



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

October 5, 2009

Re: Pike County
Uranium Disposition Services
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Paul Kreitz, Plant Manager
Uranium Disposition Services, LLC
3930 U.S. Route 23 South
P.O. Box 490
Piketon, Ohio 45661

Dear Mr. Kreitz:

On August 25, 2009, a Compliance Evaluation Inspection was conducted at Uranium Disposition Services' (UDS) operations at the Portsmouth Gaseous Diffusion Plant. The purpose of the inspection was to determine UDS's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Mark Hamilton and Barry Ko representing UDS; and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected as part of the inspection. A copy of my inspection report is attached.

As a result of my inspection, I have the following comments:

1. UDS is currently doing only testing of equipment for a readiness review of the operating equipment. The actual operation of the facility is not planned to begin until 2010.
2. UDS has reported NPDES Permit effluent violations at Outfall 001 due to storm water runoff volume not being estimated correctly in the flow estimates in the original NPDES Permit Application. UDS is considering its options in trying to prevent these effluent violations including an internal outfall for process wastewater.

If an internal outfall route is chosen, Ohio EPA would need a NPDES Permit Modification Application to modify the existing NPDES Permit. The area where the internal outfall may be located was observed during the inspection. My February 12, 2009 letter to John McCoy outlines how the internal outfall would be addressed in a NPDES Permit Modification.

3. During the testing of equipment, UDS has had some problems with the process of treating of the wastewater. UDS is considering changing some of the piping and wastewater flow to help address this problem. Ohio EPA would not require a Permit to Install (PTI) for the piping and flow changes. UDS will need to submit updated drawings and flow description if this is completed.

In conclusion, Uranium Disposition Service, LLC appeared to be in marginal compliance with its NPDES Permit at the time of the inspection, due to the past NPDES Permit effluent violations.

No response is requested to any of the above comments.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosure

c: Pete Burban, Site Lead for DOE
c: Barry Ko, UDS

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IS00034*AD	OH0125241	August 25, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Uranium Disposition Services, LLC Portsmouth Gaseous Diffusion Plant 3930 US 23, South Piketon, Ohio 45661	12:25 p.m.	June 1, 2007
	Exit Time	Permit Expiration Date
	2:30 p.m.	May 31, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Barry Ko, CIH Environmental Specialist	(740) 289-5413
Name, Address and Title of Responsible Official	Phone Number
Paul Kreitz, Plant Manager Uranium Disposition Services, LLC P.O. Box 490 Piketon, Ohio 45661	(740) 289-5441

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>S</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>M</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N/A</u> Sludge Storage/Disposal	<u>--</u> Other
<u>N/A</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

10/5/09
Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

10/15/09
Date