

Statement of Basis For Title V Permit

Company Name	United States Enrichment Corporation (USEC) a.k.a., Portsmouth Gaseous Diffusion Plant	
Premise Number	0666000000	
What makes this facility a Title V facility?	PE, NOx, SO2, and CO	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	YES	
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
Emissions units B001, B002, and B003 are not currently subject to the requirements specified in 40 CFR Part 60, Subparts D and Da, because construction did not commence and modifications were not made after the effective dates of these Subparts.	N	Y	NSPS 40 CFR Part 60, Subparts D and Da
This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.	25	N	

<p>The permittee, including the U.S. Department of Energy (USDOE or DOE), U.S. Enrichment Corporation (USEC), and any additional facility or organization entering into a contractual agreement for work or ownership at this site, shall comply with all the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 61, including Subparts A and H.</p> <p>All release points which have a potential to discharge radionuclides into the air in quantities which could cause an effective dose equivalent in excess of 1% of the standard shall be measured. All radionuclides which could contribute greater than 10% of the potential effective dose equivalent, for each release point, shall be measured.</p> <p>Radionuclide emissions shall be directly monitored or extracted, collected and measured using procedures outlined in 40 CFR 61.93(b), following the guidance presented in ANSIN13.1-1969 "Guide to Sampling Airborne Radioactive Material in Nuclear Facilities". Radionuclides shall be collected and measured using procedures based on the principles of measurement described in appendix B, Method 114. Periodic sampling or alternative air dispersion calculations and/or sampling measurements shall be used only</p>	<p>N</p>	<p>Y</p>	<p>NESHAP'S 40 CFR 61, including Subparts A and H.</p>
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C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State & Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP 3745-	Other												
B001, B002, and B003	Sulfur dioxide emissions shall not exceed 6.16 lbs/mmBtu actual heat input.	18-72 (B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

<p>B001, B002, and B003</p>	<p>Particulate emissions shall not exceed 0.19 pound per mmBtu of actual heat input, based on the total combined heat input from boilers B001, B002, and B003.</p>	<p>17-10 (C)(2)</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>N</p>	
<p>B001, B002, and B003</p>	<p>Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.</p>	<p>17-07 (A)</p>	<p>N</p>	<p>N</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>N</p>	

P170, P171, P172, P173, P174, P175, P176, P177, P187, P179, P180, P202, P367, P388, P389, P424, P425, P426, P427, P429, P430, P440, P441, P442, P443, P445, P446, P448, P449, P450, P451, P454, P456, P457, P458, P459, P460, P461, P462, P465, P466, P469, P471, and P472	Pursuant to 40 CFR 61, Subparts A and H, emissions of radionuclides to the ambient air from any buildings, structures, and operations on the contiguous site, shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent of 10 mrem/yr.	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	Y	<p>Basis - NESHAP's 40 CFR 61, including Subparts A and H.</p> <p>Misc - If the facility is not in compliance with the emission standard from 40 CFR 61.92 in the calendar year covered by the report, then the facility must commence reporting to the Administrator on a monthly basis the information listed in paragraph (b) of this section, for the preceding month. These reports will start the month immediately following the submittal of the annual report for the year in noncompliance, and will be due 30 days following the end of each month. This increased level of reporting will continue until the Administrator has determined that the monthly reports are no longer necessary. In addition to all the information required in Section IV.1 of this permit, monthly reports shall also include the following information:</p> <p style="padding-left: 40px;">a. All controls or other changes in operation of the facility that will be or are being installed to bring the facility into compliance; and</p> <p style="padding-left: 40px;">b. If the facility is under a judicial or administrative enforcement decree, the report will describe the facility's performance under the terms of the decree.</p> <p>In those instances where the information requested is classified, such information will be made available to the EPA separate from the report, and will be handled and controlled according to applicable security and classification regulations and requirements.</p>
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<p>N002, P040, P041, P042, P045, P053, P065, P067, P117, P468, P473, and P474</p>	<p>Pursuant to 40 CFR 61, Subparts A and H, emissions of radionuclides to the ambient air from any buildings, structures, and operations on the contiguous site, shall not exceed those amounts that would cause any member of the public to receive in any year an effective dose equivalent of 10 mrem/yr.</p>	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	Y	<p>Basis - NESHAP's 40 CFR 61, including Subparts A and H. and OAC 3745-31-05(A)(3)</p> <p>Misc - If the facility is not in compliance with the emission standard from 40 CFR 61.92 in the calendar year covered by the report, then the facility must commence reporting to the Administrator on a monthly basis the information listed in paragraph (b) of this section, for the preceding month. These reports will start the month immediately following the submittal of the annual report for the year in noncompliance, and will be due 30 days following the end of each month. This increased level of reporting will continue until the Administrator has determined that the monthly reports are no longer necessary. In addition to all the information required in Section IV.1 of this permit, monthly reports shall also include the following information:</p> <p style="padding-left: 40px;">a. All controls or other changes in operation of the facility that will be or are being installed to bring the facility into compliance; and</p> <p style="padding-left: 40px;">b. If the facility is under a judicial or administrative enforcement decree, the report will describe the facility's performance under the terms of the decree.</p> <p>In those instances where the information requested is classified, such information will be made available to the EPA separate from the report, and will be handled and controlled according to applicable security and classification regulations and requirements.</p>
N002	<p>Sulfur Dioxide Emissions shall not exceed 0.5 pounds per hour; Nitrogen Oxide emissions shall not exceed 0.4 pounds per hour</p>	N	Y	N	N	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - OAC 3745-31-05(A)(3)</p>

N002	PE shall not exceed 0.1 pounds per 100 pounds charged	17-09(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
N002	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
B016, and B022	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

B016, and B022	*Particulate emissions shall not exceed 0.35 lb/mmBtu actual heat input./ Particulate emissions shall not exceed 0.062 lb/mmBtu actual heat input.	17-11 (B)(5)(b)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	*The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
Z032	N/A														

<p>P463</p>	<p>Emissions of sulfur dioxides (SO₂) shall not exceed 2.05 lbs/hour and 2.6 TPY.</p> <p>Emissions of nitrogen oxides (NO_x) shall not exceed 31.17 lbs/hour and 39.9 TPY.</p> <p>Emissions of carbon monoxide (CO) shall not exceed 6.72 lbs/hour and 8.6 TPY.</p> <p>Emissions of volatile organic compounds (VOC) shall not exceed 2.52 lbs/hour and 3.3 TPY.</p> <p>PE shall not exceed 2.19 lbs/hr and 2.8 TPY.</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>Y</p>	<p>N</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Y</p>	<p>N</p>	<p>Basis - OAC 3745-31-05(A)(3) OR - The permittee shall use only low sulfur # 2 diesel fuel to run this emissions unit. The maximum 12-month period fuel usage for this emission unit shall not exceed 132,384 gallons for any rolling 12-month period. This emission unit shall burn only low sulfur # 2 diesel fuel, where the sulfur content does not exceed 0.05 percent.</p>
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P463	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall use only low sulfur # 2 diesel fuel to run this emissions unit.
P463	The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices"	23-06	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

P464	<p>Emissions of sulfur dioxides (SO₂) shall not exceed 0.027 lbs/hour and 0.12 TPY.</p> <p>Emissions of nitrogen oxides (NO_x) shall not exceed 2.29 lbs/hour and 10.0 TPY.</p> <p>Emissions of carbon monoxide (CO) shall not exceed 0.50 lbs/hour and 2.2 TPY.</p> <p>Emissions of volatile organic compounds (VOC) shall not exceed 0.19 lbs/hour and 0.8 TPY.</p> <p>PE shall not exceed 0.16 lb/hr and 0.7 TPY.</p>	N	Y	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>Basis - OAC 3745-31-05(A)(3) OR - The permittee shall use only low sulfur # 2 diesel fuel to run this emissions unit. This emission unit shall burn only low sulfur # 2 diesel fuel, where the sulfur content does not exceed 0.05 percent.</p>
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P464	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The permittee shall use only low sulfur # 2 diesel fuel to run this emissions unit.
P464	The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices"	23-06	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

P463	<p>Particulate emissions shall not exceed 0.35 lb/million Btu actual heat input.</p> <p>Particulate emissions shall not exceed 0.062 lb/million Btu actual heat input.</p>	17-11(B)(5)(b)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
P464	<p>Particulate emissions shall not exceed 0.25 lb/million Btu actual heat input.</p> <p>Particulate emissions shall not exceed 0.310 lb/million Btu actual heat input.</p>	17-11(B)(5)(a)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.