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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

October 25, 2007

Mr. David A. Brockman, Manager  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, Washington 99352

**RECEIVED**  
OCT 29 2007  
**EDMC**

Re: Excess Emissions Notification in the Operation of Diesel Engines at the Hanford  
336 Building; Notice of Violation and Requirement for Information

Reference: Email Transmittal, *Report of a Deviation from Approval Order DE06NWP-002*,  
July 25, 2007 from Rodger Woodruff, Battelle to Oliver Wang, Ecology.

Dear Mr. Brockman:

The referenced email transmittal for the United States Department of Energy – Richland Operations Office (USDOE-RL) was provided in compliance with Condition 4.5.2 of the Standard Terms and General Conditions of the Hanford Air Operating Permit (AOP), 00-05-006, and Chapter 173-400-107 Washington Administrative Code (WAC). In the report, USDOE-RL identified installation and operation of diesel engines at the Hanford 336 Building in violation of Approval Condition 1.3.2.1.1 of Order DE06NWP-002.

Ecology has reviewed the report and met with your staff to identify information we require to ascertain the extent and consequences of violation of this permit condition. Information provided to date does encompass your self-identification of the non-compliant condition, cessation of operation and removal of non-compliant engines, and the installation and operation of compliant engines. Ecology finds that your excess emissions are not excusable under provisions of WAC 173-400-107.

Approval Order DE06NWP-002 established limitations and requirements upon your operation. Order DE06NWP-002 was issued in accord with provisions of Chapter 70.94.331(1) and 70.94.141(3) *Revised Code of Washington (RCW)*. Violation of Approval Condition 1.3.2.1.1 of Order DE06NWP-002 is a violation of an emissions limit established by Order and thus unlawful (RCW 70.94.040). This letter provides notice of violation pursuant to RCW 70.94.332.



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Pending determination of remedy, Ecology has not established an enforcement docket in this matter. In order for Ecology to complete its assessment of appropriate action in response to this deviation the following information is required:

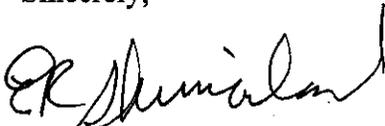
1. Your statement of the root cause of the installation and operation of non-compliant engines.
2. For the last prior compliant engine installed and operated before July 3, 2007, under Order DE06NWP-002:
  - a. Engine identification including manufacturer, model, rating (kW), and unique engine number.
  - b. A copy of the manufacturer's emissions certification.
  - c. A copy of the contract or lease agreement for the engine including conditions of engine specification and pricing.
3. For each non-compliant engine installed and operated under Order DE06NWP-002:
  - a. Engine identification including manufacturer, model, rating (kW), and unique engine number.
  - b. A copy of the manufacturer's emissions certification.
  - c. A copy of the contract or lease agreement for the engine including conditions of engine specification and pricing.
  - d. A copy of the vendor certification and fuel delivery record identifying the fuel type and sulfur content of fuel combusted by this engine.
  - e. Date of installation.
  - f. Hours of operation for each day operated.
  - g. Date of removal from the site of installation.
4. For each compliant engine installed or operated after July 19, 2007, under Order DE06NWP-002:
  - a. Engine identification including manufacturer, model, rating (kW), and unique engine number.
  - b. A copy of the manufacturer's emissions certification.
  - c. A copy of the contract or lease agreement for the engine including conditions of engine specification and pricing.

Your delivery, by mail or in person, of the above information is required within 45 days of your receipt of this letter under the provisions of Chapter 70.94.331(1), 70.94.141(4), and 70.94.332 RCW.

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If you have any questions regarding this letter or should you wish to meet prior to the commencement of any enforcement action (70.94.332 RCW), please contact Doug Hendrickson of my staff at 509-372-7983.

Sincerely,



Ron Skinnarland  
Manager, Waste Management Section  
Nuclear Waste Program

dwh/dbm

cc: Mary Jarvis, USDOE  
Cheryl Duchsherer, PNNL  
Rodger Woodruff, PNNL  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Susan Leckband, HAB  
Ken Niles, ODOE  
John Martell, WDOH  
Administrative Record: AIR Permits  
Environmental Portal