



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

September 18, 2008

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

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

Dear Mr. McCoy:

On August 14, 2008, 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 John McCoy, Dan Charles and Barry Ko representing UDS; and Stephen Wells and Melody Stewart representing Ohio EPA, 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. On July 22, 2008, UDS discharged cooling water from the chilled water system from a lift station located on-site. The cooling water was being used to as part of the testing procedures that are currently on-going at the facility. The cooling water had been treated with cooling water additives as part of the test. Since the cooling water overflowed the lift station, this discharge is a violation of the NPDES Permit for the facility. Cooling water is authorized to be only discharged through the permitted outfall in the NPDES Permit.

After the overflow was observed, UDS stated that samples were taken and analyzed as part of the response. UDS also stated that steps have been added to the testing procedure to help prevent another bypass/overflow from occurring in the future. UDS needs to send a letter outlining the cause and results of the results of the sampling from this overflow event.

2. UDS needs to contact the Ohio EPA when an overflow or bypass situation is discovered at the facility as required by Part III General Conditions, Paragraph 12 of the NPDES Permit. Ohio EPA waived the five-day written notification of the permit violation to allow for the analytical data and cause to be determined in this situation.

3. In response to UDS's August 20, 2008 letter in regards to sample collection procedures during testing of the automated environmental sampling equipment, Ohio EPA has no objections to the samples being collected by grab during beginning, middle and end of the discharge manually. The multiple grab samples can be manually composited for the necessary parameters with pH and chlorine highest results being reported for the discharge. UDS should also use this multiple grab sampling method in the future if a problem occurs with the composite samplers, until the sampler can be repaired in a timely manner.
4. UDS is currently doing only testing of equipment and preparing for a readiness review of the operating equipment. The actual operation of the facility is not planned to begin until 2010.

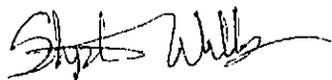
The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

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

Please respond in writing to this office to Comment #1 above.

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: Dan Charles, UDS
- c: Barry Ko, UDS
- c: Melda Rafferty, U.S. DOE, Portsmouth Gaseous Diffusion Plant

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IS00034*AD	OH0125241	August 14, 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)
Dan Charles, ES&H Manager	(740) 289-5440
Barry Ko, IH Environmental Specialist	(740) 289-5413
Name, Address and Title of Responsible Official	Phone Number
John McCoy, 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>--</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>--</u> Effluent/Receiving Waters	<u>--</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		

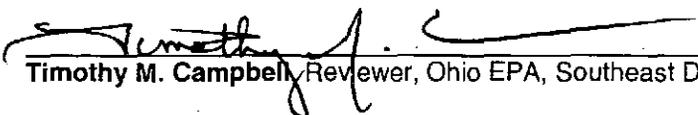
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached letter.


Stephen Wells, Inspector, Ohio EPA, Southeast District Office

9/17/08
Date


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

9/17/08
Date