

Hanford Federal Facility Agreement and Consent Order
Change Control Form M-43-97-04
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Description/Justification (cont.)

During the week of November 3, 1997, the Washington Department of Health (WDOH) and the U.S. Environmental Protection Agency (EPA) conducted a joint National Emissions Standard for Hazardous Air Pollutants (NESHAPs) audit of the major radioactive air emissions units located at the Hanford Site. In response to preliminary audit findings presented during the November 5, 1997, exit briefing a technical basis package was prepared and transmitted to WDOH and EPA on December 1, 1997. Results of the audit were issued by WDOH in a December 5, 1997, letter report, including several Notices of Correction. Specific to the Project W-030 702-AZ ventilation system, a Notice of Correction was issued against the 296-A-42 Stack sampling system for non-compliance with 40 CFR 61, WAC 246-247 and ANSI N13.1.

It is RL's intent to obtain Notice of Construction resolution with WDOH and EPA prior to initial operation of the 702-AZ ventilation system, provided by Project W-030. The WDOH has advised that although it recognizes that RL has diligently pursued obtaining air discharge permits, staff resources at WDOH are insufficient to support review of RL's response documents and resolve the outstanding Notice of Correction by December 31, 1997. WDOH advises it could take up to 90 days to complete that process. DOE-RL is, therefore, requesting an extension to the Milestone due dates as specified above.

