



STATEMENT OF BASIS
Page 1 of 12
BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

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 (SIC CODE: 2819 / NAICS CODE: 325998)
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.

PREVIOUS INCINERATION OF TETRACHLOROETHYLENE (aka Perchloroethylene aka PERC)
Westinghouse Electric Company LLC and the Environmental Protection Agency settled allegations of incinerating tetrachloroethylene (aka perchloroethylene) containing hazardous waste with a Consent Agreement and Final Order (Docket No. RCRA-04-2022-2103(b)).

PROJECT DESCRIPTION
The facility requested the renewal of their State Operating Permit. Additionally, c/p-CD and c/p-CC are being incorporated. Construction Permit CD was for the replacement of the scrubber 1030 shell. Construction Permit CC was for two new Cleaver Brooks boilers that replaced boilers that have been voided on the renewed permit.

Condition C.8 of c/p-CD is not being carried over from the construction permit. C.8 required semi-annual reports of S-1030 monitoring, excursions, and maintenance information. Given the lack of issues identified since the facility reporting began under c/p-CD, this State Operating Permit will use the standard requirement of maintaining the records on site. With the incorporation of c/p-CD, after issuance of the State Operating Permit, the facility will no longer be required to submit reports per C.8 of c/p-CD.

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. 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 five separate Emission Unit IDs (EU 01 and EU-22, 24-26) to illustrate closely related equipment more clearly. 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.

During review of this permit, the facility ceased plating operations (Emission Unit ID: 23). Production ceased on February 10, 2020, and all hazardous materials and chemicals associated with the source was removed from the facility on March 16, 2020.

Additional Changes from 2019 Draft

1. During review of updated drafts, the facility identified existing equipment in the Conversion Area (ID 24-6; exhausts to scrubber S-1030); Non-ammonia service vessels, URRS, and Solvent Extraction area (ID 24-7;



STATEMENT OF BASIS
Page 2 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

exhausts to scrubber S-2A/2B); and the Ammonia Fume Ventilation System (ID 24-8; exhausts to scrubber S-1008), that it had unintentionally omitted. The identification of this equipment does not represent any additional emissions or emissions points. The emissions from these areas were calculated using scrubber exhaust testing with safety factors. The identified equipment existed at the time of the scrubber exhaust testing.

2. Oil was added to the list of incidental contaminants present on rags and mop heads incinerated. This was not a change in operation; it was an update to the materials list. The presence of small quantities of oil will not change the emissions, which are conservatively estimated based on combusting municipal solid waste.
3. Added 2018 Incinerator Safety Upgrade Project to list of changes since the last State Operating Permit was issued. No changes to emissions occurred, as such the change is not noted in the incinerator modification dates in the State Operating Permit. See Westinghouse Letter LTR-RAC-18-24 for full details.
4. Added explanation for not carrying over condition C.8 from c/p-CD.

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
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		
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	S-2A/2B, Conversion System #1. Includes an 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	S-1008, Ammonia Fume Scrubber. Includes KCH-Phaser IV packed tower scrubber with HEPA filters		



STATEMENT OF BASIS
Page 3 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

Previous Emission Unit ID	Previous Emission Unit Description	New Emission Unit Description	New Emission Unit ID
18	S-1190, ADU/Waste Recovery Waterglass Scrubber Exhaust. Includes KCH Hedron-packed tower scrubber	Waterglass	25
20	S-958, 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 24 - Conversion		
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/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



STATEMENT OF BASIS
Page 4 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

Previous Equipment ID	Equipment Description	New Equipment ID
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

CHANGES SINCE LAST OP ISSUANCE

Equipment IDs 02, 03, and 04 (Boilers #1 #2, #3) have been removed from the facility and will not be included in the renewed permit. New Cleaver Brooks Boilers #1 and #2 are 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	<ul style="list-style-type: none"> Replacement of existing S-1008 system with a new KCH 4300 ft³/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	<ul style="list-style-type: none"> Installation of a vacuum break for each Q-tank to prevent back flow into the scrubber
2008	S-1190	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Relocation of scrap cage filter press from roof filter system 7A to S-1030
2008	S-1030	<ul style="list-style-type: none"> Installation of Double Demister
2009	S-1030	<ul style="list-style-type: none"> Removal of a manual block valve and automatic control valve for addition of ammonia for pH adjustment
2009	S-2A/2B	<ul style="list-style-type: none"> 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.
2013	S-2A/S-2B	<ul style="list-style-type: none"> Replacement of 3 banks of cartridge filter housings with 3 banks of bag filter housings
2013	S-1190	<ul style="list-style-type: none"> Mechanical replacement of scrubber with similar unit.
2014	S-1190	<ul style="list-style-type: none"> 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.



STATEMENT OF BASIS
Page 5 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

Date of Change	Equipment / Control Device ID	Description
9/7/2016	S-1030	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Redirection of ventilation ducts on the sifters from S-1030 to FL-150 Torit
11/15/2016	S-958	<ul style="list-style-type: none"> Air gap added to process water supply for S-958
1/9/2017	S-1030	<ul style="list-style-type: none"> Changed impeller on pump 1030A and 1030B from 11.625" to 13"
2018	01	<ul style="list-style-type: none"> Replaced off-gas duct, added a fourth demister, added a second duct heater, re-oriented the filter houses, and refurbished exhaust fans

In addition, the facility was issued an exemption for activities pertaining to the processing of up to 522 drums of wet combustible material (WCM) containing tetrachloroethylene (aka perchloroethylene). Proposed emissions from this project were below the exemption criteria for both air construction permitting and modeling. For more information, please see Statement of Basis 1900-0050-09X issued on September 15, 2022.

SOURCE TEST REQUIREMENTS

The facility will conduct the following source tests for compliance.

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-2A/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)
S-1030	In the previously noticed draft, S-1030 required an initial test, and potentially subsequent testing. Under the requirements in c/p-CD, S-1030 was tested on September 11, 2019, and will not have to repeat testing.		

SPECIAL CONDITIONS, MONITORING, LIMITS

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.



STATEMENT OF BASIS
Page 6 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

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-1030 Scrubber	Hydrogen Fluoride	5
	Nitric Acid	5
	NO _x	3
S-958 Scrubber	Hydrogen Fluoride	5
	Nitric Acid	2
	NO _x	2
S-1190 Scrubber	Hydrogen Fluoride	5
	Nitric Acid	5
S-2A/2B Scrubber	Hydrogen Fluoride	5
	Nitric Acid	5
S-1008 Scrubber	Hydrogen Fluoride	5
	Nitric Acid	5

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
VOC	4.268	--	4.268
Lead (CAS # 7439-92-1)	0.39E-04	--	0.39E-04
HNO ₃ (T) (CAS #: 7697-37-2)	1.14	--	1.14
HF (H) (CAS #: 7664-39-3)	0.103	--	0.103
Perchloroethylene ¹ (H)(T) (CAS #: 127-18-4)	0.03 ¹	--	0.03 ¹



STATEMENT OF BASIS
Page 7 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

FACILITY WIDE EMISSIONS			
Pollutant	Uncontrolled	Controlled	PTE
	TPY	TPY	TPY
Highest Single HAP Hexane(H)(T)(V) (CAS #110-54-3)	0.38	--	0.38
Mercury (T) (CAS #: 7439-97-6)	2.41E-03	--	2.41E-03
Tetra chlorinated dibenzo-p-dioxin (H)(T)(V) (CAS # 1746-01-6)	6.82E-08	--	6.82E-08
Total HAP Emissions	4.18	--	4.18

¹Dodecane replaced perchloroethylene (aka tetrachloroethylene) in the solvent extraction process. The emission rates shown for perchloroethylene is the potential emissions from processing up to 522 drums of wet combustible material (WCM) containing tetrachloroethylene; see exemption 09x. Dodecane is neither a HAP or TAP.

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.



STATEMENT OF BASIS
Page 8 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

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. 7	Not Applicable. This facility does not meet the definition of a major source.																																																																										
Standard No. 1	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">ID</th> <th rowspan="2">PM Allowable (lb/hr)</th> <th rowspan="2">SO₂ Allowable (lb/hr)</th> <th colspan="2">Uncontrolled Emissions</th> <th colspan="2">Controlled Emissions</th> </tr> <tr> <th>PM (lb/hr)</th> <th>SO₂ (lb/hr)</th> <th>PM (lb/hr)</th> <th>SO₂ (lb/hr)</th> </tr> </thead> <tbody> <tr> <td colspan="7" style="text-align: center;">Emission Unit ID 22 - Boilers</td> </tr> <tr> <td>22-CB-1</td> <td>14.1</td> <td>54.1</td> <td>0.55</td> <td>0.034</td> <td>--</td> <td>--</td> </tr> <tr> <td>22-CB-2</td> <td>14.1</td> <td>54.1</td> <td>0.55</td> <td>0.034</td> <td>--</td> <td>--</td> </tr> <tr> <td colspan="7" style="text-align: center;">Emission Unit ID 24 - Conversion</td> </tr> <tr> <td>24-1</td> <td>0.342</td> <td>1.311</td> <td>4.25E-03</td> <td>3.35E-04</td> <td>--</td> <td>--</td> </tr> <tr> <td>24-2</td> <td>0.342</td> <td>1.311</td> <td>4.25E-03</td> <td>3.35E-04</td> <td>--</td> <td>--</td> </tr> <tr> <td>24-3</td> <td>0.342</td> <td>1.311</td> <td>4.25E-03</td> <td>3.35E-04</td> <td>--</td> <td>--</td> </tr> <tr> <td>24-4</td> <td>0.342</td> <td>1.311</td> <td>4.25E-03</td> <td>3.35E-04</td> <td>--</td> <td>--</td> </tr> <tr> <td>24-5</td> <td>0.342</td> <td>1.311</td> <td>4.25E-03</td> <td>3.35E-04</td> <td>--</td> <td>--</td> </tr> </tbody> </table>	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-CB-1	14.1	54.1	0.55	0.034	--	--	22-CB-2	14.1	54.1	0.55	0.034	--	--	Emission Unit ID 24 - Conversion							24-1	0.342	1.311	4.25E-03	3.35E-04	--	--	24-2	0.342	1.311	4.25E-03	3.35E-04	--	--	24-3	0.342	1.311	4.25E-03	3.35E-04	--	--	24-4	0.342	1.311	4.25E-03	3.35E-04	--	--	24-5	0.342	1.311	4.25E-03	3.35E-04	--	--
	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-CB-1	14.1	54.1	0.55	0.034	--	--																																																																				
	22-CB-2	14.1	54.1	0.55	0.034	--	--																																																																				
	Emission Unit ID 24 - Conversion																																																																										
	24-1	0.342	1.311	4.25E-03	3.35E-04	--	--																																																																				
	24-2	0.342	1.311	4.25E-03	3.35E-04	--	--																																																																				
	24-3	0.342	1.311	4.25E-03	3.35E-04	--	--																																																																				
24-4	0.342	1.311	4.25E-03	3.35E-04	--	--																																																																					
24-5	0.342	1.311	4.25E-03	3.35E-04	--	--																																																																					
Standard No. 4	<p>Applicable. Emission Units 24-26 are subject to a 20% Opacity limitation because the equipment or associated control devices have been modified or replaced since December 31, 1985.</p> <p>For Emission Unit 24, only the process emissions portion is subject to this standard. Emission Units 24, 25, and 26 do not produce PM emissions. As such, there will be no associated PM emission limit for these sources.</p> <p>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.</p>																																																																										
Standard No. 3 (state only)	<p>Applicable. Although used for material recovery, the incinerator is not considered a furnace as the material that it is recovering does not undergo 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.</p> <p>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.</p>																																																																										



STATEMENT OF BASIS
Page 9 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/Periodic Monitoring Requirements
	<p>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.</p> <p>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.</p> <p>A condition was added to the permit specifying the type of materials that may be combusted, and explicitly excluding waste classified as hazardous.</p>
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	<p>Not Applicable. The boilers will have 0.036 lb/MMBTU NO_x limits for natural gas and 0.15 lb/MMBTU NO_x limits for No. 2 fuel oil.</p> <p>The boilers are subject to a NSPS but it does not apply any NO_x limitations. The boilers are only subject to fuel certification and tune-up requirements.</p>
61-62.6	Applicable. The facility will utilize best practices to minimize fugitive dust emissions.
40 CFR 60 and 61-62.60	<p>Applicable.</p> <p>Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: Applicable. Applicable. The boilers being installed each have a maximum design heat input capacity of 24.5 MMBTU/hr which is within the limits of this regulation.</p> <p>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. Three of these generators were installed prior to June 12, 2006, and are not subject to this standard. Five generators were installed after June 12, 2006 as noted: One (1) 50 kW Emergency Generator was installed in 2011, one (1) 300 kW was installed in 2020, two (2) 550 kW were installed in 2021 and one (1) 300 kW was installed in 2022 and are subject to the requirements of this standard.</p> <p>Subpart E - Standards of Performance for Incinerators: Not Applicable. The loading rate for this incinerator is below the 50 tons/day applicability threshold.</p> <p>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</p>



STATEMENT OF BASIS
Page 10 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

REGULATORY APPLICABILITY REVIEW

Regulations	Comments/Periodic Monitoring Requirements
	<p>and emits nitric acid as part of their process but does not produce the nitric acid being emitted.</p> <p>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.</p> <p>Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries: Not Applicable. This standard applies to calciners and dryers at a 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.</p> <p>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.</p> <p>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”.</p>
40 CFR 61 and 61-62.61	<p>Not Applicable. The facility is not one of the listed subject source categories.</p> <p>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.</p>
40 CFR 63 and 61-62.63	<p>Applicable.</p> <p>Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: Applicable. This standard</p>



STATEMENT OF BASIS
Page 11 of 12
 BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
	<p>applies to facilities which operate a stationary reciprocating internal combustion engine. The facility operates eight (8) Emergency Generators on site.</p> <p>Subpart JJJJJ - 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.</p>
61-62.68	Applicable. This facility stores subject chemicals (aqueous ammonia above 20% conc.) above the threshold quantities. An initial Risk Management Plan was submitted to the US EPA on June 18, 1999 and was approved on July 2 nd , 1999.
40 CFR 64 (CAM)	Not applicable. The facility does not meet the definition of a major source.

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. 8 (state only)	Applicable. Facility has demonstrated compliance through modeling. See modeling summary dated July 11, 2019.

2019 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. Comments were received during the public notice comment period.

Additional Public Participation

BOW and BAQ joint public meeting was held September 26, 2019.

Revisions After Notice

Based on comments received, the permit timeframe was reduced from the standard 10-years to 5-years.

2023 PUBLIC NOTICE

This State Operating Permit has undergone a 30-day public notice period, in accordance with SC Regulation 61-62.1, Section II(N). The comment period was open from May 5, 2023 to June 18, 2023 and was placed on the BAQ website during that time period. Comments were received during the comment period.



STATEMENT OF BASIS
Page 12 of 12
BAQ Air Permitting Division

Company Name:	Westinghouse Electric Company LLC	Permit Writer:	Austin Goode
Agency Air Number:	1900-0050	Date:	September 15, 2023
Permit Number:	OP-1900-0050 v2.0		

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.