



Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

0034457

9401530

94-RPS-100

JAN 06 1994

Mr. David Bradley, Supervisor  
Operating Permits Section  
State of Washington  
Department of Ecology  
Post Office Box 47600  
Olympia, Washington 98504-7600



Dear Mr. Bradley:

AIR OPERATING PERMIT PROGRAM

The State of Washington air operating permit program was established in the Washington Administrative Code (WAC) 173-401 on October 4, 1993. The regulation was included in the state's submittal to the U.S. Environmental Protection Agency (EPA) for delegation of authority to implement the program provisions of Title V of the Federal Clean Air Act (CAA). In anticipation of the need to submit a permit applications for the Hanford Site, the U.S. Department of Energy, Richland Operations Office (RL), is preparing information for the permit applications. Because of the complexity of the Hanford Site, development of permit application information will require approximately 15 months of effort.

The State of Washington Department of Ecology (Ecology) has recently proposed a listing of insignificant emission units and provided instructions for reporting such emission units in permit applications per WAC 173-401-530, dated November 19, 1993. RL intends to prepare its permit application consistent with this proposed list and the instructions for reporting such insignificant emission units.

The proposed section in WAC 173-401-530 does not establish thresholds for Hazardous Air Pollutants (HAPs). However, several potential levels of significance have been proposed, including threshold levels to be established by the EPA under Section 112(g) of the CAA. The Office of Management and Budget is currently reviewing these proposed thresholds, which are expected to be listed in the *Federal Register* in early 1994. Until Ecology sets a level of significance, RL will provide information on HAP emission units based on the EPA, Section 112(g) level of significance in its permit application.



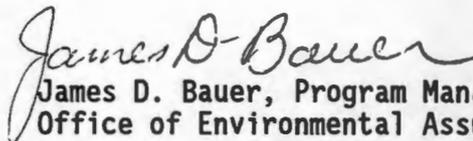
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No enforceable limits for new and existing toxic air pollutants (TAPs) have been established in the federal regulations, nor were thresholds for TAPs established under the proposed section in WAC 173-401-530. RL will continue to address requirements for new sources of TAPs through Notices of Construction under WAC 173-460, where applicable. In the absence of enforceable limits for existing TAPs, RL will not include TAPs for existing sources in the permit application.

We understand that Ecology is developing a specific checklist for establishing Ecology's position on completeness of the permit application. Individual meetings will be scheduled in the near future with the various stakeholder groups. RL looks forward to participating in this new development and appreciates notification of any changes to the original application form that was included in the delegation package to the EPA.

Should you have any questions regarding this transmittal, please call me or Mr. Steve Stites of my staff at (509) 376-8566.

Sincerely,

  
James D. Bauer, Program Manager  
Office of Environmental Assurance,  
Permits, and Policy

RPS:SDS

cc: L. P. Diediker, WHC  
B. G. Erlandson, WHC  
T. D. Chikalla, PNL  
A. S. Ikenberry, PNL  
A. W. Conklin, DOH  
J. S. Stohr, Ecology  
B. Brady, Ecology

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Author

Addressee

Correspondence No.

James D. Bauer, RL  
(W. E. Davis, WHC)

David Bradley, Ecology

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Subject: AIR OPERATING PERMIT PROGRAM

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