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# Hanford Site Title V Air Operating Permit Implementation Plan

Prepared for the U.S. Department of Energy  
Assistant Secretary for Environmental Management

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**United States  
Department of Energy**  
P.O. Box 550  
Richland, Washington 99352

Project Hanford Management Contractor for the  
U.S. Department of Energy under Contract DE-AC06-96RL13200

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(Upon receipt of Clearance approval)  
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*Chris Stillingham* 9/9/03  
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## HANFORD SITE TITLE V AIR OPERATING PERMIT IMPLEMENTATION PLAN

### PREFACE

This revised Implementation Plan is provided to guide U.S. Department of Energy, Richland Operations Office, U.S. Department of Energy, Office of River Protection, and the Hanford Site contractors in fulfilling the requirements of the Hanford Site Title V Air Operating Permit 00-05-006. This is a high-level document not intended to replace facility-specific compliance instructions, directions, or procedures. This document provides the process to reasonably ensure compliance from a sitewide perspective with the Air Operating Permit terms and conditions. Site contractors are responsible for complying with the Air Operating Permit terms and conditions specific to the facilities under their control. Several of the requirements are new and this Implementation Plan concentrates on providing the sitewide processes necessary to consistently fulfill these new requirements according to the schedules in the Air Operating Permit.

The Air Operating Permit and additional supporting and associated documentation (including this Implementation Plan) can be viewed or downloaded in several formats from the intranet site using standard internet browser software. The Intranet address for this information is <http://apweb02.rl.gov/aop/index.cfm>.

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## ACRONYMS

ALARACT	as low as reasonably achievable control technology
AOP	Air Operating Permit (Hanford Site)
BARCT	best available radionuclide control technology
BCAA	Benton Clean Air Authority
CERCLA	<i>Comprehensive Environmental Response, Compensation, and Liability Act of 1980</i>
CFR	Code of Federal Regulations
DOE-ORP	U.S. Department of Energy, Office of River Protection
DOE-RL	U.S. Department of Energy, Richland Operations Office
Ecology	Washington State Department of Ecology
EPA	U. S. Environmental Protection Agency
ESPC	Energy Savings Performance Contract
FCAA	<i>Federal Clean Air Act as Amended in 1990</i>
HEPA	high-efficiency particulate air
IEU	insignificant emission unit
IP	implementation plan
ISMS	Integrated Environment, Safety and Health Management System
MOU	memorandum of understanding
NESHAP	National Emission Standard for Hazardous Air Pollutants
NOC	notice of construction
NOI	notification of intent
PCM	periodic confirmatory measurement
PDF	portable document format
ppm	part per million
PTRAEU	portable/temporary radioactive air emission unit
RACM	regulated asbestos-containing material
RCRA	<i>Resource Conservation and Recovery Act of 1976</i>
RMP	risk management plan
WAC	Washington Administrative Code
WDOH	Washington State Department of Health

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## DEFINITIONS

Administrative permit amendment	A permit revision that seeks to correct typographical errors, makes minor administrative changes, increases monitoring and/or reporting frequency, and addresses other similar minor changes (for a complete definition, refer to WAC 173-401-720).
AOP team	Contractor/subcontractor team selected to coordinate AOP submittals.
AOP website	An Intranet website ( <a href="http://apweb02.rl.gov/aop/index.cfm">http://apweb02.rl.gov/aop/index.cfm</a> ) containing AOP guidance, meeting minutes, regulations, specific NOC approvals, etc.
Gap-fill monitoring	Monitoring required by the AOP when the underlying applicable requirement does not require instrumental or noninstrumental monitoring sufficient to provide reliable data from the relevant period that are representative of the source's compliance with the permit [paraphrased from WAC 173-401-615(1)(b)].
Hanford Site contractors	All prime and privatized contractors and their subcontractors performing work or providing services on the Hanford Site.
Off-permit change	A change specifically not addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed change does not weaken the enforceability of existing permit conditions. Any change that is a Title I modification or is a change subject to the acid rain requirements under Title IV of the <i>Federal Clean Air Act as Amended in 1990</i> must be submitted as a permit revision (for a complete definition, refer to WAC 173-401-724).
Minor permit modification	A modification that does not violate any applicable requirement; does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit; and is not a Title 1 modification (for a complete definition refer to WAC 173-401-725).
Parametric monitoring	Various operational criteria indicative of emissions that can be monitored in lieu of direct measurements of emissions. Examples include monitoring combustion characteristics and fuel analysis to estimate sulfur dioxide (SO <sub>2</sub> ) emissions rather than directly monitoring SO <sub>2</sub> at the stack.
Periodic monitoring	For AOP purposes, periodic monitoring can include, but is not limited to, recordkeeping, source tests, record sampling, nondestructive assay, continuous emissions monitoring, and/or emission calculations.
Prime contractor	A contractor performing a Hanford Site service under direct contract to DOE-ORP or DOE-RL.

Privatized contractor	A contractor performing a specialized work activity or function under contract to DOE-ORP or DOE-RL. The ESPC contractor is an example of a privatized contractor.
Significant permit modification	A modification that does not qualify as a minor permit modification or an administrative permit amendment [for a complete definition, refer to WAC 173-401-725(4)].
Source test	An EPA or Ecology approved test method taken during normal facility operations to measure airborne emissions from an emission unit [refer to WAC 173-401-615(1)(b)].
Title I modification	<p>Any modification under Sections 111 ("Standards of Performance for New Stationary Sources") or 112 ("Hazardous Air Pollutants") of the <i>Federal Clean Air Act as Amended in 1990</i> and any physical change or change in the method of operations that is subject to the preconstruction review regulations promulgated under Parts C ("Prevention of Significant Deterioration") and D ("Plan Requirements for Nonattainment Areas") of Title I of the <i>Federal Clean Air Act</i> [WAC 173-401-200(33)].</p> <p>EPA, Region 10, has offered an opinion that the definition of a Title I modification excludes radionuclide air emissions.</p>

## 1.0 INTRODUCTION

This revised Implementation Plan (IP) describes how the U.S. Department of Energy, Richland Operations Office (DOE-RL) and the U.S. Department of Energy, Office of River Protection (DOE-ORP), the air permit holders, intend to implement the requirements of the Hanford Site Title V Air Operating Permit 00-05-006 (AOP) prepared in accordance with provisions of 40 Code of Federal Regulations (CFR) Part 70 and Washington Administrative Code (WAC) Chapter 173-401, *Operating Permit Regulation*. The AOP contains the terms and conditions set forth by the Washington State Department of Ecology (Ecology), the Washington State Department of Health (WDOH), and the Benton Clean Air Authority (BCAA).

This AOP IP reflects the Guiding Principles and Core Functions established and defined in DOE Policy 450.4, "Safety Management System Policy" and implemented by Hanford Site Contractors.

This IP also requires that DOE-RL, DOE-ORP, and Hanford Site contractor management personnel be responsible for the protection of the public by performing Hanford Site activities involving air emissions to the environment in accordance with the terms and conditions of the AOP. DOE-RL and DOE-ORP routinely report air emission results and provide certification statements signed by a responsible DOE-RL official and a responsible DOE-ORP official reflecting their compliance status. The certification statements provide traceability and responsibility to ensure the applicable regulatory agencies that DOE-RL and DOE-ORP are following the AOP.

This IP:

- is to guide DOE-RL, DOE-ORP, and the Hanford Site contractors in fulfilling the requirements of the AOP
- is a high-level document and is not intended to provide facility-specific compliance instructions, directions, or procedures
- provides a specific process for integration and consistent application of the requirements introduced by the AOP.

The AOP is issued to the U.S. Department of Energy, Hanford Operations, which is managed by DOE-RL and DOE-ORP. All AOP-required application forms, reports, or compliance certifications must be certified by a responsible official from DOE-RL and/or DOE-ORP that the submittal is true, accurate, and complete. To support a DOE-RL and/or DOE-ORP certification, Hanford Site contractors certify the information they provide.

Hanford Site contractors remain responsible for complying with the AOP terms and conditions that affect their emission points.

Major new Title V requirements specified in the AOP, plus AOP reference to existing requirements, include the following.

New AOP requirement	Existing reports referenced in AOP	AOP Section
Semiannual report of required monitoring certified by the responsible official as being true, accurate, and complete		Standard Terms and Conditions, Section 4.3.3
Annual report of the compliance status of the Hanford Site certified by the responsible official		Standard Terms and Conditions, Section 4.3.4
Gap-fill monitoring for emission units listed in the AOP		Attachment 1 (refer to AOP Attachment 1 Table 1.6 for examples.)
Periodic confirmatory measurement (PCM) requirements for certain emission units listed in the AOP		Attachment 2 (refer to NOC approvals in AOP Attachment 2 Table 2.1 for examples.)
Visible emission survey process		Attachment 1, Section 2.1
Specific processes for modifying the AOP		Implementation issue not addressed in AOP (WAC 173-401-720, 722, 724 and 725)
Certification by a responsible official		Standard Terms and Conditions, Section 4.3
Permit renewal		Standard Terms and Conditions, Section 4.1
Process for changing PCM		Attachment 2, Section 3.1
Notice of Closure (Ecology) for nonradioactive emission units that cease operation		Standard Terms and Conditions, Section 4.14 1
	Annual NESHAP report	Standard Terms and Conditions, Section 4.3.1
	Annual air emission inventory report	Standard Terms and Conditions, Section 4.3.2

## 2.0 ROLES AND RESPONSIBILITIES

Various organizations are required to perform certain roles to implement the AOP. These roles and responsibilities are discussed in the following sections.

### 2.1 RELATIONSHIP BETWEEN U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE AND U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION FOR AIR OPERATING PERMIT IMPLEMENTATION

The memorandum of agreement (DOE-RL-99-06, Appendix B) describes the relationship between DOE-RL and DOE-ORP with respect to sitewide environmental permits. Under this memorandum of agreement, the manager of DOE-RL is responsible for regulatory compliance and acts as signatory for regulatory agreements. The manager of DOE-ORP must coordinate with DOE-RL.

Formal correspondence from contractors/subcontractors of DOE-RL will be transmitted by DOE-RL to the regulatory agency. Formal correspondence from contractors/subcontractors of DOE-ORP will be transmitted by DOE-ORP to the regulatory agency.

For submittals that require certification by a responsible official per WAC 173-401-520, such as semiannual reports and the annual compliance certification, DOE-ORP will send their responsible official certification to DOE-RL. DOE-RL will transmit the submittal to the regulatory agency with a certification statement that contains two signatures, one from the DOE-ORP responsible official and one from the DOE-RL responsible official. In time-sensitive cases, DOE-ORP and DOE-RL could use a different mechanism.

### 2.2 U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE AND U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION

Duties and responsibilities are as follows:

- Provide direction to all Hanford Site prime and privatized contractors that require new source reviews, monitoring, emission reporting, permit modifications, and certification statements. The direction will be consistent with the AOP and this IP
- Provide expectations regarding the process to determine whether proposed privatized contractor activities met the definition for inclusion in the AOP. (For guidance on Ecology's evaluation criteria, refer to support AOP document, Ecology-Statement of Basis)
- Transmit correspondence to and from the regulators. This could include such items as NOC applications and approvals, audit or inspection findings, semiannual reports, compliance certifications, responses to notices of correction or violation from the regulators, and other reports referenced by the AOP
- Certify transmittals to the regulatory agencies as required by the AOP

- Provide AOP program direction to Hanford Site prime contractors and privatized contractors included in the AOP
- Fulfill the compliance schedule items identified in the AOP, "Standard Terms and Conditions", Section 4.8, and report progress accordingly.

### **2.3 PRIME AND PRIVATIZED CONTRACTORS**

Duties and responsibilities are as follows:

- Provide management overview of the coordination and integration of air emission source data under their direction to fulfill AOP requirements
- Provide AOP program direction and request funding from DOE-RL or DOE-ORP to implement the AOP program
- Provide a representative for the AOP Steering Committee
- Monitor compliance with the AOP, which includes sampling, monitoring, recordkeeping, and other AOP requirements for facilities under their management
- Draft correspondence to address regulator audit findings, notices of correction, or violations to DOE-RL or DOE-ORP for facilities under their direction
- Provide copies of NOC applications and regulatory order approvals to the contractor/subcontractor team selected to coordinate AOP submittals (AOP team)
- Support the AOP team in completing the reporting and compliance certification requirements.

### **2.4 AOP TEAM RESPONSIBILITIES**

Duties and responsibilities are as follows:

- Prepare and distribute to the contractors draft semiannual reports and draft annual compliance certification reports
- Coordinate compliance certifications and compliance submittals
- Coordinate AOP amendments, revisions, modifications, and renewals
- Represent the Hanford Site, as appropriate, with the agencies
- Coordinate meetings with the agencies
- Coordinate, schedule, and chair the AOP Steering Committee
- Coordinate development of AOP compliance strategies

- Coordinate AOP-related document reviews
- Maintain the AOP database and website.

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### 3.0 OVERVIEW OF COMPLIANCE REQUIREMENTS

The *Federal Clean Air Act Amendment of 1990* required that the EPA develop a national AOP program, which in turn, required each state to develop an AOP program to identify major stationary sources of regulated pollutants. The EPA responded by promulgating 40 CFR 70 in July 1992. The EPA granted interim approval of the Washington State Air "Operating Permit Regulation" Program consistent with the requirements of Title V of the *Federal Clean Air Act* in November 1994. Washington State's Air Operating Program (promulgated as WAC 173-401) became effective in December 1994. The Hanford Site was determined to be a major emission source and was required to submit an AOP application by June 7, 1995.

DOE-RL submitted an initial AOP application to Ecology on May 26, 1995 (DOE/RL-95-07), in accordance with the requirements of WAC 173-401, "Operating Permit Program". A requirement of WAC 173-401 was to keep applications current and accurate before issuance of a draft AOP by Ecology. From May 1995 to June 2000, DOE-RL submitted six amendments to the AOP application and one AOP application supplement to maintain the application in a current and accurate condition before issuance of the draft permit.

The primary regulations and requirements included in the AOP are WAC 173-400, "General Regulations For Air Pollution Sources", WAC 173-401, "Operating Permit Regulation"; WAC 173-460, "Controls For New Sources Of Toxic Air Pollutants", WAC 246-247, "Radiation Protection - Air Emissions", and 40 CFR 61, Subpart H, "National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities". The AOP issued by Ecology follows the permit content section of WAC 173-401, Part VI.

A memorandum of understanding (MOU) describing the enforcement relationship and responsibilities of Ecology and WDOH was signed in December 1993 (refer to AOP, Ecology-Statement of Basis). The MOU identified Ecology as the lead agency for preparation and enforcement of the terms and conditions of the AOP. The WDOH was identified in the MOU as the agency responsible for the enforcement of Hanford Site radioactive emissions. In March 1994, Ecology delegated the regulation and enforcement of Washington State's regulation of open burning and asbestos to the Benton Clean Air Authority (BCAA). The EPA enforces the federal asbestos requirements.

Ecology is the lead agency for enforcement of "Attachment 1" of the AOP. The WDOH is responsible for enforcement of "Attachment 2" of the AOP, and the BCAA has enforcement authority for the state asbestos and open burning regulations as indicated in "Attachment 3". Ecology, and WDOH jointly enforce the "Standard Terms and Conditions" portion. The EPA currently retains enforcement authority for, "The Federal Facility Compliance Agreement for the Radionuclide National Emission Standards for Hazardous Air Pollutants (NESHAP)".

#### 3.1 SECTIONS COMMON TO WASHINGTON STATE DEPARTMENT OF ECOLOGY, WASHINGTON STATE DEPARTMENT OF HEALTH, AND BENTON CLEAN AIR AUTHORITY

The AOP contains "Standard Terms and Conditions" (Section 3.0) that identify regulatory requirements applicable to any Title V AOP as quoted from WAC 173-401-620. The AOP also contains "General Conditions" (Section 4.0) that identify permit requirements unique to DOE on the Hanford Site.

## 3.2 EMISSION UNIT-SPECIFIC AIR OPERATING PERMIT REQUIREMENTS

The AOP requirements for nonradioactive emissions are included in Attachment 1 and Attachment 3. Requirements for radioactive emissions are included in Attachment 2. Hanford Site contractors assess each of their listed air emission points for compliance with the AOP conditions included in the Ecology and WDOH emission tables. Compliance with these conditions is expected to be continuous.

### 3.2.1 Nonradioactive Emissions

Nonradioactive air emission units are and will be operated in accordance with the AOP, Attachment 1, Tables 1.2 through 1.7 and Sections 2.0 and 3.0 and Attachment 3 for asbestos and open burning.

Table 1.2, *General Standards for Maximum Emissions*, applies to all air emission units on the Hanford Site. Additional subtier emission tables (Table 1.4 through Table 1.7) identify permit conditions unique to the type of emission source in addition to the general standard requirements of Table 1.2. The periodic monitoring, testing, recordkeeping, or reporting requirements listed in Table 1.2 are not required for insignificant emission units (IEU). Only those emission units listed in the AOP, Attachment 1, are subject to Table 1.2 monitoring, testing, recordkeeping, and reporting requirements. All other emission units are considered to be IEUs.

Table 1.3, *Emission Limits and Periodic Monitoring Requirements For Steam Generating Units Installed Under ESPC Contract*, identifies the permit conditions for steam generating units installed under the Energy Savings Performance Contract (ESPC).

Table 1.4, *Internal Combustion Engines: 500 Horsepower and Greater*, identifies the permit conditions for internal combustion engines 500 horsepower and greater.

Table 1.5, *Process and Emission Units Exceeding Insignificant Emission Threshold Excluding Combustion Processes*, identifies the permit conditions for emission units that exceed the regulatory threshold excluding combustion processes.

Table 1.6, *Emission Limits and Periodic Monitoring Requirements For Emission Limits With NOC Approval Conditions*, identifies permit conditions associated with specific NOC regulatory order approvals not included in Tables 1.3, 1.4, 1.5, or 1.7.

Table 1.7, *Miscellaneous Emission Units*, identifies permit conditions associated with emission units not included in Tables 1.3 through 1.6.

Section 2.0, *Compliance and Periodic Monitoring Provisions*, explains the monitoring provisions required for compliance with the general standards of WAC 173-400-040(1 through 8).

Section 3.0, *Recordkeeping and Compliance Calculation Models*, identifies the recordkeeping and compliance demonstration methods for emission units listed in the AOP, Attachment 1. The calculation models are used as required by AOP Attachment 1, Table 1.6, to determine compliance with specified emission limits.

Attachment 3 applies to all asbestos removal or demolition activities and open burning on the Hanford Site.

### 3.2.2 Radioactive Emissions

Radioactive air emission control equipment is and will be installed and operated in accordance with the AOP, Attachment 2, Tables 1.1 through 1.3 and Table 2.1.

Table 1.1, *Requirements for Major Point Sources*, identifies specific best available radionuclide control technology (BARCT) and as low as reasonably achievable control technology (ALARACT) requirements for NESHAP designated stacks having an offsite dose potential of equal to or greater than 0.1 mrem per year. Table 1.1 also identifies the specific emission control device (i.e., referred to as abatement control technology in the AOP), the minimum number of units required, monitoring constituents and frequency, and specific regulatory order (e.g., NOC approval) requirements. These emission point sources are and will be monitored continuously.

Table 1.2, *Requirements for Minor (nondesignated) Point Sources*, identifies specific BARCT and ALARACT requirements for minor stacks having an offsite dose potential of less than 0.1 mrem per year. Table 1.2, as applicable, also identifies the specific emission control device (i.e., referred to as abatement control technology in the AOP), the minimum number of units required, monitoring constituents and frequency, and specific regulatory order (e.g., NOC approval) requirements. The PCM of these minor emission point sources is and will be performed in accordance with Table 1.2.

Table 1.3, *Requirements for Non-Point Sources*, identifies specific regulatory order (e.g., NOC approval) requirements for non-point sources of radioactive air emissions.

Table 2.1, *Requirements for Minor Passively Ventilated (nondesignated) Vents In High Level Waste Tank Farms*, identifies the applicable standard as ALARACT and the emission control device required for Hanford Site single-shell high-level waste tanks. Table 2.1 also identifies the PCM requirement.

From time-to-time, additional requirements resulting from AOP modifications may be appended to the AOP. These will be incorporated into the appropriate table when AOP, Attachment 2 is revised.

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## 4.0 TITLE V COMPLIANCE SCHEDULE

The AOP identifies the 1994 *Federal Facility Compliance Agreement* between the EPA and DOE-RL. This agreement is included in the AOP as an applicable requirement with a compliance schedule. The compliance schedule requires that the existing *Federal Facility Compliance Agreement* continues to bring certain existing stacks into compliance with 40 CFR 61, Subpart H. This specific compliance item is listed in the AOP, Section 4.8, "Compliance Schedules".

### 4.1 RISK MANAGEMENT PLAN

The need to prepare a risk management plan (RMP) was evaluated during 1999 for all Hanford Site facilities. Based on that sitewide evaluation, a determination was made that the 283-W Water Treatment Facility, which stores chlorine in excess of the regulatory threshold, was the only Hanford Site facility subject to 40 CFR 68. A RMP for the 283-W Water Treatment Facility was prepared and submitted by June 21, 1999 as required (DOE-RL 1999).

As part of the AOP-required annual compliance certification, the Hanford Site contractor responsible for the 283-W Water Treatment Facility, needs to verify continued compliance with 40 CFR 68 ["(ii) As part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of this part, including the registration and submission of the RMP"] [40 CFR 68.215(a)(2)(ii)].

Hanford Site contractors will evaluate all facilities for which they are responsible for the presence of a regulated substance above the threshold [40 CFR 68.190(b)(4)], and will prepare and submit a RMP on the date the threshold is exceeded [40 CFR 68.10(a)(3)].

In addition, all Hanford Site contractors having responsibility for facilities other than the 283-W Water Treatment Facility will evaluate their facilities for the presence of a newly regulated (i.e., newly regulated since the last evaluation) substance above the threshold. A RMP must be prepared and submitted within 3 years after the date on which a newly regulated substance, present above a threshold quantity, is first listed under 40 CFR 68.130 [40 CFR 68.10(a)(2)].

There are some additional and different requirements of 40 CFR 68 that affect the 283-W Water Treatment Facility. The Hanford Site contractor with responsibility for 283-W Water Treatment Facility will need to address these in their facility-specific implementing procedure(s).

### 4.2 PROGRESS REPORTS

Progress in meeting the compliance schedule dates will be reported semiannually by DOE-RL in accordance with the reporting requirements of this IP, Section 7.3, "Air Operating Permit Semiannual Report". All Hanford Site contractors will provide progress reports to DOE-RL and DOE-ORP, as appropriate, with a copy to AOP team according to the semiannual report schedule.

### 4.3 REPORT SCHEDULE

Reports required by the AOP and the due dates are as follows.

Report name	AOP section	Description of report	Date due to regulatory agency
Radionuclide air emission report for the Hanford Site	Standard Terms and Conditions, Section 4.3.1	This is an existing report required by 40 CFR 61.94 and WAC 246-247-080 documenting radionuclide air emissions from the Hanford Site.	June 30
Annual air emissions inventory	Standard Terms and Conditions, Section 4.3.2	This is an existing report required by WAC 173-400-105 documenting nonradionuclide air emissions from the Hanford Site.	Within 105 days after the end of the calendar year
Semiannual report	Standard Terms and Conditions, Section 4.3.3	This is a new report required by WAC 173-401-615(3)(a) that contains reports of any required monitoring, all instances of deviations from permit requirements, plus other information.	March 15 and September 15
Annual compliance certification	Standard Terms and Conditions, Section 4.3.4	This is a new report required by WAC 173-401-630(5) that identifies each term or condition of the permit that is the basis of the certification, the compliance status, whether compliance was continuous or intermittent, and the method(s) used for determining the compliance status.	July 1
Quarterly NESHAP report	Standard Terms and Conditions, Section 4.8	This report is required by the <i>Federal Facility Compliance Agreement</i> and indicates compliance or noncompliance with the <i>Federal Facility Compliance Agreement</i> schedule.	By Friday of the first full week of the second month following the end of the calendar quarter

## 5.0 MONITORING

Periodic and continuous monitoring is required by the AOP to demonstrate compliance with regulatory requirements, emission limits, or work practice standards.

Monitoring of radionuclide and nonradionuclide air emission sources is and will be performed according to the requirements of the AOP. Monitoring is intended to demonstrate compliance, and is essential for the completion of the annual compliance certification discussed in this IP, Section 7.4. Figure 1 provides an overview of the monitoring and reporting process.

### 5.1 NONRADIOACTIVE AIR EMISSIONS

One of the new requirements of the Title V program is to add monitoring when the underlying regulatory order specifically does not include monitoring sufficient to ensure compliance. This is known as gap-fill monitoring (i.e., monitoring that fills the gap between what the regulatory order required and what is required to ensure compliance). These gap-fill monitoring requirements appear in tables throughout Attachment 1 of the AOP. Non-measurement methods (e.g., recordkeeping and/or emission calculations) can be used in lieu of direct emissions monitoring to fulfill this requirement [WAC 173-401-615(b)].

Monitoring requirements identified in the AOP include source tests, parametric monitoring (e.g., fuel analysis or combustion characteristics), recordkeeping (operation logs, chemical inventories, fuel usage), maintenance of high-efficiency particulate air (HEPA) filters to control opacity emissions, operator opacity observations, and complaint responses. The AOP identifies the minimum frequency for conducting the monitoring.

Monitoring and associated recordkeeping is not required for any emission unit that did not operate at any time between required monitoring events (AOP, "Standard Terms and Conditions", Section 4.14) provided the following conditions are met.

- In the case of a permanent shut down of the emission unit:
  1. The permittee makes a contemporaneous record in a log or file maintained onsite of the date and time that the emission unit ceased operation.
  2. The permittee will provide written notice to Ecology within a reasonable time.
- In the case of a temporary shut down of the emission unit:
  1. The permittee makes a contemporaneous record in a log or file maintained onsite of the date and time that the emission unit ceased operation and the reason why the emission unit did not operate.
  2. The permittee makes a contemporaneous record in a log or file maintained onsite of the date and time that the emission unit resumed operation.
  3. The periodic report of monitoring required by Standard Terms and Conditions Section 4.3.3, "Semiannual Reports", and/or the specific permit condition include a summary of the period or periods when the emission unit did not operate.

## **5.2 COMPLIANCE WITH THE GENERAL STANDARDS FOR MAXIMUM AIR EMISSIONS [WAC 173-400-040]**

The general emissions standards for maximum emissions contained in WAC 173-400-040(1 through 8) and the AOP, Attachment 1, Table 1.2, are applicable to every emission source unless there is a source specific approval condition for the same parameter. These standards address visible emissions (opacity), fallout, fugitive emissions, odors, emissions detrimental to persons or property, sulfur dioxide, concealment and masking, and fugitive dust. Note that emissions passing through a stack (i.e., point sources) are not sources of fugitive emissions [WAC 173-400-030(32)] or fugitive dust [WAC 173-400-030(31)].

There is a class of emission units or activities that is deemed insignificant for purposes of the AOP based on the size or production rate (WAC 173-401-533), potential to emit (WAC 173-401-531), or because the units categorically are exempt (WAC 173-401-532). Compliance with the general standards is required for IEUs. However, compliance with the periodic monitoring, testing, recordkeeping, or reporting requirements is not required. Also the compliance certification is not required for IEUs.

Emission units listed in the AOP, Attachment 2, subject to 40 CFR 61, Subpart H, that also do not appear in the AOP, Attachment 1, have been determined to represent insignificant sources of nonradioactive regulated air pollutants and are considered to be IEUs. For these emission units, no additional monitoring, reporting, or recordkeeping is necessary to determine compliance with the general standards. These emission units need not be listed individually in the annual compliance certification unless there were observed, documented, or known instances of non-compliance during the certification period. All requirements identified in the AOP, Attachment 2, for these emission units or activities continue to apply, as well as the requirement to annually certify compliance to any applicable requirements identified in the AOP, Attachment 2.

Compliance with the general standards for maximum emissions [WAC 173-400-040(1 through 8)], with the exception of sulfur dioxide [WAC 173-400-040(6)] and opacity [WAC 173-400-040(1)], is complaint driven. If no complaints are forwarded by the agency, compliance is assumed.

### **5.2.1 Periodic Monitoring for Visible Emissions [WAC 173-400-040(1)]**

According to the AOP, Attachment 1, Section 2.1, visible emission surveys must be conducted during daylight hours and during periods when the emission unit is operating. Only emission units listed in the AOP, Attachment 1, Table 1.1, are subject to visible emission monitoring.

Tier 1: This method applies primarily to fossil-fuel combustion units and other emission units that might be a source of visible emissions. The method consists of operating personnel observing visible emissions from the emission unit according to the frequency identified in the AOP, Attachment 1, Tables 1.2 through 1.6 and as described in Attachment 1, Section 2.0, "Compliance and Periodic Monitoring Provisions". If the operator observes visible emissions for more than 10 consecutive minutes during the observation period, the cause(s) of the visible emissions will be determined and corrective actions taken, as necessary, or a visible determination of opacity will be performed using EPA Method 9. Records of corrective actions taken to reduce opacity will be maintained by the responsible Hanford Site contractor and will be available for Ecology inspection. Visible emission surveys are to be conducted during daylight hours and after the unit has reached normal operating temperatures and revolutions per minute or 15 minutes after startup.

If after corrective actions have been taken and results from the EPA Method 9 indicate visible emissions in excess of the limit, promptly file a deviation report with Ecology as required by AOP Standard Terms

and Conditions Section 4.5. Continued operation of the unit will put the facility at risk of incurring an agency enforcement action. According to AOP, Standard Terms and Conditions, Section 3.2 "Need to Halt or Reduce Activity Not a Defense", " It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [WAC 173-401-620(2)(b)]."

Tier 2: Some emission units are unlikely sources of visible emissions and are not expected to exceed the applicable opacity limit based on past operating experience and/or expected process behavior. These emission units include research and development laboratories, analytical laboratories, and small natural gas-fired boilers. For these emission units, surveillance is conducted by the Hanford Site contractor(s) responsible for the emission units and the results recorded. If visible emissions from one of these emission units are observed for more than 10 consecutive minutes, the Hanford Site contractor responsible for the emission unit will attempt to identify the cause(s) of the visible emissions and record results. The recorded entry also will identify any corrective actions taken and the likely frequency of a future re-occurrence. If the event is likely to be re-occurring, and can not be demonstrated to consist of water vapor, a determination of opacity will be made using EPA Method 9. Where no frequency is specified, visible emission surveys will be performed yearly.

The frequency of the visible emission surveys will be as required in the AOP, Attachment 1, Tables 1.2 through 1.6, unless the following process has been completed satisfactorily by the Hanford Site contractor responsible for the emission unit.

#### Process for Reducing Visible Emission Survey Frequencies:

If weekly visible emission surveys for 3 months are negative, quarterly measurements will be taken for the next 6 months. After 9 months of no visible emissions, visible emission surveys will be performed only when visible emissions are observed or expected (e.g., during startup, shutdown, or periods of malfunction). Visible emission surveys during these periods will be conducted for nonradionuclide-emitting stacks according to the process described in Tier 2.

Tier 3: The Hanford Site contractor(s) responsible for emission units having HEPA filtration will maintain abatement control technology as required in the AOP, Attachment 2, Tables 1.1, 1.2, and 2.1, for that particular emission unit. No visible emissions observations are required.

In the event the affected Hanford Site contractor chooses to verify that visible emissions are below 20%, a qualified observer certified to perform opacity checks could be used in accordance with EPA Method 9. Records from the qualified observer will be maintained by the Hanford Site contractor, or their succeeding contractor, for 5 years from the date of the opacity check.

At present, Hanford Site contractors are not required to perform opacity checks for IEUs, nor are the contractors required to monitor, report, or maintain records on IEUs.

All Hanford Site contractors are encouraged to document visible emission observations on the form provided as Figure 2.

### 5.2.2 Periodic Monitoring for Sulfur Dioxide [WAC 173-400-040(6)]

The sulfur dioxide standard [WAC 173-400-040(6)] prohibits emission of a gas containing sulfur dioxide from any emission unit in excess of 1,000 parts per million (ppm) on a dry basis, corrected to 7% oxygen for combustion sources, and based on an average duration of any 60 consecutive minute period. Only emission units listed in the AOP, Attachment 1, are subject to the sulfur dioxide monitoring requirement.

For combustion units equal to or greater than 500 horsepower operating within the previously stated limits, documentation that fuel used contains 0.5% sulfur or less is considered adequate to demonstrate continuous compliance with this standard.

For fuel-oil fired combustion units having a more restrictive sulfur limit identified in the AOP, Attachment 1, Table 1.6, documentation requirements are specified in the AOP, Attachment 1, Section 2.7, "Compliance & Periodic Monitoring Provisions". No additional monitoring is required.

For noncombustion units that do not have a more restrictive limit in the AOP, Attachment 1, Table 1.6, annual certification that the process has not been modified to increase sulfur dioxide emissions is considered as compliance with this standard. No additional monitoring is required.

The Hanford Site contractor(s) responsible for the emission unit(s) will maintain the periodic monitoring documentation.

### **5.2.3 Fallout, Odor, Emissions Detrimental To Persons or Property, and Concealment and Masking [WAC 173-400-040(2, 5, and 7)]**

Complaints could surface from a number of different sources on or off the Hanford Site. To control the validity of complaints received from onsite or offsite, the Hanford Site AOP requires that only complaints received through Ecology are subject to these requirements. However, Hanford Site contractors are not precluded from responding to and resolving complaints that are brought directly to their attention, whether or not the complaint is ever forwarded by Ecology.

Any complaints regarding fallout [WAC 173-400-040(2)], emissions detrimental to persons or property [WAC 173-400-040(5)], or concealment and masking [WAC 173-400-040(7)] will be forwarded to DOE-RL by Ecology. DOE-RL, with Hanford Site contractor support, promptly will address the complaint and identify any planned corrective actions. DOE-RL, with Hanford Site contractor support, will provide an initial informal response to Ecology within 30 days of receipt of the complaint with the results of the complaint investigation and any planned or completed corrective actions. DOE-RL, with Hanford Site contractor support, will provide Ecology with any requested follow-up report(s). The AOP team and a responsible Hanford site contractor, where one can be determined, will maintain records of the complaints for a period of 5 years from the date of the complaint.

The Figure 3 form will be used by all Hanford Site contractors to document complaints and corrective actions.

### **5.2.4 Source Tests**

The AOP identifies EPA or Ecology approved test methods in the 'Test Method' column of the AOP, Attachment 1, Tables 1.2 through 1.6. These tests are specific to a particular pollutant or class of pollutants. Often these test methods are required as part of a NOC requirement with a frequency specified. The NOC also could require that the test results be submitted to the agency on completion of the test. When the 'Test Method' column does not identify a frequency, the listed test method will be included only to identify the appropriate test method to be used as a compliance verification tool, should a test be requested by a regulator. The Hanford Site contractor responsible for the particular emission unit also is responsible for complying with any testing requirements.

The following tables, located in the AOP, Attachment 1, identify the periodic monitoring requirements:

- Table 1.2 - *General Standards For Maximum Emissions*
- Table 1.3 - *Emission Limits and Periodic Monitoring Requirements For Steam Generating Units Installed Under ESPC*
- Table 1.4 - *Internal Combustion Engines: 500 Horsepower and Greater*
- Table 1.5 - *Processes And Emission Units Exceeding Insignificant Emission Unit Threshold (Excluding Combustion Processes)*
- Table 1.6 - *Emission Limits and Periodic Monitoring Requirements For Emission Units With NOC Approval*
- Table 1.7 - *Miscellaneous Emission Units.*

### 5.3 RADIOACTIVE AIR EMISSIONS

The following tables, located in the AOP, Attachment 2, identify the radioactive air emissions monitoring requirements.

Table 1.1, *Requirements for Major Point Sources*, identifies specific BARCT and ALARACT requirements for NESHAP designated stacks (i.e., stacks having an offsite dose potential of equal to or greater than 0.1 mrem per year). Table 1.1 also identifies the specific emission control device (referred to as abatement control technology in the AOP), the minimum number of units required, monitoring constituents and frequency, and specific regulatory order (e.g., NOC approval) requirements. These emission point sources are and will be monitored continuously unless an alternative agreement has been approved by the EPA and WDOH.

Table 1.2, *Requirements for Minor (non-designated) Point Sources*, identifies specific BARCT and ALARACT requirements for minor stacks having an offsite dose potential of less than 0.1 mrem per year. Table 1.2 also identifies the specific emission control device (referred to as abatement control technology in the AOP), the minimum number of units required, monitoring constituents and frequency, and specific regulatory order (e.g., NOC approval) requirements. The PCM requirements for these minor emission point sources are and will be performed in accordance with Table 1.2.

Table 1.3, *Requirements for Non-Point Sources*, identifies specific regulatory order (e.g., NOC approval) requirements for non-point sources of radioactive air emissions.

Table 2.1, *Requirements for Minor Passively Ventilated (nondesignated) Vents In High-Level Waste Tank Farms*, identifies the applicable standard as ALARACT and the emission control device required for Hanford Site single-shell high-level waste tanks. Table 2.1 also identifies the PCM requirement.

Additional requirements from AOP modifications could be appended to the AOP pending incorporation into the appropriate table.

Monitoring and associated recordkeeping is not required for any emission unit that did not operate at any time between required monitoring events (e.g., if the monitoring requires continuous sampling, such

readings would not be required on any full day in which the emission unit did not operate), provided the following conditions are met. In the case of a permanent shut down of the emission unit:

- The licensee completes the monitoring and associated recordkeeping for that period before the shutdown.
- The licensee files a report of closure with WDOH in accordance with WAC 246-247-080(6). An emission unit will not be considered to be shut down permanently or completed until a report of closure is received by WDOH.

Note: These conditions do not apply to temporary radioactive emissions units (e.g., HEPA vacuums or PTRAEUs, etc).

### 5.3.1 Compliance Assurance for Legacy Sources

AOP, Attachment 2, Section 3.2, requires that the licensee establish methods to ensure compliance for newly discovered sources of radioactive air emissions from legacy operations on the Hanford Site. Within a reasonable timeframe<sup>1</sup> after a Hanford Site contractor discovers any potential passively ventilated point sources of radioactive airborne emissions not listed in the AOP, Attachment 2, the responsible contractor will propose emission monitoring, recordkeeping, and reporting requirements to DOE-RL or DOE-ORP for transmittal to WDOH as an AOP administrative amendment. [Note that the administrative amendment process (WAC 173-401-720) requires the permitting authority to incorporate any requested amendments into the AOP (i.e., revise the permit).]

According to the AOP, WDOH Statement of Basis, the sitewide ambient air monitoring program fulfills the PCM requirement for legacy diffuse or passively ventilated sources of emissions. Additionally, the annual radionuclide air emissions report for the Hanford Site satisfies the reporting requirements. Therefore, it appears that WDOH would consider ambient air monitoring as appropriate monitoring and the annual radionuclide air emissions report as appropriate reporting and recordkeeping.

### 5.3.2 Periodic Confirmatory Measurement Changes

The PCM change process for minor stacks emitting radionuclides (Figures 4a and 4b) will be followed to select an approved alternate monitoring scenario. Hanford Site contractors will follow their established communication protocol when advising WDOH of a new alternate monitoring method before making the PCM change. As noted in Figure 4a, if WDOH has not responded within 7 days from receipt of the contractor notification, the change to the new method can be implemented.

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<sup>1</sup> Includes time to evaluate the legacy source.

## 6.0 RECORDKEEPING

Each Hanford Site contractor having air emission sources under their control and contained in the AOP will maintain records of all required monitoring data and support information.

### 6.1 RECORDS OF NONRADIOACTIVE EMISSIONS

Results of required periodic monitoring will be maintained by the responsible contractors. Support records include calibration and maintenance records for continuous monitoring instrumentation. When recordkeeping is the required periodic monitoring method, those specific records that must be maintained are identified in AOP, Attachment 1, Table 1.6, *Emission Limits and Periodic Monitoring Requirements for Emission Units with NOC Approval Conditions*. Compliance calculation models are identified in Attachment 1, Section 3.1, *Emission Calculation Models*. Results of emission calculations also are considered records to be maintained.

Nonradioactive emission records will be maintained for a period of 5 years from the date of the monitoring, source test, measurement, report, or application. Records either could be in hard copy or electronic format.

Records will be made available to Ecology on request. Ecology does not have a specified timeframe in which nonradioactive records have to be made available to the agency. Therefore, the amount of time for DOE-RL or DOE-ORP to provide the records will be determined on a case-by-case basis.

### 6.2 RECORDS OF RADIOACTIVE EMISSIONS

Records of radioactive emissions specified in the AOP and/or underlying regulations are to be located and maintained in readily retrievable storage areas on the Hanford Site and available for WDOH inspection. Records either can be in hard copy or electronic format and will be maintained for a period of 5 years from the date of the monitoring, sampling, measurement, or reporting. Specific records are identified in the AOP, Attachment 2, Section 4.2, *Recordkeeping*.

#### 6.2.1 Records for National Emission Standards for Hazardous Air Pollutant (Major) Designated Stacks

The AOP, Attachment 2, Table 1.1, provides regulatory order requirements for major NESHAP stacks on the Hanford Site. The AOP, Attachment 2, Section 4.2, identifies the calibration records and monitoring data required for these major stacks.

#### 6.2.2 Records for All Sources of Radioactive Air Emissions

The AOP, Attachment 2, Table 1.2, provides regulatory order requirements for minor stacks on the Hanford Site. The AOP, Attachment 2, Section 4.2, also identifies, as applicable, the calibration records and monitoring data required for minor stacks, passively ventilated sources, and nonpoint and fugitive sources.

### 6.2.3 State-Only Records

The AOP, Attachment 2, Section 4.2, additionally identifies the state-only records required by the agency pursuant to WAC 246-247-080(8). These records are in addition to those records required for major and minor stacks noted in Sections 6.2.1 and 6.2.2.

## 7.0 REPORTING

Each Hanford Site contractor having regulated air pollutants will report monitored results in accordance with the AOP. There are several reports that include these monitored results. Existing reports prepared on the Hanford Site will be used to support the AOP semiannual and annual reporting requirements. No reporting or certifications are required for IEUs.

### 7.1 RADIONUCLIDE AIR EMISSIONS REPORT FOR THE HANFORD SITE

This existing report on radionuclide air emissions on the Hanford Site is required by 40 CFR 61.94 and WAC 246-247-080 and is due to WDOH by June 30<sup>th</sup> for the previous calendar year's operation (e.g., DOE/RL-2000-37). Hanford Site contractors currently provide input to support the preparation of the annual report. Sections of this report are certified as being true, accurate, and complete as required by 40 CFR 61.94(b)(9).

In addition to the information required by 40 CFR 61.94, this report includes the following information required by WAC 246-247-080(3):

- Wind rose or joint frequency table
- Annual average ambient temperature
- Annual average emission unit gas temperature if available
- Annual total rainfall
- Annual average emission unit flow rate and total volume of air released during the calendar year.

### 7.2 ANNUAL AIR EMISSIONS INVENTORY

This existing report on air emissions on the Hanford Site is required by WAC 173-400-105, and is due to Ecology no later than 105 days (about April 15<sup>th</sup>) after the end of the previous calendar year. The required forms are forwarded each year by Ecology and are completed by DOE-RL (e.g., DOE/RL-00-0SS-301). Hanford Site contractors currently provide input to support the preparation of the annual report. Input to this report is subject to WAC 173-400-105(7); however, the report is not certified as being true, accurate, and complete.

The annual air emissions inventory report minimally will contain nonradioactive air emission information on the following:

- Every significant emission point for which there is a current listing in the AOP, Attachment 1, Tables 1.2 through 1.6 (miscellaneous emission units listed in Table 1.7 are excluded)
- All nonradioactive air emissions where the NOC approval requires tracking
- All organic emissions subject to the *Resource Conservation and Recovery Act (RCRA) of 1976*, Subpart AA.

### 7.3 AIR OPERATING PERMIT SEMIANNUAL REPORT

These semiannual reports are new reports required by the AOP. Semiannual reports will be submitted by September 15<sup>th</sup> and by March 15<sup>th</sup>. The semiannual report submitted by September 15<sup>th</sup> will contain information from January 1 through June 30. The semiannual report submitted by March 15<sup>th</sup> will contain information from July 1 through December 31 of the previous year. There are no semiannual reporting requirements for IEUs defined by WAC 173-401-530. Preparation of these reports will be coordinated by the AOP team. Hanford Site contractors will provide input to support preparation and certification of these semiannual reports.

Each semiannual report will contain the following information for the applicable reporting period (January 1 through June 30 or July 1 through December 31).

- Each semiannual report will provide a reference to reports submitted to the regulatory agencies as required by "Standard Terms and Conditions", Section 4.5, "Permit Deviation Reporting". These reports will include any Reports of Closure issued during the reporting period. Also included will be any follow up reports requested by the agencies in response to a reported deviation.
- Each semiannual report will include reference to reports of required monitoring submitted during the reporting period, such as the radionuclide air emissions report, the annual air emissions inventory report, and the annual portable/temporary radioactive air emissions unit (PTRAEU) report.
- Each semiannual report will contain a summary of any substantiated air emission complaint investigation(s) required by the AOP, Attachment 1, Table 1.2, issued during the reporting period.
- For all minor radioactive emission units (potential to emit <0.1 mrem to the maximally exposed individual) listed in the AOP, Attachment 2, Tables 1.2, 1.3, 2.1, and any such units appended to the AOP, each semiannual report will status any required monitoring to verify low emissions during the reporting period (i.e., was the required monitoring performed? Yes or No.). The data derived from that monitoring will be reported in the annual NESHAP report (Section 4.3.1).
- Each semiannual report will list any new regulatory orders (e.g., NOC approvals) imposed by Ecology or WDOH during the reporting period.
- Each semiannual report will include a progress report on the compliance schedules identified in "Standard Terms and Conditions", Section 4.8 [WAC 173-401-615(3)(a)].

As indicated in Figure 5, the process for preparation and submittal of the semiannual report will take about 14 weeks.

The AOP team will assemble a draft semiannual data report that will be sent to the applicable site contractors for review to ensure accuracy and completeness. Contractors will include the appropriate DOE-RL or DOE-ORP representative in pre-certification reviews. The contractors will provide the AOP team with any corrected information. The AOP team will incorporate the corrections into a final semiannual report and distribute the report.

The AOP team will coordinate the signature process as follows:

- Develop a schedule for preparation and certification of the semiannual report
- Provide forms containing suggested contractor responsible official (e.g., company president) certification language
- Provide a draft certification form for the DOE-ORP and the DOE-RL responsible official
- Prepare final transmittal letter that contains signed contractor responsible official certification forms, and the joint DOE-ORP and DOE-RL responsible official certification form
- Deliver transmittal letter and semiannual report to DOE-RL for coordination of DOE-RL and DOE-ORP certifications, and assist in submittal to the agencies.

Hanford Site contractors will support certification as follows:

- Establish and implement the necessary certification process that meets the schedule
- Schedule time with responsible official for certification
- Sign a certification statement
- Provide the AOP team with the signed statement, preferably the original.

DOE-ORP will provide DOE-RL with their certification. DOE-RL also will certify and transmit one semiannual report with a single DOE-ORP and DOE-RL certification statement to Ecology, WDOH, BCAA, and the EPA.

Hanford Site contractors will use the following language or other such language required by their contract or legal staff for the semiannual report data certification:

“I certify that, based on information and belief formed after reasonable inquiry of the person or persons directly responsible for gathering the information contained herein or who perform relevant activities, the statements and information pertaining to our respective facilities or activities provided in this semiannual report are true, accurate, and complete.”

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Responsible Contractor Official

The DOE-RL and DOE-ORP certification statement will read as follows or as required by legal staff:

“In accordance with the WAC 173-401-200(27) definition for responsible official, I certify, pursuant to WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information provided in this semiannual report are true, accurate, and complete.”

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DOE-ORP Responsible Official

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DOE-RL Responsible Official

#### **7.4 ANNUAL COMPLIANCE CERTIFICATION**

Annually a compliance certification will be prepared and submitted in accordance with the requirements of the AOP, “Standard Terms and Conditions”, Section 4.3.4, “Annual Compliance Certification”. The annual compliance certification report will be submitted to the regulatory agencies by July 1.

The purpose of the annual compliance certification is to report compliance status with each AOP term and condition over the course of the entire reporting period. The compliance status options are limited to continuous, intermittent, or not applicable.

Terms and conditions in the annual compliance certification report consist of all the emission unit-specific requirements contained in the AOP, Attachment 1, and AOP, Attachment 2, tables (i.e., NOC approval conditions), plus the AOP Attachment 3 conditions for asbestos and open burning. Also, compliance status with the individual emission unit terms and conditions NOC approvals added to the AOP via a modification process must be certified.

According to the schedule in Figure 6, about 17 weeks are required to complete the report production, certification, and transmittal process. The AOP annual compliance certification requirements are displayed in a web application at <http://apweb02.rl.gov/aop/index.cfm>. The web application provides secure access for each contractor to enter and edit information pertaining only to their emission units. All users can view all emission unit information.

Guidance for completing the annual compliance certification report and for using the web application can be down loaded at <http://apweb02.rl.gov/aop/docs/guidance.htm>.

The contractors will be provided with a reminder that the web application is available for information input. Each contractor is responsible for providing a compliance status and the basis used to arrive at that status (i.e., compliance determination method) for each condition shown for their particular emission unit(s). A comment field also is provided for any clarification text. A hard copy report can be printed at any time (refer to the guidance for additional information regarding operation of the web application).

Contractor input can be changed as desired until the certification process begins. Once the certification process has begun, write access to the web application will be suspended to preclude changes to the information. The AOP team will need to be contacted for any changes desired after that time.

Contractors will include the appropriate DOE-RL or DOE-ORP representative in pre-certification reviews.

The AOP team will prepare the annual compliance certification report by compiling the contractor-certified information and coordinating the signature process as follows:

- Develop a schedule for preparation and certification of the annual compliance certification report
- Provide forms containing suggested contractor responsible official (e.g., company president) certification language
- Provide a draft certification form for the DOE-ORP and the DOE-RL responsible official
- Prepare final transmittal letter that contains contractor responsible official certification forms, and the joint DOE-ORP and DOE-RL responsible official certification form
- Deliver transmittal letter and annual compliance certification report to DOE-RL for coordination of DOE-RL and DOE-ORP certification, and assist in submittal to the agencies.

Hanford Site contractors will support certification as follows:

- Establish and implement the necessary certification process that meets the schedule
- Schedule time with responsible official for certification
- Sign a certification statement
- Provide the AOP team with the signed statement, preferably the original.

DOE-ORP will provide DOE-RL with their certification. DOE-RL also will certify and transmit the annual compliance certification report with a single DOE-ORP and DOE-RL certification statement to Ecology, WDOH, BCAA, and the EPA.

Hanford Site contractors will use the following language or other such language required by their contract or legal staff for certification of the annual compliance certification.

“I certify that, based on information and belief formed after reasonable inquiry of the person or persons directly responsible for gathering the information contained herein or who perform relevant activities, the statements and information pertaining to our respective facilities or activities provided in this annual compliance certification are true, accurate, and complete.”

\_\_\_\_\_  
Responsible Contractor Official

DOE-RL and DOE-ORP will use the following certification language or similar to certify compliance with AOP terms and conditions.

“In accordance with WAC 173-401-200(27)(c) as the responsible official, I certify, pursuant to WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information provided in this Annual Compliance Certification Report are true, accurate, and complete.”

\_\_\_\_\_  
DOE-ORP Responsible Official

\_\_\_\_\_  
DOE-RL Responsible Official

## 7.5 NESHAP QUARTERLY STATUS REPORT

This is an existing report required by the 1994 *NESHAP Federal Facility Compliance Agreement* (DOE/RL-94-RPS-129) (AOP, "Standard Terms and Conditions", Section 4.8) that indicates compliance or noncompliance with the *Federal Facility Compliance Agreement* schedule. The report is due to WDOH by Friday of the first full week of the second month following the end of the calendar quarter.

## 8.0 NOTIFICATIONS TO THE REGULATORY AUTHORITIES

DOE-RL or DOE-ORP or, as appropriate, the Hanford Site contractors, will notify the applicable regulatory agency using established protocols whenever there is a deviation with AOP conditions or there is a change in the monitoring methods allowed by AOP, Attachment 2, Figure 1.

Any monitoring result that deviates from the AOP conditions will be reported in accordance with the AOP, "Standard Terms and Conditions", Section 4.5, "Permit Deviation Reporting". Reports to the regulatory agencies will include any deviations from AOP conditions, including those attributable to upset conditions as defined in the AOP (WAC 173-400-107), the probable cause of such deviations, and any corrective actions or preventative measures taken.

All notifications required by AOP, "Standard Terms and Conditions", Section 4.5, made by the Hanford Site contractors directly to the regulatory authorities or through the Hanford Site Occurrence Notification Center will be recorded and included in the AOP semiannual reports (Section 7.3).

## 8.1 POTENTIAL THREATS TO HUMAN HEALTH OR SAFETY

Pursuant to AOP, "Standard Terms and Conditions", Section 4.5, deviations involving an emergency that represents a potential threat to human health or safety will be reported. DOE-RL or DOE-ORP or, as appropriate, the Hanford Site contractors, will use the onsite Occurrence Notification Center, or other established process, to report such deviations to Ecology, WDOH, or the BCAA as soon as possible following discovery<sup>1</sup>, but in no case later than 12 hours. This notice will contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken (DOE Order 232.1A). This notice also fulfills the immediate reporting requirements of WAC 173-401-615(3)(b), WAC 173-400-107(3), and WAC 246-247-080(5). Hanford Site contractors will include all deviation notifications in the AOP semiannual reports (Section 7.3).

## 8.2 NON-HEALTH OR SAFETY RELATED DEVIATIONS

Other deviations from AOP requirements or excess emissions will be reported to Ecology within 30 days after the end of the month during which the deviation was discovered or as part of routine emission monitoring reports. Hanford Site contractors will prepare or support preparation of these reports as directed by DOE-RL and/or DOE-ORP [WAC 173-401-615(3)(b) and WAC 173-400-107(3)].

Additional written reports might be required by either Ecology or WDOH, according to the requirements of WAC 173-400-107(3) or WAC 246-247-080(5) respectively. The Hanford Site contractors will prepare or support preparation of these reports as directed by DOE-RL and/or DOE-ORP.

For non-health or safety related deviations, DOE-RL or DOE-ORP or, as appropriate, the Hanford Site contractors, will notify WDOH, using an established process, within 24 hours, or during the course of the next normal business day, from the time of discovery<sup>1</sup> of the condition or emission that would require notification pursuant to WAC 246-247-080(5). Such notification will be required for other than normal operations when a potential or actual release of radionuclides to the air is due to any one or more of the following:

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<sup>1</sup> Qualitative determination that a potential threat to public health or safety exists or existed after an evaluation of pertinent information.

- Non-routine bypass or failure of required abatement control technology identified in the AOP, Attachment 2, Tables 1.1 and 1.2
- Non-routine and/or unexpected operational changes affecting emissions
- An exceedance of the dose standard of 10 mrem per year for the Hanford Site
- An exceedance of emission limits or conditions in a regulatory order (e.g., NOC approval, enforcement action, or license).

### 8.3 NOTICES OF CLOSURE AND RESPONSE ACTIONS

Hanford Site contractors will file a report of closure through DOE-RL or DOE-ORP, as appropriate, to WDOH whenever operations producing emissions of radioactive material permanently cease at any regulated emission unit (except temporary emission units). The closure report will indicate whether, despite cessation of operations, there is still a potential for radioactive air emissions and a need for an active or passive ventilation system with emission control and/or monitoring devices.

A list of filed reports of closure can be viewed at [http://apweb02.rl.gov/aop/docs/closure\\_reports.htm](http://apweb02.rl.gov/aop/docs/closure_reports.htm).

If decommissioning is planned and will constitute a modification, a NOC will be required, as applicable, in accordance with WAC 246-247-060 [WAC 246-247-080(6)].

As directed by DOE-RL and/or DOE-ORP and in a timely manner, the Hanford Site contractors will prepare or support preparation of any written responses to inspection results that require the facility to implement corrective actions or any other actions so directed by WDOH.

### 8.4 ASBESTOS NOTIFICATION REQUIREMENT

AOP, BCAA- Attachment 3, requires that the Hanford Site comply with the requirements of 40 CFR 61, Subpart M, "National Emission Standard for Asbestos", and BCAA, Regulation 1, Article 8. Both require notifications of intent (NOIs) to demolish or renovate a facility. By agreement, NOIs are filed only with the BCAA. Asbestos activities on the Hanford Site are reported to the BCAA, either by the NOIs for individual projects or as a collective estimate by either of the two annual NOIs. Notification requirements are based on the type of work (renovation or demolition) and the quantity of asbestos expected to be disturbed.

An individual NOI will be submitted for demolition work (whether asbestos is present or not) or renovation projects where the combined amount of regulated asbestos-containing material (RACM) to be disturbed is above BCAA threshold values (10 linear feet on piping or 48 square feet on other facility components). The individual NOI should be received by the BCAA at least 10 working days before commencement of the renovation or demolition activities.

An amendment to the NOI will be submitted when the estimated amount of RACM that will be disturbed changes by more than 20 percent. If the change in the amount of RACM is an increase of more than 20 percent, the contractor will stop work until an amended NOI is submitted to the BCAA.

Two annual NOIs for planned renovation activities will be submitted by December 15th of the calendar year preceding the year for which the notifications are being given. One annual NOI will be filed based on the amounts of planned asbestos renovations that collectively are above BCAA threshold values (10 linear feet or 48 square feet) but below the NESHAP limits (260 linear feet on pipes or 160 square feet on other facility components). A second annual NOI will be filed for planned asbestos renovations above the NESHAP limits.

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## **9.0 OFF-PERMIT CHANGES AND CHANGES NOT REQUIRING A PERMIT REVISION**

Off-permit changes or changes not requiring an AOP revision are described in Appendix B. Appendix B also describes requirements associated with these types of changes.

Written notifications will be transmitted to the appropriate permitting agencies through DOE-RL or DOE-ORP as appropriate. A copy of each written notification will be provided to the AOP team to maintain an accurate list of AOP conditions.

A NOC approval for a WDOH-regulated activity not listed in the AOP would qualify as an off-permit change.

An example of a change not requiring an AOP revision is a change of a particular NOC condition in the AOP that does not alter monitoring, reporting, or recordkeeping, or that does not decrease the requirement to certify. Specific examples of changes not requiring an AOP revision can be viewed at <http://apweb02.rl.gov/aop/docs/changes.htm>.

### **9.1 OFF-PERMIT CHANGE PROCESS (WAC 173-401-724)**

Hanford Site contractor actions for requesting an off-permit change are as follows:

- Prepare Off-Permit Change Request form (Appendix A), and submit the properly completed form to either DOE-RL or DOE-ORP, as appropriate, for transmittal to WDOH and/or Ecology and the EPA
- Retain a record describing changes made that result in emissions of a regulated air pollutant subject to an applicable requirement, but otherwise not regulated under the AOP, and the emissions resulting from those changes
- Comply with applicable pre-construction review requirements.

Ecology will incorporate the Off-Permit change into the AOP in the next AOP revision subject to public review.

Previously filed Off-Permit Change Requests can be found at <http://apweb02.rl.gov/aop/docs/off-permit.htm>.

### **9.2 CHANGES NOT REQUIRING A PERMIT REVISION PROCESS (WAC 173-401-722)**

Hanford Site contractor actions for requesting a change not requiring a permit revision are as follows:

- Prepare a Notification of Changes Not Requiring Permit Revision form (Appendix A) that includes a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition no longer applicable as a result of the change

- Submit the completed form to DOE-RL or DOE-ORP, as appropriate, for submittal to WDOH and/or Ecology and the EPA
- Provide EPA and Ecology and/or WDOH with a notification at least 7 days before making change
- Retain a copy of the notification and provide a copy to the AOP team. The AOP team will attach each notice to their copy of the AOP.

Ecology will attach each notice to their copy of the AOP. The change will be incorporated into the AOP at AOP renewal.

A list of previously filed Notifications of Changes Not Requiring Permit Revision can be viewed at <http://apweb02.rl.gov/aop/docs/changes.htm>.

## 10.0 PERMIT MODIFICATIONS

There are three types of AOP modifications: (1) an administrative amendment to the AOP (WAC 173-401-720), (2) a minor AOP modification [WAC 173-401-725(2)], and (3) a significant AOP modification (WAC 173-401-725(4)). Hanford Site contractors will copy the AOP team and Ecology on any AOP modification requests.

The administrative amendment will be used for small changes or corrections. Administrative items could involve corrections of typographical errors, name or ownership changes, increased frequency of monitoring or reporting, or incorporation of new source review provisions that have undergone public review. A change described in an administrative amendment can be implemented immediately. Ecology is required by regulation [WAC 173-401-720(3)(a)] to revise the AOP within 60 days following notification of the change. This method of AOP modification does not go through a public or EPA review. For a list of administrative amendments processed, refer to <http://apweb02.rl.gov/aop/docs/adminamend.htm>.

A minor AOP modification will be used to make an allowed operational change that might increase emissions above AOP conditions. An application for a minor AOP modification must be certified by a responsible official before submittal to Ecology. Following receipt of the application for modification, Ecology will have 90 days to take action on the requested change. Within that 90-day period, minor AOP modifications will require a 21-day public review followed by a 45-day review by the EPA. A modification filing will consist of the NOC application and the completed and certified modification form (Appendix A), and will be transmitted by letter to Ecology and, as appropriate, WDOH. The requested change can be implemented immediately after filing the modification application, provided the proposed change (e.g. NOC application) has been reviewed and approved by the permitting authority. On request, minor modifications can be processed as a group rather than individually; refer to <http://apweb02.rl.gov/aop/docs/minormods.htm> for a listing of filed minor modifications.

A significant modification will be used to make a change to the AOP that does not qualify as an administrative amendment or minor AOP modification. This type of modification will be required for any relaxation in the existing monitoring, reporting, or recordkeeping criteria. An application for a significant modification also must be certified. The approval process will include a 30-day public review period and an EPA 45-day review period. Requested changes can not be made until after the agency has issued the modification at the conclusion of the review process. Ecology is to complete the review on the majority of significant AOP modifications within 9 months after receipt of a complete NOC application.

Generally, the significant modification process will be required for any action that qualifies as a Title I modification [WAC 173-401-200(33)]. However, for radionuclide emitting sources, EPA, Region 10, has provided clarification with respect to the requirement to obtain an approval to construct or modify under 40 CFR 61.96. While the requirement to obtain an approval to construct is a Title I requirement, approval to construct is not a Title V applicable requirement. Therefore, obtaining an approval to construct or modify under 40 CFR 61.96 does not by itself mean the change is a Title I modification (i.e., actions at a radionuclide-only emission point are not a Title I modification).

Emission sources determined to be IEUs, as defined in WAC 173-401, that begin operation or are modified after the effective date of the AOP will not be listed in AOP modifications.

## 10.1 PERMIT REVISION PROCESS

The Hanford Site process for revising the AOP is as follows:

- Step 1. Determine AOP revision path for proposed action (Section 10.0 and Appendix B)
- Step 2. Prepare NOC application or other required documentation, if necessary, for WDOH, Ecology, and/or EPA as appropriate
- Step 3. Prepare appropriate AOP revision/change documentation by completing the relevant form(s) (Appendix A)
- Step 4. Submit NOC application or other required documentation and AOP revision documentation to appropriate permitting agency and required EPA notifications as described in Appendix B
- Step 5. Forward a copy of the documentation to the AOP team.

Changes requested by an administrative amendment can be implemented immediately on filing the request.

For a minor modification, DOE-RL and/or DOE-ORP can implement the change immediately after receipt of the agency approval, provided that the required minor modification application form and the EPA and Tribes notification form have been filed. DOE-ORP and DOE-RL need not comply with the existing terms and conditions sought to be modified during the time between agency approval and incorporation of the modification into the AOP [WAC 173-401-725(2)(f)].

Changes requested by a significant modification can not be implemented until after Ecology formally issues the change.

The AOP modification key and the associated forms can be downloaded from <http://apweb02.rl.gov/aop/docs/AOP-Modification-Key.doc>.

## 10.2 NEW SOURCE REVIEW

DOE-ORP and DOE-RL will submit a NOC application to Ecology before the establishment of any new source or emission unit or modification to an existing source. An agency NOC approval, in addition to the required AOP modification or AOP change forms, will be required before initiating work. Approval to proceed with work initially might be in the form of an e:mail or FAX before receipt of the formal regulatory order approval.

Hanford Site contractors preparing a NOC application for DOE-RL or DOE-ORP, in accordance with the requirements of the AOP, "Standard Terms and Conditions", Section 4.9, could contact the appropriate agency permit writer for clarification of application content when preparing the NOC. Each Hanford Site contractor receiving NOC approvals from Ecology will provide a copy of that approval to the AOP team. Each Hanford Site contractor receiving agency nonradioactive NOC approval will report that approval in the next semiannual report in accordance with the AOP, Section 4.3.3, and Section 7.3 of this IP.

### **10.3 NEW SOURCE REVIEW EXEMPTIONS**

Certain projects or activities are exempt from new source review either because emissions would be below emission thresholds [WAC 173-400-110(5)] or because the activity is listed as exempt in WAC 173-400-110(4). Ecology will be notified of any new source review inapplicability determination based on emission thresholds listed in WAC 173-400-110(5)(d), the exemption threshold table. If Ecology determines that the project will have more than a de minimus impact on air quality, Ecology still could require the filing of a NOC application. Unless Ecology requests a NOC application, actual construction on the project can begin 31 days after Ecology receives the summary.

When appropriate, Hanford Site contractors will prepare and submit new source review exemption letters through DOE-RL or DOE-ORP.

### **10.4 NOTICE OF CONSTRUCTION FOR PROJECTS/ACTIVITIES WITH POTENTIAL TO EMIT RADIOACTIVE AIR EMISSIONS**

Per AOP, Attachment 2, Sections 2.1 and 2.3, DOE-RL or DOE-ORP will submit a NOC application to WDOH and, when appropriate the EPA, before construction or significant modification of an emission unit that has the potential to emit radioactive air emissions. Agency approval and the appropriate AOP change or modification request will be required before initiating work.

Hanford Site contractors preparing a NOC application for DOE-RL or DOE-ORP can contact the appropriate agency permit writer for clarification of application content.

Each Hanford Site contractor that receives a NOC approval from WDOH or an approval to construct from the EPA will provide a copy of both the NOC application and the approval to the AOP team.

In accordance with Section 7.3 of this IP, each Hanford Site contractor receiving an agency approval for a project or activity with the potential to emit radioactive air emissions will report that approval in the next semiannual report.

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## 11.0 AOP RENEWAL APPLICATION

The AOP is issued for a fixed term of 5 years from the effective date of issuance (AOP, Standard Terms and Conditions, Section 4.1). The current AOP became effective on July 2, 2001. The right to operate under the current AOP terminates on July 1, 2006, unless a complete renewal application is submitted as specified in writing by Ecology, WDOH, or BCAA (January 2005, 18 months before the AOP expires). On receipt of a timely and complete application for renewal, the Hanford Site can continue to operate subject to final action by Ecology, Health, and BCAA on the renewal application. This protection ceases to apply if DOE-RL and DOE-ORP fail to submit a complete application by January, 2005.

The application for renewal includes the following:

- Current AOP number
- Description of AOP revisions and off-permit changes that occurred during the permit term
- Any applicable requirements promulgated and not incorporated into the AOP during the permit term.

There are additional renewal requirements contained in WAC 246-247 that apply to AOP, Attachment 2. According to WAC 246-247-060(9), the renewal request will include the following:

- A summary of the operational status of all emission units
- The status of facility compliance with the standards of WAC 246-247-060
- The status of any corrective actions necessary to achieve compliance with WAC 246-247.

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## **12.0 NEW APPLICABLE REQUIREMENTS**

From time to time, new applicable requirements will become effective and will need to be incorporated into the AOP. Per WAC 173-401-730, the AOP will be re-opened to add those requirements that become applicable with 3 years or more remaining before the AOP expires. While it is not required to re-open the AOP to include new requirements when the AOP is due to expire in two years or less, it is likely this will occur.

Details regarding implementing new requirements will be coordinated among the contractors and DOE-RL and DOE-ORP by the AOP team.

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### 13.0 ELECTRONIC TOOLS

The AOP is available electronically for downloading in Portable Document Format (PDF) from a link on the AOP website (<http://apweb02.rl.gov/aop/docs.cfm>) that points to the Ecology website (<http://www.ecy.wa.gov/pubs/0005006.pdf>). In addition to the AOP, the AOP website contains applicable Washington State regulations and other AOP related information, as well as specific requirements for each emission point listed in the AOP.

This web page also contains links to the Hanford Geographic Information System. The Hanford Geographic Information System displays an electronic map with the location of emission points contained in the AOP, along with, when available, certain emission unit-specific physical information and a process flow diagram. The process flow diagrams are electronic reproductions of those contained in the updated AOP application (DOE/RL-95-07, Rev. 6) submitted to the agencies during June of 1997.

A link to an electronic suggestion form is provided to implement the ISMS management plan and process to provide feedback, and offers areas of improvement in implementing the AOP.

The AOP team is responsible for maintaining the AOP website.

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## 14.0 INSTRUCTION

Instruction will be provided to users regarding the web page, retrieval of specific regulatory order approvals, new requirements contained in the AOP, and on the AOP modification processes. On request, users also will be provided with specific instruction regarding the scope of the AOP, and the specific requirements.

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## 15.0 DISPUTE RESOLUTION

In accordance with WAC 173-401-735, a regulatory order of approval, any conditions contained in an order of approval, or other requirements contained in the AOP might be appealed to the Pollution Control Hearing Board. In the event an air issue arises that a Hanford Site contractor believes a resolution is required, the Hanford Site contractor could elevate the issue to DOE-RL or DOE-ORP as appropriate. DOE-RL and DOE-ORP will review the issue and, if deemed appropriate and justifiable, request the Pollution Control Hearing Board rule on the issue.

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## 16.0 CERCLA REGULATIONS AND RCRA SUBPARTS AA, BB, CC

The regulations for *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) of 1980 and for RCRA, Subparts AA, BB, and CC, are promulgated under statutory authority other than the federal *Clean Air Act of 1977* and, as such, are not Title V AOP applicable requirements. Therefore, these requirements are not enforceable under Title V authority and are not included in the AOP.

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## 17.0 REFERENCES

- DOE Order 232.1A, *Occurrence Reporting and Processing of Operations Information*.
- DOE Policy 450.4, *Safety Management System Policy*.
- DOE-RL-00-0SS-301, April 17, 2000, "Calendar Year 1999 Nonradioactive Inventory of Airborne Emissions Report", U.S. Department of Energy, Richland Operations Office to Washington State Department of Ecology correspondence.
- DOE-RL, 1999, *Risk Management Plan for 283-W Water Treatment Facility*, U.S. Department of Energy, Richland Operations Office, Correspondence 99-EAP-339 to RMP Reporting Center, Arlington, Virginia.
- DOE/RL-95-07, *Hanford Site Air Operating Permit Application*, May 1995, U.S. Department of Energy, Richland Operations Office, Richland, Washington, updated periodically.
- DOE-RL-99-06, Office of River Protection, *Integrated Management Plan for the Hanford Tank Waste Remediation System*, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- DOE/RL-2000-37, *Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 1999*, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- Federal Facility Compliance Agreement for Radionuclide NESHAP*, DOE-RL 94-RPS-129 transmittal to U.S. Environmental Protection Agency, Seattle, Washington.
- Hanford Site Title V Air Operating Permit 00-05-006*, Washington State Department of Ecology, Washington State Department of Health, and Benton Clean Air Authority.
- Source Test Manual*, Office of Air Programs, Air Resources Management Division, Updated July 12, 1990, Washington State Department of Ecology, Olympia, Washington.

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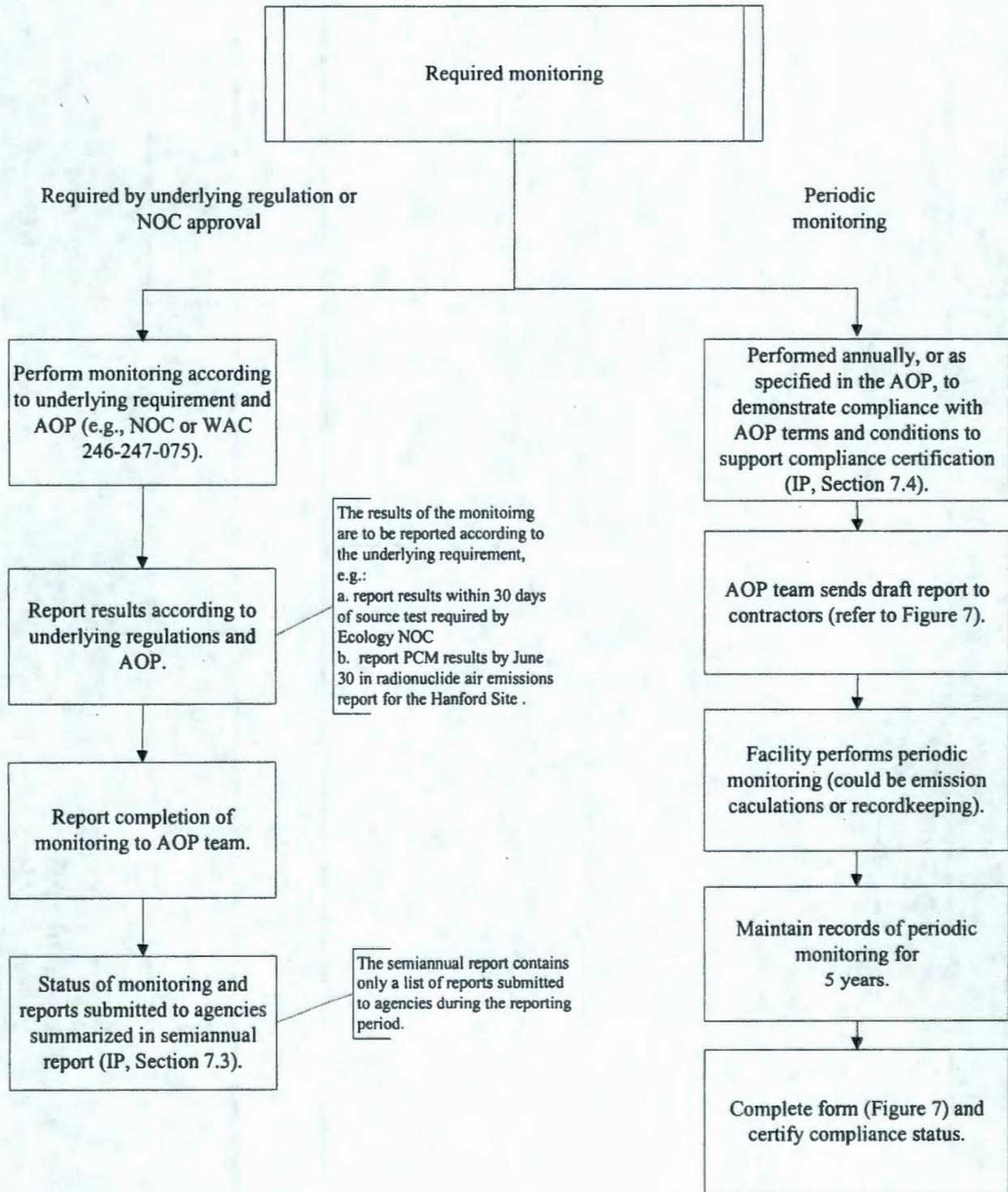


Figure 1. Monitoring and Reporting Process Flow Chart.

### Visible Emissions Observation

Emission Pt. #	Location or facility	Sketch process unit; indicate observer position relative to source and sun; indicate emission point being observed					
Company							
Sky conditions	Wind direction						
Wind speed	Precipitation						
Comments <sup>1</sup> :							
<b>Observations</b>							
Date	Observer	Clock time (hour:min)	Observation period duration <sup>2</sup> (min:sec)	Visible emissions		Cause <sup>1</sup>	Corrective actions <sup>1</sup>
				Y	N		
1.		Begin					
		End					
2.		Begin					
		End					
3.		Begin					
		End					

<sup>1</sup> If additional space is required, use back side of this form.

<sup>2</sup> Minimum observation duration is 10 minutes. If visible emissions are observed for more than 10 consecutive minutes, refer to back of this form.

## Figure 2. Visible Emissions Observation Form (cont.)

**Visible Emissions Observation Instructions:** Visible emission surveys must be conducted during daylight hours when the emission unit is operating.

**Position.** Survey the affected facility, building, or structure housing the process to be observed and determine the locations of potential emissions. If the affected facility is located inside a building, determine an observation location that is consistent with the requirements of the applicable regulation (i.e., outside observation of emissions escaping the building/structure or inside observation of emissions directly emitted from the affected facility process unit). Select a position that enables a clear view of the potential emission point(s) of the affected facility or of the building or structure housing the affected facility, as appropriate for the applicable subpart. A position at least 15 feet, but not more than 0.25 mile, from the emission source is recommended. For outdoor locations, select a position where the sun is not directly in the observer's eyes.

**Field Records--Outdoor Location.** Record the following information on the field data sheet (Figure 2): emission point, company name, observer's name, and date. Record also the estimated sky condition, wind speed, wind direction, and precipitation. Sketch the process unit being observed and note the observer location relative to the source and the sun. Indicate the potential and actual emission points on the sketch.

**Observations.** Record the clock time when observations begin. Use one stopwatch to monitor the duration of the observation period; start this stopwatch when the observation period begins. If the observation period is divided into two or more segments by process shutdowns or observer rest breaks, stop the stopwatch when a break begins and restart without resetting when the break ends. Stop the stopwatch at the end of the observation period. The accumulated time indicated by this stopwatch is the duration of the observation period. When the observation period is completed, record the clock time. During the observation period, continuously watch the emission source. Condensed water vapor is not considered an emission. Record the results of the observations on the form.

**Response:** Emission units subject to Tier 1. If the operator observes visible emissions for more than 10 consecutive minutes during the observation period, the cause(s) of the visible emissions will be determined and corrective actions taken as necessary, or a visible determination of opacity will be performed using EPA Method 9. Records of corrective actions taken to reduce opacity will be maintained and available for Ecology inspection.

Emission units subject to Tier 2. If visible emissions from one of these emission units are observed for more than 10 consecutive minutes, an attempt to identify the cause(s) of the visible emissions will be made and results recorded. The recorded entry also will identify any corrective actions taken and the likely frequency of a future re-occurrence. If the event likely is to be re-occurring, and can not be demonstrated to consist of water vapor, a determination of opacity will be made using EPA Method 9.

Emission units subject to Tier 3. Maintain abatement control technology as required in the AOP, Attachment 2, Tables 1.1, 1.2 and 2.1, for that particular emission unit. No additional monitoring or recordkeeping is required. (Note: form not required for Tier 3.)

Completed visible emission forms. EPA Method 9 inspection results must be maintained for 5 years following the visible emission observation.

## Complaint Investigation Form

Company:  
 Person taking the complaint:  
 Person making the complaint:

Date complaint received	Nature of complaint*	Complaint description	Preliminary assessment of condition	Corrective action(s) taken

**Instructions:**

Complaints forwarded by Ecology will be addressed promptly and assessed for corrective action. An initial informal response will be made to Ecology within 30 working days of the permittee receiving the complaint. This initial response will document preliminary investigation results and any planned or completed corrective actions. Follow up report(s) will be provided as directed by Ecology.

Records will be maintained for 5 years.

\* Complaint categories are as follows:

- Odor
- Fallout
- Emissions detrimental to persons or property
- Concealment and masking.

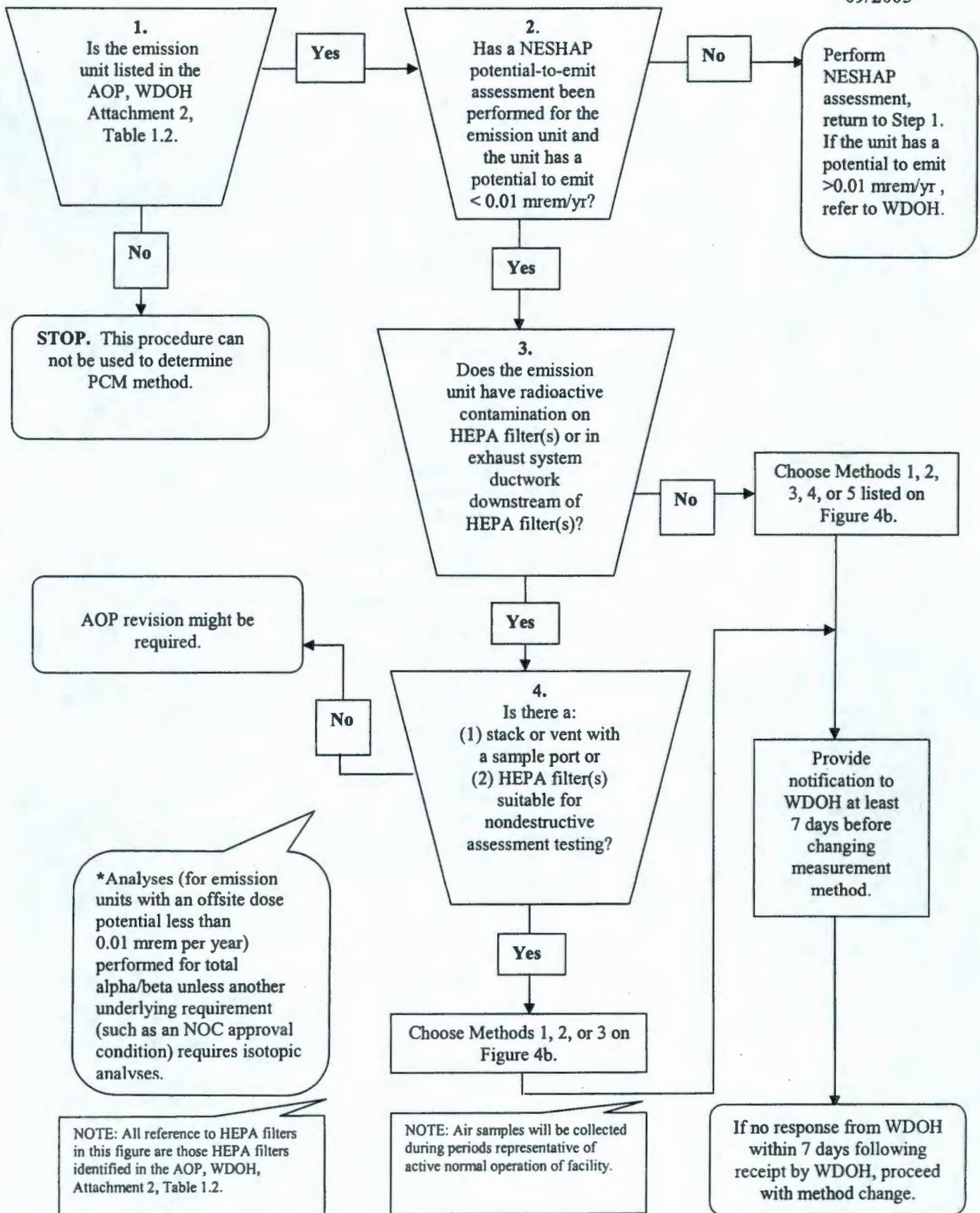


Figure 4a. Process for Changing Minor Stack Periodic Confirmatory Measurement Method Listed in WDOH-Attachment 2, Table 1.2.

## Acceptable Methods

**Method 1.**

Perform record stack sampling a minimum of 1 week per calendar year or as negotiated with WDOH.

**Method 2.**

Perform nondestructive assessment test a minimum of one time every calendar year or as negotiated with WDOH.

**Method 3.**

Engineering calculations.

**Method 4.**

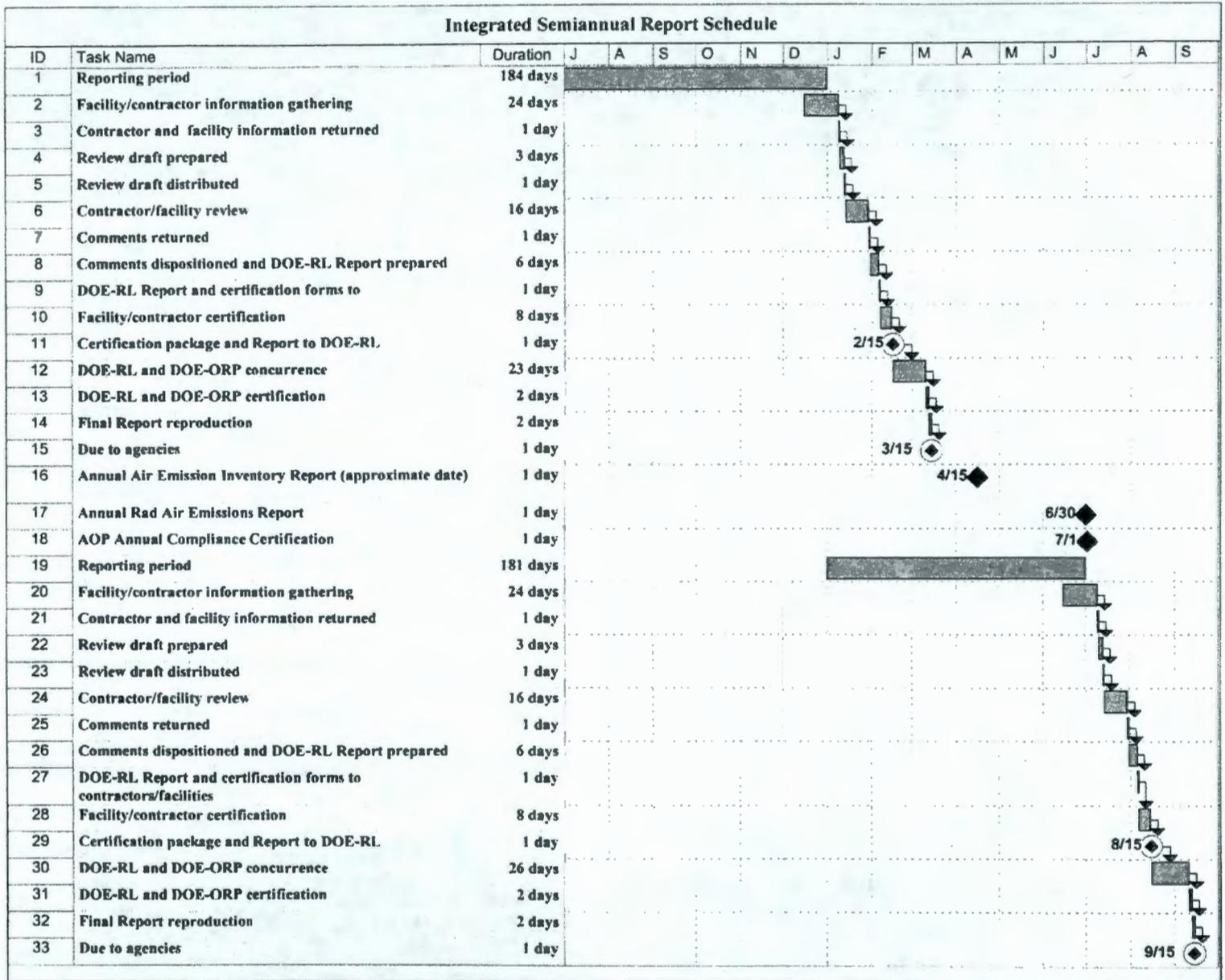
Upstream air samples from areas within the facility with representative radioactive contamination performed a minimum of 1 week per calendar year at each sample location or as negotiated with WDOH.

**Method 5.**

Wipe samples of interior surfaces with representative radioactive contamination a minimum of once per calendar year or as negotiated with WDOH.

Figure 4b. Process for Changing Minor Stack Periodic Confirmatory Measurement Method Listed in WDOH-Attachment 2, Table 1.2 (cont).

Figure 5. Integrated Semiannual Report Schedule.



### Annual Compliance Certification Report Schedule

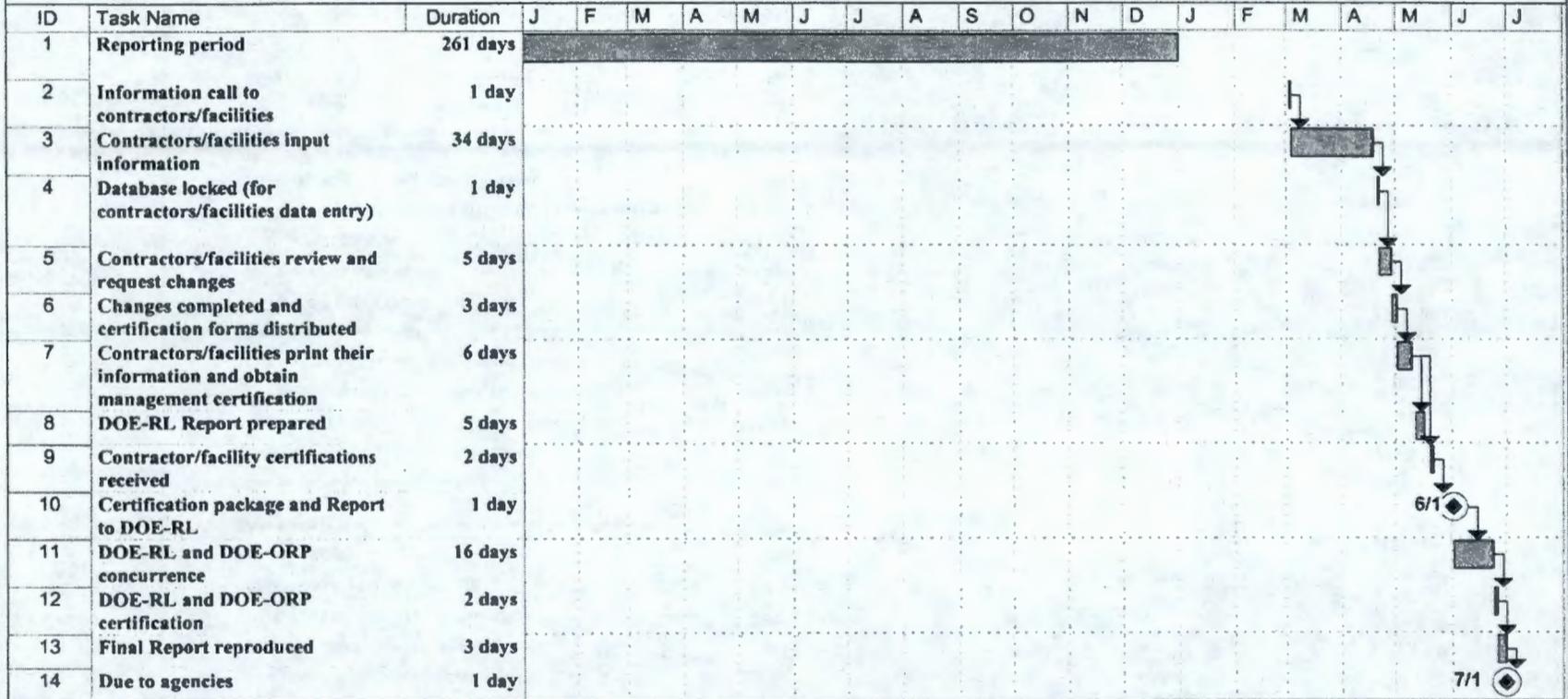


Figure 6. Annual Compliance Certification Schedule.

**APPENDIX A**

**HANFORD SITE AIR OPERATING PERMIT MODIFICATION REQUEST OR  
OFF-PERMIT CHANGE NOTIFICATION**

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## SIGNIFICANT PERMIT MODIFICATION REQUEST

Permit Number 00-05-006

Significant permit modifications are allowed under WAC 173-401-725(4) for those modifications that do not meet the requirements for a minor permit modification or an administrative amendment.

Provide the following information pursuant to WAC-173-401-725(4)

**Emission point identification and description of the change:**

**Describe the emissions resulting from the change:**

**Describe the new applicable requirements that will apply as a result of the change: (to be provided in the agency approval order.)**

**Suggested Draft Permit Language:**

*for example:*

- *Monitoring/PCM that will be used to support compliance determination/certification*
- *Description of air pollution control equipment (abatement technology)*
- *Other controls such as limits on inventory; process limits such as throughput, hours of operation, or acceptance criteria; or other assumptions used in potential to emit calculations*
- *Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.*

<b>CERTIFICATION</b> <i>Provide certification pursuant to (WAC 173-401-520)</i>	
I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete.	
Responsible Official:	
Title:	
Signature:	Date:
For Hanford Site Use Only:	
AOP Change Control Number:	Date Submitted:

## MINOR PERMIT MODIFICATION REQUEST

**Permit Number 00-05-006**

*attach the completed Notification of Permit Modification Request Form to the EPA/tribes/affected state*

Minor permit modifications are allowed under WAC 173-401-725 and meet the following criteria:

- Does not violate any applicable requirement
- Does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit
- Is not a Title I modification.

Provide the following information pursuant to WAC-173-401-725(2)(b)

**Description of the change:**

**Describe the emissions resulting from the change:**

**Describe the new applicable requirements that will apply as a result of the change:**

**Suggested Draft Permit Language:**

*for example:*

- *Monitoring/PCM that will be used to support compliance determination/certification*
- *Description of air pollution control equipment (abatement technology)*
- *Other controls such as limits on inventory; process limits such as throughput, hours of operation, or acceptance criteria; or other assumptions used in potential to emit calculations*
- *Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.*

**CERTIFICATION**

*Provide certification pursuant to (WAC 173-401-725(2)(b)(iii))*

I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete. I also certify that the proposed modification meets the criteria for use of minor permit modification procedures, as hereby requested.

Responsible Official:

Title:

Signature:

Date:

For Hanford Site Use Only:

AOP Change Control Number:

Date Submitted:

## GROUP PROCESSING OF MINOR PERMIT MODIFICATIONS REQUEST

**Permit Number 00-05-006**

*attach the completed Notification of Permit Modification Request Form to the EPA/affected states/tribes*

Minor permit modifications are allowed under WAC 173-401-725 and meet the following criteria:

- Does not violate any applicable requirement
- Does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit
- Is not a Title I modification.

Group processing of minor modifications is limited to those minor modification applications that collectively are below the following thresholds:

- 10% of the emission limits for the emission unit that is the subject of the application
- 20% of the applicable definition of major source in WAC 173-401-200
- or 5 tons/year, whichever is least.

Provide the following information pursuant to WAC-173-401-725(3)(b):

**Description of the change:**

--

**Describe the emissions resulting from the change:**

--

**Describe the new applicable requirements that will apply as a result of the change:**

--

**Suggested Draft Permit Language:**

*for example:*

- *Monitoring/PCM that will be used to support compliance determination/certification*
- *Description of air pollution control equipment (abatement technology)*
- *Other controls such as limits on inventory; process limits such as throughput, hours of operation, or acceptance criteria; or other assumptions used in potential to emit calculations*
- *Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.*

--

**List all other pending applications awaiting group processing (WAC 173-401-725(3)(b)(iv)):**

--

**Determination that group is below emission threshold (WAC 173-401-725(3)(b)(iv)):**

Do the emissions stated in this permit modification request added to the emissions from the minor modification requests listed above equal or exceed the group processing thresholds? (Y or N)

**CERTIFICATION**

*Provide certification pursuant to (WAC 173-401-725(3)(b)(iii))*

I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete. I also certify that the proposed modification meets the criteria for use of group processing of minor permit modification procedures, as hereby requested.

Responsible Official:

Title:

Signature:

Date:

**For Hanford Site Use Only:**

AOP Change Control Number:

Date:



## NOTIFICATION OF CHANGES NOT REQUIRING PERMIT REVISION

### Section 502(b)(10) Change\*

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of a change not requiring permit revision described as follows.

This change is allowed pursuant to WAC 173-401-722(1)(a) and WAC 173-401-722(2) as:

1. Change is not a Title I modification
2. Change does not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions or in total emissions
3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit
4. Notification is provided to Ecology, WDOH, and the EPA at least 7 days before making the change
5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**Permit Number: 00-05-006**

Provide the following information pursuant to WAC-173-401-722(2)(a):

<b>Description of the change:</b>	
<b>Date of Change:</b>	
<b>Describe the emissions resulting from the change:</b>	
<b>List any permit term or condition that is no longer applicable as a result of the change:</b>	
<b>For Hanford Site Use Only:</b>	
AOP Change Control Number:	Date:

\* WAC 173-401-200(28) states that "Section 502 (b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

## NOTIFICATION OF OFF-PERMIT CHANGE

Permit Number: 00-05-006

This notification is provided to Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as a notice of an off-permit change described as follows.

This change is allowed pursuant to WAC 173-401-724(1) as:

1. Change is not specifically addressed or prohibited by the permit terms and conditions
2. Change does not weaken the enforceability of the existing permit conditions
3. Change is not a Title I modification or a change subject to the acid rain requirements under Title IV of the FCAA
4. Change meets all applicable requirements and does not violate an existing permit term or condition
5. Change has complied with applicable pre-construction review requirements established pursuant to RCW 70.94.152.

Provide the following information pursuant to WAC-173-401-724(3):

<b>Description of the change:</b>	
<b>Date of Change:</b> (To be provided in the agency approval order.)	
<b>Describe the emissions resulting from the change:</b>	
<b>Describe the new applicable requirements that will apply as a result of the change:</b> (To be provided in the agency approval order.)	
<b>For Hanford Use Only:</b>	
AOP Change Control Number:	Date Submitted:

**HANFORD FACILITY NOTICE OF CONSTRUCTION REVISION FORM**

Emissions Unit:

NOC Application Title and Reference Document:

*Insert emission unit number and stack ID number*

*Insert title and document number amended*

**Revision:** *State section of application to be revised (e.g., description section, paragraph 2).*

**Discrepancy:**

*Provide a couple of sentences on why the revision is requested and/or required (e.g., the current application's description text doesn't match the facility's future planned mission).*

**NOC Application Revision:**

**DESCRIPTION**

*(Refer the reader to section in the application to be modified)*

*[Provide either: (1) a summary of the text changes to the application, with redline/strikeout pages from the application's actual text as an attachment to this form, OR (2) provide the redline/strikeout paragraph to be changed in this section of the form.]*

Reviewed by Contractor: <b>(to be signed before transmittal to Ecology)</b>	Reviewed by DOE-RL/ORP: <b>(to be signed before transmittal to Ecology)</b>	Received by Ecology: <b>(to be signed before transmittal to Ecology)</b>
_____	_____	_____
_____	_____	_____
_____	_____	_____
Date	Date	Date

**NOC Application/Permit Revision/AOP Off-Permit Change Notification**

NOTE: Any increase to abated or unabated PTE requires a full NOC modification

**REASON FOR CHANGE**

Submittal Date: \_\_\_\_\_

Submittal Type: **RTAM Submittal**

**NOC Application Revision**

New NOC Rev Number: \_\_\_\_\_

**Condition Change/ Clarification**

WDOH Condition Number: \_\_\_\_\_

AOP Condition Number: \_\_\_\_\_

**ALARACT Revision**

New ALARACT Rev Number: \_\_\_\_\_

**PROJECT IDENTIFICATION**

Project Title: \_\_\_\_\_

Current NOC Application Number: \_\_\_\_\_

AEI ID Number (AOP Emission Unit Number(s): \_\_\_\_\_

Current WDOH Approval Letter Number(s): \_\_\_\_\_

WDOH NOC ID Number: \_\_\_\_\_

**DESCRIPTION OF CHANGE**

Number of Attachments 0

*WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.*

Proposed Change (provide original and proposed wording):

**SIGNATURES**

Reviewed by Contractor	Reviewed by RL/ORP	Approved by WDOH
Date: _____	Date: _____	Date: _____

**FOR WDOH USE ONLY**

Data Entry Completed By: \_\_\_\_\_ Date: \_\_\_\_\_

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**APPENDIX B**

**HANFORD SITE AIR OPERATING PERMIT MODIFICATION PROCESS KEY**

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## HANFORD SITE AIR OPERATING PERMIT MODIFICATION PROCESS KEY

Permit Number 00-05-006

1. Is/are the proposed change(s) to an applicable requirement, term, or condition that is/are already in the AOP?  
Yes – Go to #2  
No – Go to #6.
  
2. Is/are the proposed change(s) a Title I modification<sup>1</sup> or does/do change/changes involve significant changes and/or any relaxation to existing monitoring, reporting, or recordkeeping requirements in the AOP?  
Yes – Go to Significant Modification Process  
No – Go to #3.
  
3. Does/do the proposed change(s) only:
  - Correct typographical errors
  - Identify a change in the name, address, or telephone number of any person identified in the AOP, or provide a similar minor administrative change at the source
  - Require more frequent monitoring or reporting by the permittee
  - Incorporate into the AOP the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program that substantially is equivalent to the AOP approval process, like new source review, including public, Tribes, affected states, and EPA review?Yes (to any) – Go to Administrative Amendment Process  
No (to all) – Go to #4.

---

<sup>1</sup> Title I Modification:

WAC 173-401-200(33) defines a "Title I modification" or "modification under any provision of Title I of the FCAA" as any modification under Sections 111 (Standards of Performance for New Stationary Sources) or 112 (Hazardous Air Pollutants) of the FCAA and any physical change or change in the method of operations that is subject to the preconstruction review regulations promulgated under Parts C (Prevention of Significant Deterioration) and D (Plan Requirements for Nonattainment Areas) of Title I of the FCAA.

EPA, Region 10, has provided clarification with respect to the requirement to obtain an approval to construct or modify under 40 CFR 61.07 for radionuclide emitting sources. While the requirements to file an application, obtain EPA, approval and/or maintain certain records are applicable requirements, those requirements are not strictly Title V applicable requirements. Obtaining an approval to construct or modify under 40 CFR 61.07 does not by itself mean the change (for which that approval was obtained) is a Title I Modification.

WAC 246-247 is not federally enforceable. Therefore, a radioactive air emissions license issued under WAC 246-247 cannot be a Title I modification.

4. Does/do the proposed change(s) alter any existing AOP term or condition specifically addressing the following:
  - Monitoring (including test methods)
  - Recordkeeping
  - Reporting
  - Compliance certification requirements?  
Yes (to any) – Go to Minor Permit Modification Process  
No (to all) – Go to #5.
  
5. Does/do the proposed change(s):
  - Result in emissions that exceed those allowable under the AOP, whether expressed as a rate of emissions or in total emissions
  - Alter AOP terms that are necessary to enforce limitations on emissions from units covered by the AOP?  
Yes (to any) – Go to Minor Permit Modification Process.  
No (to both) – Go to Changes not Requiring a Permit Revision Process.
  
6. Is/are the proposed change(s):
  - Specifically addressed or prohibited by AOP terms or conditions
  - A Title 1 modification (footnote on page APP B-1) or subject to the acid rain requirements under Title IV of the *Federal Clean Air Act*
  - Does the proposed change weaken the enforceability of an existing AOP term or condition?  
Yes (to any) – Go to #7  
No (to all) – Go to Off-permit Change Process.
  
7. Does/do the proposed change(s) incorporate into the AOP the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, like new source review, that substantially are equivalent to the AOP approval process, including public, Tribes, affected states, and EPA review?  
Yes – Go to Administrative Permit Amendment Process  
No – Go to Significant Modification Process.

## AOP CHANGE PROCESSES

### SIGNIFICANT MODIFICATION PROCESS (WAC 173-401-725(4))

#### Hanford Site Actions

1. Submit complete notice of construction application with certification to the agency or agencies as a significant modification (the level of detail in the notice of construction application needs to be comparable to that for the original AOP application)
2. Prepare and submit a significant modification form (APP A-1) or a letter. In addition prepare a form for Ecology to use to notify the Administrator, Tribes, and affected states (APP A-7) as required under WAC 173-401-810 and 173-401-820
3. Permittee can make change only after issuance of the permit revision by the agency.

#### Agency Actions

1. Provide EPA a copy of permit application
2. Maintain and update permit register
3. Determine notice of construction application completeness
4. Prepare and publish public notices and/or public hearing
5. Conduct 30 day public and affected states review period
6. Respond to any public and affected state's comments, prepare responsiveness summary, and revise application accordingly
7. Provide to EPA for 45 day review
8. Issue within 15 days after EPA review/approval or deny change
9. Update and publish modified AOP as required
10. Complete review on the majority of significant AOP modifications within 9 months after receipt of a complete notice of construction application.

### MINOR PERMIT MODIFICATION PROCESS (WAC 173-401-725(2))

#### Hanford Site Actions [WAC 173-401-725(2)(a) through (b)]

1. Prepare a notice of construction application or a notice of construction revision form
2. Determine if the modification request is for group processing (refer to Group Processing Discussion)
3. Complete, certify, and submit a permit modification form for a Minor Permit Modification (APP A-3) with the underlying NOC application

4. Prepare and submit forms for Ecology to use to notify the Administrator, Tribes, and affected states (APP A-7) as required under WAC 173-401-810 and 173-401-820
5. Permittee can make change immediately after completion of Steps 3 and 4 provided that the NOC application has been reviewed and approved by the agency [WAC 173-401-725(2)(f)]
6. Permittee must comply with both the applicable requirements governing the change and the proposed terms and conditions until the agency takes final action [WAC 173-401-725(2)(f)].

Agency Action [WAC 173-401-725(2)(c) through (e)]

1. Within 5 working days of receipt of a complete AOP modification application, Ecology will meet its obligation under WAC 173-401-810 and 173-401-820 to notify the Administrator, Tribes, and affected states of the requested AOP modification. Ecology promptly will send any notice required under WAC 173-401-820(2) to the Administrator.
2. Concurrent with the notice to the Administrator, Tribes, and affected states, Ecology will submit to the AOP register a notice of each proposed minor AOP modification. Publication in the next available issue of the AOP register will signal the beginning of a public comment period of 21 days. Each notice must describe the proposed revisions and specify the deadline to file comments with Ecology on the proposed modification.
3. At the conclusion of the 21-day public comment period, resolve comments if any, and submit to EPA for 45-day review.
4. Within 90 days of Ecology's receipt of an application under minor permit modification procedures, or 15 days after the end of the Administrator's 45-day review period, whichever is later, Ecology will:
  - Issue the AOP modification as proposed
  - Deny the AOP modification application
  - Determine that the requested modification does not meet the minor AOP modification criteria and should be reviewed under the significant modification procedures
  - Revise the draft AOP modification and transmit to the Administrator the new proposed AOP modification as required by WAC 173-401-810.

**GROUP PROCESSING OF MINOR PERMIT MODIFICATIONS DISCUSSION**  
**[WAC 173-401-725(3)]**

Group processing of minor AOP modifications can be requested (APP A-5) for modifications that collectively are below the following thresholds:

- 10 percent of the emissions allowed by the AOP for the emission unit for which the change is requested
- 20 percent of the applicable quantity stated for a major source in WAC 173-401-200(17)
- 5 tons per year, whichever is least.

The advantage of group processing is that the modifications are held by the agency and added to the AOP as a single action, thus avoiding several, and possibly overlapping, public reviews. The permittee still is allowed to make the change immediately after a complete application (i.e., notice of construction application plus the completed forms) is filed, provided that the notice of construction application has been reviewed and approved by the agency [WAC 173-401-725(2)(f)].

The agency must complete the group processing AOP modification process within 180 days after receipt of the first group modification request or 15 days after the end of the Administrator's 45 day review/approval, whichever is later.

In addition to the requirements for filing a Minor Modification request (previously discussed), the group processing request needs to include a list of the permittee's other pending applications (i.e. NOC applications or NOC revision forms plus the completed forms) awaiting group processing, and a determination of whether the requested modification, aggregated with these other applications, equals or exceeds the threshold.

### **ADMINISTRATIVE PERMIT AMENDMENT PROCESS (WAC 173-401-720)**

#### Hanford Site Actions

1. For administrative amendments to the AOP that do not seek to change a NOC approval condition, request the administrative amendment via a letter (certification not required). For administrative amendments that seek to change an AOP Attachment 1 NOC approval condition, use the NOC revision form on page APP A-10. For administrative amendments that seek to change an AOP Attachment 2 NOC approval condition, use the NOC revision form on page APP A-11.
2. Seek consensus with the agencies before submittal of the request
3. Permittee can make change immediately on submittal of the request to Ecology and WDOH, as appropriate [WAC 173-401-720(3)(c)].

#### Agency Actions [WAC 173-401-720(3)(a) through (b)]

1. Ecology will take no more than 60 days from receipt of a request to take final action on such request, and could incorporate such changes without providing notice to the public or affected states provided that Ecology designates any such AOP revisions as having been made pursuant to this paragraph [WAC 173-401-720(3)(a)]
2. Ecology will submit a copy of the revised AOP to the Administrator.

### **CHANGES NOT REQUIRING A PERMIT REVISION PROCESS (WAC 173-401-722)**

#### Hanford Site Actions [WAC 173-401-722(1)(a)(iv), (1)(b), (2)(a) and (5)]

1. Prepare and submit a written notification that includes a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any AOP term or condition that is no longer applicable as a result of the change (APP A-8)
2. Seek consensus with the agencies before submittal of the request

3. Provide EPA and WDOH, as appropriate, plus Ecology with a notification at least 7 days before making change
4. Attach each notice to the record copy of the relevant AOP
5. Comply with applicable preconstruction review requirements
6. Permittee can make change 7 days after submittal of the request to Ecology and, as appropriate, WDOH.

Agency Actions

1. Review and concur (or deny) proposed changes within 3 working days after receiving the submittal
2. Ecology will attach each notice to its copy of the relevant AOP

**OFF-PERMIT CHANGE PROCESS (WAC 173-401-724)**

Hanford Site Actions [WAC 173-401-724(3), (5) and (6)]

1. Prepare Off-Permit Request Form (APP A-9), and submit to Ecology and WDOH, as appropriate, plus the EPA
2. Keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the AOP, and the emissions resulting from those changes
3. Comply with applicable preconstruction review requirements
4. Permittee can make change immediately on submittal of the request to Ecology and EPA, and, as appropriate, WDOH.

Agency actions

1. Review and concur (or deny) proposed changes within 3 working days after receiving the submittal
2. Changes incorporated into the AOP at the next AOP revision subject to public review.

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