

AIR PERMITTING APPLICABILITY DETERMINATION

Note: This completed form serves as official transmittal and documentation of the Environmental Affairs (EA) Air Permitting Applicability Determination (APAD) and is approved based on the information and project description supplied by a Project Manager or Designee. This form is the official means of documenting APAD review, and specifies project specific permitting actions required and/or operating conditions for the emission of air pollutants, or 40 CFR 68 requirements for storage of regulated chemicals. Unless operation or construction is initiated within one year (or as otherwise noted in the APAD), the APAD is valid for one year from the Issuance Date. If project operation or construction is not initiated within one year of the Issuance Date, or the Project Manager or Designee fails to provide project status or a revision request to EA, the APAD will be rescinded. Project status is made using INEEL Form 450.31.

The calculations used herein are performed in accordance with approved environmental protocols, and therefore may not suffice for use in health, safety, or radiological control evaluations.

Section A. Document Concurrence

Instructions: The APAD Document Preparer shall sign the appropriate block and obtain the signature of the APAD Technical Reviewer and the Project Manager. Additional signatures may be obtained at the request of cognizant EA, facility, or project personnel.

Project Title: WMF-610, SWEPP, Two 400,000-Btu/h Propane Space Heaters and a 75-kw Propane Generator

APAD Issuance Date: _____ NEPA Document or Project Number: N/A

APAD Tracking Number: 05-09

APAD Document Preparer:

I have prepared this document in accordance with applicable requirements and regulatory agency guidance, and I verify it is true, accurate, and complete to the best of my knowledge.

Harrison Orr
Print/Type Name Signature Date

APAD Technical Reviewer (Must complete APAD Appendix B Checklist):

I have reviewed this document for technical accuracy and content, including the validation of calculations where applicable, and concur that it is true, accurate, and complete to the best of my knowledge.

Curtis Reece
Print/Type Name Signature Date

Project Manager (Must complete APAD Appendix C Checklist):

I concur that based on my inquiry of the person(s) who prepared this document, and/or the person(s) directly responsible for gathering or providing the information, the document is true, accurate, and complete to the best of my knowledge.

Print/Type Name Signature Date

Title:

I concur that based on my inquiry of the person(s) who prepared this document, and/or the person(s) directly responsible for gathering or providing the information, the document is true, accurate, and complete to the best of my knowledge.

Print/Type Name Signature Date

Title:

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Print/Type Name

Signature

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Title: _____

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	Print/Type Name		Signature	Date
Section B. Common APAD Acronyms				
AEI	Air Emissions Inventory	APAD	Air Permitting Applicability Determination	
ARAR	Applicable or Relevant and Appropriate Requirements	BRC	Below Regulatory Concern	
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act	RS	Regulatory Services	
EC	Environmental Checklist	EPA	United States Environmental Protection Agency	
IDAPA	Idaho Administrative Procedures Act	IDEQ	Idaho Department of Environmental Quality	
NEPA	National Environmental Policy Act	NESHAP	National Emissions Standard for Hazardous Air Pollutants	
PSD	Prevention of Significant Deterioration	PTC	Permit To Construct	
RMP	Risk Management Plan	TAP	Toxic Air Pollutant	
WAG	Waste ArRegulatory ServicesGroup			

Section C. Air Permitting Applicability Determination

Instructions: Indicate determination by checking the appropriate box. The appropriate "No Permitting Required" box must be checked for any "Category I" or "Category II Exemption." A Below Regulatory Concern (BRC), Level 1, 2, or 3 determination must also be checked for any Category I or II Exemption for which Toxic Air Pollutants (TAPs) are documented.

- | | |
|---|--|
| <input type="checkbox"/> Permit to Construct (PTC) Required from Regulatory Agency
<input type="checkbox"/> Category I Exemption:
TAPs : <input type="checkbox"/> BRC; <input type="checkbox"/> Level 1; <input type="checkbox"/> Level 2; <input type="checkbox"/> Level 3

<input type="checkbox"/> Risk Management Plan Required
<input type="checkbox"/> Further Evaluation for Permitting Required
<input type="checkbox"/> No Permitting Required, With Conditions (See Sections E, F, & G)
<input type="checkbox"/> No Permitting Required, CERCLA Action with Conditions (Must Meet ARARs, See Sections E, F, & G) | <input type="checkbox"/> PTC Modification Required from Regulatory Agency
<input checked="" type="checkbox"/> Category II Exemption:
TAPs : <input type="checkbox"/> BRC; <input type="checkbox"/> Level 1; <input type="checkbox"/> Level 2; <input type="checkbox"/> Level 3
<input type="checkbox"/> NESHAP Approval to Construct Required
<input checked="" type="checkbox"/> No Permitting Required, Without Conditions |
|---|--|

Section D. Brief Description of Air Pollutant Emitting Aspects of Proposed Activity

Instructions: Include in this section a brief description that summarizes the scope of the project, the facility affected, whether the facility currently has emissions, and a summary of emission impacts caused by the proposed project. Information such as a paraphrased summary of the project description in an Environmental Checklist (EC), location, vents, and horsepower ratings for engines, should be included. Documents (including relevant letters, relevant e-mails, written records of personal communications, etc.) upon which this description is based must be included in the APAD information file. Date and identify the source of information for all material placed in this APAD and the APAD information file.

Operation of two 400,000 Btu/h propane space heaters and a 75-kw propane generator

Section E. Impacts and Summary of Applicable Regulations

Instructions: Based upon review of applicable project information, regulations, agency guidance, and REGULATORY SERVICESregulatory clarification documents, check all boxes for which the project may incur regulatory impact or requirement.

- | | |
|--|---|
| <input type="checkbox"/> Change in Stack Parameters
<input type="checkbox"/> Excess Emissions Reporting | <input type="checkbox"/> CERCLA Remedial Action
<input type="checkbox"/> Demolition Notification |
|--|---|

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- | | |
|---|--|
| <input type="checkbox"/> Fuel Sulfur Content | <input type="checkbox"/> Fuel Burning Equipment Particulate Matter |
| <input type="checkbox"/> Fugitive Dust Control | <input type="checkbox"/> NESHAP Asbestos Notification |
| <input type="checkbox"/> Air Emissions Inventory | <input type="checkbox"/> NESHAP Continuously Monitored Radionuclide |
| <input type="checkbox"/> NESHAP Radionuclide Actual Emissions | <input type="checkbox"/> Title V Operating Permit |
| <input type="checkbox"/> NESHAP Unabated Radionuclide Emissions | <input type="checkbox"/> Notification of Emissions Change |
| <input type="checkbox"/> Open Burning | <input type="checkbox"/> Particulate Matter Process Weight Limitations |
| <input type="checkbox"/> Portable Equipment Registration | <input type="checkbox"/> Subcontractor Internal Combustion Engine(s) |
| <input type="checkbox"/> Subcontractor Permitting/Registration | <input type="checkbox"/> Visible Emissions |
| <input type="checkbox"/> Risk Management Plan | <input checked="" type="checkbox"/> None |

Section F. Summary of Requirements of Operations

Instructions: For each impact checked in Section E, cite the regulation and summarize the applicable requirements.

None

Section G. Facility/Project Tasks for Demonstration of Compliance to Requirements

Instructions: For each requirement presented in Section F, specify in Part II below detailed actions that Facility/Project personnel must take to adequately demonstrate compliance. This includes identifying required reports/notifications (including due dates), documenting the manner in which throughput limitations are to be met, identifying required monitoring methods and frequency, specifying record keeping frequency, and providing details on any specific tasks necessary to document actual or potential emissions. State "No Compliance Tasks" for any requirement in Section F for which Facility/Project personnel have no responsibilities.

Part I: Facility/Project task responsibilities applicable to all projects:

- A The Facility Manager or Designee shall ensure this APAD is maintained with its associated information file at an on-site location (See Appendix C for facility identified storage location)
- B The Facility Manager or Designee, using the INEEL Form 450.31, shall provide to Regulatory Services, an annual notification of project status, and one-time notification within 30 days after any of the following:
 - 1. Construction - NA
 - 2. Startup - NA
 - 3. Completion - NA
 - 4. Cancellation
- C The Project Manager or Designee shall provide advance written notification to Regulatory Services as soon as possible if the project scope changes. Notification to Regulatory Services is necessary to ensure the APAD is accurate and complete for a proposed scope change.

Part II: Facility/Project task responsibilities specific to this project:

None

Section H. Summary of Applicable Environmental Reports Performed by Environmental Affairs

Instructions: Based on the presence of regulated air pollutants documented in this APAD and the applicability of regulatory requirements, check the appropriate boxes below to indicate those reports and documents prepared by REGULATORY SERVICES that are impacted by this APAD.

- | | |
|--|--|
| <input type="checkbox"/> Air Emissions Inventory | <input type="checkbox"/> Title V Air Operating Permit |
| <input type="checkbox"/> Annual Toxics Report | <input type="checkbox"/> NESHAP Continuous Compliance Monitoring |
| <input type="checkbox"/> NESHAP Annual Report | <input type="checkbox"/> NESHAP Periodic Confirmatory Monitoring |

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- | | |
|---|---|
| <input type="checkbox"/> PSD Quarterly Report | <input type="checkbox"/> Risk Management Plan |
| <input type="checkbox"/> Semi-Annual Continuous Compliance Report | <input checked="" type="checkbox"/> None |

Section I: Justification for APAD

Instructions: Cite the regulation upon which the determination is based, and document how the project meets each condition of the regulation. Background documentation, including emission calculations and modeling, which substantiates the determination, must be included in Appendix A.

STATE REGULATIONS

IDAPA 58.01.01.220 GENERAL EXEMPTION CRITERIA FOR PERMIT TO CONSTRUCT EXEMPTIONS

01. General Exemption Criteria. Sections 220 through 223 may be used by owners or operators to exempt certain sources from the requirement to obtain a permit to construct. Nothing in these sections shall preclude an owner or operator from choosing to obtain a permit to construct. For purposes of Sections 220 through 223, the term source means the equipment or activity being exempted. No permit to construct is required for a source that satisfies all of the following criteria, in addition to the criteria set forth at Sections 221, 222, or 223: (4-5-00)

a. The maximum capacity of a source to emit an air pollutant under its physical and operational design without consideration of limitations on emission such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed would not: (4-5-00)

i. Equal or exceed one hundred (100) tons per year of any regulated air pollutant. (4-5-00)

Justification: Based on the nature of the activity, emissions will be below 100 tons per year.

ii. Cause an increase in the emissions of a major facility that equals or exceeds the significant emissions rates set out in the definition of significant at Section 006. (4-5-00)

Justification: Through process knowledge, emissions will be below 100 tons per year.

iii. Cause or significantly contribute to a violation of an ambient air quality standard, based upon the applicable air quality models, data bases, and other requirements of 40 CFR Part 51, Appendix W (Guideline on Air Quality Models). No demonstration under this subsection is required for those sources listed at Subsection 222.02. (4-5-00)

Justification: Through process knowledge and engineering controls, emissions will be below any ambient standard.

b. Combination. The source is not part of a proposed new major facility or part of a proposed major modification. (4-5-00)

Justification: This equipment operation is not part of a proposed new major facility or part of a proposed major modification.

02. Record Retention. Unless the source is subject to and the owner or operator complies with Section 385, the owner or operator of the source, except for those sources listed in Subsections 222.02.a. through 222.02.g., shall maintain documentation on site which shall identify the exemption determined to apply to the source and verify that the source qualifies for the identified exemption. The records and documentation shall be kept for a period of time not less than five (5) years from the date the exemption determination has been made or for the life of the source for which the exemption has been determined to apply, which ever is greater, or until such time as a permit to construct or an operating permit is issued which covers the operation of the source. The owner or operator shall submit the documentation to the Department upon request. (4-5-00)

Justification: Facility personnel will maintain a copy of this exemption determination in accordance with the requirements.

222. CATEGORY II EXEMPTION.

No permit to construct is required for the following sources. (4-5-00)

01. Exempt Source. A source that satisfies the criteria set forth in Section 220 and that is specified below:

c. Stationary internal combustion engines of less than or equal to six hundred (600) horsepower and which are fueled by natural gas, propane gas, liquefied petroleum gas, distillate fuel oils, residual fuel oils, and diesel fuel; waste oil, gasoline, or refined gasoline shall not be used. To qualify for this exemption, the source must be operated in accordance with the following: (5-1-94)

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- i. One hundred (100) horsepower or less -- unlimited hours of operation.

The 75 kw propane generator converts to 100 hp (<http://www.onlineconversion.com/>)

02. Other Exempt Sources. A source that satisfies the criteria set forth in Section 220 and that is specified below: (4-5-00)

c. Fuel burning equipment for indirect heating and for heating and reheating furnaces using natural gas, propane gas, liquified petroleum gas exclusively with a capacity of less than fifty (50) million btu's per hour input.

The exempted propane space heaters are rated at 400,000 million btu's per hour input and therefore less than the fifty (50) million btu's per hour input threshold.

Section J: Toxic Air Pollutant Emission Information

Instructions: Upon identifying the presence of applicable toxic air pollutants for the project, the APAD Document Preparer shall identify the specific pollutants and document their emission rates. Refer to IDAPA 58.01.01.585 and 586 to complete this section. If no TAPs are expected to be present, state "None" or "N/A"

None

Appendix A. APAD Technical Reviewer Quality Checklist

Instructions: This checklist is provided to assist in the Quality Review of the APAD form. For each question enter the review date in the applicable box.

Quality Review Questions	Yes	No	N/A	Date
1. Have sections C through J been completed?				
2. Does Section D provide an adequate description of the project, and is it substantiated by the information in the draft or final EC, Appendix A, and/or the project information file?				
3. Have the applicable boxes in Section E been marked appropriately based on the scope of the project presented in the draft or final EC, Appendix A, and/or the project information file?			X	
3a. Have applicable requirements been listed for impacts checked in Section E?			X	
4. Has a detailed task/responsibility been prescribed for Facility/Project personnel in Section G for each requirement presented in Section F?			X	
4a. Does each task provide sufficient detail to direct facility/project personnel in maintaining, demonstrating, and documenting compliance?			X	
5. Have all the applicable boxes for reports been checked in Section H based on the presence/absence of potential air pollutant emissions or 40 CFR 68 regulated chemicals identified in Section D, Appendix A, the draft or final EC, and/or the project information file?			X	
5a. Has the Annual Toxics Report been accurately marked if toxic air pollutants are present?			X	
5b. Has the NESHAPs Annual Report been accurately marked if radiological emissions are present?			X	
5c. Has the AEI been accurately marked if this is a new source, an existing source, or an inactivation of an existing source?			X	
6. Is the justification in Section I accurate and consistent with Regulatory Services, and substantiated by the information in the APAD Appendix A?	X			
6a. If the APAD indicates this is a pre-existing source where no increase in emissions are expected or no construction or modification impacting existing source parameters are expected, has it been adequately documented?			X	
7. Has Section J identified applicable Toxic Air Pollutants likely to be emitted based on the scope of work described by Section D?			X	
8. Has sufficient information been provided by the facility/project and included in Appendix A and/or the project information file to make an accurate permitting determination?			X	
8a. Are the emission calculations accurate, reasonable, and defensible?			X	
8b. Have all equations been clearly shown including all variables and sources of variables, and have adequate assumptions been provided?			X	
8c. Have appropriate modeling results been included or referenced?			X	

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8d. If modeled as a ground release, has emission source applicability for ground release modeling been verified?			X	
8e. If applicable, has a quality statement been signed and submitted by the modeler confirming that modeling was performed in accordance with the INEEL Air Modeling Protocol INEEL/INT-98-00236?			X	
9. If questions 1 through 8 have been marked "Yes" or "N/A" has a consistency check been completed by the Regulatory Services Manager or Designee?			X	

Reviewer Comments:

Instructions: Insert reviewer comments if necessary.

Independent Technical Review Performed By:

Curtis Reece		
Print/Type Name	Signature	Date

Appendix B. Project/Facility Manager Requirements Quality Checklists

Instructions: These checklists are provided to assist in the quality review of the APAD requirements. For each numbered question enter the review date in the applicable box. The Project Manager and Facility Manager are required to complete their respective checklists prior to issuance of a complete APAD.

Project Manager

Requirements and Quality Review Questions	Yes	No	N/A	Date
1. Is the information in this APAD accurate and complete to the best of your knowledge?				
2. Does the information in Section D and the APAD Information File provide an accurate description of the project and its anticipated scope?				
3. Can the project satisfy all the requirements specified in Section G, and provide all the specified information?				
4. Do you acknowledge the requirement to provide notice of project status within the time period specified in the APAD in order to prevent cancellation of the APAD authorization?				
5. Do you acknowledge the need to request an APAD revision from Regulatory Services should the project scope, potential emissions, and/or actual emissions change from what was previously presented in Section D, Appendix A, and/or the APAD Information File?				

Who is responsible for providing notice to Regulatory Services for the annual project status update and the one-time project construction, operation, completion, and cancellation notices?

Harrison Orr

Who is responsible for providing written notice to Regulatory Services of any changes to the scope of the project as currently documented in Section D and the APAD information file?

Harrison Orr

In which on-site record storage facility will a copy of this APAD be maintained?

CF-615

Who is the current records coordinator for the on-site record storage facility?

Paulette Adams-Watson

Project Manager:

Signature indicates that the reviewer has completed the checklist, verifies that the information is true, accurate, and complete, and accepts responsibility for ensuring that the final signed copy is sent to the designated records storage facility.

Keith Farmer		
Print/Type Name	Signature	Date

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The calculations used herein are performed in accordance with approved environmental protocols, and therefore may not suffice for use in health, safety, or radiological control evaluations.

Section A. Document Concurrence

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APAD Issuance Date: _____ NEPA Document or Project Number: N/A

APAD Tracking _____

Number: 05-09

APAD Document Preparer:

I have prepared this document in accordance with applicable requirements and regulatory agency guidance, and I verify it is true, accurate, and complete to the best of my knowledge.

Tim Solle
Print/Type Name Signature Date

APAD Technical Reviewer (Must complete APAD Appendix B Checklist):

I have reviewed this document for technical accuracy and content, including the validation of calculations where applicable, and concur that it is true, accurate, and complete to the best of my knowledge.

Print/Type Name Signature Date

Project Manager (Must complete APAD Appendix C Checklist):

I concur that based on my inquiry of the person(s) who prepared this document, and/or the person(s) directly responsible for gathering or providing the information, the document is true, accurate, and complete to the best of my knowledge.

Print/Type Name Signature Date

Title: _____

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PSD	Prevention of Significant Deterioration	PTC	Permit To Construct	
RMP	Risk Management Plan	TAP	Toxic Air Pollutant	
WAG	Waste Area Group			

Section C. Air Permitting Applicability Determination

Instructions: Indicate determination by checking the appropriate box. The appropriate "No Permitting Required" box must be checked for any "Category I" or "Category II Exemption." A Below Regulatory Concern (BRC), Level 1, 2, or 3 determination must also be checked for any Category I or II Exemption for which Toxic Air Pollutants (TAPs) are documented.

- | | |
|---|--|
| <input type="checkbox"/> Permit to Construct (PTC) Required from Regulatory Agency
<input type="checkbox"/> Category I Exemption:
TAPs : <input type="checkbox"/> BRC; <input type="checkbox"/> Level 1; <input type="checkbox"/> Level 2; <input type="checkbox"/> Level 3

<input type="checkbox"/> Risk Management Plan Required
<input type="checkbox"/> Further Evaluation for Permitting Required
<input type="checkbox"/> No Permitting Required, With Conditions (See Sections E, F, & G)
<input type="checkbox"/> No Permitting Required, CERCLA Action with Conditions (Must Meet ARARs, See Sections E, F, & G) (The SWEPP facility is not a CERCLA Action. | <input type="checkbox"/> PTC Modification Required from Regulatory Agency
<input checked="" type="checkbox"/> Category II Exemption:
TAPs : <input type="checkbox"/> BRC; <input type="checkbox"/> Level 1; <input type="checkbox"/> Level 2; <input type="checkbox"/> Level 3

<input type="checkbox"/> NESHAP Approval to Construct Required
<input checked="" type="checkbox"/> No Permitting Required, Without Conditions |
|---|--|

Section D. Brief Description of Air Pollutant Emitting Aspects of Proposed Activity

Instructions: Include in this section a brief description that summarizes the scope of the project, the facility affected, whether the facility currently has emissions, and a summary of emission impacts caused by the proposed project. Information such as a paraphrased summary of the project description in an Environmental Checklist (EC), location, vents, and horsepower ratings for engines, should be included. Documents (including relevant letters, relevant e-mails, written records of personal communications, etc.) upon which this description is based must be included in the APAD information file. Date and identify the source of information for all material placed in this APAD and the APAD information file.

Operation of two 400,000 Btu/h propane space heaters and a 75-kw propane generator.

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- | | |
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| <input type="checkbox"/> Change in Stack Parameters
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| <input type="checkbox"/> Portable Equipment Registration | <input type="checkbox"/> Subcontractor Internal Combustion Engine(s) |
| <input type="checkbox"/> Subcontractor Permitting/Registration | <input type="checkbox"/> Visible Emissions |
| <input type="checkbox"/> Risk Management Plan | <input checked="" type="checkbox"/> None |

Section F. Summary of Requirements of Operations

Instructions: For each impact checked in Section E, cite the regulation and summarize the applicable requirements.

None

Section G. Facility/Project Tasks for Demonstration of Compliance to Requirements

Instructions: For each requirement presented in Section F, specify in Part II below detailed actions that Facility/Project personnel must take to adequately demonstrate compliance. This includes identifying required reports/notifications (including due dates), documenting the manner in which throughput limitations are to be met, identifying required monitoring methods and frequency, specifying record keeping frequency, and providing details on any specific tasks necessary to document actual or potential emissions. State "No Compliance Tasks" for any requirement in Section F for which Facility/Project personnel have no responsibilities.

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 - 2. Startup - NA
 - 3. Completion - NA
 - 4. Cancellation
- C The Project Manager or Designee shall provide advance written notification to Regulatory Services as soon as possible if the project scope changes. Notification to Regulatory Services is necessary to ensure the APAD is accurate and complete for a proposed scope change.

Part II: Facility/Project task responsibilities specific to this project:

None

Section H. Summary of Applicable Environmental Reports Performed by Environmental Affairs

Instructions: Based on the presence of regulated air pollutants documented in this APAD and the applicability of regulatory requirements, check the appropriate boxes below to indicate those reports and documents prepared by REGULATORY SERVICES that are impacted by this APAD.

- | | |
|--|--|
| <input type="checkbox"/> Air Emissions Inventory | <input type="checkbox"/> Title V Air Operating Permit |
| <input type="checkbox"/> Annual Toxics Report | <input type="checkbox"/> NESHAP Continuous Compliance Monitoring |
| <input type="checkbox"/> NESHAP Annual Report | <input type="checkbox"/> NESHAP Periodic Confirmatory Monitoring |

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- | | |
|---|---|
| <input type="checkbox"/> PSD Quarterly Report | <input type="checkbox"/> Risk Management Plan |
| <input type="checkbox"/> Semi-Annual Continuous Compliance Report | <input checked="" type="checkbox"/> None |

Section I: Justification for APAD

Instructions: Cite the regulation upon which the determination is based, and document how the project meets each condition of the regulation. Background documentation, including emission calculations and modeling, which substantiates the determination, must be included in Appendix A.

STATE REGULATIONS

IDAPA 58.01.01.220 GENERAL EXEMPTION CRITERIA FOR PERMIT TO CONSTRUCT EXEMPTIONS

01. General Exemption Criteria. Sections 220 through 223 may be used by owners or operators to exempt certain sources from the requirement to obtain a permit to construct. Nothing in these sections shall preclude an owner or operator from choosing to obtain a permit to construct. For purposes of Sections 220 through 223, the term source means the equipment or activity being exempted. No permit to construct is required for a source that satisfies all of the following criteria, in addition to the criteria set forth at Sections 221, 222, or 223: (4-5-00)

a. The maximum capacity of a source to emit an air pollutant under its physical and operational design without consideration of limitations on emission such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed would not: (4-5-00)

i. Equal or exceed one hundred (100) tons per year of any regulated air pollutant. (4-5-00)

Justification: Based on the nature of the activity, emissions will be below 100 tons per year.

ii. Cause an increase in the emissions of a major facility that equals or exceeds the significant emissions rates set out in the definition of significant at Section 006. (4-5-00)

Justification: Through process knowledge, emissions will be below 100 tons per year.

iii. Cause or significantly contribute to a violation of an ambient air quality standard, based upon the applicable air quality models, data bases, and other requirements of 40 CFR Part 51, Appendix W (Guideline on Air Quality Models). No demonstration under this subsection is required for those sources listed at Subsection 222.02. (4-5-00)

Justification: Through process knowledge and engineering controls, emissions will be below any ambient standard.

b. Combination. The source is not part of a proposed new major facility or part of a proposed major modification. (4-5-00)

Justification: This equipment operation is not part of a proposed new major facility or part of a proposed major modification.

02. Record Retention. Unless the source is subject to and the owner or operator complies with Section 385, the owner or operator of the source, except for those sources listed in Subsections 222.02.a. through 222.02.g., shall maintain documentation on site which shall identify the exemption determined to apply to the source and verify that the source qualifies for the identified exemption. The records and documentation shall be kept for a period of time not less than five (5) years from the date the exemption determination has been made or for the life of the source for which the exemption has been determined to apply, whichever is greater, or until such time as a permit to construct or an operating permit is issued which covers the operation of the source. The owner or operator shall submit the documentation to the Department upon request. (4-5-00)

Justification: Facility personnel will maintain a copy of this exemption determination in accordance with the requirements.

222. CATEGORY II EXEMPTION.

No permit to construct is required for the following sources. (4-5-00)

01. Exempt Source. A source that satisfies the criteria set forth in Section 220 and that is specified below:

c. Stationary internal combustion engines of less than or equal to six hundred (600) horsepower and which are fueled by natural gas, propane gas, liquefied petroleum gas, distillate fuel oils, residual fuel oils, and diesel fuel; waste oil, gasoline, or refined gasoline shall not be used. To qualify for this exemption, the source must be operated in accordance with the following: (5-1-94)

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- i. One hundred (100) horsepower or less -- unlimited hours of operation.

The 75 kw propane generator converts to 100 hp (<http://www.onlineconversion.com/>)

- 02. Other Exempt Sources.** A source that satisfies the criteria set forth in Section 220 and that is specified below: (4-5-00)

c. Fuel burning equipment for indirect heating and for heating and reheating furnaces using natural gas, propane gas, liquified petroleum gas exclusively with a capacity of less than fifty (50) million btu's per hour input.

The exempted propane space heaters are rated at 400,000 btu's per hour input and therefore less than the fifty (50) million btu's per hour input threshold.

Section J: Toxic Air Pollutant Emission Information

Instructions: Upon identifying the presence of applicable toxic air pollutants for the project, the APAD Document Preparer shall identify the specific pollutants and document their emission rates. Refer to IDAPA 58.01.01.585 and 586 to complete this section. If no TAPs are expected to be present, state "None" or "N/A"

None

Appendix A. APAD Technical Reviewer Quality Checklist

Instructions: This checklist is provided to assist in the Quality Review of the APAD form. For each question enter the review date in the applicable box.

Quality Review Questions	Yes	No	N/A	Date
1. Have sections C through J been completed?				
2. Does Section D provide an adequate description of the project, and is it substantiated by the information in the draft or final EC, Appendix A, and/or the project information file?				
3. Have the applicable boxes in Section E been marked appropriately based on the scope of the project presented in the draft or final EC, Appendix A, and/or the project information file?			X	
3a. Have applicable requirements been listed for impacts checked in Section E?			X	
4. Has a detailed task/responsibility been prescribed for Facility/Project personnel in Section G for each requirement presented in Section F?			X	
4a. Does each task provide sufficient detail to direct facility/project personnel in maintaining, demonstrating, and documenting compliance?			X	
5. Have all the applicable boxes for reports been checked in Section H based on the presence/absence of potential air pollutant emissions or 40 CFR 68 regulated chemicals identified in Section D, Appendix A, the draft or final EC, and/or the project information file?			X	
5a. Has the Annual Toxics Report been accurately marked if toxic air pollutants are present?			X	
5b. Has the NESHAPs Annual Report been accurately marked if radiological emissions are present?			X	
5c. Has the AEI been accurately marked if this is a new source, an existing source, or an inactivation of an existing source?			X	
6. Is the justification in Section I accurate and consistent with Regulatory Services, and substantiated by the information in the APAD Appendix A?	X			
6a. If the APAD indicates this is a pre-existing source where no increase in emissions are expected or no construction or modification impacting existing source parameters are expected, has it been adequately documented?			X	
7. Has Section J identified applicable Toxic Air Pollutants likely to be emitted based on the scope of work described by Section D?			X	
8. Has sufficient information been provided by the facility/project and included in Appendix A and/or the project information file to make an accurate permitting determination?			X	
8a. Are the emission calculations accurate, reasonable, and defensible?			X	
8b. Have all equations been clearly shown including all variables and sources of variables, and have adequate assumptions been provided?			X	
8c. Have appropriate modeling results been included or referenced?			X	

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8d. If modeled as a ground release, has emission source applicability for ground release modeling been verified?			X	
8e. If applicable, has a quality statement been signed and submitted by the modeler confirming that modeling was performed in accordance with the INEEL Air Modeling Protocol INEEL/INT-98-00236?			X	
9. If questions 1 through 8 have been marked "Yes" or "N/A" has a consistency check been completed by the Regulatory Services Manager or Designee?			X	

Reviewer Comments:

Instructions: Insert reviewer comments if necessary.

Independent Technical Review Performed By:

Print/Type Name	Signature	Date
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Appendix B. Project/Facility Manager Requirements Quality Checklists

Instructions: These checklists are provided to assist in the quality review of the APAD requirements. For each numbered question enter the review date in the applicable box. The Project Manager and Facility Manager are required to complete their respective checklists prior to issuance of a complete APAD.

Project Manager

Requirements and Quality Review Questions	Yes	No	N/A	Date
1. Is the information in this APAD accurate and complete to the best of your knowledge?				
2. Does the information in Section D and the APAD Information File provide an accurate description of the project and its anticipated scope?				
3. Can the project satisfy all the requirements specified in Section G, and provide all the specified information?				
4. Do you acknowledge the requirement to provide notice of project status within the time period specified in the APAD in order to prevent cancellation of the APAD authorization?				
5. Do you acknowledge the need to request an APAD revision from Regulatory Services should the project scope, potential emissions, and/or actual emissions change from what was previously presented in Section D, Appendix A, and/or the APAD Information File?				

Who is responsible for providing notice to Regulatory Services for the annual project status update and the one-time project construction, operation, completion, and cancellation notices?

Who is responsible for providing written notice to Regulatory Services of any changes to the scope of the project as currently documented in Section D and the APAD information file?

In which on-site record storage facility will a copy of this APAD be maintained?

Who is the current records coordinator for the on-site record storage facility?

Project Manager:

Signature indicates that the reviewer has completed the checklist, verifies that the information is true, accurate, and complete, and accepts responsibility for ensuring that the final signed copy is sent to the designated records storage facility.

Print/Type Name	Signature	Date
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