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0065658

05-ESD-0069

JUN 24 2005

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

RECEIVED
JUL 12 2005

EDMC

Dear Mr. Wilson:

HANFORD SITE AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
INSIGNIFICANT EMISSION UNIT (IEU) EVALUATION PROCESS

Reference: RL ltr. to Messrs. A. W. Conklin, Washington State Department of Health, R. Kreizenbeck, U.S. Environmental Protection Agency, D. A. Lauer, Benton County Air Authority, and M. A. Wilson, Washington State Department of Ecology (Ecology), from K. A. Klein, "DOE/RL-2005-24, Hanford Site Air Operating Permit Renewal Application Covering the Period July 1, 2001 through December 31, 2004," 05-ESD-0028, dtd. April 15, 2005.

The purpose of this letter is to document agreement between our staffs regarding provision of supplemental information on IEUs. During AOP renewal application meetings, Ecology communicated the expectation that the renewal process include evaluation of IEUs. Section 2.4 of the AOP renewal application committed to provide an updated IEU discussion as supplemental information to the application. A process to arrive at the supplemental IEU information was agreed-to in a meeting with Ecology on May 3, 2005. Ecology later verified the agreement by email dated May 3, 2005.

The enclosure contains the agreed-to IEU evaluation process. IEU supplemental information will be transmitted to Ecology by December 29, 2005.

If you have questions, please contact me, or your staff may contact Doug S. Shoop, Assistant Manager for Safety and Engineering, on (509) 376-0108.

Sincerely,

Keith A. Klein
Manager

ESD:MFJ

Enclosure

cc: See page 2

cc w/encl:

Administrative Record (Hanford Air Operating Permit 2005)

Environmental Portal, A3-01

E. S. Aromi, CH2M

B. P. Atencio, PNNL

G. Bohnee, NPT

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S. L. Clark, WDOH

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B. J. Dixon, FHI

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L. L. Fritz, FHI

R. G. Gallagher, FHI

W. E. Green, FHI

R. D. Haggard, BNI

D. W. Hendrickson, Ecology

R. Jim, YN

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J. J. Martell, WDOH, MSIN B1-42

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J. W. Schmidt, WDOH, MSIN B1-42

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O. S. Wang, Ecology

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R. K. Woodruff, PNNL

J. G. Woolard, BHI

Enclosure

Consisting of 5 pages, including coversheet

Insignificant Emission Unit (IEU) Evaluation Process

(Note: Numbers below correspond to diamonds on the flowchart)

The purposes of the insignificant emission unit (IEU) evaluation process are: 1) to verify emission units and activities identified as insignificant in the initial Hanford Site Air Operating Permit (AOP) application (DOE/RL-95-07) have remained insignificant, and 2) to verify emission units or activities not included in the initial application are appropriately permitted. The process agreed-to focuses on emission units or activities subject to regulation under the Federal Clean Air Act with potential-to-emit nonradioactive air pollutants (criteria and hazardous air pollutants) where operations have not increased. Results of the IEU evaluation process will be transmitted to Ecology by December 29, 2005.

By agreement with Ecology, the following portions of the Hanford Site are *excluded* from the IEU evaluation effort:

1. Areas regulated under the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA). This would include CERCLA clean-up support activities conducted at CERCLA Operable Units.
2. Areas regulated by the *Resource Conservation and Recovery Act, Subparts AA, BB, and CC* (e.g., Treatment, storage, and disposal facilities; and satellite accumulation areas, etc.).
3. Those emission units that have been closed, such as the power plants and package boilers. These were previously documented in the Nonradioactive Air Emissions Inventory Report required by WAC 173-400-105, or in an AOP modification.
4. Those portions of the Hanford Site that were included in the 1994-95 IEU effort, but where operations with the potential to emit criteria/hazardous air pollutants have not increased, such as the Fuel and Materials Examination Facility.
5. Those portions of the Hanford Site that are in surveillance and maintenance modes of operation. Examples are S Plant, U Plant, PUREX, 200 North, B Plant, and portions of the 300 Area.
6. Those emission units and activities included in an active Ecology notice of construction approval or those listed in AOP Attachment 1.

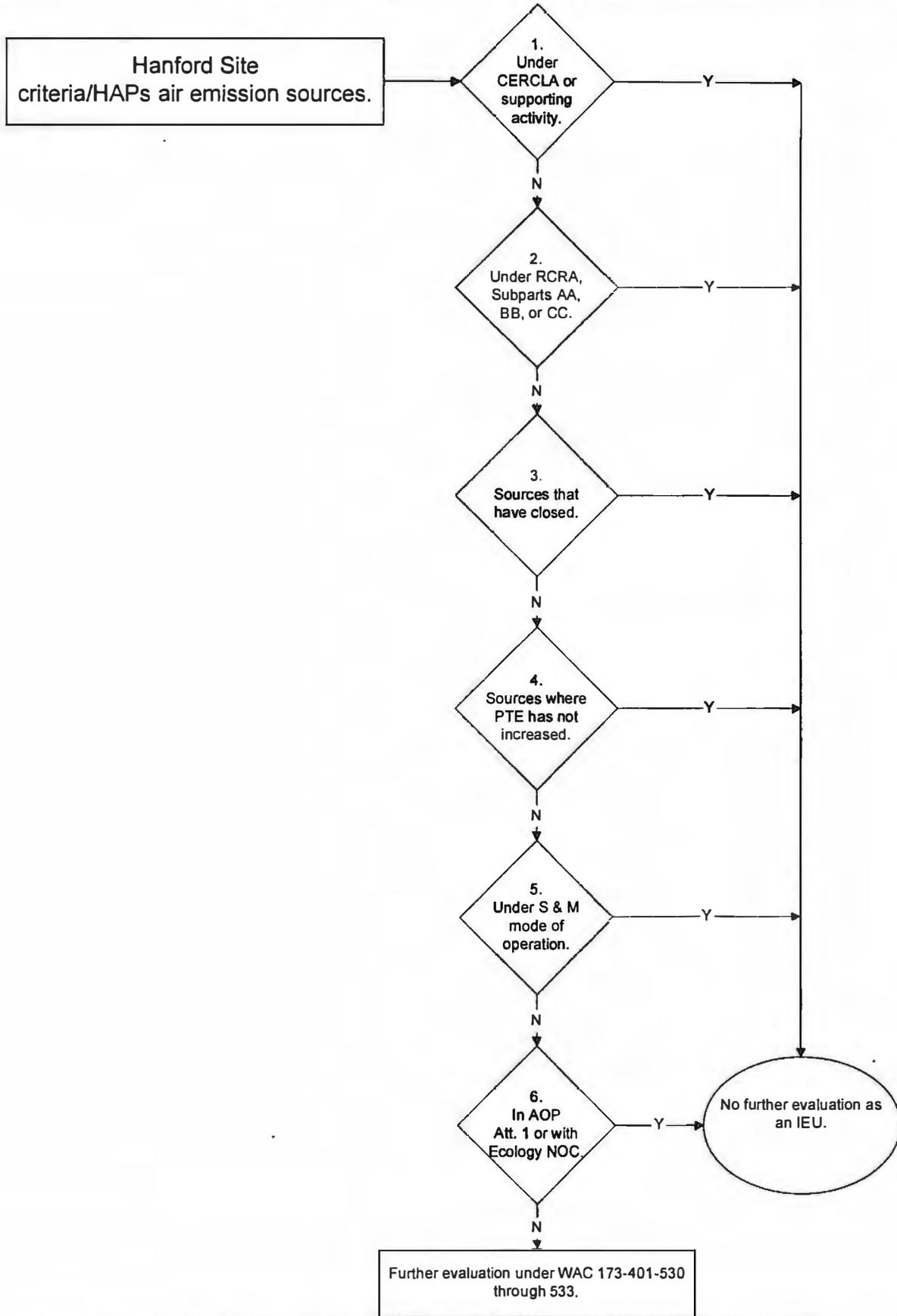
Description of the IEU evaluation effort:

Emission units or activities remaining after exclusion of those portions of the Hanford Site identified in Items 1 through 6 will be evaluated as described in Items 7 through 11.

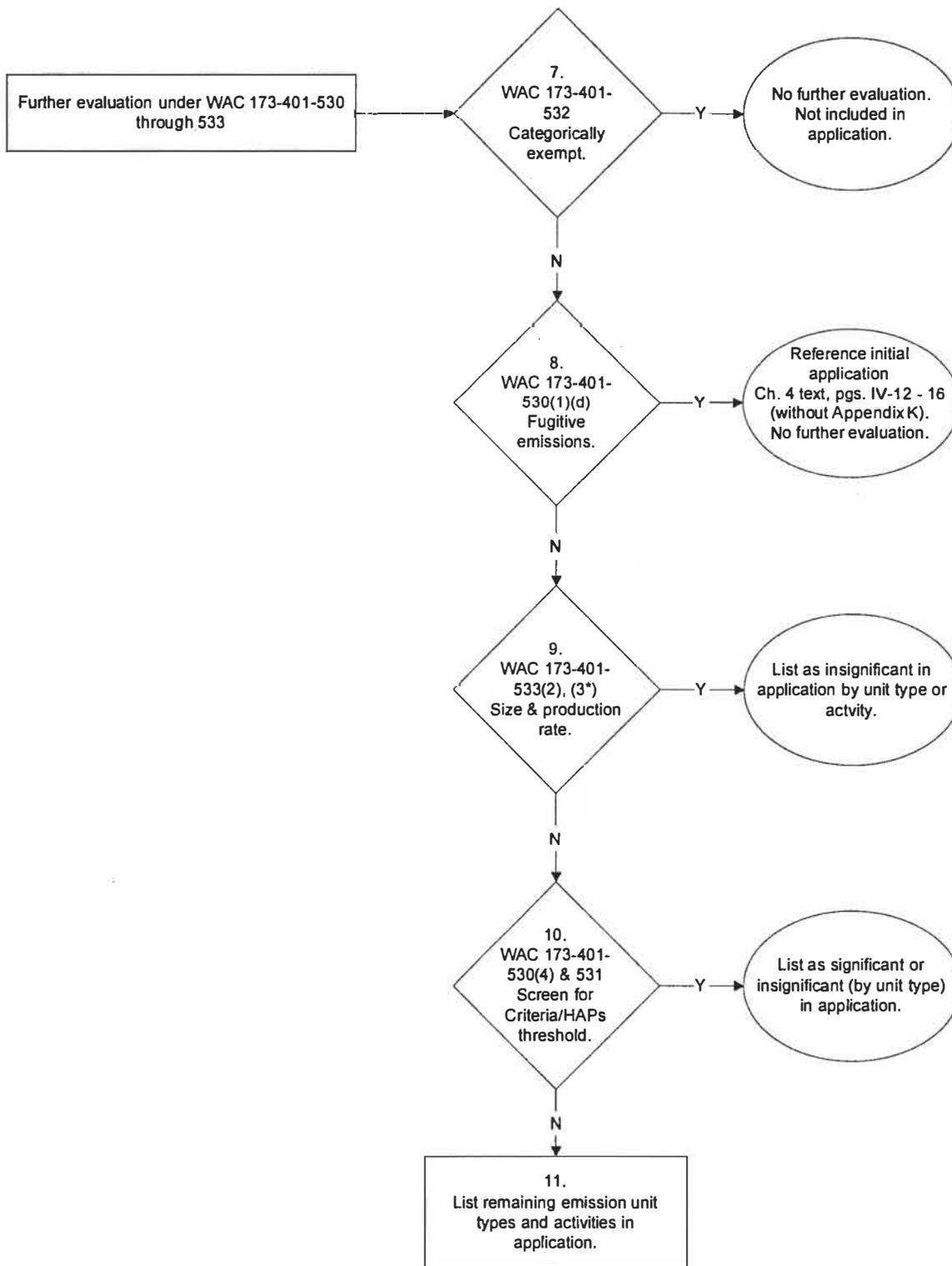
7. Emission units or activities listed as categorically exempt in WAC 173-401-532, do not have to be included in the permit application [WAC 173-401-540(b)]. Categorically-exempt emission units or activities will not undergo further evaluation, nor will they appear in the Ecology transmittal.
8. Fugitive emissions, as addressed in WAC 173-401-530(1)(d), were discussed in Chapter 4, pages IV-12 through IV-16, of the initial AOP application

- (DOE/RL-95-07). That discussion remains accurate. By agreement, no further discussion of emission units or activities generating fugitive emissions will occur.
9. Emission units or activities defined as insignificant based on size and production rate are listed in WAC 173-401-533. These units are required to be listed in the application [WAC 173-401-533(1)]. Ecology will be provided with a table of all emission units or activities contained in WAC 173-401-533(2)(a)-(bb). Each unit or activity contained in the table will be marked as either "Yes," that unit exists or that activity occurs on the Hanford Site or "No" that unit or activity does not exist or occur on the Hanford Site. This "Yes" or "No" evaluation is consistent with treatment of such IEUs in the Boeing AOPs.
 10. Emission units or activities not addressed in Item 7 through 9 for which a chemical inventory is readily available, will be screened against the air pollutant thresholds shown in WAC 173-401-530(4) and 531. Those emission units or activities exceeding a threshold will be considered as "significant" and will appear in the AOP. Those emission units or activities not exceeding a threshold will be listed, by emission unit type. According to WAC 173-401-530(a), emission units or activities defined as insignificant based on emission thresholds must be listed in the permit application.
 11. Emission units or activities not addressed in Item 7 through 9 for which a chemical inventory is not readily available, will be listed by type. Example emission unit or activity types include the following:
 - internal combustion engines less than or equal to 500 horsepower;
 - instrument maintenance and repair using alcohol or other solvents; and
 - off-road equipment repair or maintenance.

Insignificant Emission Unit Evaluation



Insignificant Emission Unit Evaluation



* WAC 173-401-533(3) Case-by-Case determination includes laboratories.