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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

October 30, 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**  
NOV 05 2007  
**EDMC**

Re: Amendment 1 to Notice of Construction Approval Order DE07NWP-002, 100B Export Water Enhancements

References: Ecology Letter, *Approval of Criteria and Toxic Air Emissions Notice of Construction (NOC) Application, 100B Export Water Enhancements*, dated June 27, 2007 <sup>0073118</sup>

Dear Mr. Brockman:

Ecology is preparing entries for the incorporation of administrative amendments to the Hanford Air Operating Permit, 00-05-006. In this preparation we found a typographical error within Condition 1.3.5.2 of Approval Order DE07NWP-002. The current condition does accurately reflect federal limitations upon fuel sulfur content in terms of parts per million but inaccurately reflects sulfur weight percent.

The following Order change is approved and issued as Amendment 1 to ORDER No. **DE07NWP-002**.

**Change 1:** Revise fuel sulfur weight percent Approval Condition as:

1.3.5.2 No greater than 0.0015 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)].

Please retain the enclosed Amendment with your initial approval. The enclosed ORDER amendment may be appealed. Appeal procedures are described in the original ORDER.

Mr. David A. Brockman  
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A copy of page 4 of DE07NWP-002, as amended, is enclosed. If you have any questions concerning the content of the document, please contact Doug Hendrickson at (509) 372-7983.

Sincerely,



Jane A. Hedges  
Program Manager  
Nuclear Waste Program

dh/dbm  
Enclosure



Doug Hendrickson, P.E.  
Lead Air Engineer  
Nuclear Waste Program



EXPIRES 06/10/2009

- cc: Laurie Kral, EPA  
Mary Jarvis, USDOE  
Tom Beam, FH  
Curt Clement, FH  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Susan Leckband, HAB  
Ken Niles, ODOE  
John Martell, WDOH 4-0-9  
Administrative Record: AIR Permits  
Environmental Portal

- 1.3.2.1.2 Installation of one engine rated no higher than 450 horsepower (HP) and two engines rated no higher than 900 HP.
- 1.3.2.2 Operational Limitation
  - 1.3.2.2.1 All recommended operation and equipment maintenance provisions supplied by the manufacturer(s) of the engine(s) will be current [40 CFR §60.4211(a)].
  - 1.3.2.2.2 Operational monitoring in accord with Approval Condition 1.5.
  - 1.3.2.2.3 Operational hours of use for each engine under this ORDER, 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)].
  - 1.3.2.2.4 Operational hours of use during emergency conditions shall not be limited provided maintenance of records of emergency use defined in Approval Condition 1.6.
- 1.3.3 Compliance with Approval Condition 1.2.5 will be demonstrated by calculation of the sum of TAP emissions from all engines authorized under this ORDER employing air pollutant emission factors of AP 42<sup>3</sup>, Table 3.3-2, for engines less than 600 HP and AP 42, Table 3.4-3<sup>4</sup>, for engines 600 HP and higher.
- 1.3.4 Compliance with Approval Condition 1.2.6 will be demonstrated by calculation of the sum of PAH TAP emissions from all engines authorized under this ORDER employing PAH air pollutant emission factors of AP 42, Table 3.3-2, for engines less than 600 HP and AP 42, Table 3.4-4, for engines 600 HP and higher. Dispersion analysis shall demonstrate that calculated emissions comply with the standard of Approval Condition 1.2.6.
- 1.3.5 Compliance with Approval Condition 1.2.7 will be demonstrated by use of fuel containing:
  - 1.3.5.1 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)].
  - 1.3.5.2 No greater than 0.0015 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)].
- 1.3.6 Compliance with Approval Condition 1.2.8 shall be demonstrated by:
  - 1.3.6.1 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)].
  - 1.3.6.2 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)].
  - 1.3.6.3 Installing and configuring the engines according to manufacturer specifications [40 CFR §60.4211(c)].
  - 1.3.6.4 Maintaining records of engine certification as detailed in Approval Condition 1.6 [40 CFR §60.4211(c)]

<sup>3</sup> AP 42, Fifth Edition, *Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources*, <http://www.epa.gov/ttn/chief/ap42/index.html>

<sup>4</sup> Table 3.4-3 of AP 42 does not estimate emissions of 1,3-Butadiene for larger engines. An emission factor of zero shall be applied to 1,3-Butadiene for engines 600 HP or larger.