



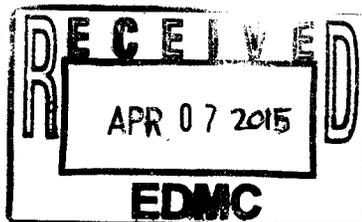
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 2, 2015

15-NWP-066

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99354



Re: Summary of March 26, 2015, Air Issues Meeting between the Department of Ecology and the United States Department of Energy - Office of River Protection

Dear Mr. ~~Smith~~: *Kevin*

This letter is a follow-up to our meeting on March 26, 2015. The meeting was held to discuss air issues mainly related to the 222-S Laboratory, but also touched on other United States Department of Energy – Office of River Protection (ORP) responsibilities at Hanford.

Kevin Smith, Tom Fletcher, and Rob Hastings attended the meeting from ORP. Jane Hedges, Ron Skinnarland, and Philip Gent attended from the Department of Ecology (Ecology).

The Department of Ecology (Ecology) covered three main points during the meeting, and we requested one distinct action.

1. Ecology has concerns about Washington River Protection Solutions (WRPS) personnel having the knowledge and experience to understand emission-related issues at complex facilities.

Personnel at 222-S Laboratory were using incorrect regulatory definitions to determine usage of equipment. The 222-S Laboratory has both a toxic emission National Emission Standard for Hazardous Air Pollutants (NESHAP) and a Radiological Air Emission License (RAEL) from the Washington Department of Health. Compliance with both the NESHAP and RAEL requirements concurrently can be complex, and it requires individuals knowledgeable with both requirements.

ORP indicated in the meeting that they are aware of the knowledge and experience issue as an organization-wide issue, and they are examining the situation and starting to formulate actions to address it. We appreciate that ORP recognizes this as an issue and is working to address it.

2. Ecology acknowledges WRPS self-reporting. WRPS has provided, and continues to provide, self-reporting of conditions in a timely manner to Ecology. This creates an easier basis to resolve self-reported conditions and reflects both WRPS and ORP's desire to operate compliant facilities.

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3. Ecology has concerns about ORP and WRPS meeting regulatory timeframes for compliance with NESHAP Subpart ZZZZ (Reciprocal Integral Combustion Engine [RICE]) for the 222-S Laboratory engine.

As part of the resolution to the self-reported condition of an emergency engine operating in a non-emergency mode, the engine in question changed status from emergency to non-emergency. The non-emergency requirements of Subpart ZZZZ will require modification to the engine within six months. It will require dedicated attention to meet compliance requirements considering the complexity of the facility with regard to nuclear facility status, importance to other ORP related activities (e.g., AY-102 retrieval, C-Farm retrieval, etc.), resource scheduling, and other issues.

During the meeting, Ecology requested ORP provide a schedule for achieving compliance with NESHAP Subpart ZZZZ for the 222-S engine. We also requested a status update of the schedule at least every other week until the engine is in compliance. Please provide, by April 10, 2015, the schedule and a point of contact at ORP to arrange for the every other week update.

We look forward to continued beneficial communications on future air regulatory issues.

Please contact Phil Gent, our Lead Air Engineer, at pgen461@ecy.wa.gov or (509) 372-7983 if you have any questions.

Sincerely,



Jane A. Hedges
 Program Manager
 Nuclear Waste Program

cc electronic:

Dennis Faulk, EPA
 Dennis Bowser, USDOE-ORP
 Tom Fletcher, USDOE-ORP
 Rob Hastings, USDOE-ORP
 Ken Niles, ODOE
 Elis Eberlein, Ecology
 Philip Gent, Ecology
 Stephanie Schleif, Ecology
 Ron Skinnarland, Ecology
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 Correspondence Control, USDOE-ORP
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 Environmental Portal

cc: Administrative Record: AIR Permits
 NWP Central Files
 NWP Reader File