



Nuclear Fuel Services, Inc.
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

January 2, 2003

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JAN 3 2003

JOHNSON CITY ENVIRONMENTAL
ASSISTANCE CENTER

Mr. Andrew Tolley
Environmental Field Office Manager
Johnson City Environmental Assistance Center
2305 Silverdale Road
Johnson City, Tennessee 37601-2162

Subject: Elevated Storm Water Sampling Results

- References:
- 1) NFS NPDES TMSP No. TNR050873
 - 2) *TN Storm Water Monitoring Report* (21G-99-0014), Letter from T.S. Bear to Sims Crownover, dated 2/23/99
 - 3) *Storm Water Monitoring for Magnesium* (15N990216), Letter from Saya Qualls to T.S. Bear, dated 12/2/99
 - 4) *TN Storm Water Monitoring Report* (21G-01-0017), Letter from B.M. Moore to Sims Crownover, dated 1/31/01

Dear Mr. Tolley:

In accordance with reference 1, Nuclear Fuel Services, Inc. (NFS) is providing notification within thirty (30) days of receiving storm water sampling results indicating that nitrate/nitrite as nitrogen, total recoverable magnesium, and total recoverable aluminum are above the cut-off concentrations. The results of the annual storm water sampling event, conducted on November 21, 2002, were received by NFS on December 6, 2002. These results identified the following elevated concentrations:

Parameter	Sampling Results (mg/l)	Permit Cut-Off Concentrations (mg/l)
Nitrate/Nitrite as Nitrogen	0.950	0.68
Total Recoverable Magnesium	4.8	0.0636
Total Recoverable Aluminum	3.9	0.75

An investigation into these elevated concentrations was conducted December 6 - 10, 2002. While the specific contributors could not be identified during the investigation, historical data reveals that these same constituents were elevated during the February 1998 - December 2000 storm water sampling events. Research has indicated that the nitrate and magnesium concentrations are due to naturally occurring background levels in surface water and groundwater in the vicinity of the NFS site. Attachment I provides details of previous

correspondence related to this matter. The issue of the storm water cut-off concentrations for nitrate/nitrite and magnesium being greater than background has been identified to TDEC. A request was made by NFS to TDEC for a modification of these cut-off concentration limits; however, no such modification was issued. The aluminum contributor remains unidentified, as it did in the 1998 Storm Water Report.

The following corrective action has been taken: The NFS Storm Water Pollution Prevention Plan was reviewed to determine if any revisions were necessary to reduce the introduction of nitrates, magnesium, and aluminum to storm water. No revision was required.

The following corrective action will be taken and completed by January 30, 2003: NFS will reinstruct construction personnel in the protection of storm water and storm water ditches from pollutants.

If you or your staff have any questions or need further information, please contact Ms. Janice Greene, Environmental Safety Manager, at (423) 743-1730, or me. Please reference our unique document identification number (21G-02-0410) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, Inc.

A handwritten signature in black ink, appearing to read "BMM" with a stylized flourish.

B. Marie Moore
Vice President
Safety & Regulatory