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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

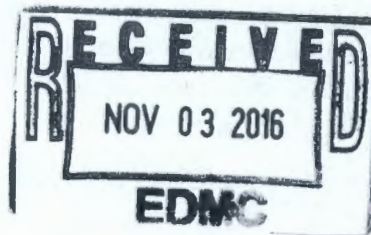
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November 1, 2016

16-NWP-190

Mr. Doug Shoop, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352



Re: Inspection Close-Out Letter for Air Operating Permit (AOP) Discharge Points 1.4.1, 1.4.2, 1.4.9 & 1.4.13

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 Notice of Construction (NOC). This letter is provided to communicate the results of an inspection that was performed on September 24, 2016, of discharge point 1.4.1, 1.4.2, 1.4.9 and 1.4.13 by Ecology. Compliance with applicable conditions of AOP 00-05-06 Renewal 2, Revision B, and Notice of Construction (NOC) Approval Order dated June 6, 1997 was the basis of the inspection. Records were reviewed for time periods January 1, 2015 to September 24, 2016.

Ecology finds conditions in Attachment 1 of the AOP and NOC for this discharge point are satisfied for the timeframe in question. The basis for the determination is provided below with a summary of any action items, and recommendations provided in Table 1.

- In reference to permit conditions for NO_x, SO₂, CO, PM₁₀, and VOC's, it was determined that compliance was successfully demonstrated through a review of the monthly records of fuel use.
- In reference to the Fuel Use permit condition, it was determined that compliance was successfully demonstrated through a review of Records of Fuel Use.
- In reference to the 20% Opacity permit condition, it was determined that compliance was successfully demonstrated through a review of Monthly/Annual Safety Inspection Checklist.
- In reference to the (A) Burners, (B) Boiler Exterior, (C) Combustion Controls, (D) Leaks, and (E) Unusual Noise permit conditions, it was determined that compliance was successfully demonstrated through a review of Monthly/Annual Safety Inspection Checklist and Daily Operating Sheets (No title - Day and Grave Shift).



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- In reference to the Visual Check of Combustion permit condition, it was determined that compliance was successfully demonstrated through a review of Daily Operating Sheets (No Title - Day and Grave Shift).
- In reference to the (A) Inspect air supply, clean and repair as necessary and (B) Clean and check fuel supply system, replace filters as necessary permit conditions, it was determined that compliance was successfully demonstrated through a review of (1) Monthly/Annual Safety Inspection Checklist, (2) Demand and (3) Fireside Procedure Maintenance Work Order Form.
- In reference to the (A) Tune-Ups, (B) Clean Fire-Side Surfaces and Breaching and (C) Inspect Refractory permit conditions, it was determined that compliance was successfully demonstrated through a review of (1) Monthly/Annual Safety Inspection Checklists, (2) Fireside Procedure and (3) Tune tapes.
- In a letter 15-ESQ-0037 dated February 26, 2015 the United States Department of Energy (USDOE) requested the removal of discharge point 1.4.13, E-WSCF 001 from the AOP. The engine (discharge point 1.4.13) is still in place; however, proof of administrative controls in the form of lock-out tag-out and the company-wide procedural framework were provided which alleviate Ecology's concern of unauthorized/unintended start-up of the E-WSCF 001 engine. Therefore, as per USDOE's request, the discharge point 1.4.13 E-WSCF 001 will be removed upon future AOP renewals or revisions.

If you have any questions, please contact me at daniel.heuston@ecy.wa.gov or (509) 372-7983.

Sincerely,



Daniel Heuston
Environmental Engineer 3
Nuclear Waste Program

js
Enclosure

cc: See Page 3

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cc electronic:

David Bartus, EPA
Donald Dossett, EPA
Doug Hardesty, EPA
Jim McAuley, EPA
Dennis Bowser, USDOE-ORP
Eric Faust, DOE-RL
Reed Kaldor, MSA
Jon Perry, MSA
Matthew Barnett, PNNL
Ken Niles, ODOE
John Martell, WDOH
Lilyann Bauder, Ecology
Philip Gent, Ecology
Daniel Heuston, Ecology
Ron Skinnarland, Ecology
Environmental Portal
Hanford Facility Operating Record
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control

cc w/enc.:

Robin Priddy, BCAA
Steve Hudson, HAB
Administrative Record
Central File

cc w/o enc.:

Rodney Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN

Table 1: Inspection Results

Discharge Point	Condition	Required Records	Records Reviewed	Action Items/Recommendations
1.4.1 234-5Z, Boiler 1, 2 and 3	20% Opacity	Visible Emissions Observations	Monthly/Annual Safety Inspection Checklist	Compliance demonstrated
	Fuel Use	Vendor Certification	Vendor and Operator Certification Letter	Compliance demonstrated
	NO _x	Monthly records of fuel use	Monthly records of fuel use	Compliance demonstrated
	SO ₂	Monthly records of fuel use	Monthly records of fuel use	Compliance demonstrated
	CO	Monthly records of fuel use	Monthly records of fuel use	Compliance demonstrated
	PM ₁₀	Monthly records of fuel use	Monthly records of fuel use	Compliance demonstrated
	VOC	Monthly records of fuel use	Monthly records of fuel use	Compliance demonstrated
	(A) Burners, (B) Boiler Exterior, (C) Combustion Controls, (D) Leaks, (E) Unusual Noise, Vibrations	Records of Inspection	(1) Monthly/Annual Safety Inspection Checklist & (2) Daily Operating Sheets (No title - Day and Grave Shift)	Compliance demonstrated
	Visual Check of Combustion	Records of operating data	Daily Operating Sheets (No Title - Day and Grave Shift)	Compliance demonstrated
	(A) Inspect air supply, clean and repair as necessary (B) Clean and check fuel supply system, replace filters as necessary	Records of Inspection and Work Performed	(1) Monthly/Annual Safety Inspection Checklist & (2) Demand (3) Fireside Procedure Maintenance Work Order Form	Compliance demonstrated
(A) Tune-Ups (B) Clean Fire-Side Surfaces and Breaching & (C) Inspect Refractory	Section 2.5	(1) Monthly/Annual Safety Inspection Checklist & (2) Fireside Procedure (3) Tune tapes	Compliance demonstrated	

Discharge Point	Condition	Required Records	Records Reviewed	Action Items/Recommendations
1.4.2 242-A, Boiler 1, 2 and 3	20% Opacity	Visible Emissions Observations	Monthly/Annual Safety Inspection Checklist	Compliance demonstrated
	Fuel Use	Vendor Certification	Vendor and Operator Certification Letter	Compliance demonstrated
	NO _x	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	SO ₂	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	CO	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	PM ₁₀	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	VOC	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	(A) Burners, (B) Boiler Exterior, (C) Combustion Controls, (D) Leaks, (E) Unusual Noise, Vibrations	Records of Inspection	(1) Monthly/Annual Safety Inspection Checklist & (2) Daily Operating Sheets (No title - Day and Grave Shift) (3) Demand Maintenance Work Order Form	Compliance demonstrated
	Visual Check of Combustion	Records of operating data	Daily Operating Sheets (No Title - Day and Grave Shift)	Compliance demonstrated
	(A) Inspect air supply, clean and repair as necessary (B) Clean and check fuel supply system, replace filters as necessary	Records of Inspection and Work Performed	(1) Monthly/Annual Safety Inspection Checklist & (2) Demand Maintenance Work Order Form (3) Fireside Procedure	Compliance demonstrated
	(A) Tune-Ups (B) Clean Fire-Side Surfaces and Breaching & (C) Inspect Refractory	Section 2.5	(1) Monthly/Annual Safety Inspection Checklist & (2) Fireside Procedure (3) Tune tapes	Compliance demonstrated

Discharge Point	Condition	Required Records	Records Reviewed	Action Items/Recommendations
1.4.9 Portable Boiler	NO _x	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	SO ₂	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	CO	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	PM10	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
	VOC	Monthly records of fuel use	Boiler Fuel Use FY 2015-2016	Compliance demonstrated
1.4.13 E-WSCF 001			(1) Lock-out Tag-out photos and (2) company-wide procedural framework	E-WSCF 001 will be removed upon future AOP revisions or renewals