

LEGAL NOTICE and Preliminary Determination for an Air Quality Permit  
for International Isotopes Fluorine Products Inc

International Isotopes Fluorine Products Inc, 4137 Commerce Circle, Idaho Falls, ID has submitted an air quality permit application to the Air Quality Bureau (AQB), New Mexico Environment Department (NMED) for an air quality permit to construct International Isotopes Fluorine Products Facility. The application file has been assigned Permit No. 4573 and TEMPO Agency Interest ID No. 30806. The exact location of the facility will be at latitude 32°43'10.45" N and longitude 103°20'22.68" W. To aid in locating this facility, this facility is located approximately 10 miles W. of Hobbs in Lea County, New Mexico.

The proposed construction will consist of a depleted uranium processing facility that provides services to the uranium enrichment industry for deconversion of depleted uranium hexafluoride (DUF<sub>6</sub>) into uranium oxide for long-term stable disposal. The company will also include a commercial plant to produce specialty fluoride gas products for sale. High-purity silicon tetrafluoride (SiF<sub>4</sub>) and boron trifluoride (BF<sub>3</sub>) will be manufactured in the IIFP facility by utilizing the fluorine derived from the de-conversion of DUF<sub>6</sub>. The fluoride gas products are highly valuable for applications in the electronic, solar panel, and semi-conductor markets. In addition, anhydrous hydrogen fluoride (AHF) is a by-product of the de-conversion process and is sold as an important chemical for various industrial applications..

Total air pollutant emissions to the atmosphere are estimated to be approximately Nitrogen Oxides (NO<sub>x</sub>) at 3.0 tons per year (tpy); Carbon Monoxide (CO) at 3.0 tpy; Total Suspended Particulate Matter (TSP) at 2.0 tpy, and Particulate Matter 10 microns or less (PM<sub>10</sub>) at 0.7 tpy. The facility is a minor, < 100,000 tpy CO<sub>2</sub>e, source of green house gas emissions. These emission estimates could change slightly during the course of the Department's review of the application.

In addition to the criteria pollutants listed above, this facility is also a source of two hazardous air pollutants ,HAPs, (HF) and (Uranium) and five state toxic air pollutants , TAPs, (Fluoride, Uranium, BF<sub>3</sub>, Ca(OH)<sub>2</sub>, and B<sub>2</sub>O<sub>3</sub>). The combined controlled emissions for the HAPs is less than 0.06 tons per year, far below the Title V permitting threshold of 10 (for individual HAPs) and 25 (for combined HAPs) tons per year. The individual pounds per hour controlled emissions rates for the TAP are below their respective pound per hour permitting thresholds. The permit will contain conditions that monitor the HAP and TAP emissions.

The NMED has conducted a preliminary review of the information submitted with the permit application. The preliminary review and applicant's analysis of ambient air quality impacts indicates that the facility's air emissions will meet the ambient air quality standards for NO<sub>x</sub>, CO, SO<sub>x</sub> TSP, PM<sub>10</sub>, and PM<sub>2.5</sub>. A full review will evaluate the estimated emission rates for the pollutants listed above and the air quality analysis to determine compliance with the associated ambient air standards and requirements.

The requested allowable emissions for hazardous air pollutants is less than 10 <sup>tons/yr</sup>, and the requested allowable emissions for the state toxic air pollutants are less than the pound per hour permitting threshold for each pollutant. Conditions will be included in the permit to monitor the emissions of hazardous air pollutants and state toxic air pollutants.

Based on the applicant's analysis, a preliminary determination is that this facility will comply with the requirements of Title 20, New Mexico Administrative Code (NMAC), Chapter 2, Parts 3, 61, 72, 73, and 75; 40 CFR 50; and the New Mexico Air Quality Control Act. Therefore, the preliminary intent of

NMED is to issue the air quality permit on or before January 11, 2012. This source is a minor source according to 20.2.74 NMAC, PSD.

To ensure compliance with state and federal air regulations, the permit is expected to include conditions that limit the emissions, and conditions that will require record keeping and reporting to the Department.

The permit application is available for review in electronic or hard copy at the Air Quality Bureau Office, 1301 Siler Road, Building B, Santa Fe, New Mexico. To arrange viewing of this application contact Teri Waldron, at 505-476-4355 or [teri.waldron@state.nm.us](mailto:teri.waldron@state.nm.us). The permit application is also available at the NMED Hobbs Office, located at 726 E. Michigan - Suite 165, Hobbs, NM 88240 for public review.

All interested persons have thirty (30) days from the date this notice is published, to notify the Department in writing of their interest in the permit application. The written comments should refer to the company name, site name and Permit No. (or send a copy of this notice along with your comments). The written comments shall state the nature of the issues raised and how it relates to the requirements of applicable state and federal air quality regulations and the Clean Air Act. The written comments should be mailed to Sam Speaker, New Mexico Environment Dept., Air Quality Bureau, Permit Section, 1301 Siler Road, Building B, Santa Fe, New Mexico 87507-3113.

The Department will notify all persons, who have provided written comments, as to when and where the Department's analysis may be reviewed. Although all written comments will be made part of the public record, any person who does not express interest in writing prior to the end of this first thirty (30) day period will not receive such notification.

If the Department receives written public comment prior to the end of the Department's thirty (30) day public notice, the Department's analysis will be made available for review for thirty (30) days at the NMED district or field office nearest to the source before the permit will be issued. Written comments on the analysis or permit application may be submitted to the Department during this second thirty (30) day period or at any time before the permit is issued or denied.

Questions or comments not intended to be part of the public record can be directed to Saml Speaker at 505-476-4351. General information about air quality and the permitting process can be found at the Air Quality Bureau's web site. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC. This regulation can be found in the "Permits" section of this web site.