



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAR 16 1993

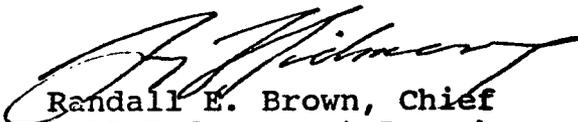
Mr. Ralph R. DeFeo
Corporate Counsel
MG Industries
3 Great Valley Parkway
Malvern, Pennsylvania 19355-1424

Dear Mr. DeFeo:

Pursuant to your letter of March 2, 1993, we have written Los Alamos National Laboratory to acknowledge that Region 6 has no objections to your program of purchasing gas cylinders for reconditioning and resale. (Please see enclosure.)

If you need further assistance or have any questions, please contact Joel M. Dougherty of my staff at (214) 655-2281.

Sincerely yours,


Randall E. Brown, Chief
RCRA Enforcement Branch

Enclosure





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DALLAS, TX 75202-2733

MAR 19 1993

Mr. Jeff Carmichael
Los Alamos National Laboratory
P.O. Box 1663
Los Alamos, New Mexico 87545

Dear Mr. Carmichael:

At the request of Mr. Rainer Land and Mr. Ralph DeFeo of MG Industries, I am sending you this letter in regards to MG Industries' desire to purchase existing compressed gas cylinders from Los Alamos National Laboratory.

Based on correspondence from Mr. DeFeo and documents provided by his office, this office understands that the referenced cylinders will be transported to MG's Pennsylvania facility where the residue from the cylinders will be removed and processed pursuant to an air discharge permit. The permit was issued to MG by the Pennsylvania Department of Environmental Resources. (Please see enclosures.)

As we have stated previously, this office has no objections to the program, and the program does not trigger Resource Conservation and Recovery Act hazardous waste regulations.

If you need further assistance or have any questions, please contact Joel M. Dougherty of my staff at (214) 655-2281.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Allyn M. Davis".

Allyn M. Davis, Director
Hazardous Waste Management Division

Enclosures

cc: Ralph DeFeo, MG Industries
EPA Region 3 (Mary Letzkus, 3HW-62)
NMED





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DALLAS, TX 75202-2733

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DEC 16 1992

EPA PARTMENT

Mr. Ralph R. DeFeo
Corporate Counsel
M G Industries
P.O. Box 849
Morrisville, PA 19067

Dear Mr. DeFeo:

Thank you for your letter of November 12, 1992, requesting an update, if any, of our position regarding your intention to purchase existing compressed gas cylinders from Los Alamos National Laboratory (LANL) and process the hazardous residues removed from these cylinders at your Pennsylvania facility.

The position taken in our July 1, 1991, letter to you has not changed. We understand that you intend to reuse the purchased cylinders in a manner consistent with a permit you have for such activities, issued by the State of Pennsylvania. We do not believe that such reuse triggers RCRA solid waste regulation.

Should you have any further questions regarding this issue, please contact Mr. Joseph Schultes, of my staff at (214) 655-2192.

Sincerely yours,

Allyn M. Davis

Allyn M. Davis, Director
Hazardous Waste Management Division (6H)

cc: EPA Region 3 (Mary Letzkus) (3HW-62)
NMED
Harry T. Season, Jr. (LANL)





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428
215 832-6212

May 3, 1991

Mr. Herbert N. Rudolph
President
MG Industries
2460 Boulevard of the General
P.O. Box 945
Valley Forge, PA 19482

RECEIVED
5/14

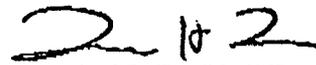
Dear Mr. Rudolph:

In response to your letter of April 17, 1991 approval is granted for you to accept compressed gas cylinders from off-site facilities for processing residual gas remaining in the cylinders before they are refilled with gas products at your cylinder fill facility located in Fairless Hills, Falls Township, Bucks County.

This must be done in accordance with your air quality permit No. 09-313-056.

This proposal does not require a hazardous waste permit.

Very truly yours,


LAWRENCE H. LUNSK
Facilities Manager

cc: Mr. McGinley
Ms. Kurtz
Mr. Lee - EPA Philadelphia
Re 30 (4)120.16

Send to
Los Alamos
NHL Lab
Enclosure

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF AIR QUALITY CONTROL

ATG

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8, 1960, L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the rules and regulations of the Department of Environmental Resources, the Department hereby issues this permit for the operation of the air contamination source(s) described below.

Permit No.	<u>09-313-056</u>	Source(s)	<u>Residual Cylinder Gases</u>
Owner	<u>M G Industries</u>	Air	<u>See Attached Sheet</u>
Address	<u>P.O. Box 849</u>	Cleaning	<u>•</u>
	<u>Morrisville, PA 19067</u>	Device	<u>•</u>
Attention	<u>Mr. Robert T. Woodbury</u>	Location	<u>Steel Road</u>
	<u>Manager of Engineering</u>		<u>Falls Township</u>
			<u>Bucks County</u>

This permit is subject to the following conditions:

- (1) That the source(s) and any associated air cleaning devices are to be:
 - (a) operated in such a manner as not to cause air pollution;
 - (b) in compliance with the specifications and conditions of the plan approval issued under the same number;
 - (c) operated and maintained in a manner consistent with good operating and maintenance practices.
- (2) This permit is valid only for the specific equipment, location and owner named above.

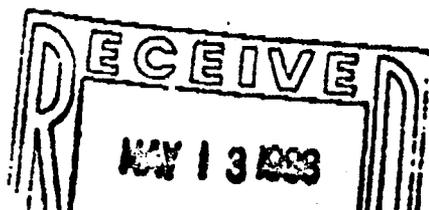
(SEE THE ATTACHED ADDITIONAL CONDITIONS)

Failure to comply with the conditions placed on this permit is a violation of Section 127.25. Violation of this or any other provision of Article III of the rules and regulations of the Department of Environmental Resources will result in suspension or revocation of this permit or prosecution under Section 9 of the Air Pollution Control Act.

Issued May 11, 1988
Expires 05/31/93

N. Rao Kona
N. RAO KONA
Regional Air Pollution Control Engineer

Central Office
Norristown Regional Office



Operating Permit Conditions
Application No. 09-313-056
M G Industries

Conditions (continued):

- (3) The control devices covered under this Operating Permit consist of 10 packed tower scrubbers followed by a PPS countercurrent scrubber.
- (4) The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- (5) The company shall immediately notify the Department of any malfunction of the source(s) or associated air cleaning device(s) which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources.
- (6) If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Resources, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.
- (7) The aforementioned source(s) may be operated and used only so long as any associated air pollution control devices are operated and maintained in accordance with the specifications set forth in the respective plan approval(s), and the application(s) submitted for said plan approval(s) (as approved by the Department), and in accordance with any conditions set forth herein.
- (8) M G Industries shall limit their production of arsine to 0.0485 ppm for a maximum of 13.3 hours per month.
- (9) M G Industries shall limit the production of total fluoride compounds to eight hours per day.
- (10) M G Industries shall do twice daily testing of the caustic and prescrubbers causting solution by titration with with hydrochloric acid and verified via pH. The scrubber solution must be changed with 10% aqueous NaOH solution when the solution reaches 1% NaOH.

Operating Permit Conditions
Application No. 09-313-056
M G Industries

Conditions (continued):

- (11) M G Industries must do a twice daily testing on the hydrochloric acid solution in the acid prescrubber performed by titration and verified via pH. The scrubber solution must be changed when the concentration reaches 1% HCl. The new solution shall be 10% aqueous HCl.
- (12) M G Industries must do a daily testing of the $KMnO_4$ solution in the potassium permanganate scrubber solution. When the permanganate solution reaches 4%, more $KMnO_4$ will be added to raise the concentration to 7%. The MnO_2 formed during the scrubber operation shall be filtered out. When the pressure drop over the filter reaches 5 psi the solution and filter shall be changed.
- (13) M G Industries must keep records of all data and maintenance checks required by conditions 7 through 11 and make these records available to the Department on request.

(AQPC)