

**3331**

**PERMIT TO INSTALL  
HAMILTON COUNTY  
APPLICATION NO: 14-2288 NESHAP**

**05/28/92**

**OEPA/DOE-FN  
8  
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

LOG F-3356

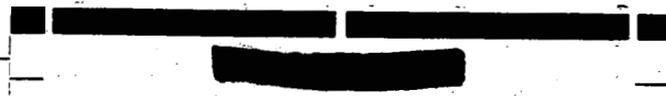
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George V. Voinovich  
Governor

Id R. Schregardus  
Director



Re: Permit to Install  
Hamilton County  
Application No: 14-2288  
NESHAP

CERTIFIED MAIL

May 28, 1992

US DEPT OF ENERGY-FERNALD ENVIR MGM PROJ  
BEHRAM SHROFF  
P.O. BOX 398704  
CINCINNATI, OH 45239

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 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. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
236 East Town Street, Room 300  
Columbus, Ohio 43215

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

## Permit to Install Terms and Conditions

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Application No. 14-2288  
APS Premise No. 1431110128  
Permit Fee: \$390.00

Name of Facility: US DEPT OF ENERGY-FERNALD ENVIR MGM PROJ

Person to Contact: BEHRAM SHROFF

Address: P.O. BOX 398704  
CINCINNATI, OH 45239

Location of proposed source(s): 7400 WILLEY RD  
CROSBY TWP, OHIO

Description of proposed source(s):  
TRASH COMPACTOR WITH CARTRIDGE AND HEPA FILTERS.

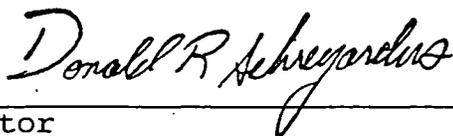
Date of Issuance: May 28, 1992

Effective Date: May 28, 1992

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

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-FERNALD ENVIR MGM PROJ 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.

<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>
P227	Trash Compactor	Cartridge Filtration Followed by HEPA Filtration (Overall 99.96% Efficiency)	3745-31-05 3745-15-07 3745-17-07 3745-17-11	6.0 x 10 <sup>-5</sup> lbs/hr PM (PM <sub>10</sub> ); 4.0 x 10 <sup>-5</sup> lbs/hr Uranium; No Visible PM Emissions

SUMMARY  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM/PM <sub>10</sub>	3.3 x 10 <sup>-4</sup>
Uranium	2.2 x 10 <sup>-4</sup>

RADIONUCLIDES NESHAP REQUIREMENTS

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

<u>Source No.</u>	<u>Source Description</u>
P227	Trash Compactor

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

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, Ohio 45210

#### 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.

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to SW Ohio Air Pollution Control Agency 1632 Central Parkway, Cincinnati, Ohio 45210.

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.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The maximum process rate for the trash compactor shall not exceed 1427 lbs/hr.
2. The use of a cartridge filter followed by HEPA filtration have a 99.96% overall control efficiency, satisfies Best Available Technology for this source.
3. All radionuclide monitoring, testing and reporting shall be performed in accordance with an alternative testing procedure approved by the Ohio EPA. 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. An area monitoring system designed to detect radionuclide activity and particulate shall be installed. 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.
  - b. The monitoring system shall have three components: a series of fixed head air sampling units, a counting system, and a system to verify the presence of radionuclides.
  - c. The laboratory results from the radionuclide and particulate emission rate shall be retained in the facility's files for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.
  - d. The Fernald Environmental Management Project shall provide the Southwestern Ohio Air Pollution Control Agency (SWOAPCA) with an annual report which includes the results of the monitoring as recorded by the Department of Energy's (DOE) Effluent Information System and the dose calculations required by 40 CFR 61.93(a). This report shall also contain a description of the emission controls and control efficiencies employed by this source, and a brief description of all modifications made to this source during the calendar year for which this report is prepared. This report shall be submitted to the SWOAPCA by June 30 of each year.

- e. If the results from sampling of the ambient air in the compactor area exceed 10% of  $2.0 \times 10^{-11}$  microcuries per cubic centimeter (the Derived Air Concentration for the isotope U-238), then standard operating procedure would require shutdown of operation until an evaluation can be made to determine the root cause of elevated airborne activities.
4. Visible emissions of particulates shall not exceed zero percent opacity from the discharge point of any control device associated with this source.
5. This facility shall maintain records documenting the hourly process rate for the trash compactor. These records, as well as any supporting computations, shall be retained in the facility's files for a period of not less than three years and shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.
6. The mass emissions from this source shall not exceed the following:  $6.0 \times 10^{-5}$  lbs/hr particulate ( $PM_{10}$ ); and  $4.0 \times 10^{-5}$  lbs/hr uranium.

**STATEMENT OF  
THE OHIO ENVIRONMENTAL PROTECTION AGENCY  
PERMIT TO INSTALL**

**APPLICATION NUMBER**

14-2288

**AMOUNT DUE**

\$390.00

**FACILITY NAME**

US DEPT OF ENERGY-FERNALD ENVIR MGM PROJ

**PURSUANT TO SEC.3745.11 OF THE OHIO REVISED  
CODE, FULL AMOUNT OF THIS PERMIT FEE IS DUE  
WITHIN FIFTEEN (15) DAYS OF THIS PERMIT.**

**MAKE CHECKS PAYABLE TO:****THE TREASURER OF THE STATE OF OHIO.**

**RETURN THE STATEMENT WITH YOUR REMITTANCE USING  
THE ENCLOSED ENVELOPE TO:**

**GENERAL ACCOUNTING  
OHIO EPA  
P.O. BOX 1049  
COLUMBUS, OH 43266-0149**

**ALL QUESTIONS REGARDING THIS FEE SHOULD INCLUDE  
THE APPLICATION NUMBER SHOWN ABOVE.**