From:	Gent, Philip (ECY)
To:	"Miskho, Anthony G"
Cc:	Kaldor, Reed A; Bowser, Dennis W; Trimberger, Bryan R; Jackson, Dale E (dale.jackson@rl.doe.gov); Schleif, Stephanie (ECY); Skorska, Maria (ECY); Skinnarland, Ron (ECY)
Subject:	RE: AOP files: WRPS comment
Date:	Thursday, February 19, 2015 10:01:00 AM

Tony,

I will amend the draft AOP for the WRPS NSPS Subpart IIII sections to the condition approval shown below.

As we discussed on the phone, if compliance requirement (2) below is used – it is important to note that the term "with good air pollution control practices for minimizing emissions". Specifically, if a WRPS generated maintenance plan deviates from the manufacture's written instructions for installation, configuration, operation, or maintenance in a manner that 'relaxes' the manufacturer's written instructions it cannot meet good air pollution control practices for minimizing emissions without some form of compensatory action(s).

An example of this would be creating a maintenance plan that only differs from the manufacturer's written instructions by changing the requirement for engine oil change after 'X' hours of operations in the manufacturer's written instructions to '2X' hours in the WRPS maintenance plan. This is clearly a relaxation of standards with no compensatory action to offset increased emission (or potential emissions). I can conceive of various actions WRPS could place into the maintenance plan that would minimize emissions (e.g. collect the exhaust and 'treat-it', install additional pollution abatement devices on each engine, etc…). Or WRPS could install monitoring devices on each engine to monitor the emission conditions below for NMHS, NOX, CO, and PM on an hourly basis to ensure the engines are complying with the condition.

The bar for WRPS to prove to Ecology their maintenance plan, if deviating from the manufacturer's written instructions, will minimize emissions is difficult. Ecology understands WRPS is not required to submit a maintenance plan to Ecology for approval before implementing it, however the Nuclear Waste Program Air Program will apply the logic presented in this email to evaluate any and all WRPS maintenance plan(s) during inspections or inquires related to WRPS NSPS Subpart IIII engines. If a WRPS maintenance plan doesn't meet the minimizing emission requirement, then all engines associated with that maintenance plan will be deemed out of compliance.

Condition Approval

Condition:

(1) Non-methane hydrocarbons (NMHC) and nitrogen oxides (NO_X) emission limit of 7.5 g/KW-hr.

(2) Carbon monoxide (CO) emission limit of 6.6 g/KW-hr.

(3) Particulate matter emission limit of 0.40 g/KW-hr.

Compliance Requirement:

(1) Compliance will be determined by operating and maintaining the engine in accordance with the manufacturer's recommendations or instructions **OR**

(2) If the engine and control device is not installed, configured, operated, or maintained according to the manufacturer's

emission-related written instructions, or the emission-related settings are changed in a way that is not permitted by the manufacturer, then:

- Keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engines in a manner consistent with good air pollution control practices for minimizing emissions.

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Required Records: (1) Manufacturer's maintenance or operation manual.
(2) Documentation of maintenance performed.
(3) Maintenance plan, as appropriate.

State-Only: No

Calculation Model: Not applicable.

Philip Gent, PE
Waste Management Section
Nuclear Waste Program
Washington Department of Ecology
Phone: (509) 372-7983
Email: pgen461@ecy.wa.gov
FAX: (509) 372-7971

From: Miskho, Anthony G [mailto:Anthony_G_Miskho@rl.gov]
Sent: Wednesday, February 18, 2015 2:12 PM
To: Gent, Philip (ECY)
Cc: Kaldor, Reed A; Bowser, Dennis W; Trimberger, Bryan R; Miskho, Anthony G
Subject: RE: AOP files: WRPS comment

Phil:
Thank you for your time over the last couple of days to help arrive at comments for the WRPS engines found in Sections 1.4.64 through 1.4.69 of draft Attachment 1.

Our two comments on Attachment 1 are as follows:

1. Add in the 7th form to the 6 being proposed (Adding in the Waste Transfer Corridor West) consistent with the forms emailed to you on 12/18/2014. This action has already been completed by you based on our discussions.
2. Modify each of the WRPS forms for the condition demonstrating compliance with the emission standards for NOx, CO, and particulate to include the option under 40 CFR 60.4211(g)(1) for a maintenance plan. Also add the "Maintenance Plan, as appropriate" as the 3rd required record for the section.

If you have any questions from the email, please let me know.
Tony

WRPS, Air permitting lead

From: Kaldor, Reed A
Sent: Wednesday, February 11, 2015 4:46 PM
To: Burrell, Joe G; 'nroe@arescorporation.com'; Barnett, Matthew; Karschnia, Paul T; Hadley, Karl A; Duchsherer, Cheryl J; 'Haggard, Bob'; Miskho, Anthony G
Cc: McDonald, Kent M; Lerch, Jeffrey A; Engelmann, Richard H; Butler, Drusilla H; Trimberger, Bryan R; Borneman, Lucinda E; Jackson, Dale E; Bowser, Dennis W; 'TOM.MCDERMOTT@PNSO.SCIENCE.DOE.GOV'; Gent, Phil (Washington Department of Ecology)
Subject: FW: AOP files

As discussed in the RATSI meeting this morning, Ecology is preparing Revision B of AOP Renewal 2 with a desire to begin public comment on March 8, 2015. Revision B is primarily a reformatting of the Permit although there are a few changes to the emission units in Attachment 1 (Ecology permitting conditions). The vast majority of the changes are in associated with Attachment 1, although there have been a few changes made in the Standard Terms and General Conditions (STGC) and Statements of Basis for the STGC and Attachment 1. Attachment 2 (Health permitting conditions) is not open for comment and the Statement of Basis for Attachment 2 is not yet ready for review. No changes are being made to Attachment 3.

Phil has agreed to let us have a quick look at the revised STGC, Attachment 1 and Statements of Basis before it goes out for public comment and has requested comments by 2/19/15. Given the quick turnaround needed and Monday being a holiday, please provide your comments directly to Phil and copy me. Thanks for your efforts. Contact me if you have any questions.

Reed

From: Gent, Philip (ECY) [mailto:pgen461@ECY.WA.GOV]
Sent: Wednesday, February 11, 2015 11:34 AM
To: Kaldor, Reed A
Subject: AOP files

Reed,

For you to distribute.

I would like to have responses by COB 2/19/2015

Philip Gent, PE
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Washington Department of Ecology

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