



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
3100 Port of Benton Blvd • Richland, WA 99354 • (509) 371-7316

RECEIVED  
OCT 16 2008  
EDMC

October 14, 2008

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

Ms. Shirley J. Olinger, Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Re: Hanford Air Operating Permit Annual Compliance Certification Report

Reference: *Hanford Site Air Operating Permit Annual Compliance Certification Report for the Period January 1, 2007 through December 31, 2007, DOE/RL-2008-24, Rev. 0, June 23, 2008.*

Dear Mr. Brockman and Ms. Olinger:

This letter transmits acceptance from the Department of Ecology of your Air Operating Permit (AOP) compliance certification (Reference). We accept it as a complete and appropriate statement of compliance of Hanford Site air emission sources regulated under Washington Administrative Code (WAC) 173-400, WAC 173-401, WAC 173-460, and WAC 246-247 for calendar year 2007.

Sixteen emission sources of the United States Department of Energy – Richland Operations (USDOE-RL) and United States Department of Energy – Office of River Protection (USDOE-ORP) were inspected based upon compliance assertions and stated methods of compliance demonstration provided under your certification. Our inspection findings are provided in Table 1 (see page 4).

We are pleased with the level of coordination and cooperation achieved regarding these inspections. All information requested was available during or promptly following the inspections. We find the facilities in compliance with existing AOP and Notice of Construction Approval Order requirements. However, an item of advice and two types of action have been developed from our review.



Mr. Brockman and Ms. Olinger  
October 14, 2008  
Page 2

The item of advice is along the line of clarification. The December 2006 Renewal of the Hanford Site AOP identified the obsolescence of multiple sources and their permits within the Statement of Basis for the Standard Terms and General Conditions. Specifically, the following were each noted to be obsolete on page 28:

- Order DE98NWP-005, Rotary Mode Core Sampling System.
- Order DE98NWP-006 as amended, Portable Exhausters for Saltwell Pumping.
- Letter Approval 7/13/1992, 200W P-296S021 001, 222-S Hot Cell Expansion.

Although we coordinated the AOP Renewal with Hanford Site personnel, we have determined that no prior or parallel communication from Ecology formally documented the withdrawal of air pollutant emission authority under these three approvals. With this letter, please be advised that these Orders are and have been withdrawn entirely.

If you wish to appeal the withdrawal of the authorization contained within these Orders, you may do so by application as described below. As presented within the AOP at this time, no further AOP amendment is required to address these withdrawals.

The first item of current action is on the part of Ecology. Our review of your operations indicates that permit authority under Order DE01NWP-001 for the Thermal Stabilization of Polycubes at the Plutonium Finishing Plant has not been exercised since February 2003. Further, we understand that you no longer have the equipment or materials to undertake work under this Order. In accordance with Condition 8.B. of Order DE01NWP-001, regarding discontinuation of activities exceeding 18 months, this Order is void and hereby withdrawn entirely.

Ecology will initiate amendment of the AOP to identify the removal of Order DE01NWP-001 from the AOP. If you wish to appeal the withdrawal of the authorization contained within Order DE01NWP-001, you may do so by application, within 30 days of receipt of this letter to:

Pollution Control Hearings Board  
P.O. Box 40903  
Olympia, Washington 98504-0903

Concurrently, copies of the application must be sent to:

Washington State Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354



Mr. Brockman and Ms. Olinger  
October 14, 2008  
Page 3

These procedures are consistent with the provisions of Chapter 43.21B of the Revised Code of Washington, and the rules and regulations adopted thereunder.

The second item of action is that of provision of clarification to your compliance certification report and your actions to address these clarifications. Table 2, below, identifies discrepancies in your statements of operational and compliance status for which we require that you provide documented amendment. Substantially each such amendment may be completed by inclusion of a statement of errata within your AOP compliance certification for the 2008 calendar year.

Your 2007 AOP compliance certification (see Reference) has been reviewed by Ecology, Washington State Department of Health, and Benton Clean Air Authority. Additional inspections and documentary review have been completed where determined necessary to verify your claims of compliance. As the permitting authority for AOP permit 00-05-006, Ecology hereby accepts all compliance certification statements within DOE/RL-2008-24, Rev. 0.

If you have any questions, please contact me at 509-372-7983.

Sincerely,



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

pll

cc: Don Dossett, EPA  
Laurie Kral, EPA  
Dennis Bowser, USDOE  
Cliff Clark, USDOE  
Mary Jarvis, USDOE  
David Lauer, BCAA  
Philip Piestrup, BNI  
Jeffry Voogd, CH2M  
Tom Beam, FFS  
Jerry Cammann, FFS

Patrick Weiher, JCI  
Rodger Woodruff, PNNL  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Susan Leckband, HAB  
Ken Niles, ODOE  
John Martell, Health  
Administrative Record: AOP  
Environmental Portal

<b>Table 1: Facilities Inspection List</b>		
NOC Permit/ FF-01 Emissions Unit	Facility Description	Inspection Results
	600 Area Inactive Asbestos Landfill	Compliant
DE07NWP-004	Waste Treatment Plant Heaters and Dehumidifiers	Compliant
DE07NWP-002	100B Export Water Emergency Diesel Engines	Compliant
EU 93	296-A-42, 241-AY/AZ TANK FARM	Compliant
EU 362	EP-326-01-S, 326 MATERIAL SCIENCE LAB	Compliant
EU 435	296-H-212, CANISTER STORAGE BLDG (CSB)	Compliant
EU 443	300 Diffuse/Fugitive Emissions	Compliant
EU 448	Vented Containers (WRAP)	Compliant
EU 472	P-Trench 31	Compliant
EU 689	100 Area Diffuse/Fugitive	Compliant
EU0486-61	AIR 06-1051 – A, Isolation and Closure of Exhaust Stacks 296-A-25, 296-B-28, 296-S-22 and 296-T-18	Compliant
EU0738-001	AIR 06-1051 – B, 244-A Primary HEPA	Compliant
EU0912-001	AIR 06-1051 – F, 244-A Annulus HEPA	Compliant
EU0922-001	AIR 06-1051 – G, 244-BX Annulus HEPA	Compliant
EU0959-001	AIR 06-1051 – H, 244-S Annulus HEPA	Compliant
EU0969-001	AIR 06-1051 – I, 244-TX Annulus HEPA	Compliant

<b>Table 2: Errata and Actions</b>		
NOC Permit/ FF-01 Emissions Unit (Certification Reference page)	Discussion	Required Action
NOC 94-07, P-296A042-001, AY and AZ Tank Farms Ventilation Upgrades (Page A-62)	Compliance status for ammonia emission limit has been reported as "continuous." Although Ecology did find that reported deviation was excusable under Chapter 173-400-107(2) Washington Administrative	Submit an erratum with your 2008 calendar year compliance certification identifying a correction to the compliance status of this unit as reported in



<b>Table 2: Errata and Actions</b>		
<b>NOC Permit/ FF-01 Emissions Unit (Certification Reference page)</b>	<b>Discussion</b>	<b>Required Action</b>
	Code (WAC), your compliance status was not continuous. You were in violation of this condition of your permit, and may have continued to exceed the permitted emissions limit until permit revision was approved on May 7, 2008	your 2007 compliance certification.
DE02NWP-002, Waste Treatment Plant (Page A-71 and A-72)	The compliance status was reported as "Not Applicable" to fuel quality and operating hours limitations for fire pump engines based upon an assertion that the engines did not complete construction during 2007. Ecology inspection on November 6, 2007, found these engines had completed installation and operations turnover. The referenced limitations were applicable during the certification period.	Submit errata with your 2008 calendar year compliance certification identifying a correction to the compliance status of these units as reported in your 2007 compliance certification.
DE05NWP-002 R2, 200 Area SST Categorical Waste Retrieval (Page A-95)	The compliance status for reporting of new toxic air pollutants (TAPs) was reported as "Intermittent" based upon a failure to report when the source was subject to Revision 1 of this Order. Unless the source has failed to submit further reports, compliance was restored upon issuance of Revision 2.	Submit an erratum with your 2008 calendar year compliance certification identifying a correction to the compliance status of this unit as reported in your 2007 compliance certification.
EU 93 296-A-42 (Page B-29):	Follow-up inspection verified notification of deviation to an annual aerosol test requirement. The compliance status should have been "intermittent."	Submit an erratum with your 2008 calendar year compliance certification identifying a correction to the compliance status of this unit as reported in your 2007 compliance certification.
EU 443 300 Area Emissions (Page B-253)	The operations status for this emission unit reported that it did not operate during the calendar year. Follow-up inspection indicated that the emission unit did operate as reported in the	Submit an erratum with your 2008 calendar year compliance certification identifying a correction to the operations status

<b>Table 2: Errata and Actions</b>		
NOC Permit/ FF-01 Emissions Unit (Certification Reference page)	Discussion	Required Action
	annual NESHAP radioactive air emissions report for CY 2007.	of this unit as reported in your 2007 compliance certification.
EU 689 100 Area Diffuse/Fugitive (Page B-429)	The operations status for this emission unit reported that it did not operate during the calendar year. Follow-up inspection indicated that the emission unit did operate, as reported in the annual NESHAP radioactive air emissions report for CY 2007.	Submit an erratum with your 2008 calendar year compliance certification identifying a correction to the operations status of this unit as reported in your 2007 compliance certification.
EU0486-61 AIR 06-1051 – A, EU0738-001 AIR 06-1051 – B, EU0912-001 AIR 06-1051 – F, EU0922-001 AIR 06-1051 – G, EU0959-001 AIR 06-1051 – H, EU0969-001 AIR 06-1051 – I (page B-510 – B-511)	The compliance status was reported as “Not Applicable” with a demonstration method cited as “No active requirements in the AOP for this certification period. This NOC was reported to be closed by 06-ESQ-135, dated September 22, 2006.” This status is incorrect for the passive vents listed in the NOC. While the point source active exhausts were closed, the passive vents continue to be subject to requirements.	<ol style="list-style-type: none"> <li>1. Submit errata with your 2008 calendar year compliance certification identifying a correction to the compliance status of these units as reported in your 2007 compliance certification.</li> <li>2. Convey change documentation to the Washington Department of Health to update NOC ID 697 to reflect operation of the passive vents only.</li> </ol>