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G-000-104.7

**PERMIT TO INSTALL HAMILTON COUNTY  
APPLICATION NO. 14-1963 NESHAPS**

**06/12/91**

**OEPA/DOE-FMPC**

**9**

**LETTER**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
FAX (614) 644-2329

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George V. Voinovich  
Governor

Re: Permit to Install  
Hamilton County  
Application No: 14-1963  
NESHAPS

CERTIFIED MAIL

June 12, 1991

US DEPT OF ENERGY-FEED MATERIALS PROD  
BEHRAM SHROFF  
P.O. BOX 398705  
CINCINNATI, OH 45239

You are hereby notified that the Ohio Environmental Protection Agency has made a preliminary staff determination recommending that the Director issue a Permit to Install for the source(s) shown on the enclosed draft permit. This preliminary determination is not an authorization to begin construction or modification of your source(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the source(s) will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to: Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A permit to install may be issued in proposed or final form based on the preliminary determination, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting.

Upon issuance of a final permit to install a fee of \$585 will be due. Please do not submit any payment now.

If you have any questions about this draft permit, please contact the field office where you submitted your application, or Clara Dailey, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations & Permit Section  
Division of Air Pollution Control

cc: US EPA  
SW OHIO AIR POLLUTION CONTROL AGENCY  
Ohio-Kentucky-Indiana Regional Council of Govts  
Kentucky Dept of Natural Resources & Env. Protection  
Indiana Office of Air Management  
US DOE-ENVIRONMENTAL COMPLIANCE SECTION

Date Rec'd JUN 17 1991  
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## Permit to Install Terms and Conditions

Application No. 14-1963  
APS Premise No. 1431110128  
Permit Fee:

Name of Facility: US DEPT OF ENERGY-FEED MATERIALS PROD

Person to Contact: BEHRAM SHROFF

Address: P.O. BOX 398705  
CINCINNATI, OH 45239

Location of proposed source(s): 7400 WILLEY ROAD  
FERNALD, OHIO

Description of proposed source(s):  
CRUSHER SYSTEM CONTROLLED BY FULL ENCLOSURE VENTED TO CARTRI  
DGE, MEPA, AND HEPA FILTERS.

Date of Issuance:

Effective Date:

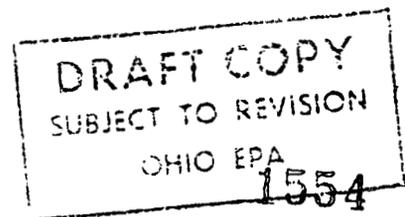
The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

\_\_\_\_\_  
Director

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months, if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a \$15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for US DEPT OF ENERGY-FEED MATERIALS PROD located in Hamilton County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

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<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control &amp; Usage Requirements</u>
P265	Plant 8 Crusher System With Cartridge, MEPA and HEPA Filters	A Totally Enclosed Crushing and Drumming System With All Emissions Vented To a Cartridge Filter (99% Control Efficiency), followed by a MEPA Filter (90% Control Efficiency) and a HEPA Filter (99.97% Control Efficiency).	3745-31-05 3745-15-07 3745-17-07 3745-17-11 40 CFR Part 61, Subpart H, 40 CFR Part 117, 40 CFR Part 302	$2.56 \times 10^{-6}$ lbs Particulate Per Hr $1.924 \times 10^{-6}$ lbs Uranium per Hour. Visible Emissions Limited to 0% Opacity From the Stack

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
TSP=PM <sub>10</sub>	$1.1235 \times 10^{-5}$
Uranium	$8.428 \times 10^{-6}$

**RADIONUCLIDES NESHP REQUIREMENTS**

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source No.</u>	<u>Source Description</u>	<u>NESHAP Regulation</u>
P265	Plant 8 Crusher System W/Cart., MEPA & HEPA Filters	Subpart H

The application and enforcement of these standards are performed by the United States Environmental Protection Agency.

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Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

1. Date of commencement of construction (no later than 30 days after such date);
2. Anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
3. Actual date of initial start-up (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

United States Environmental Protection Agency  
David Kee  
Air & Radiation Branch (5AR-26)  
230 South Dearborn Street  
Chicago, IL 60604

and Ohio Environmental Protection Agency  
Division of Air Pollution Control  
Authorization and Compliance Unit  
P.O. Box 1049  
Columbus, OH 43266-0149

and

Southwestern Ohio Air Pollution Control Agency  
1632 Central Parkway  
Cincinnati, OH 45214

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the SW Ohio Air Pollution Control Agency, 1632 Central Parkway, Cincinnati, Ohio 45210.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance test conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The maximum process weight rate for the Plant 8 Crusher System shall not exceed three (3) tons per hour.
2. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal operating hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the Federal Comprehensive Environmental Response, Compensation and Liability Act/Superfund Amendments and Reauthorization Act.)
3. All radionuclide monitoring, testing and reporting shall be performed in accordance with the procedures specified in Sections 61.93 and 61.94 of 40 CFR, Part 61, Subpart H. Particulate testing shall be performed in accordance with OAC Rule 3745-17-03 or through the use of an alternative testing procedure approved by the Ohio EPA.
  - a. A monitoring system designed to detect radionuclide activity, particulates and differential pressure shall be installed in exhaust stack 08-A159ASTK, downstream of all control devices. The monitoring system shall be operated and maintained in accordance with the procedures specified by the manufacturer. The monitoring system shall be operated continuously when emissions are exhausted through this stack.
  - b. The monitoring system shall have five (5) components: a single point isokinetic monitor between the cartridge and HEPA filters, a multiple point isokinetic stack sampler after the HEPA filter, a radiation monitor (Geiger-Mueller or equivalent) and differential pressure sensors and device(s) for recording the instantaneous radionuclide activity readings from the radiation monitor counter and for recording the differential pressure readings across the control device(s).
  - c. The recorder charts documenting the instantaneous differential pressure across the control device(s), and the instantaneous radionuclide activity readings, in addition to the laboratory results from the radionuclide and particulate emissions rate analyses shall be kept on-site, available for inspection by representatives of the Ohio EPA, for a minimum of five

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(5) years.

- d. The monitoring system shall be designed to sound an alarm and initiate a manual shutdown of the system(s) generating and emitting radionuclides through this stack when either the emitting radionuclides through this stack when either the radionuclide activity level, as indicated by the radiation monitor, exceeds a predetermined level approved by the Ohio EPA that ensures the health and safety of the public; or when the differential pressure across the control device(s), as indicated by the differential pressure sensors, fall below predetermined level(s) approved by the Ohio EPA that represents an abnormal condition such as a malfunction of the control device(s).

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