

**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 15, 2011

**Pike County
Portsmouth Gaseous Diffusion Plant
DHWM/SEDO
OH7890008983 / 04-57-0680**

Mr. William E. Murphie
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Woodrow B. Jameson
Fluor-B&W Portsmouth, LLC
P.O. Box 548
Piketon, Ohio 45661

Dear Messrs:

During a walk down of the X-630 D&D project on April 6, 2011, I observed a violation of Ohio Administrative Code (OAC) 3745-279-22(D), Used oil storage requirements for generators. Absorbents had been placed on the ground in an attempt to absorb used oil that had been dripping from the gear boxes. A used oil sheen on the standing water in an adjoining ditch was also observed as well as demolition debris partially buried under soil. The gear boxes had been previously removed during pre-D&D activities at the project.

OAC rule 3745-279-22(D) requires a generator upon detection of a release of used oil to the environment to clean up and manage properly the released used oil and other materials. Oil dripping from the scrap metal gear boxes is considered used oil. The oily absorbent had been placed on the ground sometime during the pre-D&D activities of the X-630 complex; however, pre-D&D activities had ceased on March 24, 2011 due to transition. In the future, absorbent that is used to clean up a used oil spill should be removed once it has absorbed the used oil and not left on the ground for extended periods of time.

In an email dated April 7, 2011 from USDOE, actions taken by Fluor-B&W Portsmouth, LLC to address this violation were documented. These actions included:

- Absorbent, saturated pads and stained gravels in the surrounding area were removed and disposed.
- Pigs and straw bales were placed into the onsite drainage ditch to catch any residual oil.
- Pigs were placed around the storm drain.

- Eight of the gear boxes were placed into roll-offs and a tarp was placed over top of the container to prevent water infiltration.
- The remaining gear boxes were plugged with oil absorbing pads and the pads were placed under the gear boxes.
- Inspections will be conducted daily and if needed absorbent pads will be replaced.

Photographs of the area documenting the cleanup of the used oil absorbent and the ditch area were received from USDOE on April 12, 2011; therefore, USDOE and Fluor-B&W Portsmouth, LLC have demonstrated abatement of the violation observed on April 6, 2011. If you should have any questions, please feel free to contact me at 740.380.5256.

Sincerely,



Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/mlm

Cc: Maria Galanti, DERR/SEDO

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.