

IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY

**Air Quality Permit to Construct
State of Idaho Department of Environmental Quality
Transuranic Storage Area Retrieval Enclosure (TSA-RE),
Standby Generator, Issued December 19, 2003.**

IDAHO NATIONAL ENGINEERING AND
ENVIRONMENTAL LABORATORY
PERMIT NUMBER 023-00001

CONTROL COPY

ISSUED: December 19, 2003



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

RECEIVED

DEC 23 2003

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

December 19, 2003

Certified Mail No. 7099 3220 0009 1975 2591

Alan J. Dobson
General Manager
Advanced Mixed Waste Treatment Project
765 Lindsay Blvd.
Idaho Falls, ID 83402

RE: AIRS Facility No. 023-00001, DOE-ID/BNFL Inc., INEEL
Final Permit Letter

Dear Mr. Dobson:

On October 16, 2003 and November 5, 2003, the Idaho Department of Environmental Quality (DEQ) received letters from Bechtel BWXT Idaho, LLC (BBWI) and BNFL Inc. to transfer ownership of Permit to Construct (PTC) No. 023-00001, issued June 4, 2001, for the Radioactive Waste Management Complex, Transuranic Storage Area Retrieval Enclosure (TSA-RE) standby generator set. The change in ownership will be from BBWI to BNFL Inc.. Based on a review of this request, DEQ is issuing PTC No. P-030542 to the Department of Energy, Idaho Operations Office (DOE-ID) and BNFL Inc. for the TSA-RE generator in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit replaces PTC No. 023-00001, issued June 4, 2001, and is effective immediately. There were no other requested changes to this permit.

DEQ is not scheduling a meeting with BNFL Inc. or DOE-ID to discuss the terms and requirements of the permit because this permitting action has not affected any existing terms or requirements. However, if BNFL Inc. or DOE-ID would like to discuss the terms and requirements of this permit, please contact Rensay Owen of DEQ's Idaho Falls Regional Office at (208) 528-2650 to schedule a meeting. Should a meeting take place, DEQ recommends the following representatives attend the meeting: your plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions

This permit does not release DOE-ID or BNFL Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Alan J. Dobson
December 19, 2003
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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 call Mike Simon at (208) 373-0212 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Martin Bauer".

Martin Bauer
Administrator
Air Quality Division

MB/CZ/sd

Permit No. P-030542

Enclosures

cc: Sherry Davis, Air Quality Division
Rensay Owen, Idaho Falls Regional Office
Carole Zundel, Permit Writer
Mike Simon, Permit Coordinator
Marilyn Seymore, Air Quality Division
Pat Rayne, AFS
Laurie Kral, EPA Region 10
Stephanie Woolf, DOE-ID
Permit Binder
Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT NO.: P-030542

AIR FACILITY NO.: 023-00001

AQCR: 061

CLASS: A

SIC: 9999

ZONE: 12

UTM COORDINATE (km): 335.1, 4818.2

1. PERMITTEE

INEEL: Department of Energy-Idaho, BNFL Inc.

2. PROJECT

Transuranic Storage Area Retrieval Enclosure (TSA-RE), standby generator

3. MAILING ADDRESS

765 Lindsay Blvd.

CITY

Idaho Falls

STATE

ID

ZIP

83402

4. FACILITY CONTACT

Neil Brill

TITLE

Environmental Manager

TELEPHONE

(208) 557-7136

5. RESPONSIBLE OFFICIAL

Alan J. Dobson

TITLE

General Manager

TELEPHONE

(208) 557-7014

6. EXACT PLANT LOCATION

INEEL/RWMC/AMWTP/Transuranic storage area

COUNTY

Butte

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Mixed waste storage and treatment

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

**C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: December 19, 2003

Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030542

Permittee:	INEEL: DOE-ID, BNFL Inc.	AIRS Facility No.	Date Issued	December 19, 2003
Location:	765 Lindsay Blvd., Idaho	023-00001		

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

This PTC replaces PTC No. 023-00001, issued June 4, 2001, for the TSA-RE standby generator.

Regulated Sources

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

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Name: TSA Emergency Generator Manufacture: Caterpillar Model: 3412 Output: 500 kW Fuel: Diesel	None

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2. STANDBY GENERATOR

Emissions Limits

2.1 Opacity Limit

Emissions from the TSA-RE standby generator stack 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

2.2 Hours of Operation Limit

The maximum annual hours of operation of the standby generator shall not exceed 500 hours per any consecutive 12-month period.

2.3 Fuel Consumption Limit

The maximum hourly fuel consumption shall not exceed 40 gallons per hour.

Monitoring and Recordkeeping Requirements

2.4 Hours of Operation Monitoring

Each month, the permittee shall monitor and record the hours of operation of the standby generator for that month and for the most recent 12-month period. The most recent two years compilation of data shall be kept on site and shall be made available to DEQ representatives upon request.

Reporting Requirements

2.5 Certification of Documents

All documents submitted to DEQ, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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., and the permittee is subject to penalties for each day of noncompliance.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

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7. 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.
8. In accordance with IDAPA 58.01.01.123, 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.