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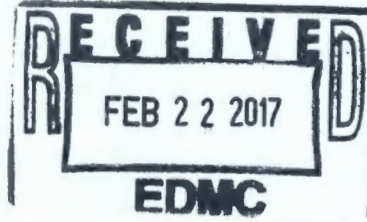
STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 16, 2017

17-NWP-015

Mr. Doug Shoop, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: A7-50  
Richland, Washington 99352



Re: Inspection Close-out Letter for Air Operating Permit (AOP) Discharge Points 1.4.10, 1.4.11 and 1.4.12 (E-225BC 001, E-225BG 001, E-4250 001, and G-3225BC 001)

Dear Mr. Shoop:

As part of continuous compliance verification, the Department of Ecology (Ecology) conducts facility inspections of units subject to the Hanford Site AOP and Approval Orders. This letter is provided to communicate the results of an inspection that was performed on November 8, 2016, of discharge points 1.4.10, 1.4.11 and 1.4.12 (E-225BC 001, E-225BG 001, E-4250 001, and G-3225BC 001) by Ecology. Compliance with applicable conditions of AOP 00-05-06 Renewal 2, Revision B, was the basis of the inspection. Records were reviewed for time periods January 1, 2015 to November 8, 2016.

The results of the inspection and compliance status are provided below along with any recommendations or action items.

**1.4.10 E-225BC 001**

- Ecology has determined that discharge point 1.4.10 E-225BC 001 was in continuous compliance for 2015 and 2016. See below for details of determination.
  - In reference to the 20% opacity permit condition, it was determined that compliance was successfully demonstrated through a review of monthly datasheets where opacity determinations were performed on a monthly basis but only required on a quarterly basis.
  - In reference to the 1,000 ppm, SO<sub>2</sub> permit condition, it was determined that compliance was successfully demonstrated by providing the amount and type of fuel burned and vendor's bill of ladings documenting fuel type and analysis.
  - During the inspection, CH2M Hill Plateau Remediation Company (CHPRC) identified 1.4.10 E-225BC 001 as being out of service and was intended to be removed from the AOP.





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However, CHPRC unwittingly identified discharge point 1.4.10 E-225BC 001 with 1.4.55 225BC which is another one of CHPRC's discharge points (that happens to have a similar naming convention). The discharge point 1.4.55 225BC is out-of-service and CHPRC has requested removal from the AOP; whereas, 1.4.10 E-225BC 001 is actually in service and functioning. The mix-up was recognized by CHPRC when Ecology inquired about the letter requesting removal of 1.4.10 E-225BC 001 from the AOP. CHPRC promptly notified Ecology and provided pictures of the engine along with all the required records for discharge point 1.4.10 E-225BC 001.

- It is recommended to provide the name of the discharge point, exactly as it appears in the AOP on engine records or data sheets to avoid and future confusion by Ecology or CHPRC as to which discharge point is in question. Alternatively, the numbers designated in AOP 00-05-06 Renewal 2, Revision B for the respective discharge points could also be used as Ecology will begin permanently reserving the numbers issued for a particular discharge point. In other words, 1.4.10 will not be re-designated with another discharge point upon future AOP revisions/renewals.
- It is also recommended when determining if visible emissions are present, not to use "N/A" when documenting no visible emissions but instead record these findings as "0%" or "no visible emissions." Ecology is also aware that CHPRC does not have any personnel certified in Method 9 which is required to make the determinations of opacity above 0%.

#### 1.4.11 E-225BG 001

- Ecology has determined that discharge point 1.4.11 E-225BG 001 was in continuous compliance for 2015 and 2016.
- In reference to the 20% opacity permit condition, it was determined that compliance was successfully demonstrated through a review of monthly datasheets where opacity determinations were performed on a monthly basis but only required on a quarterly basis. Ecology is aware that CHPRC does not have personnel that are certified in Method 9, which is required to make opacity determinations.
- In reference to the 1,000 pp, SO<sub>2</sub> permit condition, it was determined that compliance was successfully demonstrated by providing the amount and type of fuel burned and vendor's bill of ladings documenting fuel type and analysis.
- It is also recommended when determining if visible emissions are present not to use "N/A" when documenting no visible emissions but instead record these findings as "0%" or "no visible emissions." Ecology is also aware that CHPRC does not have any personnel certified in Method 9 which is required to make the determinations of opacity above 0%.

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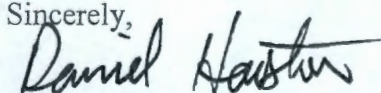
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**1.4.12 E-4250 001, G-3325BC 001**

- In letter 15-ESQ-0101 dated August 24, 2015, the U.S. Department of Energy requested removal of discharge point 1.4.12 E-4250 001, G-3325BC 001 from the AOP. During the inspection Ecology determined that the engine was disconnected from the fuel line and is electrically isolated. Ecology will remove discharge point 1.4.12 E-4250, G-3325BC 001 from future AOP revision/renewals.

Should you have any questions, please contact me at [daniel.heuston@ecy.wa.gov](mailto:daniel.heuston@ecy.wa.gov) or (509) 372-7895.

Sincerely,



Daniel Heuston, PE  
Environmental Engineer 3  
Nuclear Waste Program

cc electronic:

Donald Dossett, USEPA  
Doug Hardesty, USEPA  
Jim McAuley, USEPA  
Dennis Bowser, USDOE-ORP  
Eric Faust, USDOE-RL  
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Steve Hudson, HAB  
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Administrative Record  
NWP Central File