to neutralize acidic drainage from the coal pile.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

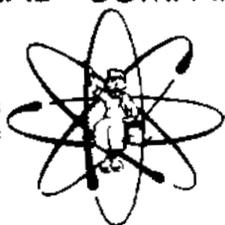
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1115534

NATIONAL LEAD COMPANY OF OHIO

5775

P. O. BOX 39158



CINCINNATI, OHIO 45239

OCT 30 1975

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole 175.

Sampling time or period: 24-hour continuous sample collected, 10/23/75.

Permit discharge limit: Dissolved solids daily maximum, 18,000 mg/l.

Actual discharge measurement: 18,280 mg/l.

Remarks: Routine operations were conducted during the day and there is no particular reason for the higher solids. Dissolved solids in the General Sump effluent were 36,000 mg/l and the volume of other diluting streams was not enough to drop the concentration in the final effluent under 18,000 mg/l.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

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1115535



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

November 4, 1975

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

NPDES PERMIT VIOLATIONS: PERMITS OH0006092 and OH0009580

Attached are six noncompliance reports dealing with seven violations that have occurred at the Portsmouth Gaseous Diffusion Plant. With regard to the dissolved solids monthly average violation at Outfall 004 for August, please note that similar violations of this limitation were not found in July or September, but as ERDA has indicated in previous correspondence, it is felt that the limitation of 3000 mg/l is too low to allow for normal operational fluctuation that has no real environmental consequence. With the exception of the low pH at Outfall 002, none of the other violations are expected to be recurring problems.

Also attached are eight noncompliance reports for the Feed Materials Production Center at Fernald. These violations are related to specific problems with Fernald's permit which ERDA has discussed with Region V in the past, both in correspondence and by phone.

All of these violations have been previously reported to Mr. Howard Stethers. We regret the delay in reporting the three daily average violations for the month of July at Portsmouth. ERDA and Goodyear Atomic Corporation have taken steps to expedite violation reporting communications so that future violations can be reported in a manner timely with the NPDES five-day reporting period.

Sincerely,

  
William H. Travis, Director  
Safety & Environmental Control Division

OSE:JKA

See page 2 for enclosures  
and distribution



COPY 1115536

Mr. Don Wallgren

- 2 -

November 4, 1975

Enclosures:

1. Rpt. of Noncompliance with  
NPDES Permit No. OH0006092  
for GAT (6 rpts)
2. Rpt. of Noncompliance with  
NPDES Permit No. OH0009580  
for FMPC (8 rpts)

cc w/encl. 1:

Mr. Fred Klingelhafer  
Ohio EPA  
Southeast District Office  
Route 3, Box 603  
Logan, Ohio 43138

cc w/encl. 2:

Mr. Craig Cooperrider  
Ohio EPA  
Southwest District Office  
7 East Fourth Street  
Dayton, Ohio 45402

1115537

NATIONAL LEAD COMPANY OF OHIO



P. O. BOX 39158

CINCINNATI, OHIO 45239

OCT 23 1975

5671

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

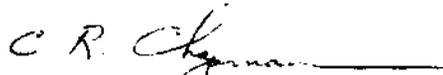
Sampling time or period: 24-hour composite ending 7:50 a.m., 10/19/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 114 mg/l.

Remarks: An all-day drizzle on 10/18/75 resulted in 0.47 inches of rain. This resulted in a total overflow to the storm sewer outfall of 84,960 gallons during the periods 8:00 a.m. - 11:45 a.m. and 5:00 p.m. - 11:15 p.m. on 10/18/75.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

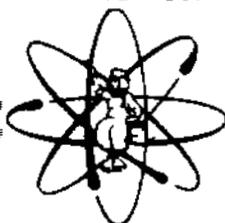
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1115538

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 20 1975

5584

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

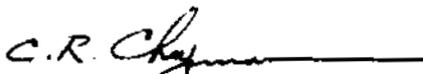
Sampling time or period: 24-hour composite ending at 7:50 a.m.,  
10/16/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 106 mg/l.

Remarks: On 10/15/75, 0.23 inch of rain occurred between 5:00 p.m.  
and 6:30 p.m. Runoff caused a storm sewer overflow of  
65,040 gallons between 6:35 p.m. and 8:30 p.m.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2,  
R. C. Heatherton  
A. F. Pennak

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1115539

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 17 1975

5544

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

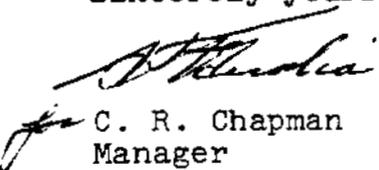
Sampling time or period: 24-hour composite collected 8:00 a.m., 10/6/75.

Permit discharge limit: Dissolved solids daily maximum, 18,000 mg/l.

Actual discharge measurement: 18,560 mg/l.

Remarks: The noncompliance is probably due to a reduction in the amount of water from sources other than Refinery operations. The 24-hour period covered by this sample starts at 8:00 a.m. on a Sunday (10/5/75), a time when there is a decrease in non-Refinery waste water. This non-Refinery water has a lower dissolved solids content. When it is present, it reduces the average dissolved solids content of the final effluent. When its volume decreases, the dissolved solids content of the final effluent increases correspondingly.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

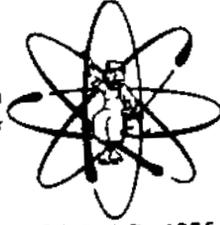
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1115540

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 17 1975

5545

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

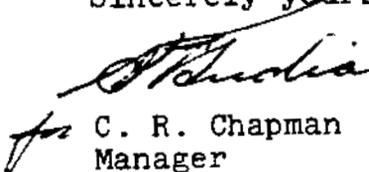
Sampling time or period: 24-hour composite collected 7:50 a.m.,  
10/10/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 132 mg/l.

Remarks: There was no rainfall during the 24-hour period covered by this sample but 1.05 inches of rain did occur in the two previous days. Total flow to the outfall was only 3176 gallons, from 10:00 a.m. to 10:45 a.m. on 10/9/75.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

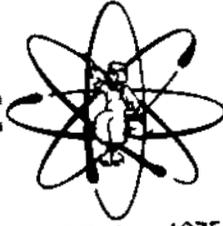
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1115541

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 10 1975

5446

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 24-hour composite ending at 7:55 a.m.,  
10/8/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 312 mg/l.

Remarks: A total of 1.31 inches of rain fell during the period from  
4:30 a.m. to 7:00 p.m. on 10/8/75. In the interval from  
4:30 a.m. to 7:55 a.m., when the sample was collected, a  
flow of 6700 gallons went to the outfall.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

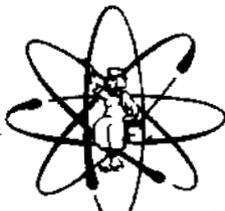
1115542

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158

CINCINNATI, OHIO 45239



PHONE: AREA CODE: 513-738-1151

OCT 8 1975

5402

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of September, 1975.

Permit discharge limit: Dissolved solids daily average  $\leq 9000$  mg/l.

Actual discharge measurement: 10250 mg/l.

Remarks: On 16 days during September the daily 24-hour composite sample from MH-175 had a dissolved solids concentration greater than 9000 mg/l. During the remaining 14 days of September, the concentration was less than 9000 mg/l, but not low enough to bring the average within the permit level.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

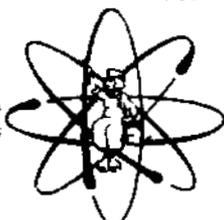
Central Files

1115543

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 8 1975

5403

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: Month of September, 1975.

Permit discharge limit: Suspended solids daily average  $\leq 30$  mg/l.

Actual discharge measurement: 141 mg/l.

Remarks: During September there were five storm sewer outfall samples analyzed for suspended solids. Four results were greater than 30 mg/l, causing the average to be well above the figure specified in the discharge permit.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

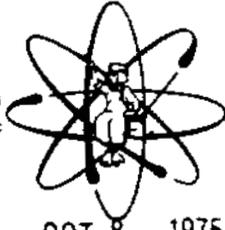
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1115544

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

OCT 8 1975

5401

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Month of September.

Permit discharge limit: Ammonia nitrogen daily average  $\leq 75$  mg/l.

Actual discharge measurement: 76 mg/l.

Remarks: Four 24-hour composites were analyzed for ammonia nitrogen during September. Although all results were within the daily maximum limit, two results were well above the daily average, causing the monthly figure to exceed the limit of 75 mg/l.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2  
R. C. Heatherton  
A. F. Pennak

Central Files

1115545



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

October 6, 1975

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

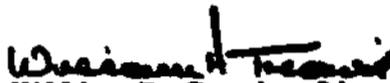
NPDES PERMIT VIOLATIONS: PERMIT OH0009580

Attached are six noncompliance reports received from the Feed Materials Production Center at Fernald. These violations have been previously reported by phone to Mr. Howard Stethers. The noncompliance report dated September 10, 1975, dealing with the dissolved solids monthly average for August, was inadvertently omitted from ERDA's transmittal of earlier violation reports dated September 15.

High suspended solids and low pH may continue to be problems for storm water runoff through Outfall 002. As was stated in our letter of September 15, there is concern that the daily maximum for dissolved solids at Outfall 001 may be set too low to allow for normal operating fluctuations. Similarly, the daily average limitation for dissolved solids appears also to be too low for average operating conditions and violation of this standard could prove to be a recurring problem.

None of the other violations are expected to be of future concern.

Sincerely,

  
William H. Travis, Director  
Safety & Environmental Control Division

OSE:JKA

Enclosures:  
As stated

cc w/encls:  
Craig Cooperrider, Ohio EPA



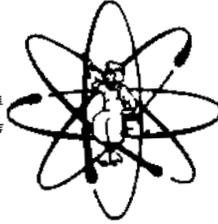
COPY

1115546

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 23 1975

Called 9/22

5107

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: 24-hour composite ending at 8:00 a.m.,  
9/19/75.

Permit discharge limit: pH range shall be 6.5 - 8.5.

Actual discharge measurement: pH 5.6.

Remarks: 0.47 inches of rain fell from midnight to 11:00 a.m. on  
9/18/75. Overflow at the storm sewer outfall began at  
7:50 a.m. and lasted until noon on 9/18/75. Total over-  
flow volume was  $0.127 \times 10^6$  gallons. Most likely cause  
of the low pH is acidic drainage from the coal storage  
area.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

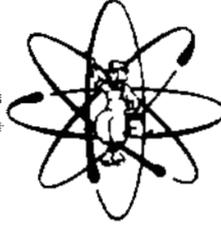
cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

1115547 Central Files

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

Called 9/22

SEP 23 1975

5108

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: Grab pH taken at 8:00 a.m., 9/19/75.

Permit discharge limit: pH range shall be 6.5 - 10.0.

Actual discharge measurement: pH 11.6.

Remarks: At the time that the sample was collected, the pH chart read 11.6. Known possible sources of high pH water were not being pumped to MH-175 at the time. pH of the 24-hour composite collected 8:00 a.m., 9/19/75, was 8.4.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

Central Files

1115548

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-736-1151

SEP 16 1975

called 9/7

4998

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

Sampling time or period: 24-hr. composite ending 8:05 a.m., 9/12/75.

Permit discharge limit: Suspended solids daily maximum, 100 mg/l.

Actual discharge measurement: 189 mg/l.

Remarks: A total of 3.06 inches of rain fell during the period from 6:30 a.m. to 6:15 p.m., 9/11/75. Most of the rain occurred from 3:30 p.m. to 7:45 p.m. The storm sewer outfall flow for the 24<sup>6</sup>hr. period ending 8:05 a.m., 9/12/75, was  $0.545 \times 10^6$  gallons.

Although surface soil is generally washed into the system by precipitation run-off, the high solids in this sample are believed due to drainage from the coal storage area. This drainage has a low pH and neutralization results in a precipitation of the dissolved solids. Neutralization occurs at one sump through which this drainage passes when, occasionally, lime is added to avoid pump corrosion due to the low pH. A natural neutralization routinely occurs as the low pH water mixes with run-off from other sections. This normal run-off generally has a pH range of 7-8.

Sincerely yours,

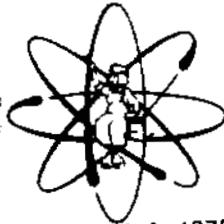
C. R. Chapman  
Manager

MWB/vvs  
1115549

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 16 1975

5010

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

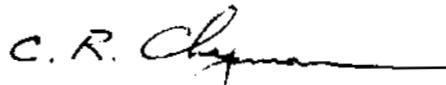
Sampling time or period: 24-hr. composite ending 8:00 a.m., 9/14/75.

Permit discharge limit: Dissolved solids daily maximum, 18,000 mg/l.

Actual discharge measurement: 22,130 mg/l.

Remarks: Rainfall on 9/13/75 caused a number of sumps to fill and they were pumped out to the General Sump. As a result, a record volume of water was discharged from the General Sump to Manhole-175. It is believed that the amount of dilution afforded by precipitation run-off was not enough to offset the increased quantity of high-dissolved solids sump water which had to be discharged during the 24-hr. period covered by the sample.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

Central files

1115550

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 15 1975

cc: ed. 217

4973

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

Sampling time or period: 24-hour composite ending at 9:50 a.m.,  
9/6/75.

Permit discharge limit: Fluoride daily maximum  $\leq 15$  mg/l.

Actual discharge measurement: 17.7 mg/l.

Remarks: Small leaks of nitric acid and ammonia occurred at the tank farm on 9/5/75. Nitric acid leaked from a faulty coupling on a tank truck and there was an ammonia leak in the tank farm piping. The trucking firm has repaired its coupling and we have corrected the tank farm leak. Although both leaks were minor, the acid and ammonia may have dissolved precipitated fluoride compounds from the tank farm limestone or sump.

Sincerely yours,

C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

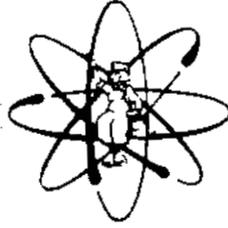
Central Files

1115551

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 10 1975

4920

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole-175.

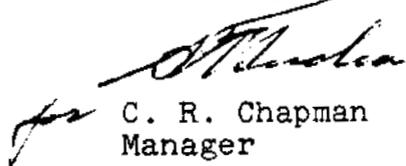
Sampling time or period: Month of August, 1975.

Permit discharge limit: Dissolved solids monthly average  $\leq 9000$  mg/l.

Actual discharge measurement: 9780 mg/l.

Remarks: For 18 days during August the daily composite sample from MH-175 had a dissolved solids concentration greater than 9000 mg/l. During the remaining 13 days, the concentration was less than 9000 mg/l, but not low enough to bring the average within the permit level.

Sincerely yours,

  
for C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

Central Files

1115552



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483-8611

September 15, 1975

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

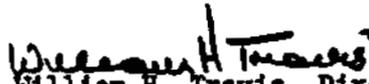
Dear Mr. Wallgren:

NPDES PERMIT VIOLATIONS: PERMIT OH 0009580

Attached are five noncompliance reports received from the Feed Materials Production Center at Fernald. These violations were reported by phone to Mr. Howard Stethers on September 8, 1975.

NLO personnel are looking into possible methods of reducing the concentrations of the pollutants at Outfall 001. There is some concern that the daily maximum limitation for dissolved solids and the daily average value for ammonia-nitrogen at Outfall 001 may have been inadvertently set too low at the time these discharge limitations were negotiated with EPA.

Sincerely,

  
William H. Travis, Director  
Safety & Environmental Control Division

OSE:JKA

Enclosures:

Ltrs., CRC to HDF, two letters  
dated Sept. 9 and three letters  
dated Sept. 8

cc w/encls:  
Mr. Craig Cooperrider, Ohio EPA

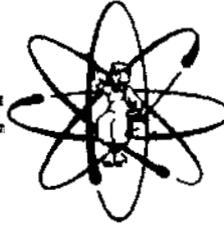


COPY 1115553

NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-728-1131

SEP 9 1975

4846

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

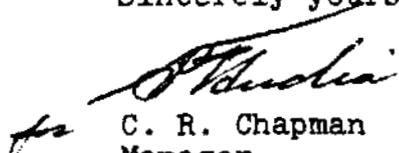
Sampling time or period: 24-hour composite collected 8/6/75.

Permit discharge limit: pH range shall be 6.5 - 8.5.

Actual discharge measurement: pH 8.7.

Remarks: During the 24-hour period covered by this sample, a total of 50,000 gallons of storm sewer water overflowed to the outfall. The out-of-compliance status of the pH value was not noted until a review of August data was made. The pH range for four subsequent flows during the month was 6.7 - 7.5.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

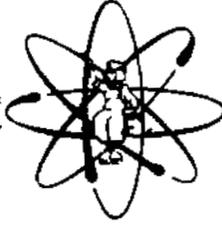
Central Files

1115554

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 9 1975

4845

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm sewer outfall.

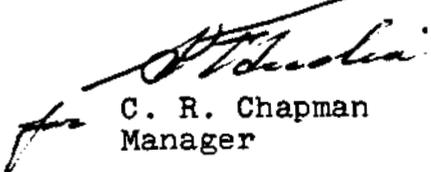
Sampling time or period: 24-hour composite collected 8/4/75.

Permit discharge limit: pH range shall be 6.5 - 8.5.

Actual discharge measurement: pH 8.8.

Remarks: During the 24-hour period covered by this sample, a total of 17,000 gallons of storm sewer water overflowed to the outfall. The out-of-compliance status of the pH value was not noted until a review of August data was made.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

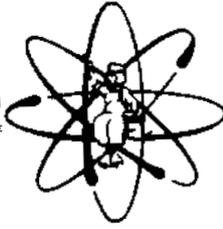
Central Files

1115555

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF NL INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 8 1975

4809

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole 175.

Sampling time or period: Month of August, 1975.

Permit discharge limit: Ammonia nitrogen daily average  $\leq 75$  mg/l.

Actual discharge measurement: 82 mg/l.

Remarks: Four samples were analyzed for ammonia during August. The highest concentration found was 145 mg/l. This value caused the flow-weighted average to exceed the permit specification. The flow-weighted average for the remaining three samples is 69 mg/l.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

Central Files

111555b

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 8 1975

4811

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 002, Storm Sewer Outfall.

Sampling time or period: Month of August, 1975.

Permit discharge limit: Suspended solids daily average  $\leq 30$  mg/l.

Actual discharge measurement: 105 mg/l.

Remarks: Brief periods of heavy precipitation run-off carry surface soil into the storm sewer. In addition, some of the solids may have been precipitated in the system when low-pH drainage water from the coal pile met a high-pH water unwittingly directed to the storm sewer. Piping changes have been made and the high-pH water is now sent to the General Sump.

Sincerely yours,

  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

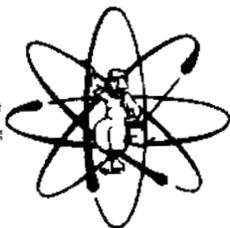
Central Files

1115557

# NATIONAL LEAD COMPANY OF OHIO

A SUBSIDIARY OF N.L. INDUSTRIES, INC.

P. O. BOX 39158



CINCINNATI, OHIO 45239

PHONE: AREA CODE: 513-738-1151

SEP 8 1975

4810

Mr. H. D. Fletcher, Director  
Uranium Enrichment Operations Division  
Oak Ridge Operations Office  
U. S. Energy Research & Development Administration  
P. O. Box E  
Oak Ridge, Tennessee 37830

Dear Mr. Fletcher:

REPORT OF NONCOMPLIANCE WITH NPDES PERMIT NO. OH 0009580

Outfall number and name: 001, Manhole 175.

Sampling time or period: 24-hour composite ending at 7:50 a.m., 8/24/75.

Permit discharge limit: Dissolved solids daily maximum  $\leq 18,000$  mg/l.

Actual discharge measurement: 22,597 mg/l.

Remarks: Unusually high dissolved solids occurred in the General Sump effluent. Also, this flow occurred during a weekend when there was an absence of a diluting effect of other waste streams which have a low concentration of dissolved solids.

Sincerely yours,

*C. R. Chapman*  
C. R. Chapman  
Manager

MWB/vvs

cc: M. W. Boback  
P. G. DeFazio  
H. D. Fletcher - 2x  
R. C. Heatherton  
A. F. Pennak

Central Files

1115558



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830  
August 22, 1975

AREA CODE 615  
TELEPHONE 483-8611

Mr. Don Wallgren  
Chief, Federal Facilities Branch  
EPA, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

NPDES PERMIT VIOLATION: PERMIT OH 0009580

A violation of the suspended solids limitation for outfall 002 at the Feed Materials Production Center occurred on August 19. A composite sample taken between 8:00 AM on the 19th and 8:00 AM on the 20th contained 248 mg/l of suspended solids. The total discharge from the outfall during this period was 34,600 gallons or 0.0346 MGD. This violation is similar in nature to the two previously reported to you in our letter of August 21, 1975, in that the violation was coincident with relatively intense rainfall. From 12:00 PM to 12:30 PM on the 18th, 0.15 inch of rainfall was recorded at the Fernald facility.

During the week of August 25-29, the ERDA-ORO Environmental Protection Branch will conduct its annual appraisal at the Fernald facility. Factors contributing to this recurring violation and possible mitigating actions will be discussed with the National Lead Company of Ohio environmental protection personnel at that time.

Sincerely,

*William H. Travis*

William H. Travis, Director  
Safety and Environmental Control Division

OSE:JKA

cc: Craig Cooperrider, OHIO, EPA



1115559



UNITED STATES  
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION

OAK RIDGE OPERATIONS  
P. O. BOX E  
OAK RIDGE, TENNESSEE 37830

AREA CODE 615  
TELEPHONE 483 8511

August 21, 1975

Mr. Don Wallgren  
Chief, Federal Activities Branch  
Environmental Protection Agency, Region V  
230 South Dearborn, 13th Floor  
Chicago, Illinois 60604

Dear Mr. Wallgren:

NOTIFICATION OF NPDES PERMIT VIOLATIONS: NPDES PERMIT NOS. OH 0006092  
AND OH0009580

Four violations of the NPDES permit issued to ERDA's Gaseous Diffusion Plant at Portsmouth, Ohio, have occurred. All were pH violations at outfall 004, the discharge point for cooling tower blowdown. Daily grab sample analyses were reported as follows:

<u>Date of Violation</u>	<u>pH Value</u>
July 10, 1975	5.8
July 29, 1975	5.9
August 13, 1975	5.8
August 14, 1975	5.8

The pH of the X-633 RCW system is currently controlled at 6.0 to prevent corrosion of the heat transfer surfaces in the process buildings. Goodyear Atomic Corporation, which operates the Portsmouth Plant, has contacted their process water consultants to investigate the possibility of controlling the RCW pH at a higher setting. They have been informed that only a slightly higher pH value would be feasible. A setting of 6.2 was suggested. It is hoped that this higher control setting will eliminate pH values below 6.0. In any case, the pH of this effluent will no longer be a problem when the new X-616 RCW Liquid Waste Disposal system becomes operational in February 1976.

Two violations at ERDA's Feed Materials Production Center have been reported. Both were violations of the suspended solids limitation at



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Mr. Don Wallgren

- 2 -

August 21, 1975

outfall 002 and both were the result of exceptionally heavy rainfall of short duration. The first violation occurred on August 10, 1975. A composite sample covering the period from 7:45 a.m. on the 10th to 7:50 a.m. on the 11th contained 167 mg/l of suspended solids. The total overflow to outfall 002 during the sampling period was just over 366,000 gallons or approximately 0.366 MGD. 1.77 inches of rain were recorded at the Fernald facility between noon and 3:00 p.m. on the 10th, with additional rain from 2:00 to 4:00 a.m. on the 11th.

The second violation at the FMPC occurred on August 15 and 16, when 117 mg/l suspended solids were found in a composite sample taken between 8:00 a.m. on the 15th and 8:00 a.m. on the 16th. Overflow to outfall 002 during this period was about 128,000 gallons or 0.128 MGD. 1.03 inches of rain were recorded during the 24-hour period, with most of the rain falling between 5:30 and 7:30 p.m. on the 15th.

There are no immediate actions being taken to reduce suspended solids in precipitation run-off at the FMPC. Some small areas of exposed soil which will be covered in the future may have contributed to the high values. Violations of this type may prove to be a recurring problem with each relatively intense rainfall event of significant duration.

Environmental monitoring personnel at the FMPC have found it is more convenient to obtain a flow-proportional composite sample during periods of discharge at outfall 002 than to take a grab sample as is stipulated in the permit. Unless advised otherwise, ERDA will assume that this method of obtaining a sample and monitoring the discharge satisfies the monitoring requirements at outfall 002, subject to Paragraph 6, Part I, B, "Additional Monitoring by Permittee."

In addition to these specific violations, the Portsmouth plant reports flows exceeding the parameters listed on their permit as limitations for outfalls 001, 003 and 005. It would not seem to be the intent of the NPDES permit to limit actual discharge flows. Accordingly, ERDA is submitting a separate letter (copy enclosed) requesting administrative permit modifications such that realistic values for the existing and anticipated future flows at these outfalls will appear on the permit. In the interim, please note the following conditions exist at the Portsmouth plant:

1115561

Mr. Don Wallgren

- 3 -

August 21, 1975

<u>Outfall Number</u>	<u>Permit Flow Limitation</u>	<u>Present Average Flow</u>
001	1.4 MGD	2.5 - 3.5 MGD
003	0.19 MGD	0.36 MGD
005	0.3 MGD	1.3 MGD

Sincerely,

*Wayne Amalley, acting*

William H. Travis, Director  
Safety & Environmental Control Division

OSI:JKA

Enclosure:

Ltr. W. H. Travis to  
J. O. MacDonald, EPA, 8/21/75

cc w/o encl.

Mr. Fred Klingelhafer  
Ohio EPA  
Mr. Craig Cooperrider  
Ohio EPA

bcc: w.o. encl.  
K. D. Fletcher, UED, ORO  
K. D. McCasland, OCC, ORO  
A. A. Schoen, EOS-HQ  
C. D. Tabor, GAT  
C. R. Chapman, NLO

1115562



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 230 SOUTH DEARBORN ST.  
 CHICAGO, ILLINOIS 60604

REFER TO THE ATTENTION OF:

55-P&TSB-16

MAR 12 1985

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

The C. T. Corporation System  
 Statutory Agent for:  
 National Lead Company of Ohio  
 Carew Tower  
 Cincinnati, Ohio 45202

Re: Complaint and Notice of  
Opportunity for Hearing  
National Lead Company of  
Ohio, (NLO) Cincinnati, Ohio

Dear Sir:

Enclosed please find a Complaint and Notice of Opportunity for Hearing concerning violations of the Toxic Substances Control Act (TSCA), 15 U.S.C. Section 2601 et seq., discovered by United States Environmental Protection Agency inspectors at The National Lead Company of Ohio (NLO), 7400 Willey Road, Fernald, Ohio, mailing address: P.O. Box 39158, Cincinnati, Ohio 45239.

I recommend that the enclosed Complaint and Rules of Practice, 40 CFR Part 22, be carefully read and analyzed to determine the alternatives available in responding to the alleged violations, proposed penalties and opportunity for a hearing. Please note that each day the violations cited herein continue constitutes a new violation for which additional penalties may be imposed.

If the National Lead Company of Ohio chooses to request a hearing to contest the facts alleged in the Complaint, an Answer and Request for Hearing is required to be filed with the Regional Hearing Clerk within the prescribed time limit of twenty (20) days following service of this Complaint. A copy of your Answer and Request for Hearing should be sent to Mr. Arthur Smith, Associate Regional Counsel, Office of Regional Counsel (5C-16), U.S. Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Mr. Smith's telephone number is (312) 353-2094.

Failure to respond to this Complaint and Notice of Opportunity for Hearing by specific answer within twenty (20) days of your receipt of this Complaint constitutes your admission of the allegations made in the Complaint. Such failure shall result in the issuance of a Default Order imposing the penalties proposed herein without further proceedings.

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*forward to HSM 5/*

Whether or not you request a hearing, an informal conference may be requested in order to discuss the facts of this case and to arrive at a settlement. If you have any questions about this matter or desire to request an informal conference for the purpose of settlement, please write to Ms. Marion Young, Toxic Substances Section (55-P&TSB-16), U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, or you may telephone her at (312) 353-2291.

Sincerely,

*William H. Sanders III*

William H. Sanders III, P.E.  
Director, Environmental Services Division

Enclosures

CERTIFICATE OF SERVICE

This is to certify that the ORIGINAL and ONE copy of this Complaint and Notice of Opportunity for Hearing was filed with the Regional Hearing Clerk on 3/12/85 and that a true and correct copy was mailed with the Consolidated Rules of Practice to Respondent at:

The C.T. Corporation System

National Lead Company of Ohio

Carew Tower

Cincinnati, Ohio 45202

  
\_\_\_\_\_  
Gloria Willis  
Office of Regional Counsel  
U.S. Environmental Protection  
Agency  
Chicago, Illinois

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**RECEIVED**  
MAR 1 1985

REGION V

REGIONAL OFFICE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

IN RE:

NATIONAL LEAD COMPANY  
OF OHIO (NLO)  
CINCINNATI, OHIO

Respondent.

COMPLAINT AND NOTICE OF  
OPPORTUNITY FOR HEARING

TSCA-V-C-530

I

COMPLAINT

This is a civil administrative action instituted pursuant to Section 16(a) of the Toxic Substances Control Act (hereafter "TSCA"), 15 U.S.C. Section 2615(a). The Complainant is the Director, Environmental Services Division, Region V, United States Environmental Protection Agency (hereafter U.S. EPA). The Respondent is the National Lead Company of Ohio (NLO), which is, and was at all times relevant to this Complaint, a corporation incorporated under the laws of the State of Ohio, with a place of business at 7400 Willey Road, Fernald, Ohio, mailing address: P.O. Box 39158, Cincinnati, Ohio 45239.

This Complaint serves as notice of the Director's preliminary determination that Respondent has violated Federal regulations regarding recordkeeping, use and storage required for polychlorinated biphenyls (PCBs), 40 CFR Part 761, promulgated under Section 6 of TSCA and thereby has violated Section 15 of TSCA, 15 U.S.C. Section 2614.

The regulations cited herein, lawfully promulgated on May 31, 1979 (44 Fed. Reg. 31542), were subsequently partially recodified and amended (see 40 CFR Part 761 et seq., July 1, 1984 ed.).

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COUNT I

1. On May 3, 1984, representatives of the U.S. EPA conducted an inspection of the Respondent's Cincinnati, Ohio, facility to determine compliance with Federal regulations, 40 CFR Part 761 et seq., governing PCBs.

2. At the time of inspection, Respondent had approximately 2,000 PCB capacitors in service, approximately 22 PCB capacitors in storage for reuse, and four drums in storage for disposal containing approximately 15 pounds of liquid PCBs, PCB solid wastes, and approximately 32 PCB capacitors.

3. Respondent's PCB capacitors and PCBs in storage contain PCBs at a concentration of 50 parts per million or greater.

4. Respondent's PCB capacitors and PCBs in storage are "PCB items" within the meaning of 40 CFR § 761.3.

5. 40 CFR § 761.180(a) requires, inter alia, that beginning July 2, 1978, each owner or operator of a facility using or storing at one time 50 or more large, high or low-voltage PCB capacitors shall develop and maintain records on the disposition of the PCBs and PCB items. These records shall form the basis of an annual document prepared for each facility by July 1 covering the previous calendar year.

6. At the time of inspection, Respondent had not prepared annual PCB documents for 1978 through 1982 to show disposition of its PCB capacitors and other PCB items in storage for disposal.

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7. Respondent's failure to develop and maintain annual PCB documents for 1978 through 1982 as required by regulations lawfully promulgated pursuant to Section 6 of TSCA, constitutes a violation of Section 15 of TSCA, 15 U.S.C. § 2614 and 40 CFR § 761.180(a) for each of those years.

COUNT 11

1. Complainant incorporates by reference Paragraphs 1 and 2 of Count 1 as if fully recited herein.

2. 40 CFR § 761.65(b) requires that, inter alia, facilities used for the storage of PCBs for a term longer than 30 days shall have adequate roof, walls, flooring, and a continuous curbing with a minimum six-inch high curb.

3. At the time of inspection, Respondent's four drums containing PCB items, in storage for disposal since 1980, were stored in an area that did not comply with the requirements of 40 CFR § 761.65(b).

4. 40 CFR § 761.65(c)(8) requires, inter alia, that PCB articles shall be dated when they are placed in storage.

5. Respondent's four drums containing PCB capacitors, PCB solid wastes, and PCB liquids, in storage for disposal are "PCB articles" within the meaning of 40 CFR § 761.3.

6. At the time of inspection, the PCB articles in storage for disposal were not dated to indicate when they were placed in storage as required by 40 CFR 765.65(c)(8).

7. Respondent's failure to provide an adequate PCB storage facility and to date the four drums containing PCB items to indicate when they were placed in storage for disposal as required by regulations lawfully promulgated pursuant to Section 6 of TSCA constitutes separate violations of Section 15 of TSCA, 15 U.S.C. § 2614 and 40 CFR §§ 761.65(b) and (c)(8).

COUNT III

1. Complainant incorporates by reference Paragraphs 1 and 2 of Count I as if fully recited herein.

2. 40 CFR § 761.65(a) requires that any PCB article of PCB container stored for disposal before January 1, 1983, shall be removed from storage and disposed of as required before January 1, 1984.

3. At the time of inspection, Respondent's four 55-gallon drums containing approximately 32 PCB capacitors, PCB liquids, and PCB solid wastes, had been stored for disposal before January 1, 1983, and were not disposed of by January 1, 1984.

4. Respondent's failure to dispose of the four drums containing PCB items, before January 1, 1984, as required by regulations lawfully promulgated pursuant to Section 6 of TSCA constitutes a violation of Section 15 of TSCA, 15 U.S.C. § 2614, and 40 CFR § 761.65(a).

II

PROPOSED CIVIL PENALTY

Section 16 of TSCA, 15 U.S.C. Section 2615, authorizes the assessment of a civil penalty of up to \$25,000 per day for each violation

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of TSCA. Based upon the facts alleged in Part I of this Complaint, and upon the nature, circumstances, extent and gravity of the violations alleged as well as Respondent's ability to pay, the effect of the proposed penalty upon Respondent's ability to continue in business, Respondent's history of prior violations of TSCA, the degree of culpability, and such other matters as justice may require, the Complainant proposes that Respondent be assessed the following civil penalty for the violations alleged in this Complaint:

COUNT I

Improper Recordkeeping.....\$10,000

15 U.S.C. Section 2614  
40 CFR § 761.180(a)

COUNT II

Improper Storage.....\$ 500

15 U.S.C. Section 2614  
40 CFR § 761.65(b)  
40 CFR § 761.65(c)(8)

COUNT III

Improper Storage.....\$ 500

15 U.S.C. Section 2614  
40 CFR § 761.65(a)

TOTAL PENALTY.....\$11,000

Payment of this penalty may be made by certified or cashier's check, payable to the United States of America, and remitted to:

BOIGI

Regional Hearing Clerk (SMFA-14)  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

The penalties proposed in Part II of this Complaint were derived by applying the factors enumerated above to the particular allegations that constitute the violations charged in this action. The reasoning for each assessment is explained in detail in the "Guidelines for Assessment of Civil Penalties Under Section 16 of the Toxic Substances Control Act; PCB Penalty Policy," which appears in the Federal Register of September 10, 1980, at 45 Fed. Reg. 59770.

### III

#### OPPORTUNITY TO REQUEST A HEARING

As provided in TSCA Section 16(a) and in accordance with the Administrative Procedure Act (5 U.S.C. Section 552, et seq.), you have the right to request a hearing regarding the proposed Order to contest any material fact contained in this Complaint, or to contest the appropriateness of the amount of the proposed penalty. If you wish to avoid being found in default, you must file an Answer and a Request for Hearing with the Regional Hearing Clerk, United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within twenty (20) days of service of this Complaint. The Answer must clearly and directly admit, deny or explain each of the factual allegations contained in the Complaint with respect to which Respondent has any knowledge, or which shall clearly state that Respondent has no knowledge as to particular factual allegations in the Complaint. The Answer shall also state:

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1. The circumstances or arguments which are alleged to constitute the grounds of defense.
2. The facts which Respondent intends to place at issue.

The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing. Failure to deny any of the factual allegations in this Complaint constitutes admission of the undenied allegations. A copy of this Answer should be sent to Arthur E. Smith, Jr., Associate Regional Counsel, Office of Regional Counsel (5C-16), U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604. Mr. Smith may be telephoned at (312) 886-6837.

Any hearing that you request will be held and conducted in accordance with the provisions of the Administrative Procedure Act (5 U.S.C. Section 552 et seq.) and the "Consolidated Rules of Practice Governing Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits" (40 CFR Part 22), a copy of which accompanies this Complaint. If you fail to file a written Answer and Request for Hearing within twenty (20) days of service of this Complaint, a Default Order may thereafter be issued by the Regional Administrator. As Respondent your default constitutes a binding admission of all allegations made in the Complaint and a waiver of your right to a hearing under TSCA. The civil penalty proposed herein shall then become due and payable without further proceedings. Such Default Order is not subject to review in any court.

IV

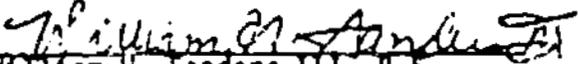
SETTLEMENT CONFERENCE

Whether or not you request a hearing, an informal conference may be requested in order to discuss the facts of this case and to arrive at a settlement. To request a settlement conference, please write to Ms. Marion Young, Toxic Substances Section (55-P&TSB-16), United States Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, or telephone her at (312) 353-2291.

Please note that a request for an informal settlement conference does not extend the twenty (20) day period during which a written Answer and Request for Hearing must be submitted. The informal conference procedure, however, may be pursued simultaneously with the adjudicatory hearing procedure.

U.S. EPA encourages all parties against whom a civil penalty is proposed to pursue the possibilities of settlement as a result of an informal conference. However, no penalty reduction will be made simply because such a conference is held. Any settlement which may be reached as a result of such conference shall be embodied in a written Consent Agreement and Final Order issued by the Regional Administrator, U.S. EPA, Region V. The issuance of such a Consent Agreement shall constitute a waiver of your right to request a hearing on any matter stipulated to therein.

If you have neither effected a settlement by informal conference nor requested a hearing within the 20-day time period allowed by this Notice, the above penalties will become due and payable upon the Regional Administrator finding you in default and issuing an Order for payment of penalties not in excess of those proposed herein. Refusal to remit such penalty will result in the referral of this matter to the United States Attorney for collection.

  
William H. Sanders III, P.E.  
Director, Environmental Services Division  
U.S. Environmental Protection Agency  
Region V  
Chicago, Illinois 60604

Dated: 2/11/85

1115574

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

NLO, Inc., : TSCA-V-C-339  
: :  
Cincinnati, Ohio : ANSWER OF RESPONDENT  
: AND REQUEST FOR  
Respondent. : CONFERENCE AND HEARING

**I. INTRODUCTION**

Respondent NLO, Inc. ("NLO"), formerly known as National Lead of Ohio, is a corporation organized under the laws of the State of Ohio. Its sole corporate activity is the operation of the Feed Materials Production Center ("FMPC") at Fernald, Ohio, pursuant to Prime Contract Number ("the Contract") DE-AC05-76OR01156. The Department of Energy ("DOE") owns the FMPC and all materials located there. A copy of the Contract is attached as Exhibit 1.

**II. RESPONSE**

The following specific defenses to the Complaint are offered:

1. The allegations contained in Paragraphs 1, 2, 3, and 6 of Count I; Paragraph 1 of Count II; and Paragraph 1 of Count III, are admitted.

2. The allegations contained in Paragraphs 4, 5, and 7 of Count I; Paragraphs 2, 3, 4, 5, 6 and 7 of Count II; and, Paragraphs 2, 3 and 4 of Count III, are conclusions of law to which no response is required. However, to the extent a

response may be required, the allegations are denied.

3. PCB contaminated wastes which do not contain any radioactive materials have been and are being properly handled at the FMPC in accordance with standards for management of these materials, including USEPA standards, as they may be applicable, consistent with the operational requirements for the FMPC. The storage of this material presents no hazard to health or the environment.

4. Four (4) drums of PCB contaminated wastes which did not contain any radioactive materials and which were the subject of the USEPA, Region 5, report of March 12, 1985, were removed from the FMPC on November 12, 1984 in conformity with USEPA requirements for their lawful transportation and disposal. The storage of this material at the FMPC at no time caused harm or hazard to health or the environment.

5. Forty-two (42) drums of PCB contaminated wastes which do contain radioactive materials are being held the FMPC. They will be held at the FMPC, in conformity with the DOE's directions, until a disposal method capable of properly handling radioactive wastes becomes available, or until the DOE directs some other handling or disposal. It is planned for these materials to be incinerated at the DOE K-25 facility in Oak Ridge, Tennessee, when DOE approves such disposal. The storage of this material is in accordance with TSCA regulations and DOE

directions and presents no hazard to health or the environment, nor has it ever presented such a hazard.

6. From time to time, in conformity with USEPA requirements, NLO will hold at the FMPC, for transportation and offsite disposal, drums of PCB contaminated wastes which do not contain any radioactive materials. Currently, there is one (1) drum of PCB contaminated wastes in this category. This drum is stored in accordance with requirements of TSCA regulations.

7. NLO believes that it is complying with the applicable requirements of federal regulations, 40 CFR § 761 et seq., in the storage of any PCB contaminated wastes, including but not limited to: (a) the development and maintenance of records of the disposition of such materials pursuant to 40 CFR § 761.180(a); (b) the preparation of PCB annual reports for 1983 and 1984; (c) the storage of PCB contaminated wastes in an enclosed area with roof, walls, flooring and a continuous six inch high curbing as indicated by 40 CFR 761.65(b); and (d) the dating of any drums of PCB contaminated wastes placed in storage, as provided by 40 CFR 761.65(c)(8).

**CONFERENCE AND/OR HEARING REQUESTED**

NLO respectfully requests a preliminary informal conference with USEPA in order to discuss this matter. NLO reserves its rights to and hereby requests a hearing on the merits of this matter, at a later date, if the matters are not satisfactorily resolved in the requested preliminary conference.

Respectfully Submitted,

J R Adams (DVE)  
NLO, Inc.

By James R. Adams, Esq.  
FROST & JACOBS  
2500 Central Trust Center  
201 East Fifth Street  
Cincinnati, Ohio 45202  
(513) 651-6800

Certificate of Service

I hereby certify that a copy of the foregoing was served upon Arthur E. Smith, Jr., Associate Regional Counsel, Office of Regional Counsel (FC-16, U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604), by regular U.S. Mail, postage prepaid, this 31st day of May, 1985.

David Van Epps