

## Flexible Permit

### Source Analysis & Technical Review

Company	<b>Us Department Of Energy</b>	Permit Number	<b>84802</b>
City	<b>Panhandle</b>	Project Number	<b>138104</b>
County	<b>Carson</b>	Account Number	<b>CF-0019-W</b>
Project Type	<b>Initial</b>	Regulated Entity Number	<b>RN100210756</b>
Project Reviewer	<b>Mr. John Barrientez</b>	Customer Reference Number	<b>CN600125009</b>

Site Name **Pantex Plant**

### Project Overview

### Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	<b>3/12/2009</b>
Compliance period:	<b>4/28/2003 - 4/28/2008</b>
Site rating & classification:	<b>1.29, average</b>
Company rating & classification:	<b>0.34, average</b>
If the rating is 40<RATING<45, what was the outcome, if any, based on the findings in the formal report:	
Has the permit changed on the basis of the compliance history or rating?	<b>No</b>

### Public Notice Information - 30 TAC Chapter 39 Rules

#### Rule Citation Requirement

39.403	Date Application Received:	<b>April 28, 2008</b>
	Date Administratively Complete:	<b>May 2, 2008</b>
	Small Business Source?	<b>No</b>
	Date Leg Letters mailed:	<b>May 2, 2008</b>
39.603	Date Published:	<b>May 22, 2008</b>
	Publication Name:	<b>Amarillo Globe News</b>
	Pollutants:	<b>CO, NOx, VOC, SO2, PM, HF</b>
	Date Affidavits/Copies Received:	<b>June 4, 2008</b>
	Is bilingual notice required?	<b>No</b>
	Date Certification of Sign Posting / Application Availability Received:	<b>July 3, 2008</b>
39.604	Public Comments Received?	<b>No</b>
	Hearing Requested?	<b>No</b>

	Meeting Request?	<b>No</b>
	Date Response to Comments sent to OCC:	
	Consideration of Comments:	
	Is 2nd Public Notice required?	<b>No</b>
39.419	If no, give reason:	<b>No comments one 1st notice and no major modification</b>

## Flexible Permit & Amendment Requirements - 30 TAC Chapter 116 Rules

### Rule Citation Requirement

116.711(7)	Is the facility expected to perform as represented in the application?	<b>Yes</b>
116.711(1)	Are emissions from this facility expected to comply with all TCEQ air quality Rules & Regulations, and the intent of the Texas Clean Air Act?	<b>Yes</b>
116.711(2)	Emissions will be measured using the following method:	<b>calculation, SC# 9 requires monthly emissions calculations to show compliance with the flex caps.</b>
	Comments on emission verification:	
116.711(4)	Subject to NSPS? <b>No NSPS apply to this facility</b>	
116.711(5)	Subject to NESHAPS? <b>No NESHAPs apply to this facility</b>	
116.711(6)	Subject to NESHAPS (MACT) for source categories? <b>No MACT requirements apply to this facility.</b>	
116.711(8)	Is nonattainment review required?	<b>No, site located in an attainment area</b>
116.111(2)(I)	Is PSD applicable?	<b>No, project increase are not significant.</b>
116.711(12)	Is Mass Emissions Cap and Trade applicable to the new or modified facilities?	<b>No</b>
	If yes, did the proposed facility, group of facilities, or account obtain allowances to operate:	<b>Not needed</b>
116.750	Permit Fee: \$ <b>900</b>	Fee certification: <b>4/28/2008</b>

## Title V Applicability - 30 TAC Chapter 122 Rules

Rule Citation	Requirement	
122.10(13)(A)	Is the site a major source under FCAA Section 112(b)?	<b>No</b>
	Does the site emit 10 tons or more of any single HAP?	<b>No</b>
	Does the site emit 25 tons or more of a combination?	<b>No</b>
122.10(13)(C)	Does the site emit 100 tons or more of any air pollutant?	<b>No</b>
122.10(13)(D)	Is the site a non-attainment major source?	<b>No</b>
122.602	<b>Periodic Monitoring (PM) applicability:</b> <b>Site is a minor source, not a Title V source.</b>	
122.604	<b>Compliance Assurance Monitoring (CAM) applicability:</b> <b>Site is a minor source, not a Title V source.</b>	

## Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	1	Joe Campa	Region required several recordkeeping conditions be added.
Toxicology:	O.K.		

## Process/Project Description

U.S. Department of Energy- Pantex Plant has applied for a flexible air permit. The permit process involves consolidating two existing air permits, 5337 and 21233. Permit Number 21233 covers open burning operations and explosives manufacturing operations. Permit 5337 covers the generators and boilers. Portions of the facility are covered by the Hazardous Waste Permit HW-50284. The air portion of that permit was pulled out and listed in this flex permit. Several PBR's are being rolled in as well. The Pantex facility is located just outside of Amarillo. MSS emissions include maintenance of refrigeration units, repair and replacement of natural gas lines and the periodic purging of two Van de Graff generators. The MSS emissions are mainly from refrigerants which are small (<2 TPY) and are much smaller than the reportable quantities currently listed 30 TAC 101. No additional MSS specific BACT requirements were added for maintenance activities.

The facility basically receives explosives, propellants, pyrotechnics and destroys them. Much of the process description is listed as confidential.

## Pollution Prevention, Sources, Controls and BACT- [30 TAC 116.711(3)]

Emissions caps were based on average BACT. Individual sources do not have BACT limitations in the permit. Special Condition No. 9 requires monthly emissions calculations on a rolling 12 month basis for all sources covered by this flexible permit.

The facility contains the following sources:

Dual Chamber Incinerator: Required to keep a chamber minimum temperature of 1200 deg F. previously under PBR

Cooling Towers: 17 cooling Towers in the permit all non-contact, no sampling required. All previously under PBR.

Plastics shop-abrasive blasting, casting, painting, cutting, welding operations. All previously under several non-registered PBR's.

Vehicle Fueling Facility which contains 15,000 gal gasoline tank, 15,000 gallon biodiesel tank and a 10, 000 gal alternative fuel tank. All previously under PBR.

3 stationary engines to supply raw water and treated water for the plant. Engines rated at less than 600 hp each. Previously under PBR.

A Drying Oven is used at the site. Previously under PBR.

Small horizontal tanks for storage of liquid waste streams. In Permit 21233.

Four Boilers used to produce steam for the site. Each one is rated at less than 40 MM BTU/hr. In Permit 18379.

Three standby diesel generators each rated at 1100 KW.

Firing Sites/Firing Chambers

Burning Ground

Hazardous Waste Treatment and Processing Facility

Microwave Furnace

Hazardous Waste Container Storage Areas

Maintenance Startup and Shutdown Emissions-includes maintenance on refrigeration units, repair and replacement of natural gas lines and periodic purging of two generators. These pieces of equipment are identified in Attachments A and B of the Permit.

Chemical flexibility Chemical Condition No. 5 was added to allow units identified in Table 1 of the permit to utilize additional compounds.

Chemical Flexibility Condition 6 is carried over from the RCRA permit. It allows for additional compound usage similar to Special Condition No. 5 however it is more geared towards energetics.

### Impacts Evaluation - 30 TAC 116.711(10)

Was modeling conducted?	<b>Yes</b>	Type of Modeling:	<b>Plantwide, Full Dispersion</b>
Will GLC of any air contaminant cause violation of NAAQS?	<b>No</b>		
Is this a sensitive location with respect to nuisance?	<b>No</b>		
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?	<b>No</b>		
Additional site/land use information: <b>none</b>			

### Summary of Modeling Results

All modeled impacts were acceptable to the Toxicology Division. See attached Toxicology interoffice memo .

### Permit Concurrence and Related Authorization Actions

Is the applicant in agreement with special conditions?	<b>Yes</b>
Company representative(s):	<b>Bob Pankratz</b>
Contacted Via:	<b>phone</b>
Date of contact:	<b>4/13/2009</b>
Other permit(s) or permits by rule affected by this action:	<b>Air Permits :21233, 18379 PBR registrations: 53377, 53378, 55254,48297,82561.</b>

Project Reviewer

Date

Team Leader/Section Manager/Backup

Date