



70-3070 PDR
PDR

State of Louisiana

Department of Environmental Quality



Edwin W. Edwards
Governor

Kai David Midboe
Secretary

MEMORANDUM

To: Addressees as Listed

From: Ronald Wascom *RW*
Deputy Assistant Secretary

Date: January 5, 1993

Subject: Claiborne Enrichment Center

Enclosed is a copy of a request for additional information from LES to support the water permit application.

In addition, please find enclosed a copy of a September 30, 1992 request for information. Many of you may have already received a copy of this letter, however since I am not certain as to who has received a copy, it is being distributed a second time.

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OFFICE OF AIR QUALITY

P.O. BOX 82135

BATON ROUGE, LOUISIANA 70884-2135

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PDR ADOCK 07003070
C PDR

NF04

Dr. Edward Shum
U. S. Nuclear Regulatory
Commission-NMSS
Mail Stop 6H3
Washington, D.C. 20555

Diane Curran, Esq.
Harmon, Curran, Gallagher
& Spielberg
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009-1125

Nathalie Walker, Esq.
Sierra Club Legal Defense Fund
400 Magazine Street
Suite 401
New Orleans, LA 70130

J. Michael McGarry, III, Esq.
Winston & Strawn
1400 L Street N.W.
Washington, D.C. 20005-3502

Mr. Michael Mariotte
Executive Director
Nuclear Information and
Resource Service
1424 16th Street, NW
Suite 601
Washington, DC 20036



State of Louisiana

Department of Environmental Quality



Edwin W. Edwards
Governor

November 19, 1992

Kai David Midboe
Secretary

Mr. P.G. LeRoy, Licensing Manager
Louisiana Energy Services, L.P.
Post Office Box 1004
Charlotte, North Carolina 28201

Gentlemen:

As a part of the processing of the State Permit for the Claiborne Enrichment Center near Homer, Louisiana, we have been in contact with Phil Hammond of Duke Engineering concerning certain details of the receiving water, Bluegill Pond. In conversation with Mr. Hammond on October 18, 1992, we requested the following information and he asked us to put this request in letter form to you.

1. As a part of the evaluation of the Pond as a receiving stream, we need information on the physical configuration of the Pond. A scale drawing of the Pond, showing depths or contours, would be suitable for our calculations. Volumetric calculations would also be very helpful. Please mark the position of the outfall on the drawing.
2. We understand that Duke Engineering is taking quarterly field water quality readings of conductance, pH, temperature, dissolved oxygen, and alkalinity on Lake Avalyn. We request a copy of that data, both past and future (through June 1993), to be used as an aid in assessing the characteristics of the receiving water.
3. Our permit considerations include computations involving hardness and TSS characteristics. There are no hardness or TSS data available for the receiving water or for nearby and similar waters. We therefore request that samples for hardness and TSS be taken at Bluegill Pond (vicinity of the outfall) on a twice a month basis, beginning as soon as possible, and that the results of the analysis of those samples be provided to DEQ. Max Forbes, of our Engineering Section, discussed with Mr. Hammond the taking of quarterly samples; we now feel that a hardness and TSS data base of sufficient size (about 10 determinations of each) to permit 15 percentiles of these characteristics must be developed as soon as possible, and that more frequent sampling is therefore called for.
4. Discussion with the permit writer assigned reveals a concern on your part that concentrations of sulfate in the groundwater supply could cause concentrations of that element in your effluent to be above the permissible level. To properly



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OFFICE OF WATER RESOURCES P.O. BOX 82215 BATON ROUGE, LOUISIANA 70884-2215

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document the natural sulfate condition, we request that available data on sulfate in the groundwater supply be provided to the Ground Water Protection Division of DEQ; the address is : La. Dept. of Environmental Quality, GWPD, P.O. Box 82215, Baton Rouge, La. 70884-2215. If sufficient data to provide a reasonable picture of sulfate concentrations are not available, we would suggest a sampling program to establish a data base; that data should also be provided to DEQ. In paragraph 3 above, we requested that data on hardness and TSS be gathered for Bluegill Pond. Since sulfate may also be a concern in the receiving water, we request that sampling for sulfate in Bluegill Pond be done with the sampling for hardness and TSS; this will provide a background for further considerations.

5. Representatives of DEQ are likely to be in the Homer area before December; we request your permission to visit Bluegill Pond and Lake Avalyn to take one set of sulfate, hardness, and TSS samples. If permission is granted, please furnish contact information for a local (Homer area) representative of L.E.S.-L.P..

We appreciate your cooperation in responding to these requests; this information will expedite the processing of the permit. If you have questions on any of the requests, please contact Cheryl LeJeune at 504-765-0525.

Sincerely,



Gary Aydell, Acting Administrator
Water Pollution Control Division

GRA:MF:dps

c: Louis Johnson, Administrator, GWPD
Program Manager, Industrial Permits Section
Program Manager, Planning and Assessment Section
Karen Bond, EPA (hold for quarterly report)
Jack Ferguson, EPA
DEQ Regional Office, Northwest
DEQ files for Permit Numbers LA0092196, WP4154
Manager, Engineering Section
Faith Leroy, (C-220000-27, WE-5, 24400-92-130)
~~Cheryl LeJeune, Permits Section~~



State of Louisiana
Department of Environmental Quality



Edwin W. Edwards
Governor

SEP 30 1992

Kai David Midboe
Secretary

Certified Mail#

541263B

PERMIT NUMBERS:
LA 0092196
WP 4154

RECEIVED

SEP 30 1992

LA DEPARTMENT OF
ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

Louisiana Energy Services, L.P.
Claiborne Enrichment Center
Post Office Box 1004
Charlotte, North Carolina 28201

Attention: P. G. LeRoy, Licensing Manager

Subject: LWDPs Permit WP Draft 4154 for Louisiana Energy Services, L.P.'s
Claiborne Enrichment Center

Dear Mr. LeRoy:

In reference to the meeting held on September 22, 1992 attended by Mr. Phil Hammond, several concerns were raised regarding Louisiana Energy Services (LES) operating in the State of Louisiana. Per LAC 33:IX.303.A, please supply the following additional information:

1. There is some question as to the source of the regulatory limits listed in Table 4.4-2 in Attachment 8 of the LWDPs permit application submitted on July 2, 1992. What is the rationale and specific citation for the limits as listed.
2. Uncontaminated stormwater runoff from the facility was overlooked in the application as a source requiring monitoring and sampling. Please complete Section II of the SCC-2 application addressing this runoff from Outfall 002 to Bluegill Pond.
3. Does the possibility of radioactive contamination of the stormwater that exits Outfall 002 exist? Please give a detailed explanation of the procedure for transportation and storage of any radioactive material at the site.
4. During the meeting, there was some confusion as to the origin and quantity of carbon tetrachloride actually discharged through Outfall 001. Please verify the analytical numbers for carbon tetrachloride as presented in Attachment 5 of the application.



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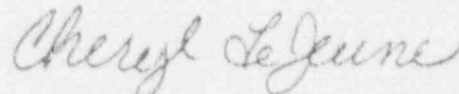
OFFICE OF WATER RESOURCES P.O. BOX 82215 BATON ROUGE, LOUISIANA 70884-2215

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Louisiana Energy Services, L.P.
RE: Draft WP 4154
Page 2

Please submit the above information along with this letter, within 30 days.
Should you have any questions concerning this matter please contact me at
(504) 765-0537.

Sincerely,



Cheryl LeJeune, EQS
Permits Section

Enclosure

cc: Phil Hammond
Duke Engineering & Services, Inc.
230 South Tryon Street
Post Office Box 1004
Charlotte, North Carolina 28201-1004

Dr. Edward Shum
U.S. Nuclear Regulatory Commission-NMSS
Mail Stop 6H3
Washington, D.C. 20555

Fred Humpke, 6W-PI
U. S. Environmental Protection Agency, Region VI

J. Dale Givens
Office of Water Resources

Ronnie Wascom, Deputy Assistant Secretary
Office of Air Quality and Radiation Protection

Northwest Regional Office
Water Quality Management Division

Cheryl LeJeune
Water Pollution Control Division

SECTION II

Complete Section II for each discharge outfall. Outfalls are discharge points. An external outfall is a discrete discharge point beyond which the waste stream receives no further mixing with other waste streams prior to discharging into a receiving water. An internal outfall is an outfall for a waste stream that combines with other waste stream(s) before discharging into an "external" outfall. Please provide your after treatment test results in the units asked for on the application. For proposed facilities, estimates should be provided for any expected contaminants even though the facility is not in place yet. If you cannot estimate these parameters yourself, obtain the services of a consultant or other knowledgeable individual.

- A. Complete below for each discharge outfall. Use a separate sheet for additional discharge outfalls.

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
BOD ₅				
COD				
TOC				
Chlorides (CL ⁻)				
Sulfates (SO ₄)				
Oil and Grease				
Ammonia (as N)				
Total Solids				
Total Suspended Solids				
Total Dissolved Solids				
	Daily Minimum	30-Day Maximum*	30-Day Low Flow*	Long Term Average*
Flow (GPD)				
	Minimum	Maximum		
Discharge Duration (hr./day)				
pH				
Temperature (°C)				
Turbidity				
Color (True/Apparent)				

* Within the previous year

B. For each outfall, if any of your processes which contribute wastewater belong to one or more of the following primary industry categories, you must report quantitative test data for (1) all of the toxic metals, cyanide, and total phenols, and (2) the organic toxic pollutants as applicable to your category below indicated by asterisks. Circle your industry category(ies). Use separate sheets for additional discharge outfalls. Also include any specific products, raw materials, or waste products which are or may potentially be present in the effluent.

Primary Industry Category	Volatile	Acid	Base/neutral	Pesticide/PCB's
Adhesives and Sealant	X	X	X	
Aluminum forming	X	X	X	
Auto and Other Laundries	X	X	X	
Battery Manufacturing	X		X	
Coal Mining	X	X	X	X
Coil Coating	X	X	X	
Copper Forming	X	X	X	
Electrical and Electronic Components	X	X	X	X
Electroplating	X	X	X	
Explosives Manufacturing		X	X	
Foundries	X	X	X	
Gum and Wood Chemicals	X	X	X	X
Inorganic Chemicals Manufacturing	X	X	X	
Iron and Steel Manufacturing	X	X	X	X
Leather Tanning and Finishing	X	X	X	
Mechanical Products Manufacturing	X	X	X	X
Nonferrous Metals Manufacturing	X	X	X	X
Ore Mining	X	X	X	X
Organic Chemicals Manufacturing	X	X	X	X
Paint and Ink Formulation	X	X	X	X
Pesticides	X	X	X	X
Petroleum Refining	X	X	X	
Pharmaceutical Preparations	X	X	X	X
Photographic Equipment and Supplies	X	X	X	
Plastics Processing	X			
Plastic and Synthetic Materials Manufacturing	X	X	X	X
Porcelain Enameling	X		X	X
Printing and Publishing	X	X	X	X
Pulp and Paper Mills	X	X	X	
Rubber Processing	X	X	X	
Soap and Detergent Manufacturing	X	X	X	
Steam Electric Power Plants	X	X	X	X
Textile Mills	X	X	X	X
Timber Products Processing	X	X	X	

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
VOLATILE ORGANIC CHEMICALS - EPA Method 624 suggested				
acrolein				
acrylonitrile				
benzene				
bromoform				
carbon tetrachloride				
chlorobenzene				
chlorodibromomethane				
chloroethane				

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
2-chloroethylvinyl ether				
chloroform				
dichlorobromomethane				
1,1-dichloroethane				
1,2-dichloroethane				
1,1-dichloroethylene				
1,2-dichloropropane				
1,3-Dichloropropylene				
ethylbenzene				
methyl bromide				
methyl chloride				
methylene chloride				
1,1,2,2-tetrachloroethane				
tetrachloroethylene				
toluene				
1,2-trans-dichloroethylene				
1,1,1-trichloroethane				
1,1,2-trichloroethane				
trichloroethylene				
vinyl chloride (chloroethylene)				
ACID EXTRACTABLE ORGANIC CHEMICALS - EPA Method 625 suggested				
2-chlorophenol				
2,4-dichlorophenol				
2,4-dimethylphenol				
4,6-dinitro-o-phenol				
2,4-dinitrophenol				
2-nitrophenol				
4-nitrophenol				
p-chloro-m-cresol				
pentachlorophenol				
phenol				
2,4,6-trichlorophenol				

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
BASE/NEUTRAL EXTRACTABLE ORGANIC CHEMICALS - EPA Method 825 suggested				
acenaphthene				
acenaphthylene				
anthracene				
benzidine				
benzo(a)anthracene				
benzo(a)pyrene				
3,4-benzo flouranthene				
benzo(ghi)pyrene				
benzo(k)fluoranthene				
bis(2-chloroethoxy)methane				
bis(2-chloroethyl)ether				
bis(2-chloroisopropyl)ether				
bis(2-ethylhexyl)phthalate				
4-bromophenyl phenyl ether				
butyl benzyl phthalate				
2-chloronaphthalene				
4-chlorophenyl phenyl ether				
chrysene				
dibenzo(a,h)anthracene				
1,2-dichlorobenzene				
1,3-dichlorobenzene				
1,4-dichlorobenzene				
3,3'-dichlorobenzidine				
diethyl phthalate				
dimethyl phthalate				
di-n-butyl phthalate				
2,4-dinitrotoluene				
2,6-dinitrotoluene				
di-n-octylphthalate				
1,2-diphenylhydrazine				
fluoranthene				

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
fluorene				
hexachlorobenzene				
hexachlorobutadiene				
hexachlorocyclopentadiene				
hexachloroethane				
indeno(1,2,3-cd)pyrene				
isophorone				
naphthalene				
nitrobenzene				
N-nitrosodimethylamine				
N-nitrosodi-n-propylamine				
N-nitrosodiphenylamine				
phenanthrene				
pyrene				
1,2,4-trichlorobenzene				
PESTICIDES & PCB'S - EPA Method 608 required				
aldrin				
Aroclor 1016				
Aroclor 1221				
Aroclor 1232				
Aroclor 1242				
Aroclor 1248				
Aroclor 1254				
Aroclor 1260				
alpha-BHC				
beta-BHC				
delta-BHC				
gamma-BHC				
chlordane				
4,4'-DDT				
4,4'-DDE				
4,4'-DDD				

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
dieldrin				
alpha-endosulfan				
beta-endosulfan				
endosulfan sulfate				
endrin				
endrin aldehyde				
heptachlor				
heptachlor epoxide				
toxaphene				
2,3,7,8-tetrachlorodibenzo-p-dioxin - use EPA Method 1613				
METALS, CYANIDE, AND TOTAL PHENOLS - use designated EPA Method				
Antimony, Total - 204.2				
Arsenic, Total - 206.2				
Beryllium, Total - 210.2				
Cadmium, Total - 213.2				
Chromium, Total - 218.2				
Chromium, Hexavalent - 218.4				
Copper, Total - 220.2				
Lead, Total - 239.2				
Mercury, Total - 245.1				
Nickel, Total - 249.2				
Selenium, Total - 272.2				
Silver, Total - 272.2				
Thallium, Total - 279.2				
Zinc, Total - 289.2				
Cyanide, Total - 335.1				
Cyanide, Free*				
Phenols, Total*				
Aluminum, Total*				
Barium, Total*				
Boron, Total*				

Outfall Identification:				
POLLUTANT	EFFLUENT			
	CONCENTRATION (ppm)		MASS (lbs/day)	
	Daily Average	Daily Maximum	Daily Average	Daily Maximum
Cobalt, Total*				
Iron, Total*				
Iron, Dissolved*				
Magnesium, Total*				
Molybdenum, Total*				
Manganese, Total*				
Tin, Total*				
Titanium, Total*				

* use EPA approved method

- C. List any toxic materials which the applicant currently uses or manufactures as an intermediate, feedstock, final product, or by-product:

- D. List pertinent physical and chemical properties (e.g., toxic components, taste and odor compounds, heavy metals, etc.):

- E. Toxicity Data. A bioassay test (48 hr. LC_{50}) report is required if toxic compounds are present. Show concisely the nature and results of any tests and subsequent evaluations concerning the toxicity of the waste on fish or other animals:

F. Treatment Methods. Please be specific for each outfall: _____

G. Disposal. Solid or liquid waste disposal methods and facilities: _____

H. History. Attach a report of the history of water violations and enforcement actions for the facility (including, but not limited to, a summary of permit excursions for the last two years, administrative orders, compliance orders, notices of violation, cease and desist orders and any other enforcement actions either already resolved or pending). The office may choose, at its discretion, to require a more in-depth report of violations and compliance for the applicant covering any law, permit, or order concerning pollution at this or any other facility owned or operated by the applicant:

I. Receiving Waters. Indicate how the wastewater reaches state waters (named waterbodies). This will usually be either "directly", "ditch" (if it is a highway ditch, indicate the highway), or by "private sewer" (if public, indicate). Please specifically name all of the minor waterbodies that your wastewater will travel through on the way to a major waterbody. This information can be obtained from U.S.G.S. Quadrangle Maps.

Wastewater flows:

[] directly; [] by ditch; [] by private sewer; [] by _____
(specify)

into _____; thence into _____;

thence into _____; thence into _____

(name of stream, lake, marsh or underground horizon receiving the waste)