



COPY

RE: 1707-EQ

July 14, 2017

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RETURN RECEIPT REQUESTED

Brandon Tyler, E.I.
Industrial Wastewater Enforcement Section
Water Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: NPDES Compliance Evaluation Inspection Response
Sequoyah Fuels Corporation
NPDES Permit No. OK0000191
Facility ID No: I-68000010

Dear Mr. Tyler:

This letter is being written in response to an inspection report from the Oklahoma Department of Environmental Quality (DEQ) to Sequoyah Fuels Corporation (SFC) dated June 23, 2017. In that correspondence the DEQ noted the following violations and/or deficiencies:

- Sequoyah Fuels is not certified to conduct field measurement for pH; and,
- The percentage error between the primary and secondary flow meters is outside the allowable error of ± 10 percent.

Sequoyah Fuels Corporation (SFC) is taking the following corrective action relating to the above items and will also address an additional deficiency cited in the report.

SFC contacted David Caldwell of DEQ on May 16, 2017 to obtain information relating to laboratory certification. Mr. Caldwell provided direction, recommendations, and templates for standard operating procedures. SFC is using these templates to prepare appropriate documentation to submit to DEQ with the application for laboratory certification. SFC plans to submit this application by September 1, 2017.

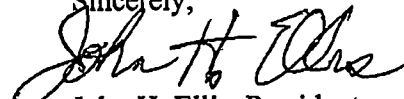
SFC has been in contact with ISCO, the manufacturer of the flow meter, and determined that the flow meter should be returned to them for diagnosis and repair / calibration. SFC reviewed the method utilized for calibration with ISCO and was informed by ISCO that the method used by SFC is appropriate. There appears to be a linearity issue with flow meter. Therefore SFC has recalibrated the instrument at the flow rate present when pumping water from the storm water reservoir, which is close to a constant flow rate. Comparison of the primary and secondary flow measurement devices has confirmed that SFC is within ± 10 %. Flow checks will be conducted

weekly to confirm that the primary and secondary flow measurement devices compare within 10% until we can return the instrument to ISCO. Due to continued heavy rainfall events SFC has needed to continue discharging from the storm water reservoir to Outfall 008. When SFC is satisfied that the level of the storm water is low enough to provide sufficient capacity to reduce the possibility of a bypass SFC will discontinue pumping, take the flow meter out of service at Outfall 008 and return the equipment to ISCO. SFC anticipates returning the flow meter to ISCO during the mid-August time frame when the weather conditions are typically hot and dry.

A comment was made in the inspection report that wooden pallets and other items were seen around the berms of several impoundments. A recommendation was made that Sequoyah Fuels needs to take corrective actions to ensure good housekeeping around impoundments so the berms can be maintained. SFC will improve housekeeping around the impoundments and maintain the berms.

If you have any questions please feel free to contact me at 918-489-5511, extension 226.

Sincerely,



John H. Ellis, President

cc: Axel D. Hannenberg, DEQ
Ken Kalman, NRC
Robert J. Evans, NRC