



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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December 17, 2019

19-NWP-196

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

Re: Approval of Current Waste Treatment Plant Environmental Performance Demonstration  
Test to Demonstrate Compliance with Approval Order DE02NWP-001, Revision 2

Dear Brian T. Vance:

The Department of Ecology (Ecology) reviewed the Environmental Performance Demonstration Test (EPDT) Plan for the Low Activity Waste (LAW) section of the Waste Treatment Plant to determine if it is suitable to demonstrate compliance with Approval Order DE02NWP-001, Revision 2. This analysis was specific to EPDT Plan version 24590-LAW-PER-CTST-17-001, Revision 0, signed August 23, 2017.

Approval Order DE02NWP-001, Revision 2, Condition 2.1.1.1 limits opacity of emissions from LAW stacks. Condition 3.0 limits total emissions from the activities described in the application, which includes the LAW stacks. Condition 4.0 requires the permittee to demonstrate initial compliance through a performance demonstration conducted per an Ecology approved Performance Demonstration Plan.

Testing performed in accordance with 24590-LAW-PER-CTST-17-001, Revision 0, is capable of demonstrating compliance with the above limits for emissions from the LAW stack and meets testing requirements specified in the Approval Order. Therefore, Ecology is approving the EPDT Plan for this purpose.

Any future modifications of the EPDT Plan or Approval Order could invalidate the underlying analysis and, therefore, would require additional review. Testing which is not performed to the EPDT Plan could also invalidate this analysis and would require additional review.

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If you have any questions, please contact Lilyann Murphy, Lead Air Engineer, at (509) 372-7951 or [lilyann.murphy@ecy.wa.gov](mailto:lilyann.murphy@ecy.wa.gov), or Daniel Heuston, Environmental Engineer, at (509) 372-7895 or [daniel.heuston@ecy.wa.gov](mailto:daniel.heuston@ecy.wa.gov).

Sincerely,



Theresa Howell  
Acting Waste Management Section Manager  
Nuclear Waste Program

mfw/jlg

cc electronic:

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Hanford Facility Operating Record  
BNI Correspondence Control  
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USDOE-ORP Correspondence Control  
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Hanford Administrative Record  
NWP Central File