



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

January 21, 2004

Certified Mail No. 7099 3220 0009 1975 2539

Teresa Perkins
Director
INEEL
P. O. Box 1625
Idaho Falls, ID 83415-3000

RE: Facility ID No. 023-00001, INEEL
Final Permit Letter

Dear Ms. Perkins:

The Idaho Department of Environmental Quality (DEQ) is issuing modified Permit to Construct (PTC) Number P-030505 for INEEL, CPP-606, in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit is effective immediately and is based on your permit application received on February 27, 2003. This permit replaces Permit to Construct 023-00001, issued on June 26, 2000.

This permit does not release INEEL from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Michael Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "R. Wilcox for:".

Martin Bauer
Administrator
Air Quality Division

MB/CZ/sd

Permit No. P-030505

Enclosures

cc: Rensay Owen, Idaho Falls Regional Office
Sherry Davis, Air Quality Division
Laurie Kral, EPA Region 10
Mike Simon, Permit Coordinator
Carole Zundel, Permit Writer
Marilyn Seymore, Permit Binder
Pat Rayne, AFS
Source File
Phyllis Heitman, (Ltr Only)
Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: P-030505

FACILITY ID NO.: 023-00001

AQCR: 61 **CLASS:** A

SIC: 9999 **ZONE:** 12

UTM COORDINATE (km): 342.5 , 4827.2

1. PERMITTEE

Department of Energy / Idaho National Engineering and Environmental Laboratory / Idaho Nuclear Technology and Engineering Center

2. PROJECT

Building CPP-606 distillate oil-fired boilers

3. MAILING ADDRESS

1955 Fremont Avenue

CITY

Idaho Falls

STATE

ID

ZIP

83401

4. FACILITY CONTACT

Scott L. Lyman

TITLE

Project Environmental Lead

TELEPHONE

(208) 526-1095

5. RESPONSIBLE OFFICIAL

Elizabeth D. Sellers

TITLE

NE-ID Manager

TELEPHONE

(208) 526-5665

6. EXACT PLANT LOCATION

INTEC Facility, Building CPP-606; E 343812, N 4826008

COUNTY

Butte

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Nuclear and Environmental Research and Development

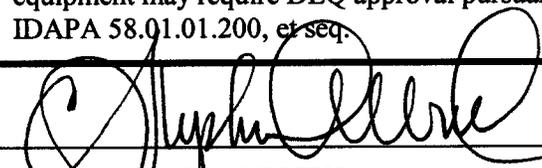
8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.


C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: January 21, 2004

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
DOE	Department of Energy
EPA	U.S. Environmental Protection Agency
gal/day	gallons per day
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic foot
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
INEEL	Idaho National Engineering and Environmental Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
km	kilometer
lb	pound
lb/day	pound per day
lb/hr	pound per hour
m	meter(s)
MMBtu/hr	million British thermal units per hour
NO _x	nitrogen oxides
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This PTC replaces PTC No. 023-00001, issued June 26, 2000. The permit is modified to remove the INTEC distillate oil-fired portable boiler, which has been removed from service, and to reduce the throughput limits for the remaining boilers based on the results of the performance tests. Because of these changes, the permitted emission limits are also being changed.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 REGULATED EMISSIONS SOURCES

Source ID	Description	Emissions
2.0	Four 36.4 MMBtu/hr boilers, distillate fuel oil, located in Building CPP-606	None

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
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2. CPP-606 BOILERS

2.1 Process Description

The primary purpose of the four boilers at CPP-606 is to provide steam for heating and process use for the INTEC facility.

2.2 Emissions Control Description

Emissions from the CPP-606 boilers are uncontrolled.

Emissions Limits

2.3 Emissions Limits

The SO₂, NO_x, and beryllium emissions from the CPP-606 boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 2.1.

Table 2.1 CPP-606 BOILER EMISSIONS LIMITS*

Source Description	SO ₂		NO _x		Beryllium	
	lb/day	T/yr	lb/day	T/yr	lb/day	T/yr
CPP-606 boilers	895	163	415	75.6	1.05E-02	1.91E-03

*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

2.4 Fuel Burning Equipment - Particulate Matter Emission Standard

In accordance with IDAPA 58.01.01.676 (Rules for the Control of Air Pollution in Idaho), the permittee shall not discharge into the atmosphere from the Building CPP-606 boilers stacks any gases that contain particulate matter emissions in excess of 0.050 grains per dry standard cubic foot (gr/dscf) corrected to 3% oxygen.

2.5 Opacity Limit

The permittee shall not discharge into the atmosphere from the Building CPP-606 boilers stacks or any other stack, vent, or functionally equivalent opening, emissions that exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period, as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.6 40 CFR 60.43c Opacity Limit

In accordance with 40 CFR 60.43c, the permittee shall not discharge into the atmosphere from the Building CPP-606 boilers stacks any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity. The opacity standard shall apply at all times except during periods of startup, shutdown, or malfunction. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625 and as specified in 40 CFR Part 60.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

Operating Requirements

2.7 Boiler Fuel

The permittee shall combust distillate oil exclusively in the Building CPP-606 boilers. The distillate oil combusted in these boilers shall not contain greater than 0.3 weight percent sulfur.

2.8 40 CFR 60.42c(d) Boiler Fuel Requirement

In accordance with 40 CFR 60.42c(d), the permittee shall not combust distillate oil that contains greater than 0.5 weight percent sulfur in the Building CPP-606 boilers. In accordance with 40 CFR 60.41c, distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils".

2.9 Boiler Fuel Throughput Limit

The total amount of boiler fuel combusted for all Building CPP-606 boilers shall not exceed 20,736 gallons per day.

Monitoring and Recordkeeping Requirements

2.10 Boiler Fuel Sulfur Content

To demonstrate compliance with Sections 2.7 and 2.8 of this permit, the fuel oil supplier shall certify all boiler fuel combusted in the Building CPP-606 boilers. In accordance with 40 CFR 60.48c(f), fuel oil supplier certification shall include the name of the fuel oil supplier, and a statement from the fuel oil supplier that the fuel oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.

2.11 Boiler Fuel Throughput

In accordance with 40 CFR 60.48.c(g), the permittee shall monitor and record the amount of boiler fuel combusted in the Building CPP-606 boilers. The amount of boiler fuel combusted shall be recorded as gallons per day (gal/day), in a log, kept at the facility for the most recent two-year period. The log shall be available to DEQ representatives upon request.

2.12 Sulfur Dioxide Performance Test

In accordance with 40 CFR 60.44c(h), the performance test to demonstrate compliance with Section 2.8 of this permit shall consist of certification from the fuel supplier. In accordance with 40 CFR 60.48c(f), fuel supplier certification shall include the following information for distillate oil: (1) the name of the oil supplier; and (2) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41.c.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

REPORTING REQUIREMENTS

2.13 Performance Test Report

In accordance with IDAPA 58.01.01.157.04, the permittee shall submit a written report of the performance test results to DEQ within 30 days of completion of the test.

2.14 Semi-Annual Reporting

In accordance with 40 CFR 60.48c(d), the permittee shall submit semi-annual reports to EPA Region X and to DEQ. In accordance with 40 CFR 60.48c(j), the reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to EPA Region X and to DEQ and shall be postmarked by the 30th day following the end of the reporting period. Each submitted semi-annual report shall contain the information required by 40 CFR 60.48c(e), as applicable.

2.15 Recordkeeping

In accordance with 40 CFR 60.48c(i), the permittee shall maintain all records of the information required by 40 CFR 60.48c(e). The permittee shall maintain the records for a period of two years following the date of such record.

2.16 Certification of Documents

All documents, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

3. SUMMARY OF EMISSIONS LIMITS

Table 3.1 provides a summary of all emissions limits required by this permit:

Table 3.1 SUMMARY OF EMISSIONS LIMITS

CPP-606 boilers	895	163	415	75.6	1.05E-02	1.91E-03

- ^a As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.
- ^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates. The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

4. EMISSIONS INVENTORY

The following table is a summary of the emissions increases and decreases associated with this permit modification. The emissions inventory table is provided for informational purposes only.

Table 4.1 EMISSIONS INVENTORY

Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Decrease (T/yr)	Change in Emissions (T/yr)
NO _x	0	23	(23)
SO ₂	0	50	(50)
CO	0	5.45	(5.45)
PM ₁₀	0	2.3	(2.3)
VOC	0	0.36	(0.36)
TAPS/ HAPS	0	0.0412	(0.0412)
Total:	0	81.15	(81.15)

*TAPS/HAPS = toxic air pollutants / hazardous air pollutants

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030505

Permittee: Department of Energy	Facility ID No. 023-00001	Date Issued: January 21, 2004
Location: Idaho Falls, Idaho		

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

8. In accordance with IDAPA 58.01.01.123, all documents submitted to the department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.



Air Quality Permitting Statement of Basis

Permit to Construct No. P-030505

Department of Energy, INTEC, INEEL

Facility ID No. 023-00001

Prepared by:

*Carole Zundel, Permit Writer
Air Quality Division*

November 21, 2003

Final Permit

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, for issuing permits to construct.

2. PROJECT DESCRIPTION

Department of Energy, INEEL - INTEC is proposing to modify PTC No. 023-00001 issued on June 26, 2000 to remove the distillate oil-fired portable boiler from the permit and modify the daily fuel throughput limit for the CPP-606 distillate oil-fired boilers.

This permit supercedes PTC No. 023-00001 issued June 26, 2000. The technical memorandum written for the June 26, 2000 PTC No. 023-00001 contains information applicable to this modified PTC, No. P-030505, which incorporates most of the permit conditions as written in the 6/26/00 PTC.

The portable boiler has been removed from service.

A boiler particulate matter performance test was conducted by the INEEL in March 2001 and was approved by DEQ in a letter dated August 24, 2001 which also modified the maximum allowable operating rate (daily fuel consumption).

The permitted throughput has been changed to limit only the remaining boilers, and emission limits are modified to reflect the reduced throughput and the removal of the portable boiler.

Emission Estimates

From the August 24, 2001 Compliance Evaluation letter from DEQ to INEEL, the boiler tested was operated at 3.0 gallons per minute during the test. To establish daily estimates, the daily tested rate is calculated to be 4320 gallons per hour (not the rated capacity). This limit is increased by 120% per General Provision F in PTC No. 023-00001 issued 6/26/00 and as written in the 8/24/01 letter from DEQ to INEEL.

Example calculations:

$$PM_{10} = 4320 \text{ gal/day} \times 120\% \times 2 \text{ lb } PM_{10}/1,000 \text{ gal} \times 4 \text{ boilers} = 41.5 \text{ lb } PM_{10}/\text{day}$$

Because the HAP/TAP calculations were based on a Btu rating and that has not changed, those emission estimates were changed by calculating emissions for the four remaining boilers and no longer including the emissions from the portable boiler.

$$Pb = 36.4 \text{ MMBtu/hr} \times 9 \text{ lb } Pb/1E12 \text{ Btu} \times 4 \text{ boilers} \times 24 \text{ hrs} = 0.0314 \text{ lb } Pb/\text{day}$$

Table 2.1 EMISSION ESTIMATES

Pollutant	lb/day	T/yr	Pollutant	lb/day	T/yr
PM ₁₀	4.15E+01	7.56E+00	Se	5.25E-02	9.57E-03
SO _x	8.95E+02	1.63E+02	Zn	1.40E-02	2.55E-03
NO _x	4.15E+02	7.56E+01	Benzene	4.84E-03	8.82E-04
CO	1.03E+02	1.92E+01	Ethylbenzene	1.43E-03	2.61E-04
VOC	6.96E+00	1.32E+00	Toluene	1.40E-01	2.55E-02
As	1.40E-02	2.55E-03	Xylene	1.99E-03	3.64E-04
Cd	1.05E-02	1.91E-03	Formaldehyde	7.44E-01	1.36E-01
Cr	1.05E-02	1.91E-03	Naphthalene	2.54E-02	4.64E-03
Mn	2.10E-02	3.83E-03	Hg	1.05E-02	1.91E-03
Ni	1.05E-02	1.91E-03	Be	1.05E-02	1.91E-03
Cu	2.10E-02	3.83E-03	Pb	3.14E-02	5.74E-03

No modeling is required because this permit is for an emissions reduction for the boilers, and the boilers' emissions were modeled at a higher rate in the permitting process for the previous permit (PTC 023-00001, 6/26/00) for these boilers.

Only the permit conditions which have been modified from the previous permit (PTC No. 023-00001, 6/26/00) are addressed here. Refer to the May 15, 2000 technical memorandum from Bill Rogers to Jim Johnston for a discussion of the permit conditions incorporated from the 6/26/00 PTC.

All references to the INTEC portable boiler have been removed.

Because the boilers have been constructed and operated, the permit condition requiring notification of construction and start-up was removed.

The opacity performance test requirement was removed because the required test was completed in December 2000 and results were transmitted to DEQ in a letter dated January 11, 2001.

The boiler particulate matter test requirement was removed because the required test was completed in March 2001 and the results were transmitted to DEQ in a letter dated April 26, 2001.

The emission testing protocol requirement was removed because no other emission testing is required in the permit.

2.1 SO₂, NO_x, and Beryllium Emissions Limits

The SO₂, NO_x, and beryllium emissions from the CPP-606 boiler stacks had significant net emissions increases for the original 6/26/00 PSD PTC analysis. The limits have been reduced as documented in the *Emissions Estimates* section of this technical memorandum.

2.2 Compliance Demonstration

The fuel throughput is limited, and tracking required daily, such that the calculated emissions will not exceed the daily limit. If the daily limit is not exceeded, then the annual limit will not be exceeded as the annual limit was calculated using the daily limit times 365 days. If a daily limit is exceeded, then annual compliance would be determined using a compilation of the daily fuel times the emission factor for each pollutant. The sulfur content of the fuel is limited and the permit contains a requirement to obtain the fuel supplier's sulfur content certification for the fuel.

2.3 Permit Condition 2.9 Boiler Fuel Throughput

The total fuel throughput for the four boilers combined was changed to 120% of the tested rate times four boilers (all boilers are the same size), as follows:

120% x 4320 gallons per day x 4 boilers = 20,736 gallons per day

2.4 Compliance Demonstration

The fuel throughput is required to be tracked daily.

3. PROJECT SUMMARY OF EVENTS

- 6/26/00 PSD PTC No. 023-00001 issued for CPP-606 distillate oil-fired boilers and the INTEC distillate oil-fired portable boiler.
- 1/11/01 Letter from INEEL to the DEQ transmitting a "Performance Report for December 13-18, 2000 Opacity Performance Test for the INTEC CPP-606 Boilers."
- 3/13/01 Compliance test conducted for the Building CPP-606 distillate oil-fired boiler.
- 4/26/01 Letter from INEEL to the DEQ transmitting a "INTEC CPP-606 Sampling Final Report."
- 8/24/01 Letter from DEQ to INEEL accepting the tests and modifying the fuel throughput for the boilers.
- 2/27/03 DEQ received application for permit modification.
- 4/8/03 Application declared complete.
- 4/25/03 DEQ received a letter requesting a facility draft review period from INTEC.
- 8/27/03 Facility draft permit issued.
- 11/12/03 Comments received from facility.
- 11/20/03 Permit processing fee received.

4. FEES

INEEL paid the \$1,000 application fee as required in IDAPA 58.01.01.224 on March 3, 2003. INEEL paid the \$250 permit processing fee on November 20, 2003. The INEEL facility is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

5. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that INEEL be issued modified PTC No. P-030505 for the CPP-606 boilers. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

CZ/sd Permit No. P-030505

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