

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

PO Box 3487 Aiken, South Carolina 29802 Phone (803) 644-6953 Fax (803) 644-7369
Email: donmoniak@earthlink.net Website: www.bredl.org

January 15, 2002

Mr. Brett M. Caswell
Division of Engineering Services, Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street,
Columbia, South Carolina 29201.
Brett Caswell CASWELBM@COLUMB31.DHEC.STATE.SC.US

RE: AIR PERMIT #TV-0080-0041. Savannah River Site (SRS).

BREDL Comment #1

**12/21/01 NOTICE OF PROPOSED ISSUANCE OF A
PART 70 AIR QUALITY (TITLE V OPERATING) PERMIT
UNITED STATES DEPARTMENT OF ENERGY -
WESTINGHOUSE SAVANNAH RIVER COMPANY
(SAVANNAH RIVER SITE)**

Dear Mr. Caswell,

On behalf of the Blue Ridge Environmental Defense League (BREDL), I hereby make the following initial comments and request pertaining to the DRAFT Clean Air Act Title V Operating Permit for the Department of Energy's (DOE) Savannah River Site (SRS) issued on December 21, 2001 by the South Carolina Department of Health and Environmental Quality (DHEC).

Request for Extension of Public Comment Period

BREDL hereby requests that SC DHEC extend the public comment period—scheduled to end on January 21, 2001--by another 30 days to February 21, 2002. The rationale for this request is as follows:

- a. The purpose of the Title V permit program is to gather all existing, federally enforceable laws and regulations into one permit. While hundreds of these permits have been issued, the SRS Title V permit has few if any precedents. Unlike the typical Title V permit that pertains to private enterprises and is privately funded, SRS is a federally owned nuclear weapons production site consisting of numerous facilities spread across a 300-square-mile area. The cost of the permit application and permit preparation are public costs, part of the \$1.3 to \$1.5 billion/year in federal funding received by SRS.

- b. The Draft Title V permit is a voluminous and complex document that was prepared over a period of five years, during which time there were at least twelve amendments filed by SRS to DHEC. The allowance of 30 days for public review of a document that took DHEC years to prepare is insufficient.
- c. There is a historically high level of public interest in SRS operations. This Clean Air Act Title V Permit process represents an historic opportunity for citizens to learn about the SRS in its entirety, assess for themselves the cumulative environmental impacts of ongoing operations, and determine whether this permit will improve and insure that SRS obeys the Clean Air Act.
- d. Savannah River Site is situated in three counties in South Carolina (Aiken, Barnwell, and Allendale) and straddles the South Carolina-Georgia border. In spite of this, DHEC chose to publish its December 21, 2001 notice in only one newspaper, the *Aiken Standard*. This is a violation of 40CFR70.7(h)(1) because the *Aiken Standard* is not “a newspaper of general circulation in the area where the source is located.” The newspapers of general circulation throughout the source area, are the *Augusta Chronicle*, and Barnwell is additionally served by a bi-weekly newspaper.
- e. The public notice provisions in the Clean Air Act (40CFR70.7(h)(4)) mandate a minimum 30-day public notice period, but do not prohibit longer periods for comment: “*The permitting authority shall provide at least 30 days for public comment and give notice of any public hearing at least 30 days in advance of the hearing.*”
- f. The NOTICE OF PROPOSED ISSUANCE was published on December 21, 2001, during the height of the holiday season. The timing of this notice fails to meet the spirit of “adequacy” provision for public participation mandated by the Clean Air Act. The timing also presents the appearance of the State of South Carolina trying to evade public comment and scrutiny of the Savannah River Site.

BREDL expects DHEC to publish additional public notices pertaining to this draft permit issuance. If we can be of any assistance in identifying the location for those publications feel free to contact us. Thank you for taking this under consideration and we look forward to your response.

Sincerely,

Don Moniak
Community Organizer and SRS Project Coordinator
Blue Ridge Environmental Defense League.

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PO Box 3487 Aiken, South Carolina 29802 Phone (803) 644-6953 Fax (803) 644-7369
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February 20, 2002

Mr. Brett M. Caswell
Division of Engineering Services, Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street,
Columbia, South Carolina 29201.
Brett Caswell CASWELBM@COLUMB31.DHEC.STATE.SC.US

RE: AIR PERMIT #TV-0080-0041. Savannah River Site (SRS).

BREDL Comment #2

**12/21/01 NOTICE OF PROPOSED ISSUANCE OF A
PART 70 AIR QUALITY (TITLE V OPERATING) PERMIT
UNITED STATES DEPARTMENT OF ENERGY -
WESTINGHOUSE SAVANNAH RIVER COMPANY
(SAVANNAH RIVER SITE)**

Subject: Questions Answered and Left Unanswered

Dear Mr. Caswell,

On behalf of the Blue Ridge Environmental Defense League (BREDL), I hereby make the following comments pertaining to the DRAFT Clean Air Act Title V Operating Permit for the Department of Energy's (DOE) Savannah River Site (SRS) issued on December 21, 2001 by the South Carolina Department of Health and Environmental Quality (DHEC):

Unanswered Questions Submitted as Comments

Comment 2-1: On January 22 I emailed the following regarding the lack of correspondence between the air pollutant stacks in Attachment A and the listing of stacks in the Tables in Equipment Tables in Section 5. DHEC and EPA should address this issue and clarify the discrepancies.

“From: Self <donmoniak@earthlink.net>
To: brett Caswell
<CASWELBM@COLUMB31.DHEC.STATE.SC.US>
Subject: Question about SRS permit
Copies to: scott Miller <miller.scott@epa.gov>
Date sent: Tue, 22 Jan 2002 13:21:46 -0500

Dear Brett,

I have a question about the differences in stack identities found in Attachment A vs. what is found in Section 5 Equipment descriptions:

a. Many of the stacks identified in Attachment A do not appear to be listed anywhere else. Are there stacks in Attachment A that are not identified elsewhere or am I missing something? Do these correspond to insignificant activities list? (latter does not cite stack IDs).

Examples include:
EWP-004, F-WTxxx (Waste Tanks?), F-QT-002, etc.

I used Quattro to work with Attachment A data. When I sorted by stack to determine pollutants by stack, most of the stacks were unrecognizable. I can send this particular worksheet if necessary.

b. On the flipside, it appears that some of the major units and stacks listed in Section 5 are absent in Attachment A.

If you could clarify this I would appreciate it.

Thank you,

Don Moniak”

Comment 2.2. Questions Answered But Concerns Remain. The following emails reflect correspondence during the original comment period. DHEC and EPA should address the problem of very low emissions of highly toxic pollutants that were cited as "0" as described below. These toxins include beryllium and mercury.

Date sent: Tue, 15 Jan 2002 13:21:42 -0500
From: "Brett Caswell"
<CASWELBM@COLUMB31.DHEC.STATE.SC.US>
To: <donmoniak@earthlink.net>
Copies to: "Karla A. York" <YORKCA@columb20.dhec.state.sc.us>
Subject: SRS Title V Permit

THE ANSWERS TO YOUR QUESTIONS (THUS FAR) APPEARS BELOW.

>>> <donmoniak@earthlink.net> 01/15/02 12:18PM >>>

1) On the very last page, Attachment C, it states:

Applicable and Non-Applicable Federal and State Regulations The following contains the Federal and South Carolina air pollution regulations which were specified in the Part 70 permit application and determined as applicable and non-applicable by the Department as of the date of this permit issuance. This attachment may be revised by the Department in the event of a change in the nature or emission of pollutants at the source or promulgation of new or revised regulations.

Where is this attached list?

THE ATTACHED LIST IS IN HARD COPY FORMAT ONLY AND IS 253 PAGES LONG. IT IS AVAILABLE FOR YOUR VIEWING AT THE DISTRICT OFFICE, THE ADDRESS OF WHICH WAS GIVEN IN A PREVIOUS E-MAIL. I CAN FAX IT TO YOU, BUT FOR OBVIOUS REASONS, THAT WILL TAKE SOME TIME TO DO.

2) Where is there a description of the methods used to determine these numbers? Are these maximums or are they what is permitted?

THE DESCRIPTION OF THE NUMBERS ARE IN MY NOTES, AND THE TEXT THAT APPEARS FOLLOWS. I THINK THIS WILL ANSWER BOTH QUESTIONS.

"Note: Potential HAPs are not in the tables above because they are best estimated by using the modeled emission rate in Attachment A of the permit and assuming 8,760 hours/year (that is 24 hours/day for 365 days/year) of operation.

The following 247 Toxic Air Pollutants (TAPs) as found in SC Regulation 61-62.5, Standard 8 were noted from Attachment A. It should be noted that Standard 8 includes the Federal HAPs list (42 U.S.C. 112(b)) plus other pollutants which South Carolina deems as having some level of toxicity (either Cat 1: Low Toxicity - Those pollutants which cause readily reversible changes which disappear after exposure ends; Cat 2: Moderate Toxicity - Those pollutants which may cause chronic reversible or irreversible changes that are not severe enough to result in death or permanent injury; OR Cat 3: High Toxicity - Those pollutants which may cause chronic effects that result in death or permanent injury after very short exposure to small quantities). SRS has complied with the allowable ambient air concentrations of each of the following toxic air pollutants beyond the plant property line as determined by air dispersion modeling."

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<table appears here>

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"The following 176 Hazardous Air Pollutants (HAPs) as found in Section 112(b) of the 1990 Clean Air Act Amendments were noted from Attachment A (as a subset of the 247 TAPs), and their calculated potential TPY value appears below. It should be noted that while a facility may model for these pollutants, they may not be emitted in the quantities indicated, and in some cases may not be actually emitted at all. Nevertheless, in the absence of other data, it is the Bureau's determination that those pollutants which are highlighted in the table below are those for which SRS shall be considered major (that is above the 10 TPY threshold)."

<table>

3) Regarding Attachment A:

2-1: If the modeled emission showed "0", why were they modeled?

GOOD QUESTION.

WHAT YOU ACTUALLY SEE IN THE TABLE IS A NUMBER THAT IS LESS THAN 0.00005 LB/HR, AND NOT ZERO. THE ORIGINAL FORMAT HAD SCIENTIFIC NOTATION (I.E. 5E-05), BUT TO MAKE THE READING OF THE ATTACHMENT EASIER, I REFORMATTED SO THAT THE NUMBERS ONLY GO OUT TO 4 DECIMAL PLACES. IN THE FINAL VERSION, IT WAS AGREED WITH SRS THAT SOURCES LESS THAN THIS VALUE WOULD BE DELETED FROM THE ATTACHMENT.

LET ME KNOW IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS.

~Brett"

Sincerely,

Don Moniak
Community Organizer and SRS Project Coordinator
Blue Ridge Environmental Defense League.

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January 15, 2002

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Brett Caswell CASWELBM@COLUMB31.DHEC.STATE.SC.US

RE: AIR PERMIT #TV-0080-0041. Savannah River Site (SRS).

BREDL Comment #3
Regarding High Level Waste Tanks
12/21/01 NOTICE OF PROPOSED ISSUANCE OF A
PART 70 AIR QUALITY (TITLE V OPERATING) PERMIT
UNITED STATES DEPARTMENT OF ENERGY -
WESTINGHOUSE SAVANNAH RIVER COMPANY
(SAVANNAH RIVER SITE)

Dear Mr. Caswell,

On behalf of the Blue Ridge Environmental Defense League (BREDL), I hereby make the following comments pertaining to the DRAFT Clean Air Act Title V Operating Permit for the Department of Energy's (DOE) Savannah River Site (SRS) issued on December 21, 2001 by the South Carolina Department of Health and Environmental Quality (DHEC).

High Level Waste Tanks

High level radioactive waste tanks in F and H areas are identified as "insignificant activities" (Attachment B, Pages 11,12, 21) because the emission level was determined to be below concern. The justification for this determination is not identified in the draft permit.

At least one technical report by Westinghouse Savannah River Company addresses this issue.¹ BREDL request that DHEC and EPA compare the methodologies reported in the

¹ WSRC-TR-2001-00375 Page 2. Revision 0 *Ventilated Tank Source Term Determination*

Title V Application to the results in this report and determine if these facilities warrant the proposed exemptions for radionuclides and other pollutants.

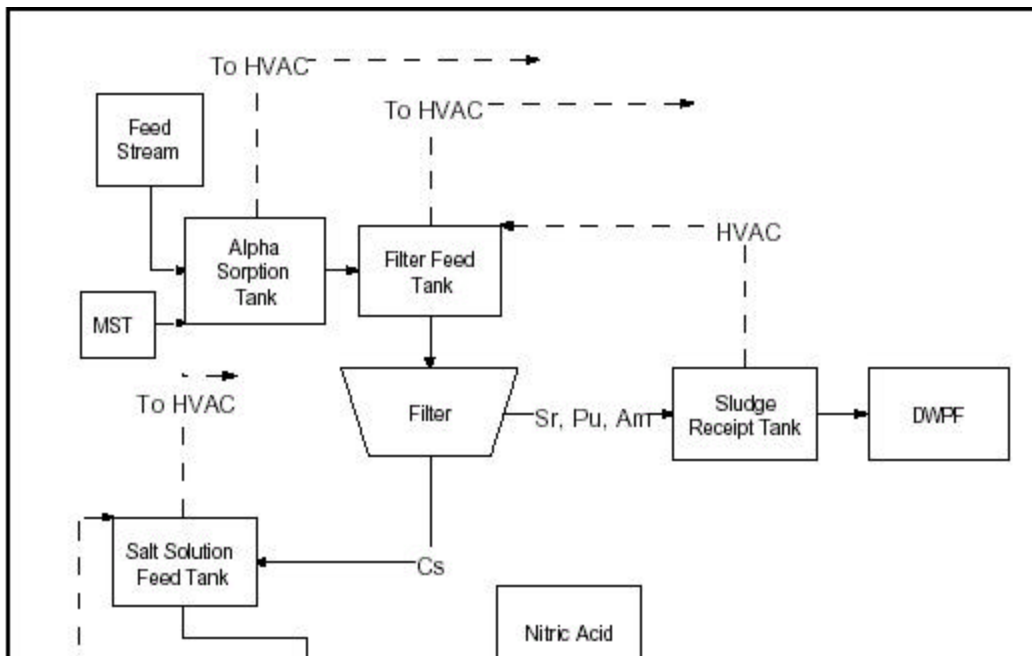
In *Ventilated Tank Source Term Determination*, it states:

“Purpose

This calculation estimates the design emissions of radionuclides from Ventilated Tanks used by various facilities. The calculation includes emissions due to processing and storage of radionuclide material.

Background

Various operations with radionuclide containing material involves the use of tanks with active ventilation systems. The tanks addressed by this calculation are fixed roof and horizontal type tanks. The non-ventilated versions of these type of tanks are addressed in “Compilation of Air Pollutant Emission Factors, AP42” published by the Environmental Protection Agency (EPA). AP42 uses the vapor pressure of the material in the tank to estimate emissions. Because the tanks in AP42 are not ventilated, the passive losses must be estimated by factors affecting breathing loss and fill rate. For the ventilated tanks the losses are not passive, but active and are determined by the ventilation flow rate.”



“INTRODUCTION

The High Level Waste Tank Farms store and process high-level liquid wastes from a number of sources including F- and H-Canyons. These wastes are made alkaline prior to transfer to the Tank Farm and are subject to acceptance based on their composition. These wastes may contain significant concentrations of ammonia from flushing of the process vessel vent system.²”

Sincerely,

Don Moniak
Community Organizer and SRS Project Coordinator
Blue Ridge Environmental Defense League.