



Department of Energy

1617



Ohio Field Office  
Fernald Area Office  
P. O. Box 538705  
Cincinnati, Ohio 45253-8705  
(513) 648-3155

JUL 30 1998

DOE-1050-98

Ms. Linda R. Ours  
Ohio Environmental Protection Agency  
1800 Watermark Drive  
Columbus, Ohio 43215-1099

Dear Ms. Ours:

**NON-SUBMITTAL OF 1997 AIR FEE EMISSION REPORT**

This letter is in response to your warning letter dated July 14, 1998. This warning letter was to remind us to submit a fee emissions report for calendar year 1997. This would be needed if our facility was subject to OAC 3745-77-02. However, beginning with calendar year 1997, the Title V rules were no longer applicable to the Fernald Environmental Management Project (FEMP).

For the years 1993 through 1996, the FEMP was subject to the Title V regulations and in compliance with those requirements, submitted an annual fee emissions report. In 1996 the sources that caused our facility to be subject to these requirements were shut down and the operating permits removed. At that time we notified the Hamilton County Department of Environmental Services that our facility was no longer subject to the Title V requirements.

In February of 1997, Mr. Peter Sturdevant of the Hamilton County Department of Environmental Services confirmed that the FEMP had been removed from the Ohio Environmental Protection Agency's (OEPA) list of Title V sources and that the FEMP would be treated as a non-major source (Record of Telephone Conversation, TC:FCDP(PSI):97-0005). This meant that OAC rule 3745-78-02(A) would no longer be applied to the FEMP and the Title V fee emission reports were no longer required.

In May of 1998, the FEMP received a non-Title V fee emissions report (Blue Card) from the OEPA. This emissions report was submitted to OEPA on June 9, 1998.

Linda R. Ours

-2-

JUL 30 1998

If you have any questions regarding this matter please contact Ed Skintik of my staff at (513) 648-3151 or Phillip Spotts of Fluor Daniel Fernald at (513) 648-5296.

Sincerely,



for Jack R. Craig  
Director

FEMP:Skintik

Enclosures (3)

- FDF letter C:EC:96-0086
- FDF letter C:FCDP(PSI): 98-0027
- Telephone Record TC:FCDP(PSI): 97-0005

cc w/enclosure:

AR Coordinator

cc w/o enclosure:

- L. Goidell, FDF
- P. Spotts, FDF





State of Ohio Environmental Protection Agency

1617  
FERNALD  
L-1920

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

11 23 102 AM '99 P.O. Box 1049  
Columbus, OH 43216-1049

\*\*\*Important Reminder\*\*\*

Warning Letter

July 14, 1998

Environmental Manager,

Pursuant to OAC rule 3745-78-02 (A) any owner or operator of sources subject to OAC rule 3745-77-02 is required to submit a fee emissions report that quantifies actual emissions data for particulate matter, sulfur dioxide, organic compounds, nitrogen oxides, and lead. This fee emissions report is to be submitted by owners or operators of affected facilities by April 15, 1994 and each April 15 thereafter indicating the actual emissions for the previous calendar year.

Our records indicate that a fee emissions report for your facility has not been submitted for calendar year 1997. This letter serves as a warning that failure to fulfill your obligation to submit a fee emissions report for calendar year 1997 will result in the initiation of an Enforcement Action Request to the Ohio EPA, Central Office. Please respond within fourteen (14) days of receipt of this letter with a completed fee emissions report indicating the facility-wide estimated actual emissions for calendar year 1997. The fee report for 1997 must be submitted electronically via the Starship software.

Please feel free to contact me at 614-644-3621 if you have any questions regarding this letter.

Sincerely,

Linda R. Ours  
Environmental Specialist

cc: Linda Ours  
DO/LAA Supervisors

000003

Fernald Environmental



Restoration Management Corporation

P. O. Box 538704 Cincinnati, Ohio 45253-8704 (513) 648-3000

July 1, 1996

Fernald Environmental Management Project  
Letter No. C:EC:96-0086

Mr. Peter J. Sturdevant, Compliance Specialist  
Air Quality Management  
Hamilton County Department of Environmental Services  
1632 Central Parkway  
Cincinnati, Ohio 45210

Dear Mr. Sturdevant:

**WITHDRAWAL OF THE OEPA PERMITS TO OPERATE (PTO) FOR THE TWO 100 MMBTU COAL-FIRED BOILERS AND OF THE TITLE V PERMIT APPLICATION OF THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT -(OEPA) PREMISE NO. 1431110128 B001 AND B003**

As of June 21, 1996 the two 100 MMBTU/HR coal fired boilers located at our facility have ceased operations and have been permanently shutdown. These boilers were operated under permits to operate B001 and B003. We do not intend to restart these sources and are thereby surrendering our permits to operate.

With the shutdown of these sources the FEMP is no longer considered a major source as defined in OAC 3745-77-01(W) and as such is no longer required to obtain a Title V air permit. We request that the FEMP be removed from the list of Title V sources and that our Title V permit application be withdrawn from consideration. We understand that in this event we will continue to be regulated under the OAC 3745-35 rules for individual sources.

Please contact Ervin Fisher, of my staff, at (513) 648-5293 if you have any questions.

Sincerely,

Thomas J. Walsh  
Acting Director  
Environmental Compliance

TJW:EF:mhv

000004





P.O. Box 538704 Cincinnati, Ohio 45253-8704 (513) 648-3000

1617

June 9, 1998

Fernald Environmental Management Project  
Letter No. C:FCDP(PSI): 98-0027

Mr. Michael Ahern  
Supervisor, Permit Management Unit  
OEPA, Division of Air Pollution Control  
P.O. Box 1049  
Columbus, OH 43216-1049

Dear Ahern:

**NON-TITLE V AIR FEE EMISSIONS REPORTING REQUIREMENTS**

Enclosed is the Blue Card as requested. At this time only the emissions for 1997 are being reported for air fee emissions. Emissions for 1996 are not being reported, as this year was previously reported and a fee paid under the Title V air fee emissions system.

Originally, the FEMP was a Title V facility. We reported and paid annual emission fees within that system. In 1996 we reduced emission sources to the extent we were no longer classified as a Title V facility. Therefore, 1996 was the last year for which we reported and paid emission fees under the Title V program. Enclosed is a copy of our letter, fee assessment statement, and check paying the 1996 fee assessment.

If you have any questions concerning this matter, please contact me at (513) 648-4124.

Sincerely,

Lewis C. Goidell  
Manager, Environmental Compliance  
Project Support & Integration

LCG:PBS:jes  
Enclosure

000006