



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Richland Field Office

3100 Port of Benton Blvd., Richland, WA 99354 • 509-372-7950

May 1, 2025

25-NWP-063

Brian A. Harkins, Acting Deputy Manager  
Hanford Field Office  
United States Department of Energy  
PO Box 550  
Richland, Washington 99352

Re: Approval of Less Sensitive Method 29 Arsenic Testing in the 241-AP Tank Farm for  
DE19NWP-003

Dear Brian A. Harkins:

The Department of Ecology (Ecology) received the request to approve less sensitive testing for arsenic under Approval Order DE19NWP-003, Approval Condition 5.c.iii, which was submitted in Letter 25-ECD-0052 dated April 10, 2025. For annual Method 29 testing in the 241-AP Tank Farm, we are approving the proposed sampling and analysis with an arsenic detection limit that is equivalent to 90% of the Washington Administrative Code (WAC) 173-460-150 small quantity emission rate or better, rather than requiring sensitivity down to the de minimis emission value.

As a condition of this approval, we are requiring regular review of potential improvements in Method 29 sensitivity for arsenic be conducted and reported in conjunction with future Air Operating Permit (AOP) renewal applications (i.e., this approval is valid from today through the permit term for AOP Renewal 4 but would only be retained for the future Renewal 5 if still appropriate).

As noted in Letter 25-ECD-0052, this does not change the limit for arsenic identified in Table 3 of DE19NWP-003. Valid sampling results showing exceedance of 2.64E-03 pounds per year must be reviewed for excess emissions reporting under WAC 173-400-108 and -109.

With certain limitations, Ecology is also accepting the proposal to report excess emissions within 60 days of the end of the month in which sampling occurred, rather than waiting for the next monitoring report. Excess emissions which are related to a potential threat to human health or safety must be reported in accordance with WAC 173-500-108(1)(a) and deviations for the AOP must also be reported in accordance with AOP Standard Terms and General Conditions Section 5.6.

Brian A. Harkins  
May 1, 2025  
Page 2 of 2

25-NWP-063

If you have any questions or need additional information, please contact Matt Williams,  
Air Engineer Unit Lead, at (509) 380-1314 or [matt.williams@ecy.wa.gov](mailto:matt.williams@ecy.wa.gov).

Sincerely,

**Temple, John (ECY)** Digitally signed by Temple, John (ECY)  
Date: 2025.05.01 08:38:37 -07'00'

John Temple  
Waste Management Section Manager  
Nuclear Waste Program

mfw/lb

cc electronic:

Dave Einan, EPA  
Jim McAuley, EPA  
Briana Lindberg, USDOE  
Paul Pak, USDOE  
Bryan Trimberger, USDOE  
Thomas Beam, H2C  
Erwin Vickery, H2C  
Charleston Ramos, HMIS  
Mason Murphy, CTUIR  
Anthony Smith, NPT  
Alyssa Buck, Wanapum  
Laurene Contreras, YN  
ERWM Staff, YN  
Susan Coleman, HAB

Suzanne Dahl, Ecology  
Edward Holbrook, Ecology  
Marissa Merker, Ecology  
Shawn Nolph, Ecology  
John Pulsipher, Ecology  
Stephanie Schleif, Ecology  
Adam Shaffer, Ecology  
John Temple, Ecology  
Matt Williams, Ecology  
Environmental Portal  
Hanford Administrative Record: Air Permits  
H2C Correspondence Control  
HAB Correspondence Control  
HMIS Correspondence Control  
USDOE Correspondence Control