GE 2002

1161

NORTH CAROLINA DIVISION OF AIR QUALITY

Air Quality Action Request

County: *New Hanover*

Name	**Location**	**Reg/Co./Prem.No.**
General Electric Company *Global Nuclear Fuel - Americas, LLC*	3901 Castle Hayne Road Wilmington, NC 28402	08/65/00070

Contact	**Address**	**Telephone**
Herbert Strickler Environment, Health & Safety Manager	P.O. Box 780 M/C J-26 Wilmington, NC 28402	910-675-5721

Type Action: CI EE XX SR PC VE PI **Other:**

Air Program Status 03 **Class:**Synthetic Minor **Chg:**

Action Requested By	**Address/Phone**	**Rec'd Date**
WiRO	910-395-3900	NA

Last Insp: 09/27/01 **Action Date**: 09/27/02 **Next Insp**: 09/30/03

Permit: 1756R16 **Issued**: 02/15/02 **Expires**: 01/01/05 **Stip:** NA **Met Y/N:** NA
Permit: 1161R18 **Issued**: 03/28/01 **Expires**: 01/01/05

Recommendations:	**Signature:**	**Date:**
Inspect facility as scheduled	Scott Sanders SR	10/02/02

Dist: Yellow (Central Files) **Blue (Region)** **White (Inspector)**

1. Contact was made with Priti Mathur, EHS Specialist and Phillip Ollis, Environmental Engineer.

2. GE has entered into a joint venture with two other companies and requested a name and ownership change to "Global Nuclear Fuel - Americas LLC". This ownership change involved the nuclear fuel manufacturing operation (FMO) and the fuel component manufacturing operation (FCO) of four former GE permits: 195R21, 1492R11, 1548R13, and 1756R14, which were consolidated into one air permit, No. 1756R14. Other changes to this permit were requested to update existing source ID numbers and to remove retired or exempted equipment from the permits(s). This permit, No. 1756R16, was recently modified by administrative amendment to reflect minor wording changes and to include regulation 2D .0958 and 2D .1806 which replaced 2D 0518(d) and 2D .0522, respectively. GE formerly had five (5) air permits, including No. 1161R15, which was also modified by administrative amendment to cover only the aircraft engine parts (1161R16). GE ownership and name will remain for this one permit. A renewal request was also processed. This permit, No. 1161R18, was recently modified by administrative amendment to reflect the correct scrubber identification on four control devices and to include regulation

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2D .0958 which replaced 2D .0518(d). One other equipment description was also corrected.

3. The inspection was lead by Priti Mathur, EHS Specialist and Phillip Ollis, Environmental Engineer. The inspection consisted of going through the facility and inspecting the permitted equipment. Opacity readings were obtained from various positions on the facility with the majority taken on the roof. General Electric / Global Nuclear Fuel must follow Nuclear Regulatory Commission regulations and is subject to frequent and extensive inspections by the Nuclear Regulatory Commission.

4. Applicable regulations for General Electric, Permit No. 1161R18, are as follows:

2D. 0515 " Particulates from Miscellaneous Industrial Processes "
2D. 0521 " Control of Visible Emissions "
2D. 0522 " Control and Prohibition of Odorous Emissions "
2D. 0535 " Excess Emissions Reporting and Malfunctions "
2D. 0958 " Work Practices for Sources of Volatile Organic Compounds "
2Q. 0315 " Synthetic Minor Facilities "

North Carolina Air Quality Permit No. 1161R18 **Issued: 03/28/01** **Expires: 01/01/05**

a) ***one packed, cross flow-type, wet scrubber and mist eliminator (ID No. E0007916, 250 gallons per minute nominal liquid injection rate) installed on the SCO metal cleaning and striking operation (ID No. SCO4),***

The opacity reading for visible emissions was 0% at the time of the inspection. This control device has a control efficiency of 95%. Maintenance checks are done weekly to ensure optimum efficiency. Emissions from this process are based on gallons used. Pursuant to the 1999 Emissions Inventory the controlled actual emissions from this process are as follows: Nitric Acid - 33.20 pounds; Hydrogen Chloride - 0.0025 pounds.

b) ***a chemical etch and clean system (Macroetch A System - ID No. AE1) controlled by a cross-flow wet scrubber (ID No. 9122 - 37.8 gallons of water per minute),***

The opacity reading for visible emissions was 0% at the time of the inspection. The scrubber has a control efficiency of 95%. Emissions from this process are based on gallons used. This process is basically a water based cleaning process. Pursuant to the 1999 Emissions Inventory the controlled actual emissions from this process are as follows: VOC - 111.23 pounds; Methanol - 64 pounds; Methylene Chloride - 25.26 pounds; Methyl Chloride - 5.86 pounds; Toluene - 15.84 pounds.

c) ***a chemical etch and clean system (Macroetch B System - ID No. AE2) controlled by a cross-flow wet scrubber (ID No. 9122 - 37.8 gallons of water per minute),***

This process had previously been taken offline by General Electric. The Macroetch B System did not operate in 1999. However, Phillip Ollis informed DAQ during the inspection that this equipment was currently operating. The opacity reading for visible emissions was 0% at the time of the inspection.

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d) a lubricant application booth (ID No. AE3) and curing oven (ID No. AE4) utilizing less than 40 pounds per day of photochemically reactive materials,

This equipment was not operating at the time of the inspection. The process runs on a batch mode which depends on the availability of parts. No control device is associated with this process. Actual emissions in 1999 for the lubricant application booth are as follows: VOC - 5.81 pounds; MEK - 1.94 pounds; Toluene - 3.87 pounds. Actual emissions in 1999 for the curing oven are as follows: VOC - 111.23 pounds; Methanol - 64 pounds; Methylene Chloride - 25.26 pounds; Methyl Chloride - 5.86 pounds; Toluene - 15.84 pounds.

e) a fluorescent penetrant inspection clean system (ID No. AE6) controlled by a cross-flow wet scrubber (ID No. 9121 - 25.2 gallons of water per minute),

The process and control device was observed operating at 0% opacity at the time of the inspection. Pursuant to the 1999 Emission Inventory, this process had no reportable emissions.

f) a coolant return fume hood (ID No. AE7) with a mist eliminator system consisting of a centrifugal mist separator, a metal mesh coalescing filter (4.0 square feet of filter area), and a bagfilter (110 square feet of filter area),

This process is no longer emitting to the atmosphere. The stack outlet has been covered. Pursuant to the 1999 Emission Inventory, this process had no reportable emissions.

g) an automated parts washer (ID No. AE8) controlled by a packed-tower wet scrubber (ID No. 9050 - 49.2 gallons of water per minute) in FPI

The opacity reading for visible emissions was 0% at the time of the inspection. Pursuant to the 1999 Emission Inventory, this process had no reportable emissions.

*** Pursuant to **Specific Condition and Limitation No. 7** in Permit No. 1161R18 the Permittee must have facility-wide PM-10 emissions less than 100 tons per consecutive twelve (12) month period. To comply with this limit, the Permittee must follow the following requirements:

Inspection and Maintenance Requirements

a) All Permitted Fabric Filters that are in Operation

To comply with the provisions of this Permit and ensure that the maximum control efficiency is maintained, the Permittee shall perform periodic inspections and maintenance as recommended by the manufacturer on all fabric filters that are in operation. These requirements are not specified for units that are not in operation.

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An annual internal inspection shall be conducted on the bagfilters by the Permittee to ensure the structural integrity such that the optimum control efficiency is achieved. The results of this inspection, and any maintenance performed on the bagfilter(s), shall be recorded in a log book, kept onsite, and made available to the DAQ upon request.

b) All Permitted Scrubbers

To comply with the provisions of this permit and ensure that the maximum control efficiency is maintained, the Permittee shall perform periodic inspections and maintenance as recommended by the manufacturer. As a minimum, the inspection and maintenance program will include inspection of spray nozzles, packing material, chemical feed system (if so equipped), and the cleaning/calibration of all associated instrumentation.

A log book for each scrubber shall be kept onsite and made available to DAQ personnel upon request. Any variance from manufacturers' recommendations shall be investigated with corrections made and date of actions recorded in the log book.

General Electric is in compliance with their Inspection and Maintenance Requirements. General Electric keeps all of their maintenance logs on the computer and are printed quarterly. The computer is programmed to keep a continuous status on all scrubbers and baghouses. General Electric also performs a hands on inspection of the scrubbers and baghouses as recommended by the manufacturer.

All of the permitted equipment contained in Permit No. 1161R18 is located in the GE Aircraft and Service Components building and was operating in compliance with Air Quality regulations at the time of the inspection.

5. Applicable regulations for Global Nuclear Fuel - Americas, LLC, Permit No. 1756R16, are as follows:

2D. 0503 " Particulates from Fuel Burning Indirect Heat Exchangers "
2D. 0515 " Particulates from Miscellaneous Industrial Processes "
2D. 0516 " Sulfur Dioxide Emissions from Combustion Sources "
2D. 0518 " Miscellaneous Volatile Organic Compound Emissions "
2D. 0521 " Control of Visible Emissions "
2D. 0535 " Excess Emissions Reporting and Malfunctions "
2D. 0958 " Work Practices for Sources of Volatile Organic Compounds "
2D. 1100 " Control of Toxic Air Pollutants "
2D. 1208 " Other Incinerators "
2D. 1806 " Control and Prohibition of Odorous Emissions "
2Q. 0315 " Synthetic Minor Facilities "
2Q. 0711 " Emission Rates Requiring a Permit "

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North Carolina Air Quality Permit No. 1756R16 **Issued: 02/15/02** **Expires: 01/01/05**

a) ***one 1,200 pounds per hour capacity, natural gas-fired multiple chambered incinerator (ID No. S13) (primary burner, 1.5 million Btu per hour minimum heat input and secondary burner, 2.5 million Btu per hour minimum heat input) burning Type 0 waste and used oil and controlled by a flue gas quencher (ID No. S0004572 - 58 gallons of water per minute), a venturi scrubber (ID No. S0004570 - 100 gallons of water per minute), a vertical countercurrent packed bed scrubber (ID No. S0004573 - 162 gallons per minute), and a bagfilter (ID No. S0004605 - 1,696 square feet of filter area) installed in series***

The incinerator was operating at 0% opacity during the inspection. This area is contained and highly secured due to possible radiation, therefore, requiring a dress out procedure. The combined control efficiency of the control devices is 99.5%. Pursuant to the 1999 Emissions Inventory, the process emitted the following pollutants after controls in 1999: CO - 0.77 tons; NOx - 0.92 tons; PM - 0.07 tons; VOC - 0.05 tons; Ammonia - 59.01 pounds; Fluorides - 1.82 pounds; Formaldehyde - 1.38 pounds; and HCL - 7.72 pounds Any other emitted pollutant was very minimal.

To ensure compliance with the toxic emissions limits for arsenic and cadmium, the charge in the incinerator shall not exceed 1,200 pounds per hour of Type O waste and used oil. Under **Specific Condition A, Item 9 (b)**, the previous year's log of waste charge rates into the incinerator, in units of pounds per hour, shall be reported to the Regional Supervisor, Division of Air Quality within thirty (30) days after each calendar year. This report, received January 30, 2002, indicates compliance with the charging rate for calendar year 2001. The maximum charge rate for the incinerator was 342 pounds per hour for combustible waste boxes and 68 pounds per hour for used oil. A copy of the report is attached.

b) ***one 100 ton capacity hydrated lime storage tank (ID No. S37) controlled by a bagfilter (ID No. S0006008 - 178 square feet of filter area)***

This process was not in operation during the inspection. The process and control device is located in the waste treatment area. The control efficiency of the bagfilter is 99.5 %. The maximum process rate for the process is 10 tons per hour. The annual throughput for 1999 was 473 tons. Pursuant to the 1999 Emissions Inventory, the process emitted the following pollutant after controls in 1999: PM - 1.44 pounds.

c) ***two steam jacketed wastewater treatment plant sludge (calcium fluoride) dryers (ID No. S07) controlled by one impingement-type wet scrubber (ID No. S0002304 - 6 gallons of water per minute) installed in series with one cyclonic wet scrubber (ID No. S0002302 - 4 gallons of water per minute)***

This process was not in operation during the inspection. The process and control device is located in the waste treatment area. The dry conversion process has taken over much of this process. Not much sludge is being produced. The control efficiency of the control devices is 95%. Pursuant to the 1999 Emissions Inventory, the process emitted the following pollutants after controls in 1999: Fluorides - 0.279 pounds.

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d) ventilation hoods and process tank vents (ID No. S08) at the URLS Facility controlled by a packed bed-type scrubber (ID No. H0007423 - 36 gallons of water per minute)

This process was not operating during the inspection. It has not operated in approximately one year. The process is contained and highly secured due to possible radiation, therefore, requiring a dress out procedure. The control efficiency of the control device is 95 %. Pursuant to the 1999 Emissions Inventory, the process emitted the following pollutant after controls in 1999: Fluorides - 0.01 pounds.

e) two natural gas and/or No. 2 fuel oil-fired 350 horsepower boilers (ID Nos. FM12 and FM14)

One boiler was operating at 0% at the time of the inspection. These boilers are located in the boiler room in the same vicinity as the incinerator. The boilers have a operation schedule of 24 hours per day, 7 days per week, and 52 weeks per year (8760 hours total). The boilers are fueled with natural gas or No. 2 fuel oil. No. 2 fuel oil is used most frequently.

f) one natural gas and/or No. 2 fuel-oil fired 600 horsepower boiler (ID No. S04)

This boiler was not operating during the inspection. This boiler has not operated in approximately two years. The boiler is located in the waste treatment area and is fueled with natural gas or No. 2 fuel oil.

g) one 650 kW diesel fuel-fired emergency generator (ID No. S35)

This generator was not operating during the inspection. It operated 65 total hours in 2001.

h) one 500 kW diesel fuel-fired emergency generator (ID No. S36)

This generator was not operating during the inspection. It operated 69 total hours in 2001.

i) one 150kW diesel fuel-fired emergency generator (ID No. S38)

This generator was not operating during the inspection. It operated 53 total hours in 2001.

j) two diesel fuel-fired load shedding generators (ID Nos. S39 and S40) each with a capacity of 1,250kW

These generators were not operating during the inspection. S39 operated 102 hours in 2001 and S40 operated 81 hours in 2001.

k) the system 541X dissolver and liquid filter areas (ID No. FM03) and the system 546X FMOX conversion area exhaust (ID no. FM04) both controlled by one impingement plate-type wet scrubber (ID No. H0007144 - 762 gallons of water per minute)

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This process was operating at 0% opacity at the time of the inspection. This process operates 24 hours per day, 7 days per week, and 50 weeks per year. The control device has a control efficiency of 99%. Pursuant to the 1999 Emission Inventory, this process emitted the following pollutants after controls in 1999: Fluorides - 0.242 pounds.

l) process operations in the uranium waste recovery system (ID No. FM06) controlled by a cross flow gravity spray chamber (ID No. H0008002 - 120 gallons of water per minute), a condenser (De-entrainer), a venturi scrubber (ID No. S0008740 - 30 gallons of water per minute), and a plate tower scrubber (ID No. H0008000)

This process was not operating at the time of the inspection. This process operates infrequently. The dry conversion took over and cut down some of the waste associated with this process. The control device has a control efficiency of 99%. Pursuant to the 1999 Emission Inventory, this process emitted the following pollutants after controls in 1999: Fluorides - 0.10 pounds.

m) a grinding system (ID No. FM15) composed of nine hammermills (ID Nos. W0008021 - W0008026 and W0008028-W0008030) each controlled by a bagfilter ducted to the system 2020 exhaust

This process was operating at 0% opacity during the inspection. Only one of the hammermills was running. Pursuant to the 1999 Emission Inventory, this process had no reportable emissions.

n) one HF recovery system (ID No. H3001-1) including three recovery condensers and two countercurrent absorption columns installed on three identical dry conversion process (DCP) lines

Pursuant to the 1999 Emissions Inventory, this process emitted 1.39 pounds of Fluorides. The opacity reading for visible emissions was 0% at the time of the inspection. The control devices have a control efficiency of 99%.

o) the HF Building emergency vent (ID No. H3003) controlled by an emergency ventilation two stage wet scrubber system (ID No. DCP09010 - 25 gallons of water per minute)

Pursuant to the 1999 Emissions Inventory, this process had zero emissions for 1999. The control device has a control efficiency of 98%. This process was not operating at the time of the inspection. It operates only in an emergency situation when HF levels have been detected at high levels.

p) one drum sand blasting unit (ID No. S58) controlled by a bagfilter (2,712 square feet of filter area)

This process was not operating during the inspection. This process operated 100 hours in 1999. The control efficiency of the control device is 99.5%. Pursuant to the 1999 Emission Inventory, the process emitted the following pollutant after controls in 1999: PM - 10 pounds.

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q) a painting operation (ID No. S59) composed of one dry filter type paint spray booth and a steam-heated drying oven using nonphotochemically reactive solvents

This process was not operating during the inspection. This process used 441 gallons in 2001. Pursuant to the 1999 Emission Inventory, the process emitted the following pollutants after controls in 1999: VOC - 0.22 tons.

r) the combined exhaust (ID no. FM01) from the north chemical area dust collection system (system 541) and the south chemical area dust collection system (system 546) controlled by a spray-type wet scrubber (ID No. H0007143 - 600 gallons of water per minute)

The process operation schedule is 24 hours per day, 7 days per week, and 50 weeks per year (8400 hours total). The control device has a control efficiency of 99% for Fluorides and 50% for Ammonia. Pursuant to the 1999 Emission Inventory, the process emitted the following pollutants after controls in 1999: Fluorides - 0.96 pounds; Ammonia - 0.39 tons. The opacity reading for visible emissions was 0% at the time of the inspection.

s) nitric acid storage tank vent (ID No. FC01) controlled by a packed tower-type wet scrubber (ID No. M0007939 - 20 gallons of water per minute)

This process was not operating at the time of the inspection. This process is located in the Nuclear Energy Fuel Component Operations building. The control device had a control efficiency of 60% for Nitric Acid and a control efficiency of 0% for Hydrogen Fluoride and Ammonia. Pursuant to the 1999 Emission Inventory, this process emitted the following pollutants in 1999: Ammonia - 1.71 pounds; Nitric Acid - 7.49 pounds; Hydrogen Fluoride - 26.76 pounds. This stack and scrubber has been removed. This process vents to the crossflow wet scubber (item t) listed directly below .

t) the FCO etch line (ID No. FC02) controlled by a cross flow wet scrubber (ID No. M0007940 - 250 gallons of water per minute)

The process has an operation schedule of 24 hours per day, 7 days per week, and 50 weeks per year (8400 hours total). The control device has a control efficiency greater than 95%. Pursuant to the 1999 Emission Inventory, the process emitted the following pollutants after controls in 1999: Fluorides - 27.90 pounds; Nitric Acid - 143.0 pounds. The opacity reading for visible emissions was 0% at the time of the inspection. This process is located in the Nuclear Energy Fuel Component Operations building.

u) a grit blast operation (ID No. FC06) composed of two grit blasters units controlled by two bagfilters (ID Nos. M0002200 and M0002208 - 944 and 1,416 square feet of filter area, respectively)

The process has an operation schedule of 16 hours per day, 5 days per week, and 50 weeks per year (4000 hours total). The control device has a control efficiency 99.85%. Pursuant to the 1999 Emission Inventory, this process emitted the following pollutant after controls in 1999: PM - 0.04 tons; Ammonia - 8.83 pounds. The opacity reading for visible emissions was 0% at the time of the inspection. This process is located in the Nuclear Energy Fuel Component Operations building.

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*** Pursuant to **Specific Condition and Limitation No. 9** in Permit No. 1756R16, the Permittee must not exceed a charge rate of 1,200 pounds per hour into the incinerator. This limitation will ensure compliance with the emission limits for Arsenic (0.166 pounds per year) and Cadmium (1.66 pounds per year). For compliance purposes, the Permittee must submit in writing (thirty days after each calendar year) the previous year's log of waste charge rates into the incinerator. This report was received on January 30, 2002. Global Nuclear Fuel did not exceed a charge rate greater than 342 pounds per hour for calendar year 2001. *Global Nuclear Fuel is in compliance with **Specific Condition and Limitation No. 9**.*

*** Pursuant to **Specific Condition and Limitation No. 12** in Permit No. 1756R16, the Permittee must have facility-wide NOx and SO2 emissions less than 100 tons per consecutive twelve months.

a) To ensure enforceability of this limit, the following restrictions shall apply:

(i) the operating hours of the 150, 500, and 650kW generators (ID Nos. S35, S36, and S38) shall not exceed 240 hours per consecutive twelve month period.

These generators operated a total of 187 hours in 2001.

(ii) the operating hours of the two 1,250kW load shedding generators (ID Nos. S39 and S40) shall not exceed 1320 hour per consecutive 12 month period.

These generators operated a total of 183 hours in 2001.

(iii) the sulfur content of the No. 2 fuel oil used for the boiler shall be limited to 0.4% by weight.

(iv) the sulfur content of diesel fuel used for the diesel generator shall be limited to 0.2% by weight.

The sulfur content for the No. 2 fuel oil combusted in the generators and boilers is less than 0.2 % by weight. Certifications are sent from the vendor. These sulfur percentages are in compliance.

b) For compliance purposes, the Permittee shall record monthly and total annually the following:

(i) the hours of operation for each generator

(ii) the facility-wide gallons of No. 2 fuel oil and diesel fuel combusted.

*Global Nuclear Fuel is in compliance with **Specific Condition and Limitation No. 12.***

*** Pursuant to **Specific Condition and Limitation No. 14** in Permit No. 1756R16, the Permittee must have facility-wide Hydrogen Fluoride emissions less than 10 tons per consecutive twelve months. To comply with this limit, the Permittee shall maintain a minimum flow rate of 20 liters per hour (0.088 gal/min) to each washing column (i.e., scrubber) associated with the HF recovery system (ID No. H3001) during normal source operations.

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Global Nuclear Fuel's computer keeps a status report on the minimum flow rate of each scrubber associated with the Hydrogen Fluoride system. Pursuant to the 2001 Emission Inventory, less than 50 pounds of HF was emitted in 2001. Compliance is achieved with the flow rates for the scrubbers and total emissions of HF per year to avoid Title V.

***Pursuant to **Specific Condition and Limitation No. 13** in Permit No. 1756R16, the Permittee must have facility-wide individual HAP/total HAPs/total VOC emissions less than 10/25/100 tons per consecutive twelve month period. To comply with this limit, the Permittee shall follow the following restrictions:

a) the maximum gallons of paint applied in the painting operation (ID No. S59) shall not exceed 21,840 gallons of paint per consecutive twelve month period.

A total of 441 gallons were applied in 2001. Pursuant to the 1999 Emission Inventory, 0.22 tons of VOC was emitted from this process in 1999. Compliance is achieved with the throughput limits.

b) the VOC content of the paint used in the paint booth shall be limited to 1.2 lbs VOC/gallon.

Compliance is achieved with the VOC content. The VOC content is usually around 0.7 lbs VOC/gallon. Compliance is determined by review of MSDS and certifications by the vendor.

*** Pursuant to **Specific Condition and Limitation No. 15** in Permit No. 1756R16, the Permittee must have facility-wide PM-10 emissions less than 100 tons per consecutive twelve (12) months. To comply with this limit, the Permittee must follow the following requirements:

Inspection and Maintenance Requirements

a) All Permitted Fabric Filters that are in Operation

To comply with the provisions of this Permit and ensure that maximum control efficiency is maintained, the Permittee shall perform periodic inspections and maintenance as recommended by the manufacturer on all fabric filters that are in operation. These requirements are not specified for units that are not in operation.

An annual internal inspection shall be conducted on the bagfilter by the Permittee to ensure structural integrity such that optimum control efficiency is achieved. The results of this inspection, and any maintenance performed on the bagfilters, shall be recorded in a log book which will be kept onsite and made available to the DAQ upon request.

b) All Permitted Scrubbers (except the tank farm scrubber on the nitric acid storage tank vent, ID No. M0007939)

To comply with the provisions of this Permit and ensure that maximum control efficiency is maintained, the Permittee shall perform periodic inspections and maintenance as recommended by the manufacturer. As a minimum, the inspection and maintenance program will include inspection of spray nozzles, packing material, chemical feed system (if so equipped), and the

RECD AIR REPORTS OCT 25 2002 DAQ

cleaning/calibration of all associated instrumentation.

A scrubber log book for all scrubbers shall be kept onsite and made available to DAQ personnel upon request. Any variance from manufacturers' recommendations shall be investigated with corrections made and date of actions recorded in the logbook.

Global Nuclear Fuel is in compliance with their Inspection and Maintenance Requirements. Global Nuclear Fuel keeps all of their maintenance logs on the computer. The computer is programmed to keep a continuous status on all scrubbers and baghouses. Global Nuclear Fuel also performs a hands on inspection of the scrubbers and baghouses as recommended by the manufacturer.

All of the permitted equipment contained in Permit No. 1756R16 was operating in compliance with Air Quality regulations at the time of the inspection.

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OCT 25 02

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF AIR QUALITY

NCDENR

MICHAEL F. EASLEY
GOVERNOR

WILLIAM G. ROSS JR.
SECRETARY

ALAN W. KLIMEK, P.E.
DIRECTOR

February 11, 2002

Mr. Herb Strickler
Environment, Health, and Safety Manager
Global Nuclear Fuel – Americas, LLC
P.O. Box 780
Wilmington, NC 28402

Subject: Annual Reporting Requirement
Global Nuclear Fuel –
Americas, LLC
Wilmington, North Carolina
New Hanover County

Dear Mr. Strickler:

The data reported in your annual report complies with the annual reporting requirement contained in **Specific Condition and Limitation No. 10 of Permit No. 1756R15**. The data contained in the report is for the calendar year 2001.

Calculations indicate Global Nuclear Fuel – Americas, LLC has complied with the incinerator charge rate allowed by Permit No. 1756R15.

If you have any questions regarding this matter, please contact me at (910) 395-3900 Ext. 288.

Sincerely,

Scott Sanders
Environmental Technician V

cc: WiRO
CF

WILMINGTON REGIONAL OFFICE
127 CARDINAL DRIVE EXTENSION, WILMINGTON, NC 28405
PHONE (910) 395-3900 FAX (910) 350-2004 WWW.ENR.STATE.NC.US/ENR/
AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER – 50% RECYCLED/10% POST CONSUMER PAPER

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Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

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January 28, 2002

Mr. Wayne Cook
Regional Air Quality Supervisor
North Carolina Department of Environment and Natural Resources
Division of Air Quality
127 Cardinal Drive Extension
Wilmington, NC 28405-3845

Subject: Incinerator Report per Air Permit 1756R15 Specific Condition (A), item 10 (b)

Dear Mr. Cook,

Attached is the incinerator charge rate data demonstrating compliance with Air Permit 1756R15. To ensure toxic air pollutant emission limits specified in the permit are not exceeded, the charge rate in the incinerator must not exceed 1,200 pounds per hour of Type O waste and waste oil. Under Specific Condition A, item 10 (b) "the previous year's log of waste charge rates into the incinerator, in units of pounds per hour" must be reported to the Regional Supervisor, Division of Air Quality within (30) thirty days after each calendar year. We believe this report meets the above stated requirement.

The enclosed spreadsheet is the incinerator waste charge report for the 2001 calendar year. There were a total of 538 combustible waste boxes burned equating to 285,913 pounds. The average charge rate for combustible waste boxes was 123 pounds per hour with a maximum of 342 pounds per hour, below the permit maximum of 1,200 pounds per hour. The total oil consumption was 4,495 pounds with an average of 40 pounds per hour and a maximum of 68 pounds per hour.

If you have any questions, feel free to contact me at (910) 675-5721 or Priti Mathur at (910) 675-5295.

Sincerely,

Herb Strickler

Herb Strickler, Manager
Site Environment, Health, & Safety

Enclosure: 2001 Incinerator Waste Charge Report

cc: S. Sanders
~~A. Armistead~~ w/o enclosure
HRS-01-008

TOTAL = 285,913 lb/yr Type O
= 4,495 lb/yr Used oil
= 290,408 lb

Type O = 98 % - total basis
Used oil = 2 %

2000 = 87 % Type O - Hourly Basis.
13 % Used oil

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Box Burn Data

Burn 00-01				Burn 00-02			
Date	Shift	Weight (lbs)	Burn Rate (lbs/hr)	Date	Shift	Weight (lbs)	Burn Rate (lbs/hr)
1/15/01	GYD	589	147.3	3/26/01	GYD	0	0.0
	DAY	970	121.3		DAY	0	0.0
	EVE	944	118.0		EVE	1214	151.8
1/16/01	GYD	970	121.3	3/27/01	GYD	956	119.5
	DAY	968	121.0		DAY	982	122.8
	EVE	611	152.8		EVE	1246	155.8
1/17/01	GYD	1100	137.5	3/28/01	GYD	1020	127.5
	DAY	1072	134.0		DAY	1118	139.8
	EVE	1154	144.3		EVE	886	110.8
1/18/01	GYD	1142	142.8	3/29/01	GYD	1050	131.3
	DAY	842	105.3		DAY	0	0.0
	EVE	551	68.9		EVE	519	129.8
1/19/01	GYD	1106	138.3	3/30/01	GYD	966	120.8
	DAY	0	0.0		DAY	0	0.0
	EVE	0	0.0		EVE	0	0.0
1/22/01	GYD	0	0.0	4/2/01	GYD	0	0.0
	DAY	990	123.8		DAY	437	109.3
	EVE	898	112.3		EVE	0	0.0
1/23/01	GYD	954	119.3	4/3/01	GYD	605	151.3
	DAY	946	118.3		DAY	1266	158.3
	EVE	1094	136.8		EVE	537	268.5
1/24/01	GYD	1042	130.3	4/4/01	GYD	0	0.0
	DAY	1052	131.5		DAY	1082	135.3
	EVE	928	116.0		EVE	974	121.8
1/25/01	GYD	884	110.5	4/5/01	GYD	1090	136.3
	DAY	527	87.8		DAY	1038	129.8
	EVE	976	122.0		EVE	689	86.1
1/26/01	GYD	900	112.5	4/6/01	GYD	965	120.6
	DAY	0	0.0		DAY	0	0.0
	EVE	0	0.0		EVE	0	0.0
2/19/01	GYD	0	0.0	4/9/01	GYD	0	0.0
	DAY	0	0.0		DAY	1020	127.5
	EVE	1166	145.8		EVE	0	0.0
2/20/01	GYD	992	124.0	4/11/01	GYD	607	151.8
	DAY	1032	129.0		DAY	0	0.0
	EVE	1012	126.5		EVE	0	0.0
2/21/01	GYD	1054	131.8	4/12/01	GYD	932	0.0
	DAY	1204	150.5		DAY	1022	127.8
	EVE	982	122.8		EVE	1082	135.3
2/22/01	GYD	609	76.1	4/13/01	GYD	1014	126.8
	DAY	1110	138.8		DAY	0	0.0
	EVE	1052	131.5		EVE	0	0.0
2/23/01	GYD	1112	139.0	4/17/01	GYD	0	0.0
	DAY	0	0.0		DAY	439	109.8
	EVE	0	0.0		EVE	954	119.3
	GYD	0	0.0		GYD	920	115.0

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2/26/01	DAY	964	120.5	4/18/01	DAY	373	62.2
	EVE	1056	132.0		EVE	499	99.8
2/27/01	GYD	1136	142.0	-	-	-	-
	DAY	0	0.0	-	-	-	-
	EVE	519	86.5	-	-	-	-
2/28/01	GYD	1224	153.0	-	-	-	-
	DAY	1008	126.0	-	-	-	-
	EVE	992	124.0	-	-	-	-
3/1/01	GYD	944	118.0	-	-	-	-
	DAY	1066	133.3	-	-	-	-
	EVE	986	123.3	-	-	-	-
3/2/01	GYD	1062	132.8	-	-	-	-
	DAY	0	0.0	-	-	-	-
	EVE	0	0.0	-	-	-	-
3/5/01	GYD	0	0.0	-	-	-	-
	DAY	529	264.5	-	-	-	-
	EVE	0	0.0	-	-	-	-
3/6/01	GYD	0	0.0	-	-	-	-
	DAY	427	71.2	-	-	-	-
	EVE	1130	141.3	-	-	-	-
3/7/01	GYD	1132	141.5	-	-	-	-
	DAY	1306	163.3	-	-	-	-
	EVE	1124	140.5	-	-	-	-
3/8/01	GYD	976	122.0	-	-	-	-
	DAY	1072	134.0	-	-	-	-
	EVE	1040	130.0	-	-	-	-
3/9/01	GYD	1208	151.0	-	-	-	-
	DAY	0	0.0	-	-	-	-
	EVE	0	0.0	-	-	-	-
3/12/01	GYD	0	0.0	-	-	-	-
	DAY	908	113.5	-	-	-	-
	EVE	1030	128.8	-	-	-	-
3/13/01	GYD	1220	152.5	-	-	-	-
	DAY	970	121.3	-	-	-	-
	EVE	1076	134.5	-	-	-	-
3/14/01	GYD	1068	133.5	-	-	-	-
	DAY	1052	131.5	-	-	-	-
	EVE	1004	125.5	-	-	-	-
3/15/01	GYD	1048	131.0	-	-	-	-
	DAY	998	124.8	-	-	-	-
	EVE	1012	126.5	-	-	-	-
3/16/01	GYD	1040	130.0	-	-	-	-
	DAY	0	0.0	-	-	-	-
	EVE	0	0.0	-	-	-	-
3/19/01	GYD	0	0.0	-	-	-	-
	DAY	1086	135.8	-	-	-	-
	EVE	0	0.0	-	-	-	-

Weight Statistics (lbs)				Weight Statistics (lbs)			
Total		68948	-	Total		27502	-
Maximum		1306	265	Maximum		1266	269
Minimum		427	71.2	Minimum		373	62.2
Mean		985	129	Mean		636	90
Median		1021	130	Median		788	121

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Box Burn Data

Burn 00-03				Burn 00-04			
Date	Shift	Weight (lbs)	Burn Rate (lbs/hr)	Date	Shift	Weight (lbs)	Burn Rate (lbs/hr)
7/23/01	GYD	595	148.8	8/22/01	GYD	0	0.0
	DAY	998	124.8		DAY	895	111.9
	EVE	978	122.3		EVE	1065	133.1
7/24/01	GYD	1073	134.1	8/23/01	GYD	0	0.0
	DAY	919	114.9		DAY	0	0.0
	EVE	1128	141.0		EVE	537	119.3
7/25/01	GYD	1107	138.4	8/24/01	GYD	1115	139.4
	DAY	1113	139.1		DAY	0	0.0
	EVE	518	64.8		EVE	0	0.0
7/26/01	GYD	1364	170.5	8/27/01	GYD	0	0.0
	DAY	1067	133.4		DAY	0	0.0
	EVE	1090	136.3		EVE	877	109.6
7/27/01	GYD	1114	139.3	8/28/01	GYD	943	117.9
	DAY	0	0.0		DAY	525	131.3
	EVE	0	0.0		EVE	0	0.0
7/30/01	GYD	0	0.0	9/4/01	GYD	556	185.3
	DAY	1011	126.4		DAY	1109	138.6
	EVE	994	124.3		EVE	898	163.3
7/31/01	GYD	1293	161.6	9/5/01	GYD	850	106.3
	DAY	1045	130.6		DAY	1126	140.8
	EVE	1255	156.9		EVE	1173	146.6
8/1/01	GYD	1200	150.0	9/6/01	GYD	915	114.4
	DAY	1017	127.1		DAY	1001	125.1
	EVE	1019	127.4		EVE	1144	143.0
8/2/01	GYD	0	0.0	9/10/01	GYD	0	0.0
	DAY	1117	139.6		DAY	968	121.0
	EVE	1036	129.5		EVE	1086	135.8
8/3/01	GYD	1167	145.9	9/11/01	GYD	1232	154.0
	DAY	0	0.0		DAY	1032	129.0
	EVE	0	0.0		EVE	1229	153.6
8/8/01	GYD	0	0.0	9/12/01	GYD	1095	136.9
	DAY	0	0.0		DAY	1119	139.9
	EVE	693	115.5		EVE	1145	143.1
8/9/01	GYD	916	114.5	9/13/01	GYD	1198	149.8
	DAY	967	120.9		DAY	915	114.4
	EVE	1055	131.9		EVE	1214	151.8
8/13/01	GYD	0	0.0	9/14/01	GYD	994	124.3
	DAY	808	101.0		DAY	0	0.0
	EVE	1166	145.8		EVE	0	0.0
8/14/01	GYD	1049	131.1	9/18/01	GYD	1498	187.3
	DAY	799	99.9		DAY	1049	131.1
	EVE	979	122.4		EVE	1108	138.5
8/15/01	GYD	0	0.0	9/19/01	GYD	1039	129.9
	DAY	0	0.0		DAY	1056	132.0
	EVE	947	118.4		EVE	1148	143.5
	GYD	1011	126.4		GYD	0	0.0

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8/16/01	DAY	935	116.9	9/20/01	DAY	0	0.0
	EVE	884	110.5		EVE	1052	131.5
	GYD	995	124.4		GYD	1146	143.3
8/17/01	DAY	0	0.0	9/21/01	DAY	0	0.0
	EVE	0	0.0		EVE	0	0.0
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
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-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
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-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-

Weight Statistics (lbs)

Total	[redacted]	38422	-
Maximum	[redacted]	1364	171
Minimum	[redacted]	518	64.8
Mean	[redacted]	912	117
Median	[redacted]	1014	127

Weight Statistics (lbs)

Total	[redacted]	37052	-
Maximum	[redacted]	1498	187
Minimum	[redacted]	525	109.6
Mean	[redacted]	732	94
Median	[redacted]	956	123

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Box Burn Data

Burn 00-05				Burn 00-06			
Date	Shift	Weight (lbs)	Burn Rate (lbs/hr)	Date	Shift	Weight (lbs)	Burn Rate (lbs/hr)
9/26/01	GYD	0	0.0	10/24/01	GYD	1700	212.5
	DAY	0	0.0		DAY	1518	189.8
	EVE	873	218.3		EVE	945	157.5
9/27/01	GYD	1739	217.4	10/29/01	GYD	0	0.0
	DAY	1578	197.3		DAY	1623	202.9
	EVE	1331	166.4		EVE	1532	255.3
9/28/01	GYD	1469	183.6	11/6/01	GYD	1001	333.7
	DAY	0	0.0		DAY	623	207.7
	EVE	0	0.0		EVE	1021	127.6
10/1/01	GYD	0	0.0	11/7/01	GYD	533	177.7
	DAY	1389	173.6		DAY	0	0.0
	EVE	1492	186.5		EVE	1004	223.1
10/2/01	GYD	1473	184.1	11/8/01	GYD	1575	196.9
	DAY	1519	189.9		DAY	882	110.3
	EVE	532	133.0		EVE	0	0.0
10/3/01	GYD	0	0.0	11/12/01	GYD	0	0.0
	DAY	0	0.0		DAY	853	284.3
	EVE	1475	184.4		EVE	1393	174.1
10/4/01	GYD	1684	210.5	11/13/01	GYD	1410	176.3
	DAY	1584	198.0		DAY	1902	237.8
	EVE	1529	191.1		EVE	2002	250.3
10/5/01	GYD	1653	206.6	11/14/01	GYD	1758	219.8
	DAY	0	0.0		DAY	1976	247.0
	EVE	0	0.0		EVE	2010	251.3
10/8/01	GYD	0	0.0	11/15/01	GYD	1807	225.9
	DAY	1626	203.3		DAY	1443	180.4
	EVE	1550	193.8		EVE	525	131.3
10/9/01	GYD	1606	200.8	11/27/01	GYD	1565	195.6
	DAY	1409	176.1		DAY	1394	174.3
	EVE	1582	197.8		EVE	1583	197.9
10/10/01	GYD	1504	188.0	11/28/01	GYD	1410	176.3
	DAY	971	121.4		DAY	1632	204.0
	EVE	1499	187.4		EVE	1383	172.9
10/11/01	GYD	1498	187.3	11/29/01	GYD	1752	219.0
	DAY	966	120.8		DAY	1313	0.0
	EVE	1709	213.6		EVE	1538	192.3
10/12/01	GYD	1520	190.0	11/30/01	GYD	1649	206.1
	DAY	0	0.0		DAY	0	0.0
	EVE	0	0.0		EVE	0	0.0
-	-	-	-	12/3/01	GYD	0	0.0
-	-	-	-		DAY	1485	297.0
-	-	-	-		EVE	2268	283.5
-	-	-	-	12/4/01	GYD	1754	219.3
-	-	-	-		DAY	948	158.0
-	-	-	-		EVE	1291	161.4
-	-	-	-		GYD	1283	160.4

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-	-	-	-	12/5/01	DAY	1890	236.3
-	-	-	-		EVE	1373	171.6
-	-	-	-	12/6/01	GYD	1607	200.9
-	-	-	-		DAY	1597	199.6
-	-	-	-		EVE	1442	180.3
-	-	-	-	12/7/01	GYD	1642	205.3
-	-	-	-		DAY	0	0.0
-	-	-	-		EVE	0	0.0
-	-	-	-	12/11/01	GYD	1457	291.4
-	-	-	-		DAY	2272	284.0
-	-	-	-		EVE	1731	216.4
-	-	-	-	12/12/01	GYD	2738	342.3
-	-	-	-		DAY	2196	274.5
-	-	-	-		EVE	0	0.0
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
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-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-

Weight Statistics (lbs)

Total		38760	-
Maximum		1739	218
Minimum		532	120.8
Mean		976	125
Median		1471	184

Weight Statistics (lbs)

Total		75229	-
Maximum		2738	342
Minimum		525	110
Mean		1298	182
Median		1485	203

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Box Burn Data

Shift Statistics

Maximum Weight (lbs)	2738	GYD
Minimum Weight (lbs)	373	DAY
Mean Weight (lbs)	923	

Maximum Rate (lbs/hr)	342	GYD
Minimum Rate (lbs/hr)	62.2	DAY
Mean Rate (lbs/hr)	123	

Summary Statistics

Total Boxes Burned	538
Total Pounds Burned	285913

2001	QTR 1	QTR 2	QTR 3	QTR 4
Total Weight Burned (lbs)	78905	17545	76457	106999
Mean Weight (lbs)	986	835	1044	1486
Maximum Weight (lbs)	1306	1266	1739	2738
Maximum Weight (shift)	DAY	DAY	GYD	GYD
Minimum Weight (lbs)	427	373	518	532
Minimum Weight (shift)	DAY	DAY	EVE	EVE
Mean Rate (lbs/hr)	129	130	133	200.4
Maximum Rate (lbs/hr)	265	269	218.0	342
Maximum Rate (shift)	DAY	EVE	EVE	GYD
Minimum Rate (lbs/hr)	71.2	62.2	64.8	110
Minimum Rate (shift)	DAY	DAY	EVE	DAY

RECD AIR RECORDS MGMT
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Oil Burn Data

Burn 00-01					
Date	Shift	Inches	Gallons	Weight (lbs)	Burn Rate (lbs/hr)
1/29/01	GYD	0.0	0.0	0.0	0.0
	DAY	0.0	0.0	0.0	0.0
	EVE	2.6	37.0	267.0	66.7
1/30/01	GYD	5.2	73.0	534.0	66.7
	DAY	0.0	0.0	0.0	0.0
	EVE	4.5	63.0	461.8	57.7
1/31/01	GYD	4.0	56.0	410.5	68.4
	DAY	0.0	0.0	0.0	0.0
	EVE	0.0	0.0	0.0	0.0
2/1/01	GYD	0.0	0.0	0.0	0.0
	DAY	0.0	0.0	0.0	0.0
	EVE	1.0	14.0	102.6	25.7
2/2/01	GYD	2.0	28.0	205.2	25.7
	DAY	0.0	0.0	0.0	0.0
	EVE	0.0	0.0	0.0	0.0
2/5/01	GYD	0.0	0.0	0.0	0.0
	DAY	4.0	56.0	410.5	58.6
	EVE	4.0	56.0	410.5	51.3
2/6/01	GYD	4.0	56.0	410.5	51.3
	DAY	2.0	28.0	205.2	25.7
	EVE	1.0	14.0	102.6	15.8
2/7/01	GYD	1.5	21.0	153.9	25.7
	DAY	1.5	21.0	153.9	38.5
	EVE	1.5	21.0	153.9	19.2
2/8/01	GYD	2.0	28.0	205.2	25.7
	DAY	2.0	28.0	205.2	25.7
	EVE	0.0	0.0	0.0	0.0
2/9/01	GYD	1.0	14.0	102.6	34.2
	DAY	0.0	0.0	0.0	0.0
	EVE	0.0	0.0	0.0	0.0

Weight Statistics (lbs)

Total		44	614	4495	682
Maximum		5	73	534	68
Minimum		1	14	103	16
Mean		3	36	264	40
Median		2	28	205	34

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Oil Burn Data

Shift Statistics

Maximum Weight (lbs)	534	EVE
Minimum Weight (lbs)	102.6	GYD
Mean Weight (lbs)	264	

Maximum Rate (lbs/hr)	68	GYD
Minimum Rate (lbs/hr)	15.8	EVE
Mean Rate (lbs/hr)	40	

Summary Statistics

Total Gallons Burned	614.0
Total Pounds Burned	4495.3
Total Drums Burned	11

Boxes Ave = 123 lb/hr

Oil Ave = 40 lb/hr

$\frac{123}{163} = 75\%$

$\frac{40}{163} = 25\%$

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