

# Alaron Nuclear Services

## 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.

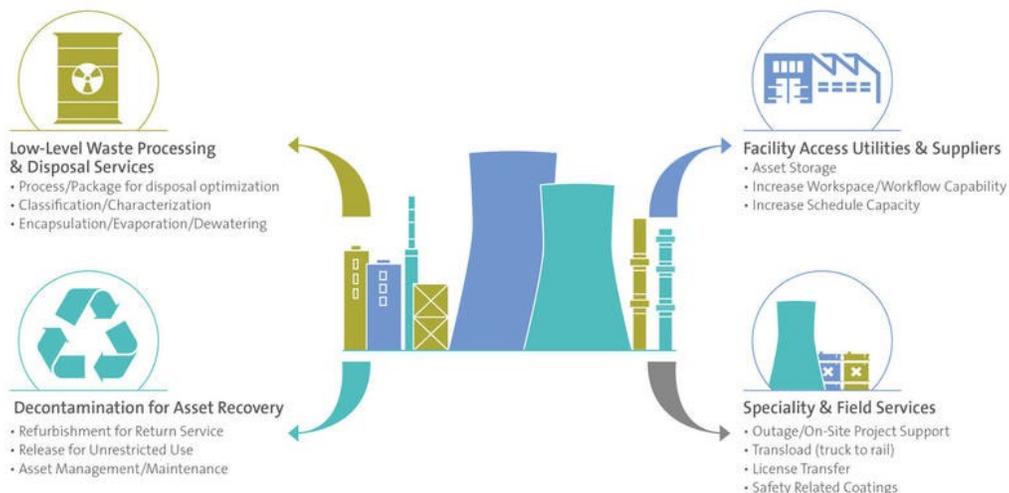
**Motor Shop**

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.

**Alaron's Licensed and Integrated Radioactive Materials Facility**



### **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.

[www.vnsfederalservices.com](http://www.vnsfederalservices.com)

### **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](http://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](http://www.veolia.com)

Insurance Certificate



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)  
12/29/2022

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> Marsh USA, Inc. 540 W. Madison Street Chicago, IL 60661 Attn: Veolia.CertRequest@marsh.com   Fax: 212-948-5053		<b>CONTACT NAME:</b> PHONE (A/C, No, Ext): E-MAIL: ADDRESS:		FAX (A/C, No):	
VESAL Wampu		<b>INSURER(S) AFFORDING COVERAGE</b>		<b>NAIC #</b>	
<b>INSURED</b> Veolia ES Alaron, L.L.C. 2138 State Route 18 Wampum, PA 16157		<b>INSURER A :</b> Everest National Insurance Company		10120	
		<b>INSURER B :</b> Everest Premier Insurance Company		16045	
		<b>INSURER C :</b> N/A		N/A	
		<b>INSURER D :</b> Lloyd's Syndicates 623/2623			
		<b>INSURER E :</b>			
		<b>INSURER F :</b>			

**COVERAGES**      **CERTIFICATE NUMBER:** CHI-008065763-45      **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL ISUBR INSD WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:		RM5GL00068-231 (All Other) RM5GL00067-231 (Utility Operations)	01/01/2023 01/01/2023	01/01/2024 01/01/2024	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 1,000,000 PRODUCTS - COM/OP AGG \$ 1,000,000 \$
A	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY <input type="checkbox"/> AUTOS ONLY		RM5CA00066-231 (AOS) RM5CA00065-231 (MA) RM5CA00064-231 (Utility Operations) (DE, ID, NY, NJ, PA, RI)	01/01/2023 01/01/2023 01/01/2023	01/01/2024 01/01/2024 01/01/2024	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$ \$
	<input type="checkbox"/> UMBRELLA LIAB <input type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> DED <input type="checkbox"/> RETENTION \$					EACH OCCURRENCE \$ AGGREGATE \$ \$
B	<input checked="" type="checkbox"/> WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input checked="" type="checkbox"/> N <input type="checkbox"/> A	RM5WC00092-231 (AOS) RM5WC00094-231 (FL,ME,NJ) RM5WC00095-231 (WI,MA)	01/01/2023 01/01/2023 01/01/2023	01/01/2024 01/01/2024 01/01/2024	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
D	Pollution Legal Liability Claims Made Form		W1D4C8230701 SIR \$750,000	01/01/2023	01/01/2024	Per Claim 5,000,000 Aggregate 5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

<b>CERTIFICATE HOLDER</b> Veolia ES Alaron, LLC dba Alaron Nuclear Services Attn: Kimberly Tindall Kimberly.Tindall@veolia.com 2138 State Route 18 Wampum, PA 16157	<b>CANCELLATION</b> SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.  AUTHORIZED REPRESENTATIVE  <i>Marsh USA Inc.</i>
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AGENCY CUSTOMER ID: CN102584993  
LOC #: Chicago



ADDITIONAL REMARKS SCHEDULE

Page 2 of 2

AGENCY Marsh USA, Inc.		NAMED INSURED Veolia ES Alaron, L.L.C. 2138 State Route 18 Wampum, PA 16157	
POLICY NUMBER		EFFECTIVE DATE:	
CARRIER	NAIC CODE		

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: Everest Premier Insurance Company  
Policy Number: RM5WC00093-231 (Utility Operations) (DE, ID, NY, PA, RI)  
Effective Date: 01/01/2023  
Expiration Date: 01/01/2024  
Limit: SEE ABOVE

Carrier: Everest Premier Insurance Company  
Policy Number: RM5EW00005-231 (Excess) (Utility Operations) (NJ)  
Effective Date: 01/01/2023  
Expiration Date: 01/01/2024  
Limit: SEE ABOVE

ACORD 101 (2008/01)

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ISO 45001 Certificate

# Certificate

Standard **ISO 45001:2018**

Certificate Registr. No. 74 300 4970

Certificate Holder: **Veolia ES Alaron, LLC**  
2138 State Route 18  
Wampum PA 16157-2926  
USA

Scope: **Recycling through decontamination and refurbishment of received waste, equipment and components and provide facility access for customer's on-site activities.**

Proof has been furnished by means of an audit that the requirements of ISO 45001:2018 are met.

Validity: **The certificate is valid from 2023-05-23 until 2026-05-22.  
First certification 2017**

2023-04-05

  
TUV Rheinland of North America, Inc.  
295 Foster Street, Suite 100, Littleton,  
MA 01460

www.tuv.com



**Radioactive Materials License**

**Official Use Only – Security Related Information**

	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF RADIATION PROTECTION	Page 1 of 3 Pages  License No. PA - 0678
	<b>RADIOACTIVE MATERIALS LICENSE</b>	Amendment No. 14

Pursuant to the Radiation Protection Act, the Act of July 10, 1984 (No. 147, P.L. 688) (35 P.S. §§ 7110.101 – 7110.703) and Title 25. Rules and Regulations, Article V. Radiological Health of the Pennsylvania Department of Environmental Protection, and in reliance on statements and representations heretofore Licensee to receive, acquire, possess, transfer, and use radioactive material listed below for the purposes and at the places designated below. This license shall be deemed subject to all applicable rules, regulations, or orders of the Pennsylvania Department of Environmental Protection now or hereafter in effect and to any conditions specified below.

Licensee 1. Veolia ES Alaron, LLC d/b/a Alaron Nuclear Services  2. 2138 State Route 18 Wampum, PA 16157-9320		In response to correspondence dated June 16, 2021 and September 22, 2021  3. License No. PA – 0678 is amended as follows:  4. Expiration Date: December 31, 2028  5. Client ID: 356    Program. Code: 3234    Priority: 2	
<b>6. Byproduct, source, and/or special nuclear material</b>	<b>7. Chemical and/or physical form</b>	<b>8. Maximum amount that licensee may possess at any one time under this license</b>	
A. Any byproduct or source material with Atomic Numbers 1 through 96, inclusive	A. Fixed or removable contamination, including dry solid materials and wastes and wet and aqueous liquid wastes	A.	
B. Depleted or natural Uranium	B. Any	B.	
C. Depleted Uranium	C. Solid metal	C.	
D. Any byproduct or source material with Atomic Numbers 1 through 96, inclusive	D. Sealed sources	D.	
E. Hydrogen 3	E. Sealed sources	E.	
F. Any byproduct or source material with Atomic Numbers 2 through 91, inclusive	F. Sealed sources	F.	
G. Any byproduct material with Atomic Numbers 93 or greater	G. Sealed sources	G.	
H. Special Nuclear Material	H. Any	H.	
I. Californium-252	I. Sealed Source (Frontier Technologies Corp Model 100 series)	I.	
<b>9. Authorized use:</b>  A. For the possession and repackaging of ores and similar raw materials containing naturally occurring and source material. See Condition 15.			

**Official Use Only – Security Related Information**

Official Use Only – Security Related Information

	COMMONWEALTH OF PENNSYLVANIA	Page 2 of 3 Pages
	DEPARTMENT OF ENVIRONMENTAL PROTECTION	License No. PA - 0678
	BUREAU OF RADIATION PROTECTION	Amendment No. 14
<b>RADIOACTIVE MATERIALS LICENSE</b>		

- 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. and G.** 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 or John M. Boughner.
- 14. The licensee may transport licensed material, or deliver licensed material to a carrier for transport, in accordance 25 Pa Code Chapter 230, "Packaging and Transportation of Radioactive Material" and the provisions of 10 CFR Part 71 incorporated by reference.
- 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.

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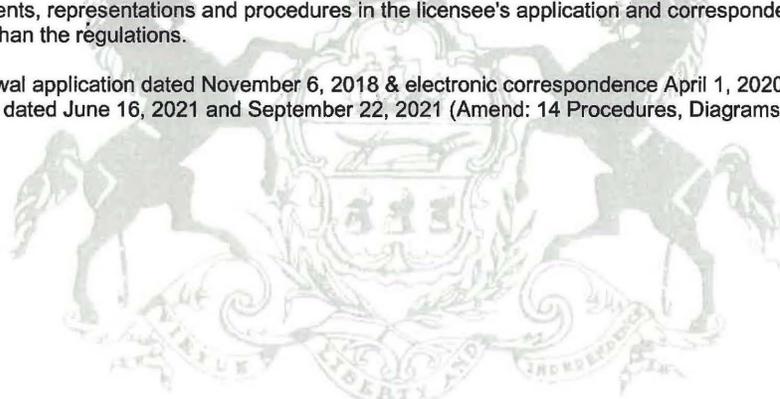


COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF RADIATION PROTECTION

Page 3 of 3 Pages  
License No. PA - 0678  
Amendment No. 14

**RADIOACTIVE MATERIALS LICENSE**

- 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.
  - A. Renewal application dated November 6, 2018 & electronic correspondence April 1, 2020 (Amend: 13)
  - B. Letter dated June 16, 2021 and September 22, 2021 (Amend: 14 Procedures, Diagrams, & TOC)



For the Pennsylvania Department of Environmental Protection

Joshua M. Myers  
Bureau of Radiation Protection  
P. O. Box 8469  
Harrisburg, PA 17105-8469

Date: March 3, 2022

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**Air Permit for Burn Off Oven**

July 15, 2022

Veolia ES Alaron, LLC d/b/a Alaron Nuclear Services  
Mr. Dave Garber  
Vice President/General Manager  
2138 State Route 18  
Wampum, PA 16157-2926

Re: Burn Off Oven  
Permit No. GP4-37-320C  
Auth Id: #1398886, APS 1064937, PF 628996  
New Beaver Borough, Lawrence County

Dear Mr. Garber,

The Department has received your application for authority to continue operating the following under the Air Quality general plan approval and/or operating permit for burn off ovens (BAQ-GPA/GP-4). This general plan approval/operating permit No. GP4-37-320C, will authorize the following source at this site:

*101 – Burn Off Oven:* This source consists of a natural gas fired burn off oven that was manufactured by Blu-Surf, Model # 10911. Its rated capacity is 15 lbs/hr. This unit was manufactured in September of 1992 and installed at the site in July of 2002.

The burn off oven will meet the criteria for GP-4 because it will be fueled using natural gas and will not be used to burn coatings that contain halogenated hydrocarbons.

This burn off oven must operate meeting the requirements of Condition 4.

This burn off oven is equipped with a chart recorder as specified in Condition 8.

This application is for a general operating permit rather than a plan approval, which means that the plan approval requirements of condition 18 are not applicable.

This burn off oven meets the particulate matter emissions limit of 0.02 gr/dscf, based on the combustion of natural gas as a fuel. This limit comes from Condition #19(a)(i).

This burn off oven has a secondary chamber meeting the requirements of Condition #20.

This oven is not used to burn coatings that contain halogenated hydrocarbons as required in condition #21.

Northwest Regional Office | Air Quality Program  
230 Chestnut Street | Meadville, PA 16335 | 814.332.6935 | Fax 814.332.6121 | [www.dep.pa.gov](http://www.dep.pa.gov)

Mr. Dave Garber

- 2 -

July 15, 2022

You are hereby authorized to use BAQ-GPA/GP-4 in accordance with your application. This authorization is for the operation of the above equipment at the facility in New Beaver Borough, Lawrence County, and is valid for a five-year period. The authorization may be renewed by the submittal of a renewal application and 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 the general permit expires, the general permit must be renewed.

If the Department can be of any further assistance, please contact me, a 814-332-6328, or by email at [dbalog@pa.gov](mailto:dbalog@pa.gov).

Sincerely,

*David G. Balog*

David G. Balog, P.E.  
New Source Review Section Chief  
Air Quality Program

Issuance Date: July 15, 2022  
Expiration Date: June 30, 2027

Attachment: BAQ-GPA/GP-4

cc: OnBase General Permit GP4-37-320C  
S. Dyll, NCDO (via email)

**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY**

**GENERAL PLAN APPROVAL AND GENERAL OPERATING PERMIT  
(BAQ-GPA/GP-4)  
Burn Off Ovens**

1. **Statutory Authority and General Description** -- In accordance with Section 6.1(f) of the Air Pollution Control Act, 35 P.S. § 4006.1, and 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 § 127.516 (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.

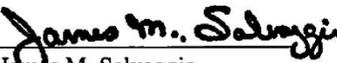
14. **Applicable Laws** -- Nothing in this Burn Off Ovens General Permit relieves the permittee from its obligation to comply with all applicable Federal, state and local laws and regulations.
15. **Prohibited Use** -- Any stationary air contamination source that is subject to the requirements of 25 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 (gr/dscf) corrected to 12% CO<sub>2</sub>.

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 gr/dscf as specified in 25 Pa. Code § 123.13(c)(i) for units installed prior to March 29, 1997.
    - ii. 0.02 gr/dscf 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, 1996, 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.

Approved by:



James M. Salvaggio  
Director  
Bureau of Air Quality

Date Approved: February 25, 1997

### Solid Waste Permit

2540-PM-BWM0009 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

Permit No.	<u>301369</u>
Date Issued	<u>November 16, 2017</u>
Date Expires	<u>November 16, 2027</u>

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

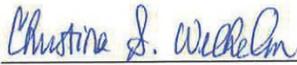
This permit is applicable to the facility named

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

  
FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

THIS PERMIT IS NON-TRANSFERABLE  
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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

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

Permit No.	<u>301369</u>
Date Issued	<u>November 16, 2017</u>
Date Expires	<u>November 16, 2027</u>

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.

THIS PERMIT IS NON-TRANSFERABLE  
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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

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

Permit No.	<u>301369</u>
Date Issued	<u>November 16, 2017</u>
Date Expires	<u>November 16, 2027</u>

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.

THIS PERMIT IS NON-TRANSFERABLE  
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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
12.BUREAU OF WASTE MANAGEMENT

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

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

- 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.

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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

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

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

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.
21. A current certificate of insurance, as specified in 25 Pa. Code §287.375 (a) evidencing continuous coverage for public liability insurance as required by 25 Pa. Code §287.371, shall be submitted in conjunction with the Annual Operations Report.
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. §6018.101, et seq.

THIS PERMIT IS NON-TRANSFERABLE  
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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

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Date Issued	<u>November 16, 2017</u>
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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.

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COMMONWEALTH OF PENNSYLVANIA  
THIS PERMIT IS NON-TRANSFERABLE  
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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

Permit  
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Date Issued	November 16, 2017
Date Expires	November 16, 2027

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.

THIS PERMIT IS NON-TRANSFERABLE  
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