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Environmental Restoration Program

**OPERABLE UNIT 9,
SITE SCOPING REPORT:
VOLUME 10 - PERMITS AND
ENFORCEMENT ACTIONS**

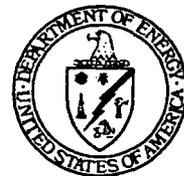
**MOUND PLANT
MIAMISBURG, OHIO**

May 1992

FINAL

**Department of Energy
Albuquerque Field Office**

Environmental Restoration Program
Technical Support Office
Los Alamos National Laboratory



ENVIRONMENTAL RESTORATION PROGRAM

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SITE SCOPING REPORT
VOLUME 10 - PERMITS AND ENFORCEMENT ACTIONS**

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Signature Page

This report is Volume 10 of a multiple-volume Site Scoping Report providing the background information pertinent to the remedial investigation/feasibility study (RI/FS) of the Mound Plant. Under the terms of the Federal Facility Agreement between DOE and US EPA, this report is submitted to US EPA for approval.

This report is approved by US EPA only for the purposes of scoping the RI/FS, and approval does not imply concurrence with the interpretations presented herein. It is recognized that additional information will be collected during the RI/FS and may supersede information contained in this report.

APPROVED:

Diana Mally
Remedial Project Manager
U.S. Environmental Protection Agency
Region V

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ACRONYMS

AEA	Atomic Energy Act
APC	air pollution control (regulation)
ARRP	Air Resources-Regional Project
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
DAO	Dayton Area Office
DOE	U.S. Department of Energy
EG&G-MAT	EG&G Mound Applied Technologies
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
HAPCR	hazardous air pollution control regulation
HRS	Hazard Ranking System, CERCLA
HSWA	Hazardous and Solid Waste Amendments of 1984
LDR	land disposal restrictions
MCCHD	Montgomery County Combined Health District
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NPDES	National Pollutant Discharge Elimination System
NRC	Nuclear Regulatory Commission
OAC	Ohio Administrative Code
OEPA	Ohio Environmental Protection Agency
ORC	Ohio Revised Code
PCB	polychlorinated biphenyl
PE	professional engineer
RAPCA	Regional Air Pollution Control Agency
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
RI/FS	remedial investigation/feasibility study

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1. INTRODUCTION

The U.S. Department of Energy (DOE) Mound Plant, Miamisburg, Ohio, was placed on the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) National Priorities List (NPL) on November 21, 1989 (54 Federal Register 48184). Pursuant to its NPL status, the DOE signed a CERCLA Section 120 Federal Facility Agreement (FFA) with the U.S. Environmental Protection Agency (EPA) that became effective October 11, 1990. A similar agreement is currently in negotiation between the DOE and the Ohio EPA (OEPA). The terms of the FFA require that the DOE develop and implement remedial investigations and feasibility studies and conduct interim remedial actions in order to ensure that environmental impacts associated with past and present activities at the site are thoroughly investigated and appropriate action is taken to protect the public health and welfare and the environment.

The Albuquerque Operations Office of the DOE established the Environmental Restoration Program in 1984 to collect and assess environmental data in order to develop a conceptual site model to assess both the nature and extent of contamination, and to identify potential exposure pathways and potential human and environmental receptors. These activities have been conducted under DOE policy to ensure that all facilities comply with applicable environmental regulations. In order to provide EPA with sufficient information and data gathered during these previous investigations, a multi-volume scoping report providing background information has been prepared. The Site Scoping Report will provide descriptions and summaries of the current conditions and characteristics of Mound Plant and will consist of at least the following volumes:

1. Groundwater Data: February 1987 - July 1990
2. Geologic Log and Well Information
3. Radiologic Site Survey
4. Engineering Map Series
5. Topographic Map Series
6. Photo History
7. Waste Management
8. Environmental Monitoring Data
9. Bibliography
10. Permits and Enforcement Actions
11. Spills and Response Actions

1.1. SCOPE OF REPORT

This report provides a summary of past and present permits and registrations requested and received by Mound Plant, as well as summaries of enforcement actions. As a government-owned, contractor-operated facility, Mound Plant must operate in compliance not only with Executive Orders and Orders of the DOE (formerly the Atomic Energy Commission, under the Atomic Energy Act (AEA) (42 U.S.C. 2201 et seq.)) but also with federal and state statutes and regulations and corporate policies. This report summarizes only those activities relating to compliance of federal, state, and county environmental regulations and statutes.

The list of current permits and registered operations presented in this report was obtained from the DOE Dayton Area Office (DAO). A listing of compliance inspections and other enforcement actions was obtained from EG&G Mound Applied Technologies (EG&G-MAT). Data for historical operations was obtained by a review of records on file in the offices of waste management and environmental control.

Although permits are issued to stipulate conditions of discharges, discussions of permit limitations and monitoring results are beyond the scope of this paper. Copies of permits of interest are included in Appendix A. Results of compliance monitoring for air and surface water effluents, including analytical results, excursions from permitted limits, and radiation dose calculations are published annually in the Mound Plant - Annual Environmental Monitoring Reports (e.g., EG&G 1989a). Tabulated data of environmental levels of radionuclides from Mound Plant can also be found in the Site Scoping Report: Volume 8 - Environmental Monitoring Data (DOE 1991a). Results of compliance monitoring for hazardous and mixed waste treatment, storage, and disposal are published annually in the Mound Plant-Waste Management Plans (e.g., EG&G 1989b).

2. SUMMARY OF PERMITS AND REGISTRATIONS

Mound Plant has maintained an environmental monitoring program that dates to the beginning of operations in 1948. Radiation safety in the work place was the focus of the program, but environmental surveillance of the surrounding community and Great Miami River was also routinely conducted (DOE 1991c). With the passage of increasingly complex federal and state environmental regulations, Mound Plant has worked to maintain compliance. Since the early-to-mid 1970s, Mound Plant has maintained permits required under regulations of the Clean Air Act (CAA), the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA). Table II.1 lists the active and historic permits under these statutes. Many permit applications were given registration status and were not officially permitted. Registrations are those operations of very small air contaminant sources that do not require a permit to operate, as notified by the Director of the OEPA. Registration status does not reduce the legal obligation to comply with applicable regulations. Table II.2 lists the operations that are registered. The number of registrations held exceeds the number of permits; many registered operations were originally permitted.

2.1. PERMITS AND REGISTRATIONS UNDER THE CLEAN AIR ACT

The majority of permits and registrations held by Mound Plant are under the CAA (42 U.S.C. 7401 et seq.). The DOE and Mound Plant have maintained permits and registrations under the CAA since 1970. The facility ID number is 0857091196. Permits and registrations are currently issued through the OEPA. Open burning is permitted by the Regional Air Pollution Control Agency (RAPCA).

Historically, Mound Laboratory, as it was then known (DOE 1991c), cooperated with the Montgomery County Combined Health District (MCCHD) Department of Health by supplying source and stack emission data when requested (Auberle 1970b; Hebb 1970). In 1970, in conjunction with the CAA, the MCCHD passed regulations that prohibited open burning without a permit or variance. On June 9, 1970, Mound Plant administration issued instructions to stop open burning of trash and began a solid waste landfill and construction of a refuse incinerator (Ryan 1970; Hebb and Ryan 1970a, 1970b). Thus began the regulatory and permit process that continues today. Liquid wastes were segregated and disposed of offsite by a local contractor (DOE 1991c). Permits for the open burning of explosives wastes and firefighter training were first issued by the MCCHD in July 1970 (Appendix A).

In the early 1970s, the disposal of solid wastes was more troublesome. A refuse waste incinerator was built at Building 51 and permitted March 24, 1972, along with a paper incinerator that destroyed classified wastes. The permit (Appendix A) for the paper incinerator was never renewed, as it was

Table II.1. Historical and Active Permits

Number	Permit Title	Start	End	Comments
0857091196K001	Paint Spray Booth-Paint Shop (Dry)	09/22/89	09/22/92	Active
0857091196L001	Vapor Degreasers #1	01/26/90	01/26/93	Active
0857091196L002	Vapor Degreasers #2	01/26/90	01/26/93	Active
0857091196P006	Prep of Asbestos Filled DAP Bldg 29	06/02/89	06/01/92	Active, Originally Effective 01/24/86
No Number	Open Burning/Fire Fight Training	10/29/91	10/29/92	Active, Originally Effective 03/24/72
No Number	Open Burning/Explosives Wastes	09/03/91	09/03/92	Active, Originally Effective 03/24/72
23	Construction of Incinerator	03/24/72	05/27/72	Permit to Install Refuse Incinerator (Bldg 51)
100	Operation of Incinerator	03/24/72	12/31/72	Refuse Incinerator (Bldg 51)
101	Operation of Incinerator	03/24/72	12/31/72	Classified Paper Incinerator (Not renewed)
No Number	Open Burning/Container Test Facility (oil burn structure)	06/23/72	12/71/72	Permit to Test Burn
(OH0009857) 1100005 • CD	NPDES	09/28/90	10/01/91	Active, Renewal Submitted 03/27/91
OH6890008984	RCRA Part A & B	05/23/90		Interim status, Part B Submitted 10/11/91
0857091196B001	92.5 MMBTUH Oil-Gas Fired Boiler	06/20/77	06/19/80	To Registration 06/20/80
0857091196G001	Above Ground Fuel Dispensing Facility	04/15/88	04/15/91	To Registration 04/16/91
0857091196P003	Misc Maint Equip Bldg 33	04/27/74	02/18/77	To Registration 05/20/77
0857091196P004	Fabrication & Repair Equip Carpentry	04/27/74	05/20/77	To Registration 05/20/77
0857091196P007	Glass Melter Furnace R&D	03/14/88		R&D Pending RCRA Permit
0857091196R001	Water Wash Spray Booth (Wet)	04/27/74	03/30/84	To Registration 03/30/84
0857091196B006	Gas/Oil Fired Boiler #2	06/13/84		Permit to Install
0857091196G001	Above Ground Fuel Dispensing Facility	10/08/86		Permit to Install
0857091196K001	Paint Spray Booth-Paint Shop (Dry)	06/29/88		Permit to Install
0857091196P007	Glass Melter Furnace R&D	03/19/86		Permit to Install
0857091196B002	Gas/Oil Fired Boiler	04/27/77	02/18/77	To Registration 05/20/77
0857091196B003	Gas/Oil Fired Boiler	04/27/77	02/18/77	To Registration 05/20/77
0857091196B004	Gas/Oil Fired Boiler	04/27/77	02/18/77	To Registration 05/20/77
0857091196B005	Gas/Oil Fired Boiler	04/27/77	02/18/77	To Registration 05/20/77

Table II.2. Historical and Active Registrations

Number	Title	Start	Comments
0857091196B001	92.5 MMBTUH Oil-Gas Fired Boiler	06/20/80	From Permit 06/20/80 Active
0857091196B006	Gas/Oil Fired Boiler #2	11/30/84	Active
0857091196F001	Plant Roadways and Parking Lots	01/17/86	Active
0857091196G001	Above Ground Fuel Dispensing Facility	04/16/91	From Permit 04/16/91 Active
0857091196P001	Misc Grinding Equipment	07/05/76	Active
0857091196P002	Machining Equipment	07/05/76	Cancelled 08/14/91
0857091196P004	Fabrication & Repair Equip Carpentry	07/04/77	Cancelled 09/09/91
0857091196P005	Oil Burn Structure, Test Purposes	07/05/76	Cancelled 09/09/91
0857091196T001	Underground Storage Tank, Day Tank 1	03/24/89	Active
0857091196T002	Underground Storage Tank, Day Tank 2	03/24/89	Active
0857091196T003	Underground Storage Tank, Day Tank 3	03/24/89	Active
0857091196T004	Underground Storage Tank, Day Tank 4	03/24/89	Active
0857091196B002	Oil-Gas Fired Boiler	07/04/77	Cancelled 02/03/84
0857091196B003	Oil-Gas Fired Boiler	07/04/77	Cancelled 02/03/84
0857091196B004	Oil-Gas Fired Boiler	07/04/77	Cancelled 02/03/84
0857091196B005	Oil-Gas Fired Boiler	07/04/77	Cancelled 02/03/84
0857091196P003	Misc Maint Equip Bldg 33	07/04/77	Cancelled 02/03/84
0857091196R001	Water Wash Spray Booth (Wet)	03/30/84	Cancelled 01/25/88

replaced by a shredder process. The permit for the refuse incinerator at Building 51 may have been renewed for one year, but no record of the renewal was found during the research for this report. Emissions from the refuse incinerator could not be brought into compliance with OEPA regulations and recommendations for cessation of operations was given in November 1973 (Westendorf 1973). As a result, beginning in November 1973, collection of non-radioactive, non-combustible waste replaced landfilling (Garbe 1973a, 1973b). A program of recycling and reclamation began in phases: Phases I and II eliminated 80 to 85 percent of the combustible solid waste then being incinerated; and Phase III, targeted for February 15, 1974, eliminated the remainder and the need for incineration (Wolfe 1973; Ricks 1973).

Under the letterhead of RAPCA, permits for open burning of explosives wastes, and firefighter training were issued in March 1972. These have been renewed annually since then, although some conditions have changed. Until 1976, the permits were separate; beginning in 1977, a single permit to burn was issued for both operations. In 1990 the two were again separated; hence, some older documents will reference five permits, and others will reference six permits (see below). In June 1972, the request for permit for open burning at the container test facility (also known as the oil burn structure) was denied (Smith 1972). Complete revamping of the procedure was recommended to improve combustion efficiency and reduce the smoke emissions. After engineering changes, the facility received registration status in 1976.

Currently Mound Plant has five active permits for opening burning, vapor degreasers, asbestos preparation and the paint shop operation (Table II.1). The primary source of nonradioactive airborne emissions is the steam power plant, normally fueled with natural gas, but supplemented with fuel oil (EG&G 1991). Permits for the power plant boilers were downgraded to registration status in 1977. The boiler registrations were then cancelled in 1984. The paint shop is currently permitted to operate a dry spray booth, but it historically included a water wash spray booth. The permit for the latter was reduced to registration status in 1984. The registration was then cancelled in 1988 after the equipment was dismantled. The permit for preparation of asbestos materials at Building 29 is active at this writing, but will not be renewed, as the process is not needed.

Although not permitted, radioactive airborne emissions are regulated under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR 61 Subpart H - National Emissions Standards for Emissions of Radionuclides Other Than Radon from Department of Energy Facilities. Mound Plant computes and reports to EPA the results of environmental monitoring and modeling of the effective dose equivalent to the public using the AIRDOS-EPA and CAP-88 computer codes (EG&G 1989). Monitoring of environmental levels of radionuclides includes tritium and plutonium. A network of 15 offsite and five onsite stations has been maintained since 1970. Prior to that, air samples were

taken from a mobile sampler. The offsite sampling stations in the network have been maintained by the MCCHD since 1970; the onsite stations are maintained by Mound Plant. All samples are analyzed in laboratories at Mound Plant and results are published in the annual environmental monitoring reports (e.g., EG&G 1989a). At this writing, preliminary discussions have been held with EPA regarding full compliance with NESHAP. At least 40 permit applications are currently in progress. Mound Plant intends to use air effluent monitoring and dispersion data to demonstrate compliance (EG&G 1991).

2.2. PERMITS UNDER THE CLEAN WATER ACT

In order to comply with wastewater discharges under the Federal Water Pollution Control Act, as amended (also known as the CWA, 33 U.S.C. 1251 et seq.), Mound Plant was issued a National Pollution Discharge Elimination System (NPDES) permit by EPA Region V in June 1975. The facility ID number is OH0009857. The permit was reissued in December 1980. A public notice of the permit renewal was published jointly by EPA and OEPA in August 21, 1980 (EPA 1980). No comments are known to have been received as a result of this notice. The OEPA water quality standards were approved by EPA in May 1975, were amended in January 1985, and became effective April 1985. OEPA received authority to monitor the NPDES permits in July 1983. The NPDES permit was renewed for five years by OEPA in September 1985. A public notice of the permit renewal was published by the OEPA March 15, 1985 (OEPA 1985). No public comments are known to have been received as result of this notice. The permit renewal included an exception for total suspended solids that may result from increased stormwater runoff. The permit was again renewed by OEPA for a one-year period in September 1990, and renewal is pending at this writing. The permit includes four on-plant discharges and two outfalls to the Great Miami River. In accordance with the self-monitoring requirements of the permit, results of sampling and analysis are reported to OEPA monthly. Summaries of sampling are published annually in the environmental monitoring reports (e.g., EG&G 1991).

2.3. PERMITS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT

Since Mound Plant generates, treats and stores hazardous wastes regulated under RCRA (42 U.S.C. 6901 et seq.), a Notification of Hazardous Waste Activity (EPA Form 8700-12) was submitted to EPA Region V in November 1980. The facility ID number is OH 6890008984. The treatment and storage activities required the submission of a RCRA Part A Hazardous Waste Permit Application (EPA Form 3510-3) that was submitted in August 1980. In April 1981, Mound Plant submitted a photocopy of the federal permit application to OEPA. The Part A was revised several times: November 27, 1984, additional waste management information was submitted as requested and the acquisition of 124 acres of new property was included; January 11, 1985, two thermal treatment units (the glass melter furnace and the cyclone incinerator) were described; March 13, 1985, explosive wastes were

described that were treated on-plant; May 17, 1985, the hazardous waste storage Building 72 relocation was described; August 22, 1986, the cyclone incinerator was withdrawn from the application; November 6, 1986, the list of hazardous wastes was revised and mixed wastes included; and May 9, 1989, EG&G-MAT was identified as the new plant operator, replacing Monsanto Research Corporation (DOE 1991c). The revised Part A permit application was reviewed and approved by EPA Region V in early June 1989. On June 30, 1989, the State of Ohio was granted authorization by EPA to operate its program in lieu of the federal program.

November 22, 1986, Mound Plant submitted the RCRA Part B permit application. Among other facilities, the Part B permit application includes the glass melter furnace intended for use in burning hazardous and mixed wastes. At the request of OEPA, revised RCRA Part A and B permit applications were submitted in May 1990. These applications included a trial burn plan for the glass melter furnace. Following requests for additional information by OEPA, the Part B permit application was resubmitted in October 1991.

2.4. OTHER STATUTES AND REGULATIONS

Other regulations designed to provide environmental protection are followed at Mound Plant, but do not require formal permits. The Toxic Substance Control Act (TSCA) establishes a list of chemicals defined as toxic (15 U.S.C. 2605). Polychlorinated biphenyls (PCBs) and asbestos are included among these substances used at Mound Plant. Monthly inspections are made for PCB leaks and spills. Wastes are contained and labeled according to PCB marking and disposal regulations. Under the Safe Drinking Water Act (42 U.S.C. 300) OEPA categorizes the on-plant water supply as a major, noncommunity public water supply that must comply with sampling and analysis regulations. Sampling is performed quarterly and reported to OEPA. In-house guidelines for use and storage of pesticides and herbicides by Mound Plant actually are regulated by the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) (7 U.S.C. 136). The National Environmental Policy Act (42 U.S.C. 4231) requires construction and engineering activities to evaluate effects on historic and national landmarks, floodplains and wetlands, and threatened and endangered species. An environmental impact statement for plant operations was published in 1979 (DOE 1979).

3. SUMMARY OF ENFORCEMENT ACTIONS

Since the enactment of the myriad of environmental laws in the 1970s and 1980s, Mound Plant has submitted to reviews and inspections in compliance with permit applications and maintenance. Enforcement actions generally include "informal" actions such as warnings and notices of violations and notices of excursions from permitted limits. More "formal" actions include notices of noncompliance, administrative and compliance orders, and interagency agreements. The informal actions may be interpreted as advisories, whereas formal actions may be interpreted as bilateral agreements of corrective actions, such as a compliance agreement under RCRA or even the FFA under CERCLA.

The subsections that follow present summaries of results of compliance inspections, notices of violations, and other audits and assessments conducted at Mound Plant. These data are compiled from a database maintained by Mound Plant for all compliance actions conducted by DOE and other agencies. The database is designed to track the status of corrective measures required to maintain compliance. Information in the database is augmented in this report by records from the offices of waste management and environmental control. In keeping with the scope of this report, only those actions and responses related to the compliance of federal and state environmental regulations and statutes are included. Responses are considered complete if Mound Plant submitted a response to the agency that noted the finding. If the agency accepted and acknowledged the corrective action, the entry is considered closed. If Mound Plant submitted a response, but it has not been acknowledged, then the action remains complete, but not closed. If Mound Plant has been unable to respond, the finding may remain open.

3.1. INSPECTIONS AND ENFORCEMENT ACTIONS UNDER THE CLEAN AIR ACT

Few records of inspection or enforcement of air emission permits were found during the records search for this report. In July 1970, the Air Resources-Regional Project (apparently reorganized as RAPCA) requested that Mound Plant review operations in view of the Montgomery County Combined General Health District Air Pollution Control Regulations and submit within five days a response for bringing any sources into compliance (Auberle 1970a). Mound Plant submitted data and other requested specifications and began the permit application process for permitting open burning. In 1972, the MCCHD, notified Mound Plant that permit applications for the refuse and security incinerators had not been filed on time and ordered the plant to stop using these facilities. Permit applications were filed shortly thereafter and the incinerators were permitted as requested (Table III.1, Appendix A). An inspection of asbestos removal in 1984 by RAPCA resulted in an order to stop asbestos removal until proper notification of the agency was performed (Table III.1). The action was resolved by improved communication between Mound Plant and the agency.

Table III.1. Summary of Inspections and Other Enforcement Actions Under the Clean Air Act

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status ^a	Date
ARRP	7/8/70	Request for data	<ul style="list-style-type: none"> Review of operations for compliance Plan for compliance 	Montgomery County Health District APC Regulations (unspecified)	Submit drawings, specifications, and reports as required	Complete	7/13/70
RAPCA	1/3/71	Review of permit	Notice to cease operation <ul style="list-style-type: none"> Failure to submit permit applications for installation and operation of incinerators 	Montgomery County Combined Health District APC Regulations Section 124.53	Submit permit applications	Closed	3/24/72
RAPCA	6/12/84	Asbestos Inspection	Notice of violation and notice to cease removal <ul style="list-style-type: none"> lack of written notification improper labels 	HAPCR #150	Notify RAPCA at soonest instance Prepare new labels	Closed Complete	7/11/84

^a"Complete" indicates Mound Plant submitted a response. "Closed" indicates the agency accepted and acknowledged the corrective action.

APC air pollution control (regulation)
 ARRP Air Resources-Regional Project
 HAPCR hazardous air pollution control regulation
 RAPCA Regional Air Pollution Control Agency

3.2. INSPECTIONS AND ENFORCEMENT ACTIONS UNDER THE CLEAN WATER ACT

Under the CWA (33 U.S.C. 1251 et seq.), Mound Plant submits monthly reports of results of self monitoring to OEPA, as stipulated in the NPDES permit. OEPA has submitted notices of violations and excursions from permitted limits as a result of reviews of Mound Plant's self monitoring program. A review of Table III.2 indicates that most of these have been insignificant violations for total suspended solids, fecal coliform and biochemical oxygen demand (MRC 1985; EG&G 1991) and rarely for organic contamination. A few significant violations were noted for chromium and total suspended solids. Since the NPDES permit conditions require monthly reports, the lack of entries on Table III.2 indicates that Mound was in compliance for all months that violation notices were not recorded. In February 1985, the DOE DAO negotiated a "Director's Final Findings and Orders" with OEPA pursuant to Section 6111.03(H) of the Ohio Revised Code for reissuance of the NPDES permit. DOE agreed to and was bound to comply with the schedule for corrective actions and submission of monitoring of total suspended solids and other requirements set forth in the attachment (DOE 1985). Since the violations for total suspended solids were due mostly to weather, exceptions were allowed for increased stormwater runoff. Mound Plant also constructed new control facilities to comply with the order. Table III.2 shows that compliance inspections conducted since 1985 have indicated that Mound maintains compliance with only minor exceptions.

3.3. INSPECTIONS AND OTHER ENFORCEMENT ACTIONS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT

Since Mound Plant filed its application to treat, store, and dispose of hazardous wastes under RCRA (42 U.S.C. 6901 et seq.) in 1981, many inspections have been conducted by both EPA and OEPA. These inspections have noted both compliance and noncompliance violations (Table III.3). Most recently, OEPA conducted an inspection in January 1991 to verify corrections of violations cited in 1990. As a result of this inspection, Mound Plant received a letter on February 4, 1991, stating that it is currently in compliance with both state and federal hazardous waste regulations (EG&G 1991). At this writing, Mound Plant operates in interim status to store and dispose of hazardous and mixed wastes.

As with most nuclear facilities, one of the most demanding problems for Mound Plant under RCRA is the issue of treatment and storage of mixed waste, i.e., waste containing both hazardous and radioactive constituents. Although the State of Ohio received final authorization for its RCRA program in 1989, this did not include mixed waste. EPA and the Nuclear Regulatory Commission (NRC) share jurisdiction over mixed wastes. The EPA regulating the hazardous aspects and the NRC regulating the radioactive aspects. To address these situations, EPA generally coordinates the permitting of facilities

Table III.2. Summary of Inspections and Other Enforcement Actions Under the Clean Water Act

Agency	Date of Action ^a	Action	Finding	Reference Code or Regulation	Response	Status ^b	Date
OEPA	10/83	Review of NPDES Self Monitoring Report	Notice of noncompliance with significant violation dated 12/13/83 <ul style="list-style-type: none"> • Suspended solids 	ORC Chapter 6111	Review process and continue monitoring	Complete	NA
OEPA	11/83	Review of NPDES Self Monitoring Report	Notice of significant violation dated 1/10/84 <ul style="list-style-type: none"> • Chromium • Chlorine • Suspended solids • Dissolved solids 	ORC Chapter 6111	Review process and continue monitoring	Complete	NA
OEPA	3/84	Review of NPDES Self Monitoring Report	Notice of violation dated 5/11/84 <ul style="list-style-type: none"> • Dissolved solids • Suspended solids 	ORC Chapter 6111	No response required	Closed	NA
OEPA	4/84	Review of NPDES Self Monitoring Report	Notice of violation dated 6/6/84 <ul style="list-style-type: none"> • Suspended solids 	ORC Chapter	No response required	Closed	NA
OEPA	6/84	Review of NPDES Self Monitoring Report	Notice of violation dated 8/7/84	ORC Chapter 6111	No response required	Closed	NA
OEPA	7/84	Review of NPDES Self Monitoring Report	Notice of violation dated 9/18/84 <ul style="list-style-type: none"> • Suspended solids • Fecal coliform • Nickel 	ORC Chapter 6111	No response required	Closed	NA
OEPA	8/84	Review of NPDES Self Monitoring Report	Notice of violation dated 10/15/84 <ul style="list-style-type: none"> • Suspended solids 	ORC Chapter 6111	No response required	Closed	NA
OEPA	9/84	Review of NPDES Self Monitoring Report	Notice of violation dated 11/6/84 <ul style="list-style-type: none"> • Suspended solids • pH • Chlorine 	ORC Chapter 6111	No response required	Closed	11/6/84

Table III.2. (page 2 of 3)

Agency	Date of Action ^a	Action	Finding	Reference Code or Regulation	Response	Status ^b	Date
OEPA	10/84	Review of NPDES Self Monitoring Report	Notice of violation dated 12/11/84 <ul style="list-style-type: none"> • Suspended solids 	ORC Chapter 6111	No response required	Closed	12/11/84
OEPA	11/84	Review of NPDES Self Monitoring Report	Notice of violation dated 1/14/85 <ul style="list-style-type: none"> • Suspended solids 	ORC Chapter 6111	No response required	Closed	1/14/85
OEPA	12/3/84	NPDES Inspection	Notice of compliance with permit provisions dated 1/24/85	NPDES Permit	NA		
OEPA	12/84	Review of NPDES Self Monitoring Report	Notice of violation dated 2/5/85 <ul style="list-style-type: none"> • Suspended solids 	ORC Chapter 6111	No response required	Closed	2/5/85
OEPA	2/7/85	Final Findings and Orders	<ul style="list-style-type: none"> • Permit renewal • Excess total suspended solids 	ORC Section 6111.03(H)	Submitted signed order New permit issued to allow for stormwater exceptions	Closed	2/15/85
OEPA	7/16/87	NPDES Inspection	Notice of compliance with minor exception dated 9/10/87	NPDES Permit	Provide additional information	Complete	8/24/87
OEPA		Quality Assurance Evaluation	Notice of 100% rating (all analyses acceptable) dated 1/12/88	NPDES Permit Sampling and Analysis	NA		
OEPA	4/14/88	NPDES Inspection	Notice of compliance dated 6/29/88	NPDES Permit	NA		
OEPA	4/19/89	NPDES Inspection	Notice of compliance with exceptions dated 7/18/89 <ul style="list-style-type: none"> • Total toxic organics exceeded permit limit • Report lacking that describes oil-water separator recently installed for wastewater treatment 	NPDES Permit conditions NPDES Permit conditions	Control plating shop access and discharges Prepare and submit required report	Complete Complete	6/14/89 7/28/89

Table III.2. (page 3 of 3)

Agency	Date of Action ^a	Action	Finding	Reference Code or Regulation	Response	Status ^b	Date
OEPA	6/6/90	NPDES Inspection	Notice of satisfactory rating with two minor points dated 7/6/90				
			<ul style="list-style-type: none"> • Thermometer lacking in sample refrigerator 	NPDES Permit conditions	Install thermometer	Complete	8/1/90
			<ul style="list-style-type: none"> • Floating material noted in clarifier surface 	NPDES Permit conditions	Explained to OEPA that floating material in clarifier does not affect effluent quality since downstream treatment removes it. Obtain agency closure	Complete	8/1/90
OEPA	Unknown	Request for action plan	Minimum free chlorine in drinking water	OAC 3745-83-02(B) OAC 3745-83-02(C)	Request variance from chlorine regulation	Open	9/11/90

^aMound Plant was in compliance for all months that violation or noncompliance notices were not recorded for review of self-monitoring reports.

^b"Complete" indicates Mound Plant submitted a response. "Closed" indicates the agency accepted and acknowledged the corrective action.

- NA not applicable
- NPDES National Pollutants Discharge Elimination System
- OEPA Ohio Environmental Protection Agency
- ORC Ohio Revised Code

Table III.3. Summary of Inspections and Other Enforcement Actions Under the Resource Conservation and Recovery Act

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status ^a	Date
EPA	7/22/81	RCRA Inspection	Notice of compliance dated 9/23/81		NA		
OEPA	12/2/83	RCRA Inspection	<ul style="list-style-type: none"> • Failure to have permit for hazardous waste management • Failure to maintain aisle space • Failure to have updated contingency plan • Failure to have Annual Report signed by facility representative • No estimated date of closure in closure plans • Failure to have permit for treatment (open burning) of explosive wastes 	OAC 3745-52-34(B)	Address OEPA comments on Part B	Complete	10/11/92
				OAC 3745-65-35	Provided adequate aisle space	Closed	2/29/84
				OAC 3745-65-51 OAC 3745-65-53	Revised contingency plan submitted	Closed	2/29/84
				OAC 3745-65-75	Requested return of report for signature	Open	
				OAC 3745-66-12(A)(4)	Add date to plans	Closed	2/29/84
				OAC 3745-68-82	Address OEPA comments on Part B	Complete	10/11/92
Ohio Attorney General	12/18/84	Notice of Intent to File Suit	<ul style="list-style-type: none"> • Lack of state permit to store and treat hazardous waste from 10/9/80 through 12/18/84 • Failure to include all specified contents in contingency plan from 4/15/81 through 12/18/84 • Failure to provide copy of contingency plan to local emergency response units from 4/15/81 through 12/18/84 • During 1981, failure to submit annual report to OEPA • Failure to include expected date of closure and schedule in closure plan from 4/15/81 to unknown date 	OAC 3734.02(E)(F) OAC 3734-05(B) OAC 3745-50-40 40 CFR 270.10	Meeting to discuss issues; lawsuit never filed in court	Complete	6/25/85
				40 CFR 265.51(a) 40 CFR 265.52 OAC 3745-65-51(A) OAC 3745-65-52	Revise plan	Closed	2/29/84
				40 CFR 265.53 OAC 3745-65-53	Revise and submit plan	Closed	2/29/84
				OAC 3745-65-75	Requested return of report for signature	Open	
				40 CFR 265.112(a)(4) OAC 3745-66-12(A)(4)	Add date to plan	Closed	2/29/84

Table III.3. (page 2 of 5)

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status*	Date
Ohio Attorney General (cont.)	12/18/84		<ul style="list-style-type: none"> Failure to file timely Part A permit applications 	40 CFR 270.10(e) OAC 3745-50-40	Submit revised Part A	Complete	5/17/85
			<ul style="list-style-type: none"> Failure to sign Part A permit applications 	40 CFR 270.11 OAC 3745-50-42	Submit revised Part A	Complete	5/17/85
			<ul style="list-style-type: none"> Failure to complete, sign, and submit hazardous waste permit applications from 4/19/81 through 12/18/84 	40 CFR 270.10 OAC 3745-50-41			
			<ul style="list-style-type: none"> Failure to include all required information in Part A 	40 CFR 270.13(i)(j) OAC 3745-50-43(A)(6)(7)	Submit revised Part A	Complete	5/9/89
EPA	1/28/87	RCRA Inspection	Notice of compliance dated 3/9/87	40 CFR 285	NA		
OEPA	9/17/87	RCRA Inspection	Notice of violation dated 9/22/87				
			<ul style="list-style-type: none"> Failure to document receipt of contingency plans by local authority 	OAC 3745-65(B)	Request and receive receipts	Closed	11/13/87
			<ul style="list-style-type: none"> Failure to determine clean closure levels in closure plans 	OAC 3745-66-12	Insert required information into plan	Closed	11/13/87
			<ul style="list-style-type: none"> Failure to indicate that closure will be certified by non-affiliated PE 	OAC 3745-66-15	Have PE certify closure plans	Closed	11/13/87
OEPA	11/23/87	RCRA Inspection	Notice of compliance with mixed waste storage dated 11/23/87		NA		
EPA	4/20/88	RCRA Inspection	Notice of compliance with Subtitle C dated 6/18/88	40 CFR 260-265, 268, and 270	NA		
OEPA	8/24/88	RCRA Inspection	Notice of violation dated 8/26/88				
			<ul style="list-style-type: none"> Failure to follow comprehensive inspection plan 	OAC 3745-65-15 40 CFR 265.15	Submit weekly inspection logs	Closed	10/31/88
			<ul style="list-style-type: none"> Revision needed for training program 	OAC 3745-65-15(A)(B)(C) 40 CFR 265.16(a)(b)(c)	Provide training	Closed	10/31/88

Table III.3. (page 3 of 5)

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status ^a	Date
OEPA (cont.)	8/24/88		<ul style="list-style-type: none"> Inadequate aisle space 	OAC 3745-65-35 40 CFR 265.35	Propose aisle space	Closed	5/4/89
			<ul style="list-style-type: none"> Revise contingency plan 	OAC 3745-65-52(d) 40 CFR 265.51	Revise plan	Closed	10/31/88
			<ul style="list-style-type: none"> Failure to maintain operating record 	OAC 3745-65-73(A) 40 CFR 265.73	Update records	Closed	10/31/88
			<ul style="list-style-type: none"> Revise closure plans to define clean 	OAC 3745-66-12 40 CFR 265.112	Revise plan	Closed	10/31/88
OEPA	9/12/89	RCRA Inspection	<ul style="list-style-type: none"> Notice of violation dated 9/25/89 				
			<ul style="list-style-type: none"> Improper storage of unknown wastes, Bldg. 72 	OAC 3745-52-11	Submit policy and inventory evaluation schedule	Complete	10/26/89
			<ul style="list-style-type: none"> Improper storage of incompatible wastes, Bldg. 72 	OAC 3745-66-77	Submit compatibility date and separate procedure	Complete	10/26/89
			<ul style="list-style-type: none"> Inadequate inspection frequency and documentation, Magazine 53 	OAC 3745-66-74 OAC 3745-65-15	Submit inspection forms and schedule	Complete	10/26/89
			<ul style="list-style-type: none"> Inconsistent and inadequate records for burn area 	OAC 3745-65-73	Submit plan for recordkeeping system	Complete	10/26/89
			<ul style="list-style-type: none"> Training and documentation lacking 	OAC 3745-65-16	Provide training and submit documentation	Complete	10/26/89
<ul style="list-style-type: none"> Waste analysis plan, contingency plan, and closure plans not provided for Agency review 	OAC 3745-65-13(B) OAC 3745-65-52 OAC 3745-66-12	Submit analysis and closure plans; awaiting return of confidentiality statement	Open	1/18/90			
EPA	9/28/89	RCRA Inspection	<ul style="list-style-type: none"> Notice of violation dated 6/12/90 				
			<ul style="list-style-type: none"> Failure to determine applicable waste prohibition 	40 CFR 268.33(f), 40 CFR 268.34(h)	Provide LDR training and add staff	Closed	10/17/90
			<ul style="list-style-type: none"> Failure to submit LDR demonstration to Regional Administration 	40 CFR 268.8(a)(2)	Await Agency concurrence that citation was in error	Closed	10/17/90

Table III.3. (page 4 of 5)

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status ^a	Date
EPA (cont.)	9/28/89		<ul style="list-style-type: none"> • Failure to list facilities contacted 	40 CFR 268.8(a)(2)	Await Agency concurrence that citation was in error	Complete	7/18/90
			<ul style="list-style-type: none"> • Failure to send LDR demonstration to receiving facility 	40 CFR 268.8(a)(3)	Await Agency concurrence that citation was in error	Complete	7/18/90
			<ul style="list-style-type: none"> • Failure to dispose of LDR mixed waste within one year 	40 CFR 268.50(c)	Await Agency concurrence that citation was in error	Closed	10/17/90
			<ul style="list-style-type: none"> • Failure to maintain records 	40 CFR 265.73	Await Agency concurrence that citation was in error	Withdrawn	6/25/90
OEPA	7/30/90	RCRA Inspection	Notice of violation dated 8/14/90				
			<ul style="list-style-type: none"> • Failure to file an exception report 	OAC 3745-52-42 (A)(B)	File exception report with state/federal EPA	Closed	11/2/90
			<ul style="list-style-type: none"> • Failure to maintain required aisle space 	OAC 3745-65-35	Provide required aisle space	Closed	11/2/90
			<ul style="list-style-type: none"> • Failure to list address of primary emergency coordinator in contingency plan 	OAC 3745-65-52(D)	Include coordinator address in plan	Closed	11/2/90
			<ul style="list-style-type: none"> • Failure to include evacuation plan for Buildings 23 and 72 in contingency plan 	OAC 3745-65-52(F)	Include evacuation plan in contingency plan	Closed	2/4/91
<ul style="list-style-type: none"> • Failure to submit all revisions of contingency plans to appropriate local emergency agencies 	OAC 3745-65-53(B)	Submit revised plan to emergency groups	Closed	2/4/91			
OEPA for EPA	7/30/90	RCRA Inspection	Notice of compliance with LDRs dated 10/17/90		NA		
OEPA	8/16/90	RCRA Inspection	Notice of violation dated 11/2/90				
			<ul style="list-style-type: none"> • Accumulation start dates not shown on label of stored hazardous waste containers at less than 90-day storage areas in Bldgs. 27, M, and PS 	OAC 3745-52-34(A)(2)	Ensure that waste containers are properly labeled.	Closed	2/4/91

Table III.3. (page 5 of 5)

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status ^a	Date
OEPA (cont.)	8/16/90		• Drums labeled as hazardous waste had open bungs in Bldg. 27	OAC 3745-66-73(A)	Ensure that bungs are closed on containers of hazardous waste	Closed	2/4/91
			• One drum of hazardous waste outside of PS Bldg. was being stored longer than the allowed 90 days for that area	OAC 3745-52-34(B)	Ensure that stored waste meets facility storage time limits	Closed	2/4/91
			• Weekly inspection logs for 8/90 not provided for Bldgs. 27, M, and PS	OAC 3745-66-74(A)(B)	Provide weekly inspection logs requested	Closed	2/4/91
OEPA	7/23/91	RCRA Inspection	Notice of violation dated 8/1/91				
			• Containers not completely closed	OAC 3745-66-73(A)	Tighten clamps on drums	Complete	8/29/91
			• Inspection log incomplete	OAC 3745-65-15, 66-74	Change to duplicate records	Complete	8/29/91

^a"Complete" indicates Mound Plant submitted a response. "Closed" indicates the agency accepted and acknowledged the corrective action.

- CFR Code of Federal Regulations
- EPA U.S. Environmental Protection Agency
- LDR land disposal restrictions
- NA not applicable
- OAC Ohio Administrative Code
- OEPA Ohio Environmental Protection Agency
- PE professional engineer
- RCRA Resource Conservation and Recovery Act

with the NRC. The State of Ohio does claim jurisdiction over the hazardous portion of mixed wastes. The question of mixed wastes was the central issue behind the civil actions threatened by the Ohio Attorney General in the "Notice of Intent to File Suit for Hazardous Waste Violations" (Ohio 1984). The status of this lawsuit remains open, as it was never filed in court. In submitting its Part A permit application in November 1980, Mound Plant specifically assumed that mixed wastes were not covered by RCRA and were not included in the notification. On July 3, 1986, EPA promulgated a *Federal Register* notice that notified the public that wastes containing both hazardous and radioactive wastes were subject to RCRA regulation. Subsequently, Mound Plant's November 1986 Part A permit application modification included mixed wastes among the listed hazardous wastes.

The EPA conducted a Federal Facility Compliance with RCRA inspection in September 1989 and notified Mound Plant June 12, 1990, of violations of the land disposal restrictions (LDRs) of the Hazardous and Solid Waste Amendment Act (HSWA) of 1984 (Table III.3). HSWA (42 U.S.C. 6924(j)) prohibited the continued storage of LDR wastes unless it is solely to accumulate quantities necessary to facilitate proper treatment, recovery or disposal. In conjunction with other federal facilities, Mound Plant listed information on its specific LDR mixed waste noncompliance issues in the National Storage Report, submitted to EPA in Washington, D.C., January 1990. In a letter received in October 1990, EPA notified Mound Plant that it was in compliance with applicable LDR rules and regulations.

Recognizing that a serious storage and disposal problem exists nationwide, EPA issued a policy statement on August 29, 1991, announcing that civil enforcement of RCRA Section 3004(j) as it applies to mixed waste lacking treatment or disposal options will be given reduced priority in enforcement. The policy is effective until December 31, 1993. To qualify for the reduced priority, generators must, among other requirements, maintain strict inventory records, implement waste minimization plans, and make good-faith efforts to obtain treatment. Mound Plants's RCRA permit Part B application contains, among other items, application to operate a glass melter that would be used to treat its mixed waste.

3.4. ENFORCEMENT ACTIONS UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT

In 1981, Mound submitted to EPA a completed EPA Form 8900-1 to comply with the requirements for notification of hazardous waste sites (Blauvelt 1981). Subsequently, under Section 112(a) of CERCLA (42 U.S.C. 9601, et seq.), the State of Ohio submitted a demand letter seeking funds for the cleanup of plutonium in the Miami-Erie Canal (Ohio 1985). As set forth in that section of the statute, claims for compensation cannot be made against the fund established for cleanups, i.e., Superfund, without

first presenting the claim to the owner, operator, or guarantor of the facility from which the release took place. This claim for compensation also remains open, as it was never filed in court (Table III.4).

Pursuant to the statute of CERCLA (42 U.S.C. Sections 9605 and 9620, as amended by the Superfund Amendments and Reauthorization Act of 1986 Sections 105 and 120), the EPA scored contaminant releases to surface and groundwater at Mound Plant under the Hazard Ranking System (HRS) from data submitted by DOE in October 1987 (Themelis 1987). Scoring was conducted under "Uncontrolled Hazardous Waste Site Ranking System - A Users Manual (16 Federal Register 31219-31243, July 1982). The air route was not scored (DOE 1991b). Scoring was completed in August 1988 with an overall HRS score of 34.61. On the basis of the HRS scores, Mound Plant was among 27 federal facilities proposed for the NPL on July 14, 1989, (54 Federal Register 29820) and was placed on the NPL on November 21, 1989, as set forth in Appendix B of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR 300).

Pursuant to Sections 105 and 120 of CERCLA, the DOE and EPA entered into a FFA on August 7, 1990 (EPA Administrative Docket No. VW-'90-C-075). The agreement is enforceable against the statues of Sections 120(e)(1) and 120(e)(2) of CERCLA (42 U.S.C. Section 9620); Sections 6001, 3008(h), and 3004(u) and (v) of RCRA (42 U.S.C. Sections 6961, 6928, 6924, as amended by HSWA of 1984); Executive Order 12580; the National Environmental Policy Act (42 U.S.C. Section 4321); and the AEA of 1954, as amended (42 U.S.C. Section 2011 et seq.). The DOE and EPA are legally bound to the terms and conditions set forth in the agreement for remedial investigations, feasibility studies, and interim and final remedial actions (EPA 1990). The general purposes of the agreement are to

- to ensure that environmental impacts associated with past and present activities at the Site are investigated and appropriate remedial actions are taken to protect the public health, welfare and the environment;
- establish a procedural framework and schedule for developing, implementing, maintaining and monitoring appropriate response actions at the Site; and
- facilitate cooperation, exchange of information and participation of the parties involved in these actions.

3.5. OTHER INSPECTIONS AND ENFORCEMENT ACTIONS

Inspections by EPA for compliance with TSCA (15 U.S.C. 2601-2655) and FIFRA (7 U.S.C. 136-136y) have been performed within the last few years. In July 1988, Mound Plant received an advisory letter (Table III.4) notifying the facility of its obligation to comply with provisions under 40 CFR Part 761 promulgated pursuant to TSCA regarding storage of PCBs co-contaminated with radioactivity. The

Table III.4. Summary of Inspections and Enforcement Actions Under Other Statutes and Regulations

Agency	Date of Action	Action	Finding	Reference Code or Regulation	Response	Status*	Date
EPA	1/29/87	TSCA Inspection	Advisory letter dated 7/14/88 <ul style="list-style-type: none"> Storage for disposal of mixed wastes 	40 CFR 761.65	Submit "Bi-annual" report to EPA	Complete	8/8/88
					Update report	Complete	6/29/90
EPA	9/28/90	FIFRA	Notice of warning dated 3/27/91 <ul style="list-style-type: none"> Use of Restricted Use Pesticide 	Section 12(a)(2)(6)	Terminate use of pesticide and return to manufacturer	Complete	4/26/91
EPA	9/26/90	TSCA Inspection	Notice of noncompliance dated 4/3/91 <ul style="list-style-type: none"> Failure to include all PCB container data 	40 CFR 761.180(a)	Provide updated records	Complete	6/29/91
Ohio Attorney General	11/4/85	CERCLA 60-day demand letter for response costs and damages to natural resources	Release of plutonium-238 into soil and surface water on and near the facility in 1969	CERCLA Section 112(a)	Meeting with OEPA to discuss claim	Open	12/9/85
EPA	8/6/90	Finalized FFA			Sign FFA	Closed	8/6/90

*"Complete" indicates Mound Plant submitted a response. "Closed" indicates the agency accepted and acknowledged the corrective action.

- CERCLA Comprehensive Environmental Response, Compensation, and Liability Act
- CFR Code of Federal Regulations
- EPA U.S. Environmental Protection Agency
- FFA Federal Facility Agreement
- FIFRA Federal Insecticide, Fungicide, and Rodenticide Act
- OEPA Ohio Environmental Protection Agency
- PCB polychlorinated biphenyl
- TSCA Toxic Substances Control Act

inspection indicated that Mound Plant failed to include an inventory of all PCB containers in storage. The response included a review of all PCB containers in storage and a review of inventory records and the submittal of inventory summaries to the regulatory agency. An inspection under FIFRA on September 18, 1990, resulted in a notice of warning letter in March 1991, stating that the use of a restricted use pesticide must cease (Table III.4). Since the pesticide was actually in storage and not in use, its return to the manufacturer was documented and submitted to EPA.

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APPENDIX A
PERMITS OF INTEREST

MONTGOMERY COUNTY OHIO GENERAL
HEALTH DISTRICT

PERMIT

#12

EXPIRES Upon Variance
Approval

FOR OPEN BURNING

NAME MONSANTO RESEARCH CORPORATION (Sohio Co)
ADDRESS P. O. Box 32
CITY

TRANSFERABLE

FEE
no charge

Miamisburg, Ohio

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licensor.

Rose A. Vogel, M.D.

Health Commissioner
Montgomery County Health Department
Dayton, Ohio 45407

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

Conditions of Licensure on Reverse Side

CONDITIONS OF LICENSURE

1. Burning is permitted only between the hours of 10:00 A.M. and 4:00 P.M.
2. No burning is permitted on Sundays.
3. Only Sohio Company "Stoddard Solvent" is to be burned and solely for the purpose of firefighting training.
4. Burning permit shall be terminated when final action has been taken on Variance Request.
5. This permit may be suspended upon periods of air stagnation upon verbal notice from Health Commissioner.

Starting Date: ~~July 6, 1970~~ Termination Date: Upon Variance Approval

MONTGOMERY COUNTY OHIO GENERAL
HEALTH DISTRICT

PERMIT

EXPIRES Upon Variance
Approval

FOR OPEN BURNING (Explosive)

MONTGOMERY RESEARCH CORPORATION

P. O. Box 12

Miamisburg, Ohio

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licensor.

Richard Vogel

Health Commissioner
Montgomery County Health Department
Dayton, Ohio 45402

FEE -
no charge

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

Conditions of Licensure on Reverse Side

1. Burning is permitted only between the hours of 10:00 A. and 4:00 P.M.
No burning is permitted on Sundays.
 3. Only scrap materials containing explosives and scrap explosives are to be burned.
 4. Burning permit shall be terminated when final action has been taken on Variance Request.
 5. This permit may be suspended upon periods of air stagnation upon verbal notice from Health Commissioner.
- Starting Date: **6/19/70** Termination Date: Upon Variance Approval

MONTGOMERY COUNTY OHIO GENERAL HEALTH DISTRICT PERMIT

PERMIT NO.

23

EXPIRES May 27, 1972

FOR CONSTRUCTION OF INCINERATOR
NAME UNITED STATES ATOMIC ENERGY COMMISSION
ADDRESS Mound Road
CITY Miamisburg, Ohio

NOT TRANSFERABLE

FEE

60 00

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licenser.

Robert A. Vogel M.D.

Health Commissioner
Montgomery County Health Department
325 W. Second St., Dayton 2, Ohio

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

MONTGOMERY COUNTY OHIO GENERAL HEALTH DISTRICT

PERMIT

PERMIT NO.

100

EXPIRES December 31, 1972

FOR OPERATION OF INCINERATOR

NAME UNITED STATES ATOMIC ENERGY COMMISSION

ADDRESS Mound Road

CITY Miamisburg, Ohio

FEE
20 00

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licensor.

Robert A. Vogel, M.D.

Health Commissioner
Montgomery County Health Department
Dayton, Ohio 45402

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

MONTGOMERY COUNTY OHIO GENERAL HEALTH DISTRICT

PERMIT

PERMIT NO

101

EXPIRES December 31, 1972

FOR OPERATION OF INCINERATOR

NAME UNITED STATES ATOMIC ENERGY COMMISSION

ADDRESS Mound Road

CITY Miamisburg, Ohio

FEE

20 00

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licensor.

Roscoe A. Vogel, M.D.

Health Commissioner
Montgomery County Health Department
Dayton, Ohio 45402

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

MONTGOMERY COUNTY OHIO GENERAL HEALTH DISTRICT

PERMIT NO.

204

PERMIT

EXPIRES March 24, 1973

FOR OPEN BURNING

NAME UNITED STATES ATOMIC ENERGY COMMISSION

ADDRESS Mound Road

CITY Miamisburg, Ohio

NOT TRANSFERABLE

FEE

No charge

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licensor.

Robert A. Vogel, M.D.

Health Commissioner
Montgomery County Health Department
Dayton, Ohio 45402

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

Conditions of Licensure on Reverse Side

1. Permit issued to conduct routine fire training exercises.
2. Permit expires March 24, 1973.

MONTGOMERY COUNTY OHIO GENERAL HEALTH DISTRICT

PERMIT NO

205

PERMIT

FOR OPEN BURNING

EXPIRES March 24, 1973

NAME UNITED STATES ATOMIC ENERGY COMMISSION

ADDRESS Mound Road

CITY Miamisburg, Ohio

NOT TRANSFERABLE

FEE
No charge

This permit has been issued in accordance with the requirements of the Montgomery County Health Department regulations and is subject to revocation or suspension for cause and is not transferable without consent of the licensor.

Robert A. Vogel, M.D.

Health Commissioner
Montgomery County Health Department
Dayton, Ohio 45402

THIS PERMIT MUST BE DISPLAYED IN A CONSPICUOUS PLACE.

Conditions of Licensure on Reverse Side

1. Permit issued to dispose of hazardous material.
2. Permit expires March 24, 1973.



PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 01/26/90

Application No. 0857091196L001

Effective Date 01/26/90

Permit Fee \$100

This document constitutes issuance to:

U S DOE - MOUND
MOUND RD.
MIAMISBURG

OHIO 45342

of a permit to operate for:

OPEN TOP VAPOR DEGREASER #1
DEGREASER-M48

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

1. This permit to operate shall be effective until 01/26/93
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 reasonable 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:
TOLEDO ENVIRONMENTAL SERVICES AGENCY
26 MAIN ST.
TOLEDO, OH 43605 (419) 693-0350
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: 0857091196 L001
FACILITY NAME: Mound Laboratory
EQUIPMENT DESCRIPTION: Open Top Vapor Degreaser #1
COMPANY ID: Degreaser -M48

SPECIAL TERMS AND CONDITIONS

1. Approval to operate the above identified source is hereby granted subject to the conditions expressed herein and consistent with the materials and data included in the application filed by the company. Any departure from the conditions of this approval or the terms expressed in the application must receive prior written authorization of the local air agency (Regional Air Pollution Control Agency) and the Ohio Environmental Protection Agency.
2. The following rule(s) of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source: 3745-21-09(0)(3).
(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)
3. Each owner or operator of an open top vapor degreaser shall:
 - (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (b) Install and operate the following safety switches:
 - (i) A condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm;
 - (ii) A spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
 - (iii) A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and
 - (iv) A water flow switch, water pressure switch or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.

(CONTINUED)

- (c) Install and operate one of the following devices:
- (i) A freeboard with a freeboard ratio greater than or equal to 0.75, and if the open top vapor degreaser opening is greater than ten square feet, the cover must be powered or equipped with the mechanical features whereby it can be readily closed when the degreaser is not in use;
 - (ii) Refrigerated chiller;
 - (iii) Enclosed design (cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser);
 - (iv) Carbon adsorption system, with ventilation greater than or equal to fifty cubic feet per minute per square foot of air/solvent interface (when cover is open), and exhausting less than twenty-five parts per million of solvent averaged over one complete adsorption cycle; or
 - (v) A control system demonstrated to have control efficiency equivalent to or greater than any of the above, and approved by the Director; and
- (d) Operate and maintain the open top vapor degreaser in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.
4. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

Prepared by: Patricia L. Bradley
Date prepared: November 28, 1989

TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance **06/02/89**

Application No. **0857091196P006**

Effective Date **06/02/89**

Permit Fee **\$100**

This document constitutes issuance to:

**MOUND LABORATORY,
MOUND ROAD
MIAMISBURG,**

OHIO 45342

for a permit to operate for:

**PREPARATION OF ASBESTOS FILLED DAP
BLDG 29 - PLASTIC SHOP**

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

1. This permit to operate shall be effective until **06/01/92**.
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 reasonable 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.

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)

The appropriate Ohio EPA field office is:

**REGIONAL AIR POLLUTION CONTROL AGENCY:
451 WEST THIRD STREET
DAYTON, OH 45422 (513) 225-4437**

If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

U.S. ENVIRONMENTAL PROTECTION AGENCY



Director

APPLICATION NUMBER: 0857091196 P006
FACILITY NAME: Mound Laboratory
EQUIPMENT DESCRIPTION: Preparation of Asbestos Filled DAP
COMPANY ID: Bldg 29 - Plastic Shop

from 08/17/89

SPECIAL TERMS AND CONDITIONS

1. Approval to operate the above identified source is hereby granted subject to the conditions expressed herein and consistent with the materials and data included in the application filed by the company. Any departure from the conditions of this approval or the terms expressed in the application must receive prior written authorization of the local air agency (Regional Air Pollution Control Agency) and the Ohio Environmental Protection Agency.
2. The following rule(s) of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source: 40 CFR Part 61 subpart M. (This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)
3. Visible emissions from this source shall not exceed 0% opacity.
4. All asbestos containing waste shall be labeled, handled, and disposed of in accordance with 40 CFR Part 61 subpart M. The labels shall state:

CAUTION
CONTAINS ASBESTOS
AVOID OPENING OR BREAKING CONTAINER
BREATHING ASBESTOS IS HAZARDOUS TO
YOUR HEALTH

5. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

Prepared by: P. L. Bradley
Date prepared: 5/3/89



REGIONAL AIR POLLUTION CONTROL AGENCY
Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties
451 W. Third Street, P.O. Box 972, Dayton, Ohio 45422, (513) 225-4435

October 29, 1991

Mr. James A. Morley
Area Manager
U.S. Department of Energy
Dayton Area Office
P.O. Box 66
Miamisburg, OH 45343-0066

Dear Mr. Morley:

Your application to open burn for the purposes of fire training and disposal of explosive containing material has been reviewed and approved in accordance with OAC Rule 3745-19-03(D). This letter shall constitute your permit to open burn.

This permit shall be effective for one (1) year from the date of issuance. This permit is granted subject to the conditions listed below:

Fire Training Exercise

1. No more than three fire fighter training sessions shall take place in any one week.
2. Each burn shall be conducted using the least amount of fuel as possible to adequately perform training objectives.
3. Each training exercise shall be conducted as expeditiously and nuisance free as possible.
4. No burn shall be conducted during an air alert, warning, or emergency.
5. All burning shall take place Monday through Saturday between the hours of 8 a.m. and 6 p.m.
6. All fires must be completely extinguished at the end of the fire training exercise.

As always, if you have any questions or comments regarding this letter, please contact the undersigned.

Sincerely,

Thurman D. Smith
Air Pollution Control Specialist
Abatement Unit



REGIONAL AIR POLLUTION CONTROL AGENCY
Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties
451 W. Third Street, P.O. Box 972, Dayton, Ohio 45422. (513) 225-4435

September 3, 1991

Mr. James A. Morley
Area Manager
U.S. Department of Energy
Dayton Area Office
P.O. Box 66
Miamisburg, Ohio 45343-0066

Dear Mr. Morley:

Your application to open burn for the purposes of fire training and disposal of explosive containing material has been reviewed and approved in accordance with OAC Rule 3745-19-03(D). This letter shall constitute your permit to open burn.

This permit shall be effective for one (1) year from the date of issuance. This permit is granted subject to the conditions listed below:

Disposal of Explosive Material

1. No burn shall be performed using more than fifty pounds of explosive material.
2. All burning shall take place Monday through Saturday between the hours of 8 a.m. and 6 p.m.
3. Each burn shall be conducted as expeditiously and nuisance free as possible.
4. No burn shall be conducted during an air alert, warning, or emergency.

As always, if you have any questions or comments regarding this letter, please contact the undersigned.

Sincerely,

Thurman D. Smith
Air Pollution Control Specialist
Abatement Unit

TDS /bw



PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 09/22/89

Application No. 0857091196X001

Effective Date 09/22/89

Permit Fee \$100

This document constitutes issuance to:

U.S. DDE - MOUND
MOUND RD.
MIAMISBURG

OHIO 45342

of a permit to operate for:

PAINT SPRAY BOOTH-PAINT SHOP
MISC. SPRAY PAINTING: 073183

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

1. This permit to operate shall be effective until 09/22/92.
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 reasonable 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:
REGIONAL AIR POLLUTION CONTROL AGENCY
451 W. THIRD ST.
DAYTON, OH 45422 (513) 225-4437
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: 0857091196 K001
FACILITY NAME: U.S. D.O.E. - Mound
EQUIPMENT DESCRIPTION: Paint Spray Booth - Paint Shop
COMPANY ID: Misc. Spray Painting: 073183

SPECIAL TERMS AND CONDITIONS

1. Approval to operate the above identified source is hereby granted subject to the conditions expressed herein and consistent with the materials and data included in the application filed by the company. Any departure from the conditions of this approval or the terms expressed in the application must receive prior written authorization of the local air agency (Regional Air Pollution Control Agency) and the Ohio Environmental Protection Agency.
2. The following rule(s) of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source: 3745-31-05 and 3745-21-09(U)(2)(e). (This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)
3. The mass emissions from this source shall not exceed the following: 2.5 tons per year organic compound emissions.
4. Daily usage of paint and thinner shall not exceed 6.5 gallons.
5. U.S. D.O.E. - Mound shall maintain daily records which list the number of gallons of paint and thinner employed. These daily records shall be retained in the facility's files for a period of not less than two years and shall be made available to RAPCA or Ohio EPA upon request.
6. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

Prepared by: P. L. Bradley
Date prepared: 8/30/89

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 01/26/90

Application No. 0857091196L002

Effective Date 01/26/90

Permit Fee \$100

This document constitutes issuance to:

U S DOE - MOUND
MOUND RD.
MIAMISBURG

OHIO 45342

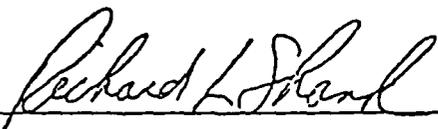
This is a permit to operate for:

OPEN TOP VAPOR DEGREASER #2
DEGREASER-M108

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

1. This permit to operate shall be effective until 01/26/93
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 reasonable 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:
REGIONAL AIR POLLUTION CONTROL AGENCY
451 W. THIRD ST.
DAYTON, OH 45422 (513) 225-4437
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: 0857091196 L002
FACILITY NAME: Mound Laboratory
EQUIPMENT DESCRIPTION: Open Top Vapor Degreaser #2
COMPANY ID: Degreaser-M108

SPECIAL TERMS AND CONDITIONS

1. Approval to operate the above identified source is hereby granted subject to the conditions expressed herein and consistent with the materials and data included in the application filed by the company. Any departure from the conditions of this approval or the terms expressed in the application must receive prior written authorization of the local air agency (Regional Air Pollution Control Agency) and the Ohio Environmental Protection Agency.
2. The following rule(s) of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source: 3745-21-09(0)(3). (This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)
3. Each owner or operator of an open top vapor degreaser shall:
 - (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
 - (b) Install and operate the following safety switches:
 - (i) A condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser coolant is either not circulating or too warm;
 - (ii) A spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;
 - (iii) A vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and
 - (iv) A water flow switch, water pressure switch or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored.

(CONTINUED)

- (c) Install and operate one of the following devices:
- (i) A freeboard with a freeboard ratio greater than or equal to 0.75, and if the open top vapor degreaser opening is greater than ten square feet, the cover must be powered or equipped with the mechanical features whereby it can be readily closed when the degreaser is not in use;
 - (ii) Refrigerated chiller;
 - (iii) Enclosed design (cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser);
 - (iv) Carbon adsorption system, with ventilation greater than or equal to fifty cubic feet per minute per square foot of air/solvent interface (when cover is open), and exhausting less than twenty-five parts per million of solvent averaged over one complete adsorption cycle; or
 - (v) A control system demonstrated to have control efficiency equivalent to or greater than any of the above, and approved by the director; and
- (d) Operate and maintain the open top vapor degreaser in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

4. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

Prepared By: Patricia L. Bradley
Date Prepared: November 22, 1989

OEPA Permit No. 11000005*CD

Application No. OH0009857

Effective Date: September 28, 1990

Expiration Date: October 1, 1991

OHIO ENVIRONMENTAL PROTECTION AGENCY

AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq. hereinafter referred to as "the Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111),

U.S Department of Energy

is authorized by the Ohio Environmental Protection Agency, hereafter referred to as "Ohio EPA", to discharge from the Mound Research Lab wastewater treatment works located at Mound Road, Miamisburg, Ohio, Montgomery County

and discharging to the Great Miami River via a storm sewer, and Miami-Erie Canal

in accordance with the conditions specified in Parts I, II and III of this permit.

This permit is conditioned upon payment of applicable fees as required by Section 3745.11 of the Ohio Revised Code.

This permit and the authorization to discharge shall expire at midnight on the expiration date shown above. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration.



Richard L. Shank, Ph.D.
Director

6908P

PART I. A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 11000005001. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING CODE/UNITS	PARAMETER	Concentration		Loading		Measurement Frequency	Sample Type
		30 DAY	DAILY	30 DAY	DAILY		

This discharge is limited to wastewater from stations 11000005601, 11000005602, 11000005603, and 11000005604.

PART I. A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 11000005601. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

001A

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING CODE/UNITS	PARAMETER	Concentration		Loading		Measurement Frequency	Sample Type
		Other Units (Specify)	30 DAY DAILY	kg/day	30 DAY DAILY		
00530 MG/L	Residue, Total Nonfilterable	15	30	-	-	2/Week	24 Hr. Comp.
00550 MG/L	Oil and Grease, Total	-	-	-	-	1/Qtr.	Grab
00610 MG/L	Nitrogen, Ammonia (NH ₃)	-	-	-	-	2/Month	24 Hr. Comp.
01027 UG/L	Cadmium, Total (Cd)	-	-	-	-	2/Year	Composite
01034 UG/L	Chromium, Total (Cr)	-	-	-	-	2/Year	Composite
01042 UG/L	Copper, Total (Cu)	-	-	-	-	2/Year	Composite
01051 UG/L	Lead, Total (Pb)	-	-	-	-	2/Year	Composite
01067 UG/L	Nickel, Total (Ni)	-	-	-	-	2/Year	Composite
01092 UG/L	Zinc, Total (Zn)	-	-	-	-	2/Year	Composite
31616 #/100ML	Fecal Coliform (Summer)	1000	2000	-	-	1/Week	Grab
31648 #/100ML	E. Coli (Summer)	-	-	-	-	1/Month	Grab
50050 MGD	Flow Rate	-	-	-	-	Daily	24 Hr. Total
50060 MG/L	Chlorine, Total Residual (Summer)	-	0.5	-	-	Daily*	Grab
71900 UG/L	Mercury, Total (Hg)	-	-	-	-	2/Year	Composite
80082 MG/L	Biochemical Oxygen Demand, Carb.	10	15	-	-	2/Week	24 Hr. Composite

* Except on days when the facility is not normally staffed. Report RM on the monthly report form for those days.

- The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored daily by grab sample.
- Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.

PART I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 11000005602. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

DO1 B

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
<u>REPORTING CODE/UNITS</u>	<u>PARAMETER</u>	<u>Concentration</u>		<u>Loading</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
		<u>Other Units (Specify)</u>	<u>30 DAY DAILY</u>	<u>kg/day</u>	<u>30 DAY DAILY</u>		
00335 MG/L	Chemical Oxygen Demand	-	-	-	-	1/Week	24 Hr. Comp.
00530 MG/L	Residue, Total Nonfilterable	30	45*	-	-	1/Week	24 Hr. Comp.
00550 MG/L	Oil and Grease, Total	-	10	-	-	1/Month	Grab
50050 MGD	Flow Rate	-	-	-	-	Daily	24 Hr. Total

* Since samples shall be representative of normal, not storm flow conditions, the effluent limitation for Total Suspended Solids shall not apply to a discharge during a normal work week in which rain equal to or greater than 1/4 inch per day occurs for three or more days. The operator must maintain a standard National Weather Service rain-gauge or its equivalent on the premises.

The operator must submit the following proof that the discharge or increase in the discharge was caused by the applicable precipitation event and that the sample of the discharge was collected during, or within 24 hours after, the applicable precipitation event.

1. Date, Duration (Time Begin/Time End) and total 24 hour accumulation (inches) of the precipitation event(s) which caused the discharge or increase in volume of the discharge.
2. Date and time of sample collection.

This information should be included in the "Additional Remarks" Section of Ohio EPA Report Form EPA-4500, or as an attachment to Form EPA-4500.

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored 1/week by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.

PART I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 11000005603. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

001c

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
<u>REPORTING CODE/UNITS</u>	<u>PARAMETER</u>	<u>Concentration</u>		<u>Loading</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
		<u>Other Units (Specify)</u>	<u>30 DAY</u>	<u>DAILY</u>	<u>30 DAY</u>		
00720 MG/L	Cyanide, Total	0.65	1.0	-	-	2/Month	Grab
01027 UG/L	Cadmium, Total (Cd)	-	100	-	-	2/Month	24 Hr. Comp.
01034 UG/L	Chromium, Total (Cr)	-	500	-	-	2/Month	24 Hr. Composite
01042 UG/L	Copper, Total (Cu)	-	500	-	-	2/Month	24 Hr. Comp.
01067 UG/L	Nickel, Total (Ni)	-	500	-	-	2/Month	24 Hr. Comp.
82090 UG/L	Total Toxic Organics	-	2130*	-	-	1/Qtr.	See Part II, Item E.

* This is a guideline-based limitation and is not an authorization to discharge toxic organic compounds at levels which cause or may cause water quality violations. The discharge of organic compounds at levels which cause or may cause water quality violations is prohibited.

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored 2/month by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.

PART I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 11000005604. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

mbsg well #2 (661 003)

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING CODE/UNITS	PARAMETER	Concentration		Loading		Measurement Frequency	Sample Type
		Other Units (Specify)	30 DAY	DAILY	30 DAY		
50050 MGD	Flow Rate	-	-	-	-	Daily	24 Hr. Estimate

This discharge is limited to uncontaminated groundwater only; no other wastewater is permitted.

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored 1/month by grab sample when discharging.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.

PART I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 11000005002. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

002

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
		Concentration		Loading		Measurement Frequency	Sample Type
REPORTING CODE/UNITS	PARAMETER	Other Units (Specify)	kg/day	30 DAY	DAILY		
00530 MG/L	Residue, Total Nonfilterable	30	45*	-	-	1/Week	24 Hr. Comp.
50050 MGD	Flow Rate	-	-	-	-	Daily	24 Hr. Comp.

* Since samples shall be representative of normal, not storm flow conditions, the effluent limitation for Total Suspended Solids shall not apply to a discharge during a normal work week in which rain equal to or greater than 1/4 inch per day occurs for three or more days. The operator must maintain a standard National Weather Service rain-gauge or its equivalent on the premises.

The operator must submit the following proof that the discharge or increase in the discharge was caused by the applicable precipitation event and that the sample of the discharge was collected during, or within 24 hours after, the applicable precipitation event.

1. Date, Duration (Time Begin/Time End) and total 24 hour accumulation (inches) of the precipitation event(s) which caused the discharge or increase in volume of the discharge.
2. Date and time of sample collection.

This information should be included in the "Additional Remarks" Section of Ohio EPA Report Form EPA-4500, or as an attachment to Form EPA-4500.

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored 1/week by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.

PART II, OTHER REQUIREMENTS

A. Description of the location of the required sampling stations are as follows:

<u>Sampling Station</u>	<u>Description of Location</u>
11000005001	Discharge pipe to Great Miami River (RM 65.9).
11000005002	At retention basin discharge prior to Miami-Erie canal.
11000005601	At treatment plant discharge, prior to mixing with 11000005602.
11000005602	At sampling station prior to mixing with 11000005601.
11000005603	At plating shop prior to discharge to sanitary sewer.
11000005604	At well prior to discharge to storm water.

B. This permit shall be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under sections 301(b)(2) (C), and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:

- (1) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- (2) Controls any pollutant not limited in the permit.

The permit as modified or reissued under this paragraph shall also contain any other requirements of the Act then applicable.

C. In the event the permittee's operation shall require the use of cooling water treatment additives, written permission must be obtained from the Ohio Environmental Protection Agency. The permittee shall demonstrate that the use of the additive in the concentrations expected will not be harmful or inimical to aquatic life as determined by acute static bioassays.

D. Permit limitations may be revised in order to meet water quality standards after a stream use determination and waste load allocation are completed and approved. This permit may be modified, or, alternatively, revoked and reissued, to comply with any applicable water quality effluent limitations.

E. Toxic Organic Pollutant Monitoring

At least two grab samples for volatile pollutants and either an 8-hour or a 24-hour composite sample for acid and base/neutral, and pesticide pollutants shall be obtained on each monitoring day. Wastewater samples shall be prepared and analyzed by GC-MS in accordance with U.S. EPA methods 624 and 625. (October 1984). In addition to the quantitative analysis for Total Toxic Organics, a reasonable attempt shall be made to identify and quantify any additional substances indicated to be present in the extracts by peaks on the reconstructed gas chromatograms (total ion plots) more than 10 times higher than the adjacent peak-to-peak background noise. Identification shall be by reference to the EPA/NIH computerized library of mass spectra, with visual confirmation by an experienced analyst. Quantification may be an order-of-magnitude estimate based upon comparison with an internal standard. GC-MS results, the total amount of Total Toxic Organics (TTO) detected in the discharge is to be reported in the units of micrograms per liter (ug/l). Total Toxic Organics (TTO) is defined as the accumulation of organic pollutants below that are detected in the discharge at a level greater than 10 ug/l.

PART II. OTHER REQUIREMENTS

E. Continued

Acenaphthene	Naphthalene
Acrolein	Nitrobenzene
Acrylonitrile	2-nitrophenol
Benzene	4-nitrophenol
Benzidine	2,4-dinitrophenol
Carbon tetrachloride(tetrachloromethane)	4,6-dinitro-o-cresol
Chlorobenzene	N-nitrosodimethylamine
1,2,4-trichlorobenzene	N-nitrosodiphenylamine
Hexachlorobenzene	Phenanthrene
1,2-dichloroethane	1,2,5,6-dibenzanthracene
1,1,1-trichloroethane	(dibenzo(a,h) anthracene
Hexachloroethane	2,3-o-phenylene pyrene
1,1-dichloroethane	(Indeno (1,2,3-cd) pyrene)
1,1,2-trichloroethane	Pyrene
1,1,2,2-tetrachloroethane	Tetrachloroethylene
Chloroethane	Toluene
Bis (2-chlorethyl) ether	Trichloroethylene
2-chloroethyl vinyl ether (mixed)	Vinyl Chloride(chloroethylene)
N-nitrosodi-n-propylamine	Aldrin
Pentachlorophenol	Dieldrin
Phenol	Chlordane (technical mixture and metabolites)
Bis (2-ethylhexyl) phthalate	4,4-DDT
Butyl benzyl phthalate	4,4-DDE (p,p-DDX)
Di-n-butyl phthalate	4,4-DDD (p,p-TDE)
Di-n-octyl phthalate	Alpha-endosulfan
Diethyl phthalate	Beta-endosulfan
Dimethyl phthalate	Endosulfan sulfate
1,2-benzanthracene (benzo(a)anthracene)	Endrin
(Benzo(a)pyrene)	Endrin aldehyde
3,4-benzopyrene	Heptachlor
3,4-Benzofluoranthene (benzo(b) fluoranthene)	Heptachlor epoxide
11,12-benzofluoranthene (benzo(k)fluoranthene)	(BHC-hexachlorocyclohexane)
Chrysene	Alpha-BHC
Acenaphthylene	Beta-BHC
Anthracene	Gamma-BHC
	Delta-BHC

After review of the results of the organic pollutant monitoring program, the Ohio EPA may propose effluent limitations for specific organic pollutants, or continue or modify the monitoring program as appropriate.

- F. The Ohio EPA may propose to modify this permit to include a Best Management Practices (BMP) program requirement. A BMP would require the permittee to submit a toxic organic pollutant management plan to the Ohio EPA.
- G. The permittee shall utilize method 1109.1 "E. Coli in water by the membrane filter procedure" contained in the document EPA 600/4-85/076 until U.S. EPA promulates a method for analyzing E. Coli under 40 CFR 136, at which time the permittee shall us the method promulgated by U.S. EPA.

PART III - GENERAL CONDITIONS

1. DEFINITIONS

"daily load limitations" is the total discharge by weight during any calendar day. If only one sample is taken during a day, the weight of pollutant discharge calculated from it is the daily load.

"daily concentration limitation" means the arithmetic average (weighted by flow) of all the determinations of concentration made during the day. If only one sample is taken during the day its concentration is the daily concentration. Coliform bacteria limitations compliance shall be determined using the geometric mean.

"7-day load limitation" is the total discharge by weight during any 7-day period divided by the number of days in that 7-day period that the facility was in operation. If only one sample is taken in a 7-day period the weight of pollutant discharge calculated from it is the 7-day load. If more than one sample is taken during the 7-day period the 7-day load is calculated by determining the daily load for each day sampled, totaling the daily loads for the 7-day period and dividing by the number of days sampled.

"7-day concentration limitation" means the arithmetic average (weighted by flow) of all the determinations of daily concentration limitation made during the 7-day period. If only one sample is taken during the 7-day period, its concentration is the 7-day concentration limitation for that 7-day period. Coliform bacteria limitations compliance shall be determined using the geometric mean.

"30-day load limitation" is the total discharge by weight during any 30-day period divided by the number of days in the 30-day period that the facility was in operation. If only one sample is taken in a 30-day period the weight of pollutant discharge calculated from it is the 30-day load. If more than one sample is taken during one 30-day period the 30-day load is calculated by determining the daily load for each day sampled, totaling the daily loads for the 30-day period and dividing by the number of days sampled.

"30-day concentration limitation" means the arithmetic average (weighted by flow) of all the determinations of daily concentration made during the 30-day period. If only one sample is taken during the 30-day period, its concentration is the 30-day concentration for that 30-day period. Coliform bacteria limitations compliance shall be determined using the geometric mean.

"85 percent removal limitations" means the arithmetic mean of the values for effluent samples collected in a period of 30 consecutive days shall not exceed 15 percent of the arithmetic mean of the values for influent samples collected at approximately the same times during the same period.

Absolute Limitations. Compliance with limitations having descriptions of "shall not be less than", "nor greater than", "shall not exceed", "minimum", or "maximum", shall be determined from any single value for effluent samples and/or measurements collected.

"Net concentration" shall mean the difference between the concentration of a given substance in a sample taken of the discharge and the concentration of the same substances in a sample taken at the intake which supplies water to the given process. For the purpose of this definition samples that are taken to determine the net concentration shall always be 24-hour composite samples made up of at least six increments taken at regular intervals throughout the plant day.

"Net load" shall mean the difference between the load of a given substance as calculated from a sample taken of the discharge and the load of the same substance in a sample taken at the intake which supplies water to given process. For purposes of this definition samples that are taken to determine the net loading shall always be 24-hour composite samples made up of at least six increments taken at regular intervals throughout the plant day.

"mgd" means million gallons per day

"mg/l" means milligrams per liter

"ug/l" means micrograms per liter

"Reporting Code" is a five digit number used by the Ohio EPA in processing reported data. The reporting code does not imply the type of analysis used nor the sampling techniques employed.

Quarterly sampling frequency means the sampling shall be done in the months of March, June, August and December.

Yearly sampling frequency means the sampling shall be done in the month of September.

Semi-annual sampling frequency means the sampling shall be done during the months of June and December.

Winter shall be considered to be the period from November 1 thru April 30.

"Bypass" means the intentional diversion of waste streams from any portion of the treatment facility.

Summer shall be considered to be the period from May 1 thru October 31.

"Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

2. GENERAL EFFLUENT LIMITATIONS

The effluent shall, at all times, be free of substances:

- A. In amounts that will settle to form putrescent, or otherwise objectionable, sludge deposits; or that will adversely affect aquatic life or water fowl;
- B. Of an oily, greasy, or surface-active nature, and of other floating debris, in amounts that will form noticeable accumulations of scum, foam or sheen;
- C. In amounts that will alter the natural color or odor of the receiving water to such degree as to create a nuisance;
- D. In amounts that either singly or in combination with other substances are toxic to human, animal, or aquatic life;
- E. In amounts that are conducive to the growth of aquatic weeds or algae to the extent that such growths become inimical to more desirable forms of aquatic life, or create conditions that are unsightly, or constitute a nuisance in any other fashion;
- F. In amounts that will impair designated instream or downstream water uses.

3. FACILITY OPERATION AND QUALITY CONTROL

All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.
- B. The permittee shall effectively monitor the operation and efficiency of treatment and control facilities and the quantity and quality of the treated discharge.
- C. Maintenance of wastewater treatment works that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the Ohio EPA as specified in the Paragraph in this PART III entitled, "UNAUTHORIZED DISCHARGES".

4. REPORTING

- A. Monitoring data required by this permit shall be reported on the Ohio EPA report form (4500) on a monthly basis. Individual reports for each sampling station for each month are to be received no later than the 15th day of the next month. The original plus first copy of the report form must be signed and mailed to:

Ohio Environmental Protection Agency
Div Water Pollution Control
Enforcement Section, ES/MOR
PO Box 1049
Columbus, Ohio 43266-0149

- B. If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified below, the results of such monitoring shall be included in the calculation and reporting of the values required in the reports specified above.
- C. Analyses of pollutants not required by this permit, except as noted in the preceding paragraph, shall not be reported on Ohio EPA report form (4500) but records shall be retained as specified

5. SAMPLING AND ANALYTICAL METHODS

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored flow. Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements.

6. RECORDING OF RESULTS

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- A. The exact place and date of sampling; (time of sampling not required on EPA 4500)
- B. The person(s) who performed the sampling or measurements;
- C. The date the analyses were performed on those samples;
- D. The person(s) who performed the analyses;
- E. The analytical techniques or methods used; and
- F. The results of all analyses and measurements

7. RECORDS RETENTION

The permittee shall retain all of the following records for the wastewater treatment works for a minimum of three years, including:

- A. All sampling and analytical records (including internal sampling data not reported);
- B. All original recordings for any continuous monitoring instrumentation;
- C. All instrumentation, calibration and maintenance records; and
- D. All plant operation and maintenance records.
- E. All reports required by this permit.
- F. Records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or application.

These periods will be extended during the course of any unresolved litigation, or when so requested by the Regional Administrator or the Ohio EPA. The three year period for retention of records shall start from the date of sample, measurement, report or application.

8. AVAILABILITY OF REPORTS

Except for data determined by the Ohio EPA to be entitled confidential status, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate District Offices of the Ohio EPA. Both the Clean Water Act and Section 6111.05 Ohio Revised Code state that effluent data and receiving water quality data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in the Ohio Revised Code Section 6111.09.

9. DUTY TO PROVIDE INFORMATION

The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

10. RIGHT OF ENTRY

The permittee shall allow the Director, or an authorized representative upon presentation of credentials and other documents as may be required by law to:

- A. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
- C. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.

D. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

11. UNAUTHORIZED DISCHARGES

- A. Bypassing or diverting of wastewater from the treatment works is prohibited unless:
1. Bypass was unavoidable to prevent loss of life, personal injury or severe property damage;
 2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of downtime. This condition is not satisfied if adequate back up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 3. The permittee submitted notices as required under paragraph C. of this section.
- B. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.
- C. The Director may approve an unanticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed in paragraph 11. A. of this section.
- D. The permittee shall submit notice of an unanticipated bypass as required in section 12 (one hour notice).
- E. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded if that bypass is for essential maintenance to assure efficient operation.

12. NONCOMPLIANCE NOTIFICATION

- A. The permittee shall by telephone report any of the following within one hour of discovery, at (toll free) 1-800-282-9378:
1. Any noncompliance which may endanger health or the environment;
 2. Any unanticipated bypass which exceeds any effluent limitation in the permit; or
 3. Any upset which exceeds any effluent limitation in the permit.
- B. The permittee shall by telephone report any violation of a maximum daily discharge limitation for any of the pollutants listed by the Director in the permit within 24 hours of discovery at (toll free) 1-800-282-9378.
- C. For the telephone reports required by Parts 12.A and 12.B, the following information must be included:
1. The times at which the discharge occurred, and was discovered;
 2. The approximate amount and the characteristics of the discharge;
 3. The stream(s) affected by the discharge;
 4. The circumstances which created the discharge;
 5. The names and telephone numbers of the persons who have knowledge of these circumstances;
 6. What remedial steps are being taken; and
 7. The names and telephone numbers of the persons responsible for such remedial steps.
- D. These telephone reports shall be confirmed in writing within five days of the discharge and submitted to the appropriate Ohio EPA District office. The report shall include the following:
1. The limitation(s) which has been exceeded;
 2. The extent of the exceedance(s);
 3. The cause of the exceedance(s);
 4. The period of the exceedance(s) including exact dates and times;
 5. If uncorrected, the anticipated time the exceedance(s) is expected to continue, and
 6. Steps being taken to reduce, eliminate and/or prevent recurrence of the exceedance(s).

E. Compliance Schedule Events:

If the permittee is unable to meet any date for achieving an event, as specified in the Schedule of Compliance, the permittee shall submit a written report to the appropriate District Office of the Ohio EPA within 14 days of becoming aware of such situation. The report shall include the following:

1. The compliance event which has been or will be violated;
 2. The cause of the violation;
 3. The remedial action being taken;
 4. The probable date by which compliance will occur; and
 5. The probability of complying with subsequent and final events as scheduled.
- F. The permittee shall report all instances of noncompliance not reported under Paragraphs A, C, or D of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in Paragraph C of this section.
- G. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

13. RESERVED**14. DUTY TO MITIGATE**

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

15. AUTHORIZED DISCHARGES

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than, or at a level in excess of, that authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such violations may result in the imposition of civil and/or criminal penalties as provided for in Section 309 of the Act, and Ohio Revised Code Sections 6111.09 and 6111.99.

16. DISCHARGE CHANGES

The following changes must be reported to the appropriate Ohio EPA District Office as soon as practicable.

- A. For all treatment works, any significant change in character of the discharge which the permittee knows or has reason to believe has occurred or will occur which would constitute cause for modification or revocation and reissuance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Notification of permit changes or anticipated noncompliance does not stay any permit condition.
- B. For publicly owned treatment works:
 1. Any proposed plant modification, addition and/or expansion that will change the capacity or efficiency of the plant;
 2. The addition of any new significant industrial discharge; and
 3. Changes in the quantity or quality of the wastes from existing tributary industrial discharges which will result in significant new or increased discharges of pollutants.
- C. For non-publicly owned treatment works, any proposed facility expansions, production increases, or process modifications, which will result in new, different, or increased discharges of pollutants.

Following this notice, modifications to the permit may be made to reflect any necessary changes in permit conditions, including any necessary effluent limitations for any pollutants not identified and limited herein. A determination will also be made as to whether a National Environmental Policy Act (NEPA) review will be required. Sections 6111.44 and 6111.45, Ohio Revised Code, require that plans for treatment works or improvements to such works be approved by the Director of the Ohio EPA prior to initiation of construction.

- D. In addition to the reporting requirements under 40 CFR 122.41(f) and per 40 CFR 122.42(a), all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" specified in 40 CFR Sections 122.42(a)(1)(i) through 122.42(a)(1)(iv).
2. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" specified in 122.42(a)(2)(i) through 122.42(a)(2)(iv).

17. TOXIC POLLUTANTS

The permittee shall comply with effluent standards or prohibitions established under Section 307 (a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement. Following establishment of such standards or prohibitions, the Director shall modify this permit and so notify the permittee.

18. PERMIT MODIFICATION OR REVOCATION

- A. After notice and opportunity for a hearing, this permit may be modified or revoked, by the Ohio EPA, in whole or in part during its term for cause including, but not limited to, the following:
 1. violation of any terms or conditions of this permit;
 2. obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
 3. a change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.
- B. Pursuant to rule 3745-33-06, Ohio Administrative Code the permittee may at any time apply to the Ohio EPA for modification of any part of this permit. The filing of a request by the permittee for a permit modification or revocation does not stay any permit condition. The application for modification should be received by the appropriate Ohio EPA District Office at least ninety days before the date on which it is desired that the modification become effective. The application shall be made only on forms approved by the Ohio EPA.

19. TRANSFER OF OWNERSHIP OR CONTROL

This permit cannot be transferred or assigned nor shall a new owner or successor be authorized to discharge from this facility, until the following requirements are met:

- A. The permittee shall notify the succeeding owner or successor of the existence of this permit by a letter, a copy of which shall be forwarded to the appropriate Ohio EPA District Office. The copy of that letter will serve as the permittee's notice to the Director of the proposed transfer. The copy of that letter shall be received by the appropriate Ohio EPA District Office sixty days prior to the proposed date of transfer;
- B. A written agreement containing a specific date for transfer of permit responsibility and coverage between the current and new permittees (including acknowledgement that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on) shall be submitted to the appropriate Ohio EPA District Office within sixty days after receipt by the District Office of the copy of the letter from the permittee to the succeeding owner;
- C. The Director does not exercise his right within thirty days after receipt of the written agreement to notify the current permittee and the new permittee of his or her intent to modify or revoke the permit and to require that a new application be filed; and
- D. The new owner or successor receives written confirmation and approval of the transfer from the Director of the Ohio EPA.

At anytime during the sixty (60) day period between notification of the proposed transfer and the effective date of the transfer, the Director may prevent the transfer if he concludes that such transfer will jeopardize compliance with the terms and conditions of the permit.

20. OIL AND HAZARDOUS SUBSTANCE LIABILITY

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

21. SOLIDS DISPOSAL

Collected screenings, sludges, sludges and other solids shall be disposed of in such a manner as to prevent entry of these wastes into waters of the State. For publicly owned treatment works these shall be disposed of in accordance with the approved CEPA Sludge Management Plan.

22. CONSTRUCTION AFFECTING NAVIGABLE WATERS

This permit does not authorize or approve the construction of any onshore or offshore physical structures or facilities or the undertaking of any work in any navigable waters.

23. CIVIL AND CRIMINAL LIABILITY

Except as exempted in the permit conditions on UNAUTHORIZED DISCHARGES or UPSETS, nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

24. STATE LAWS AND REGULATIONS

Nothing in this permit shall be construed to preclude the institution of any legal action nor relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Act.

25. PROPERTY RIGHTS

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, state, or local laws or regulations.

26. UPSET

The provisions of 40 CFR Section 122.41(n), relating to 'Upset,' are specifically incorporated herein by reference in their entirety. For definition of 'upset', see Part 1.

27. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

28. SIGNATORY REQUIREMENTS

All applications submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22(b) and (c).

All reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR Section 122.22(b) and (c).

29. OTHER INFORMATION

- A. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.
- B. ORC 6111.99 provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than \$25,000 per violation.
- C. ORC 6111.99, states that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than \$25,000 per violation.
- D. ORC 6111.99 provides that any person who violates Sections 6111.04, 6111.042, 6111.05, or division (A) of Section 6111.07 of the Revised Code shall be fined not more than twenty-five thousand dollars or imprisoned not more than one year, or both.

30. NEED TO HALT OR REDUCE ACTIVITY

40 CFR 122.61(c), states that it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with conditions of this permit.

31. APPLICABLE FEDERAL RULES

All references to 40 CFR in this permit mean the version of 40 CFR which is effective as of the effective date of this permit.



ROY F. WESTON, INC.
6501 AMERICA'S PARKWAY, N.E.
SUITE 800
ALBUQUERQUE, NEW MEXICO 87110
505-884-5050
FAX: 505-884-5388

Handwritten notes:
I...
PERK...
ACTION...
dl
2/25

18 February 1992

University of California
Los Alamos National Laboratory
Attention: Dr. Kenneth Rea
EES-14, ER TSO
P.O. Box 1663, MS K-485
Los Alamos, NM 87545

RE: ER Program, Mound Plant
Operable Unit 9, Site Scoping Report
Change Order Request 18-001

RFW WO# 2744-41-18

Dear Dr. Rea:

Attached is the change order request for the Operable Unit 9, Site Scoping Report. This change order is required to complete Volumes 2, 10 and 11, as discussed below.

Volume 2 - Geologic Log and Well Information Report includes a revision in response to regulatory agency comments and publication of the Final document. An addendum is also required that will include lithologic and stratigraphic data compiled from Mound Plant engineering records. The revised document is due to EPA 17 April 1992.

Volume 10 - Permits and Enforcement Actions requires revision in response to regulatory agency comments. Response to comments and the revised document are due to EPA 21 March 1992.

Volume 11 - Spills and Response Actions requires response to regulatory agency comments. The response to comments is due to EPA 17 April 1992.

One trip to Miamisburg, Ohio is included to confer with Mound personnel and complete the data-gathering efforts for these reports.

Approval pages will be included with the final copies of Volumes 2, 10 and 11 submitted to EPA on the dates cited above. Four new copies of each of these volumes will be produced with the signed approval pages and submitted to R.A. Neff, EG&G-MAT, for inclusion in the administrative record. Twenty-five copies of the approval pages and Final cover and title sheets will also be reproduced and distributed for insertion into existing documents.

Additional labor and expense charges are included in this change order request for reproduction of the large volume of reference materials used in compilation of Volume 7 - Waste Management Report. Since much of the data compiled for this report was not available through outside sources, the project managers agreed at the December FFA Meeting that one copy of the set of references for each of the agencies will be sufficient. This involves about 40 hours labor at the production technician level. Five copies of these references will be produced and distributed, two copies to EG&G-MAT and one copy each to EPA and OEPA. One copy will be retained in the WESTON project office in Cincinnati, Ohio.

Handwritten numbers:
29-01-01-07-10
94 06160007



Dr. Kenneth Rea

-2-

18 February 1992

The change order request is in the amount of \$33,295 for 417 hours. The new ceiling of this task is \$88,796.

If you have any questions, please contact Bill Criswell or John Price.

Sincerely,

ROY F. WESTON, INC.

A handwritten signature in cursive script that reads "William M. Little".

Michael P. Mauzy, P.E.
ER Program, TSO Subcontractor
Project Manager

CWC/shm

Attachment

pc w/o att: Dick Neff (EG&G)
pc w/att: T. Farmer (ER TSO)
ER TSO File

scopcor2.001



ROY F. WESTON, INC.
6501 AMERICA'S PARKWAY, N.E.
SUITE 800
ALBUQUERQUE, NEW MEXICO 87110
505-884-5050
FAX: 505-884-5388

f 04-9

December 13, 1991

University of California
Los Alamos National Laboratory
Attention: Dr. Kenneth Rea
EES-14, ER TSO
P.O. Box 1663, MS K-485
Los Alamos, NM 87545

RE: ER Program, Mound Plant
Site Scoping Report: Volume 10, - Permits and Enforcement Actions
RFW WO # 2744-41-18

Dear Dr. Rea:

Enclosed are copies of the Site Scoping Report: Volume 10 - Permits and Enforcement Actions. This report is being distributed to U.S. EPA, Ohio EPA, and other project managers pursuant to directions from Art Kleinrath, DOE-Dayton Area Office. The submission of this report is in accordance with the current FFA schedule.

If you have any questions, please contact Bill Criswell or John Price.

Sincerely,

ROY F. WESTON, INC.

Michael P. Mauzy, P.E.
ER Program, TSO Subcontractor
Project Manager

CWC/shm
Enclosures

pc w/encl: A. Kleinrath (DOE-DAO)
T. Farmer (ER TSO)
D. Neff (EG&G-MAT)
K. Koehler (EG&G-MAT)
M. Williams (EG&G-MAT)
D. Mally (US EPA)
M. Hatcher (OEPA)
J. Sands (DOE-HQ)
D. Flynn (DOE AL)

4

pc w/o encl: ER TSO File

scopltr5.wp



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

KGK
p-0-4-9

JAN 16 1991

REPLY TO THE ATTENTION OF:

HSRM-6J

VIA FACSIMILE AND
FIRST CLASS MAIL

Mr. Arthur Kleinrath
U.S. Department of Energy
Dayton Area Office
P.O. Box 66
Miamisburg, Ohio 45343

RE: U.S. DOE Mound Plant Review Comments
Site Scoping Report, Volume 10

Dear Mr. Kleinrath:

Enclosed are the United States Environmental Protection Agency's (U.S. EPA's) comments on the "Site Scoping Report, Volume 10 - Permits and Enforcement Actions" for the Mound Plant site. Please provide revised pages and responses to these comments within forty-five days of your receipt of this letter, or by March 1, 1992.

Please feel free to call me at (312) 353-6287 if you have any questions.

Sincerely,

Diana Mally
Remedial Project Manager

Enclosure

cc: M. Hatcher, OEPA
~~D. Neff, EG&G Mound~~
T. Farmer, LANL ER-TSO
J. Price, Weston

US DOE MOUND
RI/FS
Operable Unit 9, Site Scoping Report
Volume 10 - Permits & Enforcement Actions
December 1991
US EPA

General Comments

1. Section 2
Include discussions in the text about the registrations listed in Table II.2.
2. Section 3
Include information in the text and table about the FIFRA 1990 inspection and Notice of Warning letter discussed in the 1990 Mound Environmental Monitoring Report.

Specific Comments

1. Section 1.1
Page 1-2, paragraph 3
Please include the conditions of the permits in this report. Since Mound currently only has 1 NPDES permit and five air emissions permits, discussing/listing the limitations of these permits should not be beyond the scope of this report at this time.
2. Section 2
Page 2-1, paragraph 1
Fourth sentence is awkward ("...operated maintained permits...").
3. Section 2
Page 2-1, paragraph 1
Please add some discussion to the text as to why applications received registration status and were not officially permitted.
3. Section 2
Page 2-1, paragraph 2
Please clarify the number of air permits held. The 1990 Mound Environmental Monitoring Report discusses 5 state air permits from OEPA and authorization from RAPCA for open burning of explosive waste and for conducting fire training exercises on site. Is the RAPCA authorization in the form of a permit and one of the five currently held? Are both vapor degreasers under the same or separate permits? I cannot identify the five active permits on Table II.1.
4. Section 2
Page 2-1, paragraph 2
Please provide clarification in the text why the power plant boiler registrations were canceled and remain in inactive status.

5. Section 2

Page 2-1, paragraph 3

Fifth sentence is awkward.

6. Table III. 1

Page 3-5

Please include missing dates.

7. Table III.1

Pages 3-5 and 3-6

Please explain why dates are to be determined. Does this mean the records are incomplete and this information is missing?

F-049



6501 AMERICAS PARKWAY, N.E.
ALBUQUERQUE, NM 87110-1517
505-884-5050 • FAX: 505-884-5388

23 March 1993

EG&G Mound Applied Technologies
Attention: Kathy Koehler
Mail Stop OSE-2
P.O. Box 3000
Miamisburg, Ohio 45343-3000

RE: BOA No. 24251
Operable Unit 9, Site Scoping Report

RFW WO# 5376-39-02

Dear Ms. Koehler:

At your request, we are sending to CH2M Hill, under separate cover, one copy each of the following Site Scoping Reports:

Volume 2 - Geologic Log and Well Information and Addendum - Stratigraphic and Lithologic Logs

Volume 7 - Waste Management

Volume 10 - Permits and Enforcement Actions

Volume 11 - Spills and Response Actions

Per instructions from Diana Mally, these volumes are being sent to:

CH2M Hill
Attention: Eldon Fink
310 West Wisconsin Ave.
Suite 700
Milwaukee, Wisconsin 53201-2090

If you have any questions regarding this matter, please do not hesitate to call Bill Criswell (505) 884-5050 or the Alternate Project Manager, John Price, at (513) 825-3440.

Sincerely,

ROY F. WESTON, INC.

John W. Thorsen, P.E.
Project Manager

CWC/gy

29-01-01-07-10
9406160007



pc w/attachment: E. Fink (CH2M Hill)

w/o attachment: C. Friedman (EG&G MAT)
M. Williams (EG&G MAT)
A. Kleinrath (DOE DAO)
D. Mally (EPA)
D. Spencer (EPA)
ER Project File (ABQ)
ER Project File (CIN)