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**RECOMMENDATION TO ISSUE PERMIT TO
INSTALL APPLICATION NO. 14-1801 (LARGE
DRUM SAMPLING STATION)**

09/07/89

OEPA/DOE-FMPC

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LETTER



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Original File Copy

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Richard F. Celeste
Governor

Re: Permit to Install
HAMILTON County
Application No. 14-1801
NESHAPS

SEPTEMBER 7, 1989

U.S. DEPT OF ENERGY, FEED MATERIALS PRODUCTION CENTER
P.O. BOX 398705
CINCINNATI, OHIO 45239

Attention: MARY STONE, PROJECT ENGINEER

Dear Sir:

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.

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 \$200.00 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 Section at (614) 481-4317.

Very truly yours,

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

Date Rec'd SEP 13 1989
Log C2608
File 5472 531
Library _____

cc: US EPA
SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY
OHIO-KENTUCKY-INDIANA REGIONAL COUNCIL OF GOVERNMENTS
INDIANA OFFICE OF AIR MANAGEMENT
KENTCUKY DEPT. NATL. RESOURCES & ENVIRONMENAL PROTECTION

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Permit to Install Terms and Conditions

Application No. 14-1801
APS Premise No. 1431110128
Permit Fee:

Name of Facility: U.S. DEPT OF ENERGY, FEED MATERIALS PRODUCTION CENTER

Person to Contact: MARY STONE, PROJECT ENGINEER

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

Location of proposed source(s): 7400 WILLEY RD, PLANT 1
CROSBY TWP, OHIO

Description of proposed source(s): LARGE DRUM SAMPLING STATION
CONTROLLED W/CARTRIDGE &
HEPAFILTERS.

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

EPA 3156

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Substantial construction for installation must take place within eighteen months of the effective date of this permit. This deadline may be extended by up to twelve 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.

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, examining records or reports pertaining to the construction, modification or installation of the above described source of environmental pollutants.

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.

The specified permit fee must be remitted within 15 days of the effective date of this permit to install.

The proposed source 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.

EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for U.S. DEPT OF ENERGY FEED MATERIALS PRODUCTION CENTER located in HAMILTON County. The sources listed below shall not exceed the emission limits/control requirements contained in the following table:

Ohio EPA Source #	Source Identification	BAT Determination	Applicable Ohio EPA Rule	Allowable Emissions (lb/hr, lb/MMBTU, gr/DSCF, etc.)
P258	Large Drum Sampling Station	Cartridge filtration (99% eff.) & HEPA filtration (99.9% eff.)	3745-17-11 (B) (1) 3745-17-07 3745-15-07 3745-31-05 (A) (3)	1.93 x 10 ⁻⁶ lb. Part./hr. 4.83 x 10 ⁷ Uranium/hr.; no visible particulate emissions

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SUMMARY
TOTAL NEW SOURCE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate (PM10)	8.45 x 10 ⁻⁶
Uranium	2.12 x 10 ⁻⁶

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P258	Large Drum Sampling Station	40 CFR Part 61, Subpart H

The requirements of 40 CFR Part 60 are federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 prior to such date);
3. Actual start-up date (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:

Ohio Environmental Protection Agency
Authorization and Compliance Unit
P.O. Box 1049
Columbus, Ohio 43266-0149

and SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY
2400 Beekman Street
Cincinnati, OH 45214



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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>	<u>NESHAP Regulation</u>
P258	Large Drum Sampling Station	40 CFR Part 61, Subpart H

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 S. Dearborn St.
Chicago, IL 60604

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

and SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY

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.

PERMIT TO OPERATE APPLICATION

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

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.

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 tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

MALFUNCTION/ABATEMENT

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.

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 SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY. 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 said equipment, must be accompanied by the shutdown of the associated air pollution sources.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. The maximum process rate for the Large Drum Sampling Station shall not exceed 60 pounds of samples taken per hour.
2. The use of a cartridge filtration system with a 99% control efficiency followed by a prefilter/HEPA filtration system with a 99.9% control efficiency, satisfied the Best Available Technology for this source.
3. A monitoring system designed to detect radionuclides, particulates and differential pressure shall be installed in exhaust stack EP1-001, 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 stack EP1-001.
 - a. The monitoring system shall have five (5) components: an isokinetic stack sampler, a RAD Monitor (Ludlum model 17 Rate meter or equivalent), differential pressure sensors and device(s) for recording the instantaneous radionuclide emission readings from the RAD Monitor and for recording the differential pressure readings across the control device(s).

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- b. Samples obtained by the monitoring system shall be collected [specify frequency; i.e., hourly, daily, weekly, etc.] for laboratory analysis to determine both the radionuclide and particulate emission rates from stack EPl-001. The analyses for radionuclides and particulates shall be performed using procedures approved by the Ohio EPA.
 - c. The recorder charts documenting the instantaneous differential pressure across the control device(s), and the instantaneous radionuclide emission readings, in addition to the laboratory results from the radionuclide and particulate emission rate analyses, shall be submitted to the SOUTHWESTERN OHIO AIR POLLUTION CONTROL AGENCY (SWOAPCA) on a quarterly basis, and copies of both the recorder charts and the laboratory analyses shall be kept on-site, available for inspection, for a minimum of two (2) years.
 - d. On an annual basis the Feed Material Production Center shall provide the SWOAPCA with an Environmental Monitoring Report. This annual report will be submitted by June 15 of each operational year.
 - e. The monitoring system shall sound an alarm and initiate a shutdown of the system(s) generating and emitting radionuclides through stack EPl-001 when either the radionuclide emission level, as indicated by the RAD Monitor, exceeds a predetermined level approved by the Ohio EPA that ensures the health and safety of the public; or the differential pressure across the control device(s), as indicated by the differential pressure sensors, falls below predetermined level(s) approved by the Ohio EPA that represent an abnormal condition such as a malfunction of the control device(s).
4. Visible emissions of particulates shall not exceed zero (0%) percent opacity from the discharge stack of any control device associated with this source.
 5. This facility shall maintain records documenting the hourly sampling rate of the drum station. These records, as well as any supporting computations, shall be retained in the company's files for a period of not less than two 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 shall not exceed the following limits:
1.93 x 10⁻⁶ pounds of particulate per hour and 4.83 x 10⁻⁷ pounds uranium per hour.

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