Company Overview

Alaron Nuclear Services (Alaron), a part of the Veolia Nuclear Solutions – Federal Services (VNSFS), is a fully licensed and integrated Radioactive Materials Facility located in Wampum, Pennsylvania.

Strategically located near multiple utilities and other facilities in the nuclear industry, Alaron provides support services to utilities and companies engaged in the nuclear marketplace. Alaron is a one-stop location for everything from decontamination and equipment repair to low-level waste (LLW) processing and disposal.

Alaron has serviced the nuclear industry from its fixed-based operations location since 1986. Our goal is to continue to provide innovative services to companies and utilities engaged in the nuclear marketplace.

Alaron brings together key services under one roof so that our customers can experience systemic repairs, maintenance and upgrades on their nuclear-related components and tooling. Alaron’s services include:

- licensed facility access
- hot machine shop
- large component processing and metals recycling
- motor test and rebuild
- pump rebuild and balance
- weld services, fabrication and repair
- Service Level I and other specialty coatings
- decontamination for free release
- waste segregation and material processing for Class A, B, and C Low-Level Waste
- volume reduction, disposal services and special projects.

Alaron’s facility is situated on 26 acres with six on-site operations locations and 150,000 square feet of indoor work and contaminated equipment storage space. Alaron maintains an integrated rail spur with a run-around and a private switch engine. Alaron’s rail spur runs directly into a 9,600-square-foot operations building with a 125-ton overhead crane designed to accommodate truck to rail transfer of spent fuel casks.

Alaron operations are performed in accordance with its Quality Assurance Program (NQA-1a-2009 Addenda, 10 CFR 50 App B, 10 CFR 71 Subpart H), Corporate Health and Safety Program, and Radiation Protection Program. These programs were developed to protect the health and safety of Alaron’s employees as well as the general public and environment. The programs identify the requirements necessary for Alaron employees, contractors and subcontractors to perform work at temporary job sites as well as Alaron’s operations facility.

These programs were developed to meet the requirements of ISO, OSHA, OHSAS and the Nuclear Regulatory Commission requirements. Each temporary job location will have (if required) a site-specific Health and Safety Plan generated for the work to be performed. These plans are developed in accordance with Alaron’s Corporate Health and Safety Program. Alaron is ISO 45001 Certified.
Alaron Services Summary

Alaron specializes in asset recovery, risk mitigation, and disposal liability minimization through various decontamination and volume reduction techniques.

Annually, thousands of tons of radioactive material are processed at this facility, including NORM and TENORM materials, dry active waste, metals, soil, rubble, pumps and motors, tooling, and large components originating from nuclear power plants such as turbine rotors and large heat exchangers.

Alaron provides decontamination for unrestricted use, and refurbishment and restoration services. Decontamination for unrestricted use effectively removes surface-contaminated items from a customer’s inventory of radioactive waste liability. Alaron can evaluate cold storage and outage tooling inventories, and release, organize, and repackage the containers, reducing the utility cost for the replacement of contaminated or misplaced tooling. With its heavy lift capabilities and ample operations space, Alaron is also experienced and capable of handling, disassembling, and processing large components.

Throughout this process, recyclable materials are segregated from other waste streams, decontaminated, released for unrestricted use, and returned to service or reintroduced into their respective markets.

ITEMS REGULARLY DECONTAMINATED INCLUDE:

- Lead blankets, batteries, and other lead components
- Electrical equipment such as controllers, relays, circuit boards, displays, printers, and computers
- Scaffolding, heavy construction equipment (backhoes, tractors, etc.)
- Utility components and maintenance and outage tooling (welding units, robotics, laser scanners, actuators, pumps, motors, hand tools etc.)
- Large components (turbine rotors, heat exchangers, moisture separator re-heaters, steam dryers, etc.)
- Alaron releases equipment for unrestricted use to the limits set forth in Table 1 of “Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Materials,” U.S. Nuclear Regulatory Commission, April 1993.

Coatings

Alaron provides surface preparation and application of specification/safety-related coatings for nuclear power plants and other industries requiring a high-adhesion, temperature-resistant system. Work is performed under our NQA-1 Quality Assurance Program.

Facility Access

Alaron provides a radiological workspace and personnel support for companies involved in the nuclear industry that do not have access to their own licensed facility. Typical support involves the establishment of a designated workspace, radiation protection/health physics support, and supplemental labor.
**Field Services**
Alaron provides on-site services for nuclear utilities and companies involved in the nuclear industry. Services provided include project management, radiation protection, shipping support, packaging, characterization, and project labor.

**Free Release**
Alaron reviews and evaluates contaminated and/or potentially contaminated equipment and components. If the radioactive constituents can be removed through decontamination, these items may be recoverable assets. Using this service, customers realize measurable savings through reuse of their recovered equipment, eliminating disposal liability and replacement costs.

**Motor Shop**
Alaron provides services in our fully equipped, environmentally controlled shop for companies repairing contaminated electric motors for nuclear power plants. Our assets include two disassembly stands, a test stand, a burn-out/bake-out oven, balancers, and vertical and horizontal lathes. Alaron provides radiation protection/health physics support, a dedicated workspace, disassembly services, decontamination, coatings and reassembly.

**Waste Processing**
Alaron provides waste processing services, including sorting and segregating, processing and consolidation, characterization, decontamination, volume reduction, repackaging, and transportation to disposal by truck or rail for all Class A, B, and C low-level rad waste and sealed sources.
Veolia Nuclear Solutions – Federal Services

VNS Federal Services (VNSFS) is the nuclear operations company of Veolia, delivering solutions on nuclear, waste management, remediation and secure infrastructure challenges to the U.S. government and clients across North America.

We provide an integrated value chain to the nuclear industry that includes a comprehensive range of innovative technologies and robotics, engineering, waste operations and infrastructure and analytical services for facility operations, remediation, decommissioning and the treatment of radioactive waste.

About Veolia Nuclear Solutions

Veolia Nuclear Solutions is a leading world-class player in nuclear facility clean-up and treatment of radioactive waste. It offers a broad range of expertise in the nuclear and environmental sectors, unique technological solutions, world-class experience in complex operations, risk mitigation and management discipline. All this is accomplished through a dedicated commitment to performance and safety worldwide.

www.nuclearsolutions.veolia.com

About Veolia

With 160 years of expertise in the areas of water, energy and waste, Veolia applies its capacity for innovation to pursuing human progress and wellbeing and improving the performance of businesses and regions throughout the world. Veolia designs and implements solutions aimed at improving access to resources while at the same time protecting and renewing those same resources.

www.veolia.com
**Insurance Certificate**

**CERTIFICATE OF LIABILITY INSURANCE**

**VNS Federal Services**

**Statement of Qualifications**

<table>
<thead>
<tr>
<th>PRODUCER</th>
<th>Marsh USA, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADDRESS</td>
<td>540 W. Madison St.</td>
</tr>
<tr>
<td>CHICAGO, IL 60606</td>
<td></td>
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**INSURED:**

- Veda E. S. Alston, LLC
- DBA Alston Nuclear Services
- 2138 State Route 18
- Warrington, PA 18976

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<tr>
<th>INSRN(A) AFFORDING COVERAGE</th>
<th>INSURER A: National Union Fire Insurance Company of Pittsburgh 1946</th>
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<tr>
<td>INSURER B: New Hampshire Insurance Company 20883</td>
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<td>INSURER C: AIS Specialty Insurance Company 29999</td>
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<tr>
<td>INSURER D: ACE Property and Casualty Insurance Company 19437</td>
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<td>INSURER E: Liverpool Insurance Company 22867</td>
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**COVERAGES**

- **TYPE OF INSURANCE:** General Liability
- **AMOUNT of INSURANCE:** $1,000,000
- **POLICY NUMBER:** GL165835
- **DATE DEFINED:** 01/01/2020
- **LIMITS:** $1,000,000

- **AUTO/CUST LiABILITY:**
  - **AMOUNT of INSURANCE:** $1,000,000
  - **POLICY NUMBER:** CAS71446 (AC5)
  - **DATE DEFINED:** 01/01/2020
  - **LIMITS:** $1,000,000

- **UMBRELLA LiABILITy:**
  - **AMOUNT of INSURANCE:** $1,000,000
  - **POLICY NUMBER:** XOD03727996-005
  - **DATE DEFINED:** 01/01/2020
  - **LIMITS:** $1,000,000

- **WORKERs COMPENSATION AND EMPLOYEE LiABILITY:**
  - **AMOUNT of INSURANCE:** $1,000,000
  - **POLICY NUMBER:** WC186-U-2882 (AC5)
  - **DATE DEFINED:** 01/01/2020
  - **LIMITS:** $1,000,000

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<th>C</th>
<th>CPC02122961</th>
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<th>01/01/2021</th>
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<tr>
<td>E</td>
<td>EAO - SRC: $2,000,000</td>
<td>01/01/2020</td>
<td>01/01/2021</td>
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</table>

**DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES:**

Clean-up Liability,播出和 Third Party Bodily Injury/Property Damage Liability (Underlying) are covered under Pollution Liability.

**CERTIFICATE HOLDER**

- Veda E. S. Alston, LLC
- DBA Alston Nuclear Services
- 2138 State Route 18
- Warrington, PA 18976

**CANCELLATION**

- **SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.**

**ACORD 25 (10/16/03)**

<table>
<thead>
<tr>
<th>PAGE 5 OF 24</th>
<th>NUCLEAR SOLUTIONS - FEDERAL SERVICES</th>
</tr>
</thead>
</table>

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## ADDITIONAL REMARKS SCHEDULE

| AGENCY      | Marsh USA, Inc.                  | NAMED INSURED | VEOLIA F&S Assurance, LLC  
|-------------|----------------------------------|---------------|-----------------------------
| POLICY NUMBER |                                  | DAC #          | DBA Azura Nuclear Services  
| CARRIER     |                                  | 10103035      | 2130 State Route 18  
|             |                                  | MAC CODE      | Waringum, PA 16107         
| EFFECTIVE DATE |                                |               |                             

### ADDITIONAL REMARKS

**THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,  
FORM NUMBER: 25  
FORM TITLE: Certificate of Liability Insurance**

**Workers Compensation (Cont.)**

- Carrier: Insurance Company of the State of Pennsylvania  
  Policy Number: WC-046-91-2826 (MA, NJ, CT, NH, WI, WY)  
  Effective Date: 01/01/2021  
  Expiration Date: 01/01/2023  
  Limit: SEE ABOVE

- Carrier: American Home Assurance (NAIC # 19360)  
  Policy Number: WC-046-91-2826 (CA)  
  Effective Date: 01/01/2022  
  Expiration Date: 01/01/2023  
  Limit: SEE ABOVE

**Pollution Legal Liability**

- Policy Number: WTD0325080203  
  Carrier: Lloyd's Syndicates G200322  
  Effective Date: 01/01/2021  
  Expiration Date: 01/01/2023  
  Limit: $5,000,000  
  WR: $750,000

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The ACORD name and logo are registered marks of ACORD.
This is to certify that

Veolia ES Alaron, LLC.
2138 State Route 18, Wampum, Pennsylvania, 16157, USA

operates an

Occupational Health & Safety Management System

which complies with the requirements of

ISO 45001:2018

for the following scope of certification

The decontamination and disposal of radioactive waste, the refurbishment of pumps and motors, paint coatings of equipment and components and facility access for customer on-site activities.

Certificate No.: CERT-0134793
File No.: 1685316
Issue Date: March 13, 2020

Original Certification Date: May 24, 2017
Certification Effective Date: May 23, 2020
Certificate Expiry Date: May 22, 2023

Heather Mahon
Global Head of Technical Services
SAI Global Assurance

ISO 45001
WWW.SAI-GL.COM/REGISTER

SAI GLOBAL
INFORM. INSPIRE. IMPROVE.

NUCLEAR SOLUTIONS - FEDERAL SERVICES
Statement of Qualifications

Radioactive Materials License

<table>
<thead>
<tr>
<th>Licensee</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Veolia ES Alaron, LLC d/b/a Alaron Nuclear Services</td>
<td>In response to renewal application dated November 6, 2018 and electronic</td>
</tr>
<tr>
<td></td>
<td>correspondence dated April 1, 2020.</td>
</tr>
<tr>
<td>2. 2138 State Route 18 Wampum, PA 16157-9320</td>
<td>3. License No. PA - 0678 is amended as follows.</td>
</tr>
<tr>
<td></td>
<td>4. Expiration Date: December 31, 2028</td>
</tr>
<tr>
<td></td>
<td>5. Client ID: 356 Program Code 3234 Priority: 2</td>
</tr>
<tr>
<td>6. Byproduct, source, and/or special nuclear material</td>
<td>7. Chemical and/or physical form</td>
</tr>
<tr>
<td>A. Any byproduct or source material with Atomic Numbers 1 through 96,</td>
<td>8. Maximum amount that licensee may possess at any one time under this</td>
</tr>
<tr>
<td>inclusive</td>
<td>license</td>
</tr>
<tr>
<td>B. Depleted or natural Uranium</td>
<td>A. Fixed or removable contamination, including dry solid materials and</td>
</tr>
<tr>
<td>C. Depleted Uranium</td>
<td>wastes and wet and aqueous liquid wastes</td>
</tr>
<tr>
<td>D. Any byproduct or source material with Atomic Numbers 1 through 96,</td>
<td>B. Any</td>
</tr>
<tr>
<td>inclusive</td>
<td>C. Solid metal</td>
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<tr>
<td>E. Hydrogen 3</td>
<td>D. Sealed sources</td>
</tr>
<tr>
<td>F. Any byproduct or source material with Atomic Numbers 2 through 91,</td>
<td>E. Sealed sources</td>
</tr>
<tr>
<td>inclusive</td>
<td>F. Sealed sources</td>
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<tr>
<td>G. Any byproduct material with Atomic Numbers 93 or greater</td>
<td>G. Sealed sources</td>
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<tr>
<td>H. Special Nuclear Material</td>
<td>H. Any</td>
</tr>
<tr>
<td>I. Californium-252</td>
<td>I. Sealed Source (Frontier Technologies Corp Model 100 series)</td>
</tr>
</tbody>
</table>

9. Authorized use:
A. For the possession and repackaging of ores and similar raw materials containing naturally occurring and source material. See Condition 15.
A., B., and H. For the possession, storage, use, maintenance, repair, and decontamination of contaminated equipment. For possession, storage, processing, packaging, and shipping of dry solid and wet and aqueous liquid contaminated waste. See Condition 15.

C. For possession and use as shielding material in the fabrication of transport casks.

D. and H. For possession and use as calibration and check sources.

E., F. For possession and transfer incident to recycling or packaging for disposal and packaging and shipping waste at temporary job sites. See Condition 15.

I. For possession and storage related to measurement and testing equipment.

CONDITIONS

10. Licensed material may be used or stored at the licensee’s facilities located at 2138 State Route 18, Wampum, PA 16157 and may be used at temporary job sites of the licensee anywhere in the Commonwealth of PA where the Commonwealth maintains jurisdiction for regulating the use of licensed material. Authorization for use of radioactive materials at job sites under exclusive Federal jurisdiction or in Agreement States shall be obtained from the appropriate regulatory agency.

11. The licensee shall not vacate or release for unrestricted use any field office, storage location, or other listed facility whose address is identified in Condition 10 without prior approval from the Department.

12. The Radiation Safety Officer for this license is Julian J. Owoc II.

13. Licensed material shall be used by, or under the supervision of, Julian J. Owoc II, Michael K. Oltowski, or John M. Boughner.


15. The licensee shall not store licensed material contained in waste for more than 2 years from the date the waste is put into storage. The licensee shall maintain records which indicate the date that the licensed material contained in waste is put into storage. Materials which are utilized by the licensee in performance of tasks authorized by the license may be possessed for more than two years provided that a separate current inventory record be maintained at all such times.

16. The licensee shall notify The Department of Environmental Protection, 400 Market Street, Harrisburg, PA 17101, in writing 3 days prior to the establishment of a temporary job site. The notification shall include the address of the temporary facility and the expected duration of activities at the job site. At the conclusion of activities at a temporary job site, the licensee shall submit to the Department, a copy of surveys performed prior to the release of the facility for unrestricted use.

17.
18. Notwithstanding the requirement of 10 CFR Part 20, Appendix G, Section III E.1, any shipment or part of a shipment for which acknowledgement is not received within the applicable times shall be investigated by the licensee if the licensee has not received notification or receipt within 35 days after transfer.

19. 

20. The licensee shall conduct a physical inventory, every 6 months, to account for all sealed sources and devices containing licensed material received and possessed under the license. Records of inventories shall be maintained for 5 years from the date of each inventory and shall include the radionuclides, quantities, manufacturer's name and model numbers and the date of the inventory.

21. Notwithstanding the requirements set forth in this license, the licensee shall comply with the regulations set forth in Title 25 of the Pennsylvania Code, Article V “Radiological Health” and the U.S. Nuclear Regulatory Commission, Title 10 Code of Federal Regulations Parts 19-150 incorporated by reference.

22. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. The Department of Environmental Protection's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

August 7, 2017

Mr. Julian J. Owoc II
Radiation Safety Officer
Alaron Nuclear Services
2138 State Route 18
Wampum, PA 16157

Re: Burn Off Oven
Application No. GP4-37-320B
BAQ-GPA/GP-4
APS ID No. 945331, AUTH ID No. 1189902

Dear Mr. Owoc,

The Department has received your application to construct and/or operate a burn off oven under the Air Quality general plan approval and operating permit (BAQ-GPA/GP4). You are hereby authorized to use the burn off oven in accordance with the conditions of BAQ-GPA/GP4.

This authorization is for the operation of the following at your facility in New Beaver Borough, Lawrence County, and is valid for a five-year period:

- One (1) natural gas fuel fired burn off oven, Manufactured by Blu-Surf
  - Equipped with an afterburner and secondary chamber
  - Installed 2002
  - Rated 15 lbs/hr

This authorization may be renewed by the submittal of a renewal application and the renewal fee at least thirty days prior to the expiration of the permit. If a Title V or State Only Operating Permit has been issued for this facility, the General Permit will be incorporated into the Title V or State Only Operating Permit and the General Permit will not be renewed. If the Title V or State Only Operating Permit has not been issued at the time this general permit expires, the general permit must be renewed.
Mr. Julian J. Owoc II 2 August 7, 2017

I suggest that you carefully review BAQ-GPA/GP-4 to assure that all applicable terms and conditions will be met. If the Department can be of any further assistance, please contact David G. Balog, P.E., the region’s New Source Review Section Chief, at (814) 332-6328. Thank you.

Sincerely,

Eric A. Gustafson
Program Manager
Air Quality Program

Issue Date: 08/07/2017
Expiration Date: 07/31/2022

Attachment: BAQ-GPA/GP-4

cc: File/AQ/Fac/Permit/GP-37-00320B
    HSBG/Air Quality Permits Section
    NCDO
GENERAL PLAN APPROVAL AND GENERAL OPERATING PERMIT
BAQ-GPA/GP – 4
BURN OFF OVENS

GENERAL CONDITIONS

1. Statutory Authority and General Description

   In accordance with Section 6.1(f) of the Air Pollution Control Act, 35 P.S. §§4006.1, end 25 Pa.
   Code §§127.514 and 127.611, the Department of Environmental Protection (Department) hereby
   issues this general plan approval and general operating permit for burn off ovens (hereinafter
   referred to as “Burn Off Ovens General Permit”).

2. Applicability/Source Coverage Limitations

   Approval herein granted to operate under this Burn Off Ovens General Permit is limited to:
   
a. Burn off ovens designed to remove cured hydrocarbon coatings, grease or oils from
   metal parts. The burn off ovens shall not be used to burn coatings that contain
   halogenated hydrocarbons like PVC, or Teflons.
   
b. Burn off ovens fueled by natural gas supplied by a public utility, liquified petroleum gas,
   or by commercial fuel oils which are No. 2 or lighter.

3. Application for Use

   Any person proposing to operate or construct under this Burn Off Ovens General Permit shall
   make application to the Department using the Burn Off Ovens General Permit Application
   provided by the Department and shall receive prior written approval from the Department as
   required under 25 Pa. Code §127.621 (relating to application for use of general plan approvals
   and general operating permits).

4. Compliance

   Any burn off oven operating under this Burn Off Ovens General Permit must comply with the
   terms and conditions of the general permit. The burn off ovens and any associated air cleaning
devices shall be:

   a. Operated in such a manner as not to cause air pollution.

   b. Operated and maintained in a manner consistent with good operating and maintenance
      practices.

   c. Operated and maintained in accordance with the manufacturer’s specifications and the
      applicable terms and conditions of this Burn Off Ovens General Permit.

5. Permit Modification, Suspension and Revocation

   This Burn Off Ovens General Permit may be modified, suspended, or revoked if the Department
   determines that affected burn off ovens cannot be regulated under this general permit, or the
   permittee fails to comply with applicable terms and conditions of the Burn Off Ovens General
   Permit.
The approval herein granted to operate the burn off ovens shall be suspended, if, at any time, the permittee causes, permits or allows any modification (as defined in 25 Pa. Code §121.1) of the burn off ovens and any associated air pollution control device covered by this general permit, in a way that is not in accordance with this general permit. Upon suspension of the general permit, the permittee may not continue to operate or use said burn off ovens. If warranted, the Department will require that the burn off ovens be permitted under the state operating permit or Title V operating permit requirements in 25 Pa. Code Chapter 127, if applicable.

6. Notice Requirements

Any notification submitted to the Department shall be sent to the appropriate Regional Office responsible for issuing general permits in the county in which the burn off oven is located.

The permittee shall not construct a new source under this Burn Off Ovens General Permit until and unless the appropriate Regional Office is notified that said construction is to be conducted and written approval to construct is received. Said notification of construction shall be accompanied by the fees described in Condition 12.

The permittee shall immediately notify the Department of any malfunction of the burn off oven which results in, or may possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code, Subpart C, Article III (relating to air resources).

7. Sampling and Testing

If, at any time, the Department has cause to believe that air contaminant emissions from a burn off oven covered by this General Permit are in excess of the limitations specified in, or established pursuant to, any applicable regulation contained in 25 Pa. Code, Subpart C, Article III, the permittee shall conduct tests deemed necessary by the Department to determine the actual emission rate(s).

The permittee shall perform such testing in accordance with applicable provisions of 25 Pa. Code Chapter 139 (relating to sampling and testing) and in accordance with any restrictions or limitations established by the Department at the time the permittee is notified, in writing, of the testing requirement.

8. Monitoring, Recordkeeping and Reporting

The permittee shall comply with applicable monitoring, recordkeeping and reporting requirements set forth in 25 Pa. Code Chapter 135 (relating to reporting of sources), 139 (relating to sampling and testing), the Air Pollution Control Act, the Clean Air Act, or the regulations thereunder as applicable to the source.

The permittee shall, upon Department request, provide fuel analysis, or fuel samples, of the fuel used in the burn off oven. The permittee shall install, maintain, and operate a temperature indicator and recorder to measure and record the temperature in the secondary chamber of the burn off oven.

Records under this general permits shall be kept for a period of five (5) years and shall be made available to the Department upon its request.

9. General Permits at Title V Facilities

Any burn off oven located at a "Title V facility" as defined in 25 Pa. Code §121.1, shall comply with the requirements of 25 Pa. Code §127.514 (relating to general operating permits at Title V facilities).
The requirements of 25 Pa. Code §127.511 (relating to monitoring and related recordkeeping and reporting requirements) shall be met through recordkeeping and reporting procedures comparable to those requirements specified in Condition 8.

10. Permit Shield

Unless precluded by the Clean Air Act or regulations promulgated thereunder, the permit shield provision contained in 25 Pa. Code §127.816 (relating to permit shield) shall apply to a burn off oven operating under this Burn Off Ovens General Permit.

11. Term of Permit

This Burn Off Ovens General Permit is valid for a fixed term of five years.

12. Permit and Administrative Fees

This Burn Off Ovens General Permit establishes the following application and permit renewal fees:

a. Two hundred fifty dollars during the 1995-1999 calendar years.

b. Three hundred dollars during the 2000-2004 calendar years.

c. Three hundred seventy-five dollars beginning in the 2005 calendar year.

13. Expiration and Renewal of Permit

The permittee’s right to operate under this Burn Off Ovens General Permit terminates on the date of expiration of this permit unless a timely and complete renewal application is submitted to the Department 30 days prior to the permit expiration date.

Upon receipt of a complete and timely application for renewal, the burn off ovens may continue to operate subject to final action by the Department on the renewal application. This protection shall cease to exist if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by the Department any additional information required by the Department to process the renewal application.

Application for renewal of this Burn Off Ovens General Permit shall be made on the same forms described in Condition 3, and include the appropriate renewal fee listed in Condition 12. At a minimum, the permit renewal fee shall be submitted to the Department at least 30 days prior to the expiration of the Burn Off Ovens General Permit.

14. Applicable Laws

Nothing in this Burn Off Ovens General Permit relieves the permittee from its obligation to comply with all applicable Federal, state and local laws and regulations.

15. Prohibited Use

Any stationary air contamination source that is subject to the requirements of 25 Pa. Code Chapter 127, Subchapter D (relating to prevention of significant deterioration) and 25 Pa. Code Chapter 127, Subchapter E (relating to new source review) may not operate burn off ovens under this Burn Off Ovens General Permit.
16. Transfer of Ownership or Operation

The permittee may not transfer the Burn Off Ovens General Permit except as provided in 25 Pa. Code §127.464 (relating to transfer of operating permits).

17. Malfunctions

The permittee shall immediately notify the Department of any malfunction of plant equipment or associated air cleaning device(s) which results in, or may possibly be resulting in the emission of air contaminants in excess of any applicable limitation.

18. Plan Approval

This Burn Off Ovens General Permit authorizes construction of Burn Off Oven(s) that meets best available technology (BAT) required under 25 Pa code §§127.1 and 127.12(a)(5). For the purposes of this general permit, BAT shall include installation of a secondary chamber capable of reducing particulate matter emissions to or below 0.02 grains per dry standard cubic foot (gridsf) corrected to 12% CO₂.

The burn off oven secondary chamber shall be designed to: a) maintain a minimum temperature of 1400°F during the period of operation; and, b) have a minimum retention time of gas within the secondary chamber of at least 0.5 seconds.

19. Emission Limitations

The operation of a burn off oven shall not at any time result in the emission of:

a. Particulate matter emissions in excess of:

i. 0.04 gridscf as specified in 25 Pa. Code §123.13(c)(i) for units installed prior to March 29, 1997.

ii. 0.02 gridscf as specified in condition 18. for units installed on or after March 29, 1997.

b. Visible emissions from air pollution control devices in excess of the following limitations:

i. Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.

ii. Equal to or greater than 60% at any time.

c. Sulfur compound emissions in excess of 500 parts per million, by volume, dry basis, as specified in 25 Pa. Code §123.21.

d. Odor emissions in such a manner that the malodors are detectable outside the property of the permittee as specified in 25 Pa. Code §123.31.
20. Minimum Operating Parameters

For units installed on or after October 12, 1986, the burn off oven secondary chamber shall be maintained at a minimum temperature of 1400°F during the period of operation. This minimum temperature of 1400°F must be established prior to the commencement of parts burn off in the burn off chamber. Instrumentation shall be provided for the monitoring of the secondary chamber temperature. The minimum retention time of gas within the secondary chamber shall be 0.5 seconds.

21. Operating Restrictions

Burn off ovens shall not be used to burn coatings that contain halogenated hydrocarbons like PVC, or Teflons.

22. Emission Limitations and/or Operating Requirements Previously Established Pursuant to Best Available Technology and/or Imposed to Give Synthetic Minor Status

This Burn Off Oven General Permit cannot be used to vacate best available technology or other emission limitations or requirements established through the air quality permitting process. The Department shall memorialize these limitations in the letter of authorization granted in accordance with Condition 3.

Originally signed by: February 25, 1987

Approved by: Joyce E. Epps
Director
Bureau of Air Quality

Date Approved
Solid Waste Permit

2540-PM-BWMO009  6/2005

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Permit
For
Solid Waste Disposal and/or Processing Facility
FORM NO. 8

Perm No. 301369
Date Issued November 16, 2017
Date Expires November 16, 2027

Under the provisions of the Pennsylvania Solid Waste Management Act of July 7, 1980, Act 97, a permit for a solid waste disposal and/or processing at (municipality) New Beaver Borough in the County of Lawrence is granted to (applicant) Alaron Nuclear Services (address)

Site: 2138 State Route 18
Wampum, PA 16157

This permit is applicable to the facility named

Alaron Nuclear Services – Residual Waste Transfer Station and described as:

Latitude: 40° 51' 30.8822"
Longitude: 80° 19' 35.5907"

This permit is subject to modification, amendment and supplement by the Department of Environmental Protection and is further subject to revocation or suspension by the Department of Environmental Protection for any violation of the applicable laws or the rules and regulations adopted thereunder, for failure to comply in whole or in part with the conditions of this permit and the provisions set forth in the application no. 301369 which is made a part hereof, or for causing any condition inimical to the public health, safety or welfare.

See attachment for waste limitations and/or special conditions

Christine S. Weltchel
FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

THIS PERMIT IS NON-TRANSFERABLE
Page 1 of 7
1. This permit is being issued pursuant to the Pennsylvania Solid Waste Management Act of July 7, 1980 and the Residual Waste Management Regulations (PA Code Title 25, Chapters 287–299) most recent effective version. This permit is issued for the construction and operation of the Alaron Nuclear Services – Residual Waste Transfer Station, pursuant to, and including, the Application for Residual Waste Permit, notarized on September 8, 2015 and the following information:
   
a. Revisions dated April 22, 2016 and September 30, 2016
   
b. All other related submissions/correspondence.

2. All amendments or modifications to this permit shall be issued by the Department in writing. Such amendments shall be attached hereto and shall become effective on the date specified thereupon.

3. If there is conflict between the application, its support documents and/or amendments on one hand, the Rules and Regulations and/or Act 97 on the other hand, the Rules and Regulations and the Act shall apply unless a specific condition of this permit authorizes a specific variance to a requirement contained therein. There are no specific variances granted in this permit.

4. This permit is issued for the facility as shown on Drawing SW03, labeled “Alaron Nuclear Services – Residual Waste Transfer Station, New Beaver Borough, Lawrence Co., PA”, as prepared by Civil and Environmental Consultants, dated March 4, 2015.
5. This facility is permitted to accept waste for processing on six days during each week. The permitted days and hours of operation are:

   Monday through Saturday: 5:30 AM to 5:30 PM.

6. The permittee may accept and process Technically-Enhanced Naturally Occurring Radioactive Material (TENORM) containing residual wastes. Waste types may include sludges, filtration media, containment, spill remediation and soil-like residual waste materials generated by the natural gas exploration and production industry. Residual waste codes that may be accepted are 801-812, 899 and 999.

7. The permittee is prohibited from accepting or disposing of any hazardous waste at the facility.

8. All residual waste must be measured and screened when it is received at the facility.

9. The Radiation Monitoring and Action Plan shall be implemented in accordance with the approved plan.

10. Litter shall not be allowed to be blown or otherwise deposited off-site.

11. No more than a maximum of 400 tons/day of residual waste may be received at this facility for processing on any single operating day.

12. No more than 500 tons of residual waste shall be on-site at any one time.
13. Any increase in the maximum daily waste received amount will require a major permit modification to be submitted to the Department's Northwest Regional Office (NWRO) Waste Management Program. Written approval from the Department is required prior to an increase in the daily waste received amount.

14. A copy of the Preparedness, Prevention, and Contingency Plan (PPC Plan) must be readily available on-site. The permittee shall immediately implement the applicable provisions of the approved contingency plan whenever there is an emergency as required by 25 Pa. Code §293.243.

15. The facility shall be identified by posting and maintaining a sign. The sign shall be constructed of a durable, weather-resistant material. The sign shall show in a clearly visible and readable form the name, business address and telephone number of the person that operates the facility, the operating hours of the facility and the number of the current permit authorizing operations at the facility.

16. A security gate and fence shall be maintained as specified in the approved plans. Access to the site shall be limited to times when an attendant is on duty.

17. The loading, unloading and storage and related activities shall be kept clean.

18. All residual waste shall be stored in accordance with PA Code Title 25, Chapter 299, Subchapter A (relating to standards for storage of residual waste). The permittee shall perform routine inspections of the facility, its equipment and surrounding area for evidence of failure and shall immediately take necessary corrective actions. The permittee shall maintain records of inspections and corrective actions that were taken.
19. This permit does not authorize, nor shall be construed to be an approval to discharge industrial waste, including without limitation, any leachate discharge from the permitted area to waters of the Commonwealth, absent a permit from the Clean Water Program pursuant to the Clean Streams Law.

20. The Annual Operations Report shall be submitted to the Department as required in 25 Pa. Code §293.252 of the Department's Residual Waste Management Rules and Regulations. In addition, the permittee shall provide a list of all wastes received including: generator name, Residual Waste Code, and tonnage or volume.


22. A written update of the total bond liability for the facility under 25 Pa. Code §287.331 must be submitted in conjunction with the annual report. If additional bond is determined to be necessary, it shall be submitted to the Department within ninety (90) days after the annual report is due.

23. A daily operational record must be maintained at the site meeting the requirements of 25 Pa. Code §293.251.

24. Under this permit, the permittee is responsible for the processing and/or disposal operations and the conditions at the site to the extent required by the Pennsylvania Solid Waste Management Act, the Clean Streams Law, the Rules and Regulations promulgated thereunder, as well as any decisional law interpreting the aforesaid statutes and regulations.

25. Nothing in this permit shall be construed to supersede, amend or authorize violation of the provisions of any valid and applicable local law, ordinance or regulation provided that said local law, ordinance or regulation is not preempted by the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. 76018.101, et seq.
26. As a condition of this permit, and of the permittee's authority to conduct the activities authorized by this permit, the permittee hereby authorizes and consents to allow authorized employees or agents of the Department, without advance notice or a search warrant, upon presentation of appropriate credentials, and without delay, to have access to and to inspect all areas on which solid waste management activities are being or will be conducted. The authorization and consent shall include consent to collect samples of waste, water or gases, to take photographs, to perform measurements, surveys and other tests, to inspect any monitoring equipment, to inspect the methods of operation, and to inspect and/or copy documents, books or papers required by the Department to be maintained. This permit condition is referenced in accordance with Sections 603 and 610(7) of the Solid Waste Management Act (Act 97).

27. Approval of any plans or facility herein refers to functional design, but does not guarantee stability or operational efficiency. Failure of the measures and facility herein approved to perform as intended, or as designed, or in compliance with the applicable Rules and Regulations of the Department, for any reason, shall be grounds for the revocation or suspension of this permit. Failure of the permittee to comply with the terms of permit or conditions, or failure of the permittee to construct or operate the proposed facility in conformity with the approved plans shall be grounds for the revocation or suspension of this permit.

28. Any final operation, design or other plan developed subsequent to permit issuance which exhibits changes in the structures, locations, specifications, or other changes of substance shall be submitted to the Department for subsequent permit action. Any deviation of plans herein approved shall not be implemented before first obtaining a permit amendment or written approval from the Department.
29. The permittee has proposed mitigation of harms and has identified benefits of the project to the public in the application submissions. Based upon the Department's evaluation of the environmental assessment, of which the harms/benefits analysis is part of, it has been determined that the benefits of the project clearly outweigh the known and potential harms as required by 25 Pa. Code §287.127(d) of the Residual Waste Regulations. Failure to complete all mitigation measures in the application submissions or failure to provide for all the benefits accepted by which the Department based its analysis may result in permit suspension, permit revocation, and/or other appropriate enforcement actions.

30. The Department's analysis and review of the Environmental Assessment for this facility is attached to this permit as Exhibit EA1.