



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 2 2011

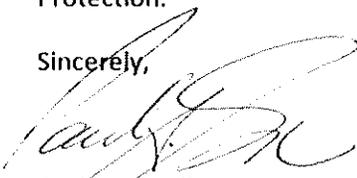
Mr. Frank Marcinowski
Deputy Assistant Secretary for
Technical and Regulatory Support
U. S. Department of Energy
Office of Environmental Management
1000 Independence Avenue S.W.
Washington DC 20585

Dear Mr. Marcinowski:

We have completed review of the two documents, *Separations Process Research Unit – Disposition Project (SPRU-DP) Radioactive Air Emissions Application for Approval to Construct or Modify Portable Ventilations Units, Revision 2*, dated May 18, 2011, and the *Quality Assurance Project Plan for Measurements of Radionuclide Air Concentrations for Rad-NESHAP Compliance at the SPRU-DP*, dated May 18, 2011, you transmitted on May 23, 2011, for our review and approval pursuant to 40 CFR Part 61, Subpart H.

Please find enclosed the approval of the application to construct or modify Portable Ventilation Units, KAPL-SPRU-PVU-001, signed by Kevin C. Bricke, Acting Director, Division of Environmental Planning and Protection.

Sincerely,



Paul A. Giardina
Chief

Radiation and Indoor Air Branch

c: S. Feinberg, DOE-SPRU

Enclosure

KAPL-SPRU-PVU-01
Portable Ventilation Units (PVU)
Approval to Construct/Modify
Sources of Airborne Radionuclide Emissions

In compliance with provisions of the Clean Air Act, as amended (42 U.S.C. §7401 et seq.), the Department of Energy (DOE) Separations Process Research Unit Field Office is granted approval to construct/modify source KAPL-SPRU-PVU-01 for the Separations Process Research Unit Disposition Project located at the Knolls Atomic Power Laboratory in Niskayuna, New York.

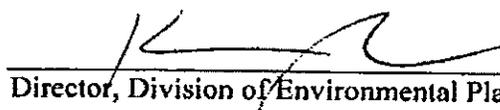
This approval is granted in accordance with the plans and materials submitted with the application and with Federal regulations governing the "National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities" (40 CFR Part 61, Subpart H). Any conditions attached to this document are considered part of this approval.

Failure to comply with any conditions or terms set forth in this approval may result in sanctions available under the authority of Section 1-604 of Executive Order 12088, as well as enforcement procedures established by the Clean Air Act.

This approval to construct/modify grants no relief from the responsibility for compliance with other applicable provisions of Federal regulations. This approval shall be effective immediately after receipt of the approval to construct/modify by the applicant.

Dated

8/2/11


Director, Division of Environmental Planning and Protection

CONDITIONS

I. Emergency Notification

- A. In the event of an accidental/unplanned release of radionuclides which leads to an air emission that may cause the standards of 40 CFR 61 to be exceeded; or may result in a health threat to the public; the Department of Energy (DOE) Separations Process Research Unit (SPRU) Field Office shall make timely notification to state, local, and Federal agencies.

- B. Initial telephone notification should include the time of the accidental release; location of accident/release; estimate of quantity released; emergency steps taken to contain/control the release; type of assistance needed; and the name and title of person reporting the incident. A brief written summary of the event shall be submitted to Director, Division of Environmental Planning and Protection (Attn: Regional Radiation Program Manager) within 30 days of the event.

- C. EPA Phone Notification - In Order of Preference
 - 1. Regional Radiation Program Manager
Paul A. Giardina
212-637-4010
 - 2. Health Physicist
Jeanette Eng
212-637-3765
 - 3. National Response Center
800-424-8802

- D. New York State Phone Notification - In Order of Preference
 - 1. NYS Department of Health
Director, Bureau of Environmental Radiation Protection
Stephen Gavitt
518-402-7550
 - 2. NYS Department of Environmental Conservation
Chief, Radiological Sites Section
Timothy Rice
518-402-8579
 - 3. New York State Warning Point
518-457-2200

II. Permit Expiration

- A. Approval to construct/modify is not transferable to another owner/operator.
- B. The DOE may submit to the Regional Administrator (Region 2 Environmental Planning and Protection Division Director) a written application for a determination of whether actions intended to be taken by the KAPL-SPRU constitutes a modification or construction of a source subject to the standard. The Regional Administrator will notify the owner/operator of his determination within 30 days after sufficient information to evaluate the application (40 CFR 61.06).
- C. If intended actions to be taken by the KAPL-SPRU are determined to constitute construction/modification which effects existing permitted sources, the permit and conditions shall supersede and/or amend the existing permit.
- D. Updates in notification requirements and phone contracts supersede previous permit conditions.

III. Other Notifications

The owner/operator shall provide written notification to EPA Region 2 as follows.

- 1. The 30-day notification of startup.
- 2. SPRU shall maintain records of Portable Ventilation Unit (PVU) usage and monitoring of airborne emissions during operations. A summary of PVU usage and emissions shall be included in yearly report of emissions which is submitted to EPA. A copy of this report shall be submitted directly to EPA Region 2.
- 3. Within five working days, notification and documentation of the calculated cumulative PVU dose estimate exceeding $1.2E-03$ mrem per year to the MEOSI.

IV. Operations/Maintenance

- A. Operations, testing and maintenance described in the application and associated correspondence shall apply.
 - a. Use of ten portable ventilation units (PVUs).
- B. The facility owner/operator shall maintain all equipment, facilities, and systems installed or used to achieve compliance with the emission standard set forth in 40 CFR 61.92, in accordance with 40 CFR 61 Subpart H, your application and associated correspondence, and in a manner consistent with good air pollution control practices for minimizing emissions.

- C. Records of operations, maintenance, inspection, testing, repair, monitoring data, and Standard Operating Procedures for conducting such activities shall be maintained pursuant to 40 CFR Part 61 and the CAA and provided to EPA Region 2 upon request.
- D. Correspondence associated with KAPL-SPRU
 - a. May 23, 2011, F. Marcinowski to P.A. Giardina, "Separations Process Research Unit - Disposition Project (SPRU-DP) Radioactive Air Emissions Application for Approval to Construct or Modify Portable Ventilation Units Environmental Engineering/Evaluation Calculations", SPRU EEC-11-001 Revision 1, dated May 18, 2011.
 - b. May 23, 2011, F. Marcinowski to P.A. Giardina, "Quality Assurance Project Plan for Measurements of Radionuclide Air Concentrations for Rad-NESHAP Compliance at the SPRU-DP", SPRU-ENV-012 Revision 2, dated May 18, 2011.
 - c. July 11, 2011, J. Eng to S. Feinberg, "Request for Additional Information for PVU Application", email dated July 11, 2011.
 - d. July 20, 2011, H. Davis to J. Eng, "Response to EPA Request for Additional Information SPRU PUV Application", email dated July 20, 2011.
 - e. July 29, 2011, S. Feinberg to J. Eng, "Clarifying Responses to EPA Questions on the Portable Ventilation Units", email dated July 29, 2011.

V. Severability

The provisions of this approval to construct/modify are severable, and, if any provision of this approval to construct/modify is held invalid, the remainder of this approval to construct/modify shall not be affected thereby.

VI. Other Applicable Regulations

The owner/operator shall construct and operate the source in compliance with all other applicable provisions of the CAA and regulations promulgated thereunder.

VI. Agency Notification

All correspondence as required by this approval to construct/modify shall be sent to:

U.S. Environmental Protection Agency
Director, Division of Environmental Planning & Protection
Attention: Regional Radiation Program Manager
290 Broadway
New York, NY 10007