

Statement of Basis

**Permit to Construct No. P-2011.0109
Project No. 61188**

**U.S. Department of Energy and Idaho Treatment Group, LLC (ITG)/AMWTP
INL AMWTP TSA-RE
Idaho Falls, Idaho**

Facility ID No. 023-00001

Final

July 25, 2013
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Permit Writer

**The purpose of this Statement of Basis is to satisfy the requirements of
IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho,
for issuing air permits.**

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
AIRS	Aerometric Information Retrieval System
α LLW	alpha-low level waste
AMWTF	Advanced Mixed Waste Treatment Facility
AMWTP	Advanced Mixed Waste Treatment Project
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
DE	drum equivalents
DEQ	Department of Environmental Quality
DMS	data management system
DOE-ID	United States Department of Energy Idaho Operations Office
dscf	dry standard cubic feet
EDE	Effective Dose Equivalent
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FRP	fiberglass reinforced plywood
gph	gallons per hour
HAP	hazardous air pollutants
HEPA	high-efficiency particulate air
hr/yr	hours per year
HVAC	heating, ventilation, and air conditioning
ICE	Inner Contamination Enclosure
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
IDC	item description code
INL	Idaho National Laboratory
lb/hr	pounds per hour
lb/qtr	pound per quarter
MACT	Maximum Achievable Control Technology
m^3	cubic meters
$\mu\text{g}/m^3$	micrograms per cubic meter
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
MW	mixed waste
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PAH	polyaromatic hydrocarbons

PC	permit condition
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RCE	Retrieval Contamination Enclosure
RCRA	Resource Conservation and Recovery Act
ROW	radioactive only waste
Rules	Rules for the Control of Air Pollution in Idaho
RWMC	Radioactive Waste Management Complex
scf	standard cubic feet
SCL	significant contribution limits
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
TAP	toxic air pollutants
TRU	transuranic
TSA	Transuranic Storage Area
TSA-RE	Transuranic Storage Area - Retrieval Enclosure
VOC	volatile organic compounds
WC	waste category
WMF	Waste Management Facility

FACILITY INFORMATION

Description

The following description was provided in the permit application. The Advanced Mixed Waste Treatment Project (AMWTP) Transuranic Storage Area (TSA)-Retrieval Enclosure (TSA-RE), commonly known as Waste Management Facility (WMF)-636, is located at the Radioactive Waste Management Complex (RWMC) on the Idaho National Laboratory (INL). The TSA-RE is operated by a designated contractor under contract with the United States (U.S.) Department of Energy-Idaho Operations Office (DOE ID). Prior to the start of retrieval activities, the TSA-RE contained approximately 53,300 cubic meters (m³) of the 65,000 m³ of mixed waste (MW) to be processed at the AMWTP. As of August 2012, there remains approximately 6,200 m³ of waste to be retrieved from the TSA-RE.

The TSA-RE is a metal building that encloses three asphalt pads, which support primarily earthen-covered stacks of retrievably stored transuranic (TRU) and alpha-low level waste (αLLW). The waste may be MW or radioactive only waste (ROW). The three asphalt pads, known as TSA-1, TSA-2, and TSA-R are divided into cells.

Located on TSA-1 is the Retrieval Contamination Enclosure (RCE), which surrounds the remaining waste that is left to be retrieved from Cells 1, 2, and 3. The RCE, also contains an Inner Contamination Enclosure (ICE) (or similar structure), which may be used to provide additional controls when operationally advantageous. Located on TSA-R is a smaller soft-sided (or similar) contamination control enclosure referred to as the TSA-R CCE. Both the RCE/ICE and the TSA-R CCE may be used for the retrieval of severely degraded containers and/or treatment of wastes. This permit addresses only those activities conducted within the RCE/ICE and TSA-R CCE (e.g., treatment of waste, container handling). This application does not address activities (e.g., container storage) that occur outside the RCE/ICE and TSA-R CCE as these activities are covered under an air exemption in accordance with IDAPA 58.01.01.220 through .223.

The RCE/ICE and TSA-R CCE are used to store, characterize, and treat ROW and MW. Wastes currently in storage at the AMWTP, as well as newly-generated on-Site waste, may be moved to, stored, characterized, and treated in the RCE/ICE and the TSA-R CCE. The RCE/ICE and the TSA-R CCE house a number of activities, which include:

- Retrieval of containers with adequate integrity.
- Retrieval of containers that have deteriorated and/or breached integrity.
- Retrieval of containers/waste from containers.
- Receiving and storing on-Site waste.
- Examining waste through visual means.
- Radiological surveying of containers.
- Soil removal activities including sampling and analysis.
- Removal of plastic, tarp, wood and other miscellaneous materials from the waste stack.
- Treating liquids in containers by the addition of absorbent.
- Decanting of liquids from containers.
- Neutralization of liquids in a container.
- Repackaging of waste from one container into another container(s).
- Repackaging of waste from a degraded container in the waste stack into another container(s).
- Sizing of waste so the waste may meet size constraints for subsequent waste management activities.

Mobile Equipment Used for Waste Retrieval: During operations within the RCE/ICE and TSA-R CCE at the TSA-RE, several types of diesel-operated machinery will be utilized. The primary machines will be skid steer loaders (typically for soil removal operations) and telescopic boom forklifts (typically for waste container removal and handling operations). A yard crane and tugs will also be used for assistance in retrieval operations. Each diesel powered machine will be equipped with an in-line catalytic oxidizer/filter (although the use of these devices is not required by the permit because credit for these devices was not taken in the emission estimate calculations) for the purpose of reducing emissions from the combustion of the diesel fuel out the individual engine stacks. A single small diesel forklift will be operated within the TSA-R CCE for handling containers within the enclosure. The emissions from diesel engines operated within both the RCE/ICE and the TSA-R CCE will be exhausted via the ventilation system(s) out the RCE/ICE stack. The emissions from the mobile equipment used to complete the retrieval project is the primary source of NOx emissions from this facility. Therefore, for permitting purposes, the NOx limit for the mobile equipment only applies to retrieval operations within the RCE/ICE and TSA-R CCE. When the retrieval operations have been completed, the NOx emission limit and all corresponding permit conditions (i.e., monitoring and recordkeeping) no longer apply and may be disregarded from that point in time forward.

Schedule: Retrieval operations at the TSA-RE will normally take place during two 12-hr shifts per day, 330 days per year. However, to allow maximum operational flexibility, this permit application assumes that year-round continuous (24-hrs per day, 365 days per year [8760 hours per year]) operations occur when determining emission estimates for radionuclides and toxics. The duration of retrieval operations within the RCE/ICE and the TSA-R CCE is expected to be between 1 and 2 years, given the optimal retrieval rate. Treatment operations within the RCE/ICE and the TSA-R CCE are planned for the duration of the AMWTP project, which is anticipated to continue through 2015. This date may be delayed if DOE-ID extends the AMWTP.

RCE Structure: The RCE structure consists of three large tensioned-fabric walls (or similar) and modular steel walls with airlocks and other supporting rooms. The three fabric walls are located on the north, west, and south sides of the RCE. The fabric is suspended and tensioned through the use of structural steel. The east wall is a modular steel wall that separates the TSA-1 from TSA-2. The north and south walls extend from the asphalt surface of TSA-1 to the ceiling of the TSA-RE and are a combination of fabric and modular steel walls. The modular steel walls are used for the airlock, personnel areas, and the partition between TSA-1 and TSA-2 to the upper wall partition in order to isolate the RCE from TSA-2. Support rooms include equipment/personnel airlocks, a control room, operations support room(s) (e.g., radiological control, industrial health, industrial safety) and waste export airlocks

ICE Structure: Within the RCE, a mobile soft-sided contamination control system (or similar) known as an ICE is used for the control of contamination during treatment and/or retrieval when a third stage of HEPA filtration is desired for RCE operations. The ICE is a mobile system such that the ICE can be moved to a specific location within the RCE.

TSA-R CCE Structure: The TSA-R CCE is a soft-sided (or similar) enclosure located on TSA-R, between column lines 32-34. The TSA-R CCE is used for the control of contamination during the treatment and/or retrieval using three stages of HEPA filtration.

Ventilation System: An extensive ventilation system was originally installed for the TSA-RE as a whole, but it is of limited capacity. As described earlier, this document does not address operations (e.g., container storage) outside of RCE/ICE and TSA-R CCE operations and the equipment/activities associated with the RCE/ICE and TSA-R CCE. The ventilation system for the TSA-RE covers the areas outside of the RCE/ICE and TSA-R CCE and exhausts to a stack located on the east side of the TSA-RE.

A ventilation system specifically for the RCE/ICE (which also supports the TSA-R CCE) is utilized for operational activities within these units. Air handling units feed outside air into the RCE. The inlet air is heated for freeze protection of the RCE/ICE and to provide minimal heat for personnel comfort. Air from the operating area of the RCE is filtered by dual-stage high efficiency particulate air (HEPA) filters, which vent to a stack located on the west side of the TSA-RE. The ICE (or similar structure) is filtered by a single-stage HEPA filter, which vents directly into the RCE. The TSA-R CCE is filtered independently of the RCE/ICE through three stages of HEPA filtration, which discharge into the primary duct of the RCE/ICE stack. The RCE/ICE ventilation must be fully operating in order for activities to occur within the TSA-R CCE.

The emission sources from the RCE/ICE and the TSA-R CCE include exhaust from the equipment (e.g., telescopic boom forklifts, skid steer loaders, yard cranes, and tugs) and fugitive VOC emissions from breached containers potentially encountered during retrieval operations.

Ventilation for operations within the RCE/ICE occurs via an exhaust system. As described above, air from the RCE is filtered by dual-stage HEPA filters which are located on the south side of the RCE. The HEPA filtration system for the RCE is not located within the RCE in order to minimize contamination of the equipment. The RCE filtration system consists of three separate exhaust units, all of which have dual-stage HEPA filtration capabilities. Under normal operating conditions, two of the exhaust units are utilized. The third exhaust unit is provided for backup in the event that one of the other exhaust units is taken out of service. All RCE HEPA filter systems exhaust through the RCE/ICE stack. Ventilation for the mobile ICE system (or similar structure) is filtered by a single-stage HEPA exhaust system. This exhaust system is portable as the ICE is a mobile system, and the system vents directly into the RCE operating area.

Portable ventilation units serve the TSA-R CCE. They are rated at up to 6,000 CFM and have 3-stages of HEPA filtration. Any airflow out of the enclosure is filtered to remove particulate matter (PM) prior to discharge into the RCE ventilation duct. This connection occurs upstream of at least one point of discharge for the RCE mechanical system to ensure adequate mixing of the effluent. The TSA-R CCE portable ventilation units are equipped with ventilation discharge dampers, which close automatically when the unit is not in operation. This prevents backflow of RCE exhaust into the portable units.

For additional details regarding the current configuration of this facility, refer to the detailed description provided in the permit application.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

July 31, 2013	P-2011.0109, PROJ 61188, Modify permit to add TSA-R CCE, Permit Status (A)
September 19, 2011	P-2011.0109, Modify TSA-RE permit to include only the RCE/ICE, Permit status (S)
August 29, 2006	P-060512, TSA-RE, Permit status (S)
December 19, 2003	P-060512, TSA-RE, Permit status (S)
January 27, 2003	PTC No. 023-00001, TSA-RE, Permit status (S)
July 12, 2002	PTC No. 023-00001, TSA-RE, Permit status (S)
May 10, 2002	PTC No. 023-00001, TSA-RE, Permit status (S)
June 4, 2001	PTC No. 023-00001, both the TSA-RE PTC and the generator PTC, Permit status (S)
October 13, 2000	PTC No. 023-00001, TSA-RE, Permit status (S)
March 27, 2000	PTC No. 023-00001, TSA-RE, Permit status (S)
January 10, 1997	PTC No. 023-00001, TSA-RE, Permit status (S)
November 30, 1994	PTC No. 023-00001, TSA-RE, Permit status (S)
August 17, 1994	PTC No. 023-00001, TSA-RE, Permit status (S)
December 12, 1990	PTC No. 023-00001, TSA-RE, Permit status (S)

Application Scope

This PTC is for a minor modification of the PTC for the TSA-RE located at the AMWTF at the INL. The purpose of this permit is to add a soft sided (or similar) Contamination Control Enclosure (CCE) located within the TSA-RE for waste retrieval and waste treatment operations. The CCE will be located in the TSA-R, and will be referred to as the TSA-R CCE. The TSA-R CCE is an addition to the already existing Retrieval Contamination Enclosure (RCE) and Inner Contamination Enclosure(s) (ICE) within the TSA-RE.

Application Chronology

- April 18, 2013 DEQ received an application and an application fee.
- April 23, 2013 - May 8, 2013 DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
- May 16, 2013 DEQ determined that the application was complete.
- July 3, 2013 DEQ made available the draft permit and statement of basis for peer and regional office review.
- July 10, 2013 DEQ made available the draft permit and statement of basis for applicant review.
- July 23, 2013 Comments on draft permit were received from the facility.
- July 26, 2013 DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

Source Description	Control Equipment Description	Emissions Point
Vehicle and Retrieval Operations inside the RCE/ICE and TSA-R CCE at the TSA-RE; Includes but not limited to excavators, skid loaders, conveyors (if used), dump trucks and trailers	Reasonable control of fugitive dust (e.g., water or surfactant spray; shrouds; portable HEPA-filtered vacuums; access controls; use of radiological control areas; HEPA-filtered tents; operational, radiological and hazardous material control procedures; etc.)	RCE/ICE and TSA-R CCE Stack
TSA-RE Standby Generator, diesel-fired Caterpillar Model 3412, 500 kW output	Good combustion control	Generator stack
Propane-Fired Heaters (one unit rated at 150,000 Btu/hr & one unit rated at 75,000 Btu/hr)	Good combustion control	Heater stacks
Propane-Fired Make-up Air Units (three units rated at 1.2 Million Btu/hr each)	Good combustion control	Heater stacks

Emissions Inventories

An emission inventory was developed by the applicant for this modification to the TSA-RE PTC (see Section 4 of the permit application, dated April 2, 2013). DEQ reviewed the estimated emissions information and concurs that the estimates are consistent with DEQ methods and procedures for estimating emissions. Emissions estimates were based on emission factors from AP-42 and process information specific to the facility for this proposed project. Summaries of the estimated controlled emissions of criteria pollutants, TAPs, and HAPs from the facility are provided in the following tables.

Pre-Project Potential to Emit (PTE)

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the TSA-RE as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀ T/yr ^{a, b}	SO ₂ T/yr ^{a, b}	NO _x T/yr ^{a, b}	CO T/yr ^{a, b}	VOC T/yr ^{a, b}
Retrieval equipment engine exhaust	0.896	4.64	33.4	5.46	1.82
Building heaters	0.0254	0.137	0.334	0.281	0.0184
RCE/ICE emissions	0.00	0.00	0.00	0.00	0.0119
Pre-Project Totals	0.921	4.78	33.7	5.74	1.85

- a) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
 b) The pre-project is the same as the PTE presented in the Statement of Basis for PTC No. P-2011.0109, issued September 19, 2011.

Post Project Potential to Emit

The following table presents the post project potential to emit for criteria pollutants from the modified TSA-RE as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 3 POST-PROJECT POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀ T/yr ^a	SO ₂ T/yr ^a	NO _x T/yr ^a	CO T/yr ^a	VOC T/yr ^a
Retrieval equipment engine exhaust ^b	0.896	4.64	33.4	5.46	1.82
Building heaters	0.0254	0.137	0.334	0.281	0.0184
Retrieval, treatment, and non-contaminated soil removal	0.00	0.00	0.00	0.00	0.028
Post-Project Totals	0.921	4.78	33.7	5.74	1.87

- a) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
 b) The annual NO_x emissions limit in the permit is unchanged and this limit inherently limits PTE for other pollutants also. Therefore, the PTE for this source is the same as estimated for the previous permit and there is no increase (i.e., from equipment exhaust).

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required or if emissions modeling may be required, and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the change in the potential to emit for criteria pollutants for this project.

Table 4 CHANGES IN POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀ T/yr	SO ₂ T/yr	NO _x T/yr	CO T/yr	VOC T/yr
Pre-Project Potential to Emit	0.921	4.78	33.7	5.74	1.85
Post Project Potential to Emit	0.921	4.78	33.7	5.74	1.87
Changes in Potential to Emit	0.00	0.00	0.00	0.00	0.028
Post-Project Totals	0.00	0.00	0.00	0.00	+0.02

TAP Emissions

The waste remaining to be retrieved from the TSA-RE is listed in Table D1 in Appendix D of the application. For this remaining waste, a conservative analysis was performed, as done for the previous permit, to determine emissions from the facility as modified by this permitting action. Details of pound per hour TAP emission estimates are shown in Tables 4-10 and 4-11 of the permit application. For operations to be conducted under this permit for the remaining wastes in the TSA-RE, it is noted that the none of the modeled concentrations for any of these remaining TAPs exceeds 3 percent of the corresponding acceptable ambient concentration (AAC) for noncarcinogens or the acceptable ambient concentrations for carcinogens (AACC), and most are lower than 3 percent.

Ambient Air Quality Impact Analyses

The ambient air impact analyses presented in the permit application demonstrated to DEQ's satisfaction that emissions from proposed operations to add the TSA-R CCE to TSA-RE will not cause or significantly contribute to a violation of any air quality standard.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Butte County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201

Permit to Construct Required

The permittee has requested that a modified PTC be issued to the facility for changes to operations conducted in the TSA-RE. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625

Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by complying with the corresponding periodic monitoring/inspection and recordkeeping requirements specified in the INL Tier I operating permit.

Standards for New Sources (IDAPA 58.01.01.676)

IDAPA 58.01.01.676

Standards for New Sources

The RCE/ICE propane-fired heaters and air-makeup units are classified as fuel burning equipment. However, all of these units are rated at less than 10 MMBtu/hr in size, therefore, the rules under Sections 676-677 do not apply to these sources.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

The INL is classified as a major facility under the Title V permit program and the facility has been issued a Tier I operating permit for this purpose. To change the Tier I permit to incorporate the changes made to the PTC, the procedure under section 209.05.a applies. Under section 209.05.a, the owner or operator may operate the source after this PTC is issued because compliance with the revised PTC will not violate any terms or conditions of the existing Tier I permit and Section 380.02 will be complied with. Also, the changes in this PTC may be incorporated into the Tier I permit during the next renewal. If the permittee would like the Tier I to be changed before then, a minor permit modification may be requested per Section 383. This Tier I modification meets the minor modification criteria under Section 383.01.b.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The PTE for the entire TSA-RE RCE/ICE and TSA-R CCE is less than the significance levels, therefore, it is not possible for the increase in emissions resulting from this permit modification to cause an exceedance of any PSD significance threshold. PSD requirements do not apply to this permit modification.

NSPS Applicability (40 CFR 60)

This permit modification to add the RCE/ICE is not subject to any NSPS requirements.

NESHAP Applicability (40 CFR 61)

This facility is subject to the requirements of 40 CFR 61 Subpart H, National Emission Standards for Emissions of Radionuclides other than Radon from Department of Energy Facilities. In addition, under 40 CFR 61.93 the TSA-RE is subject to the requirements for continuous stack monitoring for the RCE/ICE exhaust stack. As part of today's PTC modification, this monitoring shall now also include monitoring of emissions from the TSA-R CCE. Regarding Subpart H, EPA has retained authority to administer this subpart and has not delegated this authority to DEQ, therefore, any approvals or interpretations of this regulation will be managed by EPA. Review of the permit application indicates this PTC modification to add the TSA-R CCE within the TSA-RE does not trigger the requirement to apply for an "approval to construct" from the EPA in accordance with 40 CFR 61.96 since the effective dose equivalent, caused by all emissions from the new construction or modification, is less than 1% of the standard prescribed in 40 CFR 61.92. The Tier I permit already contains site-wide requirements to meet the NESAPS regulations under 40 CFR 61 Subpart H. Similar permit conditions are included in this permit also.

MACT Applicability (40 CFR 63)

The application refers to existing diesel-fired internal combustion engines at the TSA-RE (Table 4-2): a standby generator and a high pressure breathing air unit. The applicability of Subpart ZZZZ is being addressed on a site-wide basis for all INL engines in the INL Tier I operating permit. For details regarding applicability of Subpart ZZZZ for the engines located at the TSA-RE RCE/ICE, refer to the Tier I permit.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Revised Permit Conditions 1, 4, 5, and 6

Descriptions of the facility were revised to add information about the TSA-R CCE as described in the permit application. The descriptions are "for information purposes only".

Revised Permit Conditions 8, 9, 12, 15, 17, 18, 19, 20, 21, and 24

The permit conditions were revised to indicate the requirements apply to the new TSA-R CCE in addition to the existing RCE and ICE.

Revised Permit Condition 11

Existing Permit Conditions 11 and 12 were revised and combined into a single permit condition to establish operating limits for waste retrieval and waste treatment operations. The operating limits are established for the purpose of assuring that actual operations remain consistent with the operations described in the permit application, and for which compliance with all applicable requirements has been demonstrated. The revised approach provides for more operational flexibility and the ability to use containment and at least one more stage of HEPA filtration when necessary to maintain production while keeping emissions within the levels for which compliance with applicable requirements has been demonstrated. Refer to Section 4.8 of the permit application for details.

New Permit Condition 16

A condition was added requiring the permittee to operate the RCE/ICE ventilation system while TSA-R CCE operations are occurring.

Revised Permit Conditions 17 and 18

The permit condition was revised to refer to tracking of "breached" drum equivalents retrieved per day, and to record data for the number of breached drum equivalents retrieved in areas with at least three stages of HEPA filtration inside the RCE/ICE or TSA-R CCE. This data is used to demonstrate compliance with the retrieval and treatment operating limits.

Revised Permit Condition 20

The Part 61 Subpart H NESHAP permit condition that requires continuous in-stack monitoring per 40 CFR 61.93 was revised to include emissions from the new TSA-R CCE in addition to the RCE and ICE. Refer to the Regulatory Analysis section above for details.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on July 23, 2013:

The following comments apply to the permit:

Facility Comment: Add TSA-R CCE to second line in table of contents, similar to the permit section title

DEQ Response: The table of contents was corrected.

Facility Comment: The third sentence of Permit Condition 1 reads as if the TSA-R CCE is an addition to the RCE and ICE and not the stand-alone CCE in the TSA-RE.

DEQ Response: The text was changed to show the TSA-R CCE is “in addition to” the existing RCE and ICE.

Facility Comment: The third sentence of Permit Condition 5 should read as follows: Additionally, located on Pad R in the TSA-RE, the soft-sided (or similar) Contamination Control Enclosure...

DEQ Response: The change was made.

Facility Comment: In the first sentence of Permit Condition 11 the phrase “of waste containers” also appears before the parenthetical and may be unnecessary duplicate words.

DEQ Response: The duplicated phrase was removed.

The following comments apply to the Statement of Basis:

Facility Comment: Throughout the document suggest that a dash be added to TSA RE and TSA 1, i.e., page 5, 1st paragraph, 4th and 5th sentence “TSA RE change to TSA-RE” and “TSA 1 change to TSA-1.”

DEQ Response: The changes were made as requested.

Facility Comment: On page 5, 1st paragraph, last sentence, it is stated that there remains approximately “200 m³” of waste. This should be “6,200 m³” of waste

DEQ Response: The change was made.

Facility Comment: On page 8, “Application Chronology”, it is assumed that the dates will be changed from 2011 to 2013 on the yet to be filled out dates?

DEQ Response: Yes, the dates have been updated.

Facility Comment: On page 8, Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION, should the first row of this table be the same as the first row in Table 2 in the draft permit; that is should it include the TSA-R CCE?

DEQ Response: Yes, the TSA-R CCE was added to Table 1.

APPENDIX B -- PROCESSING FEE

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: DOE-ID, ITG AMWTP
Address: PTC No. P-2011.0109 PROJ 81188
City: INL
State:
Zip Code:
Facility Contact:
Title: TSA-RE Permit Modification
AIRS No.: 023-00001

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPSA/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 1,000.00		

Comments:

