

Compliance and Reporting

Complying with air permits and regulations can be a very burdensome process. Through an understanding of permit conditions, New Source Performance Standards (NSPS), and National Emissions Standards for Hazardous Air Pollutants (NESHAP), INTERA helps organizations understand applicable regulations and how best to comply with them. We design compliance registers to help organizations keep track of air compliance needs and provide reminders when it is time to conduct routine inspections, maintenance, monitoring, and reporting. Emission inventories, Title V reports and certifications, NSPS and NESHAP reporting, Greenhouse Gas reporting, and Toxic Release Inventories (TRI) are just some of the reports that we prepare and file on behalf of clients. We develop the documentation and calculations in accordance with the reporting standards, review them with clients, and provide guidance throughout the submittal and review process.

Our air quality compliance and reporting services include:

- Enterprise-wide Compliance Strategy and Implementation
- Recordkeeping Documentation and Tool Development
- Control Technology Assessments
- Emissions Inventories
- Compliance Audits
- Compliance Enforcement and Legal Support
- Federal GHG reporting under 40 CFR Part 98

Be it through best practices or engineering and pollution controls, INTERA develops customized solutions that align with each client's business objectives.



■ Licensing of an Interim Storage Facility for Spent Nuclear Fuel, Texas, USA

Challenge: To assess air quality emissions impacts in support of licensing a spent nuclear fuel (SNF) storage facility.

Solution: In support of licensing the Consolidated Interim Storage Facility (CISF), INTERA collected information from the site via a review of proposed construction and operation documents. Emissions sources included those from the construction and operational phases of the CISF and consist largely of criteria pollutants that fall under the NAAQS. Emissions were calculated for each stationary source using methodologies prescribed by EPA's AP-42 and industry-accepted practices. Once the emissions were calculated, they were evaluated against the NAAQS to determine if the impacts would contribute to a significant impact to existing air quality. Emissions modeling was conducted using EPA's AERMOD model for each affected emission point to generate a UIM. A maximum offsite impact was determined, and then compared to NAAQS to determine the impacts to off-property human health and vegetation. Background concentrations were determined based on publicly available monitoring data at the TCEQ monitoring sites nearest to the proposed facility. Ultimately, the modeling demonstrated that all emissions related to the construction and operation of the proposed facility complied with the applicable standards. INTERA interacted with site staff and participated in public hearings with the U.S. Nuclear Regulatory Commission (NRC) as it pertained to the ongoing review of the licensing application.

Results: Successfully obtained NRC license required to construct and operate the CISF.

