



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

September 12, 2007

Certified Mail No. 7102 0243 6844 0000 0304

Teresa L. Perkins, Director
Environmental Technical Support Division
U.S. Department of Energy, Idaho Operations Office
1955 Fremont Avenue, MS 1216
Idaho Falls, Idaho 83415-1216

RE: Facility ID No. 023-00001, Idaho National Laboratory (INL),
Idaho Nuclear Technology and Engineering Center (INTEC)
Final Permit Letter

Dear Ms. Perkins:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0076 to the U.S. Department of Energy, Idaho Operations Office (DOE-ID) for the COM-UTI-616 Air Compressor at INTEC located at the INL, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on May 3, 2007. This permit is effective immediately. This permit does not release INTEC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This permit to construct does not contravene any existing Tier I operating permit conditions, therefore the process or equipment may be operated in accordance with the permit to construct before the Tier I operating permit is issued. As you requested, the permit to construct will be incorporated into the Tier I operating permit at the time of renewal.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office, 900 Skyline, Suite B, Idaho Falls, Idaho 83402, Fax (208) 528-2695.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rensay Owen, Regional Air Quality Manager, at (208) 528-2650 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

DOE-ID and CWI
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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Robert Baldwin at (208) 373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with the first name "Mike" and last name "Simon" clearly distinguishable.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSREB\sd

Project No. P-2007.0076

Enclosures

HARD COPY TO FACILITY

en: Rensay Owen, Idaho Falls Regional Office
Robert Baldwin, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division

en-web: Laurie Kral, U.S. EPA Region 10

ec: Teresa L. Perkins, perkintl@id.doe.gov
Brent Rankin, Brent.Rankin@icp.doe.gov
Robyn McCollum, Robyn.McCollum@icp.doe.gov
Tim Safford, SAFFORT@ID.DOE.GOV

c: Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)
Reading File (Ltr Only)

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
INL	Idaho National Laboratory
km	kilometer
lb/hr	pound per hour
NO _x	nitrogen oxides
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0076

Permittee:	U.S. Department of Energy, Idaho Operations Office	Facility ID No. 023-00001
Location:	Scoville, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This is an initial PTC for the standby air compressor, COM-UTI-616, to operate 5,000 hours per any consecutive 12-calendar month period.

Regulated Sources

1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Standby air compressor, COM-UTI-616	None

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2. COM-UTI-616 AIR COMPRESSOR

2.1 Process Description

This permit is to allow the 460 horsepower COM-UTI-616 air compressor to have the ability to operate 5,000 hours per any consecutive 12-calendar month period. The operational hours of the compressor increased from the 150 hours per month (a permit exempt level of operational hours) to 5,000 hours per year. The operational limit of 5,000 hours maintains the NO_x emissions below the significant level of 40 tons of NO_x emissions per year.

2.2 Emissions Control Description

Table 2.1 COM-UTI-616 AIR COMPRESSOR

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Standby air compressor	None	Compressor stack

Emissions Limits

2.3 Emissions Limits

The NO_x emissions from the standby air compressor stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 COM-UTI-616AIR COMPRESSOR EMISSIONS LIMITS

Source Description	NO _x
	T/yr
Standby Air Compressor, COM-UTI-616	35.65

2.4 Opacity Limit

Emissions from the standby compressor stack, or any other stack, vent, or functionally equivalent opening associated with the standby compressor, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Sulfur content

In accordance with IDAPA 58.01.01.728, the permittee shall not sell, distribute, use or make available or use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 2 fuel oil- 0.5% by weight

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2.6 Operation Hours

The maximum operational hours of the standby air compressor, COM-UTI-616, shall not exceed 5,000 hours per any consecutive 12-calendar month period.

2.7 Hour Meter

The permittee shall install, maintain and operate a device that will be able to monitor the operational hours of the standby air compressor, COM-UTI-616.

Monitoring and Recordkeeping Requirements

2.8 Fuel Oil Sulfur Monitoring

The permittee shall maintain fuel oil supplier certification records that contain the following:

- A statement from the fuel oil supplier that the fuel oil complies with the specifications ASTM D 396-05, Grade No. 2, and;
- The sulfur content of the oil from which the shipment came (or of the shipment itself)

Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request in accordance with General Provision 7.

2.9 Operational Hours Monitoring

The permittee shall monitor and maintain the operational hours of the COM-UTI-616 compressor monthly and annually. The annual operational hours shall be determined by adding the monthly operational hours for the previous consecutive 12-calender month period.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;

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Facility ID No. 023-00001

Location: Scoville, Idaho

- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.