



0064057

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

05-ESD-0017

MAR 9 2005

Addressees – See Attached

Dear Addressees:

DOE/RL-2005-01, HANFORD SITE AIR OPERATING PERMIT SEMIANNUAL REPORT FOR THE PERIOD JULY 1, 2004 THROUGH DECEMBER 31, 2004

Enclosed is the Hanford Site Air Operating Permit (AOP) Semiannual Report for the period July 1, 2004, through December 31, 2004. This report is certified as required by Washington Administrative Code 173-401-520. The AOP, Standard Terms and Conditions, Section 4.3.3, requires that the permittee submit a semiannual report on March 15 of each year. This transmittal satisfies that requirement. 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

RECEIVED
MAR 17 2005

EDMC

Enclosure

cc w/encl:

Environmental Portal, A3-01

Administrative Record (file: Hanford Air Operating Permit-CY 2005)

B. P. Atencio, PNNL

D. J. Carrell, CH2M

S. L. Clark, WDOH

G. Bohnee, NPT

B. L. Curn, BNI

L. P. Diediker, FHI

R. H. Engelmann, FHI

W. E. Green, FHI

R. H. Gurske, FHI

R. Jim, YN

R. J. Landon, BHI

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

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

J. Van Pelt, CTUIR

O. S. Wang, Ecology

S. M. Wells, CH2M

P. A. Weiher, JCI

J. G. Woolard, BHI

D. Zhen, EPA Region 10 (Seattle, WA)

Addressees – Letter dated: MAR - 9 2005
05-ESD-0017

Mr. Allen W. Conklin, Supervisor
Air Emissions and Defense Waste Section
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504

Mr. Ron Kreizenbeck, Acting Regional Administrator
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1200 6th Avenue
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Dr. David A. Lauer, Control Officer
Benton Clean Air Authority
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Mr. Michael A. Wilson, Program Manager
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Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

EXECUTIVE SUMMARY

AIR OPERATING PERMIT SEMIANNUAL REPORT FOR THE PERIOD JULY 1, 2004 THROUGH DECEMBER 31, 2004

STATEMENT OF NEED

- The Hanford Site Air Operating Permit (AOP) became effective on July 2, 2001. One condition contained in the AOP is the requirement to submit semiannual reports by March 15th and September 15th each year, which are certified for truth, accuracy, and completeness by a Responsible Official.
- The semiannual report is an FH Environmental Compliance Program deliverable that was delivered to RL on February 14, 2005. The deliverable integrates certified input from FHI, BHI, BNI, CH2M, JCI, PNNL, and R. H. Smith Distributing Co., Inc. (operator of the 600 Area CONOCO Refueling Station)..

BACKGROUND

- This semiannual report contains information for the period July 1, 2004 through December 31, 2004 for all affected contractors.
- The AOP is issued to the "U.S. Department of Energy - Hanford Operations" thus Responsible Official certifications from both RL and ORP are required.

REPORT CONTENT

For the applicable reporting period, AOP, "Standard Terms and Conditions", Section 4.3.3, and identifies the following:

- Each semiannual report will provide a reference to deviation reports submitted to the regulatory agencies as required by Section 4.5, "Permit Deviation Reporting".
- Each semiannual report will consist of reports of any required monitoring not submitted previously to the agencies or a reference to reports of required monitoring that were submitted during the reporting period.
- Each semiannual report will contain a summary of any substantiated air emission complaint investigation(s) required in Table 1.2 of AOP, Attachment 1, and issued during the reporting period.
- For all minor radioactive emission points (potential to emit <0.1 mrem to the maximally exposed individual) listed in AOP, Attachment 2, Tables 1.2, 1.3 and 2.1, each semiannual report will confirm that any required monitoring was conducted to verify low emissions during the reporting period. The data derived from that monitoring will be reported in the Annual National Emission Standards for Hazardous Air Pollutants (NESHAP) Report (AOP, "Standard Terms and Conditions", Section 4.3.1). The AOP requirement is for annual monitoring (e.g., four 1 week samples per year); therefore, this is intended as a status of the required monitoring. No monitoring is required if the facility/emission point did not operate during the reporting period.
- Each semiannual report will list any new regulatory orders [e.g., Notice of Construction (NOC) approvals] imposed during the reporting period by Ecology or WDOH.
- Each semiannual report will include a progress report on the compliance schedules identified in the AOP, "Standard Terms and Conditions", Section 4.8.

CONCURRENCE and CERTIFICATION

- Contractor certifications have been received from all affected Hanford Site contractors (FHI, BHI, BNI, CH2M, JCI, PNNL, and R. H. Smith Distributing (the 600 Area CONOCO station operator).
- RL's certification is specific to only those facilities under RL's control.

RECOMMENDATION

- The semiannual report is ready for certification.