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2004 GNF

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NORTH CAROLINA DIVISION OF AIR QUALITY

Air Quality Action Request

County: New Hanover

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

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

Type Action: CI EE <u>XX</u> SR PC VE PI	Other:
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Air Program Status 03	Class: Synthetic Minor Chg:
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<u>Action Requested By</u>	<u>Address/Phone</u>	<u>Rec'd Date</u>
WiRO	910-395-3900	NA

Last Insp: 08/27/03	Action Date: 09/24/04	Next Insp: 09/30/05
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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: Inspect facility as scheduled	Signature: Scott Sanders 	Date: 09/29/04
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Dist: Yellow (Central Files)	Blue (Region)	White (Inspector)
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- Contact was made with Priti Mathur, EHS Specialist.
- 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. 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. This equipment is located in the GE Nuclear Energy section of the plant.

- 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),*

This equipment was not operating 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, Priti Mathur 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 that 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 not operating at the time of the inspection. This equipment has been dismantled and will be removed from the permit at renewal.

- 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 logbook 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 logbook.

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 Nuclear Energy, 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, 2004, indicates compliance with the charging rate for calendar year 2003. The maximum charge rate for the incinerator was 376 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. This process currently runs about four hours per week. 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 and has not operated in many years. 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 and the equipment has been dismantled. This process has not operated in a few years. This permit item will be removed from the permit at renewal. 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 an 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. Natural gas is currently being 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 four 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 57.3 total hours in 2003.

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

This generator was not operating during the inspection. It operated 61.2 total hours in 2003.

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

This generator was not operating during the inspection. It operated 51.7 total hours in 2003. This generator is exempt from permitting requirements and will be removed from the permit because it is below the cutoff (270 kW). Hours of use will still be tracked.

- 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 33.8 hours in 2003 and S40 operated 35.5 hours in 2003.

- 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 not operating during the inspection and operates very infrequently. 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*

The opacity reading for visible emissions was 0% at the time of the inspection. This process operates 24 hours per day, 7 days per week, and 50 weeks per year. The control devices have a control efficiency of 99%. Pursuant to the 1999 Emissions Inventory, this process emitted 1.39 pounds of Fluorides.

- 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)*

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. Pursuant to the 1999 Emissions Inventory, this process had zero emissions for 1999.

- 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. Sandblasting is currently being done infrequently and was last done in May. This process operated 84 hours in 2003. 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. Painting is being done infrequently and was last done in May. This process used 287 gallons in 2003. Pursuant to the 1999 Emission Inventory, the process emitted the following pollutants after controls in 1999: VOC - 0.22 tons. GNF will be requesting that this permit item be deleted at renewal. It is believed the emissions are below the required permitting threshold.

- 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. The opacity reading for visible emissions was 0% at the time of the inspection. Pursuant to the 1999 Emission Inventory, the process emitted the following pollutants after controls in 1999: Fluorides - 0.96 pounds; Ammonia - 0.39 tons.

- 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 scrubber (item t) listed directly below. This equipment can be removed from the permit at renewal because it is an inorganic storage tank and has a vapor pressure below the permitting threshold.

- 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%. 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. 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.

- 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)***

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The process has an operation schedule of 12 hours per day, 5 days per week, and 50 weeks per year (4000 hours total). The control device has a control efficiency 99.85%. 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. Pursuant to the 1999 Emission Inventory, this process emitted the following pollutant after controls in 1999: PM - 0.04 tons; Ammonia - 8.83 pounds.

*** 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, 2004. Global Nuclear Fuel did not exceed a charge rate greater than 376 pounds per hour for calendar year 2003. *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 170.2 hours in 2003.

- (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 69.3 hours in 2003.

- (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 content percentages are less than 0.05%, which indicates 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.

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*** 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.

Global Nuclear Fuel's computer keeps a status report on the minimum flow rate of each scrubber associated with the Hydrogen Fluoride system. Per calculations, 34.50 pounds of HF was emitted in 2003. 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 287 gallons were applied in 2003. 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 0.8 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 logbook that will be kept onsite and made available to the DAQ upon request.

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- 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 cleaning/calibration of all associated instrumentation.

A scrubber logbook 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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