

EPA Review

Clean Air Act Section 112

40 CFR 61

National Emission Standard for Hazardous Air Pollutants

NESHAPs

Subpart H

Brookhaven National Lab

The All-Inclusive Processing Hot Cells At Building 801

EPA DOE and BSA support BNL

- EPA works with DOE on many projects as part of the federal family.
- EPA has worked with the BNL and is involved on several fronts.
- The last NESHAP application approved by EPA was in 2009 for the Brookhaven Linac Isotope Production facility and several other authorizations are active.
- Required emissions monitoring is ongoing and reported in the annual NESHAP report that is sent to EPA.
- EPA is taking an openness position and partnering on engagement with state/local agencies and the public and was invited to present to the CAC.
- EPA will engage, be open, coordinate with DOE/BSA, while retaining its independent regulatory position representing the public interest as a steward of the environment.

Evaluation Process

- EPA is working with DOE Site Office (BHSO) and the Lab to develop a complete application meeting the requirements of the standards.
- EPA staff will have 60 days to complete review upon acceptance of a complete application.
- EPA will inform state and local agencies of our activities and actions.
- Consideration of factors under review includes the following:
 1. Appropriate air pollution controls
 2. Evaluation of the proposed operation including releases
 3. Emergency or accident conditions
 4. Environmental Justice to NY State identified communities
 5. Near site maximally exposed member of the public
 6. Tribal Communities nearby

NESHAP is an EPA rule

- Radionuclides are listed under CAA Section 112 and 40 CFR 61 promulgated to address this, specifically Subpart H applying to DOE facilities.
- Projects with a potential for airborne radionuclide emissions are evaluated (modeled) in accordance with 40 CFR 61 for the potential to cause a dose exceeding 0.1 millirem to the maximally exposed member of the public under the assumption no pollution controls are in place.
- If the modeled emission exceeds 0.1 mrem, EPA is required to review and approve (or deny) the application submitted from DOE.
- The standard (NESHAP) requires a complete application, stack sampling and analysis, offsite dose projection and annual reports to EPA.

ENVIRONMENTAL MONITORING

- Emissions from an individual source cannot be directly measured even relatively near the site boundary. For potential emissions (before a new emission source is created), EPA uses a computer model CAP-88 to estimate off-site dose.
- The model is used before EPA authorization to estimate offsite dose from actual emissions because concentrations of radionuclides from most emissions are so low that environmental monitoring is difficult.
- The model is applied annually by the site and reviewed by EPA based on measured emissions.

There is not formal public notice or open comment period.

Information at these links:

- <https://www.epa.gov/compliance/national-emission-standards-hazardous-air-pollutants-compliance-monitoring>
- <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9>
- <https://www.epa.gov/haps/hazardous-air-pollutants-sources-and-exposure>

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thank you

tenki hvala takk спасибо kam sah hamnida
дзякуй dhanyavadagalu tack
gracias blagodaram mèsi xièxie tanemirt
arigatô manana diolch shukriya ありがとう kia ora dankon děkuji
dziękuję bedankt danke kop khun krap faafetai lava
ačiū grazzi mamnun gràçie kaitos spas
dhanavad barka mamnun gràçie sulpáy tapadh leat
chnorakaloutioun
teşekkür ederim bayarlalaa σας ευχαριστώ obrigada
sagolun murakoze taiku mahalo didi madioba chokrane rahmat
sukriya obrigado dakujem
terima kasih misaotra welain mercé najis tuke
ar ك ش
asante grazie nandri 謝謝 mersi köszönöm sobodi
mauruuru matondo cám on ban go raibh maith agat merci nanni vinaka
paldies ngiyabonga