



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

MAY 16 2016

16-ECD-0020

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

Ms. Smith:

NOTIFICATION OF ADMINISTRATIVE PERMIT AMENDMENT TO REMOVE THE 241-A AND 241-AX TANK FARM VENTILATION EXHAUSTERS FOR THE RETRIEVAL OF WASTES FROM THE HANFORD SITE AIR OPERATING PERMIT DE05NWP-002

- References:
1. WRPS letter from M.A. Lindholm to K.W. Smith, ORP, "Washington River Protection Solutions LLC Submits TOC-ENV-NOC-5252, Rev. 00, the Criteria and Toxics Air Emissions Notice of Construction for the Operation of Portable Exhausters Supporting Single-Shell Tank Waste Retrieval at the 241-A and 241-AX Tank Farms," WRPS-1600698, dated February 18, 2016.
 2. Ecology letter from J.A. Hedges to S. Olinger, ORP, Approval of Criteria and Toxic Air Emissions Notice of Construction (NOC) Application, Hanford Single-Shell Tank Waste Retrieval," dated July 31, 2007.

On February 18, 2016, Washington River Protection Solutions LLC submitted to the U.S. Department of Energy, Office of River Protection TOC-ENV-NOC-5252, "Criteria and Toxics Air Emissions Notice of Construction for the Operation of Portable Exhausters Supporting Single-Shell Tank Waste Retrieval at the 241-A and 241-AX Tank Farms" (Reference 1). The Notice of Construction proposed the concurrent operation of four portable exhausters to support waste retrieval activities in 241-A and 241-AX Tank Farms.

Upon approval order issuance for TOC-ENV-NOC-5252, DE05NWP-002 (Reference 2) ventilation exhauster system conditions will no longer apply to 241-A and 241-AX Tank Farm waste retrieval operations. Attachment 1 is the Notice of Construction Administrative Change Request. Attachment 2, the Notification of Administrative Permit Amendment, requests the removal of 241-A and 241-AX Tank Farms from the conditions in DE05NWP-002.

Ms Alexandra K. Smith
16-ECD-0020

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If you have any questions, please contact Dennis W. Bowser, Environmental Compliance Division, (509) 373-2566.



Kevin W. Smith
Manager

ECD:DWB

Attachments: (2)

cc w/attachs:

P.M. Gent, Ecology
R.A. Kaldor, MSA
E.T. Faust, RL
Administrative Record
Environmental Portal, LMSI
WRPS Correspondence

cc w/o attachs:

J. Cox, CTUIR
R.S. Skeen, CTUIR
G. Bohnee, NPT
K. Niles, Oregon Energy
J. Martell, WDOH
T.G. Beam, WRPS
J.A. Joyner, WRPS
J.A. Voogd, WRPS
R. Jim, YN

**Attachment 1
16-ECD-0020
(7 Pages)**

Notice of Construction Application



DEPARTMENT OF
ECOLOGY
State of Washington

Notice of Construction

Application

This application applies statewide for facilities under the Department of Ecology's jurisdiction. Submit this form for review of your project to construct a new or modified source of air emissions. Please refer to Ecology Forms ECY 070-410a-g, "Instructions for NOC Application," for general information about completing the application.

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

**Department of Ecology
Cashiering Unit
P.O. Box 47611
Olympia, WA 98504-7611**

For Fiscal Office Use Only:
001-NSR-216-0299-000404

Check the box for the location of your proposal. For assistance, call the contact listed below:		
	Ecology Permitting Office	Contact
<input type="checkbox"/>	Chelan, Douglas, Kittitas, Klickitat, or Okanogan County Ecology Central Regional Office – Air Quality Program	Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
<input type="checkbox"/>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla or Whitman County Ecology Eastern Regional Office – Air Quality Program	Greg Flibbert (509) 329-3452 gregory.flibbert@ecy.wa.gov
<input type="checkbox"/>	San Juan County Ecology Northwest Regional Office – Air Quality Program	David Adler (425) 649-7082 david.adler@ecy.wa.gov
<input type="checkbox"/>	For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Ecology Industrial Section – Waste 2 Resources Program Permit manager: _____	Garin Schrieve (360) 407-6916 garin.schrieve@ecy.wa.gov
<input checked="" type="checkbox"/>	For actions taken on the US Department of Energy Hanford Reservation Ecology Nuclear Waste Program	Philip Gent (509) 372-7983 philip.gent@ecy.wa.gov



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Check the box below for the fee that applies to your application.

New project or equipment:

<input type="checkbox"/>	\$1,500: Basic project initial fee covers up to 16 hours of review.
<input type="checkbox"/>	\$10,000: Complex project initial fee covers up to 106 hours of review.

Change to an existing permit or equipment:

<input checked="" type="checkbox"/>	\$200: Administrative or simple change initial fee covers up to 3 hours of review Ecology may determine your change is complex during completeness review of your application. If your project is complex, you must pay the additional \$675 before we will continue working on your application.
<input type="checkbox"/>	\$875: Complex change initial fee covers up to 10 hours of review
<input type="checkbox"/>	\$350 flat fee: Replace or alter control technology equipment under WAC 173-400-114 Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application.

Read each statement, then check the box next to it to acknowledge that you agree.

<input checked="" type="checkbox"/>	The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you \$95 per hour for the extra time.
<input checked="" type="checkbox"/>	You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested.
<input checked="" type="checkbox"/>	Submittal of this application allows Ecology staff to visit and inspect your facility.



Notice of Construction

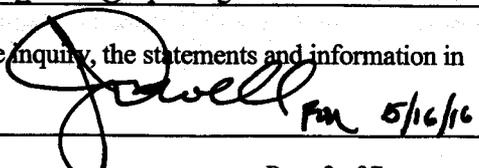
Application

Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name A and AX Tank Farm Retrieval Ventilation Exhauster Systems– Removal from DE05NWP-002
2. Facility Name United States Department of Energy, Office of River Protection
3. Facility Street Address 2440 Stevens Drive, Richland, WA 99352
4. Facility Legal Description Hanford Site, 200 West and 200 East Areas
5. Company Legal Name (if different from Facility Name)
6. Company Mailing Address (street, city, state, zip) P.O. Box 550, MSIN H6-60, Richland, WA 99352

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite) Dennis Bowser	
2. Facility Contact Mailing Address (if different than Company Mailing Address)	
3. Facility Contact Phone Number (509) 373-2566	4. Facility Contact E-mail Dennis W Bowser@orp.doe.gov
5. Billing Contact Name (who should receive billing information) Dennis Bowser	
6. Billing Contact Mailing Address (if different than Company Mailing Address)	
7. Billing Contact Phone Number (509) 373-2566	8. Billing Contact E-mail Dennis W Bowser@orp.doe.gov
9. Consultant Name (optional – if 3 rd party hired to complete application elements)	
10. Consultant Organization/Company	
11. Consultant Mailing Address (street, city, state, zip)	
12. Consultant Phone Number	13. Consultant E-mail
14. Responsible Official Name and Title (who is responsible for project policy or decision-making) Kevin W. Smith, Manager	
16. Responsible Official Phone (509) 372-2315	17. Responsible Official E-mail Kevin W Smith@orp.doe.gov
18. Responsible Official Certification and Signature I certify, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate and complete.  PM 5/16/16	



Notice of Construction

Application

1. Facility Contact Name (who will be onsite) Dennis Bowser	
2. Facility Contact Mailing Address (if different than Company Mailing Address)	
3. Facility Contact Phone Number (509) 373-2566	4. Facility Contact E-mail Dennis_W_Bowser@orp.doe.gov
5. Billing Contact Name (who should receive billing information) Dennis Bowser	
6. Billing Contact Mailing Address (if different than Company Mailing Address)	
7. Billing Contact Phone Number (509) 373-2566	8. Billing Contact E-mail Dennis_W_Bowser@orp.doe.gov
9. Consultant Name (optional – if 3 rd party hired to complete application elements)	
10. Consultant Organization/Company	
11. Consultant Mailing Address (street, city, state, zip)	
12. Consultant Phone Number	13. Consultant E-mail
Signature _____ Date _____	

Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

Please attach the following to your application.

- Written narrative describing your proposed project.
- Projected construction start and completion dates.
- Operating schedule and production rates.
- List of all major process equipment with manufacturer and maximum rated capacity.
- Process flow diagram with all emission points identified.
- Plan view site map.

- Manufacturer specification sheets for major process equipment components.
- Manufacturer specification sheets for pollution control equipment.
- Fuel specifications, including type, consumption (per hour & per year) and percent sulfur.



Notice of Construction Application

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

SEPA review is complete:

Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, EIS) with your application.

SEPA review has not been conducted:

If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.

Agency Reviewing SEPA:

If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at www.ecy.wa.gov/programs/sea/sepa/docs/echecklist.doc



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V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

If yes, please provide the following information regarding your criteria emissions in your application.

The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, TSP, VOC, and Pb)

Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)

If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? Yes No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

The names of the toxic air pollutants emitted (specified in [WAC 173-460-150¹](#))

Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)

If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70.94 RCW.

Does your project comply with all applicable standards identified? Yes No

VIII. Best Available Control Technology

Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

IX. Ambient Air Impacts Analyses

Please provide the following:

Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>



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- Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)

- Discharge point data for each point included in air impacts analyses (include only if modeling is required)
 - Exhaust height
 - Exhaust inside dimensions (ex. diameter or length and width)
 - Exhaust gas velocity or volumetric flow rate
 - Exhaust gas exit temperature
 - The volumetric flow rate
 - Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
 - Identification of the emission unit(s) discharging from the point
 - The distance from the stack to the nearest property line
 - Emission unit building height, width, and length
 - Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
 - Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? Yes No

**Attachment 2
16-ECD-0020
(2 Pages)**

**Hanford Site Air Operating Permit
Notification of Administrative Permit Amendment**

HANFORD SITE AIR OPERATING PERMIT

Notification of Administrative Permit Amendment

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of an administrative amendment described as follows.

The following changes are allowed pursuant to WAC 173-401-720(1) and WAC 173-401-720(2):

1. Correct typographical errors,
2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source,
3. Requires more frequent monitoring or reporting by the permittee;
4. Allows for a change in ownership or operational control of a source where the permitting authority determines that no other change is necessary provided that a written agreement containing the specific information of the transfer between the current and new permittee has been submitted to the permitting authority,
5. Incorporates into the chapter 401 permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program; provided that the program meets procedural requirements listed in WAC 173-401, and
6. Changes addressed in the administrative permit amendment can be implemented immediately upon submittal.

Permit Number: 00-05-006

Provide the following information pursuant to WAC 173-401-720:

Description of the Change:

Suggested change to AOP is underlined and bolded below:

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Discharge Point: 200 Area SST Categorical Waste Retrieval

Condition Approval: 2/18/2005 (DE05NWP-002)

Condition: Emission Limits

SST ventilation exhauster systems for the retrieval of wastes other than those of the 241-C, **241-A,**
and 241-AX tank farm 100 series tanks shall not exceed 1,000 ft³/min (at standard temperature and pressure).

Submittal Date of Change:

Upon approval by Washington State Department of Ecology.

Describe the emissions resulting from orders approving notice of construction applications processed under an EPA-approved program; provided that the program meets procedural requirements listed in WAC 173-401:

No change in emissions as a result of this change.

List the terms, conditions, and provisions from orders approving notice of construction applications

processed under an EPA-approved program; provided that the program meets procedural requirements listed in WAC 173-401:

No new terms and conditions as a result of this change.