



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
PIKE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 06-07666

Fac ID: 0666000050

DATE: 3/15/2005

Portsmouth Gaseous Diffusion Plant/Becht
Gilbert Drexel
PO Box 900
Piketon, OH 45661

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 3/15/2005
Effective Date: 3/15/2005**

FINAL PERMIT TO INSTALL 06-07666

Application Number: 06-07666
Facility ID: 0666000050
Permit Fee: **\$300**
Name of Facility: Portsmouth Gaseous Diffusion Plant/Becht
Person to Contact: Gilbert Drexel
Address: PO Box 900
Piketon, OH 45661

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3930 US Rt 23 S
Piketon, Ohio**

Description of proposed emissions unit(s):

X 701B in situ chemical oxidation with recirculation treatment system.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be 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. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Portsmouth Gaseous Diffusion Plant/Becht
 PTI Application: 06-07666
 Issued: 3/15/2005

Facility ID: 0666000050

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC Radionuclides	3.91
	Emissions of radionuclides to the ambient air from any buildings, structures and operations on the contiguous site shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent of 10 mrem/yr.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P475 - X-701B In Situ Chemical Oxidation with Recirculation Treatment System with carbon adsorber	OAC rule 3745-31-05(A)(3)	Emissions of Organic Compounds (OC) shall not exceed 0.85 lb/hr. Emissions of OC shall not exceed 3.71 TPY. The requirements of this rule include compliance with the requirements of 40 CFR Part 61, Subparts A & H. See A.2.a.
	OAC rule 3745-31-05(A)(2)(d)	See A.2.b and A.2.c.

2. Additional Terms and Conditions

- 2.a This facility is subject to be in compliance with all parts of 40 CFR 61, Subparts A and H, as applicable, with the understanding that these regulations are directly enforceable by USEPA.
- 2.b OAC rule 3745-31-05(A)(2)(d) provides that the director shall issue a permit on the basis that the new installation shall be in compliance with "National Emission Standards for Hazardous Air Pollutants" adopted by the administrator of the United States environmental protection agency pursuant to section 112 of the Clean Air Act and the regulations promulgated thereunder (including 40 CFR Part 61 and 40 CFR Part 63). Due to the information supplied by DOE and the cited rule, the permittee and any additional facility or organization entering into a contractual agreement with DOE for work at this site shall comply with all the requirements of 40 CFR Part 61, Subparts A and H.

- 2.c** The permittee shall submit to Ohio EPA a copy of the annual compliance report of the radionuclide emissions from all the emissions units at the facilities (DOE, USEC, & UDS) as submitted to U.S. EPA and required under 40 CFR Part 61, Subparts A and H.

All copies of reports required by or relating to 40 CFR Part 61, shall be sent to:

DAPC Supervisor
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138

Assistant Chief Permitting
Ohio Environmental Protection Agency
Division of Air Pollution Control
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43216-1049

Electronic reporting is an acceptable alternative to paper reporting with prior approval from Ohio EPA.

In those instances where the information requested in the annual report is classified, such information will be made available to the Ohio EPA Southeast District Office separate from the report, and will be handled and controlled according to applicable security and classification regulations and requirements.

- 2.d** The 0.85 lb OC/hr and 3.71 ton OC/yr limitations were established for PTI purposes to reflect the worst-case potential to emit for this emissions unit based on the groundwater data from the engineering report design submittal and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. The permittee shall operate the carbon adsorber system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P475 was evaluated based on the groundwater data from engineering report design submittal and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Trichloroethylene (TCE)

TLV (mg/m³): 269

Maximum Hourly Emission Rate (lbs/hr): 0.75

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 40.89

MAGLC (ug/m³): 6,405

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in groundwater data, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in groundwater data, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
3. The permittee shall maintain daily records that document any time periods when the carbon adsorber system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office, in writing, of any daily record showing that the carbon adsorber system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 45 days after the exceedance occurs.

E. Testing Requirements

1. Emission Limitation:

Emissions of Organic Compounds (OC) shall not exceed 0.85 lb/hr.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 25 or 25A.

2. Emission Limitation:

Emissions of OC shall not exceed 3.71 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission rate or the actual emission rate as required in Section E.1 by the maximum hours of operation (8,760), and dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T106 -X-701B Equalization Tank T-1, 3,800 gallon storage tank with submerged fill	OAC rule 3745-31-05(A)(3)	Emissions of OC shall not exceed 0.2 TPY. See A.2.e. The requirements of this rule include compliance with the requirements of 40 CFR Part 61, Subparts A & H. See A.2.a.
	OAC rule 3745-31-05(A)(2)(d)	See A.2.b and A.2.c.
	OAC rule 3745-21-09(L)	See A.2.d.

2. Additional Terms and Conditions

- 2.a This facility is subject to be in compliance with all parts of 40 CFR 61, Subparts A and H, as applicable, with the understanding that these regulations are directly enforceable by USEPA.
- 2.b OAC rule 3745-31-05(A)(2)(d) provides that the director shall issue a permit on the basis that the new installation shall be in compliance with "National Emission Standards for Hazardous Air Pollutants" adopted by the administrator of the United States environmental protection agency pursuant to section 112 of the Clean Air Act and the regulations promulgated thereunder (including 40 CFR Part 61 and 40 CFR Part 63). Due to the information supplied by DOE and the cited rule, the permittee and any additional facility or organization entering into a contractual agreement with DOE for work at this site shall comply with all the requirements of 40 CFR Part 61, Subparts A and H.

- 2.c** The permittee shall submit to Ohio EPA a copy of the annual compliance report of the radionuclide emissions from all the emissions units at the facilities (DOE, USEC, & UDS) as submitted to U.S. EPA and required under 40 CFR Part 61, Subparts A and H.

All copies of reports required by or relating to 40 CFR Part 61, shall be sent to:

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In those instances where the information requested in the annual report is classified, such information will be made available to the Ohio EPA Southeast District Office separate from the report, and will be handled and controlled according to applicable security and classification regulations and requirements.

- 2.d** In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.
- 2.e** The submerged fill pipe(s) are to be installed and operated so they are within six (6) inches of the bottom of the storage tank.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

Portsmouth Gaseous Diffusion Plant/Becht

PTI Application: 06 07666

Issued

Facility ID: 0666000050

Emissions Unit ID: T106

None.

D. Reporting Requirements

None.

E. Testing Requirements1. Emission Limitation:

Emissions of (OC) shall not exceed 0.2 TPY.

Compliance Method:

Compliance shall be determined by a one time calculation using the TANKS Program 4.0 or other method acceptable to the Ohio EPA Southeast District Office.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.