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Department of Energy

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JAN 05 2000

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V, SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0266-00

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

PROCESSING PIT MATERIAL THROUGH THE DRYER AND PERFORMANCE TESTING

In accordance with 40 CFR 61.13, within ninety days after startup of a new emission source, emissions testing must be performed. The Department of Energy (DOE) began processing pit material through the dryer facility on December 17, 1999; therefore, emissions testing must be performed by March 16, 2000.

As required by 40 CFR 61.13, the U.S. Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) must be notified at least thirty days before the performance test is to be conducted. To satisfy this requirement, DOE will provide the agencies, including the Hamilton County Department of Environmental Services (DOES), with a completed "Intent to Test Notification" form at least thirty days prior to testing. As documented in the Final Remedial Action (RA) Package, Response to Comments, the performance test will be conducted while the dryer is processing typical waste material expected to be processed by the dryer and will be conducted as documented in the Final Waste Pits Remedial Action Project (WPRAP) Remedial Action Package, Performance Test Criteria. The Intent to Test Notification Form that DOE submits shall identify the feed being processed by the dryer at that time.

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The intent of this testing is to verify that the system air emissions are consistent with the estimated potential emissions presented in Table 1-6 of the Point Source Emissions Data of the Remedial Design Package. If this testing is performed while the dryer is processing material which is not typical, and verification of estimated emissions is not feasible, additional testing may be required as documented in the OEPA Approval – OU1 Accelerated Excavation of Waste Pit 5 Letter, and agreed to in the Final RA Package Response to Comments. If/when any additional testing is required, DOE will follow the same notification procedure. If you have any questions regarding this matter, please contact Dave Lojek at (513) 648-3127.

Sincerely,

Johnny Reising

FEMP:Hall

Johnny W. Reising
Fernald Remedial Action
Project Manager

cc:
N. Hallein, EM-42/CLOV
J. Hall, OH/FEMP
D. Lojek, OH/FEMP
A. Tanner, OH/FEMP
G. Jablonowski, USEPA-V, SRF-5J
T. Schneider, OEPA – Dayton
L. Gruber, Hamilton County DOES
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra Tech
T. Hagen, FDF/65-2
J. Harmon, FDF/90
R. Heck, FDF/2
S. Hinnefeld, FDF/31
T. Walsh, FDF/65-2
AR Coordinator, FDF/78
ECDC, FDF/52-7

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INTENT TO TEST NOTIFICATION
(One Emissions Unit Per Sheet)

AGENCY USE ONLY
Date Received _____
Assigned _____ 2701

Proposed Test Date _____
Pre-Test Meeting Desired? Yes ☐ No ☐
Facility Premise No. _____
SCC Code _____

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A. Facility Information
Name _____ Address _____
Contact Person _____ Telephone Number _____

B. Testing Firm Information
Name _____ Address _____
Contact Person _____ Telephone Number _____

C. Test Plan and Emissions Unit Information Table: List the applicable information under each respective column heading.

Emissions Unit #	Control Equipment	Monitoring Equipment	Pollutant(s) to be Tested	EPA Test Method(s)	Filter Box Temperature	Number of Sampling Points	Total Time for Test Run	Number of Sampling Runs

Source is testing to comply with (check all that apply): ☐ State PTI ☐ State PTO ☐ Title V ☐ NSPS ☐ MACT ☐ BIF ☐ Title IV ☐ Other_____

D. What is the maximum rated capacity? _____
Will Emissions Unit be operated at the maximum capacity given in its permit-to-install or permit-to-operate? Yes ☐ No ☐ If no, attach explanation.
Specify how operating rate will be demonstrated during testing (*See notes 1, 2 and 3 on page 2.): _____
Are any modifications to USEPA Reference Method(s) proposed? Yes ☐ No ☐ If "no" is checked, then no modification, however minor, will be accepted.
If yes, explain proposed modification(s): _____

Sampling Location(s): Inlet ☐ Outlet ☐ Simultaneous ☐ Will Cyclonic flow check(s) be conducted? Yes ☐ No ☐
Fuel Sampling: Coal - Proximate ☐ Ultimate ☐ Other ☐ If other, specify: _____
Emission rate to be calculated using: F-Factor ☐ Ultimate Coal Analysis ☐ Other ☐ If other, specify: _____
Are concurrent Method 9 readings to be performed? Yes ☐ No ☐ Does the test method require audit samples? Yes ☐ No ☐

E. Sample Train Calibration: All affected measuring and monitoring equipment should be calibrated within 60 days of the scheduled testing.

THE FOLLOWING ADDITIONAL INFORMATION SHALL BE SUBMITTED AS ATTACHMENTS:

F. Sample Train Information:

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1. A schematic diagram of each sampling train.
2. The type or types of capture media to be used to collect each gas stream pollutant. (Include filter specification sheets)
3. Sample tube type, (e.g., glass, teflon, stainless steel, etc.)
4. Probe cleaning method and solvent to be used, if applicable.

G. Laboratory Analysis:

A description of the laboratory analysis methods to be used to determine the concentration of each pollutant.

H. Description of Operations:

A description of any operation, process, or activity that could vent exhaust gases to the test stack. This shall include the description and feed rate of all materials capable of producing pollutant emissions used in each separate operation.

Note 1: All testing shall be performed at maximum rate capacity as specified by the equipment manufacturer or at the maximum rate actually used in the emissions unit operation, whichever is greater, or at any other rate specified by the administrator.
Note 2: If the emissions unit is not operated at maximum capacity, or as close as possible thereto, the emissions unit might be derated to that production capacity.
Note 3: Production records and parametric monitoring records must be included in the final report.

I. Stack and Vent Description:

A dimensional sketch or sketches showing the plan and elevation view of the entire ducting and stack arrangement. The sketch should include the relative position of all processed or operations venting to the stack or vent to be tested. It should also include the position of the ports relative to the nearest upstream and downstream gas flow disturbance or duct dimensional change. The sketches should include the relative position, type, and manufacturer's claimed efficiency of all gas cleaning equipment.

A cross sectional dimensional sketch of the stack or duct at the sampling ports, showing the position of sampling points. In case of a rectangular duct, show division of duct into equal areas.

J. Safety:

Describe all possible safety hazards including such items as the presence of toxic fumes, high noise levels, areas where eye protection is required, etc. Note: Conditions considered unsafe at the time of the test will cause postponement.

K. Test Report:

The final test report must contain, as a minimum, the following information to be acceptable:

All raw data sheets, including strip charts where applicable
Process data
Results of audit samples
All lab analyses data
All calibration data
Complete chain-of-custody records for all samples removed from the facility for recovery and/or analysis
All formulas used in calculating emission rates if different than specified in the applicable reference method
An explanation of all disruptions encountered during the test period, (i.e., Meter box changes, process shutdowns, broken glassware, etc.)
Backhalf analysis if determining particulate emissions that are 10 microns in aerodynamic diameter or less

Note: In accordance with OAC 3745-15-04 the report must be submitted within 30 days of conducting the test.