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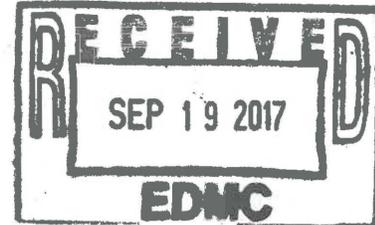
STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 14, 2017

17-NWP-119

Mr. Doug Shoop, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: H5-20  
Richland, Washington 99352



Re: Inspection Close-out Letter for Air Operating Permit (AOP) Discharge Points 1.4.33 and 1.4.35.

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 communicates the results of an inspection of discharge points 1.4.33 and 1.4.35, performed by Daniel Heuston on May 30, 2017.

Compliance with applicable conditions of AOP 00-05-06 Renewal 2, Revision B and applicable Notice of Construction (NOC) Approval Orders were the basis for the inspection. Records were reviewed for the inspection time period January 1, 2015, to May 30, 2017. The results of the inspection and compliance determinations are provided below.

#### 1.4.33 Lagoon Treatment System

Ecology has determined that discharge point 1.4.33 Lagoon Treatment System was in **continuous compliance** from January 1, 2015, to May 30, 2017. Please see below for details of compliance determination.

- **Condition: All TAPs, as submitted in the Permittee's Notice of Construction Application, shall be below their respective ASIL.**
  - Compliance is to be demonstrated by using surrogate wastewater sampling conducted annually and operational record keeping. Results of the analysis were provided and records of operation were observed on-site during the inspection.

Wastewater concentrations provided in Table 2 of DE12NWP-001 were developed using WATER9 and AERMOD as surrogate way to verify if Toxic Air Pollutants (TAPs) emissions exceed the respective Acceptable Source Impact Levels (ASILs) provided in Table 1. The records indicate that all 2016 and 2015 TAPs were below Table 2 values which demonstrates compliance with this condition.



#### 1.4.35 Hanford Site Asbestos Landfill

Ecology has determined that discharge point 1.4.35 Hanford Site Asbestos Landfill was in **continuous compliance** from January 1, 2015, to May 30, 2017. Please see below for details of compliance determination.

- **Condition: 40 CFR 61.151(a):** (1) Either discharge no visible emissions to the outside air from an inactive waste disposal site subject to this paragraph; or (2) Cover the asbestos-containing waste material with at least 15 centimeters (6 inches) of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area adequate to prevent exposure of the asbestos-containing waste material. In desert areas where vegetation would be difficult to maintain, at least 8 additional centimeters (3 inches) of well-graded, nonasbestos crushed rock may be placed on top of the final cover instead of vegetation and maintained to prevent emissions; or (3) Cover asbestos-containing waste with at least 60 centimeters of compacted nonasbestos-containing material, and maintain to prevent exposure.
  - When the landfill was operational (pre-1996), a daily cover was placed over the asbestos containing waste material at the end of each day of operation. After the solid waste landfill ceased operations in 1996, an interim soil cover was placed over the trenches. The interim soil cover was graded, contoured, and revegetated. It is estimated that the asbestos is covered with 4 to 6 feet of nonasbestos-containing material containing an adequate mixture of coarse-grained sands and gravels to minimize erosion, prevent asbestos exposure, and control dust emissions.  
  
The interim soil cover will continue to be inspected for signs of excessive and/or subsidence and appropriate corrective actions will be taken, if and when needed. The above adequately demonstrates compliance with this permit conditions.
- **Condition: 40 CFR 61.151(d): Notify in writing at least 45 days prior to excavation.** If construction will begin on a date other than the one in the original notice, notice of the new date must be provided at least 10 working days in advance. (1) Notice shall contain starting and completion dates. (2) Notice shall contain reason for disturbing the waste. (3) Notice shall contain procedures to be used to control emissions. (4) Notice shall contain a location for any temporary storage site and the final disposal site.
  - No excavation requiring notice was performed during the inspection period.
- **Condition: 40 CFR 173-400-040(2):** Permittee is considered to be in compliance if no complaints are forwarded or generated by Ecology.
  - No complaints have been forwarded to or generated by Ecology.

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- **Condition: 40 CFR 173-400-040(7):** Permittee is considered to be in compliance if no complaints are forwarded or generated by Ecology.
  - No complaints have been forwarded to or generated by Ecology.

If 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

lkd

cc electronic:

Laura Buelow, EPA  
Donald Dossett, EPA  
Katie McClintock, EPA  
Bryan Trimberger, USDOE-ORP  
Christopher Kemp, USDOE-ORP  
Eric Faust, USDOE-RL  
Reed Kaldor, MSA  
Jon Perry, MSA  
Matthew Barnett, PNNL  
Rose Ferri, YN  
Ken Niles, ODOE  
John Martell, WDOH  
Lilyann Bauder, Ecology  
Philip Gent, Ecology  
Daniel Heuston, Ecology  
Ron Skinnarland, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
PNNL Correspondence Control  
USDOE-ORP Correspondence Control  
USDOE-RL Correspondence Control

cc:

Robin Priddy, BCAA  
Matt Johnson, CTUIR  
Jack Bell, NPT  
Rose Longoria, YN  
Susan Leckband, HAB  
Administrative Record  
NWP Central File