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**STATEMENT OF BASIS  
FOR  
HANFORD SITE AIR OPERATING PERMIT NO. 00-05-006  
2013 REVISION A**

**State of Washington Department of Ecology  
State of Washington Department of Health  
Benton Clean Air Agency**

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1 Health regulates radioactive air emissions under the authority of RCW 70.92, WAC 173-480,  
2 and WAC 246-247; and Benton Clean Air Agency (BCAA) regulates asbestos and outdoor  
3 burning under delegation from Ecology.

4 The Hanford Site AOP was initially issued on June 18, 2001, in accordance with WAC 173-401,  
5 covering the 5-year operating period from July 2, 2001 to July 1, 2006. Renewal 1 was issued on  
6 December 29, 2006 covering the 5-year operating period from January 1, 2007 to December 31,  
7 2011. Ecology, Health and BCAA initiated AOP renewal activities approximately 18 months  
8 before the December 31, 2011 expiration date. The U.S. Department of Energy (US DOE)  
9 submitted application materials and on August 12, 2011, the permitting agencies accepted the  
10 renewal application as complete.

11 The AOP renewal processes are subject to the same procedural requirements that apply to initial  
12 permit issuance, including those for public participation, affected state and EPA reviews.  
13 [WAC 173-401-710(2)]

14 Definitions used in this Statement and the AOP are incorporated by reference from WAC 173-  
15 401-200, WAC 173-400-030, WAC 173-460-020, WAC 246-247-030, and those specified under  
16 BCAA Regulation 1 (and/or incorporated by reference therein). Specific definitions unique to  
17 this Statement and the AOP include the following:

- 18 • Discovery – qualitative determination that a potential threat to public health or safety  
19 exists or existed after an evaluation of pertinent information.
- 20 • Permitting Authority and Permitting Agencies – for the Hanford Site AOP, Ecology is the  
21 permitting authority as defined in WAC 173-401-200(23). Ecology, Health and BCAA  
22 are all permitting agencies with Ecology acting as the lead agency. Health and BCAA  
23 authorities are described in the Statements of Basis for Attachments 2 and 3.
- 24 • Significant emission unit or activity - for regulated air pollutants, excluding  
25 radionuclides, this is an emission unit that does not meet the criteria of IEUs as described  
26 in WAC 173-401-530.

27 The Ecology and Health Statements of Basis are non-enforceable, but supporting reference  
28 documents that provide a rationale for the development of the permit and offers clarification  
29 where deemed necessary. The terms “permit” and “license” are synonymous; when a  
30 requirement pertains to compliance with the AOP the term “permit” will be used, while when a  
31 requirements references a WAC 246-247 action the term “license” will be used.

32 The effective period of the 2013 AOP renewal (renewal 2) covers the five-year period from April  
33 1, 2013 to March 31, 2018. The effective reporting periods for annual reports will be from  
34 January 1 to December 31. For semi-annual reports, the reporting periods will be from January 1  
35 to June 30 and from July 1 to December 31. [WAC 173-401-610]

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1    **1.0           LIST OF ABBREVIATIONS**

2	ALARACT	As low as reasonably achievable control technology
3	AOP	Air Operating Permit
4	BACT	Best available control technology
5	BCAA	Benton Clean Air Agency
6	CAA	Clean Air Act
7	CERCLA	<i>Comprehensive Environmental Response, Compensation and Liability Act of 1980</i>
8	CFR	Code of Federal Regulations
9	DOE-ORP	U.S. Department of Energy, Office of River Protection
10	DOE-PNSO	U.S. Department of Energy, Pacific Northwest Site Office
11	DOE-RL	U.S. Department of Energy, Richland Operations Office
12	DST	Double-shell tanks
13	Ecology	State of Washington, Department of Ecology
14	EFSEC	Energy Facility Site Evaluation Council
15	EPA	U.S. Environmental Protection Agency
16	FCAA	Federal Clean Air Act
17	GHG	Greenhouse gasses
18	Health	State of Washington, Department of Health (also referred to as DOH)
19	HEPA	High-efficiency particulate air (filter)
20	IEU	Insignificant emission unit
21	MEI	Maximally exposed individual
22	MOA	Memorandum of agreement
23	MOU	Memorandum of understanding
24	NAAQS	National Ambient Air Quality Standards
25	NESHAP	National Emission Standard for Hazardous Air Pollutants
26	NOC	Notice of construction
27	NRC	Nuclear Regulatory Commission
28	NSR	New source review
29	PCHB	Pollution Control Hearings Board
30	PM-10 or PM10	Particulate matter less than or equal to 10 microns in size
31	PNNL	Pacific Northwest National Laboratory
32	PSD	Prevention of significant deterioration
33	PTRAEU	Portable/temporary radioactive air emission unit
34	R&D	Research and development
35	RACT	Reasonably available control technology
36	RCHC	Richland Central Area
37	RCHN	Richland North Complex
38	RCW	Revised Code of Washington
39	Statement	Statement of Basis
40	TAPs	Toxic air pollutants
41	TSD	Treatment, storage and/or disposal
42	VOC	Volatile organic compound
43	WAC	Washington Administrative Code

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## 1   **2.0           GENERAL HANFORD SITE INFORMATION**

2   The Hanford Site is included in the *Federal Clean Air Act* (FCAA) Title V AOP Program  
3   because it is a “major source” as defined in the Federal Clean Air Act Section 112. Section 112  
4   defines the term “major source” as “any stationary source or group of stationary sources located  
5   within a contiguous area and under common control that emits or has the potential to emit  
6   considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or  
7   25 tons per year or more of any combination of hazardous air pollutants.”

8   When a facility or entity is located on the Hanford Site, the presumption is that the facility or  
9   entity is under the control of one of the DOE Hanford Site operations offices that control waste  
10   management and restoration operations on the Hanford Site, specifically, under the control of the  
11   Richland Operation Office (DOE-RL), the Office of River Protection (DOE-ORP), or the Office  
12   of Science (DOE-PNSO). Several entities operating on or near the Hanford Site under a contract  
13   or lease and are not under DOE control. The presumption of common control may be overcome  
14   and DOE Hanford Site operations offices may seek to exclude an entity from the Hanford Site  
15   AOP on a case-specific basis. The final decision is made and approved by Ecology with  
16   agreement from EPA.

17   In general, the following criteria will be used by Ecology and/or EPA to determine whether a  
18   source is to be included in the Hanford Site AOP.

- 19       1. Is the percentage of the entity's output provided to DOE Hanford Site operations offices  
20       greater than 50%?
- 21       2. Do the lease/contract terms indicate that DOE Hanford Site operations offices will  
22       control the entity?
  - 23           a) What do the lease/contract terms indicate with regard to pollution control/permitting  
24           responsibilities?
  - 25           b) Who accepts responsibility for compliance with air quality control requirements?
  - 26           c) Who accepts responsibility for violations of the requirements?
  - 27           d) Does DOE have the power to issue a stop-work order to the entity for incidents or  
28           conditions harmful to the environment?
  - 29           e) Does DOE exercise directing influence over the entities economic or other pollutant-  
30           emitting activities?
  - 31           f) Does DOE have the power to make or veto decisions to implement major emission-  
32           control measures or to influence production levels or compliance with environmental  
33           regulations?
  - 34           g) Does DOE control the performance of the entity?
- 35       3. Can DOE Hanford Site operations offices make decisions that affect the entity's pollution  
36       control technologies?
- 37       4. Does the entity share products, byproducts, equipment, other property, or pollution control  
38       equipment with DOE?
- 39       5. Does the entity share a common workforce, plant manager, security forces, corporate  
40       executive officers, payroll activities, employee benefits, health plans, retirement funds,  
41       insurance coverage, or other administrative functions with DOE or a DOE contractor?

1 There are a number of privatized commercial facilities, including a nuclear power plant, a research  
2 facility to study gravitational waves, and a commercial low-level radioactive waste burial site  
3 located within the boundaries of the Hanford Site. Ecology has concluded these activities are not  
4 under the common control of DOE Hanford Site operations offices, and, consequently these facilities are  
5 not part of the Hanford Site. [WAC 173-401-200(17)]

6 For sites with multiple types of entities and relationships, the EPA has also provided additional  
7 interpretive guidance for determining which sources are to be included as part of the major  
8 source to be addressed in an air operating permit<sup>1</sup>.

9 The following paragraphs are provided to support the determination to exclude those facilities  
10 and activities listed in Section 2.0 of the “Standard Terms and Conditions” portion of the  
11 Hanford Site AOP. All future excluded facilities and activities will also be guided by the process  
12 outlined above. The following have been determined to not be part of the Hanford major source.

13 • **PermaFix Northwest, Inc., Richland Facility**

14 PermaFix Northwest, Inc. (PFNW), formerly Pacific EcoSolutions, Inc. (PEcoS),  
15 operates a low-level radioactive and mixed waste decontamination, super compaction,  
16 and packaging disposal facility. The share of PFWN service output provided to DOE  
17 Hanford operations is currently less than 50%. A private entity outside the Hanford Site  
18 is not considered a “support facility” to DOE under the guidance on “common control” if  
19 the percentage of the entity’s output or service provided to DOE is less than 50%. Based  
20 on the current mode of operation, PFWN is not included in the Hanford Site Title V  
21 AOP.

22 • **UniTech Services Group**

23 UniTech Services Group, formerly Interstate Nuclear Services (INS), provides cleaning  
24 and decontamination services for personnel protection clothing and respirator masks.  
25 INS was dependent on DOE as a Hanford Site spin-off operation in 1992 and 1993.  
26 However, INS solicited business from other DOE sites including the Idaho National  
27 Environmental Engineering Laboratory and the Sandia National Laboratory. The  
28 percentage of the entity’s service output provided to the Hanford Site currently is less  
29 than 50%; and the trend appears to be stabilizing for the foreseeable future at about 30%.  
30 An entity outside the Hanford Site is not considered a ‘support facility’ to DOE under the  
31 guidance on ‘common control’ if the percentage of the entity’s output provided to the  
32 Hanford Site is less than 50%. Based on the current mode of operation, INS is not  
33 included in the Hanford Site Title V AOP.

34 • **Pacific Northwest National Laboratory (PNNL) Operated by Battelle Memorial  
35 Institute**

36 Battelle Pacific Northwest operates a multi-program laboratory research and development  
37 (R&D) center. Both investigative research and design development activities are  
38 conducted within the Richland North Complex (RCHN). Activities are distributed  
39 among analytical studies (paper studies); software development; hardware development;  
40 hardware design, development, and testing [e.g., instrumentation, robotics, sensors, laser  
41 systems, nondestructive examination (NDE), etc.]; energy systems design, analysis and

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<sup>1</sup> EPA Guidance “Questions and Answers on the Requirements of Operating Permits Program Regulations, July 7, 1993,” and later correspondence on common control issues.

1 monitoring; and laboratory-based investigative scientific research. The RCHN  
2 accommodates a client base that involves government agencies and private business as  
3 well as foreign and domestic clients. The percentage of the entity's service output  
4 provided to the Hanford Site is currently less than 50%. An entity outside the Hanford  
5 Site is not considered a 'support facility' to DOE under the guidance on 'common  
6 control' if the percentage of the entity's output provided to the Hanford Site is less than  
7 50%. Based on the current mode of operation, the RCHN is not included in the Hanford  
8 Site Title V AOP.

9 • **Applied Process Engineering Laboratory**

10 The Applied Process Engineering Laboratory (APEL) was a joint project with the DOE,  
11 the City of Richland, the Port of Benton, and Energy Northwest. Currently APEL is  
12 owned and operated by Energy Northwest, has its own RCRA Part B permit, and obtains  
13 its own BCAA permits. APEL tests and develops new technologies that can be used in  
14 Hanford Site cleanup, as well as provides an incubator for entrepreneurs who want to  
15 establish technology-based businesses. APEL is not under the 'common control' of  
16 DOE, therefore it is not included in the AOP.

17 • **The Laser Interferometer Gravitational-Wave Observatory**

18 The Laser Interferometer Gravitational-Wave Observatory (LIGO) is a research facility  
19 on the Hanford Site funded by the National Science Foundation (NSF). LIGO was  
20 designed and is being constructed by a team of scientists from the California Institute of  
21 Technology and the Massachusetts Institute of Technology for the purpose of detecting  
22 cosmic gravitational waves and harnessing these waves for scientific research. LIGO  
23 does not supply any DOE related services, and is not under the 'common control' of  
24 DOE, therefore it is not included in the AOP.

25 • **Energy Northwest Facilities**

26 Energy Northwest is a commercial producer of electrical power. It does not supply any  
27 direct DOE related services, and is not under the 'common control' of DOE. This  
28 category includes Bonneville Power Administration (BPA). Facilities leased from  
29 Energy Northwest, by DOE/RL contractors supporting DOE/RL work, would be  
30 considered to be under the common control of DOE.

31 • **All Port of Benton Facilities**

32 The Port of Benton is an economic development agency in Benton County. DOE has  
33 transferred ownership of several parcels of land and several facilities in the 3000, 400,  
34 and 1100 Areas of the Hanford Site to the Port of Benton. The Port of Benton will make  
35 the existing infrastructure and buildings available for new business and industry. The  
36 Port of Benton is not under the 'common control' of DOE, but the leased portion to  
37 Bechtel, Inc. for Waste Treatment Plant equipment laydown is considered a Hanford  
38 insignificant emission unit. The Port of Benton Facilities are not considered to be under  
39 the 'common control' of DOE, therefore they are not included in the AOP.

40 • **US Ecology, Inc. Commercial Low-Level Radioactive Waste Burial Site**

41 US Ecology operates a commercial low-level radioactive waste burial site for the State of  
42 Washington on land leased from DOE. This burial site receives low-level waste from  
43 commercial organizations, does not supply any DOE related services, and is not under the  
44 'common control' of DOE, and therefore it is not included in the AOP.

1       • **Kaiser Aluminum and Chemical Corporation Extrusion Press Located in the 1100**  
2       **Area**

3       Kaiser Aluminum, formerly Kaiser Aluminum and Chemical Corporation, produces  
4       aluminum baseball bats for sale to the general public, does not supply any DOE related  
5       services, and is not under the ‘common control’ of DOE, and therefore it is not included  
6       in the AOP.

7       • **AREVA NP**

8       AREVA NP, formerly Framatome-ANP and Siemens Power Corporation before that,  
9       operates a commercial nuclear fuel fabrication facility near the southern boundary of the  
10      Hanford Site. The AREVA NP facility does not supply any DOE related services, and is  
11      not under the ‘common control’ of DOE, and therefore it is not included in the AOP.

12      • **Tri-City and Olympia Railroad**

13      DOE signed a lease in March 1998 with Livingston Rebuild Center, Inc., a major railroad  
14      locomotive repair firm from Livingston, Montana, for about one quarter of the Hanford  
15      Site 1171 Transportation Maintenance Building. This land and facilities were sold by  
16      DOE to the Port of Benton in 2001. Tri-City and Olympia Railroad assumed control of  
17      the Livingston Rebuild Center facilities in 2005 under lease from the Port of Benton. Tri-  
18      City and Olympia Railroad manages the Port of Benton short line rail with access to  
19      Burlington Northern Santa Fe and Union Pacific. The company is not under the  
20      ‘common control’ of DOE, and therefore it is not included in the AOP.

21      • **PN Services**

22      PN Services is a subsidiary of Westinghouse Electric Company, specializing in chemical  
23      cleaning, chemical decontamination, and related chemical and waste processing services  
24      for the nuclear industry. PN Services originally was formed in May 1983 as the PN  
25      Services division of Pacific Nuclear. In January 1992, Pacific Nuclear was renamed  
26      VECTRA Technologies and the PN Services division became the Plant Services Group  
27      of VECTRA. On June 30, 1995, the Plant Services Group was acquired by  
28      Westinghouse. This acquisition merged the chemical decontamination and chemical  
29      cleaning capabilities of Westinghouse and VECTRA Plant Services Group into a single  
30      company, PN Services. The company has an executive engineering office, service  
31      facility, and chemical laboratory in Richland, and a sales office and service facility in  
32      Spartanburg, South Carolina. The company is not under the ‘common control’ of DOE,  
33      and therefore it is not included in the AOP.

34      • **Environmental and Molecular Science Laboratory**

35      The Environmental and Molecular Sciences Laboratory (EMSL) is part of the Pacific  
36      Northwest National Laboratory operated by Battelle Memorial Institute in Richland,  
37      Washington. As previously discussed, PNNL is not included in the AOP.

38      • **Oasis Physical Therapy located at the Stevens Center**

39      This facility provides a service for workers of Hanford contractors and to the general  
40      public, does not supply any DOE related services, and is not under the ‘common control’  
41      of DOE, and therefore it is not included in the AOP.

42

43

1       • **Montessori School located at the Stevens Center**

2       This facility is a school for the general public, does not supply any DOE related services,  
3       and is not under the ‘common control’ of DOE, and therefore it is not included in the  
4       AOP.

5       • **Corporate Health Facility located at the Stevens Center**

6       This facility provides a service for workers of Hanford contractors and to the general  
7       public, does not supply any DOE related services, and is not under the ‘common control’  
8       of DOE, and therefore it is not included in the AOP.

9       • **Bulk Vitrification Testing Facility located across from Hammer in Richland**

10       A research and test demonstration facility was built by a contractor in pursuit of obtaining  
11       full approval of a method to treat low activity waste at the Hanford site. The facility was  
12       permitted by BCAA and is under its jurisdiction because the work was outside of the  
13       Hanford site. The test demonstrations facility is near the southern boundary of the  
14       Hanford Site across from Hammer. The facility does not supply any DOE related  
15       services, and is not under the ‘common control’ of DOE, and therefore it is not included  
16       in the AOP.

17       **3.0           EMISSION UNITS IDENTIFICATION**

18       Emission units subject to this permit are identified in Attachments 1 through 3 of the AOP.

19       **4.0           PERMIT PROVISOS**

20       All emission units within the Hanford Site AOP shall comply with all standard terms and  
21       conditions in WAC 173-401-620(2). The standard terms and conditions are applicable to all  
22       Chapter 401 (WAC 173-401) sources, including insignificant emission units, in the State of  
23       Washington.  
24

25       **Subsection 4.1** of the AOP identifies 40 CFR 70 permit shield that ‘shields’ the liability of an  
26       owner or operator of a source for approved operating conditions if the certified permit  
27       applications were true and accurate. Nothing in any 40 CFR 70 permit shall alter or affect the  
28       liability of an owner or operator of a source for any violation of applicable requirements prior to  
29       or at the time of permit issuance. [40 CFR 70.6(f)(3)(ii)].

30       The 1997 EPA Guidance [EPA Guidance on Title V Permit Shield Implementation, 4APT-ARB  
31       May 23, 1997, by EPA-4 Air & Radiation Technology Branch Chief R. Douglas Neeley]  
32       summarized EPA’s position on the appropriate implementation of the Title V permit shield. The  
33       State of Washington maintains the same position as indicated in WAC 173-401-640 regarding  
34       applicable requirements, inapplicable requirements, omissions and exclusions.

35       A timely and complete application for the second renewal of the AOP was submitted and  
36       accepted by the agencies in August 2011, therefore the application shield was granted and the  
37       Hanford Site can continue operations under the existing AOP until the new permit is issued and  
38       approved pursuant to WAC 173-401-710.

39       A source seeking a determination of non-applicability for new source review (NSR)  
40       requirements to a particular change would need to provide the permit authority with detailed  
41       information regarding that change. The inapplicable requirements are identified in Table 5.1 of  
42       the AOP. Before the permit shield can extend to requirements that are not imposed on the source

1 in the permit, the permit authority must specifically determine, based on information provided by  
2 the source in the permit application, that such other requirements do not apply to the source. A  
3 request to extend the permit shield to requirements deemed inapplicable to the source may be  
4 made either in the original permit application or in an application for a permit modification.

5 Regulations promulgated under statutory authority other than the FCAA [e.g., *Resource*  
6 *Conservation and Recovery Act (RCRA) of 1976* and *Comprehensive Environmental Response,*  
7 *Compensation and Liability Act (CERCLA) of 1980*] are not Title V applicable requirements and  
8 are not included in this AOP, e.g., Subparts AA, BB, and CC of 40 CFR 264 and 265. In  
9 addition, actions taken pursuant to CERCLA, after proper documentation and verification of  
10 removal and remediation activities, are exempt from clean air permitting requirements. There  
11 are two key considerations to satisfy in the transition process: (1) proper public notice and  
12 review, and (2) no lapse from CAA permitting requirements to onset of CERCLA activities.

13 The following process delineates the steps to remove AOP permitting conditions/certifications  
14 for facilities or activities under CERCLA transition:

- 15 • Permittee will prepare Engineering Evaluation/Cost Analysis (EE/CA) or equivalent  
16 CERCLA documentation for a facility (or activity) identified for CERCLA transition.  
17 This document shall be reviewed by regulators, stakeholders, and the public.
- 18 • This document will clearly identify general CAA requirements to be transitioned to  
19 CERCLA. Consistent with the WAC 173-401-800 requirement, the public review period  
20 shall be a minimum of 30 days with proper notification on the AOP Permit Register and  
21 local newspaper. The notice on the AOP permit register will state that the facility's air  
22 permits will be discontinued upon onset of remediation activity in the field.
- 23 • After the EE/CA or equivalent is approved, permittee will prepare a Risk Assessment  
24 Work Plan (RAWP) or equivalent Applicable or Relevant and Appropriate Requirements  
25 (ARAR) implementation document, such as an Air Monitoring Plan (AMP) to identify  
26 method to meet the substantive portions of existing air permit conditions, and describe  
27 the transition plan for CERCLA air monitoring. EPA, Ecology, and Health will review  
28 the ARAR implementation document, as directed by the lead agency.
- 29 • Concurrently, permittee will submit to Ecology, Health and/or EPA a Notice of  
30 Transition (NOT) (from CAA to CERCLA) for review and approval. The NOT shall  
31 reference the CERCLA authority documentation, identify any/all documentation of  
32 agency air approvals (EPA/Health/Ecology) in place prior to and after CERCLA  
33 transition.
- 34 • Ecology/Health/EPA will review the NOT. If the NOT is contested by an agency, an  
35 issue resolution process will be initiated between the lead agency and the lead regulatory  
36 agency. For actions not contested, the effective date (not the approval date) will coincide  
37 with the onset of the CERCLA remediation activity in the field. The facility's air permits  
38 can be discontinued after the effective date of the NOT.
- 39 • Via formal correspondence, permittee will notify affected agencies of date to begin  
40 remediation activity. It is important to notify Ecology and/or Health that physical  
41 fieldwork of the CERCLA action has commenced. Upon receiving the notice of  
42 fieldwork commencement, Ecology will then notify the public that the previously  
43 applicable permits, licenses, NOC and AOP requirements have now been supplanted by

1 the ARAR implementation document (e.g., RAWP and AMP). Permittee is no longer  
2 required to certify to AOP requirements after the onset of the actual D&D activity.

- 3 • Ecology and Health will delete the affected licenses/NOCs from the enforceable list, and  
4 remove permitting conditions from the AOP as an administrative modification at the next  
5 significant modification.
- 6 • The CAA transition to CERCLA process is deemed complete at this point.

7 **Subsection 4.1.1** of the AOP describes how compliance with the terms and conditions of the  
8 AOP is deemed compliant with the applicable requirements on which that condition is based as  
9 the date of the AOP issuance.

10 **Subsection 4.1.2** of the AOP describes how WAC 173-401-530 establishes several criteria for  
11 determining if an emission unit is insignificant. Section 1.1 of the Statement of Basis for  
12 Attachment 1 contains a list of IEUs from the AOP renewal application (DOE/RL-2011-27,  
13 Section 2.4). WAC 173-401 defines how lists should be maintained during the application phase  
14 and following permit issuance. The applicant is required to amend their application if an IEU,  
15 based on actual emissions, subsequently will exceed an actual emission threshold, and the IEU  
16 must be listed in the AOP. This requirement extends until the draft permit is issued. The AOP  
17 regulations do not require that each IEU be listed in the AOP. Following AOP issuance, no  
18 emission unit that qualifies as an IEU based on actual emissions can exceed the emission  
19 thresholds in WAC 173-401 without first obtaining a permit modification.

20 Attachment 1 of AOP, Table 1.6, “Emission Limits and Periodic Monitoring Requirements for  
21 Emission Units with NOC Approval Conditions,” includes only the emission limits and  
22 conditions identified in the “Approval Conditions” section of the regulatory orders. Information  
23 included in other sections of the orders, such as “Findings,” “Background,” “Description,” or  
24 similarly titled sections are not included in Table 1.6. Table 1.6 is intended to capture the  
25 periodic monitoring, emission limit, and other approval conditions for all emission units with  
26 NOC approval orders. However, Table 1.6 does not list all conditions included in the approval  
27 order as “Approval Conditions.” Most of the excluded conditions have been captured elsewhere  
28 in the AOP as applicable requirements. The categories of excluded approval conditions include  
29 the following:

- 30 • Conditions and requirements addressed in Section 3.0, Standard Terms and Conditions,  
31 of the Hanford Site AOP;
- 32 • Conditions and requirements addressed in Section 4.0, General Requirements, of the  
33 Hanford Site AOP, such as the condition to send reports to the Ecology office or the  
34 requirement to allow access to the facility for inspection;
- 35 • Conditions and requirements that re-state portions of applicable codified regulations;
- 36 • The requirement to prepare and maintain an Operation and Maintenance Manual.

37 **Subsection 4.10** of the AOP describes the conditions for a permit modification. The AOP  
38 modification process and permit change determination key is documented in Appendix B of this  
39 Basis.

40 **Subsection 4.11** of the AOP describes the condition for AOP continuation in case that the  
41 renewed AOP has not been issued on or before the expiration date. All terms and conditions of  
42 the existing AOP, including any permit shield provided under WAC 173-401-640, shall not

1 expire until renewal permit has been issued if a timely and complete application has been  
2 submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in  
3 effect until the renewal permit has been issued if a timely and complete application has been  
4 submitted.

## 5 **5.0 PERMIT ADMINISTRATION**

6 General conditions (including monitoring, compliance inspection, recordkeeping, and reporting  
7 requirements) are applicable to all emission units in the Hanford Site AOP.

8 **Subsection 5.4** of the AOP ensures that the records to demonstrate compliance are available  
9 within a reasonable time. Reasonable time for most records that are kept at an emission unit  
10 should be available with 24 to 48 hours, while records maintained at central repository at the  
11 Hanford Site or within a contractor's record management system should be made available upon  
12 a written request from the agency with a deadline listed based on volume, age and type of record  
13 requested, (electronic versus hard copies).

14 The permittee shall provide requested classified documents to representatives of Ecology, Health  
15 or BCAA who have the appropriate security clearance and a demonstrable need to know. The  
16 records will be processed through the clearance process established by DOE and submitted to the  
17 agency within a reasonable time after they are cleared.

18 **Subsection 5.5** of the AOP describes the requirements for any, form, application, notice, report,  
19 or compliance certification required under chapter 70.94 or 70.120 RCW, or any ordinance,  
20 resolution, regulations, permit, or order in force pursuant thereto. The permittee should not  
21 tamper, make false statements, and ensure truth, accuracy and completeness in every document  
22 submitted to the regulatory agencies that has a regulation applicable under this permit.

23 Approval orders applicable to activities will end at activity completion, as described in the notice  
24 of construction (NOC) application. The permittee is not required to continue to comply with  
25 approval order terms and conditions after these become irrelevant. Examples are initial testing  
26 requirements and completed and closed NOCs and emission units. Appendix A lists Ecology  
27 Completed or closed NOC Approvals, Terms and Conditions or Emission Units. Health  
28 Obsolete NOC Approvals and Obsolete or Closed Emission Units are included in AOP  
29 Attachment 2.

30 **Subsection 5.6** of the AOP describes the semiannual report content and required data to be  
31 submitted every six months. The semiannual report will not include IEUs for Ecology and will  
32 not include Diffuse and Fugitive minor emission units and ALARACTs for Health. The  
33 reporting of Diffuse and Fugitive minor emission units in the annual NESHAPS report will  
34 ensure adequate compliance to the specific terms and conditions and the Standards Terms and  
35 Conditions applicable to emission generation for these types of emission units. In addition to  
36 these diffuse and fugitive emission units, it is understood per agreement with Health that the  
37 "Emission Unit Information" section of emission units listed in the Health License will not be  
38 required to be certified under the annual compliance certification.

39 Health has consolidated the Hanford Site radiological Licenses into a single License (Attachment  
40 2) as such the revision process to the License should be the only requirement to report on for  
41 semiannual reports. As such, each license revision letter number will be listed in the semiannual  
42 reports, along with any notice of construction approvals issued by either Ecology or Health.

1 For all approvals, License activities, and emission units that are closed prior to the reporting  
2 period and considered irrelevant and the applicable AOP modification is submitted to the agency  
3 under Section 4.15 the permittee is not required to report.

4 **Subsection 5.8** of the AOP stipulates that the permittee is not required to conduct monitoring  
5 and associated recordkeeping for emission units that do not operate continuously and are  
6 temporarily or permanently shut down. For example, if the monitoring requires continuous  
7 sampling or recording pressure drop daily, such readings would not be required on any full day  
8 in which the emission unit did not operate. The information required to be reported when the  
9 emission unit is not operational is described.

10 For all approvals, license activities, and emission units that are closed and considered irrelevant  
11 and the applicable AOP modification is submitted to the agency under Section 5.15 the permittee  
12 is not required to conduct the monitoring and associated recordkeeping.

13 **Subsection 5.10** of the AOP describes the annual compliance certification content and required  
14 data to be submitted every year for the previous year's operations of the emission units listed in  
15 the AOP. The annual compliance certification will not include IEUs for Ecology and will not  
16 include Diffuse and Fugitive minor emission units for Health. The reporting of Diffuse and  
17 Fugitive minor emission units in the annual NESHAPS report will ensure adequate compliance  
18 to the specific terms and conditions and the Standard Terms and Conditions applicable to  
19 emission generation for these types of emission units. In addition to these diffuse and fugitive  
20 emission units, it is understood per agreement with Health that the "Emission Unit Information"  
21 section of emission units listed in the Health License will not be required to be certified under  
22 the annual compliance certification.

23 For all approvals, License activities, and emission units that are closed and considered prior to  
24 January of the reporting period will not be included in the annual compliance certification.

25 **Subsection 5.15** of the AOP describes actions that the permittee may take when an emission  
26 unit, condition, term, limit or other requirement not related to monitoring or recordkeeping  
27 becomes irrelevant during the term of the AOP.

28 Approval orders/license applicable to activities will end at activity completion, as described in  
29 the NOC applications. The permittee is not required to continue to comply with approval order  
30 terms and conditions after they become irrelevant. For example, many approval orders contain  
31 the requirement to conduct an initial, one time only, startup test. Once that initial startup test  
32 requirement has been satisfactorily completed, that condition is deemed irrelevant, and the  
33 permittee is no longer bound by that particular requirement. An approval or license activity that  
34 is closed pursuant to the agency's regulations is considered irrelevant. In addition, the permittee  
35 may remove the approval order or license activity and associated terms and conditions from the  
36 AOP by submitting a change not requiring a permit revision AOP modification to the applicable  
37 agency and Ecology.

38 **Subsection 5.17** of the AOP describes the actions required for greenhouse gases (GHG). On  
39 October 30, 2009, EPA published a rule for the mandatory reporting of GHG (also referred to as  
40 40 CFR part 98) from large GHG emissions sources. The rule applies to certain facilities,  
41 including those which emit 25,000 MT CO<sub>2</sub>e or more per year in combined emissions from all  
42 applicable sources, including stationary fuel combustion sources. Hanford's potential GHG

1 emissions are approximately 285,768 MT of CO<sub>2</sub>e per year. Therefore, Hanford may be subject  
2 to the Mandatory Greenhouse Gas Reporting rule.

3 Regardless of applicability of the Mandatory Greenhouse Gas Reporting rule to Hanford, Title  
4 40 CFR Part 98, Federal Mandatory Reporting of Greenhouse Gases, is not an AOP applicable  
5 requirement. According to EPA guidance as published in the Federal Register (56288 FR  
6 74:209, Friday, October 30, 2009), the requirements imposed by this rule are not applicable  
7 requirements under the Title V operating permit program. Therefore, requirements of the GHG  
8 rule have not been included in this permit.

9 On December 1, 2010, Ecology promulgated Chapter 173-441 WAC – Reporting of Emissions  
10 of Greenhouse Gases. The WAC incorporates by reference certain, but not all, calculation  
11 methods and other requirements from 40 CFR Part 98, the federal Mandatory Greenhouse Gas  
12 Reporting rule. The WAC applies to any facility that emits 10,000 MT of CO<sub>2</sub>e or more per  
13 calendar year in total GHG emissions, including biogenic CO<sub>2</sub>, from all applicable source  
14 categories listed in WAC 173-441-120.

15 Hanford may be subject to the requirements of chapter 173-441 WAC if actual GHG emissions  
16 are greater than 10,000 MT of CO<sub>2</sub>e per year. Potential GHG emissions at Hanford are 285,768  
17 MT of CO<sub>2</sub>e per year. As owner of the Hanford Site, DOE is required to demonstrate  
18 compliance with all applicable provisions of WAC 173-441.

19 EPA-457/B-11-001, “PSD and Title V Permitting Guidance for Greenhouse Gases” states that  
20 under the Tailoring Rule, “... any applicable requirement for GHGs must be addressed in the  
21 title V permit (i.e., the permit must contain conditions necessary to assure compliance with  
22 applicable requirements for GHGs). It is important to note that GHG reporting requirements for  
23 sources established under EPA’s final rule for mandatory reporting of GHGs (40 CFR Part 98:  
24 Mandatory Greenhouse Gas Reporting, hereafter referred to as the “GHG reporting rule”) are  
25 currently not included in the definition of applicable requirements in 40 CFR 70.2. Although the  
26 requirements contained in the GHG reporting rule currently are not considered applicable  
27 requirements under the Title V regulations, the source is not relieved from the requirement to  
28 comply with the GHG reporting rule separately from compliance with their title V operating  
29 permit. It is the responsibility of each source to determine the applicability of the GHG reporting  
30 rule and to comply with it, as necessary. However, since the requirements of the GHG reporting  
31 rule are not considered applicable requirements under title V, they do not need to be included in  
32 the title V permit.”

33 As the permittee currently has no other federally enforceable requirements related to GHG  
34 emissions (e.g. GHG BACT requirements resulting from PSD review process), Section 5.17  
35 covers state only GHG requirements in WAC 173-441. WAC 173-441 reporting requirements  
36 are in metric tons.

37 **Subsection 5.18** of the AOP describes the obligations of the permitting agencies and the  
38 permittee. The DOE submitted AOP renewal application on June 21, 2011. The application is  
39 deemed complete according to the criteria in WAC 173-401-500. The renewal application was  
40 submitted more than 6 months before the date of AOP expiration on December 31, 2011, and  
41 hence regarded as timely application. The permittee’s rights to operational continuity and permit  
42 shield are described in WAC 173-401-620 and -640.

1 This AOP renewal (renewal 2) will cover the 5 year period from April 1, 2013, to March 31,  
2 2018. The next renewal application will be submitted by DOE no later than 6 months prior to  
3 the AOP expiration date. The permitting authority shall send a permit application to each source  
4 at least six months before a complete application is due. The “complete” renewal application  
5 shall outline the information required for the three agencies (Ecology, Health, and BCAA) to  
6 update their respective permitting conditions.

7 The permitting authority may require that a permit renewal application must be submitted earlier.  
8 The permitting agency must mail this written notice to the source at least one year before the  
9 new application deadline to ensure that the terms of the permit will not lapse before the permit is  
10 renewed.

11 **Subsection 5.27** of the AOP describes why certain regulatory requirements are not applicable to  
12 the Hanford operation. Inapplicable requirements at the time of AOP issuance are shown in  
13 Table 5-1.

## 14 **6.0 STATEMENT OF BASIS**

15 This Statement of Basis (Statement) is issued as a separate supporting reference document to the  
16 AOP. It is non-enforceable, and sets forth the legal and factual basis for permit conditions. This  
17 Statement includes references to the applicable statutory or regulatory provisions, technical  
18 supporting information on specific emission units, and clarifications of specific requirements.

19 [WAC 173-401-700(8)]

## 20 **7.0 ATTACHMENTS**

### 21 **Attachment 1: Ecology Permit**

22 The permittee is authorized to operate the non-radioactive portion of the air emission units  
23 identified in this attachment and all insignificant emission units not specifically identified in this  
24 permit.

### 25 **Attachment 2: Health License**

26 The permittee is authorized to operate the radioactive portion of the air emission units identified  
27 in this attachment.

### 28 **Attachment 3: Benton Clean Air Agency Permit**

29 The permittee is authorized to operate the air emission units identified as open burning and  
30 asbestos-related activities. Because these requirements could be triggered at various places on  
31 the Hanford Site major stationary source, the emission units are not listed individually in the air  
32 operating permit.

33

1 **8.0 APPENDIX A**

2 This Appendix includes emission units that have become obsolete, been completed, or have  
3 closed since the last AOP renewal.

4 (Health Obsolete NOC Approvals or Licenses and Health Obsolete or Closed Emission Units are  
5 included in Attachment 2.)

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**Ecology, Obsolete, Completed or Closed NOC Approvals, Terms and Conditions  
or Emission Units**

EMISSION POINT	PROJECT	PERMIT NO.	CONDITIONS
200 P-296P032-001	Rotary Mode Core Sampling System (RMCS) #2	NOC-93-04	Obsolete NOC
200 P-296P032-001	Rotary Mode Core Sampling System (RMCS) #2	Letter	Obsolete NOC
200 P-296P033-001 & 200 P-296P034-001	Rotary Mode Core Sampling System (RMCS) 3 & 4 and Modification2	NWP95-RMCS(3)	Obsolete NOC
200E C-106 Sluicing	241-C-106 Tank Sluicing, Phase II	97NM-001	(Obsolete) 50 ppm measured as total organic carbon
200E P-296A042-001	241-AZ-101 Tank Waste Retrieval and 241-AY/241-AZ Tank Farms Ventilation Upgrades, Project W-151 and Project W-030	NOC 94-07	Obsolete. VOCs 0.001 lb/hour.
200E P-296C007-001	C-103 Ventilation Upgrades	NWP 95-TK C-103	Obsolete NOC
200E P-296C007-001	C-103 Ventilation Upgrades, Approval for Alternate Sampling and Analysis method.	NWP 95-TK C-103 Modification	Obsolete NOC
200 P-296P034-001	Rotary Mode Core Sampling System (RMCS) 3 & 4 and Modification2	NWP95-RMCS(3)	Obsolete NOC
200E P-296P041-001	241-A-101 Tank Portable Exhauster		Obsolete NOC
200W P-291Z001-001	PFP Polycubes	DE01NWP-001	Obsolete NOC
200W P-296P028 001	Backup Exhauster for 200W P-296SY 001	Discharge point	Removed from AOP because the unit is non-operational.
200W P-296SX 001	SX Farm (Exhauster)	Discharge point	Removed because the discharge point is inactive.
200 P-296P033-001 & 200 P-296P034-001	Rotary Mode Core Sampling System (RMCS) 3 & 4 and Modification2	DE98NWP-005	Closed NOC
200W P-296S021 001	222-S Hot Cell Expansion	Letter	Removed from AOP because actions have been completed.
W-PORTEX 020, 024, and 025	Portable Exhausters	DE98NWP-006	Closed NOC

### Ecology, Obsolete, Completed or Closed NOC Approvals, Terms and Conditions or Emission Units

EMISSION POINT	PROJECT	PERMIT NO.	CONDITIONS
200E P-244CR 001 (CR Vault)	Exhauster	Discharge Point	Removed from AOP because facility exhauster has been isolated and is inactive.
100 J-NONPOINT 006	100-N Emergency Dump Basin	NWP 95-1300N EDB	Obsolete NOC
100K Cold Vac. Drying	Cold Vacuum Drying - Phase I	96NM-091	Obsolete NOC
100N S-RCF-EX 001	Environmental Analytical Lab (EAL)	NWP 95(8)-100N/EAL	Obsolete NOC
200E Hot Condt. Annex	Hot Conditioning Annex	96NM-092	Obsolete NOC
200E P-2025E ETF	Effluent Treatment Facility (ETF) (2025 E), Approval of NOC Application for Nonradioactive Air Emissions	NOC-93-3	Obsolete. VOCs now regulated under RCRA Subpart AA).
200E P-2025E ETF	Effluent Treatment Facility (ETF) (2025 E), Approval of NOC Application for Nonradioactive Air Emissions	NOC-93-3	Obsolete
200E P-2025E ETF	Effluent Treatment Facility (ETF) (2025 E), Approval of NOC Application for Nonradioactive Air Emissions	NOC-93-3	Obsolete
200E P-2025E ETF	Effluent Treatment Facility (ETF) (2025 E), Approval of NOC Application for Nonradioactive Air Emissions	NOC-93-3	Obsolete. This final approval became void because construction or operation of these units was discontinued for eighteen (18) consecutive months.
200W F-284WB 001	Backup Package Boiler	NOC-94-06	Obsolete NOC
200W F-284WB 001	Backup Package Boiler	NOC-94-06A	Obsolete NOC
200W P-WRAP1 001	Waste Receiving and Processing (WRAP Facility)	NOC 93-05	Obsolete
200W P-WRAP1 001	Waste Receiving and Processing (WRAP Facility)	NOC 93-05	Obsolete
200W P-WRAP1 001	Waste Receiving and Processing (WRAP Facility)	NOC 93-05	Obsolete. Opacity 5 %
200W P-WRAP1 001	Waste Receiving and Processing (WRAP Facility)	NOC 93-05, Revision Approval	Obsolete, RL shall notify Ecology at least 14 days prior to initial processing of retrieved waste at WRAP
300 300 Area Fuel Supply	300 Area Fuel Supply Shutdown Facilities, Building 303F and 334A	DE 98NWP-001	Obsolete NOC.

<b>Ecology, Obsolete, Completed or Closed NOC Approvals, Terms and Conditions or Emission Units</b>			
<b>EMISSION POINT</b>	<b>PROJECT</b>	<b>PERMIT NO.</b>	<b>CONDITIONS</b>
300 EP-3020-02-S through -06-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	Obsolete 1-5-1999/complete. The emission limits for ammonia and VOC are 0.01 and 0.24 pound per hour, respectively, from the sum of the five chemical stacks.
300 EP-3020-07-S through -11-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	Obsolete 6-9-2000.
300 EP-3020-01-S through -12-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	Obsolete 6-9-2000. Operating and maintenance manuals for all equipment that has the potential to affect emissions to the atmosphere have been developed and followed. Copies of the manuals are available to Ecology.
300 EP-3020-02-S through -06-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	Complete. Energy shall submit normal emissions and revised maximum emissions for all TAP released from each of five chemical stacks to Ecology within 15 months after the EMSL starting operation.
300 EP-3020-01-S through -12-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	Complete.
300 EP-3020-01-S through -12-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08 (Effective: 9-13-1994)	Obsolete 6-9-2000. Environmental Molecular Sciences Laboratory (EMSL) research projects, supporting operations, and building equipment additions and changes including control systems, can be made to accommodate changing research and support requirements. These changes can be made without filing a Notice of Construction.
300 EP-306W-03-V	Operation of Material Development Laboratory and Catalytic Electrochemical Oxidation Unit (CEO)	DE 98NWP-002	Obsolete NOC.
300 EP-324-01-S	324 Building Modification	NWP 95-300/324 Lab	Obsolete NOC.

**Ecology, Obsolete, Completed or Closed NOC Approvals, Terms and Conditions or Emission Units**

EMISSION POINT	PROJECT	PERMIT NO.	CONDITIONS
300 EP-324-01-S	Operation of a Plasma Arc Furnace in the 324 Building	NWP-96-2	Obsolete NOC.
300 EP-325-01-S	325 Hazardous Waste Treatment Unit (HWTU)	DE 98NWP-004	Condition completed 10/17/01. General Testing Requirements: Perform initial source test for Volatile Organic Compounds (VOCs). DOE-RL shall demonstrate initial compliance for Volatile Organic Compounds (VOC) through source tests conducted no later than

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Ecology Completed or Closed NOC Approvals, Terms and Conditions or Emission Units			
EMISSION POINT	PROJECT	PERMIT NO.	CONDITIONS
			180 days after start-up of the proposed HWTU/SAL activities. EPA Reference Method 25A shall be followed for testing, the test plan shall be submitted to Ecology upon request. After source tests are completed, mass balance calculations will be accepted for compliance purposes.
300 EP-3020-01-S through -12-S	Environmental Molecular Sciences Lab (EMSL)	NOC 94-08	Obsolete 9-10-2003. Replaced by DE03NWP-003.
300 Area 336 Building Diesel Engines	Two diesel engines supporting 336 High Bay Testing Facility	DE06NWP-002	NOC closure on 10/22/2008 due to facility demolition.
Fossil Fuel Fired Steam Generating Units	ESPC Boilers	97NM-138	Initial source testing was partially completed. First 5 year retesting completed in August, 2003.
Waste Treatment and Immobilization Plant Blasting and Painting Booths	Blasting and Painting Booths	DE08NWP-002	NOC obsolete 8/3/10 due to failure to construct.
Effluent Treatment Facility – Solidification Treatment Unit (STU)	Solidification of brine with cementitious materials and silage.	DE07NWP-003	Obsolete STU conditions 8/10/10 due to failure to construct.
200 Area Diffuse and Fugitive Emissions	Boiler operations for tank waste retrieval	DE00NWP-001	Obsolete two boilers due to failure to construct. Obsolete some TAPs due to regulation change. 8/18/10.
329 Chemical Science Laboratory	Laboratory hood operations	NWP95-329/300A	NOC closure on 12/17/10 due to project discontinuation.
331-C Gas Cylinder Management Process	Hood venting of pressurized gas cylinders	DE98NWP-003 and Amendment 1	NOC closure on 12/17/10 due to project discontinuation.
EP-331-01-V Life Sciences Laboratory I	Life Sciences Laboratory	97NM-147	NOC voided at DOE request with an effective date of September 30, 2011, because the facility qualifies for an exemption under WAC 173-400-100(4)(f)(iv)
300 E-1000 001	Emergency backup diesel generator		Removal of boiler from AOP as a result of permanent shutdown

1 **9.0 APPENDIX B**

2 **B-1 AOP Modification Process**

3 Determine the type of modification desired, select the correct form below, and follow the  
4 processes described for each type of modification or revision to the Hanford Site AOP. These  
5 forms and process are not to be used for any type of NOC approval or License revisions  
6 submitted to the agencies.

7 These decision flow charts have been revised at the time of renewal to provide a streamlined  
8 reflection of the codified requirements for administrative changes to WAC 173-401 major  
9 stationary sources. Forms, decision points, and processes described herein, including  
10 appropriate verbatim language from the regulation, are intended to supersede all previous  
11 internal DOE/Contractor guidance for processing AOP modifications at the Hanford Site.

12 Each of WAC 173-401 permit modifications and revisions have been listed in a format that  
13 provides the requirements, then a method to be used to determine if a modification or revision  
14 should or should not be used, followed by the form that should be completed, and the  
15 responsibilities of the permittee and the agency. It should be noted that individual emission units  
16 (for either toxic or radiological emissions) have their own individual modification and revision  
17 process. These unit specific modifications and revisions are expected to be integrated into the  
18 AOP when the AOP is revised.

19

## 1 **B-2 Administrative Permit Amendment (AA) (WAC 173-401-720)**

2 This change is allowed pursuant to WAC 173-401-720(1) and WAC 173-401-720(2):

3 1) Definition. An “administrative permit amendment” is a permit revision that:

4 (a) Corrects typographical errors,

5 (b) Identifies a change in the name, address, or phone number of any person identified in the permit, or  
6 provides a similar minor administrative change at the source,

7 (c) Requires more frequent monitoring or reporting by the permittee,

8 (d) Allows for a change in ownership or operational control of a source where the permitting authority  
9 determines that no other change is necessary, provided that a written agreement containing the specific  
10 information of the transfer between the current and new permittee has been submitted to the permitting  
11 authority,

12 (e) Incorporates into the chapter 401 permit the terms, conditions, and provisions from orders approving  
13 notice of construction applications processed under an EPA-approved program; provided that such a  
14 program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-  
15 700, 173-401-725, and 173-402-800 that would be applicable to the change if it were subject to review as  
16 a permit modification, and compliance requirements substantially equivalent to those contained in WAC  
17 173-401-600 through 173-401-650.

18 2) Acid Rain provisions. [This requirement is not applicable to the Hanford Site per Table 5-1 of the  
19 AOP.]

### 20 Method

21 [Note: It is possible an AA may be used for something not listed below, check with the site contractor responsible for the AOP.]

22 Using the requirements listed above in the box, an AA for the Hanford Site AOP would be  
23 developed and submitted for any of the following:

- 24 • Correct typographical errors to any section, requirement, term, definition, conditions,  
25 standard, abatement, monitoring, statement of basis, etc.
- 26 • Change of DOE personnel/POCs, contractors, name of business, agency POCs, etc.
- 27 • Change increases the frequency of monitoring and/or reporting for an emission unit. This  
28 increase could be a change to a program or a particular emission unit procedure, etc.
- 29 • Change of ownership and operation of emission units currently listed in the AOP under  
30 the applicable DOE Offices: Richland, Office of River Protection, and Office of Science.
- 31 • If a NOC approval and/or Licenses is processed through public review (EPA-approved)  
32 that meets substantially procedural and compliance requirements of cited requirements in  
33 WAC 173-401-720(1)(e) as part of the agency approving process for the document, then  
34 the conditions and limitations for operating the emission unit may be incorporated into  
35 the AOP by an AA.

36 The AA is not used for making changes to the AOP statement of basis, NOC approvals or  
37 Licenses listed in the AOP, notifying the agency of changes to applicable requirements,  
38 decreasing the frequency of monitoring and/or reporting, change in contractor under DOE  
39 contracts, adding new NOC approvals or Licenses requirements that are not approved per  
40 procedural and compliance requirements.

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43

1 Combining emission units under a single AA should be considered only if the change is the same  
2 for multiple emission units, i.e., abatement technology is misspelled for more than one unit, or a  
3 condition and limitation listed for a project has a typographical error and is listed for multiple  
4 emission units. Otherwise it is preferred that separate forms are used for each identified  
5 error/change per emission unit.

6 ***If this modification is not what is required to change the Hanford Site AOP, please review the***  
7 ***following other types of modifications and revisions.***

#### 8 Responsibilities

#### 9 Hanford Site Actions

- 10 1. Develop the AA by emission unit by using the form following this section.
- 11 2. Seek consensus with the site contractor for the AOP prior to submittal of the request.
- 12 3. Submit an AA to the AOP via a letter to DOE and request DOE to submit the AA to the  
13 agencies.
- 14 4. On the submittal request, copy organizations that retain a copy of the AOP or request the  
15 lead agency to notify AOP holders per WAC 173-401-720(3)(a).
- 16 5. Permittee can make change immediately to the AOP on submittal of the request to  
17 Ecology and WDOH. [WAC 173-401-720(3)(c)]
- 18 6. Although not required by regulation, the permittee should retain a copy of the AA either  
19 in a record file or attach to the AOP for tracking incorporation into the AOP by the next  
20 modification.

#### 21 Agency Actions

- 22 1. Permitting authority (Ecology) shall take no more than 60 days from receipt of a request  
23 for an AA to take final action on such request, and may incorporate such changes without  
24 providing notice to the public or affected states provided that it designates any such AOP  
25 revisions as having been made pursuant to this paragraph [WAC 173-401-720(3)(a)]
- 26 2. Ecology will submit a copy of the revised AOP to the Administrator (EPA).
- 27 3. Ecology shall upon taking final action granting a request for an AA, allow coverage by  
28 the permit shield in WAC 173-401-640 for AAs made pursuant to subsection WAC 173-  
29 401-720(1)(e).
- 30 4. Notify other permit holders with copies of the AA.

31

1 **HANFORD SITE AIR OPERATING PERMIT**

2 **Notification of Administrative Permit Amendment**

3 This notification is provided to the Washington State Department of Ecology, Washington State  
4 Department of Health, and the U.S. Environmental Protection Agency as notice of an  
5 administrative permit amendment described as follows.

6 This change is allowed pursuant to WAC 173-401-720(1) and WAC 173-401-720(2):

- 7 1. Corrects typographical errors,
- 8 2. Identifies a change in the name, address, or phone number of any person identified in the permit, or  
9 provides a similar minor administrative change at the source,
- 10 3. Requires more frequent monitoring or reporting by the permittee,
- 11 4. Allows for a change in ownership or operational control of a source where the permitting authority  
12 determines that no other change is necessary, provided that a written agreement containing the specific  
13 information of the transfer between the current and new permittee has been submitted to the permitting  
14 authority,
- 15 5. Incorporates into the chapter 401 permit the terms, conditions, and provisions from orders approving  
16 notice of construction applications processed under an EPA-approved program; provided that the program  
17 meets procedural requirements listed in WAC 173-401, and
- 18 6. Changes addressed in the administrative permit amendment can be implemented immediately upon  
19 submittal.

20 Permit Number: 00-05-006

21 Provide the following information pursuant to WAC-173-401-720:

<b>Description of the change:</b>
<b>Submittal Date of Change:</b>
<b>Describe the emissions from orders approving notice of construction applications processed under an EPA-approved program; provided that the program meets procedural requirements listed in WAC 173-401:</b>
<b>List the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program; provided that the program meets procedural requirements listed in WAC 173-401:</b>

22  
23

1 **B-3 Changes Not Requiring a Permit Revision (CNRR) (WAC 173-401-722)**

2 This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-  
3 722(5):

4 1) General

5 (a) A chapter 401 source is authorized to make the changes described in this section without a permit  
6 revision, providing the following sections are met:

7 (i) The proposed changes are not a Title I modifications;

8 (ii) The proposed changes do not result in emissions which exceed those allowable under the permit,  
9 whether expressed as a rate of emissions, or in total emissions;

10 (iii) The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions  
11 from units covered by the permit; and

12 (iv) The facility provides the administrator and permitting authority with written notifications at least  
13 seven days prior to making the proposed changes except that written notification of a change made in  
14 response to an emergency shall be provided as soon as possible after the event.

15 (b) Permit attachments. The source and permitting authority shall attach each notice to their copy of the  
16 relevant permit.

17 (2) Section 502(b)(10) changes. Pursuant to the conditions in subsection (1) of this section, a chapter 401  
18 source is authorized to make section 502(b)(10) changes (as defined in WAC 173-501-200) without a  
19 permit revision.

20 (a) For each such change, the written notification required under subsection (1)(a)(iv) of this section shall  
21 include a brief description of the change within the permitted facility, the date on which the change will  
22 occur, any change in emissions, and any permit term or conditions that is no longer applicable as a result  
23 of the change.

24 (b) The permit shield authorized under WAC 173-401-640 shall not apply to any change made pursuant to  
25 this paragraph.

26 (3) SIP authorized emission trading. [This requirement is not applicable to the Hanford Site per Table 5-1  
27 of the AOP.]

28 (4) Emissions cap. [This requirement is not applicable to the Hanford Site per Table 5-1 of the AOP.]

29 (5) A source making a change under this section shall comply with applicable preconstruction review  
30 requirements established pursuant to RCW 70.94.152.

31  
32 **Method**

33 [Note: It is possible a CNRR may be used for something not listed below, check with the site contractor responsible for the  
34 AOP.]

35  
36 Using the requirements listed above in the box, a CNRR for the Hanford Site AOP would be  
37 developed and submitted for any of the following:

- 38 • Changes that decrease emission rates or total emission for an emission unit or Hanford  
39 Site,
- 40 • Changes that remove irrelevant terms and conditions
- 41 • Changes that remove terms and conditions of either a closed emission unit or NOC  
42 approval or License section,
- 43 • Changes to abatement technology which do not impact the enforcement limitation of the  
44 permit to control emissions, such as but not limited to, adding new abatement, changing  
45 the required number of units, as long as the new condition is more stringent; clarifying

1 additional descriptions, as long as the change does not change the actual field  
2 configuration and the change has no direct impact on emission; etc.

- 3 • A change under 502(b)(10) allows for any change that does not violate permit terms and  
4 conditions, therefore a change to conditions and limitations such as but not limited to:  
5 description, operations that are not associated with emission generation, flow rate,  
6 temperature, dimensions, equipment, etc, are acceptable under 502(b)(10).
- 7 • Changes to monitoring and sampling for individual emission units as long as the Hanford  
8 monitoring and sampling program is not changed and the change follows the site  
9 programs, i.e., a 4 week per year sampling is changed to a one 4 week sample per year  
10 condition. The method and equipment is not changed and compliance is still enforced.
- 11 • Adding changes to the WDOH License as long as the changes do not impact emission  
12 rates, or monitoring, recordkeeping, and other requirements, as listed above, this would  
13 include removing terms and conditions that have been approved via the license revision,  
14 NOC approval process or closure process and the changes do not require public  
15 comment.

16 The proposed CNRR changes are not for Title I modifications [Standards of Performance for  
17 New Stationary Sources or Hazardous Air Pollutants, see WAC 173-401-200(35) for complete  
18 definition]. (WAC 173-401-722)

19 Combining emission units under a single CNRR should be considered only if the change is the  
20 same for multiple emission units, i.e., abatement technology needs to be changed for more than  
21 one unit, or a new approval is applicable or a condition and limitation listed for a project is  
22 irrelevant and is listed for multiple emission units. Otherwise it is preferred that separate forms  
23 are used for each identified change per emission unit.

24 A CNRR requires a seven day notification prior to implementing or making a change to the  
25 AOP, and the CNRR must be attached to the AOP following the effective date of the change.  
26 Any change made through the CNRR process is not covered by the AOP permit shield, therefore  
27 there is risk associated with the change to be challenged and new applicable requirements being  
28 amended to the AOP by a CNRR.

29 *If this revision is not what is required to change the Hanford Site AOP, please review the following*  
30 *other types of modifications and revisions.*

### 31 Responsibilities

#### 32 Hanford Site Actions

- 33 1. Develop the CNRR by emission unit by using the form following this section. The form,  
34 if filled out correctly and completely shall furnish the information required of a CNRR  
35 notification.
- 36 2. Seek consensus with the site contractor for the AOP prior to submittal of the request.
- 37 3. Submit a CNRR to the AOP via a letter to DOE and request DOE to submit the CNRR to  
38 the agencies.
- 39 4. On the submittal request, copy organizations that retain a copy of the AOP or request the  
40 lead agency to notify AOP holders.
- 41 5. Permittee can make change to the AOP seven days following submittal of the request to  
42 administrator (EPA) and permitting authority (Ecology). [WAC 173-401-722(1)(a)(iv)]

- 1        6. Attach each notice to the record copy of the relevant AOP.
- 2        7. Comply with applicable preconstruction review requirements for any CNRR.

3    Agency Actions

- 4        1. Review and concur (or deny) proposed changes prior to the implementation date, which
- 5            is a minimum of seven days from the date of submittal. Ecology has agreed to a three (3)
- 6            working day approval of this type of AOP revision/modification.
- 7        2. Ecology will attach each notice to its copy of the relevant AOP
- 8        3. Notify other permit holders with copies of the CNRR.

9  
10

DRAFT

1 **HANFORD SITE AIR OPERATING PERMIT**  
2 **Notification of Changes Not Requiring Permit Revision**  
3 **Section 502(b)(10) Change\***

4 This notification is provided to the Washington State Department of Ecology, Washington State  
5 Department of Health, and the U.S. Environmental Protection Agency as notice of a change not  
6 requiring permit revision described as follows.

7 This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-  
8 722(5):

- 9 1. Change is not a Title I modification;
- 10 2. Change does not result in emissions that exceed those allowable under the permit, whether expressed
- 11 as a rate of emissions, or in total emissions;
- 12 3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units
- 13 covered by the permit;
- 14 4. Notification is provided to Ecology, WDOH, and EPA at least 7 days before making the change, and
- 15 5. Change does not violate applicable requirements or contravene enforceable permit terms and
- 16 conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance
- 17 certification requirements.
- 18 6. A source making a change under this section shall comply with applicable preconstruction review
- 19 requirements established pursuant to RCW 70.94.152.

20 Permit Number: 00-05-006

21 Provide the following information pursuant to WAC-173-401-722(2)(a):

<b>Description of the change:</b>
<b>Date of Change:</b>
<b>Describe the emissions resulting from the change:</b>
<b>List any permit term or condition that is no longer applicable as a result of the change:</b>

22

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\* WAC 173-401-200(30) states that "Section 502 (b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**B-4 Off-Permit Change (OPC) (WAC 173-401-724)**

This change is allowed pursuant to WAC 173-401-724(1), WAC 173-401-724(2), and WAC 173-401-724(6):

- (1) The source shall be allowed to make changes not specifically addressed or prohibited by the permit terms and conditions, without requiring a permit revision provided that the proposed changes do not weaken the enforceability of the existing permit conditions. Any change that is a Title I modification or is a change subject to the acid rain requirements under Title IV of the FCAA must be submitted as a permit revision.
- (2) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- (4) The change shall not qualify for the permit shield under WAC 173-401-640.
- (6) A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

**Method**

[Note: It is possible an OPC may be used for something not listed below, check with the site contractor responsible for the AOP.]

Using the requirements listed above in the box, an OPC for the Hanford Site AOP would be developed and submitted for any of the following:

- Changes that are similar to the type of emission units and terms and conditions listed in the AOP.
- Add new emission units and approvals/license requirements issued by the agencies. Most agency issued NOC approvals/Licenses are considered OPC.

The OPC is not used for changes that are specifically prohibited by the AOP and weaken the enforceability of existing terms, or Title I modification or is a change subject to acid rain requirements under Title V of the FCAA.

Combining emission units under a single OPC should be considered only if the change is the same for multiple emission units, i.e., abatement technology needs to be changed for more than one unit, or a new approval is applicable or need to be listed for multiple emission units. Otherwise it is preferred that separate forms are used for each identified error/change per emission unit.

The source shall be allowed to makes changes not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed changes do not weaken the enforceability of the existing permit conditions. Any change made through the OPC process is not covered by the AOP permit shield, therefore there is risk associated with the change to be challenged and new applicable requirements being amended to the AOP by an OPC.

***If this revision is not what is required to change the Hanford Site AOP, please review the following other types of modifications and revisions.***

1 Responsibilities

2 Hanford Site Actions

- 3 1. Develop the OPC by emission unit by using the form following this section. The form, if  
4 filled out correctly and completely shall furnish the information required of an OPC  
5 notification. In addition, a NOC/License revision or new source permit application can  
6 be used or attached to the OPC as a mechanism to complete the form.
- 7 2. Seek consensus with the site contractor for the AOP prior to submittal of the request.
- 8 3. Submit an OPC to the AOP via a letter to DOE and request DOE to submit the OPC to  
9 the agencies.
- 10 4. On the submittal request, copy organizations that retain a copy of the AOP or request the  
11 lead agency to notify AOP holders.
- 12 5. Permittee can make the change to the AOP following submittal of the request to  
13 administrator (EPA) and permitting authority (Ecology). [WAC 173-401-724(1)]
- 14 6. Keep records describing changes made at the source that result in emissions of a  
15 regulated air pollutant subject to an applicable requirement, but not otherwise regulated  
16 under the AOP, and the emissions resulting from those changes.
- 17 7. Comply with applicable preconstruction review requirements for any OPC.
- 18 8. Although the permittee can make change immediately upon submittal of the request to  
19 Ecology and EPA, and, as appropriate, WDOH, final changes are to be implemented after  
20 agency review/concurrence

21 Agency actions

- 22 1. Review and concur (or deny) proposed changes upon receipt of submittal. Ecology has  
23 agreed to a three working day approval of this type of AOP revision/modification.
- 24 2. Notify other permit holders with copies of the OPC.
- 25 3. Changes will be incorporated into the AOP at the next AOP revision/modification subject  
26 to public review.
- 27

1 **Notification of Off-Permit Change**

2 Permit Number: 00-05-006

3 This notification is provided to Washington State Department of Ecology, Washington State  
4 Department of Health, and the U.S. Environmental Protection Agency as a notice of an off-  
5 permit change described as follows.

6 This change is allowed pursuant to WAC 173-401-724(1), WAC 173-401-724(2), and WAC 173-401-  
7 724(6):

- 8 1. Change is not specifically addressed or prohibited by the permit terms and conditions;
- 9 2. Change does not weaken the enforceability of the existing permit conditions;
- 10 3. Change is not a Title I modification or a change subject to the acid rain requirements under Title IV of  
11 the FCAA;
- 12 4. Change meets all applicable requirements and does not violate an existing permit term or condition;
- 13 5. Change has complied with applicable preconstruction review requirements established pursuant to  
14 RCW 70.94.152.

15 Provide the following information pursuant to WAC-173-401-724(3):

<b>Description of the change:</b>
<b>Date of Change:</b> (To be provided in the agency approval order.)
<b>Describe the emissions resulting from the change:</b>
<b>Describe the new applicable requirements that will apply as a result of the change:</b> (To be provided in the agency approval order.)

16

17

**1 B-5 Minor Permit Modification (MM) (WAC 173-401-725(2))**

2 Minor permit modifications are allowed under WAC 173-401-725(2):

3 (1) Definition. A permit modification is any revision to a chapter 401 permit that cannot be accomplished  
4 under provisions for administrative permit amendments under WAC 173-401-720.

5 (2) Minor permit modification procedures.

6 (a) Criteria.

7 (i) Minor permit modification procedures shall be used for those permit modifications that:

8 (A) Do not violate any applicable requirement;

9 (B) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements  
10 in the permit;

11 (C) Do not require or change a case-by-case determination of an emission limitation or other standard, or  
12 a source-specific determination for temporary sources of ambient impacts, or a visibility or increment  
13 analysis;

14 (D) Do not seek to establish or change a permit term or condition for which there is no corresponding  
15 underlying applicable requirement and that the source has assumed to avoid an applicable requirement to  
16 which the source would otherwise be subject. Such terms and conditions include:

17 (I) A federally enforceable emission cap assumed to avoid classification as a modification under any  
18 provision of Title I of the FCAA; and; [This requirement is not applicable to the Hanford Site per Table  
19 5-1 of the AOP.]

20 (II) An alternative emission limit approved pursuant to regulations promulgated under Section 122(i)(5)  
21 of the FCAA; . [This requirement is not applicable to the Hanford Site per Table 5-1 of the AOP.]

22 (E) Are not modifications under any provision of Title I of the FCAA;

23 (ii) Notwithstanding (a)(i) of this subsection, and subsection (3)(a) of this section, the permitting authority  
24 may allow the use of the minor modification procedures for permit modifications involving the use of  
25 economic incentives, marketable permits, emission trading, and other similar approaches, to the extent  
26 that the use of such minor permit modifications procedures are explicitly provided for in the Washington  
27 state implementation plan or in applicable requirements promulgated by EPA and in effect on April 7,  
28 1993. [This requirement is not applicable to the Hanford Site per Table 5-1 of the AOP.]

**29 Method**

30 [Note: It is possible a MM may be used for something not listed below, check with the site contractor responsible for the AOP.]  
31

32 Using the requirements listed above in the box, a MM for the Hanford Site AOP would be  
33 developed and submitted for any of the following:

- 34 • Any modification that could not be processed as an AA. This does not address revisions  
35 that could be processed as a CNRR or OPC.
- 36 • Changes that do not violate any of the applicable requirements of the current AOP, such  
37 as but not limited to regulations identified as being applicable, NOC approvals listed in  
38 the AOP and associated terms and conditions, WDOH licenses and associated terms and  
39 conditions,
- 40 • Any change that is not significant to existing monitoring, reporting or recordkeeping,  
41 defined as but not limited to: changing a sampling requirement (including method and  
42 analysis), changing reporting of emissions, test data, etc. that does not change the  
43 Hanford program, but provides clarification and standardization of such reporting for all  
44 emissions listed in the AOP, changes recordkeeping in which the compliance  
45 determination method listed in the annual certification is a system or program and the

1 change does not affect the overall system or program but provides clarification and  
2 standardization of the requirements to all emission units listed in the AOP.

- 3 • Add new emission units and approvals/license requirements issued by the agencies.

4 The MM is not used for Title I modifications of the FCAA, a revision to the permit that should  
5 be addressed under a CNRR or OPC, a significant modification (a significant change in existing  
6 monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit  
7 terms or conditions), best way to define a MM is examples such as:

- 8 • Sluicing process change for C-106 in December 2002. The activity modification resulted  
9 in a new NOC (DOE application 02-ED-038) with no change in radioactive releases.
- 10 • Minor design change for the Hanford Tank Waste Treatment and Immobilization Plant.  
11 The design change resulted in Amendment 1 of NOC DE02NWP-002 on November 24,  
12 2003. The resulting changes in non-radioactive emissions were not significant.

13 A MM change can be made following submittal of the request to administrator (EPA) and  
14 permitting authority (Ecology). If the MM is associated with a NOC approval or application for  
15 a new emission unit, then the permittee must ensure that the NOC application has been reviewed  
16 and approved by the agency before implementation. In addition, the permittee must comply with  
17 both the applicable requirements governing the changed and the proposed terms and conditions  
18 until the agency takes final action. Any change made through the MM process is not covered by  
19 the AOP permit shield, therefore there is risk associated with the change to be challenged and  
20 new applicable requirements being amended to the AOP by a MM.

21 ***If this revision is not what is required to change the Hanford Site AOP, please review the***  
22 ***following other types of modifications and revisions.***

### 23 Responsibilities

#### 24 Hanford Site

- 25 1. Develop the MM by emission unit by using the form following this section. The form, if  
26 filled out correctly and completely shall furnish the information required of an MM  
27 notification. In addition, a NOC/License revision, or new source permit application, or  
28 can be used or attached to the MM as a mechanism to complete the form.
- 29 2. Determine if the modification request is for group processing (refer to Group Processing  
30 Discussion)
- 31 3. Seek consensus with the site contractor for the AOP prior to submittal of the request.
- 32 4. Submit a MM to the AOP via a letter to DOE and request DOE to submit the MM to the  
33 agencies. On the submittal request, copy organizations that retain a copy of the AOP or  
34 request the lead agency to notify AOP holders. Prepare and submit forms for Ecology to  
35 use to notify the Administrator, tribes, and affected states as required under WAC 173-  
36 401-810 and 173-401-820
- 37 5. Ensure the MM form/request has a signed certification per WAC 173-401-520.
- 38 6. Permittee can make the change following submittal of the request to administrator (EPA)  
39 and permitting authority (Ecology). [WAC 173-401-725(2)(f)]. If the MM is associated  
40 with a NOC approval or application for a new emission unit, then the permittee must  
41 ensure that the NOC application has been reviewed and approved by the agency before

1 implementation. In addition, the permittee must comply with both the applicable  
2 requirements governing the changed and the proposed terms and conditions until the  
3 agency takes final action.

#### 4 Agency Action

- 5 1. Review and concur (or deny) proposed changes within 90 days of Ecology's receipt of a  
6 MM application or 15 days after the end of the Administrator's 45 day review period,  
7 whichever is later, Ecology will:
  - 8 • Issue the AOP modification as proposed,
  - 9 • Deny the AOP modification application,
  - 10 • Determine that the requested modification does not meet the AOP MM criteria  
11 and should be reviewed under the significant modification procedures or
  - 12 • Revise the draft AOP modification and transmit to the Administrator the new  
13 proposed AOP modification as required by WAC 173-401-810.
- 14 2. Within five (5) working days of receipt of a complete AOP MM, Ecology will meet its  
15 obligation under WAC 173-401-810 and 173-401-820 to notify the Administrator, tribes,  
16 and affected states of the requested AOP modification. Ecology promptly will send any  
17 notice required under WAC 173-401-820(2) to the Administrator.
- 18 3. Concurrent with the notice to the Administrator, tribes and affected states, Ecology will  
19 submit to the AOP register a notice of each proposed minor AOP modification.  
20 Publication in the next available issue of the AOP register will signal the beginning of a  
21 public comment period of 21 days. Each notice must describe the proposed revisions and  
22 specify the deadline to file comments with Ecology on the proposed modification (Figure  
23 3).
- 24 4. At the conclusion of 21 day public comment period, resolve comments if any, and submit  
25 to EPA for its 45 day review.
- 26 5. The permit shield under WAC 173-401-640 shall not extend to minor permit  
27 modifications.  
28  
29

**1 B-6 Group Processing of MMs Discussion (WAC 173-401-725(3))**

2 Minor permit modifications are allowed under WAC 173-401-725(3):  
 3 Group processing of minor permit modifications. Consistent with this subsection, the permitting  
 4 authority may process groups of a source's applications for certain modifications eligible for minor permit  
 5 modification processing.  
 6 (a) Criteria. Group processing of minor permit modification may only be used for those permit  
 7 modifications:  
 8 (i) That meet the criteria for minor permit modification procedures under subsection (2)(a) of this section;  
 9 and  
 10 (ii) That collectively are below ten percent of the emissions allowed by the permit for the emissions unit  
 11 for which the change is requested, twenty percent of the applicable definition of major source in WAC  
 12 173-401-200, or five tons per year, whichever is least.

**13 Method**

14 [Note: It is possible a MM may be used for something not listed below, check with the site contractor responsible for the AOP.]  
 15

16 Using the requirements listed above in the box, a MM for the Hanford Site AOP would be  
 17 developed and submitted for any of the following:

- 18 • A Group Processing can only contain more than one MM either being submitted or which  
 19 an agency has received and is agreed by the permittee to process as a group.
- 20 • The group as a single application (grouping of MM, more than one) must be below the  
 21 least/lowest one of the following:
  - 22 ○ Ten percent of the emissions allowed for the emissions unit for which the change  
 23 is being requested, means that if I have two MMs for two emission units and the  
 24 emissions allowed for these two emission units is 10 pounds per year, then the  
 25 group MM change in emissions must be less than 1 pound per year, or
  - 26 ○ Twenty percent of the applicable definition of major source [10 tons per year for  
 27 hazardous air pollutants, 25 tons per year or more of any combination of such  
 28 hazardous air pollutants], or [100 tons per year or more of any air pollutant),  
 29 means 20 percent of either 10 tons per year, 25 tons per year or 100 tons per year  
 30 {or more means if Hanford is a major source because it emits more than 25 or 100  
 31 tons per year you would then use that number} the group process MM would be  
 32 less than 2.5, 5 or 20 tons per year, respectively, or
  - 33 ○ The group MM would have emission less than five tons per year,

**34 Responsibilities**

35 In addition to the requirements for filing a Minor Modification request (previously discussed) the  
 36 group processing request needs to include a list of the permittee's other pending applications (i.e.  
 37 notice of construction applications or notice of construction revision forms plus the completed  
 38 forms) awaiting group processing, and a determination of whether the requested modification,  
 39 aggregated with these other applications, equals or exceeds the threshold. The group processing  
 40 requires a certification and notification forms for the administrator, tribes and affected states.

41 The advantage of group processing is that the modifications are held by the agency and added to  
 42 the AOP as a single action, thus avoiding several, and possibly overlapping, public reviews. The  
 43 permittee is still allowed to make the change immediately after a complete application is filed,

1 provided that any regulatory agency approval/license has been reviewed and approved by the  
2 agency [WAC 173-401-725(2)(f)]. Concurrent with the notice to the Administrator, tribes and  
3 affected states, Ecology will submit to the AOP register a notice of each proposed minor AOP  
4 modification. Publication in the next available issue of the AOP register will signal the  
5 beginning of a public comment period of 21 days. The agency must complete the group  
6 processing AOP modification process within 180 days after receipt of the first group  
7 modification request or 15 days after the end of the Administrator's 45 day review/approval,  
8 whichever is later.

9 Any change made through the Group MM process is not covered by the AOP permit shield,  
10 therefore there is risk associated with the change to be challenged and new applicable  
11 requirements being amended to the AOP by a Group MM.

12 ***If this revision is not what is required to change the Hanford Site AOP, please review the***  
13 ***following other types of modifications and revisions.***

14

DRAFT

1 **HANFORD SITE AIR OPERATING PERMIT**

2 **Minor Permit Modifications Request**

3 **Permit Number 00-05-006**

4 *Attach the completed Notification of Permit Modification Request Form to the EPA/Tribes/Affected States.*

5 Minor permit modifications are allowed under WAC 173-401-725(2): 6 <ul style="list-style-type: none"> <li>7 <span style="display: inline-block; width: 1em; margin-left: -1em;">▪</span> Does not violate any applicable requirement,</li> <li>8 <span style="display: inline-block; width: 1em; margin-left: -1em;">▪</span> Does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit,</li> <li>9 <span style="display: inline-block; width: 1em; margin-left: -1em;">▪</span> Is not a Title I modification.</li> </ul>
---

10 Provide the following information pursuant to WAC-173-401-725(2)(b)

<b>Description of the change:</b>	
<b>Describe the emissions resulting from the change:</b>	
<b>Describe the new applicable requirements that will apply as a result of the change:</b>	
<b>Suggested Draft Permit Language:</b>	
<i>For example:</i>	
<ul style="list-style-type: none"> <li>▪ <i>Monitoring/PCM that will be used to support compliance determination/certification.</i></li> <li>▪ <i>Description of air pollution control equipment (abatement technology).</i></li> <li>▪ <i>Other controls such as limits on inventory; process limits such as throughput, hours of operation, or acceptance criteria; or other assumptions used in potential to emit calculations.</i></li> <li>▪ <i>Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.</i></li> </ul>	
<b>CERTIFICATION</b>	
<i>Provide certification pursuant to (WAC 173-401-725(2)(b)(iii))</i>	
I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete. I also certify that the proposed modification meets the criteria for use of minor permit modification procedures, as hereby requested.	
Responsible Official:	
Title:	
Signature:	Date:

**HANFORD SITE AIR OPERATING PERMIT**

**Group Processing of Minor Permit Modifications Request**

**Permit Number 00-05-006**

*Attach the completed Notification of Permit Modification Request Form to the EPA/Tribes/Affected States.*

Group processing of minor permit modifications are allowed under WAC 173-401-725(3):

- That meet the criteria for minor permit modification procedures under subsection (2)(a) of this section; and
- That collectively are below ten percent of the emissions allowed by the permit for the emissions unit for which the change is requested, twenty percent of the applicable definition of major source in WAC 173-401-200, or five tons per year, whichever is least.

Provide the following information pursuant to WAC-173-401-725(3)(b):

<b>Description of the change:</b>	
<b>Describe the emissions resulting from the change:</b>	
<b>Describe the new applicable requirements that will apply as a result of the change:</b>	
<b>Suggested Draft Permit Language:</b>	
<i>For example:</i>	
<ul style="list-style-type: none"> <li>▪ <i>Monitoring/PCM that will be used to support compliance determination/certification.</i></li> <li>▪ <i>Description of air pollution control equipment (abatement technology).</i></li> <li>▪ <i>Other controls such as limits on inventory, process limits such as throughput, hours of operation, or acceptance criteria, or other assumptions used in PTE calculations.</i></li> <li>▪ <i>Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.</i></li> </ul>	
<b>List all other pending applications waiting group processing:</b> (WAC 173-401-725(3)(b)(iv))	
<b>Determination that group is below emission threshold:</b> (WAC 173-401-725(3)(b)(iv))	
Do the emissions stated in this permit modification request added to the emissions from the minor modification requests listed below equal or exceed the group processing thresholds? (Y or N)	
<b>CERTIFICATION</b>	
<i>Provide certification pursuant to (WAC 173-401-725(3)(b)(v))</i>	
I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete. I also certify that the proposed modification meets the criteria for use of group processing of minor permit modification procedures, as hereby requested.	
Responsible Official:	
Title:	
Signature:	Date:

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1 **Notification of Permit Modification to EPA-Region 10, the Tribes, and Affected**  
 2 **States**

3 Attached is a request to revise the Hanford Site Air Operating Permit. This form serves as  
 4 notification to EPA, tribes, and affected States of a request for an Air Operating Permit  
 5 Modification per WAC 173-401-725(2), (3) and (4).

<b>Air Operating Permit Number:</b> 00-05-006	
<b>Source:</b> U.S. Department of Energy, Hanford Site	
<b>Mailing Address:</b>	<b>Physical Address:</b>
<b>Brief Description:</b>	
<b>Contact Name:</b>	<b>Phone:</b>
<b>Title:</b> Manager U.S. Department of Energy	
<b>FOR ECOLOGY USE ONLY</b>	
<b>Application Number:</b>	<b>Date Received:</b>
<b>Ecology Contact:</b>	
<b>Date of Publication in Permit Register:</b>	<b>Public Comment Period Ends:</b>

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## 1 **B-7 Significant Modification (SM) (WAC 173-401-725(4))**

2 Significant permit modifications are allowed under WAC 173-401-725(4) for those modifications that do  
3 not meet the requirements for a minor permit modification or an administrative amendment.

### 4 Method

5 [Note: It is possible a SM may be used for something not listed below, check with the site contractor responsible for the AOP.]

6 The SM is not used for a revision to the permit that should be addressed under a CNRR or OPC,  
7 or a MM. SM procedures shall be used for applications requesting permit modifications that do  
8 not qualify as minor permit modifications or as administrative permit amendments. Every  
9 significant change in existing monitoring permit terms or conditions and every relaxation of  
10 reporting or recordkeeping permit terms or conditions shall be considered significant.

11 SM shall meet all requirements of WAC 173-401, including those for applications, public  
12 participation, review by affected states, and review by EPA, as they apply to permit issuance and  
13 permit renewal. A SM can be implemented on the date of its approval. Any change made  
14 through the SM process is covered by the AOP permit shield.

### 15

### 16 Responsibilities

#### 17 Hanford Site Actions

- 18 1. Develop the SM by emission unit by using the form following this section. The form, if  
19 filled out correctly and completely shall furnish the information required of an MM  
20 notification. In addition, a NOC/License revision, or new source permit application, or  
21 can be used or attached to the SM as a mechanism to complete the form.
- 22 2. Seek consensus with the site contractor for the AOP prior to submittal of the request.
- 23 3. Submit a SM to the AOP via a letter to DOE and request DOE to submit the SM to the  
24 agencies. On the submittal request, copy organizations that retain a copy of the AOP or  
25 request the lead agency to notify AOP holders. Prepare and submit forms for Ecology to  
26 use to notify the Administrator, tribes, and affected states as required under WAC 173-  
27 401-810 and 173-401-820
- 28 4. Ensure the SM form/request has a signed certification per WAC 173-401-520.
- 29 5. Permittee can make change only after issuance of the permit revision by the agency.

#### 30 Agency Actions

- 31 1. Provide EPA a copy of permit application.
- 32 2. Maintain and update permit register.
- 33 3. Determine notice of construction application completeness.
- 34 4. Prepare and publish public notices and/or public hearing.
- 35 5. Conduct 30 day public and affected states review period
- 36 6. Respond to any public and affected state's comments, prepare responsiveness summary,  
37 and revise application accordingly
- 38 7. Provide to EPA for 45 day review
- 39 8. Issue within 15 days after EPA review/approval or deny change

- 1 9. Update and publish modified AOP as required
- 2 10. Complete review on the majority of significant AOP modifications within 9 months after
- 3 receipt of a complete notice of construction application
- 4

DRAFT

1 **HANFORD SITE AIR OPERATING PERMIT**

2 **Significant Permit Modification Request**

3 **Permit Number 00-05-006**

4 Significant permit modifications are allowed under WAC 173-401-725(4) for those modifications that do  
 5 not meet the requirements for a minor permit modification or an administrative amendment.

6 Provide the following information pursuant to WAC-173-401-725(4)

<b>Description of the change:</b>	
<b>Describe the emissions resulting from the change:</b>	
<b>Describe the new applicable requirements that will apply as a result of the change:</b> (To be provided in the agency approval order.)	
<b>Suggested Draft Permit Language:</b> <i>For example:</i>	
<ul style="list-style-type: none"> <li>▪ <i>Monitoring/PCM that will be used to support compliance determination/certification.</i></li> <li>▪ <i>Description of air pollution control equipment (abatement technology).</i></li> <li>▪ <i>Other controls such as limits on inventory, process limits such as throughput, hours of operation, or acceptance criteria, or other assumptions used in Potential-to-Emit calculations.</i></li> <li>▪ <i>Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.</i></li> </ul>	
<b>CERTIFICATION</b>	
<i>Provide certification pursuant to (WAC 173-401-520)</i>	
I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete.	
Responsible Official:	
Title:	
Signature:	Date:

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1 **Notification of Permit Modification EPA-Region 10, the Tribes, and Affected States**

2 Attached is a request to revise the Hanford Site Air Operating Permit. This form serves as  
 3 notification to EPA, tribes, and affected States of a request for an Air Operating Permit  
 4 Modification per WAC 173-401-725(2), (3) and (4).

<b>Air Operating Permit Number:</b> 00-05-006	
<b>Source:</b> U.S. Department of Energy, Hanford Site	
<b>Mailing Address:</b>	<b>Physical Address:</b>
<b>Brief Description:</b>	
<b>Contact Name:</b>	<b>Phone:</b>
<b>Title:</b> Manager U.S. Department of Energy	
<b>FOR ECOLOGY USE ONLY</b>	
<b>Application Number:</b>	<b>Date Received:</b>
<b>Ecology Contact:</b>	
<b>Date of Publication in Permit Register:</b>	<b>Public Comment Period Ends:</b>

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