

DOCKET NO. 40-6940

From: <timothy_knapp@cabot-corp.com>
To: "Elaine Brummett" <ESB@nrc.gov>
Date: 7/17/03 10:37AM
Subject: Paragraph on Air Compliance

As requested, below is a description of CSM's Air compliance requirements and history.+++++

Cabot Supermetals (CSM) Boyertown is classified as a major facility for air pollutants under the Clean Air Act Amendments (CAAA). As such, CSM was required to obtain a Title V Air Operating Permit, which became effective on February 1, 2002. This permit allows CSM to operate its sources and establishes record keeping, monitoring, and reporting requirements along with meeting certain emission limits. Since issuance of the permit, CSM has deviated from five conditions out of 78 conditions listed over the past 1 ½ years of operating under the permit. The deviations reported were for visible emissions, monitoring and record keeping, VOC emission limit, and an exceedance in scrubber limit. All deviations were immediately corrected to prevent the likelihood of re-occurrence.

In addition to CSM being subject to Title V of the CAAA, the facility is subject to Title VI (Stratospheric Ozone) and Title III of the CAAA (Risk Management Program). CSM uses various Class II Ozone Depleting Substances (ODS) onsite. CSM is in compliance with the requirements under Title VI. Title III of the CAAA required CSM to Implement a Risk Management Program to prevent/reduce the release of a listed RMP chemical. Requires include a preventative program, hazard assessment, emergency response program, record keeping requirements, an audit program, and submission of an RMP Plan. CSM is in compliance with the requirements under Title III.

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