

**3943**

**PERMITS TO OPERATE AIR CONTAMINANT  
SOURCES**

**11/20/92**

**OEPA/DOE-FN  
8  
LETTER**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

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NOV 24 4 54 PM '92

George V. Voinovich  
Governor  
Donald R. Schregardus  
Director

3943

1431110128 K001  
U.S. DEPT OF ENERGY-FERNALD E  
BEHRAM SHROFF  
P.O. BOX 398705  
CINCINNATI OH 45239

CERTIFIED MAIL

November 20, 1992

[Redacted]  
[Redacted]  
G-000-104,37

Enclosed are Permit(s) to Operate which allow you to operate the described air contaminant source(s) in the manner indicated in the permit(s). Because these permits contain several conditions and restrictions, I urge you to read them carefully.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact the air pollution control agency to which you submitted your application.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

TGR/tkb

**PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE****3943**Date of Issuance **11/20/92**Application No. **1431110128K001**Effective Date **11/20/92**Permit Fee **\$100**

This document constitutes issuance to:

**U.S. DEPT OF ENERGY-FERNALD ENVR MANAGEM  
WILLEY ROAD  
FERNALD** **OHID 45239**

of a permit to operate for:

**DRUM COATING LINE  
PLANT NO. 3: 8-031**

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until **11/19/95**  
You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:  
**SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY  
1632 CENTRAL PKWY. CINCINNATI OH, 45210  
(513) 651-9437**
10.  If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

*Donald R. Scheyordus*

Director

EPA 3834  
Revised 9-90

APPLICATION NUMBER: 1431110128 K001  
FACILITY NAME: U.S. Dept. of Energy - Fernald  
EQUIPMENT DESCRIPTION: Environmental Management Project  
Drum Coating Line  
COMPANY ID: Plant No. 8: 8-031

3943

### SPECIAL TERMS AND CONDITIONS

1. Applicable Rules:

The following rule of the Ohio Administrative Code establishes the applicable emission limitations and/or control requirements for this source: 3745-21-09(U) (1).

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

2. Throughput Limitations:

A. The drum coating line shall not process more than 35 drums per hour and 200,000 drums per year.

B. The dryer associated with the drum coating line shall not be operated more than 8400 hours per year.

C. The drum coating line shall not employ more than 10,000 gallons of coating per year (as applied).

3. VOC Content Limitations:

The volatile organic compound (VOC) content of the coatings employed in the drum coating line shall not exceed the following:

A. 3.04 pounds per gallon, excluding water for interior coatings.

B. 2.72 pounds per gallon, excluding water for exterior coatings.

4. Record-keeping and Reporting Requirements:

The U.S. D.O.E., F.E.M.P. shall maintain daily records which list the following information for each coating employed in this source:

A. the company identification of the coating;

B. the number of gallons employed;

C. the VOC content in pounds of VOC per gallon of coating, excluding water;

D. the number of drums coated hourly; and

- E. the number of hours that the dryer associated with the drum coating line is operated.

These daily records, as well as any supporting coating analyses and computations, shall be retained in the company's files for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director for review during normal business hours.

This facility shall submit semiannual reports to the SWOAPCA which summarize the following information for each coating employed in this source during the previous six calendar months: company identification of the surface coating; the total number of gallons employed, the VOC content (in pounds VOC per gallon of coating, excluding water) and the number of drums coated and total hours of dryer operation. The D.O.E. F.E.M.P. shall submit these reports by February 15 and August 15 of each year and shall cover the previous six calendar months.

PREPARED BY: Peter Sturdevant  
DATE PREPARED: October 22, 1992

**PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE**Date of Issuance **11/20/92**Application No. **1431110128T112**Effective Date **11/20/92**Permit Fee **\$500**

This document constitutes issuance to:

**U.S. DEPT OF ENERGY-FERNALD ENVR MANAGEM  
WILLEY ROAD  
FERNALD OHIO 45239**

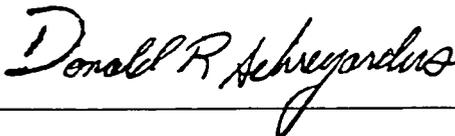
of a permit to operate for:

**K-65 SILO #2 STORAGE TANK-RADIUM CAKE  
K-65-2 (65-002): 134,058 CUBIC FEET**

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until **11/19/95**  
You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:  
**SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY  
1632 CENTRAL PKWY. CINCINNATI OH, 45210  
(513) 651-9437**
10.  If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

APPLICATION NUMBER: 1431110128 T112  
FACILITY NAME: U.S. Dept. of Energy - Fernald  
EQUIPMENT DESCRIPTION: Environmental Management Project  
K-65 Silo #2 Storage Tank - Radium Cake  
COMPANY ID: K-65-2 (65-002): 134,058 Cubic Feet

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### SPECIAL TERMS AND CONDITIONS

1. Applicable Rules:

The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source: 3745-15-06 and 3745-15-07.

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

2. Consent Decree:

The facility shall not make any physical change in or change in the method of operation of the K-65 silo at FEMP that will increase the amount of any air pollutant emitted or will result in the emission of any air pollutant not previously emitted without first obtaining authorization from the Southwestern Ohio Air Pollution Control Agency (SWOAPCA). In addition to obtaining the authorizations required by this paragraph, the facility shall also notify the SWOAPCA of their proposed actions for informational purposes.

Pursuant to 42 U.S.C. 9621(e)(1), any remedial action selected under the CERCLA for the K-65 silos shall not be subject to these permit requirements.

The facility shall comply with the requirements of Ohio Administrative Code 3745-15-06(B)(1) to immediately notify the SWOAPCA in the event that any emission source, air pollution control equipment, or related facility breaks down in such a manner as to cause the emission of air contaminants in violation of any applicable law. In the event that giving immediate notification would increase the potential threat to human health and safety or the environment, notification shall be given as soon as it can be given without increasing the potential threat to human health and safety or the environment.

STATEMENT OF

3943

THE OHIO ENVIRONMENTAL PROTECTION AGENCY

1431110128K001  
APPLICATION NUMBER

\$100.00  
AMOUNT DUE

U.S. DEPT OF ENERGY-FERNALD ENVR MANAGEM  
FACILITY NAME

PURSUANT TO SEC.3745.11 OF THE OHIO REVISED  
CODE, FULL AMOUNT OF THIS PERMIT FEE IS DUE  
WITHIN FIFTEEN (15) DAYS OF THIS PERMIT.  
MAKE CHECKS PAYABLE TO:

**THE TREASURER OF THE STATE OF OHIO.**

RETURN THIS STATEMENT WITH YOUR REMITTANCE USING  
THE ENCLOSED ENVELOPE TO:

GENERAL ACCOUNTING  
OHIO EPA  
P.O. BOX 1049  
COLUMBUS, OH 43266-0149

ALL QUESTIONS REGARDING THIS FEE SHOULD INCLUDE  
THE APPLICATION NUMBER SHOWN ABOVE.

3943

STATEMENT OF  
THE OHIO ENVIRONMENTAL PROTECTION AGENCY

1431110128T112  
**APPLICATION NUMBER**

\$500.00  
**AMOUNT DUE**

U.S. DEPT OF ENERGY-FERNALD ENVR MANAGEM  
**FACILITY NAME**

PURSUANT TO SEC.3745.11 OF THE OHIO REVISED  
CODE, FULL AMOUNT OF THIS PERMIT FEE IS DUE  
WITHIN FIFTEEN (15) DAYS OF THIS PERMIT.  
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