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AOP Renewal 1, Rev. B

Statement of Basis

For
Attachment 2:
Department of Health
Hanford Site License FF-01

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1.0 EMISSION STANDARDS

Radioactive air emission standards for the State of Washington are contained in WAC 173-480-040, 173-480-050, 173-480-060 and in 40 CFR Part 61, Subparts H. In accordance with WAC 173-480-050 Health shall enforce the most stringent standard in effect.

Under WAC 246-247-040(5), the department may set limits on emission rates for specific radionuclides for specific emission units and/or set requirements and limitations on the operation of emission unit(s) as specified in this license. Health establishes emission limits in Notice of Construction (NOC) approvals and the FF-01 License.

All new construction and significant modifications of emission units from August 10, 1988 until the termination of this license, shall utilize BARCT per WAC 246-247-040(3).

All existing emission units and insignificant modifications shall utilize ALARACT.
[WAC 246-247-040(4)]

2.0 MONITORING, TESTING, QUALITY ASSURANCE, REPORTING AND RECORD KEEPING

Emission units with a potential-to-emit less than 0.1 mrem/yr TEDE to the MEI may, use periodic confirmatory monitoring methods approved by the department under WAC 246-247-075(3).

WAC 246-247-075(11) requires the licensee to address accidental releases when planning for any new construction or significant modification of the emission unit if the probability of occurrence during the expected life of the emission unit is greater than one percent.

2.1 REQUIREMENTS FOR DIFFUSE OR FUGITIVE SOURCES IN TABLE 2.1

Section 5 of Attachment 2 describes the requirements for monitoring and reporting of diffuse or fugitive source emissions. The ambient air monitoring conducted at the Hanford Site has been accepted by the department as the method for demonstrating compliance to emissions limits for diffuse and fugitive sources. Those sources with Emission Unit specific conditions and limitations within the FF-01 License must be monitored and meet the applicable quality assurance and analysis requirements. All required ambient air monitors shall be identified along with their data measurements in the annual Radionuclide Air Emissions Report.

Quality Assurance and Analysis

All required ambient air samples collected and analyzed must be compatible with the quality assurance requirements of national standards such as NQA-1, EPA QA/R-5, and Method 114 as applicable. Near-facility ambient air samples from individual stations must be composited at a frequency no greater than 6 months.

Modifications to the Diffuse and Fugitive Environmental Monitoring

Prior to making modifications (i.e., moving, or removing air sample locations, or changing the sampling period) to the accepted periodic confirmatory measurement (for minor diffuse and fugitive sources) and continuous measurement (for major diffuse and fugitive sources) the Department of Health, Air Emissions and Defense Waste Section shall approve a written request for the modifications. The request for modification may take the form of an email or formal letter. Analysis of other media samples will be conducted at labs with the appropriate quality assurance programs in-place.

2.2 COMPLIANCE ASSURANCE MONITORING FOR SOURCES DISCOVERED ON SITE

In the course of Hanford's 50-year history radioactive waste products may have been disposed of by means not allowed by today's standards. These disposal areas represent potential diffuse or passively ventilated point sources of radioactive airborne emissions. The license describes actions that must be taken upon the licensee discovering any category of diffuse or passively ventilated point sources. These actions include a means to establish methods for determining compliance assurance.

Categories of emission units or other specific emission units not identified in existing Tables, will meet the requirements for periodic confirmatory monitoring, recordkeeping, and reporting found in Attachment 2. The annual Radionuclide Air Emissions Report for the Hanford Site satisfies the reporting requirements.

3.0 EMISSION UNIT IDENTIFICATION DESCRIPTIONS USED IN ATTACHMENT 2

The principle identifier used in Attachment 2 of the Air Operation Permit is the Emission Unit ID number. This number is assigned to an emission unit when registered with the department. In addition to the Emission Unit ID number the Air Emissions Inventory (AEI) number is also used as an identifier. This unique identifier was established for use in the Hanford Air Operating Permit. It is based upon an alphanumeric code description indicating key information concerning the operational area code, a category code, a building identifier, and type of emission point identifier code.

Secondary emission unit identifications were used in the permit for familiarity with the identification such as the commonly used regulatory identification.

For facility operator's ease of use, a plant name or tank farm was listed with the emission unit identifiers.

In Attachment 2, Health used up to a four digit Emission Unit ID in small font under the heading text. This number is created from the database Health uses to track and generate the emission unit requirements for each emission unit.

An example of the heading used in Attachment 2 would be as follows:

Emission Unit ID: 393.....*Health's database tracking number*
200W P-291Z001*The AEI number*
291-Z-1*The regulatory ID*
PLUTONIUM FINISHING PLANT (Z PLANT)... *The associated building or tank farm*

AEI number representation:

200W Operational area code
P Process emission point
291Z Building number
001 Emission Unit ID number

NOTE: The original process of generating an AEI number is listed in the original AOP application, Chapter 1, General Information and is the responsibility of the permittee to maintain and assign these numbers to emission units.

4.0 ALARACT AGREEMENTS

The following ALARACT Agreements describe the approved methods for compliance to ALARACT set forth in Attachment 2 for the following approved routine activities.

ALARACT Number	ALARACT Agreement Title
1	TANK FARM ALARACT DEMONSTRATION FOR RISER PREPARATION/OPENING
2	TANK FARM ALARACT DEMONSTRATION FOR INSTALLATION/OPERATION/REMOVAL OF PUSH MODE CORE SAMPLING EQUIPMENT
3	TANK FARM ALARACT DEMONSTRATION FOR INSTALLATION/OPERATION/REMOVAL OF AUGER SAMPLING EQUIPMENT
4	TANK FARM ALARACT DEMONSTRATION FOR PACKAGING AND TRANSPORTATION OF WASTE
5	TANK FARM ALARACT DEMONSTRATION SOIL EXCAVATION (using hand tools)
6	TANK FARM ALARACT DEMONSTRATION FOR PIT ACCESS
7	TANK FARM ALARACT DEMONSTRATION FOR TANK WASTE GRAB SAMPLING
8	TANK FARM ALARACT DEMONSTRATION FOR VAPOR SAMPLING
10	TANK FARM ALARACT DEMONSTRATION FOR WATER LANCING
11	TANK FARM ALARACT DEMONSTRATION FOR WASTE TRANSFERS

ALARACT Number	ALARACT Agreement Title
12	TANK FARM ALARACT DEMONSTRATION FOR PACKAGING AND TRANSPORTATION OF EQUIPMENT & VEHICLES
13	TANK FARM ALARACT DEMONSTRATION FOR INSTALLATION, OPERATION, AND REMOVAL OF TANK EQUIPMENT
14	TANK FARM ALARACT DEMONSTRATION FOR PIT WORK. This ALARACT demonstration applies to all pits except 241-ER-152, 241-S-151, 241-UX-154, 241-TX-154, 244-CR Vault DCRT, 244-A Lift Station DCRT, and 244-TX DCRT.
15	TANK FARM ALARACT DEMONSTRATION FOR SIZE REDUCTION OF WASTE EQUIPMENT FOR DISPOSAL
16	TANK FARM ALARACT DEMONSTRATION FOR WORK ON POTENTIALLY CONTAMINATED VENTILATION SYSTEM COMPONENTS
18	ENVIRONMENTAL RESTORATION PROGRAM ALARACT DEMONSTRATION FOR DRILLING
26	DISPOSAL BY BURNING OF POTENTIALLY CONTAMINATED TUMBLEWEEDS
28	SHUTDOWN OF STACK SYSTEM(s) (Maintenance and incidental)
29	242-A EVAPORATOR MAINTENANCE FACILITY SHUTDOWNS
30	TANK FARM ALARACT DEMONSTRATION FOR STACK EXTENSION AND PASSIVE EMISSION POINT VENTURI

5.0 OBSOLETE EMISSION UNITS

EU ID	Emission Unit Name	Date Obsolete
60	296-T-12	2/2/2006
61	296-T-11	2/2/2006
95	296-P-41	10/25/2002
144	296-P-33	5/23/2006
167	Cross-site transfer line	2/14/2003
184	RCF-2-EX	7/5/2006
185	ER311	2/14/2003
195	309-PRTR-001	4/18/2002
197	305 B Building	7/20/2006
211	296-A-13	10/25/2002
221	296-A-17	10/25/2002
222	296-A-25	8/6/2004
253	296-P-34	5/23/2006
307	EP-3020-01-S	12/28/2004
329	296-U-11	10/25/2002
336	296-S-2	3/3/2006
342	EP-331G-01-S	3/21/2003
343	EP-331G-02-S	3/21/2003
344	241-UX-154 Diversion Box	8/10/2004
348	306 W-03-V	12/28/2004
356	EP-320-03-S	7/21/2004
392	296-Z-10	3/3/2006
419	EP-3720-01-S	7/21/2004
456	Tank Farm Restoration and Safe Storage	12/31/2002
479	Portable Exhauster	6/4/2002
480	Soil Characterization Using Cone Penetrometer	10/19/2002
481	ETF Load-In Station Filter Skid	1/15/2004
482	Hexone Tanks	5/24/2002
483	By-Pass of 244-U DCRT	11/19/2002
484	Borehole 41-09-39	2/14/2003
488	Isolation of Valve Box#11 Outside 324 Facility	2/14/2003
490	Portable Exhauster on Pit 244-TX DCRT	8/10/2004
492	241-TX-154 Diversion Box	8/10/2004
493	Tank Farm 241-S-151 Diversion Box	8/10/2004
497	244-CR-VAULT activities	8/6/2004
560	Decontamination Trailer	8/6/2004
1180	EP-331-02-S	12/30/2002

6.0 OBSOLETE APPROVALS

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
50	327	Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping	9/22/2005	AIR 02-1020
	455	Interim stabilization activities associated with removal of remaining pumpable liquids present in the 244-AR facility	8/6/2004	AIR 02-1108
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
56	62	241-SY-101 Tank Mixer Pump Replacement	11/19/2002	AIR 95-203
	358	241-SY-101 Crust Growth Near Term Mitigation	11/19/2002	Shortform
57	567	241-S-102 Installation and Operation of Waste Retrieval Systems	7/5/2006	AIR 04-503
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
	550	Installation and Operation of Waste Retrieval Systems in Single-Shell Tank (SST) 241-S-112	7/5/2006	AIR 06-109
	327	Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping	9/22/2005	AIR 02-1020
58	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
	327	Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping	9/22/2005	AIR 02-1020
	455	Interim stabilization activities associated with removal of remaining pumpable liquids present in the 244-AR facility	8/6/2004	AIR 02-1108
	567	241-S-102 Installation and Operation of Waste Retrieval Systems	7/5/2006	AIR 04-503
62	451	Use of Portable Tanks and Revised Source Term Description at Waste Sampling and Characterization Facility (WSCF)	7/5/2006	AIR 02-1102
63	451	Use of Portable Tanks and Revised Source Term Description at Waste Sampling and Characterization Facility (WSCF)	7/5/2006	AIR 02-1102
64	423	Saltwell Pumping Tanks 241-SX-101, 241-SX-102, 241-SX-103, and 241-SX-105	6/14/2006	AIR 02-1248
	667	Saltwell Pumping Tanks 241-SX-101, 241-SX-102, 241-SX-103, 241-SX-105, and 241-SX-106	6/14/2006	AIR 06-631

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	242	Rotary Mode Core Sampling (RMCS) Systems at 241-SX	9/22/2005	AIR 02-1237
	263	241-SX-104 Saltwell Pumping, Phase I	11/19/2002	NOC
	283	Saltwell Pumping of tank 241-SX-106	12/31/2002	RTAM
89	393	Isolation of Exhauster 296-P-17 from Tank 105-A in the 241-A Tank Farm	11/19/2002	NOC Revision
93	290	241-AY and 241-AZ Ventilation Upgrades	7/5/2006	AIR 02-1239
	296	Installation and Operation of Waste Retrieval Systems in Tanks 241-AZ-101 and 241-AZ-102	7/26/2005	AIR 02-503
	624	Installation and Operation of Waste Retrieval Systems in Tanks 241-AZ-101, 241-AZ-102, 241-AY-101, and 241-AY-102.	7/5/2006	AIR 05-708
134	567	241-S-102 Installation and Operation of Waste Retrieval Systems	7/5/2006	AIR 04-503
142	284	Operation of the 242-A Evaporator emission unit 296-A-22	7/5/2006	AIR 04-812
144	327	Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping	9/22/2005	AIR 02-1020
	607	Operation of Rotary Mode Core Sampling Systems Three and Four.	9/22/2005	AIR 04-904
145	343	Use of a portable exhauster at 244-AR Vault	12/20/2002	Revision Form
146	211	200 Area Effluent Treatment Facility (ETF) and Load-In Station, and Liquid Effluent Retention Facility (LERF) (Emission Point: 296-E-1)	12/31/2002	Revision Form
	562	Operation of the Liquid Effluent Retention Facility and the 200 Area Effluent Treatment Facility	7/5/2006	AIR 04-101
147	211	200 Area Effluent Treatment Facility (ETF) and Load-In Station, and Liquid Effluent Retention Facility (LERF) (Emission Point: 296-E-1)	12/31/2002	Revision Form
	562	Operation of the Liquid Effluent Retention Facility and the 200 Area Effluent Treatment Facility	7/5/2006	AIR 04-101
148	562	Operation of the Liquid Effluent Retention Facility and the 200 Area Effluent Treatment Facility	7/5/2006	AIR 04-101

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	211	200 Area Effluent Treatment Facility (ETF) and Load-In Station, and Liquid Effluent Retention Facility (LERF) (Emission Point: 296-E-1)	12/31/2002	Revision Form
165	120	S-Farm removal of duct work and associated exhausters	10/15/2002	AIR 95-1004
	339	Stack Monitoring System Upgrades (Project W-420)	9/22/2005	AIR 02-1235
166	339	Stack Monitoring System Upgrades (Project W-420)	9/22/2005	AIR 02-1235
174	468	241-AZ Tank Farm Annulus Exhauster Operation	7/5/2006	AIR 01-805
175	131	Removal of HEPA Filtration in the 318 Building Building 318 Modification and stack relocation Installation of Single Stage HEPA Filter for the Calibration and Development Activities in the Radiological Calibrations Laboratory (318 Building)	7/24/2001	RTAM
	251		12/23/2002	Shortform
	532		7/5/2006	AIR 03-1204
184	490	Operation of the Radiological Counting Facility	7/5/2006	AIR 05-206
185	412	Installation and use of a new emissions unit for the 241-ER-311 Catch Tank.	11/19/2002	Shortform
190	24	105-KE Basin Fuel Removal	2/18/2004	AIR 04-105
193	23	Construction and operation of the Waste Receiving and Processing (WRAP) Facility	7/5/2006	AIR 02-703
195	291	Decontamination and Stabilization Activities For 309 Plutonium Recycle Test Reactor	3/27/2002	NOC Revision
197	319	Operation of the Dangerous and Radioactive Mixed Waste Storage Facility (305-B)	5/25/2006	AIR 02-1202
203	550	Installation and Operation of Waste Retrieval Systems in Single-Shell Tank (SST) 241-S-112.	7/5/2006	AIR 06-109
204				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	421	Installation and operation of Waste Retrieval System in Tanks 241-AP-102 and 241-AP-104	7/5/2006	AIR 03-1105
208	339	Stack Monitoring System Upgrades (Project W-420)	9/22/2005	AIR 02-1235
213	45	244-CR Vault Double-Contained Receiver Tank	12/31/2002	AIR 94-913
	339	Stack Monitoring System Upgrades (Project W-420)	9/22/2005	AIR 02-1235
217	484	241-AY-101 Annulus Primary Tank Wall Cleaning Activities	11/19/2002	AIR 01-1108
218	488	241-AY-102 Annulus Primary Tank Wall Cleaning Activities	3/11/2002	Cancelled
224	329	Basin Drain System Mitigation Activities at the 105 K East and 105 K West Basins	1/28/2002	AIR 98-1006
227	38	Installation of a small mixer pump to support routine pH adjustment in Tank 107-AN.	11/19/2002	RTAM
	449	Installation and Operation of a Waste Retrieval System in Tanks 241-AN-101,102,103, 104, 105, 106 and 107.	7/5/2006	AIR 04-206
234	339	Stack Monitoring System Upgrades (Project W-420)	9/22/2005	AIR 02-1235
236	310	241-C-106 Tank Sluicing, Phase II	11/25/2002	AIR 98-1002
253	327	Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping	9/22/2005	AIR 02-1020
	607	Operation of Rotary Mode Core Sampling Systems Three and Four.	9/22/2005	AIR 04-904
254	10	222-S Lab Hot Cell Expansion	7/5/2006	AIR 02-1211
284	429	Use of an ultra high pressure water lance to install saltwell pumping equipment in Tank 241-BY-105	11/19/2002	AIR 00-207
301	211	200 Area Effluent Treatment Facility (ETF) and Load-In Station, and Liquid Effluent Retention Facility (LERF) (Emission Point: 296-E-1)	12/31/2002	Revision Form

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	562	Operation of the Liquid Effluent Retention Facility and the 200 Area Effluent Treatment Facility	7/5/2006	AIR 04-101
307				
	248	Environmental Molecular Sciences Laboratory (EMSL) Uranyl nitrate hexahydrate project	12/5/2001	Shortform
314				
	610	Consolidated T Plant Operations	7/5/2006	AIR 06-104
	445	Storage in T Plant Complex of Sludge from K Basins	5/16/2005	AIR 03-1208
	499	T Plant Complex Fuel Removal Project	5/16/2005	AIR 01-1010
	500	Entering and Characterizing of the 224-T Facility Process Cells	5/16/2005	AIR 02-704
315				
	164	T Plant Complex Secondary Containment and Leak Detection Upgrades	7/5/2006	AIR 02-1214
332				
	413	REDOX Plutonium Loadout Hood Stabilization	8/27/2002	NOC Revision
336				
	413	REDOX Plutonium Loadout Hood Stabilization	8/27/2002	NOC Revision
340				
	249	Waste Encapsulation and Storage Facility (WESF) K-3 Duct Characterization	6/11/2002	NOC Revision
	259	Waste Encapsulation and Storage Facility (WESF) Liquid Low Level Radioactive Liquid Removal from Tank 100.	7/5/2006	AIR 02-1218
342				
	252	Registration of Existing Stacks at the 331-G Building	3/10/2003	AIR 02-1217
343				
	252	Registration of Existing Stacks at the 331-G Building	3/10/2003	AIR 02-1217
344				
	401	Tank Farm 241-UX-154 Diversion Box	8/10/2004	AIR 02-1242
348				
	233	X-Ray and Low Level Waste Repackaging in the 306W Building	12/28/2004	AIR 02-1216
360				
	113	Cleanout of B-Cell in the 324 Building	2/25/2002	AIR 95-903
	469	Deactivation Activities at the 324 Building	2/25/2002	AIR 01-608
361				
	447	I-131 Medical Isotope Research in the Radiochemical Processing Laboratory (325 Building)	12/10/2002	AIR 02-102
	491	Medical Isotope Research Using Th-232 in the Radiochemical Processing Laboratory (325 Building)	12/10/2002	AIR 02-206

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	294	Modification to the annual possession quantity of the 325 Building Special Nuclear Materials Disposition and Low-Level Waste Vitrification Research Programs (Pu-238)	12/10/2002	AIR 98-807
	302	325 Building Hazardous Waste Treatment Unit (HWTU)	12/10/2002	AIR 02-809
	430	Tritium Target Qualification Program Radiochemical Processing Laboratory 325 Building, 300 Area	12/10/2002	AIR 02-808
	127	Removal of 3rd Stage HEPA Filter, 325 Building	7/24/2001	RTAM
	552	Conducting General Laboratory Processes Research Activities in the 325 Building	7/5/2006	AIR 04-209
	253	Transfer Strontium-90 from the 324 Building to the 325 Building	12/10/2002	Shortform
362				
	495	Research at the 326 Facility	7/5/2006	AIR 01-607
366				
	584	Operation of Research Activities Conducted in the Chemical Sciences Laboratory (329 Building)	7/5/2006	AIR 04-407
	64	329 Building, Chemical Sciences Laboratory	8/29/2001	AIR 95-205
	494	Research at the 329 Facility	7/20/2004	AIR 01-1006
384				
	417	Reactivation of PUREX Storage Tunnel Number 2	7/5/2006	AIR 02-1221
386				
	563	Decontamination for Transition of the 241-Z Liquid Waste Treatment Facility to Demolition	4/3/2006	AIR 03-1109
387				
	11	Plutonium Finishing Plant Low-Level Waste Treatment Facility	12/30/2004	AIR 02-1212
	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
389				
	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
	450	Plutonium Finishing Plant Stabilization and Packaging Equipment	12/30/2004	AIR 04-202
	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
390				
	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
	450	Plutonium Finishing Plant Stabilization and Packaging Equipment	12/30/2004	AIR 04-202
	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
391				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	553	Transition of the 232-Z Contaminated Waste Recovery Process Facility at the Plutonium Finishing Plant	8/17/2004	AIR 03-902
393	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
	374	Construction, Installation, Operation, and Removal of a Vertical Calciner to Stabilize Plutonium at PFP.	12/30/2004	AIR 01-710
	432	Plutonium Finishing Plant (PFP) Cementation process (ALARACT)	12/2/2002	AIR 00-302
	443	Magnesium Hydroxide Precipitation Process at the Plutonium Finishing Plant	12/30/2004	AIR 03-1207
	124	Ductwork and Process Piping Remediation in Buildings 234-5Z & 291-Z (PFP)	12/30/2004	AIR 02-1213
	170	Plutonium Finishing Plant Duct Work and Process Piping Remediation	9/6/2002	RTAM
	209	Disposition of Select Plutonium-Bearing Alloys at the Plutonium Finishing Plant (PFP)	12/30/2004	AIR 03-104
395	246	FFTF Ion Exchange Resin Columns Changeout	11/29/2002	AIR 97-1203
398	65	Construction and Operation of Sodium Storage Facility	5/7/2006	AIR 02-1101
402	235	B Plant Modification of the Ventilation System (Emission Point: 296-B-1)	7/5/2006	AIR 03-1216
404	235	B Plant Modification of the Ventilation System (Emission Point: 296-B-1)	7/5/2006	AIR 03-1216
412	143	HEPA Filter Bank Removal in the 331 Building	2/14/2002	RTAM
	254	Life Sciences Laboratory-1 (331 Building)	11/23/2004	AIR 02-207
	609	Life Sciences Laboratory-1 (331 Building)	7/5/2006	AIR 04-1103
423	228	340-A Building Tank Sludge Cleanout	2/14/2005	AIR 03-1203
	589	Operation of the 340 Waste Storage	7/5/2006	AIR 05-114
435	289	Canister Storage Building, Building 212-H	7/5/2006	AIR 02-713
436	229	Construction and Operation of the Cold Vacuum Drying Facility (CVDF)	7/5/2006	AIR 01-1206
438	8	219-S to 204-AR Truck Transfers	8/6/2004	AIR 03-1202
443				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	485	Demolition of 303-K Storage Facility	8/15/2002	AIR 01-1014
	546	300 Area Excavation Activities	7/5/2006	AIR 02-1225
	437	Removal of a Section of Concrete from the 384 Powerhouse Bunker Tanks	10/31/2003	AIR 02-515
447	469	Deactivation Activities at the 324 Building	2/25/2002	AIR 01-608
	561	Tank Farm Restoration and Safe Storage	7/5/2006	AIR 03-1101
	610	Consolidated T Plant Operations	7/5/2006	AIR 06-104
	461	Roof Replacement Activities Involving Radioactive Contamination at Facilities on the Central Plateau	7/5/2006	AIR 02-514
	486	Categorical Tank Farm Facility Entry and Surveillance	7/5/2006	AIR 02-1251
	500	Entering and Characterizing of the 224-T Facility Process Cells	5/16/2005	AIR 02-704
	411	Portable/Temporary Radionuclide Airborne Emissions Units (PTRAEU)	7/5/2006	AIR 02-1220
	435	Tank Farm Restoration and Safe Storage	12/31/2002	AIR 02-901
	455	Interim stabilization activities associated with removal of remaining pumpable liquids present in the 244-AR facility	8/6/2004	AIR 02-1108
448	188	Sitewide Vented Container Storage	7/5/2006	AIR 02-1215
454	272	Construction and Operation of the 200 Area Interim Storage Area (ISA)	7/5/2006	AIR 02-709
455	582	Operation of the Transuranic Waste Retrieval Project	7/5/2006	AIR 03-1206
	410	HEPA Filtered Vacuum Radioactive Air Emission Units (HVU)	7/5/2006	AIR 03-1217
	461	Roof Replacement Activities Involving Radioactive Contamination at Facilities on the Central Plateau	7/5/2006	AIR 02-514
461	292	Modular Containment (PermaCon) for Sampling Activities at the Central Waste Complex	7/29/2002	RTAM
465	7	Purgewater Modutanks	7/5/2006	AIR 03-1201
472	377	Trench 31 and 34: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal)	7/5/2006	AIR 02-1219

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
473	377	Trench 31 and 34: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal)	7/5/2006	AIR 02-1219
476	561	Tank Farm Restoration and Safe Storage	7/5/2006	AIR 03-1101
	586	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase 1 - Site Preparation and System Installation	7/5/2006	AIR 05-406
	624	Installation and Operation of Waste Retrieval Systems in Tanks 241-AZ-101, 241-AZ-102, 241-AY-101, and 241-AY-102.	7/5/2006	AIR 05-708
	482	Excavation Activities for the Building of Temporary Construction Facilities and the Main Facilities for the River Protection Project-Waste Treatment Plant (RPP-WTP)	7/5/2006	AIR 02-1014
	492	Retrieving Buried Containers of Transuranic (TRU) and Suspect-TRU Waste From the Low-Level Burial Grounds (LLBG)	12/12/2003	AIR 02-103
	548	244-CR Vault Isolation and Interim Stabilization	7/5/2006	AIR 02-1255
	435	Tank Farm Restoration and Safe Storage	12/31/2002	AIR 02-901
	455	Interim stabilization activities associated with removal of remaining pumpable liquids present in the 244-AR facility	8/6/2004	AIR 02-1108
	461	Roof Replacement Activities Involving Radioactive Contamination at Facilities on the Central Plateau	7/5/2006	AIR 02-514
	250	Guzzler Excavation and Backfilling Activities in Support of the 200 East Area A Farm Complex	7/5/2006	AIR 02-1238
	296	Installation and Operation of Waste Retrieval Systems in Tanks 241-AZ-101 and 241-AZ-102	7/26/2005	AIR 02-503
	328	Use of the Guzzler Vacuum Excavation System for Radiologically Limited Activities on the Hanford Site.	7/5/2006	AIR 02-302
477	660	Tank Farm Waste Transfer Pits 241-ER-152 and 244-A Lift Station	7/5/2006	AIR 06-625
479	336	219-S Waste Handling Facility Secondary Containment Upgrade (Project W-178)	8/21/2002	NOC revision
480	324	Soil Characterization Using the Cone Penetrometer	11/19/2002	AIR 98-1009
481	350	Addition of 200 Area Effluent Treatment Facility (ETF) Load-In Station Filter Skid	1/15/2004	AIR 02-208
482	441	Stabilizing the Hexone Tanks 276-S-141 and 276-S-142	5/24/2002	AIR 02-101
483				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	360	By-Passing the 244-U Double Contained Receiver Tank (DCRT) During Saltwell Pumping	11/19/2002	Shortform
486	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
	624	Installation and Operation of Waste Retrieval Systems in Tanks 241-AZ-101, 241-AZ-102, 241-AY-101, and 241-AY-102.	7/5/2006	AIR 05-708
	631	Cleaning Radiologically Contaminated Vehicles	7/5/2006	AIR 06-107
	598	Construction and Operation of a Fuel Storage Facility at the Plutonium Finishing Plant Complex	12/30/2004	AIR 04-605
	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
	610	Consolidated T Plant Operations	7/5/2006	AIR 06-104
	623	Operation of the Integrated Disposal Facility (IDF)	7/5/2006	AIR 06-301
	590	Supplemental Treatment Test and Demonstration Facility	7/5/2006	AIR 04-1001
	605	Indoor Releases Performed With Uranium Hexafluoride in the UO-3 Plant Complex 200W Area.	12/28/2004	AIR 04-815
	585	Plutonium Finishing Plant Decontamination Trailer	12/30/2004	AIR 04-309
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
	586	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase 1 - Site Preparation and System Installation	7/5/2006	AIR 05-406
	567	241-S-102 Installation and Operation of Waste Retrieval Systems	7/5/2006	AIR 04-503
	579	241-C-200 Series Tanks Retrieval	7/5/2006	AIR 04-401
	578	Isolation and Closure of Exhaust Stacks 296-A-25, 296-B-28, 296-S-22 and 296-T-18	7/5/2006	AIR 03-611
	582	Operation of the Transuranic Waste Retrieval Project	7/5/2006	AIR 03-1206
	565	241-AN Tank Farm Installation and Operation of a New Ventilation System	7/5/2006	AIR 03-602
	566	241-AW Tank Farm Installation and Operation of a New Ventilation System	7/5/2006	AIR 03-712
	571	Tank Farm Decontamination Trailers	7/5/2006	AIR 03-502
	561	Tank Farm Restoration and Safe Storage	7/5/2006	AIR 03-1101

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
562		Operation of the Liquid Effluent Retention Facility and the 200 Area Effluent Treatment Facility	7/5/2006	AIR 04-101
563		Decontamination for Transition of the 241-Z Liquid Waste Treatment Facility to Demolition	4/3/2006	AIR 03-1109
539		Installation of Breather Filter on Tank 241-C-106	6/14/2006	AIR 03-203
540		Liquid Pumping and Enhanced Sluicing on Tank 241-C-106	7/5/2006	AIR 03-1102
548		244-CR Vault Isolation and Interim Stabilization	7/5/2006	AIR 02-1255
492		Retrieving Buried Containers of Transuranic (TRU) and Suspect-TRU Waste From the Low-Level Burial Grounds (LLBG)	12/12/2003	AIR 02-103
500		Entering and Characterizing of the 224-T Facility Process Cells	5/16/2005	AIR 02-704
504		Exhaust Fan Replacement at the 291-T-1 Stack	9/29/2005	AIR 02-509
482		Excavation Activities for the Building of Temporary Construction Facilities and the Main Facilities for the River Protection Project-Waste Treatment Plant (RPP-WTP)	7/5/2006	AIR 02-1014
486		Categorical Tank Farm Facility Entry and Surveillance	7/5/2006	AIR 02-1251
489		Vapor Sampling of Miscellaneous Underground Units	7/5/2006	AIR 02-1252
455		Interim stabilization activities associated with removal of remaining pumpable liquids present in the 244-AR facility	8/6/2004	AIR 02-1108
461		Roof Replacement Activities Involving Radioactive Contamination at Facilities on the Central Plateau	7/5/2006	AIR 02-514
470		Radioactive Asbestos Removal From the Exterior of Hanford Facilities Located in the 200 Areas	8/10/2004	AIR 01-609
435		Tank Farm Restoration and Safe Storage	12/31/2002	AIR 02-901
438		Operation of a Conex Box Adapted to Allow Ambient Air Drying of Radionuclide Contaminated Green Vegetation	10/31/2003	AIR 02-516
296		Installation and Operation of Waste Retrieval Systems in Tanks 241-AZ-101 and 241-AZ-102	7/26/2005	AIR 02-503
327		Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping	9/22/2005	AIR 02-1020
553		Transition of the 232-Z Contaminated Waste Recovery Process Facility at the Plutonium Finishing Plant	8/17/2004	AIR 03-902
555		E-525 Double-Shell Tank (DST) Transfer System Modifications Project	7/5/2006	AIR 04-1208
5		Tank Waste Remediation System Vadose Zone Characterization	7/5/2006	AIR 02-1232
23		Construction and operation of the Waste Receiving and Processing (WRAP) Facility	7/5/2006	AIR 02-703
517		Waste Treatment Plant Phase I	8/6/2004	AIR 03-310

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	518	Stabilization, Deactivation, and Demolition of the Plutonium Finishing Plant (PFP) Ancillary Buildings and Structures	12/30/2004	AIR 02-807
	550	Installation and Operation of Waste Retrieval Systems in Single-Shell Tank (SST) 241-S-112	7/5/2006	AIR 06-109
489	356	Operation of the 4843 Building Waste Inspection Facility	10/25/2002	Shortform
490	403	Tank Farm Waste Transfer Pit 244-TX Double Contained Receiver Tank (DCRT)	8/10/2004	AIR 02-1243
492	408	Tank Farm 241-TX-154 Diversion Box	8/10/2004	AIR 02-1245
493	407	Tank Farm 241-S-151 Diversion Box	8/10/2004	AIR 02-1244
497	424	244-CR Vault work activities	8/6/2004	AIR 00-206
498	540	Liquid Pumping and Enhanced Sluicing on Tank 241-C-106	7/5/2006	AIR 03-1102
	548	244-CR Vault Isolation and Interim Stabilization	7/5/2006	AIR 02-1255
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
499	120	S-Farm removal of duct work and associated exhausters	10/15/2002	AIR 95-1004
501	446	300 Area Process Sewer Cleanout	12/31/2002	AIR 00-708
503	450	Plutonium Finishing Plant Stabilization and Packaging Equipment	12/30/2004	AIR 04-202
	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
504	451	Use of Portable Tanks and Revised Source Term Description at Waste Sampling and Characterization Facility (WSCF)	7/5/2006	AIR 02-1102
539	5	Tank Waste Remediation System Vadose Zone Characterization	7/5/2006	AIR 02-1232
541	5	Tank Waste Remediation System Vadose Zone Characterization	7/5/2006	AIR 02-1232
560				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	506	Operation of a Mobile Decontamination Trailer	8/6/2004	AIR 02-410
689				
	526	Stabilization of Two Concrete Boxes Containing Ion Exchange Columns in 183-KW Vault	3/15/2006	AIR 02-810
712				
	539	Installation of Breather Filter on Tank 241-C-106	6/14/2006	AIR 03-203
713				
	548	244-CR Vault Isolation and Interim Stabilization	7/5/2006	AIR 02-1255
716				
	539	Installation of Breather Filter on Tank 241-C-106	6/14/2006	AIR 03-203
717				
	539	Installation of Breather Filter on Tank 241-C-106	6/14/2006	AIR 03-203
735				
	593	Operation of New Ventilation Systems in AN and AW Tank Farms	7/5/2006	AIR 05-208
736				
	593	Operation of New Ventilation Systems in AN and AW Tank Farms	7/5/2006	AIR 05-208
738				
	578	Isolation and Closure of Exhaust Stacks 296-A-25, 296-B-28, 296-S-22 and 296-T-18	7/5/2006	AIR 03-611
740				
	578	Isolation and Closure of Exhaust Stacks 296-A-25, 296-B-28, 296-S-22 and 296-T-18	7/5/2006	AIR 03-611
742				
	578	Isolation and Closure of Exhaust Stacks 296-A-25, 296-B-28, 296-S-22 and 296-T-18	7/5/2006	AIR 03-611
744				
	578	Isolation and Closure of Exhaust Stacks 296-A-25, 296-B-28, 296-S-22 and 296-T-18	7/5/2006	AIR 03-611
747				
	563	Decontamination for Transition of the 241-Z Liquid Waste Treatment Facility to Demolition	4/3/2006	AIR 03-1109
749				
	579	241-C-200 Series Tanks Retrieval	7/5/2006	AIR 04-401
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
751				
	555	E-525 Double-Shell Tank (DST) Transfer System Modifications Project	7/5/2006	AIR 04-1208
755				
	582	Operation of the Transuranic Waste Retrieval Project	7/5/2006	AIR 03-1206
756				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	582	Operation of the Transuranic Waste Retrieval Project	7/5/2006	AIR 03-1206
855				
	593	Operation of New Ventilation Systems in AN and AW Tank Farms	7/5/2006	AIR 05-208
856				
	593	Operation of New Ventilation Systems in AN and AW Tank Farms	7/5/2006	AIR 05-208
874				
	709	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 06-664
	608	Deactivation of the Plutonium Finishing Plant Complex	7/7/2006	AIR 05-1101
	598	Construction and Operation of a Fuel Storage Facility at the Plutonium Finishing Plant Complex	12/30/2004	AIR 04-605
878				
	590	Supplemental Treatment Test and Demonstration Facility	7/5/2006	AIR 04-1001
885				
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
886				
	587	Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations	7/5/2006	AIR 05-407
887				
	660	Tank Farm Waste Transfer Pits 241-ER-152 and 244-A Lift Station	7/5/2006	AIR 06-625
888				
	572	Tanker Truck Loading of Radioactively Contaminated Waste Water	7/5/2006	AIR 06-105
894				
	661	Installation and Operation of Breather Filter on Tank 241-UX-302A, 241-AZ-154, and 241-U-301B	7/5/2006	AIR 06-503
1129				
	661	Installation and Operation of Breather Filter on Tank 241-UX-302A, 241-AZ-154, and 241-U-301B	7/5/2006	AIR 06-503
1130				

EU ID	NOC ID	Project Title	Date Obsolete	Permit Number
	661	Installation and Operation of Breather Filter on Tank 241-UX-302A, 241-AZ-154, and 241-U-301B	7/5/2006	AIR 06-503
1180	158	Approval to relocate Portable Radon Research Facility to any location on site	12/30/2002	AIR 96-506

7.0 CERCLA APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

CERCLA Substantive Requirements -- Applicable or Relevant and Appropriate Regulations

[WAC 246-247-040]

Regulations promulgated under statutory authority other than the FCAA (e.g., RCRA and CERCLA) are not Title V applicable requirements and are not included in the license. In addition, actions taken pursuant to CERCLA are exempt from permitting. However, the actions taken must meet the substantive requirements of applicable or relevant and appropriate regulations (ARARs) (e.g., WAC 246-247-040, ALARACT). Characterization and cleanup activities are being conducted at Hanford pursuant to CERCLA. The characterization and cleanup activities are applying best available radionuclide control technology to control emissions, and emissions are being monitored to ensure that the offsite dose to the maximally exposed individual is below the applicable standards. The CERCLA decision documents, such as an Action Memo, identify ARARs.

**Enclosure 1: MEMORANDUM OF UNDERSTANDING BETWEEN THE
DEPARTMENT OF ECOLOGY AND THE DEPARTMENT OF HEALTH**

This Enclosure contains material moved, without change, from pages 12 through 19 of Attachment 2.

MEMORANDUM OF UNDERSTANDING

Between the

Washington State Department of Ecology

and the

Washington State Department of Health

Related to the

RESPECTIVE ROLES AND RESPONSIBILITIES

OF THE TWO AGENCIES IN COORDINATING ACTIVITIES

CONCERNING HANFORD SITE RADIOACTIVE AIR EMISSIONS

DOH Contract # N16119

PURPOSE

This Memorandum of Understanding (MOU) is between the Washington State Department of Health (Health) and the Washington State Department of Ecology (Ecology) under authorities granted within Chapters 43.70, 43.21A, 70.94, and 70.98 of the Revised Code of Washington (RCW). This MOU supersedes the DOH contract N14256. The purpose of this MOU is to clarify the respective roles of Health and Ecology in the issuance and administration of air operating permits and the performance of new source reviews at Hanford. It recognizes Health as the state agency responsible for public health protection and the primary agency responsible for regulation of Hanford facility radioactive air emissions (except as provided in Clause 5 of Ecology's Roles and Responsibilities). It recognizes Ecology as the agency responsible for environmental protection as described in this MOU, including both nonradioactive air and radioactive air issues with specific responsibilities for radionuclides outlined below.

BACKGROUND

Health and Ecology share responsibility for the control of radioactive air emissions pursuant to state and federal statutes. Both agencies have authority to set standards for and to regulate radioactive air emissions per RCW 70.94 and RCW 70.98.

This MOU is designed to aid coordination between the agencies, and to avoid conflicting regulatory requirements for radioactive air emissions at the Hanford facility. This MOU defines the respective roles of Health and Ecology in the regulation of Hanford Site radioactive air emissions, including the determination of compliance, radioactive air emissions control technology standards and the performance of new source review.

NOTE: This document does not affect the delegation from the U.S. Environmental Protection Agency (EPA) of the National Emission Standards for Hazardous Air Pollutants Program.

RECITALS

Chapter 70.94 RCW and Chapter 173-401 Washington Administrative Code (WAC), administered by Ecology, establish a comprehensive air operating permit program in Washington State consistent with the requirements of Title V of the federal Clean Air Act (42 U.S.C. 7401, et seq.). All sources subject to these laws and regulations must have a permit to operate that assures compliance by the source with all applicable requirements.

Chapter 70.98 RCW and chapter 246-247 WAC, administered by Health, establish radioactive air emission requirements. These requirements are "applicable requirements" under Ecology's WAC 173-401-200.

Air emissions, including radioactive air emissions, at the Hanford Site must be covered under an air operating permit. The U. S. Department of Energy (USDOE) is required to submit two copies of its air operating permit application, one to Health for the licensing of radionuclides, and one to Ecology for the permitting of nonradioactive air emissions. Health will issue a radionuclide air emission license (hereinafter "radioactive air emissions license" or "license") for USDOE, which will be incorporated into the air operating permit issued by Ecology as an applicable requirement in accordance with the interagency procedures outlined below. A permit will be issued by Ecology with Health as a signatory reviewer and issuer of the radioactive air emissions license portion of the permit.

Health and Ecology will work with USDOE to establish a schedule of application submittals. All air operating permits for the Hanford facility will be issued by Ecology and reviewed by Health. All future re-openings, revisions and renewals of permits will follow the same process as outlined in this MOU.

NOTE: Wherever practicable, the provisions of this MOU shall apply to new source review, as well as to air operating permits.

DEFINITIONS

The definitions of terms contained in Chapters 173-400 and 173-401 WAC are incorporated by reference, unless otherwise defined here. Unless a different meaning is clearly required by context, the following words and phrases, as used in this MOU, shall have the following meanings:

“Compliance determination” refers to the process whereby Health verifies how and whether a specific source meets standards set by Ecology in Chapter 173-480 WAC.

“License” or “radioactive air emissions license” refers to the document issued by Health in accordance with Chapter 246-247 WAC that prescribes the relevant control requirements for radionuclide air emissions.

“Permit” or “operating permit” refers to the document issued by Ecology to USDOE in accordance with Chapter 173-401 WAC, chapter 70.94 RCW, and Title V of the federal Clean Air Act (42 U.S.C. 7401, et seq.). The operating permit gathers in one document all air emission limitations and requirements that apply to a given source.

“Primary or Primarily” - While both Ecology and Health have authority to regulate radionuclide air emissions under Chapters 70.94 RCW and 70.98 RCW, respectively, “primary” exercise of that authority means that, unless extenuating circumstances exist (for example, see Clauses 5 and 6 in the Joint Rules and Activities section), Health will be responsible for the particular activity.

“Standard,” without further description, refers to any requirement established by Ecology through revision of Chapter 173-480 WAC that limits the quantity, rate or concentration of emissions of air pollution on a continuous basis including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction, and any design, equipment, work practice or operational standard promulgated under Chapter 173-480 WAC.

RESPECTIVE ROLES AND ACTIVITIES OF
OF ECOLOGY AND HEALTH

The parties to this MOU describe their responsibilities as follows:

Ecology

1. Ecology issues the air operating permit.
2. Ecology is the state agency responsible for federal and state regulation of nonradioactive hazardous air pollutants at Hanford.
3. Ecology is the point of contact for issues and questions involving nonradioactive air emissions.
4. Ecology is the state agency responsible for determining requirements related to control technologies for nonradioactive air emissions.
5. Ecology sets air quality and emission standards for radioactive air emissions in Chapter 173-480 WAC.¹

Health

1. Health is the state agency primarily responsible for regulation of Hanford Site radionuclide air emissions (except as provided in Clause 5 of Ecology's Roles and Responsibilities). This responsibility does not alter, in any way, existing statutory authorities of Health or Ecology.
2. Health is the state agency primarily responsible for evaluating airborne radionuclide emissions, including during new source reviews, and the agency responsible for the issuance of a radionuclide license that will be incorporated into the Hanford Air Operating Permit consistent with such evaluations.
3. Health is the point of contact for issues and questions pertaining to the regulation of Hanford Site radioactive air emissions.
4. Health is the state agency primarily responsible for evaluating airborne radioactive emissions in order to verify that offsite doses comply with

¹Addition of this clause clarifies that the vehicle anticipated to be the primary way for Ecology to regulate is through the establishment of standards by the rule revision process and does not eliminate any powers that Ecology may have to regulate if Health fails to perform. The Joint Responsibilities section refers to scenarios in which Ecology may exercise its authority in other ways.

applicable human health standards, and that site worker exposures from radionuclide air emissions are as low as reasonably achievable.

5. Health is the state agency primarily responsible for the implementation of state and federal requirements for radioactive air emission control technology, using EPA guidance for "top down" Best Available Control Technology (BACT). In Health's regulations the BACT process has been adapted to radionuclides and called BARCT in accordance with Chapter 173-480 WAC.
6. Health establishes control requirements for radionuclides for Hanford in a license, issued under Chapter 246-247 WAC, that is incorporated into the air operating permit for Hanford.

JOINT ROLES AND ACTIVITIES OF
THE DEPARTMENTS OF ECOLOGY AND HEALTH

The parties to this MOU recognize and agree to the following:

1. A staff point of contact for each agency will be identified for each Hanford Site new source or source modification to ensure that both agencies' interests are maintained, and to ensure that requirements placed on Hanford facilities are compatible.
2. If it can be demonstrated by Ecology that there will be risk to the public or to the environment without the use of technology different than that proposed by Health, Ecology may request that Health implement the different technology. Health will consider Ecology's request and justify its conclusion on whether to implement the requested technology. If the two parties cannot agree, the issue shall be referred to the General Dispute Resolution Process outlined in this MOU.
3. Both Ecology and Health are committed to cooperation and the sharing of pertinent information in order to aid compliance with applicable regulations, and to ensure protection of both human health and the environment.
4. In accordance with RCW 70.94.162(1) and §502(b)(3) of the federal Clean Air Act Amendments of 1990, air operating permit fees will cover all costs involved in administering the Operating Permit Program with respect to sources of air emissions. Health will bill Energy and collect fees separately, in accordance with Chapter 246-254 WAC, for all non-air operating permit costs incurred by Health in regulating radionuclides. Ecology's permit program costs will include permit administration costs and development and

oversight costs associated with Health's regulatory activities. Ecology will also bill USDOE and collect fees separately for all costs incurred by Ecology in the setting of standards and regulation of radionuclide air emissions, as well as for all costs incurred by Ecology in regulating nonradioactive air emissions. Health and Ecology will avoid billing USDOE for overlapping costs regarding the Hanford facility. There will be separate costs for separate duties under separate authorities.

5. Both Ecology and Health have identical enforcement authority under Chapter 70.94 RCW, and access to all applicable areas of the Hanford facility for inspections by both or either of the agencies will be a condition of the permit. Health will assume primary responsibility for inspection and enforcement actions that involve only radionuclides at Hanford, including the issuance of notices of violations and any administrative or judicial proceedings that stem from such actions. Ecology will have responsibility for inspection and enforcement actions that involve only nonradionuclides at Hanford, including the issuance of notices of violations and any administrative or judicial proceedings that stem from such actions. Wherever inspections or enforcement actions involve both radionuclide and nonradionuclide air emissions at Hanford, both agencies will share responsibility, including responsibility for issuance of notices of violations and any administrative or judicial proceedings that stem from such actions. However, in all instances of suspected violation, the agencies will confer before a notice of violation is issued (unless an imminent and substantial threat to the environment or human health exists - see below). The EPA will have enforcement authority over all federally enforceable portions of the permit.

If in Ecology's judgment it can be demonstrated that there is risk to the public or to the environment from radioactive air emissions, Ecology will consult with Health. If Health fails to adequately address Ecology's concerns, the Dispute Resolution process outlined in this document will be followed, beginning at the section manager level. If a dispute arises as to which agency is responsible for enforcement, the dispute resolution procedures outlined in this MOU shall be followed, except as provided in Clause 6 of the Joint Roles and Activities Section. No enforcement action on the issue under consideration may be taken by either party until the full dispute resolution procedures have been followed, except as provided in Clause 6 of the Joint Roles and Activities Section.

6. If either agency recognizes an imminent and substantial threat to human health or the environment, that agency may take steps to mitigate the problem, then consult the other agency, and if warranted, follow the dispute resolution process.

7. Under the timeline requirements for operating permit issuance, Health will handle all radioactive air emissions license procedures, and Ecology will handle all air operating permit issuance procedures and requirements as per this MOU. Ecology will submit notices of permit issuance, modifications, and renewals to the Permit Register as required under WAC 173-401-805. The two agencies will hold joint hearings and will jointly assure proper notice of hearings. The two agencies will jointly prepare responses to public comments. Ecology will submit notices, comments, and the proposed permit to EPA.
8. Under the timeline requirements for operating permit issuance, permitting authorities have 180 days between the time a completeness determination is made and the time when the Draft Permit or Renewal is due. Under this MOU, each agency (Ecology and Health) shall submit to the other a Draft of its license or portion of a Hanford Operating Permit within 90 days after the date that a completeness determination is due or made. Each will then have 30 days to send comments to the other agency. Each agency will then have 30 days to respond to the comments and revise the license or the original Draft Permit. Each agency will have discretion to consider comments received after the 30-day comment period has expired. If a disagreement exists or one agency believes the other agency's response to the comments is insufficient, the issue shall follow the dispute resolution process outlined in this MOU, but in no event shall the deadlines for permit submittals to the EPA be missed.

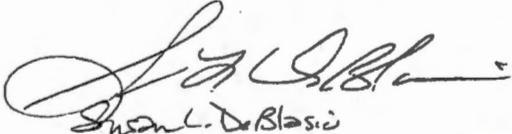
GENERAL RESOLUTION OF DISPUTES

Both agencies recognize the time constraints that are involved with meeting the operating permit deadlines under the federal Clean Air Act and commit to resolving disputes as expeditiously as possible. Disputes arising from the implementation of this MOU will be resolved at the lowest level possible utilizing standard agency chains of command. Elevation to Ecology's Deputy Director and Health's Assistant Secretary for Environmental Health shall occur only after all reasonable efforts at the Program and Division level have failed or after two weeks after a comment period deadline has passed, whichever comes first. If the dispute still cannot be resolved at the Assistant Director and Assistant Secretary levels, the dispute shall be referred to the Director of Ecology and the Secretary of Health. If the dispute cannot be resolved at the highest agency levels within one week, the dispute shall be referred to the Governor's Office in accordance with RCW 43.17.330. Both agencies shall refrain from issuing a final determination until all disputes are resolved, but in no event shall the deadlines for permit submittals to the EPA be missed.

EFFECTIVE DATE, MODIFICATION, AND TERMINATION

This Memorandum of Understanding shall be effective upon signature by the parties, may be amended in writing by mutual consent, and may be terminated by either party after giving 30 days notice to the other party.

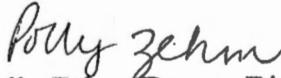
Signatures:



~~Susan L. DeBlasio~~
Ann Thompson, Contracts Manager
Washington State Department of Health

5/15/07

Date



Polly Zehm, Deputy Director
Washington State Department of Ecology

Date 5/18/07