

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Interim Director

02/03/2014

B&W Conversion Services, LLC  
Attn: George E. Dials, President & Project Mgr  
1020 Monarch Street, Ste 300  
Lexington, KY 40513

RE: Findings and Orders  
NPDES  
Pike County  
NPDES Permit OIS00034

Transmitted herewith is one copy of the Director's Final Findings and Orders in the referenced matter.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel", which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
17th Floor, 77 South High Street  
Columbus, OH 43215

A handwritten signature in black ink that reads "Ed Swindall". The signature is written in a cursive, flowing style.

Ed Swindall, Supervisor  
Permit Processing Unit  
Division of Surface Water

ERS/EN  
Certified Mail

cc: Jennifer Witte, DSW/SEDO  
Eric Nygaard, DSW/CO  
Permit File (OIS00034)  
Journal Room

Date Issued: February 3, 2014  
Date Effective: February 3, 2014

OHIO E.P.A.  
FEB -3 2014

BEFORE THE ~~THE~~ DIRECTOR'S JOURNAL  
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of: B & W Conversion Services, LLC : Director's Final Findings  
Cooling Water Additive Request : and Orders

Pursuant to the Ohio Revised Code Section 6111.03(H)(4), the Director of the Ohio Environmental Protection Agency (Ohio EPA) hereby makes the following Findings and issues the following Orders:

FINDINGS

1. B & W Conversion Services, LLC, owns and is constructing a uranium hexafluoride processing facility, hereinafter referred to as B & W, located at 3090 US Route 23 Perimeter Road, Piketon, Ohio.
2. B & W currently holds an NPDES permit (No. 0IS00034, OH135241) for the discharge of wastewater to West Ditch.
3. Part II, Other Requirements, D. of the aforementioned NPDES permit requires that, "In the event that the permittee's operation shall require the use of cooling or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the director of the Ohio EPA prior to use. Discharges of these additives must meet Ohio Water Quality Standards and shall not be harmful or inimical to aquatic life ....."
4. On January 7, 2014, B & W applied to the Ohio EPA to receive written permission for the use of GE Spectrus BD1500 and Foamtrol AF3561 in the cooling water system that discharges to B & W outfall 0IS00034001 to control corrosion.
5. The proposed discharge concentrations of GE Spectrus BD1500 and Foamtrol AF3561 contained in the final effluent are 22.5 mg/l and 11.25 mg/l, respectively.
6. The static acute bioassay information contained in B & W's January 7, 2014 application adequately demonstrates that the proposed discharge concentrations for the GE Spectrus BD1500 and Foamtrol AF3561 of 22.5 mg/l and 11.25 mg/l, respectively should not be harmful or inimical to aquatic life, as determined by the procedures in OAC Rules 3745-1-36 and OAC Chapter 3745-2.

I certify this to be a true and accurate copy of the  
official documents as filed in the records of the Ohio  
Environmental Protection Agency.

By:  Date: 2-3-14

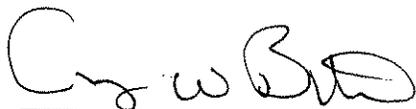
7. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of Chapter 6111 of the Revised Code.

### ORDERS

1. The proposed use of the GE Spectrus BD1500 and Foamtrol AF3561 at B & W is approved and is subject to compliance with all applicable laws, rules, regulations, standards, and the conditions contained herein.
2. In order to make an alternative proposal, or if additional cooling water additives are needed, a separate request must be submitted to the Ohio EPA, Division of Surface Water, Permit and Compliance Section, Industrial Permits Unit.
3. The cooling water additive treatment program may only be applied in accordance with the proposal approved by the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved proposal without the express, written approval of the Agency. Any deviation from the proposal or the above conditions may lead to revocation of these Findings and Orders and/or other sanctions and penalties provided under Ohio law. Approval of this proposal does not constitute an assurance that the cooling water additive treatment program will operate in compliance with all Ohio laws and regulations. Additionally, the terms and conditions of this approval do not relieve a permitted facility from complying with all monitoring requirements and effluent limitations that have been established in its NPDES permit.

### IT IS SO ORDERED:

Ohio Environmental Protection Agency



Craig W. Butler  
Interim Director

1/28/14  
Date