



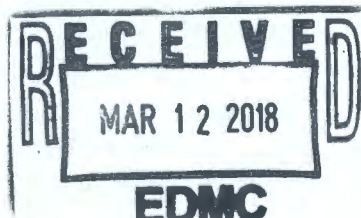
STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

March 8, 2018

18-NWP-042

Mr. Brian Vance, Manager  
Office of River Protection  
United States Department of Energy  
PO Box 450, MSIN: H6-60  
Richland, Washington 99352



Re: Follow-up letter regarding requested items identified in letter 17-NWP-139 for Air Operating Permit (AOP) Discharge Points 1.4.32

1246848

Dear Mr. Vance:

In letter 17-NWP-139, the Department of Ecology (Ecology) identified and requested additional documents that were not initially submitted as part of a May 25, 2017, compliance inspection for AOP discharge point 1.4.32. Because these documents were not initially submitted, the discharge point was determined to be in intermittent compliance.

All requested items have since been submitted and compliance was able to be demonstrated for the respective conditions provided herein. Therefore, Ecology has changed its determination from intermittent compliance to **continuous compliance** for AOP discharge point 1.4.32. Please see below for details of compliance determination.

**1.4.32 241-AP, 241-SY, and 241-AY/AZ Ventilation**

- **No records were submitted for the SY Farm as Washington River Protection Solutions (WRPS) and United States Department of Energy (USDOE) informed me that -The 241-SY Tank Farm Ventilation Upgrade Project has been placed in an "On Hold" status due to TOC priorities and funding restrictions. Ecology will set up a meeting with USDOE/WRPS to discuss the status of the upgrades.**
- **Requested item in letter 17-NWP-139 for Condition - Visible Emissions shall not exceed 5% opacity:**
  - **Provide Ecology with maintenance records of abatement technology for SY and AY/AZ Tank Farms as required in Section 2.4.5 of the NOC DE11NWP-001, Rev. 4 or provide records of tank operations in order to determine if condition this condition applies.**
    - *In meeting with USDOE/WRPS on 01/30/18, I observed maintenance records for 241-AY/AZ which included aerosol tests that show the respective HEPA filters met performance standards. The HEPA filter for AZ (1A) was replaced on 02-24-12.*
    - *The above satisfies Ecology's request and demonstrates compliance with this condition.*



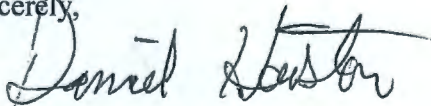


- **Requested items in letter 17-NWP-139 for Condition - Volatile organic compounds emissions shall not exceed amounts in table 1 of DE11NWP-001, Rev. 4 for the 241-AP, 241-SY, and 241-AY/AZ ventilations systems.**
  - *As requested, VOC emission assessment was provided for the AY/AZ Farm. The assessment states the total VOC emission from 1/1/2016 to 5/31/2017 was 0.13507 tons/year, which is well below the established limit of 3.3 tons/year. The records indicate quarterly samples were taken as required but the emission assessments were not performed quarterly. For future reference, and as stated in Section 3.2 of DE11NWP-001, Rev. 4, VOC emissions shall be assessed quarterly.*
  - *The above satisfies Ecology's request and demonstrates compliance with this condition.*
  
- **Requested items in letter 17-NWP-139 for Condition - All TAPs shall be below their respective ASIL or approved through a Second Tier review.**
  - **Provide (Sampling and Analysis Plan (SAP) for SY Farm or provide operational records for tank farms to determine if or when this condition applies.**
    - *As requested, SAPs were submitted for AY/AZ and AP Farm.*
    - *The above satisfies Ecology's request and demonstrates compliance with this condition.*
  - **Provide supporting data from 01/01/17 to 05/25/17 for the additional TAPs as described above and in respective SAPs as required in Section 2.4.4 for AP, SY, and AY/AZ Farm.**
    - *I observed the requested supporting TAPs data for AP and AY/AZ Farm in a meeting with WRPS on 02/20/2018.*
    - *It is recommended to provide written example of the assessment calculations provided in Excel spreadsheet to support demonstration compliance with ASILs or emission limits in future submittals.*
    - *The above satisfies Ecology's request and demonstrates compliance with this condition.*
  - **Provide Ecology with justification what tank operations would be subject to Condition 3.5 in DE11NWP-001, Rev. 4.**
    - *A white paper was submitted to Ecology regarding applicability of Section 3.5 which satisfies Ecology's request.*
  
- **Requested item in letter 17-NWP-139 for Condition - Ammonia shall not exceed amounts listed in Table 2 (DE11NWP-001, Rev. 4) from the 241-AP, 241-SY, and 241-AY/AZ ventilation systems.**
  - **Provide Ecology with the results of quarterly ammonia emission assessments from 01/01/15 to 05/25/17 for SY and AY/AZ tank farms.**

- *As requested, quarterly ammonia emission assessments were provided for the AY/AZ Farm which indicate that quarterly emissions were below the permitted limit of 19.6 lbs/24-hrs.*
  - *The above satisfies Ecology's request and demonstrates compliance with this condition.*
- **Requested item in letter 17-NWP-139 for Condition - Operational limits – Normal Double-Shell Tank (DST) primary ventilation system flow rates during Normal Operations (e.g. storage, retrieval, and sampling) are shown below. The maximum flow rates for the DST ventilation systems covered by this Order shall not exceed ventilation rates for Maximum Operations.**
  - **Provide Ecology with system stack flow rates that are adjusted to standard temperature and pressure for AP, AY/AZ and SY Farms from 01/01/2015 to 05/25/17.**
    - *In a meeting on 01/30/18, WRPS/USDOE clarified that system stack flow rates are adjusted to standard temperature and pressure. The units in the originally provided records were mislabeled.*
    - *As requested, stack flow rates were provided for AP and AY/AZ Farm. The flow rates records for the AY/AZ Farm show ventilation rates remained below the established 1,000 scfm for maximum operations. Likewise, the flow rate records for the AP Farm (upgraded) show ventilation rates remained below the established limit of 3,000 scfm for maximum operations.*
    - *The above satisfies Ecology's request and demonstrates compliance with this condition.*

If you have any questions, please contact me at [daniel.heuston@ecy.wa.gov](mailto:daniel.heuston@ecy.wa.gov) or (509) 372-7895.

Sincerely,



Daniel Heuston, PE  
Environmental Engineer 3  
Nuclear Waste Program

mrb

cc: See page 4



Mr. Brian Vance  
March 8, 2018  
Page 4 of 4

18-NWP-042

cc electronic:

Dave Einan, USEPA  
Katie McClintock, USEPA  
Bryan Timberger, USDOE-ORP  
Chris Kemp, USDOE-ORP  
Eric Faust, USDOE-RL  
James Hamilton, WRPS  
Reed Kaldor, MSA  
Jon Perry, MSA  
ERWM Staff, YN  
Ken Niles, ODOE  
John Martell, WDOH

Philip Gent, Ecology  
Daniel Heuston, Ecology  
Lilyann Murphy, Ecology  
Ron Skinnarland, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
USDOE-ORP Correspondence Control  
USDOE-RL Correspondence Control  
WRPS Correspondence Control

cc: Robin Priddy, BCAA  
Matt Johnson, CTUIR  
Jack Bell, NPT  
Rose Longoria, YN  
Susan Leckband, HAB  
Administrative Record  
NWP Central File