

Enclosure 3:

Seven Administrative Amendment items for Revision B (6/30/2007 cut-off date) of 2006 AOP Renewal

1. Include Order DE07NWP-001, issued 4/19/2007, HAMMER facility.
 - Change wording in Page 9 of 31 (STGC) to not exclude the facility from AOP.
 - Add 2 pages to Section 1.4.4 Table 1.6 of Attachment 1 (i.e., Pages ATT 1-83-iv and ATT-83-v).

2. Include Order DE07NWP-002, issued 6/20/2007, 100B Export Water Enhancement (Project L-626).
 - Add 5 pages to Section 1.4.4 Table 1.6 of Attachment 1 (i.e., Pages ATT-83-vi to ATT-83-x).

3. Include Order DE07NWP-003, issued 6/6/2007, Effluent Treatment Facility (ETF) modification, and remove voided Orders NOC-93-3 and 96NW-1-301.
 - Replace the two original pages for ETF in Table 1.6 of Attachment 1 (i.e., Pages ATT 1-47 and ATT 1-48).

4. Delete Order DE04NWP-002 (initially issued on 12/15/2004 and subsequently amended on 9/5/2006 and 11/13/2006), Demonstration Bulk Vitrification System. The Order is currently invalid due to discontinuity of construction over 18 months (5/9/2007 letter from ECY to USDOE-ORP).
 - Delete AOP Pages ATT 1-73 to ATT 1-76.

5. Delete three 300 Area boilers from the AOP. The boilers were permanently shut down per 5/22/2007 letter from DOE-RL to ECY.
 - Delete 328 Boiler1 and 337 Boilers 1 & 2 from Table 1.1: List of Significant Emission Units of AOP Attachment 1 (Page ATT 1-6).
 - Delete 328 Boiler1 and 337 Boilers 1 & 2 from Table 1.3: Emission Limits for Steam Generating Units of AOP Attachment 1 (Page ATT 1-14).

6. Change PEcoS to PermaFix (name change effective 6/18/2007).
 - Modify Page 10 of 31 (AOP STGC).
 - Modify Page 10 of 56 (SoB of AOP STGC).

7. Obsolete reference to Attachment 2 tables for Tier 3 survey in Attachment 1. The change avoids possible future inconsistency whenever Attachment 2 is modified.
 - Modify Page ATT 1-87 (AOP Attachment 1).

2.0 GENERAL PROCESS INFORMATION

The Hanford Site was acquired by the federal government in 1943 and for many years was dedicated primarily to the production of plutonium for national defense and the management of the resulting waste. With the shutdown of the production facilities in the 1970s and 1980s, missions were redirected to decommission and site cleanup, and diversified to include research and development in the areas of energy, waste management, and environmental restoration. Decommissioned facilities or emission units are those that can not be operated as is, and are not planned to operate again. In an extremely unlikely event that a decommissioned facility or emission unit is reactivated, an applicable requirements assessment must be completed first.

The Hanford Site, located in south central Washington State, occupies about 1,450 square kilometers (approximately 560 square miles) of semi-arid shrub and grasslands just north of the confluence of the Snake and Yakima Rivers with the Columbia River. This land, with restricted public access, provides a buffer for the smaller areas historically used for the production of nuclear materials, waste storage, and waste disposal. About 6% of the land area has been disturbed and is actively used or excluded from this permit under documented CERCLA authority. This 6% used land is divided into the following five operational areas:

- 100 Area, including 100-B/C, 100-D, 100-DR, 100-F, 100-H, 100-K, and 100-N Areas, which lie along the south shore of the Columbia River in the northern portion.
- 200 Area, including 200 East and 200 West Areas, which lie in the center near the basalt outcrops of Gable Mountain and Gable Butte.
- 300 Area, near the southern border of the Hanford Site.
- 400 Area, between the 300 and 200 Areas.
- 600 Area, land between the other operational areas located on the Central Plateau.

Other areas and facilities that support Hanford Site activities can be found in the nearest cities (i.e., Richland, Kennewick, and Pasco). The facilities in these areas are not considered part of the Hanford Site major source because these areas are not considered contiguous or adjacent to the Hanford Site. These areas include, but are not limited to, the following facilities:

- 700 Area in Richland, i.e., 825 Jadwin, 748 Building, and 712 Building on Jadwin Avenue.
- Richland Central (RCHC) Area, i.e., Butler Loop facilities and the Hanford Technical Training Center.
- 1100 Area, Stevens Center, Evergreen Facilities, Cold Test Facility, various PNNL facilities (as specified herein), Benton County Sheriff's Facilities including firing range and training.

The Major stationary source covered by this permit includes the following North American Industry Classification System (NAICS) categories:

Discharge Point: HAMMER Training and Education Facility

Volpentest Hazardous Materials Management and Emergency Response (HAMMER) Training and Education Facility (2890 Horn Rapids Road, Richland, Washington)

Requirement Citation (WAC or Order Citation): DE07NWP-001

Condition Approval: 4/19/2007

Condition: Visible emissions from training operations shall not exceed twenty (20) percent opacity. [WAC 173-400-040(1)]

Periodic Monitoring: Tier 2 Visible Emissions Survey requirements of the Hanford Air Operating Permit if visible emissions from training operations materials, other than those from "fog machines," are exhibited outside training structures.

Test Method: Tier 2 Visible Emissions Survey requirements Section 2.1 of the Hanford AOP, Attachment 1 and/or EPA Method 9.

Test Frequency: Once per year, if visible emissions are observed (see Periodic Monitoring).

Required Records: Records of Tier 2 visible emission event surveys including EPA Method 9 results.

State-Only: No.

Calculation Model: Not applicable.

Condition Approval: 4/19/2007

Condition: Fugitive emissions from training operations shall be minimized. [WAC 173-400-040(3)(a)]

Periodic Monitoring: Use of operating procedures: (1) keep containers closed when not in use, and (2) ensure proper handling and storage to minimize unintentional losses.

Test Method: Not specified.

Test Frequency: Not applicable.

Required Records: Records of (1) fugitive release control procedure training, and (2) events which detail non-compliance with fugitive release control procedures or unintentional releases and response to such events.

State-Only: No

Calculation Model: Not applicable

Condition Approval: 4/19/2007

Condition: Particulate Matter emissions from training materials shall not exceed 1,500 pounds per year (lb/yr). [WAC 173-400-110(5)(d)]

Periodic Monitoring: Material record-keeping.

Test Method: Not applicable.

Test Frequency: Not applicable.

Required Records: Material balance records which detail materials receipt and disposal, with a summary assessment of losses calculated each calendar quarter.

State-Only: No.

Calculation Model: Not applicable.

Discharge Point: HAMMER Training and Education Facility

Volpentest Hazardous Materials Management and Emergency Response (HAMMER) Training and Education Facility (2890 Horn Rapids Road, Richland, Washington)

Requirement Citation (WAC or Order Citation): DE07NWP-001

Condition Approval: 4/19/2007

Condition: Volatile Organic Compound (VOC) emissions from training materials shall not exceed 4,000 pounds per year (lb/yr). [WAC 173-400-110(5)(d)]

Periodic Monitoring: Material record-keeping.

Test Method: Not applicable.

Test Frequency: Not applicable.

Required Records: Material balance records which detail materials receipt and disposal, with a summary assessment of losses calculated each calendar quarter.

State-Only: No.

Calculation Model: Not applicable.

Condition Approval: 4/19/2007

Condition: Emissions of all TAPs, as identified in Table 1 of NOC Order DE07NWP-001, or newly identified, shall be below their respective SQERs. Emission of any TAP exceeding SQERs detailed in Table 1 of Order DE07NWP-001 shall be reported to Ecology in accord with WAC 173-400-107. Identification of any TAP not previously identified within Order DE07NWP-001, shall be submitted to Ecology within 90 days of initiation of use in training with an estimate of annual emissions. [WAC 173-460-080(2)(e)]

Periodic Monitoring: Material record-keeping.

Test Method: Not applicable.

Test Frequency: Not applicable.

Required Records: Material balance records which detail materials receipt and disposal, with a summary assessment of losses calculated each calendar quarter.

State-Only: No.

Calculation Model: Not applicable.

Discharge Point **100B-181B/182B**

100 Area, Emergency Diesel Engines

Requirement Citation (WAC or Order Citation): DE07NWP-002

Condition Approval **6/27/2007**

Condition: Visible emissions will not exceed 20 % during acceleration mode [described in 40 CFR §86.884-7(a)(2)]. [WAC 173-400-040(1), 40 CFR §60.4205(b), and 40 CFR §89.113(a)(1)].
Visible emissions will not exceed 15 % during lugging mode [described in 40 CFR §86.884-7(a)(3)]. [40 CFR §60.4205(b), and 40 CFR §89.113(a)(2)].
Visible emissions will not exceed 50 % during peak in either acceleration or lugging mode. [WAC 173-400-040(1)(a), 40 CFR §60.4205(b), and 40 CFR §89.113(a)(3)].

Periodic Monitoring: Use Tier 1 Visible Emission Survey (Section 2.1 of AOP Attachment 1), unless otherwise specified (see Test Frequency below).

Frequency: See Test Frequency below.

Test Method: Tier 1 Visible Emissions Survey and EPA Method 9 (40 CFR §60, App. A).

Test Frequency: Each engine authorized by this order shall be surveyed for visible emissions during maintenance and readiness testing and emergency-use based upon the following frequency or events:
(1) During maintenance and readiness testing, a visible emission survey shall be conducted with each readiness test startup,
(2) During emergency-use operations exceeding, or anticipated to exceed, eight hours duration, a visible emissions survey shall be conducted daily,
(3) Visible emissions of each engine shall be determined by procedures detailed in 40 CFR 86 Subpart I (40 CFR §86.884 et seq.) within 90 days of initial startup and as required by Ecology.

Required Records: Results of visible emissions survey and EPA Method 9 tests conducted pursuant to periodic monitoring.

State-Only No.

Calculation Model Not applicable.

Discharge Point **100B-181B/182B**

100 Area, Emergency Diesel Engines

Requirement Citation (WAC or Order Citation): DE07NWP-002

Condition Approval **6/27/2007**

Condition: Emissions of Nitrogen Oxides (NO_x) and Non-methane Hydrocarbons (NMHC) will not exceed 14.2 tons per year. [WAC 173-400-091, AP 42 emission factors for engines in NOC application operating 500 hours per year].
Emissions of Carbon Monoxide (CO) will not exceed 5 tons per year. [WAC 173-400-110(5)(d)].
Emissions of particulate matter (PM) will not exceed 0.75 tons per year. [WAC 173-400-110(5)(d)].

Periodic Monitoring: Compliance will be demonstrated by
(A) Engine Limitation
(1) Installation of engines certified to meet emission limitations of 40 CFR §89 [40 CFR §60.4211(c)], and
(2) Installation of one engine rated no higher than 450 horsepower (HP) and two engines rated no higher than 900 HP each; and
(B) Operational Limitation
(1) All recommended operation and equipment maintenance provisions supplied by the manufacturer(s) of the engine(s) will be current [40 CFR §60.4211(a)],
(2) Operational monitoring in accord with installed non-resettable hour meter on each engine [40 CFR §60.4209(a)],
(3) Operational hours of use for each engine, for purposes of maintenance checks and readiness testing shall not exceed 100 hours per year unless approved by the Administrator of the United States Environmental Protection Agency [40 CFR §60.4211(e)], and
(4) Operational hours of use during emergency conditions shall not be limited provided maintenance of records of emergency use are consistent with Required Records below.

Frequency: Not specified.

Test Method: Not applicable.

Test Frequency: Not applicable.

Required Records: (1) Manufacturer's engine certifications,
(2) Maintenance records, and
(3) Records of cumulative operating hours for each engine, calculated semiannually, retained for a minimum of 36 months,

State-Only No.

Calculation Model Not applicable.

Discharge Point **100B-181B/182B**

100 Area, Emergency Diesel Engines

Requirement Citation (WAC or Order Citation): DE07NWP-002

Condition Approval **6/27/2007**

Condition:	Emissions of sulfur dioxide will not exceed two tons per year [WAC 173-400-110(5)(d)].
Periodic Monitoring:	Compliance will be demonstrated by use of fuel containing (1) no greater than 0.05 weight percent sulfur (500 parts per million by weight) from installation to May 30, 2010 [40 CFR §60.4207(a), 40 CFR §80.510(a)], and (2) no greater than 0.015 weight percent sulfur (15 parts per million by weight) on and after June 1, 2010 [40 CFR §60.4207(b), 40 CFR §80.510(b)].
Frequency:	Not specified.
Test Method:	Not applicable.
Test Frequency:	Not applicable.
Required Records:	Diesel fuel quality shall be documented by annual fuel analysis or vendor documentation of fuel purchases from retail outlet(s) that demonstrate compliance with diesel fuel quality standards of 40 CFR §80.510 for all purchases.
State-Only	No.
Calculation Model	Not applicable.

Discharge Point 100B-181B/182B

100 Area, Emergency Diesel Engines

Requirement Citation (WAC or Order Citation): DE07NWP-002

Condition Approval 6/27/2007

Condition: Emission rates of installed engines shall not exceed values identified in the table below [40 CFR §60.4205(b) and 40 CFR §89.112].

Pollutant	Engine Rating	Gram/kilowatt-hour (g/kW-hr)	Pound/horsepower-hour (lb/HP-hr)
Carbon Monoxide	130 to 560 kW (174 to 751 HP)	3.5	5.8E-03
Particulate Matter	130 to 560 kW (174 to 751 HP)	0.2	3.3E-04
Non-methane Hydrocarbons and Nitrogen Oxides	130 to 560 kW (174 to 751 HP)	4.0	6.6E-03
	>560 kW (>751 HP)	6.4	1.1E-02

Periodic Monitoring: Compliance shall be demonstrated by:

- (1) procuring and installing only engines certified to emission standards of 40 CFR §60.4205(b) for the same model year and maximum engine rating [40 CFR §60.4211(c)].
- (2) operating and maintaining the stationary compression ignition internal combustion engines and control devices according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer [40 CFR §60.4211(a)].
- (3) installing and configuring the engines according to manufacturer specifications [40 CFR §60.4211(c)].
- (4) maintaining records of engine certification as detailed in the Required Records below.

Frequency: Not specified.

Test Method: Not applicable.

Test Frequency: Not applicable.

Required Records: (1) Manufacturer's engine certifications.
(2) Records of cumulative operating hours for each engine, calculated semi-annually, will be retained for a minimum of 36 months.
(3) Records of emergency use operational duration and the basis of the emergency.

State-Only No.

Calculation Model Not applicable.

Discharge Point

P-2025E ETF

200E Area, Effluent Treatment

Requirement Citation (WAC or Order Citation): DE07NWP-003

Condition Approval 6/6/2007

Condition: Visible emissions from the ETF stack (Figure 1 of Order DE07NWP-003) shall not exceed five percent (5%).
Visible emissions from the ETF STU stack (Figure 2 of Order DE07NWP-003) shall not exceed five percent (5%).

Periodic Monitoring: Tier 3 Visible Emission Survey, Section 2.1 of AOP ATT 1.

Test Method: Not specified.

Test Frequency: Not applicable.

Required Records: As required in AOP Attachment 2 for maintaining abatement control technology.

State-Only No.

Calculation Model Not applicable.

Condition Approval 6/6/2007

Condition: Visible emission from the ETF STU dry material storage bins (Figure 2 of Order DE07NWP-003) shall not exceed 20 percent (20%). [WAC 173-400-040(1)]

Periodic Monitoring: Tier 2 Visible Emission Survey, Section 2.1 of AOP ATT 1.

Test Method: Record-keeping and EPA Method 9.

Test Frequency: Once a year.

Required Records: Annual surveillance records and/or EPA Method 9 test results.

State-Only No.

Calculation Model Not applicable.

Condition Approval 6/6/2007

Condition: Volatile Organic Compound (VOC) emissions from the ETF (Figure 1 of Order DE07NWP-003) shall not exceed 0.50 gram per minute (g/min).
Volatile Organic Compound (VOC) emissions from the ETF (Figure 1 of Order DE07NWP-003) shall not exceed 0.55 gram per cubic meter (g/m³) at standard conditions.

Periodic Monitoring: Initial compliance verified by EPA Method 18 in 1996 (NOC-93-3).

Test Method: EPA Method 18 or 25A.

Test Frequency: Not applicable (initial test condition for construction).

Required Records: Testing Results of 1996 EPA Method.

State-Only No.

Calculation Model Not applicable.

Condition Approval 6/6/2007

Condition: Volatile Organic Compound (VOC) emissions from ETF and ETF STU operations shall not exceed 4,000 lb/yr. [WAC 173-400-110(5)(d)]

Periodic Monitoring: Material emission estimates.

Test Method: Calculations and record-keeping.

Test Frequency: Annual.

Required Records: Records of data and calculations for the VOC emissions from ETF and ETF STU operations.

State-Only No.

Calculation Model Not applicable.

Discharge Point

P-2025E ETF

200E Area, Effluent Treatment

Requirement Citation (WAC or Order Citation): DE07NWP-003

Condition Approval

6/6/2007

Condition: Particulate matter emissions shall not exceed 1,500 lb/yr. [WAC 173-400-110(5)(d)]

Periodic Monitoring: (1) HEPA filtration of ETF stack gases,
(2) HEPA filtration of offgases from the Feed Hopper, Grout Mixer, and Discharge Chute, and
(3) Industrial filtration of dry material storage bins.

Test Method: See Required Records.

Test Frequency: Not applicable.

Required Records: Maintenance and operating records of all filtration systems.

State-Only No.

Calculation Model Not applicable.

Condition Approval

6/6/2007

Condition: All TAPs in the NOC applications and identified in Tables 1 and 2 of Order DE07NWP-003, shall not exceed ASILs. [WAC 173-460-070]

Periodic Monitoring: Waste analysis records (see Required Records).

Test Method: Not specified.

Test Frequency: Not applicable.

Required Records: (1) Laboratory or waste analysis results for TAPs identified in Tables 1 and 2 of Order DE07NWP-003, and (2) waste stream influent volumetric records.

State-Only No.

Calculation Model Not applicable.

Condition Approval

6/6/2007

Condition: All newly identified TAPs shall not exceed ASILs (with assessment of ASIL compliance). [WAC 173-460-070]

Periodic Monitoring: Assessment of ASIL compliance (see Required Records).

Test Method: Not specified.

Test Frequency: Not applicable.

Required Records: Report laboratory or waste analysis result of newly identified TAPs within 90 days of completion of analysis, and (2) waste stream influent volumetric records.

State-Only No.

Calculation Model Not applicable.

Condition Approval

6/6/2007

Condition: Emissions of ammonia from the ETF STU stack shall not exceed two pounds per hour. [WAC 173-460-080(2)(e)]

Periodic Monitoring: Ammonia emission calculations based on Grouted waste production records and material emission estimates (see Required Records).

Test Method: Not specified.

Test Frequency: Not applicable.

Required Records: Supporting data, calculation, and procedures to demonstrate grouted waste production administrative control of ammonia content (an emission factor of 5.2% shall be applied to determine ammonia emissions based upon STU brine feed concentrations of ammonium sulfate and ammonium nitrate).

State-Only No.

Calculation Model Not applicable.

Pages 1-73 to -76 intentionally left blank

(By 5/9/2007 letter from ECY to USDOE-ORP, Order DE04NWP-002 was removed following void of NOC due to discontinuity of construction over 18 months.)

Pages 1-73 to -76 intentionally left blank

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(By 5/9/2007 letter from ECY to USDOE-ORP, Order DE04NWP-002 was removed following void of NOC due to discontinuity of construction over 18 months.)

Table 1.1. List of Significant Emission Units.

Emission unit	Requirements	Description
200CC, Boiler 1	Table 1.3	80 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
225-B, Boiler 1	Table 1.3	150 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
275-E, Boiler 1	Table 1.3	80 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
272-W, Boiler 1	Table 1.3	250 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
222-S, Boilers 1 & 2	Table 1.3	200 HP fuel oil boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
283-W, Boiler 1	Table 1.3	200 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
283-E, Boiler 1	Table 1.3	200 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
234-5Z, Boilers 1, 2, & 3	Table 1.3	350 HP fuel oil boilers, subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
242-A, Boiler 1	Table 1.3	200 HP fuel oil boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
242-A, Boilers 2 & 3	Table 1.3	700 HP fuel oil boilers, subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
318, Boiler 1	Table 1.3	30 HP natural gas boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
320, Boilers 1 & 2	Table 1.3	100 HP natural gas boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
323, Boiler 1	Table 1.3	50 HP natural gas boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
324, Boilers 1 & 2	Table 1.3	300 HP natural gas boilers, subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
325, Boilers 1 & 2	Table 1.3	125 HP natural gas boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
326, Boilers 1 & 2	Table 1.3	100 HP natural gas boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
327, Boiler 1	Table 1.3	200 HP natural gas boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
328, Boiler 1	30 HP natural gas boiler permanently deactivated in May 2007 (per 07-SED-0247).	
329, Boilers 1, 2, 3 & 4	Table 1.3	50 HP natural gas boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
331, Boilers 1 & 2	Table 1.3	300 HP natural gas boilers, subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
337-B, Boilers 1 & 2	60 HP natural gas boilers permanently deactivated in May 2007 (per 07-SED-0247)	
382-A-D, Boiler 1	Table 1.3	200 HP natural gas boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
3709A, Boiler 1	Table 1.3	15 HP natural gas boiler, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115).
200E E-225BC 001	Table 1.4	500 HP or greater internal combustion engine.

Table 1.3. Emission Limits and Periodic Monitoring Requirements for Steam Generating Units.

Boiler Annex	Unit	>5mmBTU/hr input	Fuel
327	Boiler 1	Yes	natural gas
328	Boiler 1 permanently deactivated in May 2007.		
329	Boiler 1	No	natural gas
	Boiler 2	No	natural gas
	Boiler 3	No	natural gas
	Boiler 4	No	natural gas
331	Boiler 1	Yes	natural gas
	Boiler 2	Yes	natural gas
337	Boilers 1 & 2 permanently deactivated in May 2007.		
382-A-D	Boiler 1	Yes	natural gas
3709A	Boiler 1	No	natural gas

541710	Research and Development in the Engineering and Life Sciences
562210	Waste Treatment and Disposal
562910	Remediation Services
924110	Administration of Air and Water Resource and Solid Waste Management Program
999999	Unclassified Establishments.

This AOP specifically excludes facilities that do not meet the criteria for inclusion in a major source subject to the Air Operating Permit Regulation (i.e., WAC 173-401); the criteria are described in the Statement of Basis. Examples of facilities excluded at the time of AOP renewal in 2006 are the following:

- Perma-Fix Northwest (PFNW), Richland facility
- Interstate Nuclear Services laundry
- Battelle Richland North facilities
- Applied Process Engineering Laboratory
- Laser Interferometer Gravitational-Wave Observatory
- all Energy Northwest facilities unless leased to DOE as a support facility
- all Port of Benton facilities unless leased to DOE as a support facility
- US Ecology, Inc., commercial low-level radioactive waste burial site
- Kaiser Aluminum and Chemical Corporation extrusion press located in an 1100 Area Building
- AREVA NP
- Tri-City and Olympia Railroad, located in an 1100 Area Building
- PN Services
- Environmental and Molecular Science Laboratory
- Oasis Physical Therapy located at the Stevens Center
- Montessori School located at the Stevens Center
- Corporate Health Facility located at the Stevens Center
- Bulk Vitrification Testing Facility located across from Hammer in Richland.
- Non-Road Engines

- g) Does DOE control the performance of the entity?
1. Can DOE Hanford Site operations offices make decisions that affect the entity's pollution control technologies?
 2. Does the entity share products, byproducts, equipment, other property, or pollution control equipment with DOE?
 3. Does the entity share a common workforce, plant manager, security forces, corporate executive officers, payroll activities, employee benefits, health plans, retirement funds, insurance coverage, or other administrative functions?

There are a number of privatized commercial facilities, including a nuclear power plant, a research facility to study gravitational waves, and a commercial low-level radioactive waste burial site located within the boundaries of the Hanford Site. Ecology has concluded these activities are not under the common control of DOE Hanford Site operations offices, and, consequently these facilities are not part of the Hanford Site. [WAC 173-401-200(17)]

The following is provided to support the determination to exclude those facilities and activities listed in Section 2.0 of the “Standard Terms and Conditions” portion of the Hanford Site AOP. All future excluded facilities and activities will be guided by the process outlined in Section 2.0 of this Statement and current regulatory interpretative guidance and precedents.

For sites with multiple types of entities and relationships, the EPA has provided additional interpretive guidance for determining which sources are to be included as part of the major source to be addressed in an air operating permit¹. The following have been determined to not be part of the Hanford major source.

- **PermaFix Northwest, Inc., Richland Facility**

PermaFix Northwest, Inc. (PFNW), formerly Pacific EcoSolutions, Inc. (PEcoS), operates a low-level radioactive and mixed waste decontamination, super compaction, and packaging disposal facility. The share of PFWN service output provided to DOE Hanford operations is currently less than 50%. A private entity outside the Hanford Site would not be considered a “support facility” to DOE under the guidance on “common control” if the percentage of the entity’s output or service provided to DOE is less than 50%. Based on the current mode of operation, PFWN shall not be added to the Hanford Site Title V AOP.

- **Interstate Nuclear Services Laundry**

Interstate Nuclear Services (INS) provides cleaning and decontamination services for personnel protection clothing and respirator masks. INS was dependent on DOE as a

¹ EPA Guidance “Questions and Answers on the Requirements of Operating Permits Program Regulations, July 7, 1993,” and later correspondences on common control issues.

If weekly visible emission surveys for 3 months are negative, quarterly measurements will be taken for the next 6 months. After 9 months of no visible emissions, visible emission surveys will be performed only when visible emissions are observed or expected (e.g., during startup, shutdown, or periods of malfunction). Visible emission surveys during these periods will be conducted for non-radionuclide-emitting stacks according to the process described in Tier 2.

Tier 3

Maintain abatement control technology as required in Attachment 2 for that particular emission unit.

2.2 General Standards Complaint Investigations

Complaints forwarded by Ecology shall be addressed promptly and assessed for corrective action. An initial informal response shall be made to Ecology within 30 working days of the Permittee receiving the complaint. This initial response shall document preliminary investigation results and any planned or completed corrective actions. Follow-up report(s) shall be provided as directed by Ecology. The Permittee shall maintain records of complaints forwarded by Ecology.

2.3 Measures to Control Fugitive Emissions and Fugitive Dust

Construction projects with a potential to generate particulates will address fugitive emissions and fugitive dust control during pre-job planning and job safety analysis. Measures to control fugitive emissions and fugitive dust may include but are not limited to:

1. Watering
2. Use of chemical stabilizers
3. Use of physical barriers and/or physical stabilization
4. Use of vegetative stabilization
5. Clearing only limited areas to reduce dust generation
6. Covering haul vehicles
7. Minimizing track-out
8. Controlling site traffic to decrease disturbance of soil and vegetation to decrease dust generated from unnecessary vehicular travel.

2.4 RACT

Emission standards and other requirements contained in rules or regulatory orders in effect at the effective date of this permit or subsequent renewals shall be considered RACT for purposes of permit issuance or renewal. RACT determinations made subsequent to the effective date of permit issuance or renewal shall be incorporated into this permit as provided by WAC 173-401-730. [WAC 173-401-605(3)].

2.5 Recordkeeping for Boilers

DOE and the contractor shall maintain appropriate monthly records of the fuel use on each individual boiler. These data, along with the emission factors presented in Ecology Regulatory