



Department of Energy 4034



Ohio Field Office
Fernald Area Office
P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155

DEC 12 2001

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

DOE-0165-02

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

Dear Mr. Saric and Mr. Schneider:

**PERMIT INFORMATION SUMMARY FOR THE WASTE PITS REMEDIAL ACTION PROJECT
PUGMILL VENTILATION SYSTEM PROJECT**

The purpose of this letter is to provide the Permit Information Summary for the Waste Pits Remedial Action Project (WPRAP) Pugmill Ventilation System Project to the United States Environmental Protection Agency (USEPA) and the Ohio Environmental Protection Agency (OEPA). This project involves the installation of a ventilation/abatement system to control emissions of steam and fine particulate from the pugmill discharge bin. The discharge bin collects the dried solids from the WPRAP Dryer. Currently, steam, entrained with fine radiological particles, is visible from the pugmill bin entrance. These fugitive emissions are believed to be responsible for elevated airborne radiological levels in the WPRAP work area. The ventilation/abatement system is being installed to minimize the spread of radionuclide contamination from the pugmill discharge bin. This system will consist of the following: venturi/quench with sump and pumps, Wet Electrostatic Precipitator (WESP) with sump and pump, direct air reheater, parallel two stage High-Efficiency Particulate Air (HEPA) filtration systems, Induced-Draft (ID) fan, and stack with a continuous emissions monitoring system.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121(e)(1) states that no federal, state, or local permit shall be required for the portion of any removal or remedial action conducted entirely on-site, where such remedial action is selected and carried out in compliance with CERCLA Section 121. WPRAP is being completed in support of the remedial action to clean up the Department of Energy, Fernald Environmental Management Project (DOE-FEMP), which is being carried

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Mr. James A. Saric
Mr. Tom Schneider

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out in compliance with CERCLA Section 121. The Pugmill Ventilation System Project is being completed as part of this effort, therefore, federal, state, or local permits are not required. The project must, however, be conducted in accordance with the terms and conditions of those permits that otherwise would have been required.

Section XIII.B of the Amended Consent Agreement requires the DOE-FEMP to identify those permits that otherwise would be required along with the standards, requirements, criteria, or limitations that would have had to be met to obtain each permit. The DOE-FEMP must report these findings to the USEPA along with an explanation of how the response action will meet these standards, requirements, criteria, or limitations. The original WPRAP Remedial Design that was approved prior to the start of the cleanup of the waste pits contained the regulatory crosswalk for the WPRAP Dryer, Table 3-2a, "Substantive Permitting Requirements for Air Contaminant Sources." Table 3-2a will also serve as the regulatory crosswalk for the Pugmill Ventilation System Project. This project will have air emissions from a point source that consists of particulate and radionuclides. Regulations identified within the regulatory crosswalk pertaining to particulate and radionuclide emissions from a new point source will be applicable and will serve as the Permit Information Summary for the Pugmill Ventilation System Project.

If you have any questions regarding this transmittal please contact John Kappa at (513) 648-3149 or Dave Lojek at (513) 648-3127.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Kappa

Enclosure: As Stated

Mr. James A. Saric
Mr. Tom Schneider

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cc w/enclosure:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
D. Lojek, OH/FEMP
B. Loaner, OEPA-Dayton
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Hodge, Tetra-Tech
~~AR-Coordinator, Fluor-Fernald, Inc./MS78~~

cc w/o enclosure:

A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./MS2
M. Cherry, Fluor Fernald, Inc./MS52-1
D. Dalga, Fluor fernald, Inc./MS52-1
T. Hagen, Fluor Fernald, Inc./MS65-2
R. Houchins, Fluor Fernald, Inc./MS52-1
P. A. Shanks, Fluor Fernald, Inc./MS65-2
T. Walsh, Fluor Fernald, Inc./MS46
D. Zdelar-Bush, Fluor Fernald, Inc./MS52-1
ECDC, Fluor Fernald, Inc./MS52-7

TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Substantive Air Permits - Rotary Dryer				
<p>Particulate Matter Standards OAC 3745-17-07</p>	<p>Visible particulate emissions from any stack may exceed twenty percent opacity, as a six minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six minute average, at any time.</p>	<p>BAT shall mean that visible emissions of particulate shall not exceed zero (0%) percent opacity from the discharge stack of any control device associated with this source excluding water vapor.</p>	<p>Visible emissions of the particulate from the rotary dryer stack will not exceed 0 percent opacity through the use of HEPA filtration with differential pressure gauges and low differential pressure alarm.</p> <p>Fugitive dust emissions, primarily from excavation, hauling, and processing soils will be mitigated by the use of the following, as appropriate, when visible dust is present:</p> <ul style="list-style-type: none"> - Water or other dust suppression chemicals - Periodic application of water or other suitable dust suppressing chemicals is required on all dirt or gravel roads, parking lots, or other surfaces that can cause fugitive emissions. - Maintaining roadways in clean conditions - Covering open bodied vehicles when transporting materials likely to become airborne. <p>Reasonably available control measures shall include: use of water or other suitable dust suppression chemicals for the control of fugitive dust, conducting shredding and screening operations in a processing building, covering of open bodied vehicles when transporting materials likely to become airborne, appropriate maintenance of roadways and work areas to control dust and the visual monitoring for visible dust.</p> <p>For materials stored or exposed for extended periods, more stringent BAT controls will be applied, including application of PolyShell or other crusting agents, or by maintaining the waste surface in a moist condition thereby eliminating the potential for airborne emissions.</p>	<p>Description of the Operation and Processes Sections 2.4, 2.5, 2.6, 3.2, 3.3, and 3.4; Design Criteria and Assumptions Sections 2.4, 2.5, 2.6, and 3.1; Pre-Operational Environmental Control Plan Section 5.0</p>

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Substantive Air Permits - Rotary Dryer				
<p>National Emission Standards for Hazardous Air Pollutants (NESHAP) - 40 CFR Part 61, Subpart H - Emissions of Radionuclides Other Than Radon From DOE Facilities</p> <p>40 CFR 61.90 and 40 CFR 61.96(b)</p> <p>and</p> <p>40 CFR 61.92 (DOE 5400.5)</p> <p>and</p> <p>40 CFR 61.93(b)</p>	<p>An application for approval does not have to be filed for radionuclide sources if the effective dose equivalent caused by all emissions from the new construction or modification is less than 0.1 mrem per year.</p> <p>Radiological emissions (except radon-222 and radon-220) to the ambient air from DOE facilities shall not exceed those amounts that would cause any member of the public to receive an effective dose equivalent of 10 mrem in any one year.</p> <p>Continuous emission monitoring is required for stacks and vents that have the potential, under normal operating conditions, but without emission control release radionuclides in sufficient quantities to cause any member of the general public to receive an effective dose equivalent of 0.1 mrem/year or greater.</p>	<p>HEPA filtration is BAT for radionuclide emissions and shall be installed to minimize radiological emissions to the ambient air and the contribution to the effective dose equivalent to any member of the public from the dryer stack.</p> <p>If determined to be necessary, based on modeling of radionuclide emissions to the site boundary, a continuous stack monitor shall be operated when radionuclide emissions are exhausted through the stack. The monitoring system shall have an isokinetic sampler designed and built in accordance with 40 CFR 61.93. The sampler shall include a radiation monitor with a high radiation alarm.</p>	<p>HEPA filtration is BAT for radionuclide emissions and shall be installed to minimize radiological emissions to the ambient air and the contribution to the effective dose equivalent to any member of the public from the rotary dryer stack.</p> <p>Radon emission from the rotary dryer or other point sources will meet a stack limit based on a maximum allowable off-site impact of 0.5 pCi/L annual average.</p> <p>Air emissions data and design assumptions will be provided to FDF for incorporation into the site-wide air model for calculation of stack limits. An independent performance test firm shall be retained to verify BAT is being met for emissions. To confirm operation of the CEM, sampling will be done during the performance test using Method 114.</p> <p>The monitoring system shall have an isokinetic sampler design and built in accordance with 40 CFR 61.93. The sampler shall include a radiation monitor with a high radiation alarm.</p> <p>A continuous air monitoring system will be provided to monitor the rotary dryer process off-gas downstream of the HEPA filters. The continuous air monitoring system will have the capability to discriminate radon.</p>	<p>Description of the Operation and Processes Sections 2.4, 2.5, 2.6, 3.2, 3.3, 3.4 and 4.0; Design Criteria and Assumptions Sections 2.4, 2.5, 2.6, and 3.1</p>

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Substantive Air Permits - Rotary Dryer				
Radon Emissions 40 CFR 192, Subpart A	Radon emissions from the dryer or other point sources shall meet a stack limit based on a maximum allowable off-site impact of 0.5 pCi/l annual average for each point source. This limit is based on 40 CFR 192, Subpart A. Although this limit is not directly applicable to point sources, applying to the impact from restored sites and not sites under remediation, it is being identified as a relevant and appropriate limit. To calculate the stack limit for a point source, EPA-approved dispersion modeling shall be used.		Radon emissions from the rotary dryer or other point sources shall meet stack limits based on a maximum allowable off-site impact of 0.5 pCi/L annual average. Design data shall be provided to FDF for determination of the emissions limit using the FEMP site-wide model. A continuous air monitoring system will be provided to monitor the rotary dryer process off-gas downstream of the HEPA filters. The continuous air monitoring system will have the capability to discriminate radon.	Description of the Operation and Processes Sections 2.4, 2.5, 2.6, 3.2, 3.3, 3.4, and 4.0; Design Criteria and Assumptions Sections 2.4, 2.5, 2.6, and 3.1
Ohio EPA Air Toxics Policy	The current PTI regulations provide the Director of Ohio EPA with a mechanism to require the evaluation of toxic air contaminants from new sources. The Ohio EPA Air Toxics Policy provides a mechanism for calculating the Maximum Acceptable Ground-Level Concentration (MAGLC) for a toxic substance. This value at the site boundary will be modeled to the stack to determine a stack limit. All toxic compounds that will exceed the stack limit shall be controlled administratively or by BAT to lower emissions to below the calculated stack limit.	For toxic compound emissions that were calculated to exceed the established stack limit, administrative controls shall be implemented or emissions shall be controlled by implementing BAT for toxic emissions. BAT for toxic emissions shall be throughput/materials restrictions or carbon beds for organic, caustic scrubbers for acidic fumes, or condenser for organic and acidic fumes. Performance of these control measures will be verified through performance testing during initial operation.	Administrative controls will be implemented or emissions will be controlled by implementing BAT for toxic emissions that are calculated to exceed stack limits. BAT for toxic emissions will be throughput/materials restriction, carbon beds, or thermal oxidation for organic vapors, caustic addition for acidic fumes, and condensation for organic and acidic fumes. Performance of these control measures will be verified through performance testing during initial operation.	Description of the Operation and Processes Sections 2.5, 2.6, 3.3, 3.4, and 4.0; Design Criteria and Assumptions Sections 2.5, 2.6 and 3.1
Air Emission Standards for Process Vents 40 CFR 264.1030-264.1036	No regulations have been promulgated for process vents associated with thermal drying, however, 40 CFR 264.1030-1036 will be relevant and appropriate but not applicable to air emission standards for process vents associated with thermal drying.	To control organic emissions, BAT shall be implemented. BAT for organic emissions shall be either carbon beds or condensers or administrative controls.	Pressure relief disks or panels will be used on the process equipment as there is a potential for combustible atmospheres to exist during upset conditions. Inert gas blanketing will be used to minimize the potential for the development of combustible atmospheres. BAT for organic emissions will be condensation followed by carbon beds or thermal oxidation.	Description of the Operation and Processes Sections 2.5, 2.6, 3.3, and 3.4; Design Criteria and Assumptions Sections 2.5, 2.6 and 3.1

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Substantive Air Permits - Rotary Dryer				
Air Quality Standards 40 CFR 60.670 Subpart 000	Stack emissions from affected facilities shall not contain particulate matter in excess of 0.05 g/dscm; or exhibit greater than 7 percent opacity, unless the stack emissions are discharged from an affected facility using a wet scrubbing control device. These standards are relevant and appropriate since shredder and conveyor systems were identified in the Operable Unit 1 FS.	Shredder and conveyor systems will be enclosed with dust suppression system to meet this requirement. BAT for particulate radionuclides emissions shall be HEPA Filtration with differential pressure gauge and low differential pressure alarm to be installed on the dryer off-gas system.	Conveyor systems installed outdoors will be covered type with water spray dust suppression system to control airborne dust at the outfeed. Shredder and conveyor systems installed inside buildings need not be covered and will have water spray dust suppression systems to control airborne dust at the outfeed. A wet scrubbing system has been utilized. BAT for particulate radionuclides emissions shall be HEPA Filtration with differential pressure gauge and low differential pressure alarm to be installed on the rotary dryer off-gas system.	Description of the Operation and Processes Sections 2.4, 2.5, 2.6, 3.2, 3.3, and 3.4; Design Criteria and Assumptions Sections 2.4, 2.5, 2.6, and 3.1
Air Quality Standards OAC 3745-21-07(G)(2)	Emissions of photochemical reactive material from processes, including drying, not to exceed 40 lbs/day, with a peak of 8 lbs/hour.	BAT shall be implemented to control organic emissions. BAT for organic emissions shall be either administrative controls or installing carbon beds or a condenser.	BAT shall be implemented to control organic emissions. BAT for organic emissions on the rotary dryer shall be vapor condensation combined with carbon beds or thermal oxidation. BAT for other processes shall be application of administrative controls.	Description of the Operation and Processes Sections 2.5, 2.6, 3.3, and 3.4; Design Criteria and Assumptions Sections 2.5, 2.6, and 3.1.
Air Quality Standards OAC 3745-21-02(C) and OAC 3745-21-03(D)	This requirement covers ambient air quality standards, guidelines, and methods of ambient air quality measurements for non-methane hydrocarbons. Mean ambient concentration of non-methane hydrocarbons not to exceed 160 micrograms/cubic meters (0.24 ppm as carbon) between 6 and 9 a.m.; methods for determining ambient concentration of non-methane hydrocarbons.	During drying, hydrocarbon soil contaminants may be evolved with the steam. An uncontrolled release could lead to a violation of this standard. BAT shall be implemented to control non-methane hydrocarbon emissions. BAT to reduce non-methane hydrocarbon emissions shall be either administrative controls or installing carbon beds or a condenser. Compliance to this standard shall be demonstrated using EPA-approved air modeling.	BAT shall be implemented to control organic emissions. BAT for organic emissions on the rotary dryer shall be vapor condensation combined with carbon beds or thermal oxidation. BAT for other processes shall be application of administrative controls. Compliance to this standard shall be demonstrated using the FEMP site-wide air model based upon design assumptions and data from the performance test.	Description of the Operation and Processes Sections 2.5, 2.6, 3.3, 3.4, and 4.0; Design Criteria and Assumptions Sections 2.5, 2.6, and 3.1.
General Provisions on Air Pollution Control OAC 3745-15-07(A)	Emission of any substance into the air in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared a public nuisance. It shall be unlawful for any person to cause, permit, or maintain any such public nuisance.	Potential emissions from the dryer shall be evaluated during the design phase. Emissions shall be controlled using BAT either administratively or installing BAT control equipment.	Potential emissions from the rotary dryer will be evaluated during the design phase. Using the FDF site-wide dispersion model emissions will be controlled using BAT either administratively and/or installing BAT control equipment. Fugitive emissions will be controlled using BAT. See OAC 3745-17-07(B) and OAC 3745-17-8(B).	Description of the Operation and Processes Sections 2.4, 2.5, 2.6, 3.2, 3.3, 3.4 and 4.0; Design Criteria and Assumptions Sections 2.4, 2.5, 2.6, and 3.1

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Nitrogen Oxide Standards OAC 3745-23-06(B)	Except as otherwise provided in these regulations, all stationary nitrogen oxide emission sources shall minimize nitrogen oxide emission by use of the latest available control techniques and operating practices in accordance with best current technology.	To minimize nitrogen oxide emissions, the dryer shall be equipped with low NOx burners which is considered BAT for gas-fired burners.	To minimize nitrogen oxide emissions the rotary dryer will be equipped with low NOx burners which is considered BAT for gas burners.	Description of the Operation and Processes Sections 2.5 and 3.3; Design Criteria and Assumptions Section 2.5.

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Excavated Working Materials - Materials Being Excavated, Transported, Stored, or Blended				
Permits to Install New Sources of Emissions OAC 3745-31-05(A)	The director shall issue a permit to install if he determines that the installation or modification and operation of an air contaminant source will: <ul style="list-style-type: none"> • Not prevent or interfere with the attainment or maintenance of applicable ambient air quality standards; • Not result in a violation of any applicable air pollution control laws; and • Employ best available technology to control emissions. 	Permits to Install would be required for facilities such as a fueling station, rotary dryer, and gas furnace in absence of the CERCLA 121 (e) permitting exemption. These sources will be installed such that they do not interfere with the attainment or maintenance of any applicable air quality standards or cause a violation of applicable air control laws. BAT will be employed to control both point source and fugitive emissions associated with the project.	Permits to install would be required for the rotary dryer, natural gas furnace and fueling station(s), in the absence of the CERCLA 121(e) permitting exemption. Sources will be installed such that they do not interfere with the attainment or maintenance of any applicable air quality standards or cause a violation of applicable air control laws. BAT will be employed to control both point source and fugitive emissions associated with the project.	Description of the Operation and Processes Sections 2.1, 2.2, 2.3, 2.7, 3.1, and 3.5; Design Criteria and Assumptions Sections 2.1, 2.2, 2.3, 2.7, 3.1, and 7.3; Excavation Plan Section 5.0; Pre-Operational Environmental Control Plan Section 5.0.
Radon Emissions	Radon emissions from excavated working materials are intermittent fugitive sources and will be controlled by implementing BAT with no numerical emission rate limit. This policy is described in greater detail in Section J.4.2.2.3 of this Attachment.	BAT control for radon emissions from excavated working materials can be, but is not limited to, applying water or a dust suppressant over the residues, or work practices to minimize handling, disturbances or time exposed. For storage piles that will be stored for an extended period of time, more stringent BAT controls shall be implemented such as applying tarps or building a ventilated temporary structure with controls such as carbon beds.	BAT control for radon emissions from excavated working materials shall include, but not be limited to, applying water or a dust suppressant over the residues, or work practices to minimize handling, disturbances, or time exposed. For storage piles needed for an extended period of time, more stringent BAT controls shall be implemented such as applying polyshell or equal.	Description of the Operation and Processes Sections 2.1, 2.2, 2.3, and 3.1; Design Criteria and Assumptions Sections 2.1, 2.2, 2.3, and 3.1; Excavation Plan Section 5.0; Pre-Operational Environmental Control Plan Section 5.0.
General Provisions on Air Pollution Control OAC 3745-15-07 (A)	Emission of any substance into the air in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared a public nuisance. It shall be unlawful for any person to cause, permit, or maintain any such public nuisance.	Fugitive emissions shall be controlled using BAT. See OAC 3745-17-07(B) and OAC 3745-17-8 (B).	Fugitive emissions shall be controlled using BAT including, as is deemed necessary, the application PolyShell, a plastic and fly ash mixture, or equivalent material, to exposed pit surfaces to control dust and erosion and to minimize water run-on. Water or other dust suppressants will be applied as deemed necessary during operations.	Description of the Operation and Processes Sections 2.1, 2.2, 2.3, 2.7, 3.1, and 3.5; Design Criteria and Assumptions Sections 2.1, 2.2, 2.3, 2.7, 3.1, and 7.3 Excavation Plan Section 5.0; Pre-Operational Environmental Control Plan Section 5.0.

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Excavated Working Materials - Materials Being Excavated, Transported, Stored, or Blended				
<p>Particulate Matter Standards OAC 3745-17-07(B) and OAC 3745-17-8 (B)</p>	<p>Visible particulate emissions from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average except:</p> <p>a) There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.</p> <p>b) There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.</p> <p>c) There shall be no visible particulate emissions from any material storage piles except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.</p>	<p>No person shall cause or permit any fugitive dust source to be operated; or any materials to be handled, transported, or stored; or a building or its appurtenances or a road to be used, without taking or installing reasonably available control measures to prevent fugitive dust from becoming airborne. Such reasonably available control measures shall include, but not limited to, one or more of the following which are appropriate to minimize or eliminate visible particulate emissions of fugitive dust:</p> <p>1) The use of water or other suitable dust suppression chemicals for the control of fugitive dust from demolition of existing buildings or structures, construction operations, the grading of roads or clearing land;</p> <p>2) The periodic application of asphalt, water, or other suitable dust suppression chemicals on dirt or gravel roads and parking lots, and other surfaces which can cause emissions of fugitive dust; suitable coverings;</p> <p>3) The periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins, or other enclosed structures, or the use of canvas or other suitable coverings, for all materials stockpiles and stockpiling operations;</p> <p>4) The covering, at all times, of open bodied vehicles when transporting materials likely to become airborne;</p> <p>5) The paving of roadways and the maintaining of roadways in a clean condition. Fugitive sources can also be controlled through work practices such as minimize handling, disturbances, or time exposed to the residues.</p> <p>Note 1: The presence of visible dust indicates the need for implementation of the above, as applicable.</p> <p>Note 2: For contingency materials that will be stored for an extended period of time, more stringent BAT controls shall be implemented such as applying tarps or building a ventilated temporary structure with BAT controls such as HEPA filtration.</p>	<p>Fugitive dust emissions, primarily from excavation, hauling, and processing soils will be mitigated by the use of the following, as appropriate, when visible dust is present:</p> <ul style="list-style-type: none"> - Water or other dust suppression chemicals - Periodic application of water, or other suitable dust suppressing chemicals as required on all dirt or gravel roads, parking lots, or other surfaces that can cause fugitive emissions. - Maintaining roadways in clean conditions - Providing a structure for the waste feed and treated material storage areas with a passive ventilation system. - Covering at all times open bodied vehicles when transporting materials likely to become airborne. <p>Reasonably available control measures shall include, as is deemed necessary, the following: use of water or other suitable dust suppression chemicals for the control of fugitive dust, providing a structure for the shredding and screening operations, covering of open bodied vehicles when transporting materials likely to become airborne, appropriate maintenance of roadways and work areas to control dust and the visual monitoring for visible dust.</p> <p>For materials stored or exposed for extended periods, more stringent BAT controls will be applied, including application of PolyShell or equal.</p> <p>* It should be noted that this ARAR was identified in the OU1 ROD, and the discussion of the requirements of this ARAR is correctly represented in this table. However, it should also be noted that the project will comply with the Ohio EPA approved FEMP Site Wide Dust Control Policy.</p>	<p>Description of the Operation and Processes Sections 2.1, 2.2, 2.3 2.7, 3.1, and 3.5; Design Criteria and Assumptions Sections 2.1, 2.2, 2.3, 2.7, and 3.1; Excavation Plan Section 5.0; Pre-Operational Environmental Control Plan Section 5.0.</p>

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TABLE 3-2a. SUBSTANTIVE PERMITTING REQUIREMENTS FOR AIR CONTAMINANT SOURCES (CONTINUED)

Citation	Substantive Permitting Requirements	Requirements Assessment	Compliance Strategy	Index to Design
Waste Pits				
National Emission standards for Air Pollutants (NESHAP) - 40 CFR 61, Subpart Q - Emissions of Radon From Department of Energy Facilities	No source at a DOE facility shall emit more than 20 pCi/m ³ /sec of radon-222 as an average for the entire source, into the air. Source means any building, structure, pile, impoundment or area used for interim storage or disposal that is or contains waste material containing radium in sufficient concentration to emit radon-222 in excess of this standard prior to remedial action.		BAT control for radon emissions from the waste pits will include, but is not limited to, applying water or dust suppressant over the residues, or work practices to minimize handling, disturbances or time exposed.	Description of the Operation and Processes Sections 2.1, 2.2, 2.3, and 3.1; Design Criteria and Assumptions Sections 2.1, 2.2, 2.3, and 3.1; Excavation Plan Section 5.0; Pre-Operational Environmental Control Plan Section 5.0.

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