



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Curt Fransen, Director

August 30, 2013

Teresa Perkins, Director, Environmental and Sustainability Division
U.S. Department of Energy
1955 North Fremont Avenue
Idaho Falls, ID 83401

RE: Facility ID No. 023-00001, U.S. Department of Energy, Idaho National Laboratory, Idaho Falls
Final Permit Letter

Dear Ms. Perkins:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0023 Project 61181 to U.S. Department of Energy, Idaho National Laboratory (DOE-INL) for the distillation of sodium from wastes located at Idaho Falls. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received on April 4, 2013 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately. This permit does not release DOE-INL from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision 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 at 900 N. Skyline, Ste B, Idaho Falls, ID 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 Teri Tyler, Air Quality Analyst, at (208) 528-2650 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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.

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 Harbi Elshafei at (208) 373-0502 or harbi.elshafei@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\HE

Permit No. P-2013.0023 PROJ 61181

Enclosures

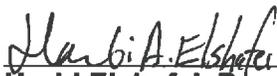
AIR QUALITY
PERMIT TO CONSTRUCT

Permittee U.S. Department of Energy – Idaho Operations
Permit Number P-2013.0023
Project ID 61181
Facility ID 023-00001
Facility Location Scoville, ID, Hwy. 20/26 between Arco and Idaho Falls, and Hwy.33
between Mud Lake and Arco
Scoville, ID 83401

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued August 30, 2013


Harbi Elshafei, Permit Writer


Mike Simon, Stationary Source Manager

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PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is the initial permit to construct for the distillation of sodium from wastes at the Idaho National Laboratory (INL), Idaho Nuclear Technology and Engineering Center (INTEC).
2. The emission sources regulated by this permit are listed in the following table.

Table 1. SUMMARY OF REGULATED SOURCES

Source Description	Emissions Control(s)
Distillation of Sodium Contained in Remote-handled Transuranic (RH-TRU) Waste Lots 6 and 7 at INTEC	Two Banks of HEPA Filters PM ₁₀ Control Efficiency: 99.97%, each

DISTILLATION OF SODIUM FROM WASTE AT INTEC

3. Process Description

The sodium distillation system (SDS) consists of the following components: distillation vessel with a knife gate valve and electric furnace, condenser heated and cooled by a thermal fluid system, collection vessel, transfer vessel, sintered metal filter, and vacuum pump.

The sodium distillation system is installed in Building CPP-666, the Fluorinel Dissolution Process (FDP) and Fuel Storage Facility, containing the FDP cell at the Idaho Nuclear Technology and Engineering Center (INTEC). Remote-handled transuranic (RH-TRU) wastes are sorted, sized, and repackaged for disposal in this building. The objective of the permit is to remove sodium, using the distillation process, from the RH-TRU wastes. The sodium-vapor-distillation system is located at the minus 31-ft level of CPP-666. A tube, delayed neutron interrogator tube, extending from the FDP cell down to the sodium distillation vessel will be used as a pass-through to lower remote-handled radioactive waste, which is contaminated with elemental sodium, down into the SDS for sodium removal. Once the waste has been secured in the sodium distillation vessel, the device used to lower the waste into the vessel from the FDP cell will be detached and removed from the vessel. Then, the top of the vessel will be sealed remotely using the servo motor driven knife gate valve on the top of the vessel, and the sodium will be distilled from the vessel and collected in a collection vessel. After completion of the distillation cycle, the waste in the distillation vessel will be retrieved up through the delayed neutron interrogator tube to the FDP cell, where it can be repackaged for final disposition.

4. Emissions Control Description

Table 2. DISTILLATION OF SODIUM AT INTEC

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
SDS at INTEC	Two Banks of HEPA Filters Control efficiency: 99.97%, each	CPP-767-001 Stack

Emissions Limits

5. Radionuclide Emissions Limits - NESHAP

In accordance with 40 CFR 61.92, emissions of radionuclides to the ambient air from Department of Energy facilities shall not exceed those amounts that would cause any member of the public to receive, in any year, an effective dose equivalent of 10 millirems per year (mrem/yr).

[40 CFR 61, Subpart H]

Operating Requirements

6. CPP-767-001 Stack CEMS - NESHAP

In accordance with 40 CFR 61.93, the permittee shall have in place, calibrated, and operating, an in-stack continuous emission monitoring system (CEMS) for the measurement of radionuclides from the CPP-767-001 exhaust stack.

[40 CFR 61, Subpart H]

7. SDS HEPA Filter Systems

The permittee shall comply with the following requirements for the SDS HEPA filter system:

- Each HEPA filter shall have a minimum particle removal efficiency of no less than 99.97%.

- The permittee shall maintain and operate instrumentation to measure the pressure drop across the filter(s). HEPA filter efficiency shall be tested according to the ASME N510 and/or N511 testing standard(s). Records of any testing performed shall be maintained in accordance with the General Provisions of this permit.
- The permittee shall maintain written documentation to ensure compliance with this permit. This shall include, at a minimum, written procedures that specify how the pressure drop across the filter will be measured, the frequency of pressure drop monitoring, and the conditions that require change-out of the filters.

[State-only Requirement]

Monitoring and Recordkeeping Requirements

8. Radionuclide Emission Monitoring - NESHP

- In accordance with 40 CFR 61.93, the permittee shall monitor and record radionuclide emissions from the CPP-767-001 exhaust stack.
- In accordance with 40 CFR 61.93, the permittee shall determine radionuclide emissions and calculate effective dose equivalent values to members of the public using EPA-approved methods.

[40 CFR 61, Subpart H]

9. HEPA Filter Pressure Drop Monitoring

The permittee shall monitor and record the pressure drop across the HEPA filter stages of the HEPA filter system at least once per day according to written procedures.

[State-only Requirement]

Reporting Requirements

10. Radionuclide Emissions Compliance and Reporting - NESHP

The permittee shall submit annual reports and maintain records documenting radionuclide emissions and effective dose equivalent values in accordance with 40 CFR 61.94 and 61.95.

[40 CFR 61, Subpart H]

Incorporation of Federal Requirements by Reference

11. For permit conditions referencing or cited in accordance with 40 CFR Part 61 Subparts A or H, should there be any conflict between the requirements of the permit condition and the requirements of the CFR subpart, the requirements of the CFR subpart shall govern, including any amendments to that regulation.

[40 CFR 61, Subparts A and H]

GENERAL PROVISIONS

General Compliance

12. 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.]
13. 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]
14. 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

15. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- 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;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - 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

16. This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
[IDAPA 58.01.01.211.02, 5/1/94]
17. The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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;
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

18. 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.
19. 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.
20. Within 30 days, or up to 60 days when requested 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

21. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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]

Excess Emissions

22. 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

23. 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—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

24. 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

25. 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

26. 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

27. 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.

[IDAPA 58.01.01.211, 5/1/94]