



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0056053

02-RCA-048

NOV 19 2001

Mr. Allen W. Conklin, Manager
Air Emissions and Defense Waste Section
Division of Radiation Protection
Washington State, Department of Health
7171 Clearwater Lane Building 5
P. O. Box 47827
Olympia, Washington 98504

RECEIVED
JAN 03 2002
EDMC

Dear Mr. Conklin:

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FEDERAL
FACILITY COMPLIANCE AGREEMENT: QUARTERLY STATUS REPORT JULY 1
THROUGH SEPTEMBER 30, 2001

Enclosed is the National Emission Standards for Hazardous Air Pollutants (NESHAP)
quarterly status report. The status report includes NESHAP activities in progress or completed
between July 1 and September 30, 2001. Should you have any questions, please call
Astrid P. Larsen, of my staff, on (509) 372-0477.

Sincerely,

A handwritten signature in cursive script that reads "Joel Hebdon".

Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:APL

Enclosure:

cc: See page 2

Mr. Allen W. Conklin
02-RCA-048

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cc w/encl:

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ENCLOSURE

**Quarterly Status Report, July-September 2001, for National Emission Standards for
Hazardous Air Pollutants Compliance Activities**

Consisting of 8 pages Including Coversheet

Quarterly Status Report, July-September 2001, for the National Emission Standards for Hazardous Air Pollutants Compliance Activities

On February 7, 1994, the U.S. Department of Energy (DOE), Richland Operations Office (RL) and the U.S. Environmental Protection Agency (EPA), Region 10, entered into a Federal Facility Compliance Agreement (FFCA). This quarterly report provides the status of RL activities described in the FFCA Compliance Plan.

This quarterly report is divided into four sections. Section I describes activities completed during the current quarter. Section II of this report documents the status of designated stacks requiring continuous monitoring as required in Title 40, Code of Federal Regulations (CFR) Part 61, Subpart H. Section III provides the status of milestones in the FFCA Compliance Plan, and Section IV identifies the focus for the next quarter's activities.

I. ACTIVITIES COMPLETED IN CURRENT QUARTER

Project W-420 (Stack monitoring system upgrades for 296-A-25, 296-B-28, 296-C-05, 296-P-16, 296-S-22, and 296-T-18)

CH2M HILL, Hanford Group, Inc. submitted a letter and a technical justification report (RPP-8351) to US Department of Energy, Office of River Protection on September 27, 2001, and recommended a path forward that includes stack isolation by December 2005 due to reduction in mission. The report evaluated mission need for the W420 facilities, concluded there is no planned mission beyond December 31, 2005, and recommended isolation and closure of the six effected stacks. The path forward proposed a stack isolation Functions and Requirements Document, a Project Execution Plan, and other activities necessary to complete this work prior to the December 31, 2005 deadline. The Office of River Protection is considering this approach.

Amendment to 40 CFR 61 Subpart H

No news has been received from EPA on the status of the amendment to 40 CFR 61 Subpart H.

II. DESIGNATED STACK STATUS

The following table provides the status of the designated registered stacks which require continuous sampling/monitoring.

See Table 1.

III. STATUS OF FEDERAL FACILITY COMPLIANCE AGREEMENT COMPLIANCE PLAN MILESTONES

See Table 2.

IV. PLANNED OCTOBER THROUGH DECEMBER 2001 ACTIVITIES

The next quarterly report of progress for October through December 2001, will highlight progress on the following items: an informational update on Project W-420 and an update on the status of the proposed amendment to 40 CFR 61 Subpart H.

Table 1. Designated Stack Status

DESIGNATED STACKS			
	Stack Number	Facility	Status
1	291-A-1	Plutonium-Uranium Extraction Plant (PUREX)	In Compliance
2	296-B-1	B Plant	In Compliance
3	296-A-25	Tank Farms	System to be upgraded
4	296-A-42	Tank Farms	In Compliance
5	296-B-10	Waste Encapsulation and Storage Facility (WESF)	In Compliance
6	296-B-28	Tank Farms	System to be upgraded
7	296-C-5	Tank Farms	System to be upgraded
8	296-P-16	Tank Farms	System to be upgraded
9	296-S-22	Tank Farms	System to be upgraded
10	296-T-18	Tank Farms	System to be upgraded
11	296-W-4	Waste Receiving and Packaging (WRAP)	In Compliance
12	291-Z-1	Plutonium Finishing Plant (PFP)	In Compliance
13	340-NT-EX	340 Building	In Compliance
14	CDVF	Cold Vacuum Drying Facility	In Compliance
15	CSB	Canister Storage Building	In Compliance
16	EP-324-01-S	324 Building	In Compliance
17	EP-327-01-S	327 Building	In Compliance

Table 2. Status of Federal Compliance Agreement Compliance Plan Milestones

Stack Number	Designated Stacks	Comp. Y/N	Scheduled and (Actual) Completion Date
291-A-1	Plutonium-Uranium Extraction Plant (PUREX)		
	EPA, Region 10, accepted sampling system as an alternative method	Y	In Compliance (April 1994)
291-Z-1	Plutonium Finishing Plant		
	Complete flow-measurement site selection	Y	May 30, 1994 (April 29, 1994)
	Complete flow-measurement equipment upgrades (Alternate method accepted by EPA, Headquarters)	Y	May 30, 1996 (May 4, 1995)
	Document upgrades and submit to EPA a request for approval of monitoring system	Y	July 31, 1996 (In compliance September 1995)
291-B-1	B Plant		
	Complete Flow Testing	Y	February 28, 1994 (February 15, 1994)
	Document results of flow studies and submit to EPA a request for approval of monitoring system	Y	April 30, 1994 (April 30, 1994) In Compliance (June 1994)
	Shutdown of stack	N/A	August 31, 1998
291-T-1	T Plant		
	Redesignated as a minor stack	Y	In Compliance (November 1993)
340-NT-EX	340 Waste Handling Facility		
	Accept and award contract for monitoring system upgrades	Y	December 1993 (November 18, 1993)
	Complete installation of monitoring system	Y	December 1994 (December 16, 1994)
	Provide a report documenting compliance and request for EPA approval of monitoring system	Y	March 1995 (March 22, 1995)
296-A-22	242-A Evaporator		
	Submitted and received approval of alternate measurement system	Y	In Compliance (January 1994)
	Request to EPA to redesignate stack as minor stack	Y	Request Granted December 18, 1998
296-A-40	241-AP Tank Farm Exhaust		
	Functional Requirement Document (FRD) submitted to EPA for approval (Approval received from EPA, Region 10, on March 20, 1995)	Y	August 30, 1994 (August 4, 1994)

Table 2. Status of Federal Compliance Agreement Compliance Plan Milestones

Stack Number	Designated Stack	Comp Y/N	Scheduled and Actual Completion Date
	Conceptual Design Document submitted to EPA	Y	60 days after EPA, Region 10 approval of FRD May 20, 1995 (April 12, 1995)
	Upgrade Installation completion (Reassessed to Minor Stack and accepted by WDOH - September 11, 1996)	Y	December 31, 1996 (In Compliance September 11, 1996)
296-A-17	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	29 day extension granted by EPA, Region 10	Y	January 29, 1998
	29 day extension granted by EPA, Region 10	Y	February 28, 1998
	29 day extension granted by EPA, Region 10	Y	March 29, 1998
	Replacement with new unit 296-A-42 and stack shutdown	Y	March 29, 1998 (March 20, 1998)
296-A-25	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Stack reassessment completed - the initial reassessment (1) showed the stack to be a non-designated stack. However, a further study reassessed this stack (2) as a designated stack	Y	8/31/1995 (1) August 17, 1995 (2) (January 16, 1996) Designated stack
	Design Requirement Document provided to EPA	Y	October 31, 1995 (October 19, 1995)
	Design Requirement Review	Y	April 30, 1996 (March 15, 1996)
	Begin construction	Y	June 30, 1999 (May 5, 1999)
	Finish construction	N	December 31, 2005
	Provide documentation to EPA	N	April 30, 2006
296-A-27	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Stack reassessment completed	Y	October 31, 1995 (August 17, 1995) In Compliance

Table 2. Status of Federal Compliance Agreement Compliance Plan Milestones

Stack Number	Designated Stacks	Comp. Y/N	Scheduled and Actual Completion Date
296-A-29	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Stack reassessment completed	Y	October 31, 1995 (August 17, 1995) In Compliance
296-B-28	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Design Requirement Document provided to EPA	Y	October 31, 1995 (October 19, 1995)
	Design Requirement Review	Y	April 30, 1996 (March 15, 1996)
	Stack reassessment completed	Y	February 28, 1999 (January 16, 1996)
	Begin construction	Y	June 30, 1999 (May 12, 1999)
	Finish construction	N	December 31, 2005
	Provide documentation to EPA	N	April 30, 2006
296-C-5	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Design Requirement Document provided to EPA	Y	October 31, 1995 (October 19, 1995)
	Design Requirement Review	Y	April 30, 1996 (March 15, 1996)
	Stack reassessment completed	Y	December 31, 1999 (January 15, 1996)
	Begin construction	Y	June 30, 1999 (May 26, 1999)
	Finish construction	N	December 31, 2005
	Provide documentation to EPA	N	April 30, 2006
296-P-16	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Design Requirement Document provided to EPA	Y	March 1, 1995 (February 24, 1995)
	Design Requirement Review	Y	October 31, 1995 (October 19, 1995)

Table 2. Status of Federal Compliance Agreement Compliance Plan Milestones

Stack Number	Designated Stacks	Comp Y/N	Scheduled and (Actual) Completion Date
	Stack reassessment completed	Y	February 28, 1999 (January 16, 1996)
	Begin construction	Y	June 30, 1999 (June 1, 1999)
	Finish construction	N	December 31, 2005
	Provide documentation to EPA	N	April 30, 2006
296-P-23	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Stack reassessment completed	Y	August 31, 1995 (August 17, 1995) In compliance
296-P-26	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	March 31, 1995 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	29 day extension granted by EPA, Region 10	Y	January 29, 1998
	29 day extension granted by EPA, Region 10	Y	February 28, 1998
	29 day extension granted by EPA, Region 10	Y	March 28, 1998
	Replacement with new unit 296-A-42 and stack shutdown	Y	March 28, 1998 (March 20, 1998)
296-P-28	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	March 31, 1995 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Stack reassessment completed	Y	August 31, 1995 (August 17, 1995) In compliance
296-S-15	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	August 31, 1994 (August 4, 1994)
	Design Requirement Document provided to EPA	Y	October 31, 1995 (October 19, 1995)
	Design Requirement Review	Y	April 30, 1996 (March 15, 1996)
	Stack reassessment completed. Stack reassessment and accepted as minor by WDOH	Y	January 31, 1996 (January 18, 1996) (September 16, 1996) In Compliance

Table 2. Status of Federal Compliance Agreement Compliance Plan Milestones

Stack Number	Designated Stacks	Comp. Y/N	Scheduled and (Actual) Completion Date
296-S-22	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Design Requirement Document provided to EPA	Y	October 31, 1995 (October 19, 1995)
	Stack reassessment completed	Y	January 31, 1996 (January 18, 1996)
	Design Requirement Review	Y	April 30, 1996 (March 15, 1996)
	Begin construction	Y	June 30, 1999 (May 21, 1999)
	Finish construction	N	December 31, 2005
	Provide documentation to EPA	N	April 30, 2006
296-T-18	Point by point comparison with Title 40, CFR Part 61, Subpart H requirements	Y	August 31, 1994 (August 4, 1994)
	Schedule for upgrade submitted to EPA, Region 10	Y	March 1, 1995 (February 24, 1995)
	Design Requirements Document provided to EPA	Y	October 31, 1995 (October 19, 1995)
	Design Requirements review	Y	April 30, 1996 (March 15, 1996)
	Begin construction	Y	June 30, 1999 (May 19, 1999)
	Finish construction	N	December 31, 2005
	Provide documentation to EPA	N	April 30, 2006