



STATEMENT OF BASIS
Page 1 of 28
 BAQ Air Permitting Division

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|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

DATE APPLICATION RECEIVED: September 18, 2007, as amended

DATE OF LAST INSPECTION: Comprehensive evaluation performed on August 21, 2018. No violations of the Title V permit or unincorporated construction permits were observed.

FACILITY DESCRIPTION

The Savannah River Site (SRS) is a key Department of Energy industrial complex dedicated to the stewardship of the environment, the enduring nuclear weapons stockpile and nuclear materials. More specifically, the SRS processes and stores nuclear materials in support of the national defense and U.S. nuclear non-proliferation efforts. The site also develops and deploys technologies to improve the environment and treat nuclear and hazardous wastes left from the Cold War.

The SRS complex covers 198,344 acres, or 310 square miles encompassing parts of Aiken, Barnwell and Allendale counties in South Carolina, bordering the Savannah River. The site is owned by DOE and is managed and operated by Savannah River Nuclear Solutions, LLC (SRNS). Under the contract that went into effect August 1, 2008, SRNS is responsible for the site's nuclear facility operations; Savannah River National Laboratory; environment, safety, health and quality assurance; and most of the site's administrative functions. DOE has other prime contractors such as Savannah River Remediation, LLC (SRR) which is responsible for the liquid waste operations at SRS. Another contractor, Ameresco Federal Solutions for the Ameresco Biomass Cogeneration Facility (TV-0080-0144), has ongoing collocated activities that have required construction and operating permits.

PROJECT DESCRIPTION

The facility requests a renewal of their Title V application.

COLLOCATION DETERMINATION

There are several facilities that are potentially collocated with the Savannah River Site. Below is a table presented in the application describing each of the potentially collocated facilities:

| Facility | Air Permit Numbers | Proximity | Ownership/Common Control | Additional Information |
|--|--|--|--|---|
| Ameresco Biomass Cogeneration Facility (including K-Area and L-Area biomass boilers) | 0080-0144 | Located within boundaries of SRS | Property is Owned by the Department of Energy (DOE) | Steam generated at Ameresco facilities support SRS facilities. |
| Salt Waste Processing Facility (SWPF) | NA-Exempted via condition 7.B.3 of SRS's original Title V Operating permit | Located within boundaries of SRS | Property is Owned by the Department of Energy (DOE) | The purpose of SWPF is to process streams from other SRS facilities, especially those facilities operated by SRR. This is a support facility. |
| Research and Development (R&D) Activities performed at leased facilities within the Savannah River | NA-R&D activities are exempt from construction and operating permitting | In 2013 a determination was made that even though these facilities are not within the SRS boundary they were collocated (SRNS-J2000- | Personnel performing R&D activities at the Aiken country facilities are SRS personnel that share common employee benefits, health plans, | Research performed at these laboratories support the work at SRS. |



STATEMENT OF BASIS
Page 2 of 28
 BAQ Air Permitting Division

| | | | |
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| Facility | Air Permit Numbers | Proximity | Ownership/Common Control | Additional Information |
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| Research Campus maintained by Aiken County | | 2013-00248). The current guidance states, “[The collocation guidance] is intended to be a guide and not an exhaustive list of all possible scenarios. These determinations are made on a case-by-case basis regarding the existing situation at specific facilities.” | retirement funds and other administrative functions | |
| Three Rivers Solid Waste Authority Regional Landfill (Landfill) | 0080-0112 | The Landfill is within the SRS site boundary, but a fence separates the Landfill from the remainder of SRS. Public access to the Landfill is not allowed, but access is provided to member counties and approved commercial haulers. (http://www.trswa.org/landfill.shtml) | <ul style="list-style-type: none"> Landfill does not share a common workforce with SRS. Landfill is responsible for its own equipment, property, and pollution control devices. Landfill personnel do not share common employee benefits, health plans, retirement funds and other administrative functions The Landfill does accept waste from the SRS. However, SRS contributes only 1.3% of the total waste received (http://www.trswa.org/landfill.shtml) SRS could transport their waste to another permitted facility with little or no impacts to the Landfill or SRS. Landfill personnel are responsible for compliance with air quality control requirements at the Landfill. The DOE is not listed on the air permit for the Landfill. Easement has been provided to the Landfill for the use of the property. The Landfill does receive waste from the SRS. These are not agreements that impact control and operation of the Landfill. | The Landfill and SRS are not within the same industrial grouping. The Landfill is not a support facility for SRS since the SRS contributes far less than 50% of the waste being disposed at the Landfill and does not have operational control over the Landfill. Conclude not co-located based on SIC/NAICS codes or support. |



STATEMENT OF BASIS
Page 3 of 28
 BAQ Air Permitting Division

| | | | |
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Conclusion: Ameresco Biomass Cogeneration Facility, Salt Waste Processing Facility, and the Research and Development (R&D) Activities performed at leased facilities within the Savannah River Research Campus maintained by Aiken County are co-located facilities/activities. The Three Rivers Solid Waste Authority Regional Landfill is not a co-located facility with SRS. Simplistically speaking the Landfill is not dependent on the presence of SRS to perform their services/manufacture their products.

CHANGES SINCE LAST OP ISSUANCE

The following changes have been incorporated into the existing Title V permit since its issuance:

| RECORD OF REVISIONS | | | |
|----------------------------|---------------------|------------------|--|
| Revision Number | Final Revision Date | Type of Revision | Description of Change (Specific Parts, Sections, and Tables Revised or Added) |
| 1 | 7/3/2003 | AA | Replaced wording of conditions 4.B.18, 4.B.19, 4.B.20, 4.B.22 & 4.B.23 with "VOID" |
| 1 | 7/3/2003 | MM | Made the following changes: 1. Part 5.0a, Table 5.1: Voided unit ID A-001, Cyclone C-012, Baghouse B681 and unit IDA-012 (moved to Attachment B); 2. Part 5.0a, Table 5.2: Voided ID C012 & B681; 3. Part 5.0a, Table 5.3: Put "VOID" in the table header and beside the equipment description; 4. Removed Part 5.0a, Table 5.11 and renamed Table 5.12 as Table 5.11; 5. Part 6.0a, Table 6.1: Removed all references to IDs A-001 & A-012 and replaced the wording of condition 6.B.13 with "VOID"; 6. Part 5.0m, Table 5.1: Voided unit ID M-002; 7. Part 5.0m, Table 5.2: Placed "VOID" next to the equipment description for equipment ID 588M; 8. Part 5.0m, Table 5.4 & Part 6.0m, Table 6.1: Removed any reference to unit ID M-002; 9. Part 5.0n, Table 5.1: Voided unit IDs N-002, N-025, N-026 & N-028; 10. Part 5.0n, Table 5.3: Placed "VOID" next to the equipment description for equipment ID 420N; 11. Part 5.0n, Table 5.8: Placed "VOID" next to the equipment description for equipment IDs 925H, 926H & 417N; 12. Part 5.0n, Table 5.10 & Part 6.0n, Table 6.1: Removed any reference to unit IDs N-002, N-025, N-026 & N-028 and also deleted reference to these units in condition 6.B.5; 13. Attachment B, Insignificant Activities (A-Area): Inserted ID 85DA (formerly unit ID A-012) into the table as exempt based on emission level. |
| 2 | 9/24/2003 | AA | Made the following changes: 1. Changed A-Area Insignificant Activities list ID "747-A" to "85FA" (was typo); 2. Changed diesel fuel usage table at end of G-Area Insignificant Activities list to reflect the 30kW generator as "701-12G" to correspond with the listing for activity 099G shown in the main table listing; 3. Changed diesel fuel usage table at end of H-Area Insignificant Activities list to reflect the 300kW generator as "234-H" to correspond with the listing for activity 505H shown in the main table listing; 4. Changed N-Area condition 6.B.5 to make corrections as well as remove previously voided equipment from the permit: (a) GE0026 was assigned a building ID of "SRO 1308" instead of "N/A" (b) GE0004 was assigned a building ID of "SRO 7850" not "SRO 7856" (c) GE0002, GE0006, GE0007, GE0008, GE0019, GE0027, GE0034 & GE0035 were removed from this list because they are no longer in use or on site; 5. Removed generator 292-H from the diesel fuel usage table at the end of the H-Area Insignificant Activities list; 6. Removed the duplicate generator listing for building ID 254-7F in the F-Area Insignificant Activities list. |



STATEMENT OF BASIS
Page 4 of 28
 BAQ Air Permitting Division

| | | | |
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| 2 | 9/24/2003 | MM | Made the following changes: 1. As they pertain to the issuance of construction permit #0080-0041-G-CT, the following was changed in G-Area of the main permit: (a) Added new unit ID G-003 to Table 5.1; (b) Changed the installation date of Equipment ID 288G in Table 5.3 to "2/2001**" and added footnote at bottom of table; (c) Removed Equipment ID 287G from Table 5.3; (d) Created new Table 5.4 to describe new equipment associated with new Unit ID G-003; (e) Renumbered Table 5.4 as Table 5.5 and changed unit ID reference from "G-001 & G-002" to "G-001 thru G-003"; (f) Added new row to Table 6.1 to reflect new monitoring associated with new Unit ID G-003; (g) Renumbered condition 6.B.5 as 6.B.8, and added new conditions 6.B.5, 6.B.6 & 6.B.7 that correspond to new Unit ID G-003 information now in Table 6.1; 2. Removed all reference to Units N-016, N-019 & N-027, to include the following changes: (a) Placed "VOID" next to relevant Unit Descriptions in Table 5.1; (b) Placed "VOID" next to the equipment descriptions for IDs 413N & 416N in Table 5.5; (c) Placed "VOID" next to the equipment description for ID 924H in Table 5.6; (d) Changed the 3 rd row of Table 5.10 and 2 nd , 4 th , and 6 th rows Table 6.1 of the Unit ID column from the old designation of "N-003 thru N-024, N-027, N-029 & N-030" to the new designation of "N-003 thru N-015, N-017, N-018, N-020 thru N-024, N-029 & N-030"; (e) Removed rows from the diesel fuel usage table contained within condition 6.B.5, that begin with SRS IDs GE0022, GE0025 & GE0038; 3. Removed all reference to Unit F-010 to include the following changes: (a) Placed "VOID" next to relevant Unit Description in Table 5.1; (b) Placed "VOID" next to the equipment descriptions for ID 17JF in Table 5.9; (c) Changed the 3 rd row of Table 5.10 from the old designation of "F-005 & F-006, F-008 thru F-010" to the new designation of "F-005 & F-006, F-008 & F-009"; (d) Changed the 4 th row of Table 6.1 of the Unit ID column from the old designation of "F-004 & F-008 thru F-010" to the new designation of "F-004, F-008 & F-009"; (e) Removed "& F-010" from the 5 th row of Table 6.1 of the Unit ID column; (f) Removed row from the diesel fuel usage table contained within condition 6.B.8, that begins with SRS ID SE0023. |
| 3 | 2/2/04 | SM "Non-Area" Changes | 1. Changed the 3 rd line of the mailing address on page 1 from "Environmental Protection Department" to "Environmental Support Section"; 2. Changed 2 nd line of billing address in Part 1.0(D) from "Environmental Protection Department" to "Environmental Support Section"; 3. Changed the wording of condition 4.B.9 as follows: (a) "Category I sources" was changed to "Potential Impact Category (PIC) 1 & 2 sources", and (b) removed from the listing of sources from this condition ALL EXCEPT the following: H-Canyon, HB Line, F-Canyon & FB Line; 4. Changed the word "VOID" in conditions 4.B.18, 4.B.19, 4.B.20, 4.B.22 & 4.B.23 to "<Void>"; 5. Throughout all "Area" sections of the main permit, as well as in Attachment B, changed the formatting of all appropriate tables to remove vertical merging. |



STATEMENT OF BASIS
Page 5 of 28
 BAQ Air Permitting Division

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| 3 | 2/2/04 | SM A-Area Changes | <p>1. In Table 5.1, added "VOID" before the unit descriptions for Unit IDs A-002, A-003 & A-004 and also before the control device descriptions for the same Unit IDs; 2. Removed the "***" footnote below Table 5.1, as it was no longer necessary; 3. In table 5.2, deleted all information rows beginning the following control device IDs: (a) VOID-C012; (b) VOID-B681; (c) H273 thru H337; (d) H352; (e) H353 and H354; (f) H760 and H761; (g) H339; (h) H341; (i) H344; (j) H342 and H345; (k) H347 and H348; (l) H349, H350 and H355 thru H364; (m) H440 thru H448; (n) H449; (o) H450; (p) H455 thru H457, H464 and H465; (q) H482 thru H485; (r) H486; (s) H487 thru 489; (t) H491 thru H493, H495 and H496; (u) H662, H665 and H667; (v) H681, H683, H686 and H688; (w) H702 and H704; (x) H721; (y) H723, H725, H727, H729, H731, H733, H735, H737, and H739; (z) P027 and P037; (aa) P047 and P051; (bb) P052; (cc) P054; (dd) P104 thru P110, P115 and P116; (ee) N004; (ff) H370; (gg) H371 and H372; (hh) H373; (ii) H374; (jj) H375 and H436, and; (kk) P129 thru P148; 4. Changed Tables 5.3, 5.4, 5.5 & 5.6 unit ID descriptions to "<Void>" and removed the respective tables below them; 5. Added back previously removed Table 5.11 header and changed the description to "<Void>"; 6. Renumbered Table 5.11 to Table 5.12, and removed the last line of this table which previously referenced IDs A-002 thru A-004; 7. Removed all relevant monitoring and reporting requirements for Unit IDs A-002 thru A-004 from Table 6.1; 8. Removed the wording of conditions 6.B.1 through 6.B.6 and replaced each condition with the word "<Void>"; 9. Changed the word "VOID" in previous condition 6.B.13 to the word "<Void>"; 10. Added the units previously referenced as A-002, A-003 and A-004 to the A-Area Insignificant Activities list, with their basis for exemption being "R&D."</p> |
| 3 | 2/2/04 | SM F-Area Changes | <p>1. In Table 5.1, added "VOID" before the unit descriptions for Unit ID F-001 and also before the control device descriptions for the same Unit ID; 2. In table 5.2, deleted all information rows beginning the following control device IDs: (a) H998; (b) H999; (c) P001; (d) P002; (e) P003; (f) P004; 3. Changed Table 5.3 unit ID description to "<Void>" and removed the table below the header; 4. Changed 1st row of Table 5.10 of the Unit ID column from "F-001 thru F-003" to "F-002 & F-003"; 5. Changed 1st and 2nd rows of Table 6.1 of the Unit ID column from "F-001 thru F-003" to "F-002 & F-003."</p> |



STATEMENT OF BASIS
Page 6 of 28
 BAQ Air Permitting Division

| | | | |
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| 3 | 2/2/04 | SM H-Area Changes | <p>1. In Table 5.1, added "VOID" before the unit descriptions for Unit IDs H-005, H-006, H-007, H-008, H-009 & H-013 and also before the control device descriptions for the same Unit IDs (except ID H-008, which had no control device; 2. In table 5.2, deleted all information rows beginning the following control device IDs: (a) D026; (b) H775; (c) H776; (d) P101; (e) P102; (f) D032; (g) D044; (h) P058; (i) P059; (j) P060; 3. Changed Tables 5.6, 5.7, 5.8, 5.9, 5.10 & 5.14 unit ID descriptions to "<Void>" and removed the respective tables below them; 4. Changed 1st row of Table 5.20 of the Unit ID column from "H-001 thru H-002, H-005 thru H-010, H-012 & H-013" to "H-001, H-002, H-010 & H-012"; 5. Removed the ID reference of "H-005 thru H-008" from the 2nd row of Table 5.20 of the Unit ID column; 6. Changed 3rd row of Table 5.20 of the Unit ID column from "H-003 thru H-004, H-009, H-011 thru H-013, H-019 thru H-021" to "H-003 thru H-004, H-011, H-012, H-019 thru H-021"; 7. Changed 1st and 3rd rows of Table 6.1 of the Unit ID column from "H-001, H-002, H-009, H-010^ & H-013" to "H-001, H-002, & H-010^"; 8. Removed the 2nd row of Table 6.1, as H-005 thru H-008 are now VOID; 9. Removed the 8th row of Table 6.1, as Unit ID H-009 is now VOID; 10. Removed the row containing the performance testing requirement for Unit ID H-009 in Table 6.1, as this Unit ID is now VOID; 11. Removed the wording of the following conditions and replaced each condition with the word "<Void>": 6.B.8, 6.B.37 & 6.B.38; 12. Removed ID 54DH from the H-Area Insignificant Activities list; 13. Added ID 34BH, the 242-25H RHLWE Test Cell to the Insignificant Activities list with the basis for exemption being "Emission Level"; 14. Changed the size of ID 50FH from 7,600,000 gallons to 562 gallons.</p> |
| 3 | 2/2/04 | SM N-Area Change | <p>1. Changed Table 5.8 unit ID description to "<Void>" and removed the table below it.</p> |
| 3 | 2/2/04 | SM S-Area Changes | <p>1. In Table 5.1, added "VOID" before the HEPA Filters and the Sand Filter; 2. In Table 5.2, deleted all information rows beginning the following control device IDs: (a) H016; (b) H965; (c) N001; 3. In Table 5.3, removed all control device IDs for Equipment ID 270S and replaced with "N/A"; 4. Added "*" N/A=Not Applicable" just below Table 5.3; 5. In Table 6.1, removed the rows in the table for all monitoring and reporting requirements for S-001 with the exception of the "Condenser Performance" requirement; 6. Removed the "***" footnote below Table 6.1, as it was no longer necessary; 7. Removed the wording of conditions 6.B.1 through 6.B.9 and replaced each condition with the word "<Void>"; 8. Added the following IDs with accompanying descriptions to the S-Area Insignificant Activities list: 278S, 488S, 085S, 129S, 286S, 287S, 289S & 295S (all had a basis for exemption of "Emission Level").</p> |
| 3 | 2/2/04 | SM Attachme nt A Changes | <p>Facility remodeled and, where the emission rates were higher than previously indicated, successfully continued to demonstrate compliance with Standards 2 & 8, respectively (in accordance with condition 4.B.2), thus triggering the following administrative changes were incorporated into Attachment A: 1. The value for NOx for emission point S-DP0007 was changed from "13.600" to "23.635"; 2. The value for Total PM for emission point S-DP0007 was changed from "0.000" to "0.002"; 3. The value for Mercury for emission point S-DP0007 was changed from "0.0200" to "0.0168"; 4. The value for Nitric Acid for emission point S-DP0007 was changed from "0.0603" to "0.0569"; 5. The value for Nitric Acid for emission point S-DP0009 was changed from "0.1043" to "0.0057."</p> |
| 3 | 2/2/04 | Group MM | <p>Several MM's & AA's were grouped together affecting the following changes to the permit: 1. In part 5.0f, Table 5.1, Unit IDs F-008 & F-009 were changed to "VOID", as</p> |



STATEMENT OF BASIS
Page 7 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
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| | | | <p>they are now Insignificant Activities; 2. Removed Table 5.9 from Part 5.0f, and changed the description in the heading of the table to "<Void>"; 3. Removed the "***" footnote below Table 5.9 in Part 5.0f; 4. Removed all references to Unit IDs F-008 & F-009 from Table 5.10 in Part 5.0f; 5. Removed fuel oil usage and visible emissions requirements for units F-008 & F-009 from Table 6.1 of Part 5.0f; 6. Removed reference to Unit IDs F-008 & F-009 from condition 6.B.8 in Part 6.0f; 7. In Part 5.0g(D), changed the reference of Table 5.4 to Table 5.5; 8. In Part 6.0g, condition 6.B.7, changed the referenced condition from "condition 9" to "condition 6"; 9. In Part 5.0n, Table 5.1, changed Unit IDs N-004, N-005 & N-011 to "VOID"; 10. Added "VOID" to the equipment descriptions of the following tables/row numbers: Table 5.3 - Row 3, Table 5.4 - Rows 1 & 7; 11. In Table 5.10, 4th row, changed the Unit IDs referenced from "N-003 thru N-015..." to "N-003, N-006 thru N-010, N-012 thru N-015..."; 12. In Table 6.1, Rows 2, 4 & 6, changed the Unit IDs referenced from "N-003 thru N-015..." to "N-003, N-006 thru N-010, N-012 thru N-015..."; 13. Removed reference to Unit IDs N-004, N-005 & N-011 from condition 6.B.5 in Part 6.0n; 14. On the A-Area Insignificant Activities list, removed ID 006A, as it has been removed from service, and added the following IDs to the bottom of the list: 04GA, 95FA, 96FA & 97FA; 15. Removed reference to ID 006A from the A-Area Insignificant Activities fuel usage list; 16. On the B-Area Insignificant Activities list, removed ID 107B, as it has been removed from service, and also removed reference to this ID from the fuel usage list; 17. On the D-Area Insignificant Activities list, removed ID 181D, as it has been removed from service, and entirely removed the fuel usage table from below the list, as there are no longer any exempt diesel units in D-Area; 18. On the F-Area Insignificant Activities list, removed IDs 166F & 311F, as they have been removed from service, and added the following IDs to the bottom of the list: 851F & 861F (formerly Unit IDs F-008 & F-009); 19. Removed reference to IDs 166F & 311F from the F-Area Insignificant Activities fuel usage list and added references to IDs 851F & 861F; 20. On the H-Area Insignificant Activities list, removed IDs 355H, 15EH & 14EH, as they have been removed from service, and added ID 57FH to the bottom of the list; 21. Removed reference to IDs 355H, 15EH & 14EH from the H-Area Insignificant Activities fuel usage list and added references to ID 57FH; 22. On the N-Area Insignificant Activities list, removed IDs 320N, 375N, 25CN & 24CN, as they have been removed from service; 23. On the A-Area Insignificant Activities list, removed ID 64FA, as it has been removed from service; 24. On the D-Area Insignificant Activities list, removed ID 197D, as it has been removed from service; 25. On the F-Area Insignificant Activities list, removed IDs 08EF & 66DF, as they have been removed from service; 26. Made the following administrative corrections as they pertain to Attachment A: a. Delete VOC emission rate for stack H-TP0001; b. Change VOC emission rate for H-TP0025 from 0.617 lb/hr to 0.827 lb/hr; c. Change stack reference for NOx from H-TP0001 to H-TP0025; d. Change stack reference for PM-10 from H-TP0001 to H-TP0025; e. Change stack reference for TSP from H-TP0001 to H-TP0025; f. Change stack reference for Nickel from H-TP0001 to H-TP0025; 27. In Attachment B, changed source descriptions for Unit ID 849H & 871H; 28. Consolidated motor pool sources and made changes in accordance with operational flexibility request dated 11/17/2003.</p> |
| 4 | 8/17/04 | Group MM | <p>Part 5.0a, Table 5.1 – Void IDs A-010 & A-011 Part 5.0a, Table 5.10 – Void Equipment IDs 574A & 575A Part 5.0a, Table 5.12 – Removed all references to IDs A-010 & A-011 Part 6.0a, Table 6.1 – Removed all references to IDs A-010 & A-011 Part 6.0a, Condition 12 – Removed condition and listed <Void></p> |



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Page 8 of 28
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| | | | <p>Part 5.0b, Table 5.1 – Void IDs B-004 & B-005 Part 5.0b, Table 5.3 – Void Equipment IDs 114B & 115B Part 5.0b, Table 5.4 – Removed all references to IDs B-004 & B-005 Part 5.0b, Condition 3 – Removed condition and listed <Void> Part 6.0b, Table 6.1 – Removed all references to IDs B-004 & B-005 NSPS Kb requirement. Part 6.0b, Condition 2 – Removed condition and listed <Void></p> <p>Part 6.0c, Condition 2 – Changed the approved method in determining the VOC emissions in unit C-001 to a Modified Method 18.</p> <p>Part 5.0f, Table 5.1 – Void IDs F-004, F-005, & F-006 Part 5.0f, Table 5.6 Void equipment ID 911F Part 5.0f, Table 5.7 – Void equipment IDs 801F & 811F Part 5.0f, Table 5.10 – Removed all references to IDs F-004, F-005, & F-006 Part 5.0f, Condition 2 – Removed condition and listed <Void> Part 6.0f, Table 6.1 – Removed all references to IDs F-004, F-005, & F-006 Part 6.0f, Conditions 7 & 8 – Removed conditions and listed <Void></p> <p>Part 5.0g, Table 5.1 – Void ID G-001 Part 5.0g, Table 5.2 – Void equipment ID 169G Part 5.0g, Table 5.5 – Removed all references to ID G-001 Part 6.0g, Table 6.1 – Removed all references to ID G-001 Part 6.0g, Condition 1 – Removed condition and listed <reserve> Part 6.0g, Conditions 3 & 6 – Changed the approved method in determining the VOC emissions in unit G-002 & G-003 to a Modified Method 18.</p> <p>Part 5.0h, Table 5.1 – Void IDs H-003, H-004, H-011, H-012, H-014, & H-021 Part 5.0h, Table 5.2 – Void control device P055 Part 5.0h, Table 5.5 – Void equipment IDs 86EH & 88EH Part 5.0h, Table 5.12 – Void equipment ID 87DH Part 5.0h Table 5.13 – Void equipment IDs 72DH, 73DH, 74DH, & 75DH Part 5.0h, Table 5.15 – Void equipment ID 618H Part 5.0h, Table 5.19 – Void equipment ID 56FH Part 5.0h, Table 5.20 – Removed all references to IDs H-003, H-004, H-011, H-012, H-014, & H-021 Part 6.0h, Table 6.1 – Removed all references to IDs H-003, H-004, H-011, H-012, H-014, & H-021 Part 6.0h Conditions 7 – Removed condition and listed <Void></p> <p>Part 5.0k Table 5.1 – Void IDs K-003 & K-004 Part 5.0k, Table 5.2 – Void Equipment IDs 238K & 239K Part 5.0k, Table 5.3 – Removed all references to IDs K-003 & K-004 Part 5.0k, Condition 3 – Removed condition and listed <Void> Part 6.0k, Table 6.1 – Removed all references to IDs K-003 & K-004 Part 6.0k, Condition 2 – Removed condition and listed <Void></p> <p>Part 5.0m, Table 5.1 – Void IDs. M-001 & M-004 Part 5.0m, Table 5.2 – Void Equipment IDs 587M & 590M Part 5.0m, Table 5.3 – Added Equipment IDs 611M & 612M Part 5.0m, Table 5.4 – Removed all references to IDs M-001 & M-004 Part 6.0m, Table 6.1 – Removed all references to IDs M-001 & M-004 Part 6.0m, Condition 1 – Removed IDs M-001 & M-004 from the condition requirements Part 6.0m, Conditions 2 & 5 – Changed the approved method in determining the VOC emissions in unit M-003, M-005, M-006, & M-007 to a Modified Method.</p> <p>Attachment B (A Area) – Void the following IDs: 160A, 161A, 162A, & 76FA and added 574A & 574B along with their respective fuel usage limit.</p> <p>Attachment B (B Area) – Added equipment IDs 114B & 115B</p> <p>Attachment B (F Area) – Added equipment IDs 801F, 811F, & 911F (along with 911F'sr respective fuel usage limit)</p> <p>Attachment B (G Area) – Void the following IDs: 094G, 103G, 088G, & 308G and added 169G along with its respective fuel usage limit</p> <p>Attachment B (H Area) – Added equipment IDs 86EH, 88EH, 87DH, 72DH, 73DH, 74DH, 75DH, 618H, & 56FH (along with their respective fuel usage limit)</p> <p>Attachment B (K Area) – Added equipment IDs 238K & 239K</p> |



STATEMENT OF BASIS
Page 9 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatima Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| RECORD OF REVISIONS | | | |
|----------------------------|----------------------------|-------------------------|--|
| Revision Number | Final Revision Date | Type of Revision | Description of Change (Specific Parts, Sections, and Tables Revised or Added) |
| 4 | 8/17/04 | AA | Part 6.0a, Condition 11 – Removed condition since it is no longer applicable to any IDs listed in A Area Part 5.0l, Table 5.3 – Correct typographical error listing control device as N/A instead of D068 & P128 Part 6.0n, Table 6.1 – Correct typographical error on condition sited from 6.B.4 to 6.B.3 Attachment A – Updated modeled emission rates Attachment B – Correct typographical error on ID 150H from 245-H to 211-H |
| 5 | 11/17/04 | Group MM | Part 5.0c, Table 5.1 – Void ID C-001 Table 5.2 – Void equipment ID 224C Table 5.3 – Removed all references to ID C-001 Condition 1 – Removed condition and listed <Void> Part 5.0f, Table 5.5 – Void equipment IDs 02EF, 04FE, 07, EF, 38GF, 05, EF, 06EF, & 03EF Part 5.0g, Table 5.1 – Void IDs G-002 & G-003 and add G-004 Table 5.3 – Void equipment 288G & 289G Table 5.4 – Void equipment 312G Table 5.5 – Add ID G-004 & associated equipment Table 5.6 – Renamed table number, removed all references to IDs G-002 & G-003, and added G-004. Condition 1 – Removed all references to IDs G-002 & G-003, and added G-004 Part 5.0l, Tables 5.1, 5.2, & 5.3 – Void IDs L-001, D068, P128, & 193L Table 5.4 – Remove emission limitations to Unit ID L-001 and corresponding conditions Part 5.0m, Table 5.1 – Void ID M-003 Table 5.2 – Void equipment ID 589M Table 5.4 – Remove emission limitations to Unit ID M-003 and corresponding conditions Part 6.0c, Table 6.1 – Removed all references to ID C-001 Conditions – Removed conditions and listed <reserve> Part 6.0g, Table 6.1 – Removed all references to IDs G-002 & G-003, and added G-004's monitoring and reporting Conditions – Removed all conditions that applied to IDs G-002 & G-003 (2-8), and added G-004's conditions (1-6) Part 6.0l, Table 6.1 – Remove monitoring and reporting requirements for Unit ID L-001 and corresponding conditions Part 6.0m, Table 6.1 – Remove monitoring and reporting requirements for Unit ID M-003 and corresponding conditions Attachment B (A Area) – Add 781-A Engineered Equipment & Systems Building Laboratory Attachment B (A Area) – Void IDs 775A, 033A, 72FA, 73FA, & 85DA Attachment B (F Area) – Void IDs 422F, 165F, 87FF, 62EF, 67CF, & 52DF Attachment B (H Area) – Void equipment IDs 68DH, 67DH, 80DH, 81DH, 82DH, 26AH, 241H, 612H, 457H, 624H, 18DH, & 274H Attachment B (N Area) – Void equipment IDs 091N, 321N, 262N, 270N, 369N, 236S, 527N, 528N, 529N, 530N, 532N, 533N, 520N, 56CN, 60CN, 91BN, 477N, 478N, 507N, 98BN, 04CN, 05CN, 06CN, 11CN, 98CN, 283N, 286N, 292N, 291N, 493N, 95CN, 298N, 300N, 974N, 91CN, 437N, 295N, 203N, & 369N Attachment B (S Area) – Void IDs 221S & 262S |
| 5 | 11/17/04 | AA | Attachment B (E Area) – Changed ID 150E to 152E (F Area) – Remove IDs 80FF & 79FF (tanks do not exist) and changed IDs 851F to 85IF and 861F to 86IF (G Area) – Changed ID 145G to 245G (H Area) – Changed IDs 04AH (619-H Underground Diesel Fuel Tank) to 61EH (619-H Emergency Diesel Tank) & 512H to 79DH (N Area) – Changed IDs SH014 to SH14 & one of the 525Ns to 524N (S Area) – Removed ID 129S (221-S Vitrification Process Formic Acid Solution Tank) listed twice & changed 259S to Chamber #1 & #2. |



STATEMENT OF BASIS
Page 10 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| RECORD OF REVISIONS | | | |
|----------------------------|----------------------------|-------------------------|--|
| Revision Number | Final Revision Date | Type of Revision | Description of Change (Specific Parts, Sections, and Tables Revised or Added) |
| 6 | 12/16/04 | AA | Condition g6.B.1 & g6.B.2 were updated to match c/p G-CU-R1. Condition g6.B.3 was changed so the facility will not have to send in the same approved sampling protocol each time a unit goes on line |
| 7 | 3/1/05 | MM | Part 1.0 – Environmental Contact change. Part 5.0f – Void the following equipment: 66AF, 84CF, 82CF, 81CF, 74CF, 43CF, 42CF, 41CF, 80CF, 83GF, 84GF, 85GF, & 86GF. Attachment B (H Area) – Add a portable 200-H Emergency Diesel Generator #2 (900 kW & < 250 hr/yr) [12GH] with a fuel limit of 16,900 gallons. Attachment B – (F Area) – Void the following equipment: 08CF, 09CF, 51EF, 573F, 63EF, 65CF, 66CF, 67EF, 69EF, 744F, 745F, 746F, & 908F. |
| 8. | 11/22/05 | SM | Condition 4.B.25 From: ... To ensure compliance with the annual consumption limit specified below, SRS must refuel each unit at least once per calendar year during the last quarter of each year. Fuel oil sulfur content for these fuels shall be less than or equal to 0.5% percent by weight. Acceptable fuel oil certification can be ensured by following Department guidance entitled “Guidance for Fuel Oil Certifications” issued on May 19, 2000 and ... To: ... To ensure compliance with the annual consumption limit specified below, SRS must refuel each unit at least once during the annual permit reporting year, or for those units with infrequent or minimal annual operations, the unit must be refueled when the tank level decreases to below 75%, as determined from an appropriate measurement device, e.g., installed tank level gauge, sight glass, float gauge, or an incremented dip stick. For any unit whose tank level did not decrease below 75% and was not refueled during any given 12 month running reporting period, the facility operator must report the approximate tank level in percent (75% to 100%) biannually in September and March. Fuel oil sulfur content for these fuels shall be less than or equal to 0.5% percent by weight. Acceptable fuel oil certification can be ensured by following Department guidance entitled “Guidance for Fuel Oil Certifications” issued on August 12, 2004 and ... |
| 8. | 11/22/05 | MM | F-Area Voided out Unit F-007 from Tables 5.1, 5.8 & 5.10 (Equipment 87GF-Nitric Acid storage Tank 35) G-Area Void out Insignificant Activity 053G, 701-6G Diesel Generator Add Insignificant Activity 327G, 701-20G Emergency Diesel Generator Add installation date to equipment ID 312G. H-Area Add Insignificant Activity 58FH, 254-21H Diesel Fuel Tank N-Area Table 5.1 – Voided out all IDs except ID N-001 & N-020 and added N-031 Voided out all equipment in Tables 5.3, 5.4, 5.5, 5.7, & 5.9 and added Table 5.10 Updated Table 6.1 to Reflect the Changes in N-Area Listed Above Add Attachment D to list out the Diesel Equipment. Updated Condition N6.B.5 |
| 8 | 11/22/05 | AA | Updated condition 4.B.5. |



STATEMENT OF BASIS
Page 12 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| RECORD OF REVISIONS | | | |
|----------------------------|----------------------------|-------------------------|--|
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| 11. | 1/8/07 | MM | Updated Table 5.1 from F-Area: VOIDED Control Device N006 from EU F-002; VOIDED EU F-003 and Control Device IDs H709, H710, H783 and N006 VOIDED from Table 5.2 F-Area: Control Device IDs N006, H709, H710, H783 VOIDED from Table 5.4 F-Area EU F-002: Equipment IDs 44CF, 78CF, and 75CF VOIDED Table 5.5 F-Area EU-F-003 Updated Part 5.0f, Section D, Table 5.10: Removed reference to Unit ID F-003 Updated Part 6.0f, Section A, Table 6.1: Removed reference to Unit ID F-003 Updated Part 6.0f, Section B: Corrected typographical errors in condition numbers, changed from f5.E.1 through f5.E.9 to f6.B.1 through f6.B.9 Updated Part 5.0 and 6.0 L-Area: Corrected typographical errors in section numbers, changed from 5.0e and 6.0e to 5.0l and 6.0l to reflect proper area designation VOIDED from Attachment B – F-Area Insignificant Activities: ID 743F VOIDED from Attachment D – N-Area Mobile Diesel Equipment Pool: Equipment ID 412N and Equipment ID 2130 |
| 12 | 9/4/07 | Group MM | VOIDED from Attachment B – N-Area Insignificant Activities: ID 105N Removed from Attachment B – A-Area Insignificant Activities: ID 39GA Relocated ID 39AG from Attachment B to Attachment D. |
| 12 | 9/4/07 | AA | Condition 4.B.26 – Changed the reporting address to the Division Director of Air Toxics, Emissions Inventory and Modeling. Condition f6.B.9 – Changed the reporting address to the Division Director of Air Toxics, Emissions Inventory and Modeling. Condition h6.B.36 – Changed the reporting address to the Division Director of Air Toxics, Emissions Inventory and Modeling. |
| 13 | 12/11/07 | Group MM | VOIDED from Table 5.1 N-Area: Unit ID N-020 VOIDED Table 5.6, N-Area Updated Part 5.0n, Section D, Table 5.11 – Removed references to Unit ID N-020 Condition n5.E.2 – Removed reference to Unit ID N-020 Updated Part 6.0n, Section A, Table 6.1 – Removed references to Unit ID N-020 Condition n6.B.2 – Voided condition as equipment has been removed Condition n6.B.5 – Removed reference to GE0026 (which is Unit ID N-020) VOIDED from Attachment B – D-Area Insignificant Activities: ID 089D VOIDED from Attachment B – F-Area Insignificant Activities: ID 394F |

AA = Administrative Amendment MM = Minor Modification SM = Significant Modification

The following activities have occurred since the last Title V permit revision:

- 09/18/07 Received renewal application.
- 03/03/08 Administrative Amendment to increase PCB modeled emission rates.
- 04/11/08 Minor modification for the removal of Emission Unit ID A-007 (ESH-EMS-2008-00057).
- 04/18/08 Issued exemption for the Waste Solidification Building in F-Area. Request received 3/17/08 (ESH-EMS-2008-00047).
- 05/28/08 Approved intermittent use of permitted diesels for electrical generation (ESH-EMS-2008-00082) request received 05/19/08.
- 05/29/08 Submitted a revision to the facility's air dispersion model.
- 06/13/08 Minor modification to add a mobile diesel generator (11EN) to the mobile diesel equipment pool (Emission Unit ID N-031) (ESH-EMS-2008-00101).



STATEMENT OF BASIS
Page 13 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 07/09/08 Minor Modification requesting incorporation of construction permit 0080-0041-A-CG into the operating permit (ESH-EMS-2008-00120).
- 07/31/08 Minor Modification requesting incorporation of construction permit 0080-0041-A-CF into the operating permit (ESH-EMS-2008-00138).
- 07/31/08 Administrative Amendment changing operational control of the permit (ESH-EMS-2008-00142).
- 08/01/08 Change of RO from Patricia Allen and Pat Padezanin to Anthony Umek.
- 08/29/08 Issued approval for a temporary test of the Tank 18/19 High Pressure Liquid Jetting Pump.
- 09/10/08 Issued revised construction permits 0080-0041-A-CF-R1 and 0080-0041-A-CG-R1.
- 09/11/08 Added Jeannette Hyatt as an RO to the facility.
- 11/20/08 Administrative Amendment changing contact information. Minor modification to delete Emission Unit IDs A-006 and A-008. Minor modification deleting equipment ID 109B from the Insignificant Activities List (SRNS-J220-2008-00039)
- 01/07/09 Addition of 323G to Emission Unit ID G-004 per permit conditions.
- 02/17/09 Minor modification to delete four F-Area emergency diesels (046F, 144F, 190F, 44EF) from the insignificant activities list (SRNS-J220-2009-00023).
- 02/27/09 Minor modification to delete Emission Unit ID K-001 (SRNS-J220-2009-00028).
- 03/02/09 502(b)10 to replace emergency diesel 103A with 75GA (SRNS-J220-2009-00031).
- 03/13/09 Issued exemption for the temporary Tall Tower Tracer Study. Request received 03/09/09.
- 03/16/09 Administrative Amendment to change environmental contact information. (SRNS-J220-2009-00039).
- 03/16/09 Administrative Amendment to correct typo on Page 45 - Table 5.5 (Stack ID equipment 224C, 288G, 289G, 312G and 589M)
- 04/23/09 Issued Synthetic Minor Construction Permit 0080-0041-F-CO.
- 04/28/09 Administrative Amendment to add 20,000 gallon diesel tank in P-Area to the insignificant activities list. (SRNS-J220-2009-00068).
- 05/13/09 Administrative Amendment to add the Mobile Plutonium Facility Research (ID 76GA) activities to the insignificant activities list (SRNS-J220-2009-00074).
- 05/29/09 Submitted operational ranges for 0080-0041-CG ESP Operation (SRNS-J220-2009-00083).
- 07/16/09 Administrative Amendment to increase hours limitation of emergency diesels (911F, 851F, and 861F) in F-Area from 250 hours to 500 hours consistent with current regulations. F-Area fuel cap remains the same (SRNS-J220-2009-0110).
- 07/31/09 502(b)10 to replace emergency diesel 75GA with 79GA (SRNS-J220-2009-00122).
- 08/17/09 Administrative Amendment to add 20,000 gallon diesel tank in C-Area. (SRNS-J220-2009-00138) to the insignificant activities list.
- 10/23/09 Administrative Amendment to add 20,000 gallon diesel tank and 10 insignificant evaporators in P-Area. (SRNS-J220-2009-00158).
- 10/23/09 Request to add Kevin Kostelnik as a Responsible Official (RO).
- 11/13/09 502(b)10 to add 20,000 gallon diesel tank and 10 insignificant evaporators in P-Area (SRNS-J220-2009-00179).
- 11/13/09 Administrative Amendment to remove a mobile diesel generator (11EN) from Unit ID N-031 (SRNS-J220-2009-00178).
- 02/18/10 502(b)10 to add 15 SVE wells in M-Area (SRNS-J220-2010-00026).
- 07/07/10 Submittal of a CAM plan for Equipment IDs B011, B012, and B013.
- 09/07/10 502(b)10 to change the hour limit on the F-Area Emergency diesel (923F) from 250 hours to 500 hours.



STATEMENT OF BASIS
Page 14 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatima Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 09/27/10 502(b)10 to change the hour limit on the F-Area Emergency diesel (718F) from 250 hours to 500 hours.
- 11/15/10 Minor Modification to remove Emission Unit ID K-002 (SRNS-J2220-2010-00202).
- 11/19/10 502(b)10 to remove Equipment ID 463-N from Emission Unit N-031 and add it to the insignificant activities (SRNS-J2220-2010-00206).
- 12/13/10 502(b)10 to remove Insignificant Activity ID 12GH – 200H Emergency Diesel Generator #2 (900 kW) from service.
- 03/09/11 502(b)10 to adding two ethanol dispensing fuel stations (82GA and 344G) and to remove Insignificant Activity IDs 374N and 544N – 1000 gallon fuel tanks; and Insignificant Activity ID 372N – 0.937 MMBTU/hr space heater.
- 03/25/11 502(b)10 to add three emergency diesels to the insignificant activities (IDs 83GA, 84GA, and 85GA).
- 04/08/11 502(b)10 to remove Insignificant Activity IDs 253P, 256P, 258P, 249P, 254P, 252P, 260P, 262P, 264P, and 266P - <1.5 MMBTU/hr Evaporators #1-#10.
- 04/21/11 502(b)10 to add two portable 20 kW diesels to the insignificant activities (IDs 86GA, and 87GA)
- 05/02/11 502(b)10 to add one M-Area Microblower (ID 618M), one 20,000 gallon diesel in C-Area (ID 254C), the evaporation of disassembly basin water (ID 243C) and ten (10) <1.5 MMBTU/hr evaporators in C-Area (IDs 244C, 245C, 246C, 247C, 248C, 249C, 250C, 251C, 252C, and 253C) . This 502(b)10 also removes two 20,000 fuel tanks in P-Area (IDs 247P and 267P).
- 05/17/11 Request to change a Responsible Official from Anthony Umek to Alice Doswell.
- 06/13/11 Issued exemption for a small column ion exchange (SCIX) in tank 41H (Equipment ID 354H). Request received 05/25/11.
- 06/22/11 502(b)10 to add a Dry Frit Pneumatic System (ID 508S) and one 10,000 gallon Sodium Hydroxide (50wt%) Chemical Addition tank (ID 54GH) to the insignificant activities.
- 07/26/11 502(b)10 to include Equipment ID 254T (906-T Air Stripper) to the insignificant activities list and to remove Equipment ID 332G (683-2G CMP Baroballs) for the Insignificant activities list.
- 10/12/11 502(b)10 to add a pilot scale training program to the G-Area Insignificant activities list (Equipment ID 345 G).
- 10/13/11 502(b)10 to add one 175 kW emergency diesel generator (ID 97JF) and one 3500 gallon fuel oil tank (ID 98JF) to the insignificant activities list in F-Area.
- 10/21/11 502(b)10 to add the Ordinance/Weapons training activity performed by Wackenhut to the insignificant activities list in G-Area (ID 346G).
- 10/21/11 5002(b)10 to add 346G to the Insignificant Activities (IA) list.
- 11/02/11 Minor Modification to add eight mobile diesel generators (14EN, 15EN, 16EN, 17EN, 18EN, 19EN, 20EN, 21EN) to the mobile diesel equipment pool (Emission Unit ID N-031).
- 11/18/11 502(b)10 to add one 20 kW emergency diesel generator (ID 145B) to the insignificant activities list in B-Area.
- 03/13/12 502(b)10 to addition of two (2) Honda 2 kW (2.68 hp) engines to the Insignificant Activities List.
- 03/13/12 502(b)10 to add two (2) Putzmeister 72 kW (96 hp) engines to the Insignificant Activities List.
- 03/14/12 502(b)10 to add D-Area coal storage pile (034D) and the 488-4D Ash Basin (203D) to the insignificant activities list.
- 03/14/12 Administrative Amendment to change the environmental contact.
- 03/22/12 Request to change the contact information for RO Kevin Kostelnik.
- 03/28/12 502(b)10 to add Equipment 313G, 347G, 31DN, 492H, 12AH, 33GH, 35GH, 36GH, 37GH, 39GH, 40GH, 41GH, 43GH, 49GH, 311S, 312S, 313S, 413S to the Insignificant Activities List.



STATEMENT OF BASIS
Page 15 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 04/25/12 Request to change Responsible Official (RO) from Jeannette Hyatt to Mary Flora.
- 05/01/12 502(b)10 to addition control equipment to Z-Area.
- 05/04/12 502(b)10 to remove 032N the drum crusher, located at building 645-2N from the insignificant activities list.
- 07/02/12 502(b)10 to remove of 104G (30KW Emergency Diesel Generator located at 701-8G; add 349G (Phytoremediation system) located at Mixed Waste Management Facility (MWMF) to the Insignificant Activities List.
- 07/23/12 502(b)10 to replace Building 620-G with 714-G-IDS165G, 187G, 188G, AND 191G.
- 08/29/12 502(b)10 to remove ten (10) C-Area evaporators and two (2) 20,000 gallon diesel fuels tanks. Equipment IDs:244C, 245C, 246C, 247C, 248C, 249C,250C, 251C, 252C, 253C, 241C, and 254C from the Insignificant Activities List.
- 10/31/12 Issued exemption for military training exercises. Request received 07/30/12.
- 11/08/12 502(b)10 to remove two (2) Soil Vapor Extraction Units 311G and 611M from source M-007 Western Sector DUS Extraction System.
- 11/15/12 502(b)10 to remove two units, 101F(241-F Waste Tank 18 Purge) and 106F (241-F Waste Tank 19 Purge) from F-area Tank Farm. Removes a K-Area fuel unloading station 237K and two K-Area fuel tanks 238K and 239K from the insignificant activities list.
- 01/22/13 502(b)10 to remove two units - 243C (Disassembly Water Evaporation) and 141E (664-E LL WS Shredder) from the Insignificant Activities List.
- 01/22/13 502(b)10 to change two (2) production diesel engines H-019 and H-020 (92EH and 93EH) rated at 800kW each, to emergency equipment. H-019 and H-020 will change from major sources to insignificant activities in Attachment B. The diesel engines will remain at building 254-19H.
- 02/11/13 502(b)10 to remove equipment ID 543H (222-H Mercury Bulk Storage) since the containers stored are closed with no vents. Additionally, the following fugitive fueling sources were removed from the IA List: 714A, 546A, 82GA, 021G, 344G, 188G, 187G, 138G, 128K, 138L, 082N, 096N and 024B.
- 03/01/13 Issued exemption to add a well ASH-06 to 322G which changes the nature of VOC emissions from source G-004. Request received 02/14/13.
- 03/04/13 502(b)10 to remove Equipment IDs 093K (183-3K Emergency Diesel Generator 365 kW) and 103Z (Saltstone Disposal Area) from Insignificant Activity list.
- 03/06/13 502(b)10 to remove major source N-031 from the operating permit.
- 03/29/13 502(b)10 to remove Units - Equipment IDs 414H, 491H, 492H, 33GH, 35GH, 36GH, 39GH, 40GH, 41GH, 43GH, 49GH, 12AH, 311S, 312S, 313S and 413S from the Insignificant Activities List. Equipment IDs 417H, 415H, 418H and 103S all will have name changes to correctly describe the source.
- 03/29/13 502(b)10 to reclassify major sources M-005, M-006 and M-007.
- 04/05/13 502(b)10 to Add 619M to the Insignificant Activity list.
- 05/15/13 502(b)10 to remove Mobile Plutonium Facility (MPF) Equipment from the Insignificant Activity List.
- 05/17/13 502(b)10 to remove unit 54GH (H Tank Farm Chemical Addition Tank, NaOH, 50wt% 10,000 Gal) from the Insignificant Activity List.
- 06/06/13 502(b)10 to remove 62DN from and add 76DN, 411N and 61DN as emergency air compressors in H Canyon to the Insignificant Activities List.
- 06/07/13 502(b)10 to remove five diesel generators (169G, 099G, 478H, 513H, 83DN) from the Insignificant Activity List.
- 07/08/13 502(b)10 to change the basis for SCDHEC ID 291K on insignificant activities list.



STATEMENT OF BASIS
Page 16 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 08/14/13 502(b)10 to remove several RICE units from Insignificant Activities (IA) List
- 11/21/13 502(b)10 to remove equipment listed on insignificant activities list (064A, 793A, 540A, 531A and 213H).
- 11/21/13 502(b)10 to add to insignificant activities list (602H & 613H) and remove from of 06DH from Unit H001.
- 12/16/13 502(b)10 to revise Form F for the site's Title V permit renewal application identified (3) three new aggregate handling and storage sources to be incorporated (22EN, 23EN, 24EN), (5) five inactive material handling sources (393N, 460N, 31DN, 64DN, 70DN) to be deleted and (3) three sources (313G, 394N, 398N) requiring unit description revisions.
- 12/16/13 502(b)10 to remove the D Area coal storage pile (ID 034D) and 488-4D Ash Basin (ID 203D) from the Appendix B, Insignificant Activities list.
- 12/16/13 502(b)10 to remove 064A, 793A, 540A, 531A, and 213H from the Insignificant Activities List.
- 12/16/13 502(b)10 to remove 602H, 613H and 06DH for the Insignificant Activities List.
- 12/20/13 502(b)10 to remove numerous sources from the Insignificant Activities List.
- 01/06/14 502(b)10 to remove the 906-T Air Stripper (254T).
- 01/13/14 502(b)10 to remove TRU Drum venting (152F) from Insignificant Activities list.
- 01/24/14 502(b)10 to add nineteen (19) stationary RICE applicable Units to the Insignificant Activities List. Equipment IDs are 159E, 160E, 161E, 162E, 163E, 164E, 165E, 166E, 167E, 168E, 169E, 173E, 174E, 175E, 176E, 177E, 178E, 179E, & 181E.
- 02/07/14 502(b)10 to add two (2) Salt Waste Processing Facility sources to the Insignificant Activities List.
- 02/24/14 502(b)10 to add abrasive media storage silo to insignificant activity list.
- 02/24/14 502(b)10 to add 4 Internal Combustion Engines (09FA, 10FA, 18EN, and 78DN) to and remove 1 Internal Combustion Engine (411N) from the Insignificant Activities (IA) List.
- 02/26/14 502(b)10 to remove TRU Drum venting (152E) from the Insignificant Activities List.
- 03/05/14 502(b)10 to add 725-1N Recycle Facility Aerosol Can Crushing System to the Insignificant Activities List.
- 03/10/14 502(b)10 to remove Control Device N002 (294-H Sand Filter).
- 04/28/14 502(b)10 to add discharging of Expired Fire Extinguishers (27EN/N QJ0001) to insignificant Activity List
- 05/28/14 Administrative Amendment to revise sections g6.B.2, m6.B.2 & m6.B5 (Method 18 revision).
- 06/11/14 502(b)10 to notify the Department that Equipment ID 324G of unit G-004 will be installed in June 2014.
- 07/03/14 502(b)10 to addition Internal Combustion Engine (ICE) ID 18EN to the Insignificant Activities (IA) List.
- 07/25/14 502(b)10 to add 6 units (04KF, 58GH, 59GH, 60GH, 61GH and 182E) to the Insignificant Activities (IA) list.
- 08/11/14 502(b)10 to add one Emergency Diesel Internal Combustion Engine (ID 003J) to Insignificant Activity List.
- 08/21/14 502(b)10 to add an above ground tank used to store Ultra Low Sulfur Diesel (ULSD) fuel (004J) to the Insignificant Activities List.
- 09/12/14 502(b)10 to add Emergency Diesel Internal Combustion Engine (SCDHEC ID 352G) to the Insignificant Activity List.
- 10/01/14 502(b)10 to add Emergency Diesel Internal Combustion Engine (SCDHEC ID003J) to the Insignificant Activity List.
- 10/01/14 502(b)10 to add Ultra Low Sulfur Diesel (ULSD) protected above ground storage tank with a maximum usable capacity of 9,500 gallons (SCDHEC ID 004J) to the Insignificant Activity List.
- 10/10/14 502(b)10 to add of D Area Remediation Phase 1 (DEJ3) emissions point to the Insignificant Activities List.



STATEMENT OF BASIS
Page 17 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 10/20/14 502(b)10 to remove 159E from the Insignificant Activities List and reclassify 181E as an emergency engine under 40 CFR 63, Subpart ZZZZ.
- 11/12/14 502(b)10 to remove 159E from the Insignificant Activities List, Attachment B, and reclassify 181E as an emergency engine under 40 CFR 63, Subpart ZZZZ.
- 11/12/14 502(b)10 to change abrasives utilized at N-Area Blast Yard, Unit N-001, SCDHEC ID 370N.
- 11/24/14 502(b)10 to remove Insignificant Activity SCDHEC ID 25EN, abrasive storage silo located in N-Area.
- 01/28/15 502(b)10 to add one Emergency Diesel Generator (64GH). 64GH replaces Emergency Diesel Generator 562H and to remove 562H from the operating permit.
- 01/28/15 Request to update Responsible Officials.
- 02/05/15 502(b)10 to add insignificant activity (IA) 353G
- 02/05/15 502(b)10 to reduce sampling frequency of Emission Unit M-006 ID 271G, A-2 Air Stripper.
- 03/05/15 502(b)10 to add Insignificant Activity (IA) 05KF.
- 04/16/15 502(b)10 to add Unit 259C to and remove Unit 463N from the Insignificant Activities List.
- 04/20/15 502(b)10 to add Unit 620M to Insignificant Activities List.
- 05/06/15 502(b)10 to add Unit 02HA to Insignificant Activities (IA) List.
- 06/17/15 502(b)10 to add Unit 509S to the Insignificant Activities (IA) List.
- 06/22/15 502(b)10 to add Units 355G and 158B to the Insignificant Activities (IA) List.
- 07/22/15 502(b)10 to add Units 06KF and 07KF to Insignificant Activities (IA) List.
- 10/12/15 502(b)10 to add 3 units (65GH, 66GH and 67GH) to the IA list.
- 10/26/15 502(b)10 to add 008A to Insignificant Activities (IA) List.
- 11/02/15 Administrative Amendment to Incorporate Method TO-15 as an approved method for VOCs.
- 11/09/15 502(b)10 to add 28EN to Insignificant Activities (IA) List.
- 11/12/15 502(b)10 to add one unit (205D) to the Insignificant Activities (IA) List.
- 01/27/16 502(b)10 to remove Unit 205D from and add Unit 206D to Insignificant Activities List.
- 02/11/16 502(b)10 to add one unit (68GH) to the Insignificant Activities (IA) List.
- 02/16/16 Request to add and remove Responsible Officials.
- 02/24/16 502(b)10 to remove the Chemicals, Metals, and Pesticides (CMP) air stripper, SCDHEC Equipment ID 333G from Emission Unit G-004, Emission Point GEP32.
- 03/21/16 502(b)10 to add Equipment ID 69GH, HTP25 S23, Lathe to the insignificant activities list.
- 03/21/16 502(b)10 to add Equipment ID 356G, liquid waste operations (LWO) fire extinguisher training and remove Unit 68GH to the Insignificant Activities List.
- 03/21/16 502(b)10 to move units H02, S002, and S003 to Insignificant Activities List.
- 04/01/16 502(b)10 to remove one unit (542N) from the Insignificant Activities (IA) List.
- 05/04/16 502(b)10 to add Units 70GH and 71GH. These units are exempt from construction permitting.
- 05/11/16 502(b)10 to add Unit 08KF to Insignificant Activities List.
- 05/25/16 502(b)10 to add one unit (207D) to the Insignificant Activities (IA) List.
- 06/06/16 502(b)10 to add Equipment ID 30EN - Pressure Washer/Steam Cleaner. This unit is exempt from construction permitting.
- 07/11/16 502(b)10 to downgrade 291-F Canyon Stack (F-002). It will no longer operate as a PIC2 source for radiological air emissions. See rescission on 4/24/17.
- 07/20/16 502(b)10 to add two (2) units (126X and 127Z) to the Insignificant Activities (IA) list.
- 09/01/16 502(b)10 to add two units (11KF and 12KF) to the Insignificant Activities (IA) List.
- 09/15/16 502(b)10 to add three (3) units (970H, 971H, and 972H) to the Insignificant Activities (IA) List.



STATEMENT OF BASIS
Page 18 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 09/26/16 502(b)10 to add two units (09KF and 1 OKF) to the Insignificant Activities (IA) List.
- 10/11/16 502(b)10 to add one unit (208D) to the Insignificant Activities (IA) List.
- 12/19/16 Request to add and remove Responsible Officials.
- 01/09/17 502(b)10 to add two units (03HA and 357G) to and removal one unit (204D) from the Insignificant Activities (IA) List
- 01/13/17 502(b)10 to add three units (128Z, 14KF, and 72GH) to and remove two units (70GH and 71GH) from the Insignificant Activities (IA) List.
- 01/19/17 502(b)10 to replace 111B (B002) with 159B (B004) - Like for Like Replacement.
- 04/24/17 502(b)10 to withdraw request for reclassification of major source F-002, F Canyon.
- 05/30/17 502(b)10 to add four (4) units (73GH, 74GH, 75GH and 76GH) to the Insignificant Activities (IA) List.
- 06/01/17 502(b)10 to add one unit (005J) to the Insignificant Activities (IA) list.
- 06/30/17 502(b)10 to add the 235-F non radiological particulate matter source 15KF to the insignificant activities list.
- 07/12/17 Administrative Amendment to update the physical address of the plant.
- 07/14/17 502(b)10 to add two units (510S and 511S) to the Insignificant Activities (IA) List.
- 07/28/17 502(b)10 to add one unit (78GH) to the Insignificant Activities (IA) List.
- 09/05/17 502(b)10 to withdraw the portion of the 502(b)(10) package request filed under SRNS-J2000-2013-00097 on 3/20/2013 that reclassified emission unit M-005 to an Insignificant Activity due to emission levels.
- 09/28/17 502(b)10 to add four generators (79GH, 80GH, 81GH, and 82GH) to the Insignificant Activities List.
- 09/29/17 502(b)10 to remove Unit 117B from and add to Unit 160B the Insignificant Activities (IA) List.
- 10/23/17 502(b)10 to replace 110B (Boiler #1 at 3.897MMBtu/hr at BQH1) with 161B (3.129MMBtu/hr at BQH1). Like for Like replacement.
- 10/27/17 Issued construction permit 0080-0041-C1 for the 235-F deactivation activities.
- 11/13/17 502(b)10 to add one unit (83GH) to Insignificant Activities List.
- 01/29/18 502(b)10 to remove three (3) units (08KF, 158B, and 355G) from the insignificant Activities List.
- 01/29/18 502(b)10 to add three (3) units (84GH, 85GH, and 512S) to and remove one (1) unit (510S) from, the Insignificant Activities (IA) List.
- 03/05/18 502(b)10 to add one unit (513S) to and remove one unit (84GH) from the Insignificant Activities (IA) List.
- 03/09/18 502(b)10 to revise the description of 02HA on the Insignificant Activities List.
- 04/12/18 502(b)10 to add ID 358G - Dry oxidant in support of In Situ Chemical Oxidation at Western Sector.
- 05/04/18 502(b)10 to remove several units from G-004 (224C, 288G, 289G, 321G, and 333G) from the Insignificant Activities (IA) List.
- 07/13/18 502(b)10 to add one unit (86GH) to the Insignificant Activities (IA) List.
- 07/17/18 502(b)10 to add 279P to the Insignificant Activities (IA) List.
- 08/01/18 502(b)10 to add two units (87GH and 17KF) to the Insignificant Activities (IA) List.
- 08/20/18 502(b)10 to install a HEPA filter as a voluntary control device on emission unit A-005 (Emission Point AGP007).
- 08/30/18 502(b)10 to add two units (88GH and 89GH) to the Insignificant Activities (IA) List.
- 09/07/18 502(b)10 to add one unit (187E) to the Insignificant Activities (IA) List.
- 09/27/18 502(b)10 to add three units (90GH, 17KF, and 91GH) to the Insignificant Activities (IA) List.
- 10/04/18 502(b)10 to add Units 90GH, 18KF, and 91GH REV 1



STATEMENT OF BASIS
Page 19 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

- 10/09/18 502(b)10 to add three units (009J, 010J, 011J and 012J) to the Insignificant Activities (IA) List.
- 11/26/18 502(b)10 to remove three units (206D, 207D, 208D) from the Insignificant Activities (IA) List.
- 12/06/18 502(b)10 to add one unit (92GH) to the Insignificant Activities (IA) List.
- 02/04/19 502(b)10 to add one unit (93GH) to the Insignificant Activities (IA) List.
- 02/04/19 Minor Modification to add one well (RWM-19) to Emission Unit M-005, Emission Point M-EP2303, M1 Air Stripper.
- 03/08/19 502(b)10 to remove two units (85IF and 86IF) from the Insignificant Activities (IA) List.
- 03/22/19 502(b)10 to add three units (94GH, 129Z and 514S) to the Insignificant Activities (IA) List.
- 04/19/19 502(b)10 to remove units 292G, 293G, 294G, 295G, 296G, 297G, 298G, 299G, 300G, 301G, 302G, 269G, 270G, 275G, 276G, 277G, 278G, 279G, 282G, 283G, and 274G from the Insignificant Activities (IA) List.
- 05/02/19 502(b)10 to remove unit 322G from Unit ID G-004.
- 05/15/19 502(b)10 to remove five units (461H, 439H, 177E, 511S and 74GH) from the Insignificant Activities (IA) List.
- 06/13/19 502(b)10 to remove unit 612M from and add unit 622M to the Insignificant Activities (IA) List.
- 06/17/19 502(b)10 to add units 621M and 623M to the Insignificant Activities (IA) List.
- 08/08/19 Issued construction permit 0080-0041-C2 for a lead melter.
- 08/14/19 502(b)10 to add four units (95GH, 96GH, 97GH, and 19KF) to the Insignificant Activities (IA) List.
- 08/21/19 502(b)10 to add two Baroballs at the M-Area Abandoned Process Sewer Line (621M) to the Insignificant Activities (IA) List.
- 10/02/19 502(b)10 to add one unit (06HA) to the Insignificant Activities (IA) List.
- 10/08/19 Submittal of a revised CAM plan for Z-Area.
- 10/10/19 502(b)10 to remove 165E from the Insignificant Activities (IA) List.
- 10/17/19 502(b)10 to perform a like for like replacement on Equipment ID 112B (B003) with 162B (B006).
- 11/15/19 502(b)10 to add one air compressor (99GH) to the Insignificant Activities (IA) List.
- 12/02/19 502(b)10 to add one unit (20KF) to the Insignificant Activities (IA) List.
- 12/19/19 Construction start notice of 0080-0041-C3.
- 12/19/19 502(b)10 to reclassify G-004 as an insignificant activity.
- 12/23/19 502(b)10 to add emission point H-SL0001 to IA unit 285-11H.
- 01/06/20 502(b)10 to remove one unit (05KF) from the Insignificant Activities (IA) list.
- 01/15/20 502(b)10 to add the fugitive fueling sources from the 02/11/13 request to the Insignificant Activities (IA) List.
- 03/10/20 502(b)10 to remove two units (280G and 281G) from the Insignificant Activities (IA) list.
- 03/13/20 502(b)10 to remove four units (009J, 010J, 011J and 012J) from the Insignificant (IA) Activities List.
- 03/23/20 502(b)10 to add two units (02HH and 03HH) to the Insignificant Activities (IA) List.
- 03/23/20 Minor modification request to incorporate 0080-0041-C3 into the Title V permit.
- 06/09/20 502(b)10 to add on stationary generator to the Insignificant Activities (IA) List.

SOURCE TEST REQUIREMENTS

A-Area

| ID | Pollutant | Frequency | Standard |
|------|-----------|--------------------------|-----------------------|
| 66GA | Opacity | Initial and As Requested | 40 CFR 60, Subpart Dc |



STATEMENT OF BASIS
Page 20 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatima Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| ID | Pollutant | Frequency | Standard |
|------|---------------------|--|--------------------------------|
| 66GA | PM/PM ₁₀ | Initial and per 40 CFR 63, Subpart DDDDD | SC Regulation 61-62.5, Std 1 |
| 66GA | PM/PM ₁₀ | Initial and As Requested | 40 CFR 60, Subpart Dc |
| 66GA | SO ₂ | Initial and Biennial | SC Regulation 61-62.5, Std 1 |
| 66GA | NOx | Initial, Every 24 months | SC Regulation 61-62.5, Std 5.2 |

F-Area

| ID | Pollutant | Frequency | Standard |
|------|---------------------------------------|------------|----------------------|
| 77CF | Radionuclides via Gas Volumetric Flow | Semiannual | 40 CFR 61, Subpart H |

H-Area

| ID | Pollutant | Frequency | Standard |
|--|---------------------------------------|------------|----------------------|
| 99CH 01DH 02DH 03DH 05DH 07DH 08DH 09DH 10DH 12DH 13DH 20DH 24DH | Radionuclides via Gas Volumetric Flow | Semiannual | 40 CFR 61, Subpart H |

M-Area

| ID | Pollutant | Frequency | Standard |
|------|-----------|-----------------|-------------------------------------|
| 529M | VOC | Monthly, Annual | SC Regulation 61-62.1, Section II.H |

SPECIAL CONDITIONS, MONITORING, LIMITS

Facility Wide

Some installation dates may have changed from previous submittals. Included in the renewal application was a complete scrub of all equipment installation dates. Several emission sources have been removed or reclassified as insignificant activities since the previous Title V. Additionally, several pieces of equipment were added to S-Area (Unit



STATEMENT OF BASIS
Page 21 of 28
BAQ Air Permitting Division

| | |
|--|---|
| Company Name: USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: TV-0080-0041 | Date: January 19, 2021 |

16) as they have been interpreted to be part of the process and should be included as permitted equipment. Included in this renewal was a complete scrub of all of the permitted equipment. This revision allocates an emission unit for each area in the event additional permitted sources are identified in the future.

All fuel burning emissions using No. 2 fuel oil have been calculated using a sulfur content limitation of 0.0015wt% sulfur. This is the sulfur content all sources emitting SO₂ were modeled and shall become the limit.

A-Area

The facility previously chose to operate the bead blaster (794A) for no more than 6 hours per week (and for no more than 5,300 hours per consecutive 12-month period). It is unclear why this limitation was requested as the unit was grandfathered into the Title V, yet the emissions calculations were based on this limitation. The facility has revised the emission calculations with this revision crediting the building for PM control and clarifying that the collection/recycle system is an inherent, integral part of the operation rather than a control device. The control device is considered inherent for the following reasons:

1. Is the primary purpose of the equipment to control air pollution?
No, The abrasive media (glass beads) are collected in the bag so they can be reused as abrasive media in the bead blaster.
2. Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?
The bag is not recovering product, it is recovering abrasive media (glass beads) to be reused in the bead blaster.
3. Would the equipment be installed if no air quality regulations are in place?
Yes, it is more efficient and cost effective to reuse the abrasive media (glass beads).

For the 784-7A Steam Facility Biomass Boiler (66GA,) previously the owner or operator was required to demonstrate compliance with sulfur dioxide emissions from the Biomass Boiler by fuel analysis. SC Regulation 61-62.5, Standard No. 1, Section VI does not specify the frequency of demonstrating compliance with the SO₂ emissions limit of 2.3 lb SO₂/million BTU input (S.C. Regulation 61-62.5, Standard No. 1 Section III). The past three fuel analyses (performed over the past 5 years) indicate the clean wood (SC Regulation 61-62.1 Section 1) burned at the 784-7A biomass boiler is 0.05%, 0.01%, and 0.01% sulfur.

Example Calculation: $(0.05 \text{ lb S}/100 \text{ lb wood})(1 \text{ lb wood}/5200 \text{ BTU})(1000 \text{ Btu}/1\text{MBTU}) = 9.61\text{E-}05 \text{ lb S}/\text{MBTU}$
 $(9.61\text{E-}05 \text{ lb S}/\text{MBTU})[(64 \text{ lbSO}_2/\text{lb mole SO}_2)/(32 \text{ lbS}/\text{lb mole S})](1 \text{ mole SO}_2/1 \text{ mole S}) = 1.92\text{E-}04 \text{ lb SO}_2/\text{MBTU}$

The above calculation conservatively uses the heating value from Appendix A from AP42 for wood at 40% moisture - 5200 BTU/lb.

The clean wood burned at 66GA doesn't contain enough sulfur for the SO₂ emissions to approach the limit of 2.3 lb SO₂/MBTU. The requirement to perform fuel analysis for sulfur is no longer required.

F-Area



STATEMENT OF BASIS
Page 22 of 28
BAQ Air Permitting Division

| | |
|--|---|
| Company Name: USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: TV-0080-0041 | Date: January 19, 2021 |

For the F-Canyon Cell Exhaust (77CF) that emits radionuclides as its only form of particulate matter, SC Regulation 61-62.5, Standard 4, opacity and PM limits are applicable for such sources. However, because the nature of this particulate matter such that it is subject to 40 CFR 61 Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities, the methods described in this NESHAP will be sufficient to ensure continued compliance with Standard 4.

H-Area

For the H-Canyon sources (99CH, 01DH, 02DH, 03DH, 05DH, 07DH, 08DH, 09DH, 10DH, 12DH, 13DH, 20DH, and 24DH) that emit radionuclides as its only form of particulate matter, SC Regulation 61-62.5, Standard 4, opacity and PM limits are applicable for such sources. However, because the nature of this particulate matter such that it is subject to 40 CFR 61 Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities, the methods described in this NESHAP will be sufficient to ensure continued compliance with Standard 4.

M-Area

For the 323-M, M-1 Groundwater Air Stripper (529M) - Air emissions assume that 100% of the contaminants are stripped from the inlet groundwater. Water sampling will be performed by a certified laboratory utilizing Method 8260B – Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry. Water sampling frequencies shall be completed once per month. If the facility desires to change the technique or the frequency of the technique used to calculate the relevant emission factor, it will be necessary to revise the permit through the permit modification procedures found at SC Regulation 61-62.70.7.

For source 529M - this emission unit was granted a synthetic minor construction permit with project wide VOC limits as well as individual VOC limits. See 0080-0041-M-CK for details. There was a discrepancy between the permit limit and the actual limit that was clarified in a revision to page 3 of the construction permit dated 03/23/99. The correct value was 8.05 TPY.

A minor modification was received for 529M in February 2019. This modification increased the emission rate of Trichloroethylene (TCE) and VOCs to 12.9 TPY. This modification did not result in the M1 air stripper exceeding the 10.2 lb/hr and 44.69 TPY VOC limits contained in the previous Title V permit under condition m6.B.1.”

N-Area

The facility has chosen to operate the abrasive blaster (Equipment ID 370N) for no more than to 1,040 hours per year. In addition, total abrasive usage through the abrasive blast cleaner shall be limited to 192,000 pounds per year. It is unclear why this limitation was requested, yet will remain since the emissions are based on this limitation.

S-Area

In order to demonstrate compliance with SC Regulation 61-62.5, Standard 4, SRS shall monitor process system parameters and leak detection systems as required by facility operating and emergency procedures to detect leaks from the condenser and take actions as necessary to isolate and correct the leak as specified in WSRC Letter ESH-ECS-2002-00284. Quarterly reports of incidences identified in WSRC Letter ESH-ECS-2002-00284 shall be submitted. If no incidences occurred during the reporting period, the report shall state so.



STATEMENT OF BASIS
Page 23 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatima Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

Z-Area

The process weight range for this saltstone is 35-40 tons per year. The construction and operating permits are conservatively calculated on the low end of this range, 35 tons per hour. The modeled emission rates are conservatively calculated based on the upper end of the range, 40 tons per hour.

| FACILITY WIDE EMISSIONS | | | |
|-------------------------------------|---------------------|-------------------|------------|
| Pollutant | Uncontrolled | Controlled | PTE |
| | TPY | TPY | TPY |
| PM | 2.73E+03 | 2.75E+02 | 2.75E+02 |
| PM ₁₀ | 2.04E+03 | 2.68E+02 | 2.68E+02 |
| PM _{2.5} | 2.01E+03 | 2.46E+02 | 2.46E+02 |
| NO _x | 9.72E+02 | 8.05E+02 | 8.05E+02 |
| SO ₂ | 2.80E+03 | 5.61E+02 | 5.61E+02 |
| CO | 6.59E+02 | 6.59E+02 | 6.59E+02 |
| VOCs | 1.98E+02 | 1.98E+02 | 1.98E+02 |
| Pb | 3.57E-01 | 2.39E-01 | 2.39E-01 |
| HF | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| HAP – Single Greatest – Nitric Acid | 1.67E+02 | 1.67E+02 | 1.67E+02 |
| Total HAPs | 2.95E+02 | 2.80E+02 | 2.80E+02 |
| CO _{2e} | 5.87E+05 | 5.87E+05 | 5.87E+05 |

OPERATING PERMIT STATUS

This facility operates under Title V Operating Permit; issued on 02/19/03; effective on 04/01/2003; expired on 03/31/2008. A timely application for renewal was received on 09/18/2007.

| REGULATORY APPLICABILITY REVIEW | |
|--|---|
| Regulations | Comments/Periodic Monitoring Requirements |
| Section II.E – Synthetic Minor | The facility has synthetic minor limits for PM, PM ₁₀ , NO _x , SO ₂ and CO on the A-Area Boilers (66GA, 67GA). The facility also has a synthetic minor limit for VOCs on the M-1 Air Stripper (529-M). Please see table below for further information. |
| Standard No. 1 | <p><u>A-Area</u> Equipment IDs 66GA and 67GA are subject to the 20% opacity, 0.6 lb/million BTU PM and 2.3 lb/million BTU SO₂ limits as required by this standard. Opacity compliance is determined by a COMs for 66GA and weekly visual inspections for 67GA. PM compliance is determined by source testing for 66GA and daily fuel records for 67GA. SO₂ compliance is determined by source testing for 66GA and fuel supplier certifications for 67GA.</p> <p><u>B-Area</u> Equipment IDs 162B, 159B and 161B are subject to the 20% opacity, 0.6 lb/million BTU NO_x and 2.3 lb/million BTU SO₂ limits as required by this standard. Opacity</p> |



STATEMENT OF BASIS
Page 24 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

REGULATORY APPLICABILITY REVIEW

| Regulations | Comments/Periodic Monitoring Requirements |
|-----------------------------|--|
| | <p>compliance is determined by semiannual visual inspections while source is in operation. PM compliance is determined by emission calculations. SO₂ compliance is determined by fuel supplier certifications.</p> <p>Please see table below for further information.</p> |
| Standard No. 3 (state only) | The facility does not have any waste combustion sources. |
| Standard No. 4 | <p><u>A-Area</u> Equipment ID 794A is subject to the 20% opacity standard and a PM limit of 0.789 lb/hr which corresponds to a process weight rate of 0.0855 tons per hr.</p> <p><u>F-Area</u> Equipment ID 77CF is subject to the 40% opacity standard. PM limits are applicable, however, because the nature of this particulate matter such that it is subject to 40 CFR 61 Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities, the methods described in this NESHAP will be sufficient to ensure continued compliance with Standard 4.</p> <p><u>H-Area</u> Equipment IDs 99CH, 01DH, 02DH, 03DH, 05DH, 07DH, 08DH, 09DH, 10DH, 12DH, 13DH, 20DH, and 24DH are subject to the 40% opacity standard. PM limits are applicable, however, because the nature of this particulate matter such that it is subject to 40 CFR 61 Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities, the methods described in this NESHAP will be sufficient to ensure continued compliance with Standard 4.</p> <p>Equipment IDs 770H, 772H, 773H, and 774H are subject to the 40% opacity standard. No PM limits are applicable since there are no process PM emissions.</p> <p><u>M-Area</u> Equipment ID 529M is subject to the 40% opacity standard. No PM limits are applicable since there are no process PM emissions.</p> <p><u>N-Area</u> Equipment ID 370N is subject to the 40% opacity standard and a PM limit of 5.73 lb/hr which corresponds to a process weight rate of 1.649 tons per hr.</p> <p><u>S-Area</u> Equipment IDs 266S, 267S, 270S, 275S, 264S, 256S, 278S, 488S, 388S, 176S, 177S, 178S, 121S, 111S, 109S, 108S, 107S, 106S, 105S, 103S, 102S, 101S, 100S, 098S,</p> |



STATEMENT OF BASIS
Page 25 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

REGULATORY APPLICABILITY REVIEW

| Regulations | Comments/Periodic Monitoring Requirements |
|------------------------|---|
| | <p>132S, 131S, 129S, and 128S are subject to the 20% opacity standard and a PM limit of 1.6 lb/hr which corresponds to a process weight rate of 0.24 tons per hr.</p> <p><u>Z-Area</u> Equipment IDs 052Z, 069Z, 071Z, 072Z, 073Z, 074Z, 075Z, 076Z, and 091Z are subject to the 20% opacity standard and a PM limit of 41.3 lb/hr which corresponds to a process weight rate of 35 tons per hr.</p> <p>Please see table below for further information.</p> |
| Standard No. 5 | None of the processes, which are regulated by the regulation, apply. |
| Standard No. 5.2 | <p><u>A-Area</u> In accordance with SC Regulation 61-62.5, Standard No. 5.2 – Control of Oxides of Nitrogen, Section III (b), the allowable discharge of NO_x resulting from the Biomass Boiler (Equipment ID 66GA) is 0.33 lb/MMBtu. This limit is a case by case NO_x determination submitted as part of the construction permit 0080-0041-A-CG.</p> <p>In accordance with SC Regulation 61-62.5, Standard No. 5.2 – Control of Oxides of Nitrogen, Section III, the allowable discharge of NO_x resulting from the Fuel Oil Boiler (Equipment ID 67GA) is 0.15 lb/MMBtu.</p> <p>Monthly fuel records are required for this standard based on regulatory revisions. This requirement has been added to the operating permit.</p> <p><u>B-Area</u> Equipment IDs 162B, 159B and 161B are exempt from this regulation since they are sources less than 10 million BTU/hr.</p> |
| Standard No. 7 | The facility is a major source for PSD for PM, PM ₁₀ , PM _{2.5} , SO ₂ , NO _x , CO, and VOCs, however this TV permit renewal is not significant. |
| 61-62.6 | The fugitive PM (Dust) emissions are controlled in a manner that should not produce undesirable levels of PM (Dust) emissions. |
| 40 CFR 60 and 61-62.60 | <p><u>Facility Wide</u> Any new emergency engines will be subject to the provisions of 61-62.60, New Source Performance Standards (NSPS), Subparts A (General Provisions) and IIII (Stationary Compression Ignition Internal Combustion Engines) or JJJJ (Stationary Spark Ignition Internal Combustion Engines). The owner/operator shall comply with all applicable parts of Subparts A and IIII or JJJJ.</p> <p><u>A-Area</u> The boilers (Equipment IDs 66GA and 67GA) are subject to the provisions of 40 CFR 60 and 61-62.60, New Source Performance Standards (NSPS), Subparts A (General Provisions) and Dc (Small Industrial-Commercial-Institutional Steam</p> |



STATEMENT OF BASIS
Page 26 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatima Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| REGULATORY APPLICABILITY REVIEW | |
|--|---|
| Regulations | Comments/Periodic Monitoring Requirements |
| | <p>Generating Units). The owner/operator shall comply with all applicable parts of Subparts A and Dc.</p> <p><u>B-Area</u> These units are not subject to Subparts A and Dc as they are less than 10 million BTU/hr.</p> |
| 40 CFR 61 and 61-62.61 | <p><u>F-Area</u> F-Canyon (Equipment ID 77CF) is subject to National Emission Standards For Hazardous Air Pollutants (NESHAP), 40 CFR 61 Subpart A (General Provisions) and Subpart H (Emissions Of Radionuclides Other Than Radon From Department Of Energy Facilities).</p> <p><u>H-Area</u> H-Canyon (Equipment IDs , 99CH, 01DH, 02DH, 03DH, 05DH, 07DH, 08DH, 09DH, 10DH, 12DH, 13DH, 20DH, 21DH, 22DH, 23DH, and 24DH) are subject to National Emission Standards For Hazardous Air Pollutants (NESHAP), 40 CFR 61 Subpart A (General Provisions) and Subpart H (Emissions Of Radionuclides Other Than Radon From Department Of Energy Facilities).</p> |
| 40 CFR 63 and 61-62.63 | <p><u>Facility Wide</u> Stationary Reciprocating Internal Combustion Engines listed in the Insignificant Activities list (Form F) may be subject to National Emission Standards For Hazardous Air Pollutants (NESHAP), 40 CFR 63 Subpart A (General Provisions) and Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines). The owner/operator shall comply with all applicable parts of Subparts A and ZZZZ.</p> <p><u>A-Area</u> Equipment IDs 66GA and 67GA are subject to the provisions of 40 CFR 63 and 61-62.63, National Emission Standards For Hazardous Air Pollutants (NESHAP), Subparts A (General Provisions)and DDDDD (Industrial, Commercial, And Institutional Boilers And Process Heaters.) The owner/operator shall comply with all applicable parts of Subparts A and DDDDD.</p> <p><u>B-Area</u> Equipment IDs 162B, 159B and 161B are subject to the provisions of 40 CFR 63 and 61-62.63, National Emission Standards For Hazardous Air Pollutants (NESHAP), Subparts A (General Provisions)and DDDDD (Industrial, Commercial, And Institutional Boilers And Process Heaters.) The owner/operator shall comply with all applicable parts of Subparts A and DDDDD.</p> |
| 61-62.68 | The facility does not have any of the regulated pollutants above the threshold quantities. |



STATEMENT OF BASIS
Page 27 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatima Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| REGULATORY APPLICABILITY REVIEW | |
|---------------------------------|---|
| Regulations | Comments/Periodic Monitoring Requirements |
| 40 CFR 64 (CAM) | <u>Z-Area</u> This process is not subject to CAM. While the process is above 100 TPY, has a limit and has a control device, PM is not considered a criteria pollutant with respect to 40 CFR 70. |

| Explanation of Synthetic Minor Limits | | | | | |
|---------------------------------------|--------------|-------------------|------------------|----------------------|--|
| Permit ID | Equipment ID | Permit Issue Date | Pollutant | Emission Limit (TPY) | Explanation |
| a-CF a-CG | 66GA 67GA | 04/27/07 | PM | 25.0 | COMS for ESP monitoring on 66GA Weekly Fuel Records |
| a-CF a-CG | 66GA 67GA | 04/27/07 | PM ₁₀ | 15.0 | COMS for ESP monitoring on 66GA Weekly Fuel Records |
| a-CF a-CG | 66GA 67GA | 04/27/07 | SO ₂ | 40.0 | Weekly Fuel Records |
| a-CF a-CG | 66GA 67GA | 04/27/07 | NO _x | 40.0 | Weekly Fuel Records |
| a-CF a-CG | 66GA 67GA | 04/27/07 | CO | 100.0 | Weekly Fuel Records |
| m-CK-R1 | 529M | 03/09/99 | VOC | 8.05 | Monthly Samples |

| Standard No. 1 Allowable | | | | | | |
|--------------------------|----------------------|-----------------------------------|------------------------|-------------------------|----------------------|-------------------------|
| ID | PM Allowable (lb/hr) | SO ₂ Allowable (lb/hr) | Uncontrolled Emissions | | Controlled Emissions | |
| | | | PM (lb/hr) | SO ₂ (lb/hr) | PM (lb/hr) | SO ₂ (lb/hr) |
| 66GA | 2.40E+01 | 9.2E+01 | 1.39E+01 | 1.00E+00 | 1.48E+00 | 1.00E+00 |
| 67GA | 2.40E+01 | 9.2E+01 | 3.16E-01 | 6.09E-02 | 3.16E-01 | 6.09E-02 |
| 162B | 1.88E+00 | 7.20E+00 | 7.20E-02 | 4.76E-03 | 7.20E-02 | 4.76E-03 |
| 159B | 1.88E+00 | 7.20E+00 | 7.20E-02 | 4.76E-03 | 7.20E-02 | 4.76E-03 |
| 161B | 1.88E+00 | 7.20E+00 | 7.20E-02 | 4.76E-03 | 7.20E-02 | 4.76E-03 |

| Standard No. 4 Allowable | | | | | |
|--------------------------|-------------------------------|----------------------|-----------------------------------|---------------------------------|---|
| Process | Process Weight Rate (tons/hr) | PM Allowable (lb/hr) | Uncontrolled Emissions PM (lb/hr) | Controlled Emissions PM (lb/hr) | Monitoring |
| 794A | 0.0855 | 0.789 | 1.73 | 0.451 | Visuals at the beginning of operation Window and door inspection at the beginning of operation |
| 370N | 1.649 | 5.73 | 5.00 | 5.00 | Daily visuals while in operation Operating hours and material usage restrictions. |



STATEMENT OF BASIS
Page 28 of 28
 BAQ Air Permitting Division

| | | | |
|-----------------------|---|-----------------------|---|
| Company Name: | USDOE – Savannah River Nuclear Solutions, LLC | Permit Writer: | Fatina Ann Washburn Clark Robert Mahoney |
| Permit Number: | TV-0080-0041 | Date: | January 19, 2021 |

| Standard No. 4 Allowable | | | | | |
|--|-------------------------------|----------------------|-----------------------------------|---------------------------------|--|
| Process | Process Weight Rate (tons/hr) | PM Allowable (lb/hr) | Uncontrolled Emissions PM (lb/hr) | Controlled Emissions PM (lb/hr) | Monitoring |
| 266S, 267S, 270S, 275S, 264S, 256S, 278S, 488S, 388S, 176S, 177S, 178S, 121S, 111S, 109S, 108S, 107S, 106S, 105S, 103S, 102S, 101S, 100S, 098S, 132S, 131S, 129S, 128S | 0.24 | 1.6 | 0.12 | 0.12 | Leak detection system monitoring |
| 052Z, 069Z, 071Z, 072Z, 073Z, 074Z, 075Z, 076Z, 091Z | 35.0 | 41.3 | 236 | 1.65 | Daily Visuals Baghouse Monitoring and Inspections |

| AMBIENT AIR STANDARDS REVIEW | |
|------------------------------|---|
| Regulations | Comments/Periodic Monitoring Requirements |
| Standard No. 2 | The facility has demonstrated compliance with requirements of this standard. See modeling summary dated 10/05/2020. |
| Standard No. 7.c | The facility has demonstrated compliance with requirements of this standard. See modeling summary dated 10/05/2020. |
| Standard No. 8 (state only) | The facility has demonstrated compliance with requirements of this standard. See modeling summary dated 10/05/2020. |

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II.N and SC Regulation 61-62.70.7(h). The comment period was open from November 30, 2020 to December 29, 2020 and was placed on the BAQ website during that time period. No comments were received during the comment period.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.