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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

December 4, 2007

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EDMC

Mr. David A. Brockman, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Department of Ecology 2007 Hanford Air Operating Permit Inspections

Reference: *Hanford Site Air Operating Permit Annual Compliance Certification Report for the Period January 1, 2006 through December 31, 2006*, DOE/RL-2007-04, Rev. 0, June 30, 2006. 0073854

Dear Mr. Brockman:

This letter transmits the results of inspections held on November 6-8, 2007, by the Department of Ecology of Hanford Site air emission sources regulated under Washington Administrative Code (WAC) 173-400, WAC 173-401, and WAC 173-460. In addition, this letter communicates Ecology acceptance of your 2006 compliance certification statements (see Reference).

Sixteen United States Department of Energy – Richland Operations (USDOE-RL) emission sources were selected for inspection based on current Air Operating Permit (AOP) Number 00-05-006 mega-site triennial compliance monitoring frequencies, opportunistic inspection capability, and verification of the calendar year 2006 Department of Energy AOP Compliance Certification. Our inspection findings are provided in Table 1 (see page 3).

We are pleased with the level of coordination and cooperation achieved regarding these inspections. All information requested was available during or promptly following the inspections. We find the facilities to be in compliance with existing AOP and Notice of Construction Approval Order requirements. However, two items require action.

The first item of action is that regarding operation of the N-1724K Maintenance Shop. Following inspection of facilities in November 2006, Ecology recommended that the USDOE-RL take action regarding the permitting status of the N-1724K Maintenance Shop. You have not installed or operated arc welding or paint booth operations authorized under Order 97NM-551.

In accordance with Chapter 173-400-110(9) Washington Administrative Code, Ecology finds that those portions of Order 97NM-551 dealing with arc welding and paint booth operations are void. Since the primary basis for the issuance of that permit was to support the welding and painting operations, approval under Order 97NM-551 is, hereby, withdrawn entirely.

The withdrawal of Order 97NM-551 does not inhibit your current woodworking or abrasive blasting operations nor require any further permitting of these operations at this location. You may continue to conduct these operations as insignificant emission units [WAC 173-401-530(1)(a) and WAC 173-401-532(55)] under the scope of the AOP and emission standards of WAC 173-400-040. You do not need to take action. Ecology will initiate amendment of the AOP to identify the removal of Order 97NM-551 from the AOP. Should you wish to appeal the withdrawal of the authorization contained within Order 97NM-551 you may do so by application, within 30 days of receipt of this letter to:

Pollution Control Hearings Board
P.O. Box 40903
Olympia, Washington 98504-0903

Concurrently, copies of the application must be sent to:

Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

These procedures are consistent with the provisions of Chapter 43.21B of the Revised Code of Washington, and the rules and regulations adopted thereunder.

The second item of action is that of your inactive asbestos waste disposal trenches in the 600 Area. The standard of 40 CFR §61.151(a)(3) requires establishment and maintenance of an appropriate cover to prevent exposure of asbestos containing waste. Our inspection did not indicate that asbestos waste is presently exposed. However, subsidence of the cover material presents the possibility of incipient violation of the cover standard. We require that you repair the cover material areas of subsidence associated with asbestos waste disposal trenches and advise Ecology of the completion of these repairs by May 31, 2008. In assigning this date for cover repair completion, Ecology has considered the seasonality of the work scope and potential re-vegetation. Should you believe that your repairs cannot be completed by May 31, 2008, please request extension by March 3, 2008. The extension request must provide the justification of your request in terms of schedule and/or resource limitations, and include a description of your interim actions to assure that your repair delays will not result in violation of the cover standard.

Your 2006 AOP compliance certification (see Reference) has been reviewed by Ecology, Washington State Department of Health, and Benton Clean Air Authority. Additional inspections and documentary review have been completed where determined necessary to verify your claims of compliance. As the permitting authority for AOP permit 00-05-006, Ecology hereby accepts all compliance certification statements within DOE/RL-2007-04, Rev. 0.

If you have any questions, please contact me at 509-372-7983.

Sincerely,

Doug Hendrickson, P.E.
Lead Air Engineer
Nuclear Waste Program

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cc: See page 4

Table 1: Facilities Inspection List

NOC Permit	Facility Description	Inspection Results
	E-225BC 001	Compliant
	E-225BG 001	Compliant
NWP-96-1	E-282ED 001 & E-282WD 001	Compliant
	283-W Water Treatment Plant	Compliant
	E-1450 001	Compliant
DE02NWP-001	Emergency Diesel Generators	Compliant
	E-WSCF 001	Compliant
97NM-138	ESPC Boilers	Compliant
DE00NWP-002. Rev 1	J-CWC 001	Compliant
97NM-551	N-1724K 001 Maintenance Shop	Compliant. Permit withdrawal.
DE01NWP-002 Rev 1	T-Plant Complex	Compliant
DE98NWP-004	EP-325-01-S Hazardous Waste Treatment Unit	Compliant
NWP95-329/300A	EP-329-01-S Chemical Sciences Laboratory	Compliant
	Hanford Site Asbestos Landfill	Compliant
	G-6290, Gasoline Distribution	Compliant
DE06NWP-001	E-85 Fueling	Compliant

cc: Don Dossett, EPA
Laurie Kral, EPA
Cliff Clark, USDOE-RL
Mary Jarvis, USDOE-RL
Tom Beam, FH
Patrick Weiher, JCI
Joel Williams, FH
Rodger Woodruff, PNNL
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
David Lauer, BCAA
Ken Niles, ODOE
John Martell, Health
Administrative Record H-0-9
Environmental Portal