



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

December 20, 1993

Mr. James D. Bauer
Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Bauer:

Re: Notice of Construction (NOC) Permit for Nonradioactive Air Emissions
From the Process Effluent Treatment Facility (ETF)

Your application to construct and operate the ETF at the Hanford Site was received by the Department of Ecology's Nuclear and Mixed Waste Management Program on February 12, 1993.

We have received comments from Mr. Jeff Luke on June 14, 1993 and Steve Stites on October 27, 1993 on the draft ETF permit.

The approval of this application is attached for your use. Failure to meet the approval conditions may result in the revocation of this permit, the issuance of Notices of Violation, the imposition of civil penalties, and other civil or criminal actions as provided for in Chapter 70.94 RCW.

If you or your staff have any questions regarding this permit, please call me at (206) 407-7147.

Sincerely,

Robert C. H. King, P.E.
Chemical Engineer
Nuclear and Mixed Waste Management Program

cc: Steve Stites, USDOE
Jeff Luke, WHC ✓



Comments Regarding
NO. NOC-93-3 APPROVAL OF NOC APPLICATION FOR
NONRADIOACTIVE AIR EMISSIONS

1.) Condition (1), line 61:

Comment

It is requested that stream identifier G6 be changed to G8.

Rationale

Stream G6 feeds into a "header" stream, G8. It does not terminate at the stack. Sampling and monitoring capabilities have been designed for stream G8 which feeds the stack, the point of discharge to atmosphere. Therefore, no sampling/monitoring capabilities have been designed or planned for stream G6.

2.) Condition (2), lines 66 through 72:

Comment

It is requested that Condition 2, lines 66 through 72, be deleted.

Rationale

- This condition requires, "performance tests for VOC at the location of G6".
- The T-BACT assessment, submitted with the application, concluded that no controls were required for VOCs.
- Lines 53 through 56 of the NOC approval state, "The proposal does not include controls for organic and inorganic vapors, because the emissions will be very small, and the cost of the potential controls would be too high. After having reviewed the NOC application the department has determined the proposal meets the best available control technology for air toxics (T-BACT)."
- Therefore, Ecology has agreed there will be no controls for VOCs (organic vapors), as stated in the application. If there will be no controls for VOCs, there can be no performance tests for VOC controls.

3.) Condition (4), lines 75 through 81:

Comment

It is requested that in lines 75 and 76 the words, "...all equipment that has the potential to affect emissions to the atmosphere" be deleted and replaced with, "particulate emissions control equipment".

Rationale

- This condition requires RL to, "develop and comply with an operation and maintenance manual for all equipment that has the potential to affect emissions to the atmosphere".
- Ecology approved a system that provides controls only for particulates with no controls for gases (organics). (Please see lines 52 through 56 of the approval.)
- Therefore, this condition should clearly state that any maintenance plan and schedule should be relevant only to the controls for particulates - the airborne emissions control system mandated by Ecology.

Comment

It is requested that in line 81 the words, "for approval" be deleted.

Rationale

- Lines 77 through 80 of the approval state, "Energy shall also develop and follow an operation and maintenance plan to implement procedures and control methods described in the NOC application as T-BACT prior to start-up of any new or modified emission units or process equipment, *in accordance with WAC 173-460-040(8) dated June 18, 1991.*" (emphasis added.)
- Washington Administrative Code (WAC) 173-460-040(8), "Operation and maintenance plan", states that, "...the authority may require a plan for the operation and maintenance of all equipment and procedures to assure continuous compliance with this chapter. (a) A copy of the plan shall be filed with the authority upon request."
- WAC 173-460-040(8) gives Ecology the authority to request an operation and maintenance plan. The regulation does not state that Ecology has the authority to approve the plan.

4.) Condition (8), line 91:

Comment

On line 91, following the words, "by the" it is requested that the words, "appropriately trained" be added and that following the word, "department" the word, "personnel" be added.

Rationale

Without the addition of the suggested words, the condition may be construed to require RL to allow Ecology personnel access to facilities

without proper or adequate safety training, simply upon the request of the individual representing Ecology.

Lines 92 and 93 then state, "Failure to allow access is grounds for enforcement action." If, then, it is determined that an Ecology representative requesting access to a facility does not have adequate or appropriate safety training, RL would be open to enforcement actions if the representative persists in requesting access.

5.) Condition (9), lines 94 and 95:

Comment

On line 94, delete the words, "in the designs of" and after the word, "system" add, "which may result in an increase of TAPs emissions".

Rationale

- The condition requires RL to notify Ecology prior to "any changes in the designs of the proposed air emission control system". Further, the condition states, "Based on the notification, the department will make a determination whether a new approval or a modification of this final approval is required."
- This condition is not in agreement with WAC 173-460-020(14) and WAC 173-460-040(1)(c).
 - WAC 173-460-020(14) states, "'New toxic air pollutant source' means...Addition to, enlargement, modification, replacement, or any alteration of any process or air pollutant source which may *increase* (emphasis added) emissions..."
 - WAC 173-460-040(1)(c) states, " New source review of a modification is limited to the emission unit or units proposed to be modified and the emission unit or units whose emissions of TAPs may *increase* (emphasis added) as a result of the modification."
 - Both of the above cited sections of WAC 173-460 clearly relate the requirement to notify Ecology of proposed changes to a source to a potential *increase* in emissions of a regulated pollutant.

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Author	Addressee	Correspondence No.
R. C. H. King, Ecology (J. J. Luke, WHC)	J. D. Bauer, RL	Incoming:9400826 XRef:9360227D

Subject: NOTICE OF CONSTRUCTION PERMIT FOR NONRADIOACTIVE AIR EMISSIONS FROM THE PROCESS TREATMENT FACILITY (ETF)

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