



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

August 18, 2010

Mr. David A. Brockman, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Closeout of Air Emissions Permit Inspection – 200 Area Diffuse and Fugitive Emissions Permit

Dear Mr. Brockman:

This letter transmits the results of an inspection conducted May 11, 2010, by the Department of Ecology (Ecology) of Hanford Site air emission sources regulated under Washington Administrative Code (WAC) 173-400, WAC 173-401, and WAC 173-460.

The 200 Area Diffuse and Fugitive Emissions unit has been permitted to conduct tank farm facilities upgrades and operate three boilers under ORDER DE00NWP-001R1. Ecology inspected the facility for routine assessment of compliance and determination of construction status of permitted operations. Our investigation determined that the operations have not been entirely constructed and that maintenance for a boiler was not in compliance with requirements of the permit.

In accordance with Chapter 173-400-110(9) Washington Administrative Code, Ecology finds that authorization to construct, install, and operate two of the three boilers authorized in ORDER DE00NWP-001R1 is void. Ecology herein issues ORDER DE000NWP-001, Rev. 2.

This permit revision:

- Removes authorization to construct, install, or operate additional boilers beyond current installation.
- Modifies boiler maintenance requirements to ensure appropriate control upon and after boiler startup.
- Addresses revision of Toxic Air Pollutants removed from WAC 173-460 in June 2009, addresses editorial changes due to revision of ORDER 94-07 on May 7, 2008, regarding emissions control for 241-AY and 241-AZ tank farms.



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You do not need to take action. Ecology will initiate amendment of the Hanford Air Operating Permit (AOP), # 00-05-006 Renewal 1, to identify the permit revision. Should you wish to appeal the withdrawal of the two boiler authorizations contained within ORDER DE00NWP-001R1 or issuance of ORDER DE000NWP-001, Rev. 2, you may do so in the manner detailed in the enclosed ORDER.

Condition 1.B of ORDER DE00NWP-001R1 required conduct of boiler maintenance at least annually. Our inspection determined that no such firing maintenance upon AN241-POR34-RW-BLR-101 had been conducted since installation. However, it was also determined that you had not operated the boiler for any purpose since installation and thus caused no substantive air emissions injury. Our inspection and document review also indicated that your annual AOP Compliance Certifications for 2007 and 2008 falsely claimed compliance with Condition 1.B of ORDER DE00NWP-001R1. Your 2009 AOP Compliance Certification has continued the same reported condition. Ecology is not issuing formal enforcement action regarding these violations but is issuing a Notice of Correction. Enclosed please find your Notice of Correction.

If you have any questions or require additional information regarding this letter, please contact me at 509-372-7924.

Sincerely,



Ron Skinnarland
Manager, Waste Management Section
Nuclear Waste Program

Enclosures:

1. ORDER DE00NWP-001, Rev. 2
2. Notice of Correction, Docket No. 7901

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cc w/encs: Dennis Bowser, USDOE
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