Company Name:	Westinghouse Electric Company LLC	**Permit Writer:**	Austin Goode
Permit Number:	SOP-1900-0050	**Date:**	**DRAFT**

DATE APPLICATION RECEIVED: December 4, 2017; Updated May 30, 2019
DATE OF LAST INSPECTION: August 29, 2017 – No violations of permit conditions or applicable regulations were observed during the inspection.

FACILITY DESCRIPTION
Westinghouse Electric Company LLC fabricates nuclear fuel assemblies containing low-enriched (<5% U-235) uranium oxide fuel for use in commercial light-water nuclear powered reactors.

PROJECT DESCRIPTION
The facility requested the renewal of their state operating permit. Additionally, c/p-CD is being incorporated. Construction Permit CD was for the replacement of the scrubber 1030 shell.

A temporary Boiler was installed at the facility on February 2nd, 2018 and was planned to be on site until new permanent Boilers were installed. Temporary Boilers are exempt from permitting as long as the equipment is on site for less than 1 calendar year. The temporary Boiler exceeded this 1-year limit for exemption from permitting and has been introduced to the permit as part of this project.

The scrubbers have historically been considered inherent to the process and listed as pieces of equipment. Westinghouse submitted a justification for the inherency of the scrubbers, with the exception of plating room scrubber S-4025, which was determined to not be inherent, based on EPA's most recent guidance (Merit Energy Letter). The Department has reviewed the justification and concurs with the conclusion.

As part of this renewal, the Emission Unit and Equipment IDs have been changed and organized to better reflect operations at the facility. All of the equipment in the previous permit was listed with its own Emission Unit ID. As part of this renewal, operations at the facility have been grouped into six separate Emission Unit IDs (EU 01 and EU-22-26) to more clearly illustrate closely related equipment. The previous Emission Unit IDs 02-21 have been marked VOID. This is not due to the equipment being removed from the facility but is a result of the reorganization of existing equipment; with the exception of the emergency generators (Emission Unit IDs 05-08) which were previously removed from the permit due to them being considered exempt equipment.

The following table maps the previous Emission Unit IDs, emission unit description, and the new Emission Unit ID.

Previous Emission Unit ID	Previous Emission Unit Description	New Emission Unit Description	New Emission Unit ID
01	2.51 million Btu/hr natural gas fired Industrial Incinerator	Incinerator	01
04	8.3 million Btu/hr natural gas/No. 2 fuel oil fired Boiler	Boilers	22
09	Calciner #1: A 0.57 million Btu/hr natural gas fired North American Model NA-4424-0	Conversion	24
10	Calciner #2: A 0.57 million Btu/hr natural gas fired North American Model NA-4424-0		

Previous Emission Unit ID	Previous Emission Unit Description	New Emission Unit Description	New Emission Unit ID
11	Calciner #3: A 0.57 million Btu/hr natural gas fired North American Model NA-4424-0		
12	Calciner #4: A 0.57 million Btu/hr natural gas fired North American Model NA-4424-0		
13	Calciner #5: A 0.57 million Btu/hr natural gas fired North American Model NA-4424-0		
14	Conversion System #1. Includes a ammonium diuranate high energy venture cyclone (Heil 724) and HEPA filters		
15,16	ADU Scrap Recovery & ADU On-Line Scrubber S-1030 System (A & B). Includes KCH-Hedron V packed tower scrubber and HEPA filter		
17	Ammonia Fume Scrubber. Includes KCH-Phaser IV packed tower scrubber with HEPA filters		
18	ADU/Waste Recovery Waterglass Scrubber Exhaust. Includes KCH Hedron- packed tower scrubber	Waterglass	25
19	Plating Room Scrubber Exhaust. Includes Heil 760 packed horizontal baffle scrubber	Plating	23
20	Uranium Recovery/Solvent Extraction. Includes Harrington horizontal packed baffle venture scrubber with cyclone scrubber and HEPA filters	Solvent Extraction	26

In the previous permit, there was no difference between the Emission Unit IDs and the Equipment IDs of sources at the facility. As part of this permit, each of these sources has been assigned a new Equipment ID as part of the reorganization of the permit. In the previous permit, for some processes, only the final equipment (i.e., exhausts to the atmosphere) was listed, instead of the whole process. Because all equipment is listed on this renewal, there are some sources which did not appear on previous permits; although, no new sources have been added.

Previous Equipment ID	Equipment Description	New Equipment ID
Emission Unit ID 21 - Incinerator		
01	2.51 Million BTU/hr natural gas fired Incinerator	01-1
Emission Unit 22 – Boilers		
04	8.3 Million BTU/hr natural gas / No. 2 fuel oil fired Boiler	22-1
Emission Unit 23 – Plating		
--	Plating Tanks	23-1
Emission Unit 24 – Conversion		

Previous Equipment ID	Equipment Description	New Equipment ID
09	0.57 Million BTU/hr Natural gas fired Calciner #1	24-1
10	0.57 Million BTU/hr Natural gas fired Calciner #2	24-2
11	0.57 Million BTU/hr Natural gas fired Calciner #3	24-3
12	0.57 Million BTU/hr Natural gas fired Calciner #4	24-4
13	0.57 Million BTU/hr Natural gas fired Calciner #5	24-5
--	Conversion Area	24-6
15,16	ADU Scrap Recovery & ADU On-Line Scrubber System. Includes KCH-Hedron V packed tower scrubber and divergent HEPA filter houses	S-1030
--	Non-ammonia service vessels, URRS, and Solvent Extraction (SOLX)	24-7
14	Conversion system that includes two ammonium diuranate high energy venture cyclones (Heil 724) operating in parallel and divergent HEPA filter houses	S-2A, S-2B
--	Ammonia Fume Ventilation System	24-8
17	Ammonia Fume Scrubber	S-1008
Emission Unit 25 - Waterglass		
--	Ammonium Hydroxide Storage Tanks	25-1
--	(2) Ammonia Stills	25-1
--	Waterglass Process	25-1
18	Waterglass (ADU Waste Recovery) Scrubber Exhaust. Includes KCH-Hedron packed tower scrubber	S-1190
Emission Unit 26 – Solvent Extraction		
--	Safe Geometry Dissolver Process	26-1
20	Solvent Extraction Scrubber	S-958

This operating permit renewal also includes the rollover of construction permit 1900-0050-CD. This construction permit involved the modification of scrubber S-1030. The scrubber body was replaced as the current body was reaching the end of its operational life. Changes made to the body of the scrubber are not expected to impact emissions estimates from the source.

CHANGES SINCE LAST OP ISSUANCE

A construction permit (c/p-CC) has been issued to replace the three existing boilers (Previous Equipment IDs 02, 03, and 04) with two new 24.5 MMBTU/hr Boilers. This construction permit has not yet been rolled in. Once the new Boilers are in place and operational, the facility should submit an application to modify their operating permit.

Equipment IDs 02 and 03 (Boilers #1 and #2) have been removed from the facility and will not be included in the renewed permit.

Since 2007, there have been several minor modifications to sources listed in this permit and exempt sources at the facility. The following table details these changes.

Date of Change	Equipment / Control Device ID	Description
2007	S-1008	• Replacement of existing S-1008 system with a new KCH 4300 ft^3/min system; • Removal of old heater and replacement with in-line heater • Replacement of 14" ductwork with 18" ductwork on discharge side of scrubber
2008	S-1008	• Installation of a vacuum break for each Q-tank to prevent back flow into the scrubber
2008	S-1190	• Refurbishment of existing scrubber • Installation of more efficient spray nozzles • Installation of an access door for packing • Addition of an extra Mist Eliminator
2008	S-1030	• Relocation of scrap cage filter press from roof filter system 7A to S-1030
2008	S-1030	• Installation of Double Demister
2009	S-1030	• Removal of a manual block valve and automatic control valve for addition of ammonia for pH adjustment
2009	S-2A/S-2B	• Replacement of filters houses 1A and 1B with new filter houses consisting of pre-filters, intermediate filters, and HEPA filters with the same efficiency of filters being replaced.
2012	S-4025	• Installation of a new hood over plating room hot rinse tank which ties into scrubber S-4025
2013	S-2A/S-2B	• Replacement of 3 banks of cartridge filter housings with 3 banks of bag filter housings
2013	S-1190	• Mechanical replacement of scrubber with similar unit.
2014	S-1190	• Decrease of fan rotational speed to operate in a more stable area of equipment performance curve. Adjustment will have no effect on flow rate or scrubber ventilation performance.
2/11/2016	S-4025	• "Like for Like" replacement of the Plating Room Scrubber
9/7/2016	S-1030	• Continuous bleed off • Transition of spray nozzles to inlet • Continuous pH monitoring & future control capability • Installation of internal packing baskets
11/30/2016	S-1030	• Redirection of ventilation ducts on the sifters from S-2010 to FL-150 Torit
11/15/2016	S-958	• Air gap added to process water supply for S-958
1/9/2017	S-1030	• Changed impeller on pump 1030A and 1030B from 11.625" to 13"

SOURCE TEST/EMISSION STUDIES REQUIREMENTS
The facility will conduct the following source tests for compliance.

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SOURCE TESTS			
Source	**Pollutant**	**Frequency**	**Regulation**
Incinerator (01)	PM	Initial: 180 days; Every 2 years thereafter, unless an alternative method is approved	Std. 3, Section VIII
Incinerator (01)	SO_2, NO_x, CO, VOCs	Initial: 180 days; subsequent periodic testing may be required	62.1, Section II.J.2 (Demonstrate actual emissions are below estimates)
S-4025	HF, HNO_3, HCl, H_2SO_4, Nickel, Cadmium, Phosphorus	Initial: 180 days; subsequent periodic testing may be required	62.1, Section II.J.2 (Demonstrate actual emissions are below estimates)
S-1030[1], S-2A/S-2B, S-1008, S-1190, S-958	HF, NO_X, HNO_3	Initial: 180 days; subsequent periodic testing may be required	62.1, Section II.J.2 (Demonstrate actual emissions are below estimates)

[1]Scrubber S-1030 had initial testing required in c/p-CD. Will not have to repeat for OP renewal if already conducted.

SPECIAL CONDITIONS

In previous operating permits, the facility was not required to monitor operational parameters. Parametric monitoring is being established with this permit.

EMISSIONS

As part of this renewal, an engineering study was performed on the scrubbers to help in the estimation of emission rates. To account for natural variance in emissions, safety factors were used when determining potential emissions. With the issuance of this permit, the facility will be required to conduct source testing to verify actual emission rates are below the potential emission rates. Below is a table of sources and pollutants whose emissions were subject to a safety factor.

Source	**Pollutant**	**Safety Factor (Emissions Test Result Multiplied by X)**
S-4025 Scrubber	Antimony	5
	Arsenic	
	Beryllium	
	Cadmium	
	Chromium	
	Cobalt	
	Manganese	
	Nickel	
	Phosphorus	
	Selenium	

Source	Pollutant	Safety Factor (Emissions Test Result Multiplied by X)
	Hydrogen Flouride	
	Nitric Acid	
	Hydrochloric Acid	
	Sulfuric Acid	
	Lead	
S-1030 Scrubber	Hydrogen Flouride	5
	Nitric Acid	5
	NO_X	3
S-958 Scrubber	Hydrogen Flouride	5
	Nitric Acid	
	NO_X	2
S-1190 Scrubber	Hydrogen Flouride	5
	Nitric Acid	
S-2A/2B Scrubber	Hydrogen Flouride	5
	Nitric Acid	
S-1008 Scrubber	Hydrogen Flouride	5
	Nitric Acid	

The incinerators at nuclear facilities such as Westinghouse are unique designs. Emissions were estimated using AP-42 emission factors from Chapter 2.1 - Refuse Combustion, Table 2.1-12, Uncontrolled Emission Factors for Refuse Combustors, Industrial/Commercial Multiple Chamber Combustors.

FACILITY WIDE EMISSIONS			
Pollutant	**Uncontrolled**	**Controlled**	**PTE**
	TPY	**TPY**	**TPY**
PM	9.627	--	9.627
PM_{10}	9.627	--	9.627
$PM_{2.5}$	9.216	--	9.216
SO_2	3.106	--	3.106
NO_X	50.475	--	50.475
CO	25.233	--	25.233
VOC	4.268	--	4.268
Pb	4.4E-04	--	4.4E-04
HNO_3 (T) (CAS #: 7697-37-2)	2.57	--	2.57
HF (H) (CAS #: 7664-39-3)	0.304	--	0.304
HCl (H)(T) (CAS #: 7647-01-0)	0.395	--	0.395
H_2SO_4 (T) (CAS #: 7664-93-9)	0.624	--	0.624
Highest Single HAP Perchloroethylene (H)(T) (CAS #: 127-18-4)	3.72	--	3.72

FACILITY WIDE EMISSIONS			
Pollutant	**Uncontrolled**	**Controlled**	**PTE**
	TPY	**TPY**	**TPY**
Hexane (H)(T)(V)(CAS #110-54-3)	0.38	--	0.38
Arsenic (T) (CAS #: 7440-38-2)	4.63E-03	--	4.63E-03
Cadmium (T) (CAS #: 7440-43-9)	2.97E-05	--	2.97E-05
Chromium (T) (CAS #: 7440-47-3)	3.29E-05	--	3.29E-05
Mercury (T) (CAS #: 7439-97-6)	2.41E-03	--	2.41E-03
Nickel (T) (CAS #: 7440-02-0)	5.65E-05	--	5.65E-05
Lead (CAS # 7439-92-1)	2.86E-04	--	2.86E-04
Tetrachlorinated dibenzo-p-dioxin (H)(T)(V) (CAS # 1746-01-6)	6.82E-08	--	6.82E-08
Total HAP Emissions	4.18	--	4.18

[1]Ammonia is neither a Hazardous Air Pollutant under federal regulations, nor a Toxic Air Pollutant under state regulations. It is listed here for information purposes only.

OPERATING PERMIT STATUS

This facility operates under State Minor Source Operating Permit 1900-0050; issued on March 5, 2008; effective on March 5, 2008; expired on February 28, 2018. The renewal request was received December 4, 2017. Westinghouse may continue operation, under the terms and conditions of the expired permit, until such time as the renewal request is acted upon.

RADIONUCLIDES

Some of the scrubbers have HEPA filters on their exhaust. These are present for control of radionuclides and not particulate matter. Non-radionuclide PM is not expected from the scrubber exhaust.

EPA does not currently have any, Clean Air Act, regulations on the release of radionuclides to the ambient air from facilities licensed by the Nuclear Regulatory Commission; although radionuclides are listed as a Hazardous Air Pollutant under Section 112 of the Clean Air Act.

NESHAPS (Part 61): The 1990 amendments allowed EPA to eliminate "regulatory duplication" with the NRC where the EPA "can determine that the NRC program provides protection of the public health equivalent to that required by the CAA." Regarding this type of facility, "other than commercial nuclear reactors," EPA rescinded the Part 61 NESHAP requirements for radionuclides in a final rule published in the 12/30/96 Federal Register. For a full explanation and history, see 61 FR 68972.

Title V: Radionuclides are excluded from the 10/25 TPY definition of major source under Title V (SC Regulation 61-62.70.1(r); equiv. 40 CFR 70.2). Instead, the regulation states that "for radionuclides, 'major source' shall have the meaning specified by the Administrator by rule." As verified with EPA's regional permitting contact, to date, EPA has not promulgated a major source definition for radionuclides.

NESHAPS (Part 63): The definition of major source in Part 63 has an exclusion from 10/25 for radionuclides, similar to Title V. See §63.2.

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REGULATORY APPLICABILITY REVIEW	
Regulations	**Comments/Periodic Monitoring Requirements**
Section II.E – Synthetic Minor	**Not applicable.** The facility does not have any synthetic minor limits and has not requested any limits as part of this renewal.
Standard No. 1	**Applicable.** The Boiler at this facility (Equipment ID 04) and the five Calciners (Equipment ID 24-1 through 24-5; combustion exhaust) are fuel burning sources subject to this standard. This standard will apply opacity, PM, and SO_2 emission limitations. There will be a 20% limit to opacity from these sources at all times except for periods of sootblowing. During periods of sootblowing, the 20% limit can be exceeded, but for no more than 6 minutes in a one hour period or 24 minutes in a 24 hour period. During these periods, the opacity limitation will be 60%. Please see the Standard No. 1 Allowable table below. No monitoring is necessary.
Standard No. 3 (state only)	**Applicable.** Although used for material recovery, the incinerator is not considered a furnace as the material that it is recovering does not undergoing any type of reaction; unlike the other named furnace sources (cement kilns, lime kilns, etc.). The material is recovered by the reduction and destruction of the other, combustible material. The on-site Incinerator (EQP 01) will burn combustible materials from other processes and will be subject to this standard. This source will be subject to a 20% opacity limitation, as well as a 0.5 lb / Million BTU limit on PM emissions. In accordance with Standard No. 3, Section VIII, periodic tests will be required to be performed on the industrial incinerator. These tests will be scheduled every two years. This regulation also requires training for all Incinerator Operators as outlined in Section IX.C of this standard. Previously, the facility was required to maintain the content of the training program and a list of trained personnel on site and made available upon request. This information will be required to be submitted to the Department within 30 days of the issuance of the permit. A condition was added to the permit specifying the type of materials that may be combusted, and explicitly excluding waste classified as hazardous.
Standard No. 4	**Applicable.** Emission Units 23-26 are subject to a 20% Opacity limitation because the equipment or associated control devices have been modified or replaced since December 31, 1985.

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REGULATORY APPLICABILITY REVIEW	
Regulations	**Comments/Periodic Monitoring Requirements**
	For Emission Unit 24, only the process emissions portion is submit to this standard. Emission Units 23, 24, 25, and 26 do not produce PM emissions. As such, there will be no associated PM emission limit for these sources. In the previous permit, the opacity limits stemming from Standard 4 regulation varied between pieces of equipment. However, as all of the equipment exhausts through a scrubber system and all of the scrubber systems have been modified since 1985, all equipment is now subject to the 20% opacity limit.
Standard No. 5	**Not applicable.** This facility has VOC emissions, but the facility is not one of the listed subject source categories.
Standard No. 5.2	**Not applicable.** The combustion sources at this facility were constructed prior to the effective date of this regulation and none of those sources have been re-located or had their burner assemblies replaced since the effective date of this Standard.
Standard No. 7	**Not applicable.** This facility does not meet the definition of a major source.
61-62.6	**Not applicable.** Facility does not produce fugitive dust emissions.
40 CFR 60 and 61-62.60	**Applicable.** **Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: Not applicable.** This standard applies to steam generating units for which construction, modification, or reconstruction was commenced after June 9, 1989. The Boiler #3 (Equip ID 22-1) was constructed in 1975 and has not been modified after the effective date of this regulation. **Subpart E – Standards of Performance for Incinerators: Not applicable**. The loading rate for this incinerator is below the 50 tons/day applicability threshold. **Subpart G – Standards of Performance for Nitric Acid Plants: Not applicable.** This standard applies to facilities which contain a nitric acid production unit. A nitric acid production unit is defined as any facility producing weak nitric acid. This facility uses and emits nitric acid as part of their process but does not produce the nitric acid being emitted. **Subpart Ga – Standards of performance for Nitric Acid Plants for which Construction, Reconstruction, or Modification commenced after October 14, 2011: Not applicable.** This standard applies to facilities which contain a nitric acid production unit. A nitric acid production unit is defined as any facility producing weak nitric acid. This facility uses and emits nitric acid as part of their process but does not produce the nitric acid being emitted. **Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries: Not applicable.** This standard applies to calciners and dryers at a

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REGULATORY APPLICABILITY REVIEW	
Regulations	**Comments/Periodic Monitoring Requirements**
	Mineral Processing Plant. This facility does not meet the definition of a Mineral Processing Plant because it does not process or produce any of the listed materials in the definition for such a plant. **Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units: Not applicable.** The Incinerator at this facility was constructed in 1973 and was last modified in 2018. However, the incinerator combusts waste for the primary purpose of recovering metals (Uranium). Because of this, it meets the definition of a "materials recovery unit" and is exempt from the requirements of this subpart. **Subpart DDDD – Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units: Not applicable.** This facility does not meet the definition of a solid waste incineration unit. The on-site incinerator (Equipment ID 01) combusts waste for the primary purpose of recovering metals (Uranium). This means the unit is considered a "materials recovery unit" and is not included in the definition of "Solid Waste Incineration Unit". **Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: Applicable.** This standard applies to facilities which operate stationary compression ignition internal combustion engines. The facility operates eight (8) Emergency Generators on site. Seven of these generators were installed prior to June 12, 2006, and are not subject to this standard. One (1) 50 kW Emergency Generator was installed in 2011 and will be subject to the requirements of this standard.
40 CFR 61 and 61-62.61	**Not applicable.** The facility is not one of the listed subject source categories. **Subpart I – National Emission Standards for Radionuclide Emissions from Federal Facilities other than Nuclear Regulatory Commission Licensees and not covered by Subpart H: Not applicable.** This subpart applies to facilities owned or operated by any Federal agency other than the Department of Energy and not licensed by the Nuclear Regulatory commission. This facility is not owned or operated by a Federal Agency.

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REGULATORY APPLICABILITY REVIEW	
Regulations	**Comments/Periodic Monitoring Requirements**
40 CFR 63 and 61-62.63	**Applicable.** **Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: Applicable.** This standard applies to facilities which operate a stationary reciprocating internal combustion engine. The facility operates eight (8) Emergency Generators on site. **Subpart JJJJJJ - National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, and Institutional Boilers Area Sources: Not applicable.** Boilers at this facility are not subject to this subpart because they meet the definition of a gas fired boiler, as defined in this subpart, as they only burn No. 2 fuel oil during periods of natural gas curtailment. A condition addressing potential applicability should operations at the facility exceed the established No. 2 Fuel Oil testing allowances is included in the permit.
61-62.68	**Applicable**. This facility stores subject chemicals (aqueous ammonia above 20% conc.) above the threshold quantities. A Risk Management Plan was submitted to the US EPA on June 18, 1999 and was approved on July 2nd, 1999.
40 CFR 64 (CAM)	**Not applicable**. The facility does not meet the definition of a major source.

Standard No. 1 Allowable						
Equipment 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)**
Emission Unit ID 22 - Boilers						
22-1	4.98	19.09	0.3441	7.41	--	--
22-2	8.718	33.419	0.191	0.015	--	--
Emission Unit ID 24 - Conversion						
24-1	0.342	1.311	4.2E-03	3.0E-04	--	--
24-2	0.342	1.311	4.2E-03	3.0E-04	--	--
24-3	0.342	1.311	4.2E-03	3.0E-04	--	--
24-4	0.342	1.311	4.2E-03	3.0E-04	--	--
24-5	0.342	1.311	4.2E-03	3.0E-04	--	--

AMBIENT AIR STANDARDS REVIEW	
Regulations	**Comments/Periodic Monitoring Requirements**
Standard No. 2	**Applicable.** Facility has demonstrated compliance through modeling. See modeling summary dated July 11, 2019.
Standard No. 7.c	**Not applicable.** Not applicable. Facility does not meet the definition of a major source.
Standard No. 8 (state only)	**Applicable.** Facility has demonstrated compliance through modeling. See modeling summary dated July 11, 2019.

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PUBLIC NOTICE

This State Operating Permit will undergo a 30-day public notice period in accordance with SC Regulation 61-62.1, Section II.N. This permit was placed in *The State* on September 12, 2019. The comment period was open from September 12, 2019 to October 11, 2019 and was placed on the BAQ website during that time 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.