



1240958

[0074322H]

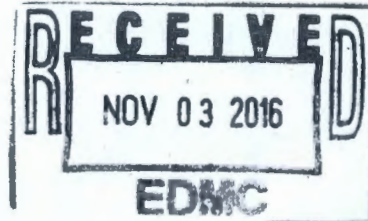
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

November 1, 2016

16-NWP-189

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 Point 1.4.20,
P-2706T 001 (T Plant)

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 performed on August 30, 2016, of AOP discharge point 1.4.20, P-2706T 001 (T Plant) by Ecology. Compliance with applicable conditions of AOP 00-05-06 Renewal 2, Revision B and NOC Approval Order DE01NWP-002 Revision 1 was the basis of the inspection. Records were reviewed for time periods January 1, 2015 to August 30, 2016.

Ecology finds specific conditions in Attachment 1 of the AOP 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 Approval Condition 1.3.1 of Approval Order DE01NWP-002 Revision 1, it was determined that compliance for Visible Emissions was successfully demonstrated through a review of HEPA Filter Service Records and Certificate of Conformance which indicates that the HEPA filters are maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions (Tier 3 Visible Emission Survey requirements).
- In reference to Approval Condition 1.3.2 of Approval Order DE01NWP-002 Revision 1, compliance for Visible Emissions is also to be demonstrated by performing an Opacity determination with subsequent submission of Visible Emission Surveys in the event that Visible Emissions are observed. However, since Visible Emissions results are not positively or negatively identified in records it is unclear if this condition is fully met.



Mr. Doug Shoop
November 1, 2016
Page 2 of 3


16-NWP-189

The Visual Emissions opacity determination is intended to provide additional proof of HEPA filter functionality. Therefore, it is recommended that the presence of Visible Emissions be positively or negatively identified in future records when they are performed.

- In reference to Approval Condition 1.3.3 and 1.3.4 of Approval Order DE01NWP-002 Revision 1, compliance for TAPs and VOCs will be demonstrated by material assessment, inventory, and calculations (results of analysis). It was determined that conditions for TAPs and VOCs were successfully demonstrated through a review of Criteria and Toxics Air Pollutants Air Emission Inventories, Container Venting Tracking Data Sheet, and Operations Log of Waste Container Venting Activities. Type and quantity (material assessments and inventory) of TAPs and VOCs, gathered from the SWITS database are input into the Criteria and Toxics Air Pollutants Air Emission Inventories spreadsheet. Calculations are subsequently performed to determine: (1) if off-site ambient air concentrations fall above or below respective ASILs/SQERs (2) if additional calculations or tracking needs to be performed and (3) annual emissions released.
- Also, an annual assessment entitled *Calendar Year XXXX Nonradioactive Inventory of Airborne Emissions Report*, which is "proposed" to be reported annually as per section 8.2 and 2.0 of the NOC, has not been submitted since 2005. However, air emissions inventory has since been submitted and maintained electronically through the Washington Inventory Emissions Reporting System. Therefore, it is recommended that section 8.2 of the NOC application be revised to reflect current emissions inventory reporting procedures.

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

dh/jvs
Enclosure

cc: See page 3

Mr. Doug Shoop
November 1, 2016
Page 3 of 3

16-NWP-189

cc electronic:

Dave Bartus, EPA
Donald Dossett, EPA
Dennis Faulk, EPA
Doug Hardesty, EPA
Davis Zhen, EPA
Dennis Bowser, USDOE-ORP
Eric Faust, USDOE-RL
Reed Kaldor, MSA
Jon Perry, MSA
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/o enc.:

Robin Priddy, BCAA
Rodney Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Administrative Record
Central File

Table 1: Inspection Results

Discharge Point	Condition	Required Records	Records Reviewed	Action Items/Recommendations
1.4.20 P-2706T 001	Visible Emissions	Maintenance Records	(1) HEPA Filter Service Records, (2) Certificate of Conformance	Provide positive or negative identification of Visible Emissions in future daily records.
	Emission Limits (1) VOC – 3.5 ton/yr (2) TAPS < ASIL	Results of Analysis	(1) Criteria and Toxics Air Pollutants Air Emission Inventory (2) Container Venting Tracking Data Sheet (3) Operations Log of Waste Container Venting Activities	Revise future AOP to reflect current reporting procedures with WEIRS.