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

JUN 26 1996

96-EAP-176

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Dear Messrs. Stohr and Conklin:

COMPLETION OF HANFORD SITE AIR OPERATING PERMIT APPLICATION COMPLIANCE
SCHEDULE MILESTONE A-10-01

The Hanford Site Air Operating Permit Application (Application) was submitted to the State of Washington Department of Ecology (Ecology) and the State of Washington Department of Health (DOH) on May 25, 1995. The Air Operating Permit Program regulations codified in the Washington Administrative Code 173-401, require air operating permit applications to include a compliance plan and schedule to correct compliance deficiencies discovered during preparation of air operating permit applications.

The Application includes the compliance plan and schedule for the Hanford Site in Section II.E.5. The compliance schedule is located in Appendix B of the Application and includes Milestone A-10-01. This milestone requires the U.S. Department of Energy, Richland Operations Office (RL) and its contractors to "Assess and correct the various air management systems and procedures to ensure all notices and reports are submitted to the appropriate air agencies in a timely manner." The completion date for this milestone was extended to June 30, 1996, by a letter from J. E. Rasmussen, RL, to A. W. Conklin, DOH, and O. S. Wang, Ecology, "Hanford Site Air Operating Permit, Appendix B Milestone A-10-01," EAP:HMR, dated December 22, 1995.

Enclosed is the response to close out Milestone A-10-01. The enclosure documents the various organizations, work practices, and processes RL and its contractors utilize to reasonably ensure compliance with applicable

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environmental requirements. The enclosure demonstrates that RL and its contractors have taken reasonable precautions to determine applicable environmental requirements, develop implementation plans, and demonstrate compliance.

Should you have any questions, please call Hector Rodriguez, of my staff, on (509) 376-6421.

Sincerely,

James E. Rasmussen

James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

EAP:HMR

Enclosure:

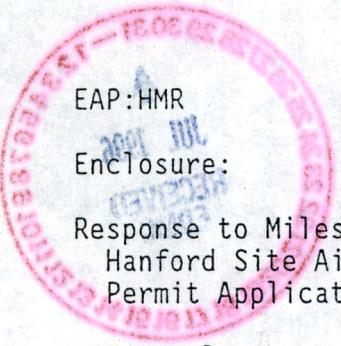
Response to Milestone A-10-01,
Hanford Site Air Operating
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Response to Milestone A-10-01, Hanford Site Air Operating Permit Application

Reference: Letter, J. E. Rasmussen, RL, to A. W. Conklin, WDOH, and O. S. Wang, Ecology, "Hanford Site Air Operating Permit, Appendix B Milestone A-10-01", EAP:HMR, dated December 22, 1995.

The Hanford Site Air Operating Permit Application (Application) was submitted to the Washington State Departments of Ecology (Ecology) and Health (WDOH) on May 25, 1995. The Air Operating Permit Program (AOP) regulations codified in the Washington Administrative Code (WAC) 173-401, require air operating permit applications to include a compliance plan and schedule to correct compliance deficiencies discovered during preparation of air operating permit applications.

The Application includes the compliance plan and schedule for the Hanford Site in Section II.E.5. The compliance schedule is located in Appendix B of the Application and includes Milestone A-10-01. This milestone requires the U.S. Department of Energy, Richland Field Operations Office (RL) and its contractors to "Assess and correct the various air management systems and procedures to ensure all notices and reports are submitted to the appropriate air agencies in a timely manner." The completion date for this milestone was extended to June 30, 1996, by the referenced memo from RL to Ecology and WDOH.

Milestone A-10-01 was included in the original Application to provide assurance to the regulators and public that RL and its contractors had or would develop systems to review projects and activities for air quality and compliance impacts. Providing management systems to assess new or modified projects and activities for permitting requirements will help ensure that human health and the environment are protected according to the provisions of state and federal clean air laws and regulations.

The following information provides the results of the review of sitewide and contractor specific air management systems and fulfills the A-10-01 Milestone.

Sitewide and RL Management Systems

The Hanford Site has several programs in place to assure compliance with environmental rules and regulations. New construction projects require a comprehensive review of all environment and operational requirements and readiness prior to startup. These requirements often include air permits that control the emissions of radionuclide, criteria, and hazardous air pollutants. These readiness reviews require that the permitting requirements and pollution control equipment for each major project are in place and operational prior to startup or operation of the activity or facility. Project personnel certify during the readiness review that all required documentation is appropriate and in place prior to startup.

Prior to initiating any work activities that may affect the quality of the environment, an environmental review of the proposed action is completed in accordance with the National Environmental Policy Act (NEPA) requirements.

This NEPA review includes an assessment of the potential air pollution impacts. In addition, Facility Effluent Monitoring Plans (FEMP) help ensure compliance with all air pollution monitoring and reporting requirements for several facilities. This program provides guidelines and recommendations for appropriate effluent monitoring equipment and monitoring methods. Not all facilities are required to prepare FEMPS. Facilities are evaluated periodically for the necessity to prepare a FEMP. Where monitoring or sampling methods are specified by regulation, the FEMPs describe the required methods.

A recent management program that is being developed by RL and several of its contractors is the development of Standards/Requirements Identification Documents (S/RIDs). These sitewide and facility-specific documents compile requirements, including environmental requirements, contained in applicable legislation, rules and regulations, U.S. Department of Energy orders, technical standards, and other directives in order to protect public health and worker safety. S/RIDs are prepared according to recommendations of the Defense Nuclear Facility Safety Board in accordance with the Atomic Energy Act of 1954.

RL's central environmental organization, Environmental Assurance, Permits, and Policy (EAP), is responsible for reviewing projects and air permit applications and other documentation for accuracy and consistency prior to submittal to air permitting agencies. The environmental coordination activities of EAP help ensure compliance with air pollution rules and regulations and assist with sitewide implementation of air pollution regulations. EAP is also the primary RL point of contact with air pollution regulatory agencies. This coordination of regulatory interactions and documentation submittals provides consistency of environmental regulation implementation.

Sitewide Contractor Systems

There are two multicontractor environmental organizations designed to provide a forum for discussion of sitewide air pollution issues, e.g., regulatory interpretation and/or implementation.

The Central Environmental Committee (CEC) is a formal association that meets regularly to discuss pertinent environmental issues affecting or potentially affecting contractor operations. Representatives from each of the prime and major sub-contractors serve on the CEC. These individuals are senior and experienced environmental professionals and managers. The CEC charter calls for the CEC to evaluate sitewide environmental issues, make sitewide environmental policy recommendations to RL, communicate and facilitate sitewide implementation of environmental policies, and facilitate sitewide interactions and mutual problem solving on specific environmental issues.

Under Title V of the Clean Air Act Amendments of 1990 (CAAA) and Washington Administrative Code 173-401, major sources of air pollution (as defined by the CAAA) are required to obtain air operating permits. The Hanford Site is a major source of several criteria pollutants and is therefore required to submit and keep current an AOP application identifying all air pollution

requirements. The Application was submitted on May 25, 1995. In order to organize, prepare, and keep current this site wide Application, an AOP steering group was formed consisting of experienced individuals from RL and all prime and major sub-contractors. This AOP steering group is another site wide association providing a forum for exchange of information and establishing consistent implementation of air pollution requirements. Compliance, permitting, monitoring, and reporting requirements for each facility and process are identified and included, as appropriate, in the AOP Application or amendments to the Application.

Contractor Specific Systems

Westinghouse Hanford Company (WHC)

The WHC air pollution control management system relies on facility or line management responsibility and accountability for environmental compliance. An environmental compliance manual defines air pollution requirements in a general way. Facility or project personnel are responsible for implementing the requirements in their respective facilities. A central support group provides assistance to facilities in interpreting regulations and implementing compliance programs. Other company-wide organizations provide forums for discussing environmental requirements and developing company-wide environmental policies.

An important vehicle for providing environmental requirements to the facilities is the WHC-CM-7-5, Environmental Compliance Manual (ECM). Section 2 of the ECM documents the air pollution requirements that apply to the Hanford Site. This section of the ECM identifies organizational responsibility for various aspects of air pollution permitting, control, monitoring, and reporting. The ECM is prepared and kept up to date by subject matter experts in a central support group. This central support group is the Environmental Services (ES) organization and is described below. These individuals also provide day-to-day support to the facilities for regulatory interpretations and regulatory interactions.

Another document that facilities and programs utilize to identify environmental requirements is the S/RID. This is a facility specific document.

Several central organizations provide environmental compliance support. These organizations assist facility management with identification of environmental requirements and coordination of compliance systems.

The ES organization provides environmental requirements subject matter experts to assist facility management to determine environmental requirements and maintain compliance. Facilities are encouraged to contact ES to evaluate new projects or activities to ascertain environmental requirements, including Clean Air Act permitting requirements. When it is determined that prior approval from an air pollution control agency is necessary, ES also provides a centralized capability for permit preparation and negotiation services. RL and WHC have previously agreed on a policy to be used when dealing with environmental regulatory agencies. This agreement also states that the WHC

communication with regulatory agencies will be coordinated by ES. The protocol for regulatory interactions has also been discussed with various project personnel through the Environmental Center of Expertise, discussed later. ES utilizes the agreement as a basis for all regulatory interactions. This organization also provides support to facility management for facility self-assessments. The self-assessments program periodically reviews facility compliance with air pollution requirements, including monitoring and reporting requirements.

The Facility Evaluation Board is another central organization staffed with experienced environmental, safety, and health professionals. The function of this organization is to conduct periodic evaluations of facility compliance with environmental requirements.

Another association of WHC/ICF Kaiser Hanford Company (ICF KH) personnel with environmental responsibilities is the Environmental Compliance Officer (ECO) committee. Each major facility or program within WHC/ICF KH has appointed an ECO to provide environmental focal points at the facility level. The ECO's provide environmental expertise and guidance on facility specific environmental issues and help coordinate environmental compliance activities in the facility, including air pollution control. The ECO committee meets to share information to, in part, gain efficiencies through shared information and experiences, keep current on environmental issues facing WHC/ICF KH, and develop consistent and unified responses to regulatory initiatives.

Another WHC/ICF KH organization chartered to determine effective compliance strategies for environmental requirements that affect more than a single facility is the Environmental Center of Expertise (COE). The COE has four functions; identify, interpret, influence, and develop consistent and coordinated implementation plans for environmental requirements. The COE is a decision-making body, making WHC policy decisions and providing recommendations to the CEC for site-wide consideration.

WHC participates in the CEC and the AOP Steering Group described above, with the attendant benefits.

ICF KH

The ICF KH system is based on a philosophy of line management responsibility and accountability for compliance with environmental requirements. This philosophy extends to activities being performed by sub-contractors, by including in those contracts, where practical, provisions to ensure compliance with air regulatory requirements. Consistency in implementation is achieved by providing a centralized program which establishes the policy, plans, procedures and other standards for compliance. This is supplemented by a system of self-assessments, management assessments, and independent assessments to determine if the program is comprehensive and is being effectively implemented. This management system relies on the ability of line management to recognize the need for environmental review of actions, upon the knowledge and experience of environmental professionals to identify applicable environmental requirements, and upon the establishment of compliance systems

and processes to avoid errors and omissions. The following paragraphs describe how the elements of the ICF KH program fit together.

ICF KH has environmental coordinators (ECs) that represent each division with significant environmental obligations. One of the ECs purposes is to help integrate environmental requirements to the line organizations. ECs play an important role in the management of air emissions. When they receive knowledge of a project that may require a new source review, they help to coordinate that effort. Most of the ECs received training on the new source review process in April 1996. Most have also received training on classifying emission unit/activities under WAC 173-401. These knowledgeable, trained professionals are the first line of defense to avoid compliance problems and to see that notices and reports are completed and submitted. (See ICF KH procedure ENV 1A, Environmental Compliance Officer, Coordinators, and Committee.)

Environmental support for compliance is provided through the identification of a single point of contact for ICF KH on environmental issues. This ECO is supported by a staff of subject matter experts who interact with other site experts. The ECO chairs an environmental committee which is comprised of ECs and the staff subject matter experts. The interaction of these personnel provides for information sharing which promotes consistency in meeting requirements and stimulates an increase in knowledge and skill for the individuals involved. These professionals help identify and implement the company-wide systems that are used to remain in compliance with requirements.

ICF KH procedure, ENV 6, Airborne Effluents, documents the requirements for the management of air pollution control activities and emission reporting (e.g., WAC 173-400 and WAC 173-401). The ECO acts as an ICF KH single point of contact to coordinate the various air pollution control requirements identified in ENV 6.

ICF KH also participates in the CEC and the AOP Steering Group described above, with the attendant benefits.

Bechtel Hanford Incorporated (BHI)

BHI employs air pollution management systems similar to the WHC and ICF KH systems. The management system relies on facility or line management responsibility and accountability for environmental compliance. The BHI-EE-02 *Environmental Requirements Manual* provides facilities and projects with documentation of the requirements. A central support group, Regulatory Support, provides assistance to field organizations to identify, interpret, and implement environmental requirements.

Section 8 of the Environmental Requirements Manual identifies the air pollution requirements potentially applicable to BHI activities. This section of the manual is maintained by Regulatory Support. Regulatory Support also provides interpretive and regulatory interface assistance to field organizations.

Project management is required to contact Regulatory Support when planning new projects with the potential to emit regulated pollutants. The environmental requirements are reviewed and Environmental Checklists are prepared identifying the requirements. Air permitting requirements are usually identified during preparation of the Environmental Checklists.

BHI also performs environmental audits of the projects and facilities to verify compliance with environmental requirements. The audits provide assurance that environmental requirements are being effectively implemented in the field.

BHI also participates in the CEC and the AOP Steering Group described above, with the attendant benefits.

Pacific Northwest National Laboratory (PNNL)

PNNL project managers complete preparation and preliminary risk assessment (PPRA) forms. The PPRA forms are a tool to assist project and line managers in determining and preparing the necessary information to address environmental, safety, and health concerns on proposals. PPRA forms are reviewed by line management. Line management has the responsibility and accountability to ensure compliance with the applicable environmental requirements. The Environmental Compliance Department provides line management with subject matter experts to help make these determinations. An Environment, Safety and Health Directorate representative or a division staff member, on request, reviews and approves the PPRA forms.

Environment, Safety and Health Directorate representatives review facility modification permits and engineering change notices to ensure that all required notices and reports are submitted to the appropriate regulatory agencies in a timely manner.

The processes for completing PPRA forms, facility modification permits, and engineering change notices are documented in PNNL internal procedure manuals.

In addition, PNNL has an internal guidance manual which helps project and line managers identify environmental regulatory requirements (PNL-MA-08). This manual discusses the responsibilities, emission limits, facility emission control levels, notification requirements, sampling and monitoring requirements, and the emission control requirements. Roles and responsibilities for each organization are outlined in the guidance manual. The responsibilities extend to high level managers, environmental compliance organizations, and facility management organizations.

In 1996, the Environmental Compliance Department established an environmental compliance representative (ECR) program to provide quality environmental compliance technical resources directly to the line and facility managers to ensure compliance with environmental regulatory requirements. The ECRs responsibilities include providing senior-level technical support on environmental requirements, identifying environmental compliance issues, conducting self-assessments, analyze results of audits, carrying out division National Environmental Policy Act responsibilities, and coordinating technical service requests. The ECRs also serve as a facility point of contact for

compliance projects, conduct analysis of regulatory/policy requirements to influence implementation, improve management systems, and participate in PNNL and site-wide committees.

PNNL also participates in the CEC and the AOP Steering Group described in the "Sitewide Contractor Systems" section of this enclosure.