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Remediation Services, L.L.C.  
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DATE: October 20, 1997  
TO: Norman P. Cypher, 374 Building Manager, Bldg. 374, X5782  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 374 -  
GRK-297-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:

RMRS Records Management



DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

ADMIN RECCRD

CEX-072-99

IA-A-000809

1/140

**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 374 WATER MANAGEMENT AND TREATMENT (RMRS/SSOC)**

**INTRODUCTION**

Based on a summary of Building 374 Water Management and Treatment (WM&T) activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 374. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 374. At that time, the Air Compliance Guideline Document will be updated.

**BUILDING 374 WATER MANAGEMENT AND TREATMENT**

**Saltcrete Process (6 requirements)**

**Requirement 1: Visible emissions from vent #3 shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE542

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). WM&T personnel are responsible for working with AQM to schedule annual opacity observation.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Processing of salt shall not exceed 354.25 tons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Approximately 347.2 tons per year of salt are accounted for in the saltcrete (98% of total entering baghouse). The remaining 2% of the salt, or 7.08 tons per year, represents the uncontrolled particulate

emissions prior to flowing through the HEPA filters. *Therefore the actual limited amount of salt in the saltcrete is 347.2 tons per year (salt in saltcrete plus uncontrolled emissions from baghouse equal permitted limit).*

Driver: Condition number 4 in permit number 93JE542

Action: WM&T personnel must record the amount of salt processed.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3:** At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Driver: Condition number 5 in permit number 93JE542

Action: WM&T personnel must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: WM&T personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: The permit must be retained and made available for inspection upon request**

Driver: General Terms and Conditions number 4 in permit number 93JE542

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 5: Track natural gas consumption for spray dryer.**

Driver: Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a

Action: Building 371 Utilities personnel must maintain records that track the annual consumption of natural gas by the spray dryer.

Frequency: Annual review of records

Record Format: Existing consumption log (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 371 Utilities personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Track cement consumption for saltcrete process.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual consumption of cement used in the saltcrete process.

Frequency: Annual review of records

Record Format: Existing consumption log (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Waste Receiving and Neutralization (4 requirements)**

**Requirement 1: Track the annual volume of pipeline and non-pipeline acidic waste received.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual volume of pipeline and non-pipeline acidic waste received.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual evaporator throughput (feed rate in gallons per year).**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual evaporator throughput (feed rate in gallons per year).

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: Track the annual volume of nitric acid neutralized during the neutralization process.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual volume of nitric acid neutralized during the neutralization process.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Track radioactive concentrations of aqueous waste streams received by WM&T.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.1. i (b), CAQCC Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

Action: WM&T personnel must maintain records that track radioactive concentrations of the aqueous waste streams received in Building 374 (WM&T personnel must ensure that maximum criticality limits are not exceeded).

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Evaporation Process (1 requirement)**

**Requirement 1: Track the annual volume of nitric and phosphoric acid used during the descaling process.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual volume of nitric and phosphoric acid used during the descaling process.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Radioactive Decontamination Process (2 requirements)**

**Requirement 1: Track the annual volume of waste stream treated (segregated by building).**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual volume of waste stream treated (segregated by building).

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual amount of dry chemicals used in the process (magnesium sulfate, calcium chloride, ferric sulfate, etc.).**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual amount of dry chemicals used in the process (magnesium sulfate, calcium chloride, ferric sulfate, etc.).

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Sludge Solidification Process (3 requirements)**

**Requirement 1: Track the annual volume of sludge produced during the process.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual volume of sludge produced during the process.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual amount of absorbent used in the process.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual amount of absorbent used in the process.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: Track the annual volume of nitric acid used during chemical preparation (dilution process).**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual volume of nitric acid used during chemical preparation (dilution process).

Frequency: Annual review of records

Record Format: Existing recordkeeping system (existing method of recordkeeping is acceptable to fulfill this requirement)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Chemical Usage (1 requirement)**

**Requirement 1: Track the annual chemical/solvent usage.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: WM&T personnel must maintain records that track the annual chemical/solvent usage by WM&T personnel.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: WM&T personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 374 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Building 371 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 374 maintenance activities, and architectural and maintenance painting activities.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 371 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a stationary diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature  
Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Radionuclide Regulatory Compliance (6 requirements)**

**Requirement 1: The differential pressure drop ( $\Delta p$ ) across High Efficiency Particulate Air (HEPA) filters must be checked and recorded per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs) (CDPHE requests a copy of records during annual inspection)

Action: Building 371 personnel must monitor  $\Delta p$  across HEPA filter stages and record results, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing limiting conditions for operation (LCO) tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 371 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: The efficiency of Building HEPA filters must be tested and recorded, per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: Building 371 personnel must ensure HEPA filter efficiency is tested, and testing records are maintained, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing LCO tracking form or an appropriate alternative

Signature Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 371 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: A HEPA filter must be replaced when it fails to meet the efficiency recommended in the appropriate building safety analysis document, and/or the  $\Delta p$  across the filter exceeds the threshold recommended in the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: When  $\Delta p$  across a building HEPA filter exceeds the threshold recommended in the appropriate building safety analysis document, or a building HEPA filter does not meet the efficiency recommended in the appropriate building safety analysis document, building personnel must ensure that the affected HEPA filter is replaced, and a record documenting the replacement is completed.

Frequency: As required

Record Format: Existing HEPA filter records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 371 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Records must be maintained and AQM must be notified of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.**

Driver: CAQCC Regulation No. 8A: Subpart A (40 CFR 61 Subpart A) General Provisions, Section 61.14

Action: Building 371 personnel must maintain records and notify AQM of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.

Frequency: As required

Record Format: Existing logbook

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: Building 371 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 5: Radionuclide emission measurements must be made at all significant release points which have a potential to discharge radionuclides into the air in quantities which could cause an effective dose equivalent (EDE) in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Significant Radionuclide Release Points in Building 374:

374-MAI

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must ensure that radionuclide emission measurements are made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR Part 61, Subpart H.

Frequency: Continuous

Record Format: Existing monitoring record format

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: AQM must maintain monitoring records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Ensure that radionuclide emission measurements are being made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must work with building personnel to confirm that each point source location that exceeds a potential EDE of 1% of the 10 millirem Site standard is being monitored in accordance with CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs.

Frequency: Quarterly

Record Format: AQM Rad NESHAPs compliance form (currently being developed)

Signature Requirement: Responsible building representative

Record Transmittal: N/A

Record Retention: AQM must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit - Building 374  
 Salt Production and Cement Usage**

The amount of salt produced and the amount of cement used is to be recorded and reported at the beginning of each month, please print clearly. The total amount of salt produced shall not exceed the permitted limit of 347.1 tons (694,200 pounds) per twelve month period.

Total Amount of Salt Produced During the month of _____ (pounds)	Total Amount of Cement Used to Solidify Saltcrete for the month of _____ (pounds)	Total Amount of Salt Produced During the Last Twelve Month Period (rolling total) (pounds)	Total Amount of Cement Used to Solidify Saltcrete for the Last Twelve Month Period (rolling total) (pounds)

I certify that all information provided is accurate and complete to the best of my knowledge:

Print Name/Signature (Preparer)	Bldg.	Cubicle	Extension
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I certify that I have reviewed all information provided and it is accurate and complete to the best of my knowledge:

Print Name/Signature (Supervision Signature Required)	Bldg.	Cubicle	Extension
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Carrie J. Wesley Record Custodian (Print Name)	Bldg. 374 Location of Record
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**Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of the first week of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.**



DATE: October 20, 1997

TO: John M. Bower, 440 Building Manager, Bldg. 440, X3560

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 440 -  
GRK-298-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

18

**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 440 (RMRS)**

**INTRODUCTION**

Based on a summary of Building 440 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 440. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 440. At that time, this Air Compliance Guideline Document will be updated.

**Waste Repack, Sampling, and Characterization (1 requirement)**

**Requirement 1:** For each waste repack, sampling, and/or characterization area, track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and material concentrations of chemicals and radionuclides.

**Driver:** Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

**Action:** For each waste repack, sampling, and/or characterization area, each responsible company must maintain records that track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and material concentrations of chemicals and radionuclides.

**Frequency:** Annual review of records

**Record Format:** Existing process tracking log or records

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual Colorado Department of Public Health and Environment (CDPHE) inspection.

**Record Retention:** Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment:** All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids):** All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODCs)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

**Record Format:** Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Signature Requirement:** Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Transmittal:** Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Retention:** Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1:** Track annual usage of coatings, solvents, and other chemicals associated with Building 440 maintenance activities, and architectural and maintenance painting activities.

**Driver:** CAQCC Regulation No. 3, Part A, Section II.D.4.a

**Action:** Appropriate personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 440 maintenance activities, and architectural and maintenance painting activities.

**Frequency:** Annual review of records

**Record Format:** Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

**Record Retention:** Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each stationary diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Radionuclide Regulatory Compliance (6 requirements)**

The following six requirements will apply to the High Efficiency Particulate Air (HEPA) filtration system for the repack facility once installation is completed.

**Requirement 1: The differential pressure drop ( $\Delta p$ ) across HEPA filters must be checked and recorded per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs) (CDPHE requests a copy of records during annual inspection)

Action: Building 440 personnel must monitor  $\Delta p$  across HEPA filter stages and record results, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing limiting conditions for operation (LCO) tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 440 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: The efficiency of Building HEPA filters must be tested and recorded, per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: Building 440 personnel must ensure HEPA filter efficiency is tested and testing records are maintained, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing LCO tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 440 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: A HEPA filter must be replaced when it fails to meet the efficiency recommended in the appropriate building safety analysis document, and/or the  $\Delta p$  across the filter exceeds the threshold recommended in the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE may request a copy of records during annual inspection)

Action: When  $\Delta p$  across a building HEPA filter exceeds the threshold recommended in the appropriate building safety analysis document, or a building HEPA filter does not meet the efficiency recommended in the appropriate building safety analysis document, building personnel must ensure that the affected HEPA filter is replaced, and a record documenting the replacement is completed.

Frequency: As required

Record Format: Existing HEPA filter records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 440 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Records must be maintained and AQM must be notified of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.**

Driver: CAQCC Regulation No. 8A: Subpart A (40 CFR 61 Subpart A) General Provisions, Section 61.14

Action: Building 440 personnel must maintain records and notify AQM of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.

Frequency: As required

Record Format: Existing logbook

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: Building 440 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 5: Periodic confirmatory radionuclide emission measurements must be made at all release points which have a potential to discharge radionuclides into the air.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must ensure that periodic confirmatory radionuclide emission measurements are made at all release points which have a potential to discharge radionuclides into the air.

Frequency: Continuous

Record Format: Existing monitoring record format

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: AQM must maintain monitoring records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Ensure that radionuclide emission measurements are being made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an Effective Dose Equivalent (EDE) in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must work with building personnel to confirm that each point source location that exceeds a potential EDE of 1% of the 10 millirem Site standard is being monitored in accordance with CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs.

Frequency: Quarterly

Record Format: AQM Rad NESHAPS compliance form (currently being developed)

Signature Requirement: Responsible building representative

Record Transmittal: N/A

Record Retention: AQM must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.



DATE: October 20, 1997

TO: Paul E. Dewitt, 444/447 Building Manager, Bldg. T439A, X3443

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *GK*

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 444/447 -  
GRK-299-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:

RMRS Records Management

**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 444/447 (RMRS)**

**INTRODUCTION**

Based on a summary of Building 444/447 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 444/447. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 444/447. At that time, this Air Compliance Guideline Document will be updated.

**Permitted Diesel Fuel Fired Equipment (4 requirements)**

The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:

- a) Building 427, Emergency Generator, Caterpillar 3412, Serial No. 81Z01961

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). The operator must work with Air Quality Management (AQM) to schedule annual opacity observations.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature  
Requirement: N/A

Record  
Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record  
Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record hours of operation by each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: Operator of the unit must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.**

Driver: Condition number 5 in permit number 93JE1349

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent 20% opacity.**

Driver: Colorado Air Quality Control Commission (CAQCC) Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 444/447 maintenance activities, and architectural and maintenance painting activities.**

**Driver:** CAQCC Regulation No. 3 Part A, Section II.D.4.a

**Action:** Building 444/447 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 444/447 maintenance activities, and architectural and maintenance painting activities.

**Frequency:** Annual review of records

**Record Format:** Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

**Record Retention:** Building 444/447 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

**Driver:** CAQCC Regulation No. 7, Section III.A

**Action:** Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Registered ODC-using equipment in Building 444/447:**

- 1) AQD #444-018
- 2) AQD #444-019

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

**Driver:** CAQCC Regulation No. 15, and 40 CFR Part 82

**Action:** Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Frequency:** Ongoing

**Record Format:** Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Signature Requirement:** Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Transmittal:** Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Retention:** Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
427	N/A	4274780					
827	28	8651905					
881G	29 (1400 kW unit)	39077					
881G	30 (400 kW unit)	8810014					
989	N/A	9910135					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

Jeff Bowick      Bldg. 881  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.

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DATE: October 20, 1997  
TO: John M. Bower, 664 Building Manager, Bldg. 440, X3560  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 664 - GRK-300-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 664 OPERATIONS MANAGEMENT (RMRS)**

**INTRODUCTION**

Based on a summary of Building 664 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 664. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 664. At that time, this Air Compliance Guideline Document will be updated.

**BUILDING 664**

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track the annual usage of coatings, solvents, and other chemicals associated with maintenance activities, and architectural and maintenance painting operations.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Building 664 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with maintenance activities and, architectural and maintenance painting operations.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.).

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 664 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent**

**detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility, is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a stationary diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A



DATE: October 20, 1997  
TO: Cleve R. Tuck, 701 Building Manager, Bldg. 776, X2826  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 701 -  
GRK-301-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:

RMRS Records Management?

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 701 (DynCorp/SSOC)**

**INTRODUCTION**

Based on a summary of Building 701 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 701. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 701. At that time, this Air Compliance Guideline Document will be updated.

**Research and Development (R & D) Activities (2 requirements)**

**Requirement 1: For each research and development process, track the annual material throughput, including material type, material weight, and material concentrations of chemicals.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.1. i (b), and CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Each company with research and development processes in Building 701 must maintain records that track the annual material throughput, including material type, material weight, and concentrations of chemicals in each material.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual chemical/solvent usage associated with each research and development activity.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a

Action: Each company with research and development processes in Building 701 must maintain records that track the annual usage of chemicals and solvents used in conjunction with each process.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each stationary diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary diesel engine* exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent**

**detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

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**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODCs)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Transmittal:** Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Retention:** Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

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DATE: October 20, 1997

TO: Peter M. Sauer, 750 & 904 Pads Building Manager, Bldg. T893A, X5957

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *Gary*

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 750 & 904 Pad  
-GRK-302-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
750 AND 904 PADS (RMRS)**

**INTRODUCTION**

Based on a summary of 750 and 904 Pads activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities at 750 and 904 Pads. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities at 750 and 904 Pads. At that time, this Air Compliance Guideline Document will be updated.

**Repacking of Waste Containers (1 requirement)**

**Requirement 1: Track the number of drums and containers repackaged, the type of material in each drum or container, and concentrations of chemicals and radionuclides in each drum or container.**

**Driver:** CAQCC Regulation No. 3 Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

**Action:** Personnel must maintain records that track the number of drums and containers repackaged per year, the type of material in each drum and container, and concentrations of chemicals and radionuclides.

**Frequency:** Annual review of records

**Record Format:** Existing process tracking log or records, or an appropriate alternative

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

**Record Retention:** Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Sampling Activities (1 requirement)**

**Requirement 1: Track the number of containers sampled, the type of material in each container, and concentrations of chemicals and radionuclides in each container.**

**Driver:** CAQCC Regulation No. 3 Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: Personnel must maintain records that track the number of containers sampled per year, the type of material in each container, and concentrations of chemicals and radionuclides.

Frequency: Annual review of records

Record Format: Existing process tracking log or records, or an appropriate alternative

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**General Requirement for Disposal of Volatile Organic Compounds (VOCs)**  
**(1 requirement)**

**Requirement 1: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

**Driver:** CAQCC Regulation No. 7, Section V.A

**Action:** Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

**Frequency:** Ongoing

**Record Format:** N/A

**Signature Requirement:** N/A

**Record Transmittal:** N/A

**Record Retention:** N/A



DATE: October 20, 1997  
TO: Norman P. Cypher, 774 Building Manager, Bldg. 374, X5782  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 774 -  
GRK-303-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 774 OPERATIONS MANAGEMENT (SSOC)**

**INTRODUCTION**

Based on a summary of Building 774 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 774. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 774. At that time, the Air Compliance Guideline Document will be updated.

**BUILDING 774**

**Misc. Waste Handling (Bottle Box) (1 requirement)**

**Requirement 1: Track total annual through-put of cement, absorbent (i.e., Ramcoat®), and liquid waste.**

Driver: Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a

Action: Building 774 personnel must maintain records that track material type, total annual through-put of chemicals, additives, and/or radionuclides.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Second Stage Liquid Waste Treatment (1 requirement)**

**Requirement 1: Track total annual through-put of waste, process chemicals, and reagents.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Building 774 personnel must maintain records that track total annual through-put and concentrations of wastes, process chemicals and reagents.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a stationary diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track the annual usage of coatings, solvents, and other chemicals associated with Building 774 maintenance activities, and architectural and maintenance painting operations.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Building 774 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 774 maintenance activities, and architectural and maintenance painting operations.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.).

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

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Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Requirement 1:** Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Driver: CAQCC Regulation No. 15 and 40 CFR Part 82

Action: Each company must ensure operation, servicing, or disposal of all ODC-using equipment under their responsibility, is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01

Record Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Radionuclide Regulatory Compliance (6 requirements)**

**Requirement 1:** The differential pressure drop ( $\Delta p$ ) across High Efficiency Particulate Air (HEPA) filters must be checked and recorded per the appropriate building safety analysis document.

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide

National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)  
(CDPHE requests a copy of records during annual inspection)

Action: Building 774 personnel must monitor  $\Delta p$  across HEPA filter stages and record results, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing limiting conditions for operation (LCO) tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: The efficiency of Building HEPA filters must be tested and recorded, per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: Building 774 personnel must ensure HEPA filter efficiency is tested, and testing records are maintained, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing LCO tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: A HEPA filter must be replaced when it fails to meet the efficiency recommended in the appropriate building safety analysis document, and/or the  $\Delta p$  across the filter exceeds the threshold recommended in the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: When  $\Delta p$  across a building HEPA filter exceeds the threshold recommended in the appropriate building safety analysis document, or a building HEPA filter does not meet the efficiency recommended in the appropriate building safety analysis document, building personnel must ensure that the affected HEPA filter is replaced, and a record documenting the replacement is completed.

Frequency: As required

Record Format: Existing HEPA filter records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Records must be maintained and AQM must be notified of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.**

Driver: CAQCC Regulation No. 8A: Subpart A (40 CFR 61 Subpart A) General Provisions, Section 61.14

Action: Building 774 personnel must maintain records and notify AQM of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.

Frequency: As required

Record Format: Existing logbook

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: Building 774 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 5: Radionuclide emission measurements must be made at all significant release points which have a potential to discharge radionuclides into the air in quantities which could cause an effective dose equivalent (EDE) in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Significant Radionuclide Release Point in Building 774:

774-202

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must ensure that radionuclide emission measurements are made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR Part 61, Subpart H.

Frequency: Continuous

Record Format: Existing monitoring record format

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: AQM must maintain monitoring records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Ensure that radionuclide emission measurements are being made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must work with building personnel to confirm that each point source location that exceeds a potential EDE of 1% of the 10 millirem Site standard is being monitored in accordance with CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs.

Frequency: Quarterly

Record Format: AQM Rad NESHAPs compliance form (currently being developed)

Signature Requirement: Responsible building representative

Record Transmittal: N/A

Record Retention: AQM must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.



DATE: October 20, 1997  
TO: Cleve R. Tuck, 776/777 Building Manager, Bldg. 776, X2826  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 776/777-GRK-304-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDINGS 776/777 (SSOC/RMRS)**

**INTRODUCTION**

Based on a summary of Buildings 776/777 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Buildings 776/777. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Buildings 776/777. At that time, this Air Compliance Guideline Document will be updated.

**Permitted Supercompactor and Repackaging Facility (4 requirements)  
(RMRS)**

The requirements listed below apply to the following permitted (permit number 91JE047) supercompactor and repackaging facility under your responsibility:

**Requirement 1: Visible emissions from the exhaust vent #32 shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 91JE047

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). Responsible personnel must work with Air Quality Management (AQM) to schedule annual opacity observations.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit a copy of the completed form to a RMRS designated representative

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Processing of transuranic waste shall not exceed 33,550 cubic feet per year or 124 tons per year. Compliance with this limit shall be based on a 12 month rolling total. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 3 in permit number 91JE047

Action: Responsible personnel must record the amount of transuranic waste processed.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: Responsible personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.**

Driver: Condition number 5 in permit number 91JE047

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 91JE047

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Research and Development Activities (2 requirements)**

**Requirement 1: For each research and development process, track the annual material throughput, to include material type, material weight, and concentrations of chemicals and radionuclides.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.1. i (b), CAQCC Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

Action: Research and development process personnel must maintain records that track the annual material throughput, including material type, material weight, and concentrations of chemicals and radionuclides in each material.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual chemical/solvent usage associated with each research and development activity.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a

Action: Research and development process personnel must maintain records that track the annual chemical/solvent usage for each research and development process in Buildings 776/777.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Research and development process personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Venting and Head Space Gas Sampling of Drums/Containers (1 requirement)**  
**(RMRS)**

**Requirement 1: Track the number of drums/containers vented and head space gas sampled each year.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: Personnel must maintain records that track the number of drums/containers vented and head space gas sampled per year.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

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Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Waste Repack, Sampling, and Characterization of Drums/Containers**  
**(1 requirement) (RMRS)**

**Requirement 1: Track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and concentrations of chemicals and radionuclides in each drum/container.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: Personnel must maintain records that track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and concentrations of chemicals and radionuclides in each drum/container.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Permitted Diesel Fuel Fired Equipment (4 requirements)**

The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:

a) Building 776, Emergency Generator, Caterpillar 3512, Serial No. 24Z01011

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health

and Environment (CDPHE). The operator must work with Air Quality Management (AQM) to schedule annual opacity observations.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record hours of operation by each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: Operator of the unit must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3:** At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Driver: Condition number 5 in permit number 93JE1349

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4:** A copy of the permit must be retained and made available for inspection upon request.

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Buildings 776/777 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a

Action: Buildings 776/777 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Buildings 776/777 maintenance activities, and architectural and maintenance painting activities.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Buildings 776/777 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Registered ODC-using equipment in Building 776:**

- 1) AQD #776-004
- 2) AQD #776-005

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility, is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

### Radionuclide Regulatory Compliance (6 requirements)

**Requirement 1: The differential pressure drop ( $\Delta p$ ) across High Efficiency Particulate Air (HEPA) filters must be checked and recorded per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs) (CDPHE requests a copy of records during annual inspection)

Action: Buildings 776/777 personnel must monitor  $\Delta p$  across HEPA filter stages and record results, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing limiting conditions for operation (LCO) tracking form or an appropriate alternative

Signature Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Buildings 776/777 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: The efficiency of Building HEPA filters must be tested and recorded, per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: Buildings 776/777 personnel must ensure HEPA filter efficiency is tested, and testing records are maintained, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing LCO tracking form or an appropriate alternative

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Buildings 776/777 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: A HEPA filter must be replaced when it fails to meet the efficiency recommended in the appropriate building safety analysis document, and/or the  $\Delta p$  across the filter exceeds the threshold recommended in the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: When  $\Delta p$  across a building HEPA filter exceeds the threshold recommended in the appropriate building safety analysis document, or a building HEPA filter does not meet the efficiency recommended in the appropriate building safety analysis document, building personnel must ensure that the affected HEPA filter is replaced, and a record documenting the replacement is completed.

Frequency: As required

Record Format: Existing HEPA filter records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Buildings 776/777 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Records must be maintained and AQM must be notified of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.**

Driver: CAQCC Regulation No. 8A: Subpart A (40 CFR 61 Subpart A) General Provisions, Section 61.14

Action: Buildings 776/777 personnel must maintain records and notify AQM of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.

Frequency: As required

Record Format: Existing logbook

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: Buildings 776/777 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 5: Radionuclide emission measurements must be made at all significant release points which have a potential to discharge radionuclides into the air in quantities which could cause an effective dose equivalent (EDE) in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Significant Radionuclide Release Points in Buildings 776/777:

776-201    776-206  
776-204    776-207  
776-205

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must ensure that radionuclide emission measurements are made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR Part 61, Subpart H.

Frequency: Continuous

Record Format: Existing monitoring record format

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: AQM must maintain monitoring records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Ensure that radionuclide emission measurements are being made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must work with building personnel to confirm that each point source location that exceeds a potential EDE of 1% of the 10 millirem Site standard is being monitored in accordance with CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs.

Frequency: Quarterly  
Record Format: AQM Rad NESHAPs compliance form (currently being developed)

Signature Requirement: Responsible building representative

Record Transmittal: N/A

Record Retention: AQM must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

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**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
776	25	7760128					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

\_\_\_\_\_  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.

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DATE: October 20, 1997  
TO: Kelly D. Trice, 779 Building Manager, Bldg. T130F, X6383  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 779-GRK-305-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 779 (SSOC)**

**INTRODUCTION**

Based on a summary of Building 779 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 779. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 779. At that time, this Air Compliance Guideline Document will be updated.

**Permitted Diesel Fuel Fired Equipment (4 requirements)**

**The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:**

- a) Building 727, Emergency Generator, Detroit V1671T, Serial No. 16VA6861
- b) Building 729, Emergency Generator, Allis-Chalmers DYG15R2387, Serial No. 0472438482
- c) Building 779, Emergency Generator, Caterpillar D343A, Serial No. 62B1829

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). The operator must work with Air Quality Management (AQM) to schedule annual opacity observations.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent**

**12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record hours of operation by each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: Operator of the unit must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.**

Driver: Condition number 5 in permit number 93JE1349

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature Requirement: N/A

Record Transmittal: N/A

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at an location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 779 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a

Action: Building 779 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 779 maintenance activities, and architectural and maintenance painting activities.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 779 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million.

Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

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Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Registered ODC-using equipment in Building 779:**

- 1) AQD #779-006
- 2) AQD #779-007
- 3) AQD #779-008
- 4) AQD #779-009

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature  
Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Radionuclide Regulatory Compliance (6 requirements)**

**Requirement 1: The differential pressure drop ( $\Delta p$ ) across High Efficiency Particulate Air (HEPA) filters must be checked and recorded per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs) (CDPHE requests a copy of records during annual inspection)

Action: Building 779 personnel must monitor  $\Delta p$  across HEPA filter stages and record results, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing limiting conditions for operation (LCO) tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Building 779 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: The efficiency of Building HEPA filters must be tested and recorded, per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: Building 779 personnel must ensure HEPA filter efficiency is tested, and testing records are maintained, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing LCO tracking form or an appropriate alternative

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 779 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: A HEPA filter must be replaced when it fails to meet the efficiency recommended in the appropriate building safety analysis document, and/or the  $\Delta p$  across the filter exceeds the threshold recommended in the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: When  $\Delta p$  across a building HEPA filter exceeds the threshold recommended in the appropriate building safety analysis document, or a building HEPA filter does not meet the efficiency recommended in the appropriate building safety analysis document, building personnel must ensure that the affected HEPA filter is replaced, and a record documenting the replacement is completed.

Frequency: As required

Record Format: Existing HEPA filter records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Building 779 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Records must be maintained and AQM must be notified of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.**

Driver: CAQCC Regulation No. 8A: Subpart A (40 CFR 61 Subpart A) General Provisions, Section 61.14

Action: Building 779 personnel must maintain records and notify AQM of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.

Frequency: As required

Record Format: Existing logbook

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: Building 779 personnel must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 5: Radionuclide emission measurements must be made at all significant release points which have a potential to discharge radionuclides into the air in quantities which could cause an effective dose equivalent (EDE) in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Significant Radionuclide Release Points in Building 779:

779-782  
779-729

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must ensure that radionuclide emission measurements are made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR Part 61, Subpart H.

Frequency: Continuous

Record Format: Existing monitoring record format

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: AQM must maintain monitoring records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Ensure that radionuclide emission measurements are being made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must work with building personnel to confirm that each point source location that exceeds a potential EDE of 1% of the 10 millirem Site standard is being monitored in accordance with CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs.

Frequency: Quarterly

Record Format: AQM Rad NESHAPs compliance form (currently being developed)

Signature Requirement: Responsible building representative

Record Transmittal: N/A

Record Retention: AQM must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

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**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
727	22	7270137					
		500 kW Generator					
729	23	7290136					
		150 kW Generator					
779	26	7790128					
		250 kW Generator					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

\_\_\_\_\_  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.



DATE: October 20, 1997

TO: Henrick B. Padron, 865 Building Manager, Bldg. 881, X7357

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *AK*

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 865 - GRK-306-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 865 (MSC/RMRS)**

**INTRODUCTION**

Based on a summary of Building 865 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 865. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 865. At that time, this Air Compliance Guideline Document will be updated.

**Stage II - Declassification and Decontamination (2 requirements)**

**Requirement 1: Track the levels of contamination and the approximate square footage (surface area) of materials decontaminated utilizing CO<sub>2</sub> blasting.**

**Driver:** Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

**Action:** MSC personnel must maintain records that track the levels of contamination and approximate annual square footage of materials decontaminated by CO<sub>2</sub> blasting.

**Frequency:** Annual review of records

**Record Format:** Tracking log

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual Colorado Department of Public Health and Environment (CDPHE) inspection.

**Record Retention:** Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual chemical/solvent usage.**

**Driver:** CAQCC Regulation No. 3, Part A, Section II.D.4.a

**Action:** MSC personnel must maintain records that track the annual chemical/solvent usage for National Conversion Pilot Program (NCPP) activities in Building 865.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: MSC Building 865 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Permitted Diesel Fuel Fired Equipment (4 requirements)**

The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:

a) Building 827, Caterpillar D348, Serial No. 38J386

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). The operator must work with Air Quality Management (AQM) to schedule annual opacity observations.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

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**Requirement 2:** Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record hours of operation for each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: Operator of the unit must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3:** At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Driver: Condition number 5 in permit number 93JE1349

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature Requirement: N/A

Record Transmittal: N/A

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each stationary diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 865 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Building 865 maintenance personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 865 maintenance activities, and architectural and maintenance painting activities.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million.

Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODCs)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature  
Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record  
Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Research and Development Activities (2 requirements)**

**Requirement 1: For each research and development process, track the annual material throughput, including material type, material weight, and material concentrations of chemicals and radionuclides.**

**Driver:** CAQCC Regulation No. 3 Part A, Section II.D.1. i (b), CAQCC Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

**Action:** Each company with research and development processes in Building 865 must maintain records that track the annual material throughput, including material type, material weight, and material concentrations of chemicals and radionuclides.

**Frequency:** Annual review of records

**Record Format:** Existing process tracking log or records

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

**Record Retention:** Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual chemical/solvent usage associated with each research and development activity.**

**Driver:** CAQCC Regulation No. 3 Part A, Section II.D.4.a

**Action:** Each company with research and development processes in Building 865 must maintain records that track the annual usage of chemicals and solvents used in conjunction with each process.

**Frequency:** Annual review of records

**Record Format:** Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

**Signature Requirement:** N/A

**Record**

**Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

**Record**

**Retention:** Research and development process personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
427	N/A	4274780					
827	28	8651905					
881G	29 (1400 kW unit)	39077					
881G	30 (400 kW unit)	8810014					
989	N/A	9910135					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

Jeff Bowick      Bldg. 881  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.

*JS*



DATE: October 20, 1997  
TO: Henrick B. Padron, 881 Building Manager, Bldg. 881, X7357  
FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *AK*  
SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 881 -  
GRK-307-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 881 (RMRS)**

**INTRODUCTION**

Based on a summary of Building 881 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 881. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 881. At that time, this Air Compliance Guideline Document will be updated.

**Laboratory Operations (2 requirements)**

**Requirement 1: Track the annual usage of laboratory chemicals (organics, acids, etc.) for each laboratory.**

Driver: Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a

Action: Each company with laboratory operations in Building 881 must maintain records that track the annual chemical/solvent usage for each laboratory.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual Colorado Department of Public Health and Environment (CDPHE) inspection.

Record Retention: Each company must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the numbers of each test performed per laboratory.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Each company with laboratory operations in Building 881 must maintain records that track the numbers of tests performed in each laboratory operation.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Each company must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

### **Research and Development Activities (2 requirements)**

**Requirement 1: For each research and development process, track the annual material throughput, including material type, material weight, and material concentrations of chemicals and radionuclides.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.1. i (b), CAQCC Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

Action: Each company with research and development processes in Building 881 must maintain records that track the annual material throughput, including material type, material weight, and concentrations of chemicals and radionuclides in each material.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual chemical/solvent usage associated with each research and development activity.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Each company with research and development processes in Building 881 must maintain records that track the annual usage of chemicals and solvents used in conjunction with each process.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Paint Can Puncturing and Draining Process (2 requirements)**

**Requirement 1: The number of paint cans punctured and drained must be tracked.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Process personnel must maintain records that track the number of paint cans punctured and drained.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the number of paint collection drums that are shipped out from the can puncturing process.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Process personnel must maintain records that track the number of collection drums that are shipped out from the can puncturing process.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Waste Repack, Sampling, and Characterization (1 requirement)**

**Requirement 1: For each waste repack, sampling, and/or characterization area, track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and material concentrations of chemicals and radionuclides.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: For each waste repack, sampling, and/or characterization area, each responsible company must maintain records that track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and material concentrations of chemicals and radionuclides.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Permitted Diesel Fuel Fired Equipment (4 requirements)**

The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:

- a) Building 881 G, Generator, Caterpillar 3516, Serial No. 25Z00696
- b) Building 881 G, Generator, Caterpillar D318, Serial No. 36J1999

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). The operator must work with Air Quality Management (AQM) to schedule annual opacity observation.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record hours of operation by each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature

Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record  
Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record  
Retention: Operator of the unit must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.**

Driver: Condition number 5 in permit number 93JE1349

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 881 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Building 881 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 881 maintenance activities, and architectural and maintenance painting activities.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODCs)**

**(1 requirement)**

**Registered ODC-using equipment in Building 881:**

- 1) AQD #881-010
- 2) AQD #881-011
- 3) AQD #881-012

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

**Driver:** CAQCC Regulation No. 15, and 40 CFR Part 82

**Action:** Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Frequency:** Ongoing

**Record Format:** Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Signature Requirement:** Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Transmittal:** Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Retention:** Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
427	N/A	4274780					
827	28	8651905					
881G	29 (1400 kW unit)	39077					
881G	30 (400 kW unit)	8810014					
989	N/A	9910135					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

Jeff Bowick      Bldg. 881  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.

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DATE: October 20, 1997

TO: Henrick B. Padron, 883 Building Manager, Bldg. 881, X7357

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *Gary*

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 883 - GRK-308-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 883 (MSC/RMRS)**

**INTRODUCTION**

Based on a summary of Building 883 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 883. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 883. At that time, this Air Compliance Guideline Document will be updated.

**Stage II - Declassification and Decontamination (2 requirements)**

**Requirement 1: Track the levels of contamination and the approximate square footage (surface area) of materials decontaminated utilizing CO<sub>2</sub> blasting.**

**Driver:** Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

**Action:** MSC personnel must maintain records that track the levels of contamination and approximate annual square footage of materials decontaminated by CO<sub>2</sub> blasting.

**Frequency:** Annual review of records

**Record Format:** Tracking log

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual Colorado Department of Public Health and Environment (CDPHE) inspection.

**Record Retention:** Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the annual chemical/solvent usage.**

**Driver:** CAQCC Regulation No. 3, Part A, Section II.D.4.a

**Action:** MSC personnel must maintain records that track the annual chemical/solvent usage for National Conversion Pilot Program (NCP) activities in Building 883.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: MSC Building 883 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each stationary diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 883 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

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**Action:** Building 883 personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Building 883 maintenance activities, and architectural and maintenance painting activities.

**Frequency:** Annual review of records

**Record Format:** Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

**Signature Requirement:** N/A

**Record Transmittal:** AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

**Record Retention:** Building 883 personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment:** All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

**Driver:** CAQCC Regulation No. 7, Section III.A

**Action:** Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

**Frequency:** Ongoing

**Record Format:** N/A

**Signature Requirement:** N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.**

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.



DATE: October 20, 1997

TO: Sharon L. Wilson, 991 Building Manager, Bldg. 991, X4193

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *Gary*

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 991 -  
GRK-309-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:  
RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
BUILDING 991 (RMRS)**

**INTRODUCTION**

Based on a summary of Building 991 activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities in Building 991. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities in Building 991. At that time, this Air Compliance Guideline Document will be updated.

**Laboratory Operations (1 requirement)**

**Requirement 1: Track the annual usage of laboratory chemicals (organics, acids, etc.) for each laboratory.**

Driver: Colorado Air Quality Control Commission (CAQCC) Regulation No. 3 Part A, Section II.D.4.a

Action: Each company with laboratory operations in Building 991 must maintain records that track the annual chemical/solvent usage.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual Colorado Department of Public Health and Environment (CDPHE) inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Waste Repack, Sampling, and Characterization (1 requirement)**

**Requirement 1: For each waste repack, sampling, and/or characterization area, track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and material concentrations of chemicals and radionuclides.**

Driver: Colorado Air Quality Control Commission (CAQCC) Regulation No. 3, Part A, Section II.D.4.a, and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs)

Action: For each waste repack, sampling, and/or characterization area, each responsible company must maintain records that track the number of drums/containers repacked, sampled, and/or characterized per year, the type of material in each drum/container, and material concentrations of chemicals and radionuclides.

Frequency: Annual review of records

Record Format: Existing process tracking log or records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

#### **Permitted Diesel Fuel Fired Equipment (4 requirements)**

The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:

a) Building 989, Emergency Generator, Caterpillar D343, Serial No. 82B11442

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the Colorado Department of Public Health and Environment (CDPHE). The operator must work with Air Quality Management (AQM) to schedule annual opacity observations.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature  
Requirement: N/A

Record  
Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record  
Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record hours of operation by each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature  
Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record  
Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record  
Retention: Operator of the unit must maintain record for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.**

Driver: Condition number 5 in permit number 93JE1349

Action: Operator must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Operator must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a *stationary* diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track annual usage of coatings, solvents, and other chemicals associated with Building 991 maintenance activities, and architectural and maintenance painting activities.**

Driver: CAQCC Regulation No. 3 Part A, Section II.D.4.a

Action: Records must be maintained that track the annual usage of coatings, solvents, and other chemicals associated with Building 991 maintenance activities, and architectural and maintenance painting activities.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Records must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment:** All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids):** All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODCs)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

Driver: CAQCC Regulation No. 15, and 40 CFR Part 82

Action: Each company must ensure that operation, servicing, or disposal of all ODC-using equipment under their responsibility is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

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Frequency: Ongoing

Record Format: Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Signature Requirement: Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Transmittal: Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

Record Retention: Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Radionuclide Regulatory Compliance (6 requirements)**

**Requirement 1: The differential pressure drop ( $\Delta p$ ) across High Efficiency Particulate Air (HEPA) filters must be checked and recorded per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Radionuclide National Emission Standards for Hazardous Air Pollutants (Rad NESHAPs) (CDPHE requests a copy of records during annual inspection)

Action: Building 991 personnel must monitor  $\Delta p$  across HEPA filter stages and record results, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing limiting conditions for operation (LCO) tracking form or an appropriate alternative

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Record must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: The efficiency of Building HEPA filters must be tested and recorded, per the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: Building 991 personnel must ensure HEPA filter efficiency is tested, and testing records are maintained, as required in the appropriate building safety analysis document.

Frequency: As required

Record Format: Existing LCO tracking form or an appropriate alternative

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Record must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: A HEPA filter must be replaced when it fails to meet the efficiency recommended in the appropriate building safety analysis document, and/or the  $\Delta p$  across the filter exceeds the threshold recommended in the appropriate building safety analysis document.**

Driver: CAQCC Regulation No. 3 Part C, Section V. C. 5 (Operating Permit) and CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs (CDPHE requests a copy of records during annual inspection)

Action: When  $\Delta p$  across a building HEPA filter exceeds the threshold recommended in the appropriate building safety analysis document, or a building HEPA filter does not meet the efficiency recommended in the appropriate building safety analysis document, building personnel must ensure that the affected HEPA filter is replaced, and a record documenting the replacement is completed.

Frequency: As required

Record Format: Existing HEPA filter records

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Record must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: Records must be maintained and AQM must be notified of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.**

Driver: CAQCC Regulation No. 8A: Subpart A (40 CFR 61 Subpart A) General Provisions, Section 61.14

Action: Building 991 personnel must maintain records and notify AQM of all occurrences during which an air radionuclide effluent monitoring system is inoperative, including the duration of each occurrence.

Frequency: As required

Record Format: Existing logbook

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: Record must be maintained for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 5: Periodic confirmatory radionuclide emission measurements must be made at all release points which have a potential to discharge radionuclides into the air.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must ensure that periodic confirmatory radionuclide emission measurements are made at all release points which have a potential to discharge radionuclides into the air.

Frequency: Continuous

Record Format: Existing monitoring record format

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: AQM must maintain monitoring records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 6: Ensure that radionuclide emission measurements are being made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an Effective Dose Equivalent (EDE) in excess of 1% of the standard specified in 40 CFR, Part 61, Subpart H.**

Driver: CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs

Action: AQM must work with building personnel to confirm that each point source location that exceeds a potential EDE of 1% of the 10 millirem Site standard is being monitored in accordance with CAQCC Regulation No. 8A: Subpart H (40 CFR 61 Subpart H) Rad NESHAPs.

Frequency: Quarterly

Record Format: AQM Rad NESHAPs compliance form (currently being developed)

Signature Requirement: Responsible building representative

Record Transmittal: N/A

Record Retention: AQM must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

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**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
427	N/A	4274780					
827	28	8651905					
881G	29 (1400 kW unit)	39077					
881G	30 (400 kW unit)	8810014					
989	N/A	9910135					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

Jeff Bowick      Bldg. 881  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.



DATE: October 20, 1997

TO: Frank M. Huffman, 995 Building Manager, Bldg. 995; X6290

FROM: Gary Konwinski, RMRS Environmental Manager, Bldg. 116, X2729 *Gary*

SUBJECT: AIR COMPLIANCE GUIDELINE DOCUMENTS FOR BUILDING 995 - GRK-310-97

Attached, please find Air Compliance Guideline Documents (ACGDs) for activities/buildings under your responsibility. The ACGDs contain Clean Air Act (CAA) compliance requirements specific to current activities in each building or area under your responsibility and should be placed in the CAA information section of the appropriate building book, or similar floor level document. The ACGDs serve as a guide to assist Site personnel with the identification of applicable regulatory and recordkeeping requirements, and provide an audit trail for compliance certification.

The ACGDs will be used by Air Quality Management, K-H, to audit your environmental air quality compliance program. The ACGDs are not controlled documents, but carry a revision notation for tracking purposes. Please remember these documents are designed to assist you in demonstrating compliance and revisions to the ACGDs can be suggested by RMRS at any time.

If you have any questions, please feel free to call.

VLO

Attachment: As Stated

cc:

RMRS Records Management

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**AIR COMPLIANCE GUIDELINE DOCUMENT  
SEWAGE TREATMENT PLANT (RMRS)**

**INTRODUCTION**

Based on a summary of Sewage Treatment Plant activities, operations, and material usage, the following compliance requirements apply and must be met to demonstrate compliance with the Clean Air Act. This guideline document is specific to current activities at the Sewage Treatment Plant. Kaiser-Hill Air Quality Management (AQM) must be notified of any future planned activities or changes to existing activities at the Sewage Treatment Plant. At that time, the Air Compliance Guideline Document will be updated.

**Permitted Diesel Fuel Fired Equipment (4 requirements)**

The requirements listed below apply to the following permitted (permit number 93JE1349) diesel fuel fired equipment under your responsibility:

- a) Building 995 (portable), John Deere Compressor, Engine Serial No. ND109658
- b) Building 995 (portable), Emergency Generator, Caterpillar Engine Serial No. 2WB08984

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed twenty percent (20%) opacity.**

Driver: Condition number 1 in permit number 93JE1349

Action: Compliance is currently demonstrated by an annual opacity observation performed by representatives from the CDPHE. The operator is responsible for working with AQM to schedule annual opacity observation.

Frequency: Annual

Record Format: Form supplied and completed by CDPHE

Signature Requirement: N/A

Record Transmittal: AQM will transmit copy of completed form to appropriate building/environmental representative.

Record Retention: AQM will maintain records associated with opacity observations. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Total Site consumption of diesel fuel blend (#1 and #2) by units listed in the permit shall not exceed 200,000 gallons per year. Compliance with this limit shall be based on a 12 month rolling average. The most recent 12 months of consumption data shall be totalled to determine compliance with the limit listed above.**

Driver: Condition number 4 in permit number 93JE1349

Action: The operator must record the hours of operation by each unit. AQM is responsible for interpreting the data and determining compliance.

Frequency: Monthly

Record Format: See attached form

Signature Requirement: Supervisor and preparer must sign monthly compliance form to verify accuracy and completeness.

Record Transmittal: Compliance form must be completed and faxed to AQM by the close of business of the last working day of the first week of each month.

Record Retention: Operator of the unit must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the state, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.**

Driver: Condition number 5 in permit number 93JE1349

Action: Sewage Treatment Plant personnel must follow proper operating and maintenance procedures.

Frequency: Ongoing

Record Format: Existing maintenance records

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 4: A copy of the permit must be retained and made available for inspection upon request.**

Driver: General Terms and Conditions number 4 in permit number 93JE1349

Action: Sewage Treatment Plant personnel must retain a current copy of the permit either at the equipment's location, in the operations manager's office, or at a central location of the operator's choice.

Frequency: N/A

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**All Diesel Fuel Fired Equipment (1 requirement)**

**The requirement listed below applies to all diesel fuel fired equipment (stationary sources) under your responsibility.**

**Requirement 1: Visible emissions from each diesel engine exhaust stack shall not exceed 20% opacity.**

Driver: CAQCC Regulation No. 1, Section II.A.1

Action: If visible emissions are observed from a stationary diesel engine exhaust stack after initial start-up, notify AQM for an opacity evaluation.

Frequency: Observe for visible emissions whenever subject equipment is in operation.

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Building T974, Belt Filter Press (1 requirement)**

**Requirement 1: Track the quantity of sludge processed annually.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Sewage Treatment Plant personnel must maintain records that track the quantity of sludge processed annually in the belt filter press.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Buildings 988, 990, and 995, Wastewater Treatment Operations (3 requirements)**

**Requirement 1: Track the flow rate of wastewater entering and processed by the facility on a daily basis.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Sewage Treatment Plant personnel must maintain records that track the flow rate of wastewater entering and processed by the facility on a daily basis.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature Requirement: N/A

Record Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 2: Track the quantity of sludge produced annually.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Sewage Treatment Plant personnel must maintain records that track the quantity of sludge produced annually.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Requirement 3: Track the quantity of chlorine, sulfur dioxide, and lime used annually in the chlorine contact basin and tertiary clarifier.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Sewage Treatment Plant personnel must maintain records that track the quantity of chlorine, sulfur dioxide, and lime used annually in the chlorine contact basin and tertiary clarifier.

Frequency: Annual review of records

Record Format: Existing recordkeeping system

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Chemical Usage (1 requirement)**

**Requirement 1: Track the annual chemical/solvent usage.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Sewage Treatment Plant personnel must maintain records that track the annual chemical/solvent usage by the Sewage Treatment Plant.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.)

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Building Maintenance Chemical Usage (1 requirement)**

**Requirement 1: Track the annual usage of coatings, solvents, and other chemicals associated with Sewage Treatment Plant maintenance activities, and architectural and maintenance painting operations.**

Driver: CAQCC Regulation No. 3, Part A, Section II.D.4.a

Action: Sewage Treatment Plant personnel must maintain records that track the annual usage of coatings, solvents, and other chemicals associated with Sewage Treatment Plant maintenance activities, and architectural and maintenance painting operations.

Frequency: Annual review of records

Record Format: Existing recordkeeping system (Integrated Chemical Management System, purchase records, usage logs, etc.).

Signature  
Requirement: N/A

Record  
Transmittal: AQM will coordinate annual review of records, usually in concurrence with annual CDPHE inspection.

Record  
Retention: Sewage Treatment Plant personnel must maintain records for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**General Requirements for Storage, Transfer, and Disposal of Volatile Organic Compounds (VOCs) (3 requirements)**

**Requirement 1: Maintenance and Operation of VOC Storage Tanks and Related Equipment: All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.**

Driver: CAQCC Regulation No. 7, Section III.A

Action: Work practice requires that VOC storage tanks and related equipment be properly maintained and operated to prevent detectable vapor loss. Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. If an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 parts per million. Testing and monitoring shall be conducted as in CAQCC Regulation No. 7 Section VIII.C.3.

Frequency: Ongoing

Record Format: N/A

Signature  
Requirement: N/A

Record  
Transmittal: N/A

Record  
Retention: N/A

**Requirement 2: Transfer of VOCs (excluding Petroleum Liquids): All VOCs transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach**

within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

Driver: CAQCC Regulation No. 7, Section III.B

Action: Work practice requires that the transfer of VOCs to any tank, container, or vehicle compartment as described above must meet this filling requirement.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Requirement 3: Disposal of VOCs: Personnel shall not dispose of VOCs by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized. Contact AQM for RACT determination.**

Driver: CAQCC Regulation No. 7, Section V.A

Action: Work practice requires that VOCs are not disposed of by evaporation or spillage (e.g. lids removed to intentionally evaporate paints, solvents, etc.) unless RACT is utilized.

Frequency: Ongoing

Record Format: N/A

Signature Requirement: N/A

Record Transmittal: N/A

Record Retention: N/A

**Refrigeration Equipment Using Ozone Depleting Compounds (ODC)**  
**(1 requirement)**

**Requirement 1: Operation, servicing, or disposal of all ODC-using equipment must be performed in accordance with Air Quality Management's "Refrigeration**

**System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.**

**Driver:** CAQCC Regulation No. 15 and 40 CFR Part 82

**Action:** Each company must ensure operation, servicing, or disposal of all ODC-using equipment under their responsibility, is performed in accordance with Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Frequency:** Ongoing

**Record Format:** Appropriate recordkeeping systems described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Signature Requirement:** Appropriate signatures as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Transmittal:** Appropriate record transmittal as described in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01.

**Record Retention:** Records must be maintained as specified in Air Quality Management's "Refrigeration System Compliance Guide", and the "Stratospheric Ozone Protection Procedure", No. 1-D61-EPR-AQ.01 for a period of five years in an accessible location. Records must be made available for auditing/inspection purposes within 48 hours, if requested.

**Kaiser•Hill/Compliance & Performance Assurance/Air Quality Management  
 Monthly Compliance Demonstration for Title V Operating Permit  
 Diesel Fuel Fired Internal Combustion Engine (ICE) Equipment**

Readings to be taken during the last week of each month, please print clearly.

\*\*\*Note: If the hour meter is replaced, record final reading before replacement, then record reading on new meter.

Building or Unit	Air Emissions Inventory #	DOE Property Number	Hour Meter Reading	Date of Reading	Time of Reading	Reader's Name (Print)	Reader's Initials
995	N/A	88515 (Sul. Comp.)					
995	N/A	60386 (Cat. Gen.)					

I certify that all information provided is accurate and complete to the best of my knowledge:

\_\_\_\_\_  
 Print Name/Signature (Supervision Signature Required)      Bldg      Cubicle      Extension

\_\_\_\_\_  
 Record Custodian (Print Name)      Location of Record

Fax completed form to Air Quality Management, T130C, fax# 966-3578, by close of business (day shift) of the last working day of each month (earlier submittals appreciated). Call extension X2609 if you have any questions.

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