Hanford Air Operating Permit

Renewal

Responsiveness Summary

WASHINGTON STATE
DEPARTMENT OF
ECOLOGY

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

October 5, 2006
Publication Number: 06-05-018

RESPONSIVENESS SUMMARY

Prepared by:

Oliver Wang, P.E.

Doug Hendrickson, P.E.

Washington State Department of Ecology

Nuclear Waste Program

October 5, 2006

Publication Number: 06-05-018

If you need this publication in an alternate format, please call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Introduction

The Washington State Department of Ecology encouraged the public to comment on the renewal of the Hanford Site Air Operating Permit (AOP) during a public comment period held July 10 through August 11, 2006. The AOP regulates air emissions on the Hanford Site. The current permit will expire this year and is up for renewal. WAC 173-401 requires all AOPs be renewed every five years. In 2005, USDOE submitted the renewal application and supporting materials for agency review. The current permit remains in effect during permit renewal.

The following responsiveness summary addresses public comments received during the public comment period. Ecology received 481 comments on the draft permit renewal. The comments focused on the following issues:

- Specific details of the regulatory authority, operational status, controls, and reporting for radionuclide emission sources.
- Reporting and certification of minor emission sources.
- Re-evaluation of related support facilities for inclusion within the permit.
- Transition of facilities out of the permit upon initiation of closure and demolition.
- Incorporation of recent facility permit changes affected through the Notice of Construction process

Response to Comments

See table with comments and responses in the attachments section.

Summary of Public Involvement Actions

A hearing was held on July 26, 2006 at 7 p.m. at the Ecology office in Richland, Washington. Nine members of the public attended the hearing. A focus sheet was mailed to approximately 900 highly interested members of the public. An email to the Hanford Listserv announced the comment period and directed members of the public to the Ecology website, www.ecy.wa.gov/programs/nwp/commentperiods.htm, for more information. Notice of the comment period was placed in the Ecology events calendar. A public announcement legal classified advertisement was placed in the Tri-City Herald informing the public about the public hearing and the comment period. The advertisement ran on June 25, 2006. The comment period was also placed in the State Permit Register. The draft permit and focus sheet were sent to the State Information Repositories for availability during the comment period.

Attachments

Comments Received and Responses to Comments
Comment letters
Public Announcement Classified Ad
Focus Sheet
Hanford-Info Listserv notice

Comment #	Date	Source	Document Location	Comment	Response
1	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 5.0	The Obsolete Date for EUID 197, 305 B Building is incorrect. Recommendation: Change date to 7/20/2006	Ecology Agrees.
2	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 5.0	The Obsolete Date for EUID 307, EP-3020-01-S is incorrect. Recommendation: Change date to 12/28/2004	Ecology Agrees.
3	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 5.0	The Obsolete Date for EUID 348, 306 W-03-V is incorrect. Recommendation: Change date to 12/28/2004	Ecology Agrees.
4	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 5.0	The Obsolete Date for EUID 419, EP-3720-01-S is incorrect. Recommendation: Change date to 7/21/2004	Ecology Agrees.
5	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 6.0	The Obsolete Date for EUID 197, 305 B Building is incorrect. Recommendation: Change date to 7/20/2006	Ecology Agrees.
6	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 6.0	The Obsolete Date for EUID 412, 331 Building, NOC ID 143 is incorrect. Recommendation: Change date to 2/14/2002	Ecology Agrees.
7	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 6.0	Under EUID 412, the NOC ID 158 is not associated with this emission unit. Recommendation: Delete all information associated with NOC ID 158 under EUID 412.	Ecology Agrees.
8	7/26/06	Mr. J. Matthew Barnett	Attachment 2, Statement of Basis – Section 6.0	EUID 509 is missing for emission unit EP-331-02-S, 331 Building. Recommendation: Please add EUID 509 for the EP-331-02-S emission unit at the 331 Building to this section. It includes: NOC ID 95, Project Title: Radon Generator, Obsoleted on 12/30/2002 (Permit Number AIR 95-803) and, NOC ID 158, Project Title: Radon Generator – Location Change, Obsoleted on 12/30/2002 IPermit Number AIR 96-506)	Ecology Agrees. A new EU ID 1180 has been created.
9	7/26/06	Mr. J. Matthew Barnett	Attachment 2, (WDOH), EU_ID 175	For the 318 Building, EUID 175 the action under Condition 2, Paragraph 2 to install a single stage HEPA filter into the exhaust flow duct in Room 126 has been completed. Recommendation: Recommend removing this paragraph from the permit.	Ecology Agrees.
10	7/28/06	Mr. Bill Green	SOB for Standard Terms and Conditions, Comment 1. Page 2 of 59; Definition of Permitting Authority:	The term "Permitting Authority" has a regulatory definition [see WAC 173-401-200(23)]. Either chose a different term that is not defined by regulation or replace the definition of "Permitting Authority" on page 2 with the definition contained in WAC 173-401-200(23). The regulatory definition reads, ' "Permitting authority" means the department of ecology, local air authority, or other agency authorized under RCW 70.94.161 (3)(b) and approved by EPA to carry out a permit program under this chapter.' DISCUSSION: Ecology is the single "permitting authority", as defined by WAC 173-401-200(23) for the Hanford Site AOP. Additionally, Ecology is not free to use an AOP or supporting documentation to create or modify a regulation.	Ecology Agrees. According to the definition in WAC 173-401, the commenter is correct. A more general term, "permitting agency," will be used wherever applicable in this AOP to avoid the confusion. The term "permitting authority" is to be used strictly according to the definition in WAC 173-401-200(23).
11	7/28/06	Mr. Bill Green	SOB for Standard Terms and Conditions, Comment 2. Page 10 of 59; "Pacific EcoSolution Corporation, Richland Facility"	a) Update this paragraph as the information appears to be several years old. Specifically address the financial relationship between DOE and Pacific EcoSolution Corporation (PEcoS). Also consider the current regulatory impact on the ability of PEcoS to secure business unrelated to DOE. Then reevaluate PEcoS as a support facility. b) Create a public review file containing all information used in the re-evaluation of PEcoS as a Hanford Site AOP support facility. DISCUSSION: It is my understanding the percentage of PEcoS service output provided to DOE is far closer to 100%, as opposed to less than 50%, as stated. I also understand PEcoS could not exist as a company without DOE as a customer. I further understand PEcoS could not reasonably find other customers in today's regulatory climate. By controlling the financial relationship, DOE in effect controls PEcoS. PEcoS should therefore be considered a support facility and should be included in the AOP. During public review for the dangerous waste permit ATG (now PEcoS), it was revealed the process used at PEcoS was developed across the highway at Hanford. While a laboratory-scale test of the process was conducted no pilot-scale test ever occurred. Rather, the first commercial installation at ATG (now PEcoS) also served as the pilot test. This pilot test was apparently accompanied by contract(s) for work from DOE's	Ecology Agrees. This paragraph will be updated to reflect current operations and determinations. A determination of applicability of the PEcoS facility for incorporation into this AOP has been undertaken. The determination has reaffirmed that the facility is independently owned and operated, that no contractual control of PEcoS by USDOE or its subcontractors is exhibited, and that it meets no other criteria for applicability under WAC 173-401-300. Current PEcoS operations have not altered with respect to prior exclusion of ATG. PEcoS will not be incorporated into this permit.

Comment #	Date	Source	Document Location	Comment	Response
				Hanford Site. The dangerous waste permitting process did include public review. However, granting of the radioactive license proceeded without public review. What the license approved was a flawed operation where the plant process controls were located immediately under the melting tank. When the melting tank failed, resulting in a 1500 gallon spill of radioactive material, the plant process controls were also radioactively contaminated. The permitting authority needs to provide complete and accurate information to support their claim PEcoS should be excluded from Hanford's AOP. Absent such information, the public review process is meaningless.	
12	7/28/06	Mr. Bill Green	SOB for Standard Terms and Conditions, Comment 3. Page 12 of 59; Livingston Rebuild Center, Inc.	Remove Livingston Rebuild Center, Inc. This commenter understands they are no longer in business. Tri City Railroad Co. now occupies that space.	Ecology Agrees. Ecology agrees with the commenter to remove Livingston Rebuild Center from the Statement of Basis. Tri-City and Olympia Railroad now replaces Livingston Rebuild Center, and manages the Port of Benton short line rail with access to Burlington Northern Santa Fe and Union Pacific. The fact will be mentioned under "Port of Benton Facilities" in Section 2.0 of the Statement of Basis for Standard Terms and General Conditions.
13	7/28/06	Mr. Bill Green	SOB for Standard Terms and Conditions, Comment 4. Page 12 of 59; All Port of Benton Facilities.	Limit the Port of Benton Facilities to only those tenants that can not be considered support facilities. Include Bechtel's lay-down yard in the AOP. DISCUSSION: One of the tenants of the Port of Benton Industrial Park is Bechtel's Vitrification Plant receiving area (located in the 1171 building) and their lay-down yard, which occupies a large portion of the former Hanford 1100 Area. This commenter believes BCAA has written at least one citation for fugitive dust emanating from Bechtel's lay-down yard. This lay-down yard is adjacent to the Hanford Site (across a highway/road from the Hanford 3000 Area). It exists totally to support a DOE funded Hanford Site project. It is a demonstrated source of fugitive dust with a poor compliance history. Lastly, it is very likely to remain active until 2019, when construction of the vitrification plant is expected to be complete (Annette Cary, "Estimated cost of Hanford's vitrification plant may increase", Tri-City Herald, July 18, 2006).	Ecology Agrees. The facility (or facilities) that qualify as a "Hanford support facility" shall be included in the Hanford AOP as part of the Hanford source. The Bechtel WTP laydown yard will be considered a Hanford insignificant emission unit.
14	7/28/06	Mr. Bill Green	SOB for Standard Terms and Conditions, Comment 5. (editorial) Page 21 of 59; Subsection 5.2	"Subsection 5.2 on Inapplicable Requirements describes how some requirements are not subject to certain requirements." Please edit this sentence. As is, it makes no sense.	Ecology Agrees. The sentence is modified to read as "Subsection 5.2 on Inapplicable Requirements described why certain regulatory requirements are not applicable to Hanford operation."
15	7/28/06	Mr. Bill Green	SOB for Standard Terms and Conditions, Comment 6. Page 34, 35 and 36 of 59	The paragraph that reads: "WDOH has been provided comments under the FF-01 license comments on the latest list. WDOH has decided to only include NOCs that were obsolete for the time period representing the orginal time period of July 2001 through present time. Ecology needs to contact WDOH to obtain a word or electronic version since their review consisted of PDF files only." This paragraph indicates the document is not complete. Provide a complete copy of this SOB for public review and restart the 30 day public review and comment period. DISCUSSION: According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis (SOB) "… sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)." 40 CFR 70.7(a)(5) further states "…The permitting authority shall send this statement [of basis] to…any other person who requests it. This commenter requested an electronic copy of the SOB from Ecology, the permitting authority, for the purpose of participating in the public review and comment process as allowed by 40 CFR 70.7(h) and WAC 173-401-800. What Ecology supplied was a SOB Ecology acknowledged as being incomplete. In addition WAC 173-800(2)(e) states, in part "[T]the permitting authority must make available for public inspection, in at least one location near the chapter 401 source, all nonproprietary information contained in the permit application, draft permit and	Ecology offers the following explanation. The data are included in the body of Attachment 2. The statement mentioned by the commenter was a developmental reminder. This reminder will be deleted or modified in the "Proposed AOP." There is no compelling reason to extend the public review period.

Comment #	Date	Source	Document Location	Comment	Response
				supporting materials (emphasis added)." Documentation that provides the "legal and factual basis for the draft permit conditions" most certainly qualifies as "supporting material". Conduct of public review is certainly hampered when the agency knowingly provides incomplete "supporting material" that describes the "legal and factual basis for the draft permit conditions ".	
16	7/28/06	Mr. Bill Green	Statement of Basis For Attachment 2: Department of Health Hanford Site License FF-01, Comment 7. General comment.	Include the 2 legally binding settlement agreements between DOE/RL and Health. DISCUSSION: According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)." Conspicuously missing from this Statement of Basis are the 2 legally binding agreements between DOE/RL and Health. These agreements formally established the content of many of the Notice of Construction approval conditions.	Ecology offers the following explanation. The License stands by itself to reflect those agreements. Acceptance of the License indicates USDOE's concurrence to content in accordance with the settlement agreements. No change to the AOP is required.
17	7/28/06	Mr. Bill Green	Statement of Basis For Attachment 2: Department of Health Hanford Site License FF-01, Comment 8. General comment.	Include the memorandum of understanding between Ecology and Health. DISCUSSION: According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)." Missing from this Statement of Basis is the agreement between Ecology and Health that establishes each agency's responsibilities with regard to the Hanford Site AOP. This MOU significantly impacts structure of the AOP, and subsequent administration and enforcement.	Ecology offers the following explanation. The FF-01 contains a copy of the Memorandum of Understanding between Ecology and Health.
18	7/28/06	Mr. Bill Green	Standard Terms and Conditions, Comment 9. Page 1 of 30; 6th paragraph; 1st sentence "The regulatory agency relationships are described in the Statement of Basis (Statement)"	Include in the Statement of Basis the "MEMORANDUM OF UNDERSTANDING Between the Washington State Department of Ecology and the Washington State Department of Health Related to the RESPECTIVE ROLES AND RESPONSIBILITIES OF THE TWO AGENCIES IN COORDINATING ACTIVITIES CONCERNING HANFORD SITE RADIOACTIVE AIR EMISSIONS" signed by Ecology and Health in 2005. Also include the "MEMORANDUM OF UNDERSTANDING BETWEEN THE U.S. ENVIRONMENTAL PROTECTION AGENCY AND THE U.S. DEPARTMENT OF ENERGY concerning THE CLEAN AIR ACT EMISSION STANDARDS FOR RADIONUCLIDES 40 CFR PART 61 INCLUDING SUNPARTS H, I, Q & T", signed by EPA in 1994 and by DOE in 1995. DISCUSSION: According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)." Missing from this Statement of Basis is the agreement between Ecology and Health that establishes each agency's responsibilities with regard to the Hanford Site AOP. As stated in the MOU "The purpose of this MOU is to clarify the respective roles of Health and Ecology in the issuance and administration of air operating permits…" This MOU significantly impacts structure of the AOP, and subsequent administration and enforcement. This document should certainly be included in the AOP. The EPA-DOE MOU represents a "…mutual effort to clarify provisions of 40 CFR Part 61, Subpart H, I, Q, and T, National Emissions Standards for Hazardous Air Pollutants (NESHAP) promulgated under the Clean Air Act (CAA) for radionuclide emissions from DOE facilities. This effort has been undertaken to assure uniform and consistent interpretation of the NESHAP provisions for radionuclides at DOE facilities and EPA regional offices…" It is difficult to see how the requirements of WAC 173-401-700(8) and 40 CFR 70.7(a)(5) can be satisfied without including both of these MOUs.	Ecology Agrees. The Ecology/Health agreement is present in Attachment 2. Since the MOU clarifies the roles and responsibilities of Ecology and Health, the permitting conditions of the AOP are not affected. The EPA/DOE MOU, following delegation of 40 CFR 61 (Rad NESHAPS) to WDOH, is no longer an active document for the purposes of this AOP.
19	7/28/06	Mr. Bill Green	Standard Terms and Conditions, Comment 10. Page 10 of 30; listing of Pacific EcoSolution Corporation, Richland facility as excluded at the time of AOP renewal in 2006.	See comment #2 above. Reevaluate PEcoS for inclusion in the AOP based on current information. Specifically address the financial relationship between DOE and Pacific EcoSolution Corporation (PEcoS), and the realistic ability of PEcoS to secure business independent of DOE given the current regulatory restrictions. DISCUSSION: The decision to exclude PEcoS needs to be based on accurate	Ecology offers the following explanation. See response to Commenter's comment #2 - Comment 11 herein.

Comment #	Date	Source	Document Location	Comment	Response
				operational and business information, regulation and established regulatory precedents.	
20	7/28/06	Mr. Bill Green	Standard Terms and Conditions, Comment 11. Page 10 of 30; listing of all Port of Benton facilities as excluded at the time of AOP renewal in 2006.	See comment #4 above. Limit the Port of Benton Facilities to only those tenants that can not be considered Hanford Site AOP support facilities.	Ecology Agrees. See response to comment #4 by this commenter, comment 13 herein.
21	7/28/06	Mr. Bill Green	Standard Terms and Conditions, Comment 12. Page 10 of 30; listing of Livingston Rebuild Center, Inc as excluded at the time of AOP renewal in 2006.	See comment #3.	Ecology Agrees. See response to comment #3 by this commenter, comment 12 herein.
22	7/28/06	Mr. Bill Green	Standard Terms and Conditions, Comment 13. Page 12 of 30; Section 3.6 Permit Fees	Add a paragraph to this section stating fee process implemented for the entire AOP is consistent with Part X of the Operating Permit Regulation [WAC 173-401-900], thereby acknowledging public review opportunities guaranteed by regulation for this entire AOP. As written, this paragraph strongly suggests WAC 173-401-900 only applies to AOP Attachment 1 rather than the entire AOP. Therefore limiting public review of fee process information to only AOP Attachment 1. DISCUSSION: A review opportunity for the draft workload analysis, draft budget and fee schedule is provided by WAC 173-401-920(1)(c). This paragraph states in part: "…Ecology shall make available for public review, on or before February 28 of each even-numbered year, copies of its draft biennial workload analysis and draft biennial budget. Ecology shall make available for public review, on or before October 31 of each year, copies of its annual fee schedule. …" Ecology is the single permitting authority [WAC 173-401-200(23)] for the AOP. The radioactive license portion of the AOP is administered by the Health through a revised MOU signed by both agencies in 2005. Asbestos and open burning provisions are administered by BCAA through a delegation letter from Ecology. According to the MOU, "…Ecology's permit program costs will include permit administration costs and development and oversight costs associated with Health's regulatory activities..." Administration costs and development and oversight costs associated with BCAA's AOP regulatory activities are not addressed. However, payments for Regulation 1 activities are addressed in a 2003 MOA with DOE. While Ecology is free to enter into interagency agreements, Ecology is not free to ignore regulation, in this case WAC 173-401-900. Ecology is also not free to use an AOP or an interagency agreement to create or modify regulation or, in any way, limit public participation granted by regulation. Ecology is the permitting authority [WAC 173-401-200(23)], and therefore ultimately responsible for everything in the permit. The AOP is issued by Ecology pursuant to the Operating Permit Regulation, WAC 173-401 (i.e., the AOP was not issued under WAC 246-247 or any other state regulation). The Operating Permit Regulation includes fee determination requirements (WAC 173-401-900), which apply to the entire AOP through Ecology, the permitting authority, to any state agency for AOP work performed by that agency. Therefore, fee process implemented for the entire AOP should be consistent with the Operating Permit Regulation. [This issue is focused only on agency fee process for activities regulated by WAC 173-401. Agency costs (e.g., administration costs, development costs, oversight costs, etc.) for activities outside the AOP are beyond the scope of this comment.]	Ecology Agrees. The current practice in establishing the Biennial AOP Workload Analysis includes both Ecology and Health in WAC 173-401 related activities. Currently both Ecology and Health workload analyses are reviewed by the public in accordance with WAC 173-401-900 requirement. The BCAA's involvement in the Hanford AOP is minimal; therefore is not included in the Biennial Workload Analysis.
23	7/28/06	Mr. Bill Green	Statements of BasisComment 14. General comment on Statements of Basis:	Package all 4 Statements of Basis in a single document. It makes no sense to have 4 separate SOBs for 1 AOP.	Ecology Agrees. The Proposed AOP will be issued in two volumes, just like the existing AOP structure. The first volume is the Hanford AOP including all the enforceable conditions, and the second volume is the Statement of Basis including all bases for the AOP. No change is being made in this structure.

Comment #	Date	Source	Document Location	Comment	Response
24	7/28/06	Mr. Bill Green	Attachment 1, Comment 15. Table 1.1, pages ATT 1-6 through 1-8, and Table 1.7, pages ATT 1-85 & 86.	See comment 4. Because of its adverse compliance history, anticipated longevity, and direct association with a Hanford Site PSD source, the Bechtel Vitrification Plant lay-down yard in the former Hanford 1100 Area should be mentioned as a distinct source of fugitive dust.	Ecology Agrees. See response to comment #4 by this commenter, comment 13 herein. The WTP lay-down yard will be included as an insignificant emission unit.
25	7/28/06	Mr. Bill Green	Attachment 1, Comment 16. Page ATT 1-7, Table 1.1, top entry for some Emission Units associated with 3020.	Either provide Table 1.6 requirements for 3020-07, 08, & 09-S or correct Table 1.1. DISCUSSION: Certain 3020 emission units are shown as having requirements in Table 1.6. No such Table 1.6 requirements were found.	Ecology Agrees. The commenter's reference to Table 1.6 is appropriately addressed to Table 1.3. Requirement reference in Table 1.1 for three 300-EP-3020 boilers is Table 1.3.
26	7/28/06	Mr. Bill Green	Attachment 1, Comment 17. Page ATT 1-10 through ATT 1-12; Table 1.2.	Explain the basis for federal enforceability of RACT (WAC 173-400-040). Perhaps this could be done via footnote.	Ecology Agrees. Pages 7 and 8 of the Statement of Basis for Attachment 1 explained the federal enforceability of the RACT (reasonably available control technology). More clarification on this issue is added to Section 1.3 of the basis for Attachment 1. The Statement of Basis is more appropriate than a footnote in clarifying regulatory issues. This section has been expanded to describe application of RACT.
27	7/28/06	Mr. Bill Green	Attachment 1, Comment 18. Page ATT 1-22 and 23 ; Table 1.6; Integrated Disposal Facility (IDF)	Either supply an NOC approval order or delete this emission unit from Table 1.6. DISCUSSION: The title of Table 1.6 is: "Emission Limits and Periodic Monitoring Requirements for Emission Units with NOC Approval Conditions." According to the 1st paragraph on page ATT 1-21 "The emission units identified in this table [Table 1.6] are those emission units that have received an Ecology approval order to operate under WAC 173-400-110 New Source Review and/or WAC 173-460-040." It is therefore not appropriate to include an emission unit that lacks an NOC approval order in Table 1.6.	Ecology Agrees. The NOC Order No. DE05NWP-004 for IDF has been added.
28	7/28/06	Mr. Bill Green	Attachment 1, Comment 19. Page ATT 1-23; Discharge Point: Bulk Vitrification Demonstration Facility; condition approval in middle of page "PROPOSED GENERAL APPROVAL CONDITIONS"	Delete the word "PROPOSED". At this point-in-time the general approval conditions are enforceable and not awaiting future negotiations.	Ecology Agrees.
29	7/28/06	Mr. Bill Green	Attachment 1, Comment 20. Page ATT 1-76, 77: Bulk Vitrification Demonstration Facility, "Condition: EMISSIONS CONTROL MONITORS"; "Periodic Monitoring", "Test Methods", and "Test Frequency", and "Required Records"; Statement "Refer to Section 5.3.8 of Notice of Construction Application (NOCA)".	Include the specific monitoring, test methods, test frequency and required records rather than a reference to Section 5.3.8 of the Notice of Construction Application. DISCUSSION: The AOP is intended to capture all relevant air emission terms, conditions and limitations. It is not acceptable to reference these in a separate document. In addition, referencing a document not included in the AOP public review package effectively subverts public review.	Ecology Agrees. Section 4 of NOC DE04NWP-002 refers to Section 5.3.8 of the NOC Application for required monitoring. The AOP conditions can not be modified without first amending the NOC to explicitly define the specific monitoring, test methods, test frequency and required records. Ecology will list the specific conditions in the NOC and AOP in future amendment.
30	7/28/06	Mr. Bill Green	Attachment 1, Comment 21. (editorial) Page ATT 1-83; middle of page, approval condition "Registered Holiday Inn Promotion 6520 web-reservation between registration date of 6/7 and 8/15"	Remove this text. It appears to be an artifact from an unrelated communication.	Ecology Agrees.
31	7/28/06	Mr. Bill Green	Attachment 2, Comment 22. Pages 3 through 19; EPA partial delegation letter and Ecology/Health MOU.	Remove the partial delegation letter and Ecology/Health MOU and place them in Health's Statement of Basis. DISCUSSION: According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)." Both the EPA partial delegation letter and Ecology/Health MOU address "the legal and factual basis for the draft permit conditions". Neither address specific emission unit conditions. Health may wish to include a scan of the actual letter rather than an internet copy complete with a URL and date footer.	Ecology offers the following explanation. The license needs to stand by itself to reflect those agreements.
32	7/28/06	Mr. Bill Green	Attachment 2, Comment 23. Page 29;	Define "Source". A definition of "source" does not appear in 40 CFR 61, Subparts A or	Ecology offers the following explanation.

Comment #	Date	Source	Document Location	Comment	Response
			heading "Hanford Site License General Conditions and Limitations Applicable to Sources of Radioactive Air Emissions"	H, in WAC 173-401, or in WAC 246-247. It makes a difference whether "source" is an emission unit or the Hanford stationary source (or major stationary source) or something different.	In the definitions section of Subparts A and H both refer the reader to the following "The terms used in this part are defined in the Act or in this section as follows: Act means the Clean Air Act (42 U.S.C. 7401 et seq.)." The following is from Section 112a of the CAA: (1) Major source. - The term "major source" means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants. The Administrator may establish a lesser quantity, or in the case of radionuclides different criteria, for a major source than that specified in the previous sentence, on the basis of the potency of the air pollutant, persistence, potential for bioaccumulation, other characteristics of the air pollutant, or other relevant factors. (2) Area source. - The term "area source" means any stationary source of hazardous air pollutants that is not a major source. For purposes of this section, the term "area source" shall not include motor vehicles or nonroad vehicles subject to regulation under title II. (3) Stationary source. - The term "stationary source" shall have the same meaning as such term has under section 111(a). (4) New source. - The term "new source" means a stationary source the construction or reconstruction of which is commenced after the Administrator first proposes regulations under this section establishing an emission standard applicable to such source. (10) Existing source. - The term "existing source" means any stationary source other than a new source.
33	7/28/06	Mr. Bill Green	Attachment 2, Comment 24. Page 29, subheading "DOE Federal Facilities 40CFR61 Subparts A, H, and WAC 246-247 General Conditions and Limitations"	For clarity, edit the subheading to read "…Generally Applicable Conditions and Limitations". The text "generally applicable conditions" provides a more accurate description.	Ecology Agrees.
34	7/28/06	Mr. Bill Green	Attachment 2, Comment 25. Page 30; Section 1.0 "40CFR61 Subpart A"	For clarity, edit the heading to read "Generally Applicable Conditions from 40 CFR 61, Subpart A", or something similar.	Ecology offers the following explanation. The subheading on the previous page serves this purpose.
35	7/28/06	Mr. Bill Green	Attachment 2, Comment 26. Pages 30 through 44	Replace text on these pages with an accurate copy of the federally enforceable general conditions from 40 CFR 61, Subparts A and H. DISCUSSION: It appears Health intended to copy certain conditions from 40 CFR 61, Subparts A & H onto these pages. They then modified and re-numbered section headings and paragraphs, and deleted some internal section and paragraph text. This resulted in total nonsense. Example 1: Section 1.8, Waiver of compliance, appears on pages 33 and 34. Text in several of the paragraphs reference "…paragraphs (b)(3) and (b)(4) of this section…". There are no such paragraphs [(b)(3) or (b)(4)] in Section 1.8. Example 2: Section 2.4, Emissions monitoring and testing procedures, appears on pages 37 through 42. Text in several of the paragraphs reference "…paragraph b of this section…" or "…paragraphs b and c of this section…". There are no such paragraphs (b or, b and c) in Section 2.4. There are very likely numerous other examples. As an alternative, Health could list the specific applicable citations [e.g., 40 CFR 61.01(a), 40 CFR 61.04(b), etc.] in this section and append the entire regulation to the license. The applicable portions of the appended regulation could be highlighted for additional clarity.	Ecology offers the following explanation. 40 CFR 61 citations immediately follow the paragraph to allow the reader to find the referenced text.
36	7/28/06	Mr. Bill Green	Attachment 2,Comment 27. Page 57;	Delete this section and all occurrences of the "State Only" requirement concerning 40	Ecology offers the following explanation.

Comment #	Date	Source	Document Location	Comment	Response
			Section 4.0,	CFR 61, Appendix B, Method 114 for "minor/point sources". This is a new requirement created outside of the regulatory process. As such it is inconsistent with WAC 173-401-100(2), 40 CFR 70.1(b), and the concept a permit/license cannot create or modify regulation. As required by WAC 173-401-600(2) and 40 CFR 70.6(a)(1)(i), a regulatory citation needs to be provided for this condition. DISCUSSION: There is no such requirement in WAC 246-247 or any other state regulation enforced by Health. Also, 40 CFR 61 does not reference use of this method for any emission units other than major point sources.	This was an agreed-to condition between WDOH and the USDOE and added WAC 246-247-040(5) and 060(5) as regulatory basis. Appropriate citations are provided in the Proposed Permit.
37	7/28/06	Mr. Bill Green	Attachment 2, Comment 28. Pages 58 through 61; Section 5.0	Provide a regulatory citation for each of the requirements in Section 5.0. DISCUSSION: WAC 173-401-600(2) states "(2) Legal authority. The permit shall specify and reference the origin of and authority for each term or condition, and identify any difference in form as compared to the applicable requirement upon which the term or condition is based." See also 40 CFR 70.6(a)(1)(i).	Ecology Agrees. WAC 246-247-040(5) and 060(5) will be added to the section title.
38	7/28/06	Mr. Bill Green	Attachment 2, Comment 29. Page 62; Attachment 1 Emission Unit Specific License	Provide an emission unit-specific table of contents. Such a table would greatly improve the ease-of-use of this attachment. DISCUSSION: As a trade-off for not pressing format concerns with AOP Revision H, and on many occasions thereafter, Health committed to provide an emission unit-specific table of contents for Health's license at AOP renewal. That commitment has not yet been honored.	Ecology Agrees. The Table of Contents will be added as a PDF searchable bookmark making it easier to find and cross reference Emission Units (EU) and Notice of Construction ID numbers (NOC IDs).
39	7/28/06	Mr. Bill Green	Attachment 2, Comment 30. Pages 62 through 711; General comment for applicable to all NOC approval in "Attachment 1 Emission Unit Specific License"	Provide a regulatory citation for each term or condition as required by WAC 173-401-600(2) and 40 CFR 70.6(a)(1)(i). Many individual conditions lack such a citation.	Ecology Agrees. WAC 246-247-040(5) and 060(6) will be added at the beginning of each approval with special conditions.
40	7/28/06	Mr. Bill Green	Attachment 2, Comment 31. Pages 428, 456, 489, 596, 607 and 707; Emission units 300 Area Diffuse/Fugitive, Purgewater Modutanks, 200 Area Diffuse/Fugitive, 600 Area Diffuse/Fugitive, 100 Area Diffuse/Fugitive, and 400 Area Diffuse/Fugitive	Remove the federally enforceable requirement to monitor these "FUGITIVE, non-point source emission unit(s)" in accordance with (40 CFR 61) Appendix B, Method 114 or (40 CFR 61) Appendix B, Method 114(3). This is a mis-application of a test method contained in an appendix to 40 CFR 61 and referenced by 40 CFR 61, Subpart H. The mis-application represents a new requirement created outside of the regulatory process. As such it is inconsistent with WAC 173-401-100(2), 40 CFR 70.1(b), and the concept a permit/license cannot create or modify regulation. DISCUSSION: Fugitive emissions are defined in WAC 246-247-030(12) as "…radioactive air emissions which do not and could not reasonably pass through a stack, vent, or other functionally equivalent structure (emphasis added), and which are not feasible to directly measure and quantify". A non-point source is defined by WAC 246-247-030(18) as "…a location at which radioactive air emissions originate from an area, such as contaminated ground above a near-surface waste disposal unit, whose extent may or may not be well-defined." Method 114 is not appropriate for fugitive emission units or non-point sources of emissions. Section 1, "Purpose and Background" of Method 114 states in part "[T]this method provides the requirements for: (1) Stack monitoring (emphasis added) and sample collection methods appropriate for radionuclides; (2) radiochemical methods which are used in determining the amounts of radionuclides collected by the stack sampling (emphasis added)…". Fugitive emissions are nowhere addressed in this method. Additionally, EPA[1] (see paragraph 5a) determined "…[40 CFR 61] Subpart H provides procedures for evaluating only emissions from point sources…" REF: 1 "Memorandum of Understanding Between the U.S. Environmental Protection Agency and the U.S. Department of Energy Concerning the Clean Air Act Emission Standards for Radionuclides 40 CFR Part 61 Including Subparts H, I, Q & T", signed by EPA Assistant Secretary Mary D. Nichols on September 29, 1994 and by Department of Energy Assistant Secretary Tara O'Toole on April 5, 1995	Ecology offers the following explanation. The requirement will specify 40CFR61 Appendix B method 114(3). This method directs the quality assurance aspects of analysis of samples.

Comment #	Date	Source	Document Location	Comment	Response
41	7/28/06	Mr. Bill Green	Attachment 2, Comment 32. Pages 62 through 711;	General comment: Conspicuous by their absence are NOC approvals for the largest construction project in North America, the Waste Treatment Plant. Include them in this AOP or remove all NOC approvals. DISCUSSION: WAC 246-247-010(5) states in part "In accordance with RCW 70.94.161(10), air operating permits issued under chapter 173-401 WAC shall incorporate all applicable requirements of this chapter [WAC 246-247]…." Based on the appearance of several hundred pages of NOC approvals in the license portion of this AOP, it appears Health believes their NOC approvals are "applicable requirements". Pursuant to Health's regulation, once a NOC approval is issued and accepted, Health has no option but to include it in the AOP. This commenter readily understands the challenges of accurately capturing changing process descriptions for a massive project where construction and design are concurrent. However, rather than avoiding compliance with regulation, Health should re-assess their total reliance on an inflexible electronic system of generating NOC approvals and their use of a process description as a NOC approval condition. After all, given the same project, the PSD permitting process was successful.	Ecology offers the following explanation. The Waste Treatment Plant only has approvals to construct and has not been granted a License to Operate. When the License to Operate is granted it will be added to the AOP.
42	7/26/06	Mary-Maria F. Jarvis, Ph.D.	Attachment 2	Regarding the designation of the Building 209E (296-P-31) stack as a major emission unit in the recently-issued FF-01 License; it should be a minor emission unit.	Ecology offers the following explanation. WDOH has issued the USDOE a letter instructing them to monitor the 296-P-31 as a "major" until it is demonstrated to be a minor source.
43	7/26/06	Mary-Maria F. Jarvis, Ph.D.	Attachment 2	The B-Plant stack, 296-B-2, should be identified as closed. A Report of Closure has been filed on this former emission unit.	Ecology offers the following explanation. The 296-B-2 emission unit has not been closed due to potential diffuse and fugitive emissions. The potential diffuse and fugitive emissions from this have been demonstrated to be minor and the 296-B-2 has been moved to Table 2-1 of the FF-01 per agreement with DOE.
44	8/5/06	Mr. Bill Green	Standard Terms and Conditions, Comment 1, Page 20 of 30; Section 4.3.4 Annual Compliance Certification	Return the due date for the annual compliance certification report to July 2. Slipping the due date from July 2 to July 31 is inconsistent with 40 CFR 70.6(c)(5)(i). DISCUSSION: With regard to submittal frequency for the compliance certification report, 40 CFR 70.6(c)(5) and 70.6(c)(5)(i) state, in part "Requirements for compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. Permits shall include each of the following: (i) The frequency (not less than annually or such more frequent periods as specified in the applicable requirement or by the permitting authority) of submissions of compliance certifications". By slipping the due date even a few days (29) beyond annual, Ecology has inappropriately used this AOP to create a condition that is less strict than the underlying federal requirement. See 40 CFR 70.10(b) "(b) State failure to administer or enforce. Any State program approved by the Administrator shall at all times be conducted in accordance with the requirements of this part [40 CFR 70] …"	Ecology offers the following explanation. The annual certification report is for the compliance verification of the previous calendar year. For instance, the annual compliance certification report for the period from 1/1/2005 to 12/31/2005 is due on or before 7/31/2006. The practice is consistent with 40CFR70.6(c)(5)(i) requirement. No change to the AOP is required.
45	8/5/06	Mr. Bill Green	Standard Terms and Conditions, Comment 2, Page 20 of 30; Section 4.3.4 Annual Compliance Certification	Define "Source" or delete the term from this Section and the remainder of the AOP. A definition of "source" does not appear in 40 CFR 70, in 40 CFR 61, Subparts A or H, in WAC 173-401, or in WAC 246-247. It makes a difference whether "source" is an emission unit or the Hanford stationary source (or major stationary source) or affected source, or something different.	Ecology offers the following explanation. According to RCW 70.94, Washington State Clean Air Act, the term "source" is defined below. "RCW 70.94.030(22) "Source" means all of the emission units including quantifiable fugitive emissions, that are located on one or more contiguous or adjacent properties, and are under the control of the same person, or persons under common control, whose activities are ancillary to the production of a single product or functionally related group of products." The term "source" is used consistent with this definition in the Hanford AOP. The definition of major source is also defined in WAC 173-401-200. Text identifying Hanford as a source will be revised to provide reference.
46	8/5/06	Mr. Bill Green	Standard Terms and Conditions, Comment 3, Page 20 of 30; Section 4.3.4 Annual Compliance Certification	Provide a regulatory citation for each term or condition as required by WAC 173-401-600(2) and 40 CFR 70.6(a)(1)(i). Several individual conditions lack such a citation, including Section 4.3.4.	Ecology Agrees. As noted by the commenter, each permit term and condition must be supported with identification and reference of the origin and authority

Comment #	Date	Source	Document Location	Comment	Response
			and elsewhere		of the term or condition. It is the intent of Ecology to ensure that the permit is fully compliant with WAC 173-401-600(2) in this regard.
47	8/5/06	Mr. Bill Green	Standard Terms and Conditions, Comment 4, Page 12 of 30; Section 3.6 Permit Fees	See this commenter's comment 13 submitted on July 28, 2006. Rewrite this section to be consistent with 40 CFR 70.9. Specifically address the requirement that "…annual fees, or the equivalent over some other period, ...are sufficient to cover the permit program costs and shall ensure that any fee required by this section [40 CFR 70.9] will be used solely for permit program costs..."	Ecology Agrees. We agree with the commenter in concert with the requirements associated with fee determination and collection as enumerated in WAC 173-401-900 et. seq. Additional language will be added to stress the 40 CFR 70.9 guidance on AOP fees, and Health and BCAA involvement in workload and fee collection as necessary.
48	7/31/06	Mr. Bill Green	Attachment 2 Page 442; Emission Unit ID: 448; Hanford Site wide Site wide Vented Containers, Comment 1	(editorial) Remove one "Site wide" so the emission unit reads: Hanford Site wide Vented Containers	Ecology Agrees.
49	7/31/06	Mr. Bill Green	Attachment 2 Page 442; Emission Unit ID: 448; Hanford Site wide Site wide Vented Containers, Comment 2	Change "This is a MINOR, ACTIVELY ventilated emission unit." to "This is a MINOR, PASSIVELY ventilated emission unit." DISCUSSION: Vented containers are passively ventilated, not actively ventilated.	Ecology Agrees.
50	4/26/06	Mrs. Alisa D. Huckaby	Standard Terms and Conditions, Condition 4.5	Thank you for the opportunity to provide comment on the Hanford Site Air Operating Permit (AOP). My comment is general, but global. I request that general condition 4.5 of the Hanford AOP be modified to include and address Washington Administrative Code (WAC) 173-400-040(5) standards as reporting requirements. Specifically, general condition 4.5 "Permit Deviation Reporting" should require the permittee to report emissions which are detrimental to persons or property. Specifically, general condition 4.5 should reference WAC 173-400-040(5) and require that any and all air emissions that have caused detriment to the health, safety, or welfare of any person be reported. Also, the general condition should require that any and all air emissions that have caused damage to property or business be reported.	Ecology offers the following explanation. Section 4.5 of the General Conditions implements WAC 173-401-615(3)(b), WAC 173-400-107(3), and WAC 246-247-080(5) regarding emissions in excess of those permitted under regulation, license, or permit. The requested reporting, and the monitoring associated with such reporting, is unprecedented in regulation or permit and has no lower bound for emissions reporting. Emissions in compliance with these standards are not considered excess emissions and, as permitted, have been determined to not be detrimental to the health, safety or welfare of any person or cause damage to property or business. Section 4.5 will not be changed as requested.
51	8/11/06	Mr. Bill Green	General: HANFORD SITE AIR OPERATING PERMIT, 2006 RENEWAL (Standard Terms and Conditions)	Comment: Include a compliance plan and schedule pursuant to WAC 173-401-630(3) for those requirements for which the permittee is not in compliance. DISCUSSION: It is believed the permittee has satisfied requirements of the Federal Facility Compliance Agreement (FFCA) between EPA Region 10 and DOE signed on February 7, 1994. However, if the 1994 FFCA has not been formally closed, that agreement still needs to appear as an applicable requirement in the AOP. If the 1994 FFCA has been formally closed, a note to that effect should appear in the SOB and the 1994 FFCA should appear as an inapplicable requirement in Section 5.2 of AOP (Table 5-1, "Inapplicable Requirements."). The permittee is likely not in full compliance with the revised 40 CFR 61, Subpart H requirements for sampling and monitoring. 40 CFR 61, Subpart H was revised to contain sampling and monitoring requirements described in ANSI/HPS N13.1-1999. If this is the case, the AOP must contain a compliance plan and schedule for these requirements. [See WAC 173-401-630(3) and WAC 173-401-510(2)(h)(iii)(C).] Should the permittee be in compliance with the ANSI/HPS N13.1-1999 sampling and monitoring requirements, both the appropriate SOB and Table 5-1 should so reflect.	Ecology offers the following explanation. The EPA and USDOE entered the 1994 Hanford Site NESHAP FFCA (Federal Facility Compliance Agreement) to bring DOE's Hanford Site into compliance with 40CFR61, Subpart H. The FFCA set forth a compliance schedule ending on December 31, 2005, for the Hanford Site to evaluate the monitoring system associated with the Designated Stacks (as defined in the FFCA) and to demonstrate that those monitoring systems conform to or are equivalent to the standards for continuous monitoring systems in 40 CFR 61, Subpart H. After completed its obligations under the FFCA, USDOE issued a certification letter along with the Final Progress Report for the Hanford Site NESHAP FFCA on April 26, 2006. EPA than issued a written certification of completion of the Hanford Site NESHAP FFCA on July 26, 2006. The 1994 FFCA has been completed. Since the 1994 FFCA has already been completed, it shall not be part of the compliance plan and schedule for the AOP renewal which will be effective in 2007. No change is required.
52	8/10/06	Mr. Dale Dyekman	Attachment 2; section 5.1.5.1	*"5.1.5.1 Near Facility Monitoring and Reporting: Comparison against 10% of the values listed in Table 2 of 40 CFR 61 Appendix E must be performed. Any analytical result that exceeds these values will be reported to the department. Notification may take the form of an e-mail. These comparisons shall be used to demonstrate that activities being conducted under various approvals are being maintained as ALARACT or BARCT."* COMMENT: Table 2 of 40 CFR 61 Appendix E is an inapplicable requirement that does not apply to the Department of Energy (DOE). Title 40 CFR 61 Appendix E Table 2 is used by NRC licensees, and non DOE federal facilities in determining compliance with 40 CFR 61 subpart I *National Emission Standards for Radionuclide Emissions From Federal Facilities Other Than Nuclear Regulatory Commission Licensees and Not*	Ecology offers the following explanation. The condition of operation contained in 5.1.5.1 Near Facility Monitoring and Reporting was negotiated between USDOE and DOH.

Comment #	Date	Source	Document Location	Comment	Response
				Covered by Subpart H. DOE Hanford is covered by subpart H, is not an NRC licensee nor a non DOE federal facility, and thus the requirement is not applicable. Existing notification requirements are already defined in WAC 246-247-080(5) and repeated in the Draft AOP Attachment 2 section 3.8. The additional notification requirements of Attachment 2 section 5.1.5.1 represent a regulatory expansion without the benefit of formal rule promulgation. Additionally, the Appendix E values as used in section 5.1.5.1 represent a technical misapplication of the original intended purpose. Appendix E concentration values have been established by definition to demonstrate full compliance with the applicable public dose standard at the location of the Maximally Exposed Individual. Stipulating a required notification at 10% of the full compliance value is arbitrary, inconsistent with the original purpose, and places unnecessary administrative regulatory burden on the permittee with minimal value added. Also, paragraph 5.1.5.1 stipulates that a notification must occur when the concentration exceeds the stated threshold at the location of environmental air samplers on the Hanford site. The Appendix E values are intended to be used at the location of the Maximally Exposed Individual located off the Hanford site, not at the sampling station location. RECOMMENDATION: Delete paragraph 5.1.5.1 in its entirety from the Hanford Site Air Operating Permit. The existing AOP Attachment 2 section 3.8 contains the applicable standard for required notifications.	
53	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 1, Entire AOP – all four sections	Please provide a sequential page numbering system for the permit or each attachment, including new page numbers after each sequential revision. Configuration control is maintained for other Hanford Permits (i.e., RCRA) and this would be the minimum configuration control needed to ensure one is looking at and has all the relevant pages of the latest revision.	Ecology offers the following explanation. The pages of each Permit component will be uniquely identified.
54	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 2, Standard Terms and General Conditions (STGC) Ecology, Page 1 of 30,	The provisions discussed for the AOP should also include "Standard Terms and General Conditions". As described in Statement of Basis page 2 of 59. Make changes as described.	Ecology Agrees. "Standard Terms and General Conditions" will be included.
55	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 3, STGC Ecology, Page 5 of 30	Table of Content section 3.0 title should be changed to "STANDARD TERMS", delete "and Conditions". Make changes as described.	Ecology Agrees.
56	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 4, STGC Ecology, Page 10 of 30	Add a bullet to the list for Non-Road Engines, as described in the statement of basis page 14 of 59. Make changes as described.	Ecology Agrees.
57	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 5, STGC Ecology, Page 11 of 30	Change title of section 3.0 to "STANDARD TERMS", delete "and Conditions". Make changes as described.	Ecology Agrees.
58	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 6, STGC Ecology, Page 18 of 30	The Annual Air Emission Inventory, second bullet, what is the requirement for emission units where there is a specific approval condition that requires tracking, as it relates to Table 1.6? Make changes as described.	Ecology Agrees. Hanford inventory has been estimated based on emission points. So the 2nd bullet is moot in enforcement and will be deleted.
59	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 7, STGC Ecology, Page 19 of 30	Based on the statement of basis the section 4.3.3 fourth sentence, should it have included ALARACTs, see page 17 of 59? Make changes as described.	Ecology offers the following explanation. As identified in Section 4.3.3 of the Statement of Basis, this reporting will not include ALARACTS.
60	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 8, STGC Ecology, Page 20 of 30	Based on the statement of basis the section 4.3.4 fourth sentence, should it have included ALARACTs, see page 18 of 59? Make changes as described.	Ecology Agrees. As ALARACTS are part of the FF-01 License, annual compliance certification will be required. The Proposed Permit will reflect this condition.
61	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 9, STGC, Section 2.0, Page 10 of 30.	The text provides examples of the facilities excluded from the AOP. One example is "all Energy Northwest facilities". WCH, under contract to DOE-RL is currently leasing a facility in the Energy Northwest complex. This facility is under the common control of	Ecology Agrees. Some portions of leased property, exemplified by the Bechtel lay down yard in the Port of Benton property and a Fluor leased

Comment #	Date	Source	Document Location	Comment	Response
				DOE. Therefore, the "all" is not entirely accurate. This facility has been discussed with Doug Hendrickson of Ecology. It is suggested that the word "all" be deleted from this list.	warehouse space at Energy Northwest would indeed become subject to this AOP should they require permitting. At present these operations are subject to general conditions of WAC 173-400 (example fugitive dust control). Text to be clarified.
62	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 10, STGC, Section 4.3.2, Page 18 of 30.	The 1st bullet states: "for emission unit **composites**, as requested…" This text appears to have a typo. Should "composites" be included? Delete the word "composite".	Ecology offers the following explanation. The inventory report includes all facilities of either individual emission point or composite emission points (e.g. multiple tanks vented through common stack). No change to the AOP is required.
63	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 11, STGC, Section 4.11, Page 25.	**Revise section paragraph to read as follows**: "The Hanford Site is subject to Part 68. The 283-W Water Treatment Plant has more than a threshold quantity of a regulated substance in a process, as determined pursuant to 40 CFR 68.115."	Ecology Agrees. The Hanford Site is subject to Part 68 (Chemical Accident Prevention Provisions), and shall certify compliance with all requirements of 40 CFR 68 as part of the annual compliance certification as required by 40 CFR 70.6(c)(5). The 283-W Water Treatment Plant has more than a threshold quantity of a regulated substance (chlorine) in a process, as determined pursuant to 40 CFR 68.115; therefore, the plant is required to have a risk management plan (RMP) to prevent accidental release of chlorine (Table 1.7 in Attachment 1). [40 CFR 68.215].
64	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 12, STGC, Section 4.3.3.	Item #4 under Section 4.3.3 is intended to address reporting for minor emission units. A new sentence has been added at the bottom that addresses continuous monitoring. The text is confusing and would appear to inappropriately apply major emission unit requirements to minor emission units? The intent of this sentence is not clear. It is recommended that the last sentence of #4, Section 4.3.3 be deleted.	Ecology offers the following explanation. This item associated with continuous monitoring will be identified as a separate item in the list to clarify application independent of minor emission units.
65	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 13, STGC, Section 4.3.3, Page 19 of 30	Section 4.3.3 "Semiannual Reports" item #4 contains a final sentence that was not within the earlier AOP or its revisions. This sentence states "For all emission units with continuous monitoring, a general statement will be provided stating that required monitoring operated continuously." With respect to minor emission points it is not clear if this sentence is asking for a monitoring status of designated stacks and NOC activities or if it is simply requiring status of non-designated stacks and activities that require continuous monitoring. A potential suggested rewrite is "For all required minor emission units with required continuous monitoring, a general statement will be provided stating that the monitoring operated continuously.	Ecology offers the following explanation. See Response to Comment #64, Commenter's comment #12.
66	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 14, STGC, Section 4.5.2	The 3rd paragraph of Section 4.5.2 identifies 4 instances when notification must be given to Health within 24 hours. The four bullet items are not necessarily consistent with WAC 246-247-080(5). It is recommended that the four items in Section 4.5.2, related to 24 hour notifications be deleted and the last sentence of the 3rd paragraph also be deleted. It would seem more appropriate to put guidance concerning the 24 hour notification requirement in the Statement of Basis after further discussion between DOE, WDOH and the site contractors.	Ecology offers the following explanation. Conditions for notification in the Proposed Permit have been clarified for consistency with WAC 246-247-080(5).
67	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 15, STGC, Section 5.1	Please verify the addition of 40 CFR 80, "Regulation of Fuels and Fuel Additives" to the inapplicable requirements table. Confirm inapplicability of mobile refueler and retailers definitions.	Ecology offers the following explanation. Section 5.2, Table 5.1. 40 CFR 80 is applicable to the Hanford Site because fuel retailer activities exist on site. No change to the AOP is required.
68	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 16, STGC, Section 5.3	Statement of Basis section and paragraph Change number of section to 6.0, as it is not part of the permit shield section pursuant to WAC 173-401-640.	Ecology Agrees.
69	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 17, STGC, SOB, Section 2.0.	The text states that Energy Northwest is a commercial producer of electrical power. It does not supply any direct DOE related services, and is not under the "common control" of DOE. It is recommended that text be added to this section to address the situation where DOE/RL contractors are located on Energy Northwest facilities. Add the following sentence to the end of the discussion concerning Energy Northwest Facilities. "Facilities leased from Energy Northwest, by DOE/RL contractors supporting DOE/RL work, would be considered to be under the common control of DOE."	Ecology offers the following explanation. Ecology has reviewed permit applicability of all the onsite and offsite support facilities during this renewal. Present text includes considerations provided by the commenter.
70	8/10/06	U.S. Department of	Comment 18, STGC, SOB, Section	The text states that For all approvals, License activities… that are closed… and the	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office	4.3.3	applicable AOP modification is submitted to the agency under Section 4.12 the permittee is not required to report. However, if the unit was closed during the reporting period, it would need to be included in the semi-annual report. It is recommended that the text be modified as suggested below: For all approvals, License activities, and emission units that are closed **prior to the reporting period**, and considered irrelevant and the applicable AOP modification is submitted to the agency under Section 4.12 the permittee is not required to report.	
71	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 19, STGC, SOB, Section 4.3.4.	The text states that For all approvals, License activites… that are closed… and the applicable AOP modification is submitted to the agency under Section 4.12 the permittee is not required to include in the annual compliance certification. However, the permit section 4.3.4 states that if the unit was closed prior to January 1 of the reporting period it will not have to be included in the annual report. These statements are contradictory. Modify the SOB Section 4.3.4 to reflect the language from the permit that states units closed prior to January 1 of the reporting period will not be included in the annual certification.	Ecology Agrees.
72	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 20, STGC, SOB, Section 4.12	The text states that an approval or license activity that is closed pursuant to the agency's regulations is considered irrelevant. It is unclear what these regulations are. It is recommended that the regulations for closing an approval or license be included here in the Statement of Basis.	Ecology offers the following explanation. Regulatory citations are required to be present in the issued permit and are provided in the Standand Terms and General Conditions.
73	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 21, STGC, SOB, Section 4.13	The 1st sentence is confusing as written. The following rewrite is suggested for the 1st sentence of SOB Section 4.14. "Section 4.13 on Monitoring and Associated Recordkeeping for Emission Units without Continuous Operation identifies that the permittee is not required to conduct monitoring and associated recordkeeping for emission units that do not operate continuously and are temporarily or permanently shut down. If the emission unit did not operate at any time between required monitoring events (e.g., if the monitoring requires continuous sampling or recording pressure drop daily, such readings would not be required on any full day in which the emission unit did not operate. The information required to be recorded when the emission unit is not operational is described.	Ecology offers the following explanation. Section 4.13 on Monitoring and Associated Recordkeeping for Emission Units without Continuous Operation identifies that the permittee is not required to conduct monitoring and associated recordkeeping for emission units that do not operate continuously and are temporarily or permanently shut down. For example, if the monitoring requires continuous sampling or recording pressure drop daily, such readings would not be required on any full day in which the emission unit did not operate. The information required to be reported when the emission unit is not operational is described. No change to the AOP is required.
74	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 22a, STGC, SOB, Section 5.2.	2nd sentence of the 2nd paragraph. I believe that the document number for the application is DOE/RL-95-07, not "97-07". Could this be a typo? Modify the 2nd sentence of the 2nd paragraph to read as follows: "The Hanford Site AOP Application (DOE/RL-95-07) and Section 1.1 of the Statement of Basis for Attachment 1 contains a list of IEUs."	Ecology offers the following explanation. The test correctly reflects DOE/RL-95-07.
75	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 22b, STGC, SOB, Section 5.2.	2ND sentence of the 2nd paragraph. For a listing of the IEUs the text should also reference the Attachment 1 Statement of Basis, Section 1.1. Modify the 2nd sentence of the 2nd paragraph to read as follows: "The Hanford Site AOP Application (DOE/RL-95-07) and Section 1.1 of the Statement of Basis for Attachment 1 contains a list of IEUs."	Ecology offers the following explanation. Section 1.1 of the Statement of Basis for Attachment 1 contains a list of IEUs from a supplemental report (06-ESD-0029, dated 12/20/2005) to the Hanford AOP Renewal application. The commenter was actually commenting upon section 5.1. The text of section 5.1 has been clarified.
76	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 23, STGC, SOB, Section 5 "Permit Shield," Paragraph 4	**Revise existing text, as follows:** In addition, actions taken pursuant to CERCLA, ~~after proper documentation and verification of removal and remediation activities,~~ are exempt from clean air permitting requirements. <u>There are situations where activities at a facility are being performed pursuant to the AOP that will be transitioned and/or modified for coverage under CERCLA.</u> In these situations, the facility will no longer be subject to the AOP after transition to CERCLA. There are two key considerations to satisfy in the transition process: (1) proper public notice and review, and (2) no lapse from CAA permitting requirements to onset of CERCLA activities. ~~The process to implement to CERCLA transition through application of Notice of Transition (NOT) from CAA to CERCLA is described below.~~ <u>The following describes the process for transitioning a facility that is subject to CERCLA out of the AOP.</u> **Retain first part of the existing paragraph, then incorporate the following redline/strikeout changes to better reflect**	Ecology offers the following explanation. Initial portions of the commenter's recommended text changes have not been incorporated as they do not provide any substantive improvement in the permit.

Comment #	Date	Source	Document Location	Comment	Response
				the requirements of CERCLA and the Tri-Party Agreement	
77	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 24, STGC, SOB, Section 5 "Permit Shield," Paragraph 5, 6, and bullets on page 20	**Replace existing text with the following process steps text**: "1. To initiate transition of a stationary source, emission unit and/or area of diffuse/fugitive emissions to CERCLA, DOE will prepare, as necessary, and place into the Hanford Administrative Record (AR) appropriate decision documentationa pursuant to its lead agency authority under 40 CFR 300. 2. After documentation of a decision to proceed under CERCLA has been placed in the AR, all response action activities described in the decision documentation may proceed independent of the AOP administrative process in accordance with CERCLA and 40 CFR 300, as authorized by the appropriate DOE Project Manager. 3. Concurrent with or subsequent to the decision by DOE to proceed with the aforementioned response action activities, a copy of the decision or similar notice will be provided by DOE to Ecology, which will constitute submittal of a Notice of Transition (NOT). 4. Upon receipt of the NOT, Ecology will take actions to revise the AOP to reflect the transition of the stationary source, emission unit, and/or area of diffuse/fugitive emissions to CERCLA. 5. If the facility or area will continue the potential-to-emit from activities outside the scope of the CERCLA response action, then permit coverage will continue for those activities. 6. If Ecology has questions regarding the scope of CERCLA response action activities, Ecology may request clarification from DOE. 7. Emission units and/or area sources for which CERCLA decision documentation has been placed in the AR are no longer subject to AOP-driven certification and/or inspection requirements. Footnote a: This process only addresses situations where activities at a facility being performed pursuant to the Clean Air Act, as administratively implemented by the AOP, will be transitioned and/or modified for coverage under CERCLA. This process does not address removal site evaluations at facilities that are not currently performing activities subject to AOP coverage. For the purposes of the **process described** above, decision documentation means any document that is used to authorize work under CERCLA authority. Decision documentation includes, but is not limited to, action memorandums and records of decision, as well as site-specific sampling or investigative work plans. Decision documentation will identify the scope of activities to be performed and will identify or provide reference to plans or procedures for ARAR compliance." **Replace existing paragraph 5, 6, and the existing process step bullets with suggested text in the comment field to the left, as extracted from process steps previously submitted on April 19, 2006 in a letter from DOE to Ecology (06-ESD-0089, "Hanford Site Air Operating Permit Renewal Additional Information Supplement Response").**	Ecology offers the following explanation. Ecology acknowledges the good faith efforts of USDOE to assure that appropriate actions and good management of the transition process proceed. However, the process outlined by the commenter provides no basis for public notice and review of the significant modifications entailed with the removal of facilities from the Air Operating Permit. The process detailed in this SOB will provide the public an opportunity to review the proposed actions at a time where decisions may be clarified, expanded, or altered; the process described in the AOP will be retained.
78	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 25, STGC, SOB, Page 12	**All Energy Northwest Facilities bullet**: Add sentence to the end, "This category includes Bonneville Power Administration (BPA)."	Ecology offers the following explanation. The Bonneville Power Administration does not have any facilities or sources to consider in this permit.
79	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 26, STGC, SOB, Page 5 of 59	Table of Content, delete or replace Appendix B and C since the obsolete lists are found in the WDOH statement of Basis for Attachment 2. Replace with Ecology NOC approval and revision process for NOC applications and approvals, and WDOH NOC application, approvals and license revision process. Make changes as described.	Ecology offers the following explanation. Appendices B and C, as drafted, will be removed and the drafted Appendix D advanced to become Appendix B. The drafted Appendix B and Appendix C information resides within the Statement of Basis for Attachment 2 to the AOP.
80	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 27, STGC, SOB, Page 12 of 59	Change acronym listed under the Areva bullet from “USDOE” to “DOE” for consistency. Make changes as described.	Ecology Agrees. The permit documents will be prepared to the greatest consistency possible with regard to clarity to the public.
81	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 28a, STGC, SOB, Page 14 of 59	Change acronym listed under the Bulk Vitrification bullet from “USDOE” to “DOE” for consistency. Make changes as described.	Ecology Agrees. See response to comment #80.
82	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 28b, STGC, SOB, Page 14 of 59	Under the same bullet first sentence add the word “of” between …approval **of** a method…” Make changes as described.	Ecology Agrees.
83	8/10/06	U.S. Department of	Comment 29, STGC, SOB, Page 17 of	Section 4.1 last paragraph, add back into the paragraph the requirement for Ecology to	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office	59	submit an application that details the information required to meet the term "complete application" as it applies to retain operations and the permit shield following the expiration of the next new AOP. "Ecology will send to the permittee the application no later than 6 to18 months prior to the expiration date. WAC 173-401-710(1). The application should also be coordinated with BCAA and WDOH." Make changes as described.	Ecology will send to the permittee the renewal application notice no later than 12 months prior to the expiration date. WAC 173-401-710(1). The application will also be coordinated with BCAA and WDOH. Text has been clarified.
84	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 30, STGC, SOB, Page 20 of 59	First bullet, add a space on the second sentence between the word "This document…." Make changes as described.	Ecology Agrees.
85	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 31, STGC, SOB, Page 20 of 59	Third bullet, add a space on the first sentence between the word "…as an…." Make changes as described.	Ecology Agrees.
86	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 32, STGC, SOB, Page 21 of 59	Second paragraph, the paragraph describes the categories of a NOC approval, however over the years Ecology has changed the format and categories of their NOC approvals, for this section to work Ecology would have to standardize the NOC approvals and the categories and write thus section to match this new format and categories. In addition, Ecology should integrate this with the new NOC approval/application revision process requested to be written for one of the appendix to this statement of basis Make changes as described.	Ecology offers the following explanation. The AOP is not intended to impose requirements for NOC process (WAC 173-400). The statement here is general enough for Table 1.6 and change to the AOP is required.
87	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 33, STGC, SOB, Page 26 of 59	Sixth row from the top, "Actions" column, change "ib/hour" to "lb/hour". Make changes as described.	Ecology Agrees.
88	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 34, STGC, SOB, Page 26 of 59	Eleventh row from the top, "Actions" column, change "etection" to "detection". Make changes as described.	Ecology Agrees.
89	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 35, STGC, SOB, Page 26-32 of 59	The two tables need to be combined in Word as a single table and delete any duplications. Make changes as described.	Ecology Agrees.
90	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 36, STGC, SOB, Page 33-34 of 59	Delete or replace with Ecology NOC application/approval revision process. Make changes as described.	Ecology offers the following explanation. The Health Obsolete NOC Approvals or Licenses are in the Department of Health Statement of Basis. The referenced appendix will be deleted. Again, no NOC process will be added in the AOP.
91	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 37, STGC, SOB, Page 35-36 of 59	Delete or replace with WDOH NOC application/approval and license revision process. Make changes as described.	Ecology offers the following explanation. See 90, responding to commenter's comment #36.
92	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 38, STGC, SOB, Page 40 of 59	Under Method, last bullet add space between "review (EPA-approved)" and delete "("from "720(1)(e)". Make changes as described.	Ecology Agrees.
93	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 39, STGC, SOB, Page 49 of 59	Need to replace {examples to be developed at a later date.} with actual examples of what a Minor Mod is to be filed for. Make changes as described.	Ecology offers the following explanation. Two examples will be included. Examples will include Tank 241-106-C sluicing modification in 2002 and NOC Amendment 1 of the WTP in 2003.
94	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 40, STGC, SOB, Pg 50 of 59	Minor Permit Modification Process: The 1st paragraph on page 50 of 59 has an incorrect statement. Change the text to read as follows: "In addition, the permittee must comply with both the applicable requirements governing the changed and the proposed terms and conditions until the agency takes final action."	Ecology Agrees.
95	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 41, STGC,SOB, Appendix D, Pg 43 of 59	Changes Not Requiring a Permit Revision (CNRR) Process: Item (5) in the box is missing text at the end of the sentence. Change (5) below to read "…established pursuant to RCW 70.94.152	Ecology Agrees.
96	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 42, STGC,SOB, Appendix D, Pg 44 of 59	Changes Not Requiring a Permit Revision (CNRR) Process: Paragraph that starts with "The CNRR is not used for making…". There appear to be some extra words and the text does not make sense as written. It is suggested that this paragraph be reworded for	Ecology offers the following explanation. This sentence is rewritten for clarity: "The proposed CNRR changes are not for Title I modifications [Standards of Performance for New

Comment #	Date	Source	Document Location	Comment	Response
				clarity.	Stationary Sources or Hazardous Air Pollutants, see WAC-401-200(35) for complete definition]. (WAC 173-401-722)"
97	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 43, STGC,SOB, Appendix D, Pg 45 of 59	Notification of Changes Not Requiring Permit Revision: Item (6) in the box is missing text at the end of the sentence. Change (6) below to read "…established pursuant to RCW 70.94.152.	Ecology Agrees.
98	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 44, STGC,SOB, Appendix D, Pg 46 of 59	Off-Permit Change Process: The 4th paragraph under "Method" is missing text. Modify the 1st sentence of the 4th paragraph under "Method" as follows: "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."	Ecology Agrees.
99	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 45, STGC,SOB, Appendix D, Pg 46 of 59	Off-Permit Change Process: Item #1 under responsibilities: There is an extra "or" in the text. Delete ",or" in front of the word "can". The text would read as follows: '… or new source permit application can be used or attached to the OPC as a mechanism to complete the form.	Ecology Agrees.
100	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 46, STGC, SOB, Appendix D, Pg 50 of 59	Minor Permit Modification Process: Number 6. under Responsibilities has an incorrect statement. Change the text to read as follows: "In addition, the permittee must comply with both the applicable requirements governing the changed and the proposed terms and conditions until the agency takes final action."	Ecology Agrees.
101	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 47, STGC,SOB, Appendix D, Pg 52 of 59	Group Processing of MMs: (a) Criteria is missing text. Change (a) to read as follows: "(a) Criteria. Group processing of minor permit modification may only be used for those permit modifications:"	Ecology Agrees.
102	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 48, 1, Section 1.4.1, Table 1.3	Please refer to DOE-RL Letter 06-AMRC-0261, dated June 7, 2006. Boiler Annexes 305, 306E, 3705, 3706, and 3720 have been permanently shut down. References to these boilers should be removed from Table 1.3 to be consistent with their previous removal from Attachment 1, Section 1.2, Table 1.1. Remove reference to Boiler Annexes 305, 306E, 3705, 3706, and 3720 from Attachment 1, Section 1.4.1, Table 1.3.	Ecology Agrees. The date of the letter 6/7/2006 is very close to the public comment period but reference to the boilers will be removed from Table 1.3.
103	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 49, 1, Table 1.6	Page 59, Discharge Point P-291Z001-001 NOC approval DE04NWP-001 has been amended since April. Will the new amendment be added at the conclusion of the public review?	Ecology Agrees. Amendment 1 of Order DE04NWP-001 was issued on 5/18/2006. The conditions of that Amendment will be included in the Proposed Permit.
104	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 50, 1, Table 1.6	Page 59, Discharge Point P-291Z001-001: Condition: Total Emission Limits: C. appears to be incomplete Provide complete text for C.	Ecology Agrees. The missing language is added.
105	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 51, 1, Page ATT 1-7	"300 EP-3020-07-S, 300 EP-3020-08-S, 300 EP-3020-09-S, Table 1.6 5mmBTU/hr natural gas (fuel oil backup) boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115)." This entry in Table 1.1 is for EMSL which is no longer included in the AOP. Remove entry.	Ecology Agrees.
106	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 52, 1, Page ATT 1-19	"300 EP-3020-12S, 300 EP-3020-13S" This entry in Table 1.4 is for EMSL which is no longer included in the AOP Remove entry.	Ecology Agrees.
107	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 53, 1, Page ATT 1-40	" Requirement Citation (WAC or Order Citation): DE 98NWP-003 **Condition Approval 9/1/1998**" These entries should be consistent with those shown on ATT 1-41 through 43 where they are shown as: " Requirement Citation (WAC or Order Citation): DE 98NWP-003, Amendment 1 **Condition Approval 1/19/2006**" Change the entries on ATT 1-40 to be consistent with the entries on the subsequent pages which correctly reflect that the NOC was amended on 1/19/2006.	Ecology Agrees.
108	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 54, 1, Page ATT 1-5	Section 1.1, first sentence capitalize the word Basis. Make changes as described.	Ecology Agrees.
109	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 55, 1, Page ATT 1-7	Bulk Vitrification Demonstration Facility, change 200W to 200 Area. Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
110	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 56, 1, Page ATT 1-8	For standardization add the following in front of the emission unit listed in the table 200W P-241U107-001, 200W P-241S102-001, 200W P-241-S112-001, 200E C-106 Sluicing, check with FH to determine if the same should be done to their emission units listed in the table. Make changes as described.	Ecology Agrees.
111	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 57, 1, Page ATT 1-20	Ecology should consider deleting Table 1.5 from the AOP. The same Standard Conditions are listed in Table 1.2 for the emission units listed in Table 1.5. Make changes as described.	Ecology offers the following explanation. Table 1.5 lists only 2 of the 9 general standards in Table 1.2. Deletion of this table would remove specific identification of emission units. No change to the AOP is required.
112	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 58, 1, Page ATT 1-20	If the table is not deleted change 200W P-296SY 001 (Exhauster) to 200W P-296SY 001 (Tank Exhauster). Make changes as described.	Ecology Agrees.
113	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 59, 1, Page ATT 1-21 through ATT 1-25	This section of Table 1.6 should be deleted since it duplicates Table 1.2 requirements. In some instance the requirement may be more stringent, however we believe that the more stringent requirements for visible emissions or opacity are incorrect since the emission unit cited use HEPA filters. Compliance for this type of emission unit is determined through Tier 3, maintaining abatement control technology to the standards for efficiency of 99.95%. Make changes as described.	Ecology offers the following explanation. The duplication reminds all NOC facilities of the general requirements. No change to the AOP is required.
114	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 60, 1, Page ATT 1-23	If not deleted the second condition listed on the page third sentence has an extra period at the end of the sentence. Make changes as described.	Ecology Agrees.
115	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 61, 1, Page ATT 1-29	First condition there is a formatting problem with the Test Frequency that runs through Required records. Make changes as described.	Ecology Agrees.
116	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 62, 1, Page ATT 1-53	Condition needs clarification within the Condition for "…under item (C.) below." and "…emission limits of Condition 1, above." For "…under item (C.) below." add after below "as listed in Section 4, Emission Monitoring, subparagraph B of the NOC approval order DE03NWP-001R1.". For "…emission limits of Condition 1, above." add after Condition 1 "as listed in Section 1, Total Emission Limits of the NOC approval order DE03NWP-001R1.". The font on this page needs to be standardized to the other format of this section/table. Make changes as described.	Ecology Agrees.
117	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 63, 1, Page ATT 1-54	The footnote on the bottom of the page, change the date from 3/17/2003 to 11/3/2004. Make changes as described.	Ecology Agrees.
118	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 64, 1, Page ATT 1-55	The footnote on the bottom of the page, change the date from 3/17/2003 to 11/3/2004. Make changes as described.	Ecology Agrees.
119	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 65, 1, Page ATT 1-56	Change the condition to read "Notification will be made ten (10) days prior to initiating waste retrieval operations from each tank covered by this Order." Clarified this condition was applicable to each tank waste retrieval operations. Make changes as described.	Ecology Agrees.
120	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 66, 1, Page ATT 1-56	The footnote on the bottom of the page, change the date from 3/17/2003 to 11/3/2004. Make changes as described.	Ecology Agrees.
121	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 67, 1, Page ATT 1-73	Indenting format on page needs to be standardized/fixed. Make changes as described.	Ecology Agrees.
122	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 68, 1, Page ATT 1-76	The first condition listed has a 2-month rolling summation, in the NOC approval this is also stated as 2-month however in the NOC application it clear states that this was to be a 12-month rolling summation, change 2-month to 12-month. Make changes as described.	Ecology Agrees. Typographical error sourced from NOC Order DE04NWP-002 has been corrected and a permit amendment has been issued.
123	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 69, 1, Page ATT 1-78	Second condition listed needs clarification within the Condition for "…Screening Level of Table 1." add after Table 1 "of the NOC approval order DE05NWP-001.". Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
124	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 70, 1, Page ATT 1-78	Second condition listed needs clarification within the Required Records for "…Section 1.0 of the NOC approval." add after approval "DE05NWP-001.". For "…effective date of this ORDER…." add after ORDER "DE05NWP-001.". Make changes as described.	Ecology Agrees.
125	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 71, 1, Page ATT 1-78	Correct formatting in the second condition Required Records. Make changes as described.	Ecology Agrees.
126	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 72, 1, Page ATT 1-79	Condition listed needs clarification within the Periodic Monitoring for "…Sections 3.1 and 3.2 of NOC approval, " add after NOC approval "order DE05NWP-001,". Make changes as described.	Ecology Agrees.
127	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 73, 1, Page ATT 1-79	Condition listed needs clarification within the Test Frequency for "…operation assessment under Section 3.1." add after a Section 3.1. "of NOC approval order DE05NWP-001.". Make changes as described.	Ecology Agrees.
128	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 74, 1, Page ATT 1-79	Should this condition be adjusted if the baseline assessments for single and dual trains have been completed? Make changes as described.	Ecology offers the following explanation. This condition is transferred from the NOC. The USDOE can initiate an application for NOC modification for Ecology's review and approval should they wish this altered but no change will be made to the AOP at this time.
129	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 75, 1, Page ATT 1-80	Second condition, remove the period following the word estimates in the following "…emissions estimates shall be…". Make changes as described.	Ecology Agrees.
130	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 76, 1, Page ATT 1-80	Correct formatting in the second condition Periodic Monitoring. Make changes as described.	Ecology Agrees.
131	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 77, 1, Page ATT 1-82	First condition listed needs clarification within the Condition for "…Screening Level of Table 1, above." add after Table 1, above "of the NOC approval order DE05NWP-002.". Make changes as described.	Ecology Agrees.
132	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 78, 1, Page ATT 1-82	First condition listed needs clarification within the Required Records for "…effective date of this ORDER…." add after ORDER "DE05NWP-002.". Make changes as described.	Ecology Agrees.
133	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 79, 1, Page ATT 1-82	Correct formatting in the first condition Required Records. Make changes as described.	Ecology Agrees.
134	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 80, 1, Page ATT 1-82	Correct formatting in the second condition Periodic Monitoring. Make changes as described.	Ecology Agrees.
135	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 81, 1, Page ATT 1-83	First condition correct formatting for Periodic Monitoring. Make changes as described.	Ecology Agrees.
136	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 82, 1, Page ATT 1-83	Second condition, change Condition Approval to read only 2/18/2005, delete reference to Holiday Inn, etc. Make changes as described.	Ecology Agrees.
137	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 83, 1, Page ATT 1-83	Third condition listed needs clarification within the Condition for "…effective date of this ORDER…." add after ORDER "DE05NWP-002.". For "…effective date of this ORDER…." add after ORDER "DE05NWP-002.". Make changes as described.	Ecology Agrees.
138	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 84, 1, Page ATT 1-88	Tier 3, change the one sentence to read as follows "Maintain abatement control technology as required in AOP Attachment 2, Attachment 1 (emission unit specific) and Attachment 2 (Table 2.1 Diffuse and Fugitive emission Units) of the FF-01 License. Make changes as described.	Ecology Agrees. With reorganization of the AOP Attachment 2, the referenced sub-attachments will be as Enclosures A and B. Text to clarify.
139	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 85, 1, Page ATT 1-90	Section 2.7, table, column titled, "Calculation model (3.1)" should be changed to read "Calculation Model (Statement of Basis 3.1.1)". Make changes as described.	Ecology Agrees.
140	8/10/06	U.S. Department of	Comment 86, 1, ATT 1-32	Condition Approval 6/30/2000 Condition: "A new/modified NOC will be required, if	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office		total emissions of toxic air pollutants exceed the Small Quantity Emission Rates, unless dispersion modeling demonstrates that emissions would continue to result in concentrations less than the ASILs. Results of any such modeling demonstrations/calculations will be on file at the facility and made available upon inspection. Periodic Monitoring: Analyze total emissions to determine if an ASIL will be exceeded." Delete condition. The condition was obsoleted per the administrative amendment DE00NWP-002, Revision 1, dated 6/29/06.	
141	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 87, 1, ATT 1-33	Condition Approval 6/30/2000 Condition: "An annual assessment of SWITS shall be conducted to document compliance that no monitoring and/or sampling systems are needed. This assessment will be reported annually beginning as part of the Calendar Year 1999 nonradioactive inventory of airborne emissions. Periodic Monitoring: Conduct an assessment of SWITS data and publish results" Delete condition. The condition was obsoleted per the administrative amendment DE00NWP-002, Revision 1, dated 6/29/06.	Ecology Agrees.
142	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 88, 1, Section 3.1	Emission Calculations from the original AOP, Attachment 1 appears to be missing from this draft. However the calculations are included in the Statement of Basis for Attachment 1 as Section 3.1. Include a Section 3.1 in Attachment 1, as follows: "Emission calculations for SO2 , nitrogen oxides, volatile organic compounds, ammonia, gas cylinders, chemical inventory, air concentrations, and TAPS can be found in Section 3.1 of the Statement of Basis for Attachment 1."	Ecology Agrees.
143	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 89, 1, Page ATT 1-68	Condition 1.2 under Discharge Point P-WTP-001 Required Records: Please add the word "supplied" that was omitted from the end of the sentence. Records of monthly fuel purchases and use and an annual certification, from the fuel distributor, stating the sulfur content of the fuel that was supplied.	Ecology Agrees.
144	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 90, 1, SOB, Page 10 of 34	Statement of Basis for Attachment 1, last sentence in Tier 3 paragraph, change "…Attachment 2, Tables 1.0, 1.1 or 1.2,…" to "…Attachment 2, Attachment 1 (emission unit specific)…". Make changes as described.	Ecology Agrees.
145	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 91, 1, SOB, Page 12 of 34	Correct section 2.9, remove the period after 1,000. Make changes as described.	Ecology Agrees.
146	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 92, 1, SOB, Page 13 of 34	Section 3.0, last sentence, change sentence to read as follows "These NOC approval applications should be kept as records." Make changes as described.	Ecology Agrees.
147	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 93, 1, SOB, Page 13 of 34	Section 3.1.1 first sentence "Not listed in AOP as a model being used." Should be deleted since the model is called out in section 2.7 of Attachment 1 of the AOP. Make changes as described.	Ecology Agrees.
148	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 94, 1, SOB, Page 28 of 34	Second paragraph, first sentence delete the word "and" found between "…stacks from…" . The last sentence of this paragraph should be changed to read as follows "The diffuse and fugitive package was recommended for WDOH inclusion in the AOP renewal statement of basis however WDOH used the package to generate Attachment 2 (Table 2.1 Diffuse and Fugitive) of Attachment 2 of the AOP." Make changes as described.	Ecology Agrees.
149	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 95, 2	General comment – The nomenclature is confusing for identification of the Attachments 1, 2, and 3 provided under "Attachment 2." Perhaps rename the lowest tier items to be Enclosures A, B, and C.	Ecology Agrees. These enclosures are now identified as Enclosures 1, 2, and 3.
150	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 96, 2, Attachment 1	For all portions of the Attachment 2 specific to the FF-01 license contents, please review for consistency and standardization of terminology, format and requirements among all emission units, to assure these contents and the AOP are congruent. The review should include a reevaluation for general format and consistency among all emission units identified. As mentioned in the DOE Hanford July 5 acceptance of the revised FF-01 license, the licensee/permitee remains available to provide further assistance with the requested review, through additional meetings or correspondence, to address any remaining changes or updates to the AOP Attachment 2 to assure conformance with the	Ecology Agrees. FF-01 was reviewed to assure content. The department will continue to work with USDOE to assure a quality license.

Comment #	Date	Source	Document Location	Comment	Response
				FF-01 License and its requirements.	
151	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 97, 2, Attachment 1	In the new FF-01 there is a new section for each Emission Unit Specific entry called "Emission Unit Information" that identifies stack height, stack diameter, average effluent temperature and average stack velocity. Attachment 2 of the AOP, in the FF-01 under "**The emission unit specific information**" (pg. 20 of 756) states that these parameters are used by the department to identify significant changes in operation of an emission unit and to assure consistent emission unit Operation. Listing of this information for each specific Emission Unit entry in the FF-01 appears to be, at least in part, for the agency's convenience regarding identification and printing from their database. This information has already been provided to WDOH in NOC applications and/or the annual radionuclide air emissions report, and does not have a clear regulatory basis nor any added benefit for inclusion in the license, so it should be removed. If kept in by the agency, then the page 20 of 756 entry should include a clear statement that no separate AOP compliance certification is required for this information. In a previous WDOH supplied sheet during the development of the FF-01, the data specific to the emission unit specific information is identified as follows: "*The emission unit specific information (i.e., stack height and diameter, average temperature and velocity) are parameters used by the department to identify significant changes in operation of an emission unit. The emission unit specific information contained in this license is to assure consistent emission unit operation, the actual emission parameters must be maintained by the emission unit owner/operator and reported as required by both WAC 246-247 and 40 CFR 61 Subpart H.*" Clearly the operator of an emission unit must meet these requirements in the regulations cited. One concern regards what is meant by "average" and this should be defined if kept in by the agency. In addition, there appears to be no basis as to why rated manufacturer capacity should not be used for this information instead. Exhausters from an engineering standpoint typically maintain tanks or other structures at a certain vacuum range. This range can vary greatly with each specific structure, particularly when using portable exhausters. WAC 246-247-080(3)(f) cites that a facility must report annual average emission unit flow rate and total volume of air released during the calendar year. This is completed on an annual basis for the Hanford Site with a radionuclide air emissions report that is certified by the contractors, and then DOE. Further, it is clear that any significant change in the stack parameters would reflect modified activities at the emission unit, and these modifications are already assured to be identified to the agency under the General Condition sections 1.5 and 3.5 of the FF-01. The Emission Unit Information for Hanford exhaust systems should not be so specific in this license, where the intent noted above in *italics* is very subjective to each person reading that information. It is requested this information be removed from the license, or very clear operationally obtainable definitions should be provided by the Agency for those terms used within WAC 246-247-080(3)(f), as only the information requested under WAC 246-247-110(6) is required content for NOC applications.	Ecology offers the following explanation. The statement of basis will be clarified to reflect that the information and certification requirements of the annual NESHAPs report meet this certification requirement. Text to be revised as: AOP, Standard Terms and General Conditions, Section 4.3.4 Annual Compliance Verification, final paragraph: No certification shall be required for the "Emission Unit Information" included within each emission unit specific segment of the FF-01 License. Submittal of the information required in Section 4.3.1 Annual NESHAPs Report will meet all the annual compliance certification requirements of diffuse and fugitive sources in Table 2.1 and point source emission unit specific information. (i.e., height, diameter, velocity, temperature, and operational status) of the FF-01 License. This means the "Emission Unit Information" listed in each emission unit specific segment of the FF-01 License (i.e., Stack Height, Stack Diameter, Average Stack Effluent Temperature, and Average Stack Exhaust Velocity) will not require separate certification.
152	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 98, 2, FF-01, Section 4.0.	Section 4.0 discusses minor/point sources of emissions. This is confusing. It is suggested that the text be changed to read “minor point sources”.	Ecology Agrees.
153	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 99, 2, FF-01, Emission Unit Specific License	Plutonium Finishing Plant emission units, 291-Z-1, 296-Z-5, 296-Z-6, 296-Z-7, concrete containers and 200 Area Diffuse/ Fugitive have been issued a newer NOC approval (AIR 06-603, NOC ID: 644). Will the new NOC approval be added at the conclusion of the public review?	Ecology offers the following explanation. NOC 644 was accepted after the FF01 was accepted on July 5, 2006. NOC 644 will be replaced with NOC 655 in the new FF01 and 709 will be obsoleted.
154	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 100, 2, FF-01, Emission Unit Specific License	The monitoring and testing requirements for minor stacks reference Section 4.1 of the standard conditions (e.g., page 360, emission unit 389). There are no subsections in section 4.0 Change the reference to 4.0 (applies to all minor emission units)	Ecology Agrees. The text now states "...section 4.0 of the Standard Conditions."
155	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 101, 2, FF-01, EU_ID 175	For the 318 Building, EUID 175 the action under Condition 2, Paragraph 2 to install a single stage HEPA filter into the exhaust flow duct in Room 126 has been completed. Recommend removing this paragraph from the permit.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
156	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 102, 2, General Conditions – WDOH, Page 13	Memorandum of Understanding Between Ecology and WDOH, DOH Contract #N1256 does not match the footer number of #N14256 on **pages 13 – 19**. Make changes as described.	Ecology offers the following explanation. Information on original document was a typographical error. The contract number in the footer (#N14256) is the correct identifier. No change will be made.
157	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 103, 2, General Conditions – WDOH, Page 20	Under the section titled "Interpretation of the Regulations and Definitions", 2nd paragraph, 2nd sentence; change "applicable" to "applicability". Make changes as described.	Ecology Agrees.
158	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 104, 2, General Conditions – WDOH, Page 58	Under the section titled "5.1 Diffuse and Fugitive Sources at Hanford", 1st paragraph, 2nd sentence, remove the ";" after "monitored;" and replace with a ",". Make changes as described.	Ecology Agrees.
159	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 105, 2, Page 1 of 4 for EU_ID 50, Page 1 of 6 for EU_ID 58, Page 1 of 6 for EU_ID 455, Page 1 of 1 for EU 712, Page 1 of 1 for EU_ID 716, Page 1 of 1 for EU_ID 717, Page 1 of 4 for EU_ID 740, Page 1of 4 for EU_ID 887	Abatement Technology, BARCT WAC 246-247-040(3), delete the reference ", 040(4)". Standardization within the permit for applying the correct requirements for the abatement technology. For EU ID 455 and 712 change the ALARACT and citation to "BARCT WAC 246-247-040(3)." Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
160	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 106, 2, Page 1 of 1 for EU_ID 53Page 1 of 1 for EU_ID 64, Page 1 of 1 for EU_ID 156, Page 1 of 1 for EU_ID 205, Page 1 of 1 for EU_ID 217, Page 1 of 1 for EU_ID 218, Page 1 of 1 for EU_ID 228, Page 1 of 1 for EU_ID 438	New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
161	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 107, 2, Page 7 of 7 for EU_ID 93, Page 7 of 7 for EU_ID 204, Page 13 of 14 for EU_ID 498, Page 3 of 4 for EU_ID 539, Page 3 of 4 for EU 541, Page 9 of 9 for EU_ID 713, Page 2 of 2 for EU_ID 735, Page 3 of 4 for EU_ID 738, Page 3 of 4 for EU_ID 740, Page 3 of 3 for EU_ID 742, Page 3 of 4 for EU_ID 744, Page 2 of 2 for EU_ID 855, Page 4 of 4 for EU_ID 878, Page 3 of 3 for EU_ID 912, Page 3 of 3 for EU_ID 922, Page 3 of 3 for EU_ID 959, Page3 of 9 for EU_ID 969	For each page listed there is a condition on the page that should be changed to the proposed standard condition text. "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." Make changes as described.	Ecology Agrees.
162	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108a, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	Emission Unit ID: 54 is a non-operational unit. As such a request to change as a standardization for non-operational units listed in FF-01: a. Replace "This is a Minor, Actively ventilated emission unit with "Non-Operational emission unit.", Make changes as described.	Ecology offers the following explanation. These emission units are intended to be actively ventilated emission units, that are temporarily non-operational. Therefore the overall description will remain the same. Specifics to the non-operational status will be described in the "Operation Status" section of the license.
163	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108b, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	b. In the section titled "Emission Unit information, delete all values listed for average stack effluent temperature and average stack exhaust velocity, since the emission unit is non-operational and has no effluent discharging from it. Make changes as described.[108a]	Ecology Agrees.
164	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108c, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID	c. Abatement technology should be either ALARCT or BARCT with only one applicable citation (currently correct as listed) Make changes as described.[108a]	Ecology offers the following explanation. ALARACT and BARCT statements will be left as is.

Comment #	Date	Source	Document Location	Comment	Response
			208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308		
165	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108d, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	d. Any abatement equipment listed should appear exactly the same as emission unit ID 54 for the specified emission unit listed on the pages listed. (Required number of units/Additional Description) Make changes as described.[108a]	Ecology Agrees.
166	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108e, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	e. Federal and State Regulatory delete the reference 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3), because there is no applicability for a non-operational unit. Make changes as described.[108a]	Ecology Agrees.
167	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108f, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	f. Monitoring and Testing Requirements replace “Appendix B, Method 114” with “Non-operational”, because there is no applicability for a non-operational unit. Make changes as described.[108a]	Ecology Agrees.
168	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108g, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	g. Radionuclides Requiring Measurement delete the reference to “Total Alpha and Total Beta” because there is no applicability for a non-operational unit. Make changes as described.[108a]	Ecology Agrees.
169	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108h, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	h. Sampling Frequency delete the reference to 4 week sample/year because there is no applicability for a non-operational unit. Make changes as described.[108a]	Ecology Agrees.
170	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108i, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	i. Sampling Requirements replace “Record Sample” with “Non-operational” because there is no applicability for a non-operational unit. Make changes as described.[108a]	Ecology Agrees.
171	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 108j, 2, Page 1 of 1 for EU_ID 54, Page 1 of 1 for EU_ID 145, Page 1 of 1 for EU_ID 165, Page 1 of 1 for EU_ID 166, Page 1 of 1 for EU_ID 208, Page 1 of 1 for EU_ID 213, , Page 1 of 1 for EU_ID 234, Page 1 of 1 for EU_ID 236, Page 1 of 1 for EU_ID 308	j. Operational Status replace “Operations Status” with a standard non-operational emission unit text as follows: “The emission unit is non-operational, removed from service and will not be utilized for future tank farm operations. If the emission unit is required for tank farm operations, the proper regulatory requirements and permits will be obtained prior to returning the emission unit to service. Closure is pending submittal of closure form and final inspection and approval by WDOH.” Make changes as described.[108a]	Ecology Agrees.
172	8/10/06	U.S. Department of	Comment 109, 2, Page 4 of 4 for EU_ID	· NOC ID 703: Condition 15, last sentence has been completed by CH2M HILL.;	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office	50, Page 9 of 9 for EU_ID 57, Page 6 of 6 for EU_ID 58, Page 81 of 87 for EU_ID 486, Page 14 of 14 for EU 498, Page 4 of 4 for EU 885	· NOC ID 703: Condition 15, last sentence has been completed by CH2M HILL.; · NOC ID 703: Condition 15, last sentence has been completed by CH2M HILL.; · NOC ID 713: Remove Condition 5 because it has been completed.; · If the technical justification referred to in Condition 15 was submitted and approved, delete the last sentence.; · Delete the last sentence in Condition 16 if the technical justification document was submitted and approved. Conditions listed in the order that the pages are listed i.e., the first bullet goes with the first page. Make changes as described.	Requested changes have been made except for emission units 749 and 886. WDOH has not reviewed the technical justification document for these emission units.
173	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 110a, 2, Page 1 of 1 for EU_ID 97, Page 1 of 1 for EU_ID 98, Page 1 of 1 for EU_ID 101, Page 1 of 1 for EU_ID 108, Page 1 of 1 for EU_ID 111, Page 1 of 1 for EU_ID 112, Page 1 of 1 for EU_ID 255, Page 1 of 1 for EU_ID 291, Page 1 of 1 for EU 737	· There was a request to add some "Additional Requirements" to SST Sampling Requirements during the comment review process. WDOH made a change to reflect the need to address "Additional Requirements" for SSTs with stack extensions. CH2M HILL is requesting the requirement for SST "Sampling Requirements" be added back to the emission units with the "Additional Requirements" listed below the "Sampling Requirements". The standard SST "Sampling Requirements" should read as follows: "Smear survey on the inside surface of the ducting and downstream of the HEPA filter on the outside of the screen covering the outlet vent.", while having the "Additional Requirements" for SSTs with stack extensions listed below. The change is to standardize the basic sampling requirements for SSTs, while adding the additional requirements for SSTs with stack extensions. Make changes as described.	Ecology Agrees. Requested changes have been made.
174	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 110b, 2, Page 1 of 1 for EU_ID 97, Page 1 of 1 for EU_ID 98, Page 1 of 1 for EU_ID 101, Page 1 of 1 for EU_ID 108, Page 1 of 1 for EU_ID 111, Page 1 of 1 for EU_ID 112, Page 1 of 1 for EU_ID 255, Page 1 of 1 for EU_ID 291, Page 1 of 1 for EU 737	· There is a typographical error in the first sentence of the "Additional Requirements" listed under sampling requirements, change "fo" to "of". Make changes as described.	Ecology Agrees. Requested changes have been made.
175	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 111a, 2, Page 1 of 10 for EU 447, Page 1 of 23 for EU 476	· Abatement Technology, BARCT WAC 246-247-040(3), delete the reference ", 040(4)". Standardization within the permit for applying the correct requirements for the abatement technology. For EU ID 476, change the ALARACT and citation to "BARCT WAC 246-247-040(3)." Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
176	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 111b, 2, Page 1 of 10 for EU 447, Page 1 of 23 for EU 476	· New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
177	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 112, 2, Page 1 of 1 for EU_ID 56	New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
178	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 113, 2, Page 1 of 1 for EU_ID 56	Operations Status for a standard primary exhaust should be changed to read as follows: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241-SY Tank Farm during storage, maintenance, and normal operations. **Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the applicable regulations and/or permits for the activity being performed and the emission units associated with the activity**. This emission unit operates with the "B" train (Western most unit) while the "A" train (Eastern most unit) operates in conjunction with the emission unit (296-S-25). This emission unit is operated in alternation with the "A" train when "B" train is not operational. The emission unit operates intermittently or continuously." Make changes as described.	Ecology Agrees. Changed to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
179	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 114a, 2, Page 1 of 9 for EU_ID 57	· Abatement Technology, BARCT WAC 246-247-040(3), delete the reference ", 040(4)". Standardization within the permit for applying the correct requirements for the abatement technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
180	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 114b, 2, Page 1 of 9 for EU_ID 57	· Add "collected biweekly" to the end of Sampling Requirements. Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
181	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 115, 2, Page 4 of 9 for EU_ID 57	NOC ID: 686, Condition 9 should be changed to reflect standardization of HEPA Filter testing amongst EUs and NOC conditions: "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." Make changes as described.	Ecology Agrees.
182	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 116, 2, Page 4 of 9 for EU_ID 57	NOC ID: 686, Condition 10 condition was truncated, add the following: "…depending on the mobilization effort desired." Make changes as described.	Ecology Agrees.
183	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 117, 2, Page 4 of 9 for EU_ID 57	Condition 12, typographical error, change "DOH" to "WDOH". Make changes as described.	Ecology Agrees.
184	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 118, 2, Page 6 of 9 for EU_ID 57	NOC ID: 694, Condition 7 should be listed as two separate conditions one for the trip point for the heater and the second for the HEPA filter requirement. Please add a new Condition 8 and renumber existing Condition "8" to Condition "9". Condition 7 should be changed to "The heater shall have an automatic trip set point below 200 degrees F." The new Condition 8 should read as the standard condition being used for HEPA filters testing "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." Make changes as described.	Ecology Agrees. The changes will be made, however the number of conditions will not be as requested.
185	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 119, 2, Page 6 of 9 for EU_ID 57	NOC ID: 694, existing Condition 8 should be changed to move the citation following 8(f) to follow the Condition 8 requirements. In addition this condition should be changed to read as follows: "The emission unit monitoring system shall have the following activities performed: [WAC 246-247-040(5)". The October 25, 2003 is a deadline for the initial request and testing which has been completed and the condition is now an on going requirement for the operation of the emission unit. Make changes as described.	Ecology Agrees.
186	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 120, 2, Page 3 of 6 for EU_ID 58	NOC ID: 694, Condition 8 should be listed as two separate conditions on for the trip point for the heater and the second for the HEPA filter requirement. Please add a new Condition 9 and renumber existing Condition "9" to Condition "10". Condition 8 should be changed to "The heater shall have an automatic trip set point below 200 degrees F." The new Condition 9 should read as the standard condition being used for HEPA filters testing "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." Make changes as described.	Ecology Agrees. The changes will be made, however the number of conditions will not be as requested.
187	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 121a, 2, Page 3 of 6 for EU_ID 58	· NOC ID: 694, existing Condition 9 should be changed to move the citation following 9(f) to follow the Condition 9 requirements. Make changes as described.	Ecology Agrees.
188	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 121b, 2, Page 3 of 6 for EU_ID 58	· Renumber to new Condition 10. In addition this condition should be changed to read as follows: "The emission unit monitoring system shall have the following activities performed: [WAC 246-247-040(5)". The October 25, 2003 is a deadline for the initial request and testing which has been completed and the condition is now an on going requirement for the operation of the emission unit. Make changes as described.	Ecology Agrees.
189	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 122, 2, Page 1 of 1 for EU_ID 59	New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
190	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 123, 2, Page 1 of 1 for EU_ID 59	Operations Status for a standard primary exhaust should be changed to read as follows: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241-SY Tank Farm during storage, maintenance, and normal operations. **Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the applicable regulations and/or permits for the activity being performed and the emission units associated with the activity**. This emission unit operates with the "A" train (Eastern most unit) while the "B" train (Western most unit) operates in conjunction with the emission unit (295-P-23). This emission unit is operated in alternation with the "B" train when "A" train is not operational. The emission unit operates intermittently or continuously." Make changes	Ecology Agrees. Changed to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.

Comment #	Date	Source	Document Location	Comment	Response
				as described.	
191	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 124, 2, Page 1 of 7 for EU_ID 93	For the following abatement technology component (condenser) please add the following to the Addition description; "**At common header.** Downtime to be negotiated with the department." Make changes as described.	Ecology Agrees.
192	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 125, 2, Page 1 of 7 for EU_ID 93	Change Monitoring and Testing Requirements "Appendix B, Method 114" to "40 CFR 61, Appendix B, Method 114" clarity of requirements point source emission unit. Make changes as described.	Ecology Agrees.
193	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 126, 2, Page 1 of 7 for EU_ID 93	Delete on "Pump" and associated additional description under the Abatement Technology table. Duplication Make changes as described.	Ecology offers the following explanation. For clarification the two "pumps" identified as the required abatement technology will have their names changed to "chiller pump" and "cooling water pump."
194	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 127, 2, Page 3 of 7 for EU_ID 93	NOC ID: 653, Condition 4 is the same as the standard requirement for notifying (24 hours)[WAC 246-247-080(5)] the agency of any deviations of the operations of either the emission unit or the NOC/License, as such this condition should be deleted. Make changes as described.	Ecology Agrees.
195	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 128, 2, Page 1 of 1 for EU_ID 96	Change Monitoring and Testing Requirements "Appendix B, Method 114" to "40 CFR 61, Appendix B, Method 114" clarity of requirements point source emission unit. Make changes as described.	Ecology Agrees.
196	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 129, 2, Page 1 of 1 for EU_ID 96	Operational status has a typographical error in the first sentence, change the word "use" to "used". Make changes as described.	Ecology Agrees.
197	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 130, 2, Page 1 of 1 for EU_ID 100	Change average stack exhaust velocity: 0.17 to 1.91 ft/second and 0.05 to 0.58 m/second. Make changes as described.	Ecology Agrees.
198	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 131, 2, Page 1 of 1 for EU_ID 120	Add a period to the last sentence of the Operational Status. "This emission unit is a passive breather filter that allows a SST to vent to the atmosphere under tank farm storage, maintenance, and operation. The tank stores the radioactive waste awaiting retrieval, treatment, and proper disposal under the applicable federal and state regulations and/or permits. The SST scheduled activities of waste retrieval, decommissioning, and eventual closure will be completed under applicable federal and state regulations and/or permits. Any activity other than storage, maintenance, and normal operation conducted at the tank will obtain the appropriate permits for the activity and the emission units associated with the activity as required by the regulations applicable to the activity. The emission unit is a passive breather filter and is part of the tank's ventilation system that operates continuously." Make changes as described.	Ecology Agrees.
199	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 132, 2, Page 1 of for EU_ID 128	Change Stack Diameter to 0.33 ft and 0.10 m for TX-109 B.F. which is a G-1 and the values listed, for stack diameter, are for an open face. Make changes as described.	Ecology Agrees.
200	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 133, 2, Page 1 of 3 for EU_ID 134	Delete the Monitoring and Testing Requirement Appendix B, Method 114". Make changes as described.	Ecology Agrees.
201	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 134, 2, Page 1 of 3 for EU_ID 134	Replace the third sentence of the Operational Status with the following: "This emission unit is a passive breather filter that allows a SST to vent to the atmosphere under tank farm storage, maintenance, and operation. The tank stores the radioactive waste awaiting retrieval, treatment, and proper disposal under the applicable federal and state regulations and/or permits. **The SST scheduled activities of waste retrieval, decommissioning, and eventual closure will be completed under applicable federal and state regulations and/or permits**. Any activity other than storage, maintenance, and normal operation conducted at the tank will obtain the appropriate permits for the activity and the emission units associated with the activity as required by the regulations applicable to the activity. The emission unit is a passive breather filter and is part of the tank's ventilation system that operates continuously." Make changes as described.	Ecology Agrees.
202	8/10/06	U.S. Department of	Comment 135, 2, Page 2 of 3 for EU_ID	Remove "Each HEPA filter shall be individually tested, annually, to the requirements of	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office	134	ASME N510, and shall have a minimum efficiency of 99.95%" from Condition 6 and insert as Condition 7 "Each HEPA filter shall be in-place tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." Make changes as described.	
203	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 136, 2, Page 1 of 1 for EU_ID 141	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
204	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 137, 2, Page 1 of 1 for EU_ID 141	Replace the first sentence of the Operational Status with the following: This emission unit is a building/facility exhauster that is **used** to ventilate building and facility operations such as but not limited to process vessels, contaminated rooms, cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that support tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently. Make changes as described.	Ecology Agrees.
205	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 138, 2, Page 1 of 2 for EU_ID 142	Change the Abatement Technology to "BARCT" with only "WAC 246-247-040(3)" as the citation. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
206	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 139, 2, Page 1 of 2 for EU_ID 142	Change the Monitoring and Testing Requirements to be "During campaigns: **40 CFR 61**, Method 2, appendix A Method **40 CFR 61** appendix B 61.93(b)(2)(ii) ANSI N13.1: During noncampaigns **40 CFR 61** Appendix B, Method 114 ". Make changes as described.	Ecology Agrees.
207	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 140, 2, Page 1 of 2 for EU_ID 142	Remove I-129 from the Radionuclides Requiring Measurement to be "Campaign: TOTAL ALPHA, TOTAL BETA, 137Cs, 90Sr, 239Pu, 238Pu, 241Am and each radionuclide that could contribute greater than 10% of the potential TEDE. Non-Campaign: TOTAL ALPHA, TOTAL BETA. Make changes as described.	Ecology Agrees.
208	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 141, 2, Page 1 of 1 for EU_ID 150	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
209	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 142, 2, Page 1 of 1 for EU_ID 150	Replace the last sentence of the Operational Status with the following: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241-AW Tank Farm during storage, maintenance, and normal operations. Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. **The emission unit operates intermittently or continuously."** Make changes as described.	Ecology offers the following explanation. Changed to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
210	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 143, 2, Page 1 of 1 for EU_ID 162	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
211	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 144, 2, Page 1 of 1 for EU_ID 162	Replace the first sentence of the Operational Status with the following: This emission unit is a building/facility exhauster that is **used** to ventilate building and facility operations such as but not limited to process vessels, contaminated rooms, cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that support tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
				permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently. Make changes as described.	
212	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 145, 2, Page 1 of 1 for EU_ID 163	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
213	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 146, 2, Page 1 of 1 for EU_ID 163	Replace the first sentence of the Operational Status with the following: This emission unit is a building/facility exhauster that is **used** to ventilate building and facility operations such as but not limited to process vessels, contaminated rooms, cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that support tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently. Make changes as described.	Ecology Agrees.
214	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 147, 2, Page 1 of 2 for EU_ID 174	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
215	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 148, 2, Page 1 of 2 for EU_ID 174	Replace the last three sentences of the Operational Status with the following: "This emission unit is a DST annulus exhauster used to support tank farm operations by ventilating the annuli of DSTs 241-AZ-101 and 241-AZ-102. Each train of this emission unit supports an individual tank (Train A for 241-AZ-101 and Train B for 241-AZ-102). **The tank stores radioactive waste until the waste is retrieved, treated, and properly disposed under the applicable federal and state regulations and/or permits. The annulus is the space between the inner wall and outer wall of the tank, and is used for leak detection. The emission unit operates continuously."** Make changes as described.	Ecology Agrees.
216	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 149, 2, Page 1 of 4 for EU_ID 203	Change the Abatement Technology to "BARCT" with only "WAC 246-247-040(3)" as the citation. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
217	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 150, 2, Page 1 of 4 for EU_ID 203	Replace the third sentence of the Operational Status with the following: "This emission unit is a passive breather filter that allows a SST to vent to the atmosphere under tank farm storage, maintenance, and operation. The tank stores the radioactive waste awaiting retrieval, treatment, and proper disposal under the applicable federal and state regulations and/or permits. The **SST** ~~tanks are~~ scheduled activities of waste retrieval, decommissioning, and eventual closure will be completed under applicable federal and state regulations and/or permits. Any activity other than storage, maintenance, and normal operation conducted at the tank will obtain the appropriate permits for the activity and the emission units associated with the activity as required by the regulations applicable to the activity. The emission unit is a passive breather filter and is part of the tank's ventilation system that operates continuously." Make changes as described.	Ecology Agrees.
218	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 151, 2, Page 4 of 4 for EU_ID 203	Remove "Each HEPA filter shall be individually tested, annually, to the requirements of ASME N510, and shall have a minimum efficiency of 99.95%" from Condition 8 and insert "Each HEPA filter shall be in-place tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." as a stand alone Condition 9. Make changes as described.	Ecology Agrees. The changes will be made, however the number of conditions will not be as requested.
219	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 152, 2, Page 1 of 7 for EU_ID 204	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
220	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 153, 2, Page 1 of 7 for EU_ID 204	Replace the last sentence of the Operational Status with the following: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241 AP Tank Farm during storage, maintenance, and normal operations. Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. **The emission unit operates intermittently or continuously."** Make changes as described.	Ecology offers the following explanation. Changed to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
221	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 154, 2, Page 1 of 1 for EU_ID 216	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
222	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 155, 2, Page 1 of 1 for EU_ID 216	Replace the Operational Status with the following: This emission unit is a building/facility exhauster that is use**d** to ventilate building and facility operations such as but not limited to **process vessels**, contaminated rooms, **cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that** ~~and~~ support ~~equipment for~~ tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently." Make changes as described.	Ecology Agrees.
223	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 156, 2, Page 1 of 8 for EU_ID 227	Remove the WAC 246-247-040(4) citation from the Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
224	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 157, 2, Page 1 of 8 for EU_ID 227	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
225	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 158, 2, Page 1 of 8 for EU_ID 227	Replace the last sentence of the Operational Status with the following: This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241 AN Tank Farm during storage, maintenance, and normal operations. Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. **The emission unit operates intermittently or continuously.** Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
226	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 159, 2, Page 1 of 8 for EU_ID 227	Change "This is a Major, Actively…" to "This is a Minor Activity…" Make changes as described.	Ecology Agrees.
227	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 160, 2, Page 1 of 8 for EU_ID 227	Change Federal and State Regulatory from WAC 246-247-075(2) to WAC 246-247-075(3) to reflect the change from major to minor. Make changes as described.	Ecology Agrees.
228	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 161, 2, Page 1 of 8 for EU_ID 227	Change Radionuclides Requiring Measurement to reflect the change from major to minor emission unit change "Each radionuclide that could contribute greater then 10% of the potential TEDE" to "Total Alpha Total Beta." Make changes as described.	Ecology Agrees.
229	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 162, 2, Page 1 of 8 for EU_ID 227	Change Sampling Frequency to reflect the change from minor to major emission unit change "Continuous" to "4 week sample/year." Make changes as described.	Ecology Agrees.
230	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 163, 2, Page 2 of 8 for EU 227	Per revision form dated 3/14/01, insert the following into Condition 2 of NOC ID 668: New In-Tank Equipment: Installation of up to two mixer pumps in each tank for mobilizing the settled solids. The pump will be capable of pumping waste through each of two, horizontally opposed, discharge nozzles, located approximately 18 inches above the bottom of the tank. Installation of a high-pressure spray wash system on top of each	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
				of the risers used for the mixer pumps. The spray wash system will be used for future decontamination of the mixer pumps as they are removed from the tank. Installation of one transfer pump in each tank for the transfer of waste. Installation of one closed circuit television for each tank. Installation of one thermocouple tree for each tank, as required. **Installation of caustic addition distribution lines to allow the addition of caustic.** Make changes as described.	
231	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 164, 2, Page 3 of 8 for EU 227	Per revision form dated 3/14/01, insert the following (bold)into Condition 2 of NOC ID 668: New pit coverblocks for AN-01A, AN-02A, AN-03A, AN-04A, AN-05A, AN-06A and AN-07A. Installation of new water and diluent piping to and from the process pits. A total of approximately 2,800 linear feet of piping will be installed at a dept of up to 5 feet underground. Installation of new process jumpers inside existing central pits (AN01A, AN02A, AN03A, AN04A, AN05A, AN06A and AN07A) and the 241-AN-A/B Valve Pits. Installation of miscellaneous concrete pads for electrical and mechanical equipment. Installation of chain-link fencing and gates. **Operation of Existing In-tank Equipment. Operation of existing transfer pumps, slurry distributors, and other in-tank equipment for the purpose of adding and mixing caustic to ensure wastes meet tank specifications. Make changes as described.**	Ecology Agrees.
232	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 165, 2, Page 1 of 2 for EU_ID 254	Remove ALARACT from the Abatement Technology and replace with BARCT. Make changes as described.	Ecology Agrees.
233	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 166, 2, Page 1 of 2 for EU_ID 254	Remove the WAC 246-247-040(4) citation from the Abatement Technology and replace with WAC 246-247-040(3). Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
234	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 167, 2, Page 1 of 2 for EU_ID 254	Add the last sentence to the Operational Status: "This emission unit is a laboratory building/facility exhauster that is used to ventilate building and facility operations such as but not limited to contaminated rooms, hot cells, glove boxes, and hoods, that support tank farm waste characterization activities, research and development, environmental sample analysis, and Hanford operations and remediation projects. The exhauster can be used to support current surveillance, maintenance activities, operations, decontamination, and cleanup activities within the building/facility. **The emission unit is a laboratory building/facility exhauster ventilation system that operates continuously**." Make changes as described.	Ecology Agrees.
235	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 168, 2, Page 2 of 2 for EU_ID 254	Revise the allowable percentage of particulate matter requirement for HEPA filters in the following description in Condition 2: "Emissions from the hot cell will be exhausted through the existing stack at the 222-S Facility (registered stack number 296-S-21). Approximately 1200 cubic feet per minute will be emitted from the hot cell. Prior to being emitted to the atmosphere, the hot cell exhaust shall pass through two sets of existing High-Efficiency Particulate Air (HEPA) Filters (double HEPAs at both the 222-SC and 222-SB Facilities), in addition to one of the three new single-stage HEPA filters adjoining the hot cell. HEPA Filters are tested in place to ensure that they remove at least ~~99.5~~**99.95** percent of particles ranging in size from 0.1 micron to 3.0 microns, with a mean particle size of 0.5 micron." Make changes as described.	Ecology Agrees.
236	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 169, 2, Page 1 of 1 for EU_ID 259	Change the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m; – Stack Diameter: 0.13 ft 0.04 m; – Average Stack Effluent Temp: 55 degrees F; – 13 degrees C; – Average Stack Velocity; 0.25 ft/second; – 0.08 m/second Make changes as described.	Ecology Agrees.
237	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 170, 2, Page 1 of 1 for EU_ID 265	Remove "See additional requirements below." from the Sampling Requirements and replace with "Smear survey on the inside surface of the ducting and downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent". This is not a stack extension tank. Make changes as described.	Ecology Agrees.
238	8/10/06	U.S. Department of Energy, Richland	Comment 171, 2, Page 1 of 1 for EU_ID 265	Replace the Additional Requirements with the following "Additional monitoring or sampling requirements established by this License will be listed in the Conditions and	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office		Limitations section, if applicable." This is not a stack extension tank. Make changes as described.	
239	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 172, 2, Page 1 of 1 for EU_ID 293	Insert a "1" for the Required Number of Units. Make changes as described.	Ecology Agrees.
240	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 173, 2, Page 1 of 1 for EU_ID 337	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.
241	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 174, 2, Page 1 of 1 for EU_ID 337	Add the last sentence to the Operational Status. "This emission unit is a waste handling building/facility exhauster that is used to ventilate building and facility operations such as but not limited to liquid waste tanks that support tank farm waste characterization activities, research and development, environmental sample analysis, and Hanford operation and remediation projects. **The emission unit operates continuously**." Make changes as described.	Ecology Agrees.
242	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 175, 2, Page 14 of 23 for EU_ID 476	NOC ID 685: Replace the first sentence of the ninth general control in Condition 2 with the following: 9. The 1,000 cfm exhauster shall be equipped with a two-stage HEPA filter, which meets the requirements of ASME **AG-1**, Section FC and shall be tested annually to requirements of ASME AG-1. The HEPA filters shall have an efficiency of 99.95 percent for 0.3-micron median diameter. Each filter housing shall meet the applicable sections of ASME N509 and the test requirement of ASME N510. The exhaust stack houses a Generic Effluent Monitoring System (GEMS) that contains an air velocity probe and the air sampling probe. Make changes as described.	Ecology Agrees.
243	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 176, 2, Page 18 of 23 for EU_ID 476	NOC ID 702: Change the total abated emission limit to 3.32 E+00 mrem/year to the MEI and the total PTE to 3.32 E+00. AIR 05-406 increased the PTE. Make changes as described.	Ecology Agrees.
244	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 177, 2, Page 20 of 23 for EU_ID 476	NOC ID 702: Condition 5, 2nd sentence, change the total abated and unabated limit back to 0.1 mrem/year for use of the guzzler as stated in AIR 05-406, which was the previous approval for this project prior to the re-issuance of the FF-01. Make changes as described.	Ecology Agrees.
245	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 178, 2, Page 23 of 23 for EU_ID 476	NOC ID 714: Replace Condition 5 with the following: "Use of the Guzzler shall comply with all Conditions and Limitations identified in the latest approval or revision of NOC ID 647, Guzzler Excavation and Backfilling Activities in Support of the 200 East Area A Farm Complex." Make changes as described.	Ecology offers the following explanation. Will make the change as requested, excluding the NOC ID number.
246	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 179, 2, Page 1 of 4 for EU_ID 477	Change "This is a MINOR, ACTIVELY ventilated emission unit." to "This is a MINOR, FUGITIVE, non-point source emission unit." Make changes as described.	Ecology Agrees.
247	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 180, 2, Page 1 of 4 for EU_ID 477	Remove the WAC 246-247-040(4) citation from the Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
248	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 181, 2, Page 1 of 4 for EU_ID 477	Add to the existing Additional Requirements "See Section 5 of the general conditions in this license for additional information." Make changes as described.	Ecology Agrees.
249	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 182, 2, Page 1 of 87 for EU_ID 486	Remove the duplicated "200" from the AEI. Make changes as described.	Ecology Agrees.
250	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 183, 2, Page 1 of 87 for EU_ID 486	Remove the WAC 246-247-040(4) citation from the Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
251	8/10/06	U.S. Department of Energy, Richland	Comment 184, 2, Page 1 of 87 for EU_ID 486	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114". Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office			
252	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 185, 2, Page 14 of 87 for EU_ID 486	Remove Condition 6. WDOH verbally approved the APQ tracking methodology employed by the field and the tracking requirement is captured by Condition 8 and the WAC 246-247 General Conditions and Limitations. Make changes as described.	Ecology Agrees.
253	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 186, 2, Page 14 of 87 for EU_ID 486	Remove Condition 14 from NOC ID: 673 under emission unit 200 Area Diffuse/Fugitive (EU ID: 486). The condition is specific to Hanford Sitewide type-1, type-2, type-3 emission unit (EU ID: 447) and is listed as Condition 11 under NOC ID: 673 on Page 6 of 10 for EU ID 447 Make changes as described.	Ecology Agrees.
254	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 187, 2, Page 26 of 87 for EU_ID 486	NOC ID 685: Replace the first sentence of the ninth general control in Condition 2 with the following: 9. The 1,000 cfm exhauster shall be equipped with a two-stage HEPA filter, which meets the requirements of ASME **AG-1**, Section FC and shall be tested annually to requirements of ASME AG-1. The HEPA filters shall have an efficiency of 99.95 percent for 0.3-micron median diameter. Each filter housing shall meet the applicable sections of ASME N509 and the test requirement of ASME N510. The exhaust stack houses a Generic Effluent Monitoring System (GEMS) that contains an air velocity probe and the air sampling probe. Make changes as described.	Ecology Agrees.
255	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 188, 2, Page 27 of 87 for EU_ID 486	NOC ID 685: Remove Condition 8, because it is covered by the requirements of Condition 9. Make changes as described.	Ecology Agrees.
256	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 189, 2, Page 49 of 87 for EU 486	NOC ID 698: Per revision form dated 9/24/03, insert the following (bold) into Condition 2 of NOC ID 698: Diffuse and Fugitive: a. Proposed Actions for Tanks C-201 through C-204: ~~i. Removal of weather covers and debris from jet pump pits and ventilation hatchways (ALARACTs 1, 4, 6, 12, 13, 14, and 15),~~ **i Remove the thermocouple trees from the top of the pump pit (no pit access is necessary) using ALARACTs 13, 14, and 15.; k. Access pump pit to remove pump in C-204 (no removal of sluice eductors will be performed) (using ALARACTs 1, 4, 6, 13, 14, 15) and general access may be needed for the other pump pits and have been calculated in a pit access potential-to-emit.; l. Remove the breather filters and reinstall with an inlet filter on each tank.; m. Lift the ventilation hatchway cover (condenser pit hatchway) which is ¼-inch steel thickness and may be potentially attached to an old fiberglass filter assembly (using ALARACTs 1, 4, 6, 13, 14, and 15 as guidance for contamination levels and controls) which will be with drawn in a large sleeve (fully enclosed) from the pit, lifted, pig-tailed and sealed. The filter will not be exposed to the environment while lifting. The filter will then be placed in a mixed waste disposal box and will not be left out in the environment. Smearable contamination levels on the outside of the bag will not exceed 50,000 dpm beta/gamma and 20 dpm alpha.;** ii. Remove condenser pit filter assembly and replace tank breather filter with a Y-duct assembly (ALARACTs 1, 4, 12, 15, and 16); iii. Remove liquid level reels and thermocouple trees, 1 each per tank (ALARACTs 1, 4, 6, 12, 13, 14, and 15); iv. Remove sluice eductor pump from Tank C-204, if necessary (ALARACTs 1, 4, 6, 12, 13, 14, and 15); b. Tank Equipment Installations: i. AMS with connected hydraulic power pack, one per tank (ALARACTs 1, 4, 6, 12, 13, and 14); ~~ii. Ventiliation inlet filter assembly, one per tank (ALARACTs 1, 4, 12, 13 and 16);~~ **ii Install ventilation inlet filter assembly to existing inlet filter on each tank (using ALARACTs 13 and 16).; · Remove the ventilation hatchway (condenser pit) cover with the presumed attached fiberglass filter using a crane and lifting hook and placed immediately into a mixed waste disposal box. ALARACT 13 controls will be used for contamination guidance and controls (less than 50,000 dpm beta/gamma and 20 dpm alpha).; · The asbestos gasket for the ventilation hatchway (condenser pit) if present will be removed using fixative while a bag is in place over the ventilation hatchway (condenser pit). The plastic will be slowly removed to minimize hatchway access while concurrently a new ventilation hatchway cover (condenser pit) will be slid onto the pit access next to the plastic and rebolted to the pit. ALARACT 13 controls will be used for**	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
				contamination guidance and controls (less than 50,000 dpm beta/gamma and 20 dpm alpha). The ventilation hatchway will have a connection so that the 296-P-48 exhauster will be connected to when active retrieval occurs.; · A single set of return and suction lines shall be placed at each tank to the central skid vacuum vessel during retrieval. After each tank is retrieved a small amount of water will be flushed through the line and checked for smearable contamination and dose readings by a Health Physics Technician to ensure minimal contamination is in place in the line. A valve will be closed at the tank surface manifold box, the end of each hose wrapped in plastic, and then moved to the next tank for retrieval. Contamination remaining in the lines when moved has been accounted for by including all of the current tank contents in the total retrieval potential-to-emit calculations. Make changes as described.	
257	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 190, 2, Page 61 of 87 for EU_ID 486	NOC ID 703: Replace Condition 7 with the following: "Retrieval activities shall occur under passive ventilation only when an exhauster can not longer be operated on a single shell tank due to structural concerns. The justification for structural concerns with the single shell tank shall be documented and provided to WDOH upon request." Delete the T from Not and make the word "no". Make changes as described.	Ecology Agrees.
258	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 191a, 2, Page 1 of 14 for EU 498	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
259	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 191b, 2, Page 1 of 14 for EU 498	· Delete '-to-emit' from Radionuclides Requiring Measurement. Make changes as described.	Ecology Agrees.
260	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 191c, 2, Page 1 of 14 for EU 498	· Add 'or continuously' to the last sentence in Operational Status. Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
261	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 192a, 2, Page 1 of 4 for EU 539	· Emission Unit Information missing, fill in the blank(s) with "0.00". Make changes as described.	Ecology offers the following explanation. Emission Unit specific information will be left as is. If changes are made as requested the emission unit would have no flow.
262	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 192b, 2, Page 1 of 4 for EU 540	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
263	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 192c, 2, Page 1 of 4 for EU 541	· Add '40 CFR 61' to Monitoring and Testing Requirements and delete '(3)'. Make changes as described.	Ecology Agrees.
264	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 193a, 2, Page 1 of 4 for EU 541	· Emission Unit Information missing, fill in the blank(s) with "0.00". Make changes as described.	Ecology offers the following explanation. Emission Unit specific information will be left as is. If changes are made as requested the emission unit would have no flow.
265	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 193b, 2, Page 1 of 4 for EU 541	· Sampling Frequency should read 'After each borehole and record filter counted annually'. Make changes as described.	Ecology Agrees.
266	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 193c, 2, Page 1 of 4 for EU 541	· Sampling Requirements – Delete 'after each borehole'. Add 'Perform a non-destructive NDA of the record filter using gamma spectroscopy calibrated to Cs137 and radiological surveys'. Make changes as described.	Ecology Agrees.
267	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 193d, 2, Page 1 of 4 for EU 541	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
268	8/10/06	U.S. Department of Energy, Richland	Comment 193e, 2, Page 1 of 4 for EU 541	· Add '40 CFR 61" to Monitoring and Testing Requirements and delete '(3)'. Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office			
269	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 194a, 2, Page 1 of 9 for EU 713	· Add the following Emission Unit Information: – Stack Height: 3.00 ft 0.91 m; – Stack Diameter: 0.33 ft 0.10m; – Average Stack Effluent Temp: 55 degrees F; – 13 degrees C; – Average Stack Velocity: 1.91 ft/second; – 0.58 m/second Make changes as described.	Ecology Agrees.
270	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 194b,	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
271	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 194c,	· Add '40 CFR 61, Appendix B, Method 114,' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
272	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 195, 2, Page 1 of 9 for EU 714 thru Page 9 of 9 for EU 714	Delete the emission unit from FF-01. The emission unit was not and will not be installed under the NOC, therefore the emission unit will never exist. Make changes as described.	Ecology Agrees.
273	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 196a, 2, Page 1 of 2 for EU 735	· Change the stack velocity to 91.31 ft/sec and 27.83 m/sec. Make changes as described.	Ecology Agrees.
274	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 196b, 2, Page 1 of 2 for EU 735	· Add '40 CFR 61' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
275	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 196c, 2, Page 1 of 2 for EU 735	· Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-45. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'. Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
276	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 197a, 2, Page 1 of 2 for EU 736	· Fill in Stack Effluent temperature with "0.00". Make changes as described.	Ecology offers the following explanation. This would imply there is not temperature for the emission unit. Will include an ambient temperature.
277	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 197b, 2, Page 1 of 2 for EU 736	· Add '40 CFR 61' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
278	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 197c, 2, Page 1 of 2 for EU 736	· Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-44. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'. Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
279	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 198a, 2, Page 2 of 2 for EU 736	· NOC ID 706: Condition 4 should be changed to reflect standardization of HEPA Filter testing amongst EUs and NOC conditions: "Each HEPA filter shall be in-laced tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." Make changes as described.	Ecology Agrees.
280	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 198b, 2, Page 2 of 2 for EU 736	· Delete Condition 7 associated with Subpart H QA requirements. See Monitoring Requirements where 40 CFR 61 H is listed already. Make changes as described.	Ecology Agrees.
281	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 199a, 2, Page 1 of 4 for EU 738	· Add the following Emission Unit Information: – Stack Height: 3.00 ft 0.91 m; – Stack Diameter: 0.33 ft 0.10m; – Average Stack Effluent Temp: 55 degrees F; – 13 degrees C; – Average Stack Velocity: 1.91 ft/second; – 0.58 m/second; Make changes as described.	Ecology Agrees.
282	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 199b,	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
283	8/10/06	U.S. Department of Energy, Richland	Comment 199c,	· Add '40 CFR 61, Appendix B, Method 114' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office			
284	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 200a, 2, Page 1 of 3 for EU 742	· Add Emission Unit Information: Height: 3.0 ft, 0.91 m, Diameter: 0.33 ft, 0.10 m, Temperature: 55 deg F, 13 deg C, Velocity: 1.91 ft/s, 0.58 m/s. Make changes as described.	Ecology Agrees.
285	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 200b, 2, Page 1 of 3 for EU 742	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
286	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 200c, 2, Page 1 of 3 for EU 742	· Add '40 CFR 61, Appendix B, Method 114' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
287	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 200d, 2, Page 1 of 3 for EU 742	· Add as the last sentence under Operational Status 'The emission unit has a passive breather filter ventilation system that operates continuously'. Make changes as described.	Ecology Agrees.
288	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 201a, 2, Page 1 of 4 for EU 744	· Add Emission Unit Information: Height: 3.0 ft, 0.91 m, Diameter: 0.33 ft, 0.10 m, Temperature: 55 deg F, 13 deg C, Velocity: 1.91 ft/s, 0.58 m/s. Make changes as described.	Ecology Agrees.
289	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 201b, 2, Page 1 of 4 for EU 744	· Delete '040(4)' from Abatement Technology Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
290	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 201c, 2, Page 1 of 4 for EU 744	· Add '40 CFR 61, Appendix B, Method 114' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
291	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 202a, 2, Page 1 of 6 for EU 749	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
292	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 202b, 2, Page 1 of 6 for EU 749	• Add 'or continuously' to the last sentence in Operational Status. Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
293	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 202c, 2, Page 1 of 6 for EU 749	• Change the Radionuclides Requiring Measurement to the following: "Each radionuclides that could contribute greater than 10 percent of the potential TEDE ~~to the MEI, greater than 0.1 mrem/yr potential-to-emit TEDE to the MEI, and greater than 25 percent of the TEDE to the MEI after controls"~~ Make changes as described.	Ecology Agrees.
294	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 203, Page 2 of 6 for EU_ID 749	Per revision form dated 9/24/03, insert the following (bold) into Condition 2 of NOC ID 698: Diffuse and Fugitive: a. Proposed Actions for Tanks C-201 through C-204: ~~i. Removal of weather covers and debris from jet pump pits and ventilation hatchways (ALARACTs 1, 4, 6, 12, 13, 14, and 15),~~ **i Remove the thermocouple trees from the top of the pump pit (no pit access is necessary) using ALARACTs 13, 14, and 15.; n. Access pump pit to remove pump in C-204 (no removal of sluice eductors will be performed) (using ALARACTs 1, 4, 6, 13, 14, 15) and general access may be needed for the other pump pits and have been calculated in a pit access potential-to-emit.; o. Remove the breather filters and reinstall with an inlet filter on each tank.; p. Lift the ventilation hatchway cover (condenser pit hatchway) which is ¼-inch steel thickness and may be potentially attached to an old fiberglass filter assembly (using ALARACTs 1, 4, 6, 13, 14, and 15 as guidance for contamination levels and controls) which will be with drawn in a large sleeve (fully enclosed) from the pit, lifted, pig-tailed and sealed. The filter will not be exposed to the environment while lifting. The filter will then be placed in a mixed waste disposal box and will not be left out in the environment. Smearable contamination levels on the outside of the bag will not exceed 50,000 dpm beta/gamma and 20 dpm alpha.**; ii.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
				Remove condenser pit filter assembly and replace tank breather filter with a Y-duct assembly (ALARACTs 1, 4, 12, 15, and 16); iii. Remove liquid level reels and thermocouple trees, 1 each per tank (ALARACTs 1, 4, 6, 12, 13, 14, and 15); iv. Remove sluice eductor pump from Tank C-204, if necessary (ALARACTs 1, 4, 6, 12, 13, 14, and 15); b. Tank Equipment Installations: i. AMS with connected hydraulic power pack, one per tank (ALARACTs 1, 4, 6, 12, 13, and 14); ~~ii. Ventiliation inlet filter assembly, one per tank (ALARACTs 1, 4, 12, 13 and 16)~~; **ii Install ventilation inlet filter assembly to existing inlet filter on each tank (using ALARACTs 13 and 16).; · Remove the ventilation hatchway (condenser pit) cover with the presumed attached fiberglass filter using a crane and lifting hook and placed immediately into a mixed waste disposal box. ALARACT 13 controls will be used for contamination controls (less than 50,000 dpm beta/gamma and 20 dpm alpha).; · The asbestos gasket for the ventilation hatchway cover (cover pit) if present will be removed using fixative while a bag is in place over the ventilation hatchway (condenser pit). The plastic will be slowly removed to minimize hatchway access while concurrently a new ventilation hatchway (condenser pit) will be slid onto the pit access next to the plastic and rebolted to the pit. ALARACT 13 controls will be used for contamination guidance and controls (less than 50,000 dpm beta/gamma and 20 dpm alpha). The ventilation hatchway will have a connection so that the 296-P-48 exhauster will be connected to when active retrieval occurs. A single set of return and suction lines shall be placed at each tank to the central skid vacuum vessel during retrieval. After each tank is retrieved a small amount of water will be flushed through the line and checked for smearable contamination and dose readings by a Health Physics Technician to ensure minimal contamination is in place in the line. A valve will be closed at the tank surface manifold box, the end of each hose wrapped in plastic, and then moved to the next tank for retrieval. Contamination remaining in the lines when moved has been accounted for by including all of the current tank contents in the total retrieval potential-to-emit calculations.** Make changes as described.	
295	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 204, 2, Page 3 of 6 for EU 749	Condition 9 – Create a new Condition 13 for the 2nd sentence relating to HEPA testing and change wording to read 'Each HEPA filter shall be in-place tested annually in accordance with the requirements of ASME AG-1 and shall have a minimum efficiency of 99.95%'. Make changes as described.	Ecology Agrees. The changes will be made, however the number of conditions will not be as requested.
296	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 205a, 2, Page 1 of 3 for EU 751	· Add the following Emission Unit Information: – Average Stack Effluent Temp: 55 degrees F, 13 degrees C; – Average Stack Velocity: 1.91 ft/second, 0.58 m/second Make changes as described.	Ecology Agrees.
297	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 205b, 2, Page 1 of 3 for EU 751	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
298	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 205c, 2, Page 1 of 3 for EU 751	· Add '40 CFR 61' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
299	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 206a, 2, Page 1 of 2 for EU 855	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
300	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 206b, 2, Page 1 of 2 for EU 855	· Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-47. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'. Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently". A specific condition/limitation will identify when the emission unit must operate continuously.
301	8/10/06	U.S. Department of Energy, Richland	Comment 207a, 2, Page 1 of 2 for EU 856	· Change Abatement Technology to BARCT. Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office			integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
302	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 207b, 2, Page 1 of 2 for EU 856	· Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-46. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'. Make changes as described.	Ecology offers the following explanation. Will change to "This emission unit operates intermittently." A specific condition/limitation will identify when the emission unit must operate continuously.
303	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 208a, 2, Page 1 of 4 for EU 878	· Emission Unit Information missing, fill in the blank(s) with "0.00". Make changes as described.	Ecology offers the following explanation. Emission Unit specific information will be left as is. If changes are made as requested the emission unit would have no flow.
304	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 208b, 2, Page 1 of 4 for EU 878	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
305	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 208c, 2, Page 1 of 4 for EU 878	· Add '40 CFR 61' to Monitoring and Testing Requirements. Make changes as described.	Ecology Agrees.
306	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 209a, 2, Page 1 of 4 for EU 885	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
307	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 209b, 2, Page 1 of 4 for EU 885	· Change Radionuclides Requiring Measurement to read 'Each radionuclide that could contribute greater than 10 percent of the potential TEDE . Make changes as described.	Ecology Agrees.
308	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 210a, 2, Page 1 of 4 for EU 886	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
309	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 210b, 2, Page 1 of 4 for EU 886	· Change Radionuclides Requiring Measurement to read 'Each radionuclide that could contribute greater than 10 percent of the potential TEDE . Make changes as described.	Ecology Agrees.
310	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 211a, 2, Page 1 of 2 and 2 of 2 for EU 894	· Add the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m; – Stack Diameter: 0.13 ft 0.04 m; – Average Stack Effluent Temp: 55 degrees F; – 13 degrees C; – Average Stack Velocity: 0.25 ft/second; – 0.08 m/second Make changes as described.	Ecology Agrees.
311	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 211b, 2, Page 1 of 2 and 2 of 2 for EU 894	· Delete Condition 2 of AIR 06-624, NOC ID 659 and replace with Condition 3 of AIR 06-503, NOC ID 661. Make changes as described.	Ecology Agrees.
312	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 211c, 2, Page 1 of 2 and 2 of 2 for EU 894	· On Condition 6, two spaces need to be added to separate the last sentence from the previous sentence. Make changes as described.	Ecology Agrees.
313	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 212a, 2, Page 1 of 1 for EU_ID 910	· Remove space in the emission unit's AEI from between "200" and "E". Make changes as described.	Ecology offers the following explanation. The space is the result of data coming from two separate fields in the database and cannot be removed.
314	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 212b, 2, Page 1 of 1 for EU_ID 910	· Add the following Emission Unit Information: – Average Stack Efffluent Temp: 55 degrees F, 13 degrees C; – Average Stack Velocity: 0.00 ft/second, 0.00 m/second Make changes as described.	Ecology offers the following explanation. Will not change Average Stack Velocity, this implies no flow out of the emission unit.
315	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 213a, 2, Page 1 of 3 for EU_ID 912	· The stack temperature is not listed and should be listed as 55 degrees F and 13 degrees C. The stack velocity is incorrect. It should be 1.91 ft/sec. Make changes as described.	Ecology Agrees.
316	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 213b, 2, Page 1 of 3 for EU_ID 912	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3),

Comment #	Date	Source	Document Location	Comment	Response
					both citations will remain listed.
317	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 214a, 2, Page 1 of 3 for EU 922	· Remove the duplicated "200E" from the AEI. Make changes as described.	Ecology Agrees.
318	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 214b, 2, Page 1 of 3 for EU 922	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
319	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 214c, 2, Page 1 of 3 for EU 922	· The stack diameter is incorrect. It should be 0.33 ft and 0.10 m as this is a G-1 housing. Make changes as described.	Ecology Agrees.
320	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 215a, 2, Page 1 of 3 for EU 959	· Add to AEI Number "P-244S-002" Make changes as described.	Ecology Agrees.
321	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 215b, 2, Page 1 of 3 for EU 959	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
322	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 215c, 2, Page 1 of 3 for EU 959	· The stack diameter is incorrect. It should be 0.33 ft and 0.10 m as this is a G-1 housing. Make changes as described.	Ecology Agrees.
323	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 216a, 2, Page 1 of 3 for EU 969	· Add to AEI Number "P-244TX-002" Make changes as described.	Ecology Agrees.
324	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 216b, 2, Page 1 of 3 for EU 969	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
325	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 216c, 2, Page 1 of 3 for EU 969	· The stack diameter is incorrect. It should be 0.33 ft and 0.10 m as this is a G-1 housing. Make changes as described.	Ecology Agrees.
326	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 217a, 2, Page 1 of 2 for EU 1129	· Add to AEI Number " P-241U301B-001" Make changes as described.	Ecology Agrees.
327	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 217b, 2, Page 1 of 2 for EU 1129	· Add the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m; – Stack Diameter: 0.13 ft 0.04 m; – Average Stack Effluent Temp: 55 degrees F; – 13 degrees C; – Average Stack Velocity: 0.25 ft/second; – 0.08 m/second Make changes as described.	Ecology Agrees.
328	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 217c, 2, Page 1 of 2 for EU 1129	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
329	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 217d, 2, Page 1 of 2 for EU 1129	· Change Operational Status to read 'This emission unit is a passive breather filter that allows the catch tank to vent to the atmosphere under tank farm storage, maintenance and operations. Any activity other than waste transfer support, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a passive breather filter that operated continuously'. Make changes as described.	Ecology Agrees.
330	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 218a, 2, Page 2 of 2 for EU 1129	· APQ missing from Condition 3. The APQ is as follows: – Am-241 1.11 E-09; – Pu-239/240 1.39 E-09; – Sr-90 3.33 E-09; – U-234 3.28 E-10; – U-235 1.28 E-10; – Zn-65 7.77 E-08 Make changes as	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
				described.	
331	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 218b, 2, Page 2 of 2 for EU 1129	· Delete Condition 2 of AIR 06-624, NOC ID 659 and replace with Condition 3 of AIR 06-503, NOC ID 661. Make changes as described.	Ecology Agrees.
332	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 219a, 2, Page 1 of 2 for EU 1130	· Add to AEI Number " P-241AZ154-001" Make changes as described.	Ecology Agrees.
333	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 219b, 2, Page 1 of 2 for EU 1130	· Add the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m; – Stack Diameter: 0.13 ft 0.04 m; – Average Stack Effluent Temp: 55 degrees F; – 13 degrees C; – Average Stack Velocity: 0.25 ft/second; – 0.08 m/second Make changes as described.	Ecology Agrees.
334	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 219c, 2, Page 1 of 2 for EU 1130	· Delete '040(4)' from Abatement Technology. Make changes as described.	Ecology offers the following explanation. Since the ALARACT Standard identified in WAC 246-247-040(4) is integral to the BARCT Standard identified in WAC 246-247-040(3), both citations will remain listed.
335	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 219d, 2, Page 1 of 2 for EU 1130	· Change Operational Status to read 'This emission unit is a passive breather filter that allows the catch tank to vent to the atmosphere under tank farm storage, maintenance and operations. Any activity other than waste transfer support, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a passive breather filter that operated continuously'. Make changes as described.	Ecology Agrees.
336	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 219e, 2, Page 1 of 2 for EU 1130	· Delete Condition 2 of AIR 06-624, NOC ID 659 and replace with Condition 3 of AIR 06-503, NOC ID 661. Make changes as described.	Ecology Agrees.
337	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 220, 2, Page 2 of 2 for EU 1130	· APQ missing from Condition 3. The APQ is as follows: – Alpha-0 1.99 E-11; – Beta-0 5.30 E-10; – Gamma-0 5.07 E-10 Make changes as described.	Ecology Agrees.
338	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 221, 2, Table 2-1	Delete the page # 63 from the cover page for Table 2.1. Make changes as described.	Ecology offers the following explanation. Page number corresponds to the Table of Contents.
339	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 222a, 2, Table 2-1, Page 1	· Change the 2nd sentence in the heading to read "See Section 5.0, **General Conditions** of this license for a description of monitoring and reporting requirements." Make changes as described.	Ecology offers the following explanation. Altered second sentence to match 5.0 heading, Monitoring and Reporting of Diffuse and Fugitive Sources and Emissions.
340	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 222b, 2, Table 2-1, Page 1	· Delete 200-E-120 and 216-A-40 from Table 2.1, because they are not part of the diffuse and fugitive list submitted to WDOH as agreed upon. Make changes as described.	Ecology offers the following explanation. Information and the inspection to verify the closure of these emission units has not been completed. Upon verification of closure these will be removed from the FF-01.
341	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 223, 2, ALARACT-Global	Double space after all numbered headings. Make changes as described.	Ecology Agrees.
342	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 224, 2, Pg. 1 of 2, ALARACT_ID 1	In the 7th ¶, italicize 'Containment Selection Guide, Attachment A'. Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
343	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 225a, 2, Pg. 2 of 2, ALARACT_ID 1	· In 2.e. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
344	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 225b, 2, Pg. 2 of 2, ALARACT_ID 1	· In 3.b italicize 'Tank Farms Radiological Control Manual'. Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
345	8/10/06	U.S. Department of Energy, Richland	Comment 225c, 2, Pg. 2 of 2, ALARACT_ID 1	· In 4.c. the word "report's" should be "report(s)". Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office			
346	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 226, 2, Pg. 2 of 3; ALARACT_ID 2	In 2.d delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
347	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 227, 2, Pg. 2 of 3; ALARACT_ID 2	In 2.i italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
348	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 228, 2, Pg. 2 of 3; ALARACT_ID 2	In 3.b italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
349	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 229, 2, Pg. 3 of 3; ALARACT_ID 2	In 5.a ")" needs to be added after the word "impact". Make changes as described.	Ecology Agrees.
350	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 230, 2, Pg. 1 of 2, ALARACT_ID 3	In 2.d. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
351	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 231, 2, Pg. 2 of 2, ALARACT_ID 3	In 3.b italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
352	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 232, 2, Pg. 1 of 1, ALARACT_ID 4	In 2.b italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
353	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 233a, 2, Pg. 1 of 1, ALARACT_ID 4	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
354	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 233b, 2, Pg. 1 of 1, ALARACT_ID 4	· Delete the extra ")" at the end of 4.a. Make changes as described.	Ecology Agrees.
355	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 233c, 2, Pg. 1 of 1, ALARACT_ID 4	· Add a ")" at the end of 6.a. Make changes as described.	Ecology Agrees.
356	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 234a, 2, Pg. 1 of 2, ALARACT_ID 5	· The alpha numeric bullets restart after "d." when they should continue with "e." Re-letter section 2 "a-h, with h having the next 4 paragraphs as subparagraphs, and followed by i, and j." Make changes as described.	Ecology Agrees.
357	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 234b, 2, Pg. 1 of 2, ALARACT_ID 5	· In 2.e. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
358	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 235a, 2, Pg. 2 of 2, ALARACT_ID 5	· In 2.k. change font to bold italic (new 2.i) Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
359	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 235b, 2, Pg. 2 of 2, ALARACT_ID 5	· Change Delete 'k to i.' and 'l to j.' from last two paragraphs In 4.c. and 5. a. add a ")" to the end of the word(s). Make changes as described.	Ecology Agrees.
360	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 235c, 2, Pg. 2 of 2, ALARACT_ID 5	· In 6.a add an "s" to the word "facilitie". Make changes as described.	Ecology Agrees.
361	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 235d, 2, Pg. 2 of 2, ALARACT_ID 5	· 3.b. needs to have an "l" added to the word "manua" Make changes as described.	Ecology Agrees.
362	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 235e, 2, Pg. 2 of 2, ALARACT_ID 5	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.

Comment #	Date	Source	Document Location	Comment	Response
363	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 236, 2, Pg 1 of 3, ALARACT_ID 6	In the paragraph titled "DECONTAMINATION" the 4th sentence, which begins "The pit covers are lifted and contained…." Needs to have the alpha value changed to 70 dpm/100cm2. Make changes as described.	Ecology Agrees.
364	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 237a, 2, Pg. 2 of 3, ALARACT_ID 6	· In 2.d. the alpha value needs to be changed to 70 dpm/100cm2 Make changes as described.	Ecology Agrees.
365	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 237b, 2, Pg. 2 of 3, ALARACT_ID 6	· In 2.f. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
366	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 237c, 2, Pg. 2 of 3, ALARACT_ID 6	· In 2.h. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
367	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 237d, 2, Pg. 2 of 3, ALARACT_ID 6	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
368	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 237e, 2, Pg. 2 of 3, ALARACT_ID 6	· In 4. c. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
369	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 238a, 2, Pg. 1 of 2, ALARACT_ID 7	· In 1, second paragraph, the terminology is in question is "top hat" the same as "riser adapter" as stated in HNF-4327, Rev 3? Make changes as described.	Ecology Agrees. As stated in the ALARACT 7, a top hat is known as a riser adapter.
370	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 238b, 2, Pg. 1 of 2, ALARACT_ID 7	· In 1, italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
371	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 239a, 2, Pg. 2 of 2, ALARACT_ID 7	· In 2.e. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
372	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 239b, 2, Pg. 2 of 2, ALARACT_ID 7	· In 2.j. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
373	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 239c, 2, Pg. 2 of 2, ALARACT_ID 7	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
374	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 239d, 2, Pg. 2 of 2, ALARACT_ID 7	· In 4. c. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
375	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 240a, 2, Pg. 2 of 2, ALARACT_ID 8	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
376	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 240b, 2, Pg. 2 of 2, ALARACT_ID 8	· Change "manua" to "manual" at the end of 3. b. Make changes as described.	Ecology Agrees.
377	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 240c, 2, Pg. 2 of 2, ALARACT_ID 8	· Change "report(s" to "report(s)' at the end of 4. c. Make changes as described.	Ecology Agrees.
378	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 240d, 2, Pg. 2 of 2, ALARACT_ID 8	· In 6.a. remove one space between All and Tank Make changes as described.	Ecology Agrees.
379	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 241a, 2, Pg. 1 of 2, ALARACT_ID 10	· Change 1.C) to lower case Make changes as described.	Ecology Agrees.
380	8/10/06	U.S. Department of	Comment 241b, 2, Pg. 1 of 2,	· In 2.a. italicize 'Containment Selection Guide, Attachment A' Make changes as	Ecology offers the following explanation.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office	ALARACT_ID 10	described.	Database limitations do not allow fractional data field italicization. No change in text.
381	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 241c, 2, Pg. 1 of 2, ALARACT_ID 10	· In 2.b. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
382	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 242a, 2, Pg. 2 of 2, ALARACT_ID 10	· In 4. c. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
383	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 242b, 2, Pg. 2 of 2, ALARACT_ID 10	· 3.b. needs to have an "l" added to the word "manua" Make changes as described.	Ecology Agrees.
384	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 242c, 2, Pg. 2 of 2, ALARACT_ID 10	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
385	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 242d, 2, Pg. 2 of 2, ALARACT_ID 10	· In 2.g. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
386	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 243a, 2, Pg. 1 of 2, ALARACT_ID 11	· On 2.g. a ")" needs to be added to the end of the word Make changes as described.	Ecology Agrees.
387	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 243b, 2, Pg. 1 of 2, ALARACT_ID 11	· In 3.a. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
388	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 243c, 2, Pg. 1 of 2, ALARACT_ID 11	· On 3.c. a ")" needs to be added to the end of the word Make changes as described.	Ecology Agrees.
389	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 244a, 2, Pg. 2 of 2, ALARACT_ID 11	· On number 4 d, a ")" needs to be added to "report(s" Make changes as described.	Ecology Agrees.
390	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 244b, 2, Pg. 2 of 2, ALARACT_ID 11	· On number 6, an "s" needs to be added to the word "Facilitie". Make changes as described.	Ecology Agrees.
391	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 245a, 2, Pg. 1 of 1, ALARACT_ID 12	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
392	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 245b, 2, Pg. 1 of 1, ALARACT_ID 12	· An "l" needs to be added to the end of "Manua" on 2.a. and 3.b. Make changes as described.	Ecology Agrees.
393	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 245c, 2, Pg. 1 of 1, ALARACT_ID 12	· On 4.b. a ")" needs to be added to the end of the word. Make changes as described.	Ecology Agrees.
394	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 245d, 2, Pg. 1 of 1, ALARACT_ID 12	· In 6.a add an "s" to the word "facilitie". Make changes as described.	Ecology Agrees.
395	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 246a, 2, Pg. 1 of 2, ALARACT_ID 13	· Remove "and use of the LDUA" from the first sentence in the description and remove the apostrophe after "pumps" and replace with a "." Make changes as described.	Ecology Agrees.
396	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 246b, 2, Pg. 1 of 2, ALARACT_ID 13	· In 1., 6th ¶, italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
397	8/10/06	U.S. Department of Energy, Richland	Comment 247a, 2, Pg. 2 of 2, ALARACT_ID 13	· In 2.g add 'when >50,000 dpm/100cm2 beta/gamma and/or 70 dpm/100 cm2 alpha.' To the end of the sentence Make changes as described.	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Operations Office			
398	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 247b, 2, Pg. 2 of 2, ALARACT_ID 13	· On 2.h. the alpha limit needs to be changed to 70 dpm/100cm2. Make changes as described.	Ecology Agrees.
399	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 247c, 2, Pg. 2 of 2, ALARACT_ID 13	· On 2.j. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
400	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 247d, 2, Pg. 2 of 2, ALARACT_ID 13	· In 2.k. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
401	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 247e, 2, Pg. 2 of 2, ALARACT_ID 13	· On 3.b. italicize 'Tank Farms Radiological Control Manual' and an "l" needs to be added to the word "Manua". Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
402	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 247e, 2, Pg. 2 of 2, ALARACT_ID 13	· In 4. c. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
403	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 247f, 2, Pg. 2 of 2, ALARACT_ID 13	· In 6.a add an "s" to the word "facilitie". Make changes as described.	Ecology Agrees.
404	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 248a, 2, Pg. 1 of 3, ALARACT_ID 14	· In 1. underline 'Jumper Work' and 'Pressure Testing Lines' Make changes as described.	Ecology Agrees.
405	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 248b, 2, Pg. 1 of 3, ALARACT_ID 14	· In the description section, the paragraph starting with "Swipes of the splash guard will be taken…" needs to have the alpha value changed to 70 dpm/100cm2. Make changes as described.	Ecology Agrees.
406	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 249a, 2, Pg. 2 of 3, ALARACT_ID 14	· 2. f. needs to have the alpha value changed to 70 dpm/100cm2.; · Create a new paragraph with 'Note: The fixative…; · 2. h. needs to have the alpha value changed to 70 dpm/100cm2. Make changes as described.	Ecology Agrees.
407	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 249b, 2, Pg. 2 of 3, ALARACT_ID 14	· 2. j. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. Make changes as described.	Ecology Agrees.
408	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 249c, 2, Pg. 2 of 3, ALARACT_ID 14	· 2. k. needs to have a "t" added to the word "permi" Make changes as described.	Ecology Agrees.
409	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 249d, 2, Pg. 2 of 3, ALARACT_ID 14	· 3. b. needs to have an "l" added to the word "manua" Make changes as described.	Ecology Agrees.
410	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 249e, 2, Pg. 2 of 3, ALARACT_ID 14	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
411	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 249f, 2, Pg. 2 of 3, ALARACT_ID 14	· In 4. c. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
412	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 250a, 2, Pg. 1 of 1, ALARACT_ID 15	· In 1. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
413	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 250b, 2, Pg. 1 of 1, ALARACT_ID 15	· In 2.b. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
414	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 250c, 2, Pg. 1 of 1, ALARACT_ID 15	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology Agrees. Database limitations do not allow fractional data field italicization. No change in text.

Comment #	Date	Source	Document Location	Comment	Response
415	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 250d, 2, Pg. 1 of 1, ALARACT_ID 15	· 3. b. needs to have an "l" added to the word "manua" Make changes as described.	Ecology Agrees.
416	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 250e, 2, Pg. 1 of 1, ALARACT_ID 15	· In 4. c. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
417	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 250f, 2, Pg. 1 of 1, ALARACT_ID 15	· In 6.a add an "s" to the word "facilitie" Make changes as described.	Ecology Agrees.
418	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 251a, 2, Pg. 1 of 1, ALARACT_ID 16	· In 2.b. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology Agrees. Database limitations do not allow fractional data field italicization. No change in text.
419	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 251b, 2, Pg. 1 of 1, ALARACT_ID 16	· 2. c. needs to have a "t" added to the word "permi" Make changes as described.	Ecology Agrees.
420	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 251c, 2, Pg. 1 of 1, ALARACT_ID 16	· In 3.b. italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
421	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 251d, 2, Pg. 1 of 1, ALARACT_ID 16	· 3. b. needs to have an "l" added to the word "manua" Make changes as described.	Ecology Agrees.
422	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 251e, 2, Pg. 1 of 1, ALARACT_ID 16	· In 4. b. add a ")" to the end of the word. Make changes as described.	Ecology Agrees.
423	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 251f, 2, Pg. 1 of 1, ALARACT_ID 16	· In 6.a add an "s" to the word "facilitie". Make changes as described.	Ecology Agrees.
424	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 252a, 2, Pg. 1 of 1, ALARACT_ID 29	· In 1, italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
425	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 252b, 2, Pg. 1 of 1, ALARACT_ID 29	· In 2. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
426	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 252c, 2, Pg. 1 of 1, ALARACT_ID 29	· Change the section 2 subparagraphs to a and b to be consistent within the ALARACTs listed in the license Make changes as described.	Ecology Agrees.
427	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 252d, 2, Pg. 1 of 1, ALARACT_ID 29	· In 3, italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
428	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 253a, 2, Pg. 1 of 1, ALARACT_ID 30	· In 1, italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
429	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 253b, 2, Pg. 1 of 1, ALARACT_ID 30	· In 2. italicize 'Containment Selection Guide, Attachment A' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
430	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 253c, 2, Pg. 1 of 1, ALARACT_ID 30	· In 3, italicize 'Tank Farms Radiological Control Manual' Make changes as described.	Ecology offers the following explanation. Database limitations do not allow fractional data field italicization. No change in text.
431	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 254, 2, Page 2 of 2 for EU_ID 473	NOC_ID 662, Condition 3, PTE is stated as 6.06E-03 mrem/year. Change PTE from 6.06E-03 to 6.1E-03.	Ecology Agrees.
432	8/10/06	U.S. Department of	Comment 255, 2, Page 2 of 2 for EU_ID	NOC_ID 662, Condition 5, is incomplete. Add to the beginning of the condition "The	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office	473	radioactive isotopes identified for this emission unit represent all of the radionuclides historically present for the . . . "	
433	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 256, 2, Page 1 of 3 for EU_ID 461	NOC_ID 654, Condition 2, paragraph 7. Add after . . . generally by forklift to the assigned facility "/area. Alternatively, waste packages may be received, inspected and unloaded at the specific facility/area where the waste will be stored."	Ecology Agrees.
434	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 257, 2, Page 1 of 3 for EU_ID 439	NOC_ID 654, Condition 2, paragraph 7. Add after . . . generally by forklift to the assigned facility "/area. Alternatively, waste packages may be received, inspected and unloaded at the specific facility/area where the waste will be stored."	Ecology Agrees.
435	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 258, 2, Page 2 of 3 for EU_ID 439	NOC_ID 654, Condition 3, line 3, WAC 246-247-030(21)(e) Change "WAC 246-247-030(21)(e)" to " WAC 246-247-030(21)(e) or (a)".	Ecology offers the following explanation. Release rates calculated for this emission unit used a method that was approved under WAC 246-247-030(21)(e).
436	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 259, 2, Page 52 of 87 for EU_ID 486	NOC_ID 700, Condition 3, reference to "See condition 19" Change all instances of "See condition 19" to "See condition 18" (occurs 6 times).	Ecology Agrees.
437	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 260, 2, Page 1 of 1 for EU_ID 210	Emission Unit ID 210 (296-P-31 Stack) 209-E Building: the stack has not been shown to be a “Major” stack · Change the classification of the stack to a “Minor” stack; · change the Federal and State Regulatory reference from WAC 246-247-075(2) to WAC 246-247-075(3); · change Method 114 to Method 114(3); · change the Radionuclides Requiring Measurement to TOTAL ALPHA, TOTAL BETA; and · - change the Sampling Frequency from Continuous to 4 week sample/yr	Ecology offers the following explanation. 296-P-31 emission unit is a major emission unit and is in the process of coming into compliance.
438	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 261, 2, Page 1 of 1 for EU_ID 369	291-A-1, under Operational Status, second sentence, the parenthetical statement, “cells A through M” is misleading. Delete the parenthetical statement, “cells A through M”	Ecology Agrees.
439	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 262, 2, Page 1 of 2 for EU_ID 402	296-B-1, Condition 2, the first part of the paragraph, “Installation of exhaust ductwork, installation of air clean-up train equip, and fans, installation of a new exhaust stack, isolation & ventilation of existing filter banks, isolation of existing stack & exhaust fans, and” is not longer applicable and the condition does not include conducting S&M activities. Delete the first part of the paragraph, “Installation of exhaust ductwork, installation of air clean-up train equip, and fans, installation of a new exhaust stack, isolation & ventilation of existing filter banks, isolation of existing stack & exhaust fans, and” and change the paragraph to read “Operate the installed ventilation systems and conduct S&M activities”.	Ecology Agrees.
440	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 263, 2, Page 1 and 2 of 2 for EU_ID 404	The emission unit (Emission Unit ID 404, 296-B-2 Vent) has been closed as a point source. Please respond to the email [M. Jarvis, DOE-RL to J. Schmidt, WDOH, dtd. 8/9/2006, “Closure Information Regarding the 296-B-2 Vent (B-Plant)]. Remove the emission unit from the permit. If this is not done, several of the conditions need to be updated to reflect the current status.	Ecology Agrees.
441	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 264, 2, Page 3 and 4 of 10 for EU_ID 447, Page 4 and 5 of 6 for EU_ID 455, Page 5 and 6 of 23 for EU_ID 476, Page 9 and 10 of 87 for EU_ID 486	Roof Replacement Activities, NOC ID 670, all the sections are identical except for the PTE numbers and Condition 6. Identify what the different sections apply to. In the previous set of C&Ls, one set was for the PTRAEU, another for the guzzler, another for the HEPA Vac and one for D&F. There is no way to distinguish them for these sheets. - Suggest combining the four sections and make a condition 3a) for the PTRAEU with its PTE; 3b) for the Guzzler with its PTE; 3c) for the HEPA Vac with its PTE; and 3d) for D&F with its PTE.	Ecology Agrees. The Table of Contents will be added as a PDF searchable bookmark making it easier to find and cross reference Emission Units (EU) and Notice of Construction ID numbers (NOC IDs).
442	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 265, 2, SOB	FF-01 Change Process: Starting with the recent issued/accepted FF-01, please describe the basis process WDOH will use to maintain a living license and issue revisions either in conjunction with the AOP or in close timing (e.g., if the AOP Renewal is issued in 12/06 and effective 1/07, would WDOH's FF-01rev1 be concurrently effective to make the 5 year life match that for the AOP pursuant to WAC 173-401) Request addition of clarifying text outlining the sequencing of revision and interface of FF-01 revisions as a living license with respect to AOP revision issuances during the course of the 5 year life of the permit/license.	Ecology offers the following explanation. WDOH will issue a letter to USDOE outlining the process to be used by January 2007and include the information as an administrative amendment.
443	8/10/06	U.S. Department of	Comment 266, 2, SOB	The AOP determination key (Ecology Standard Terms and General Conditions, SOB,	Ecology offers the following explanation.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office		Appendix D) already defines a process for utilizing forms pursuant to WAC 173-401-720 thru 725. For clarification purposes in processing modification requests generated from license approvals and other environmental documentation issued by WDOH, please provide WDOH clarification for use of this key with specific FF-01 license examples. Request WDOH to provide an interface between FF-01 and STGC, Appendix D to specify example FF-01 environmental documents that trigger, for example, a Change Not Requiring Permit Revision (CNRPR) form, which are administrative amendments, and those that would trigger an off-permit change. In addition, a clarification for the general user that AOP changes, other than significant modifications, would be in effect immediately following approval and DOE acceptance	Coordination of the permittee with the regulator early in a change process is key to assuring the appropriate documents are submitted. No AOP document changes will be made at this time.
444	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 267, 2, SOB, Section 5.0	The Obsolete Date for EUID 197, 305 B Building is incorrect. Change date to 7/20/2006	Ecology Agrees.
445	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 268, 2, SOB, Section 5.0	The Obsolete Date for EUID 307, EP-3020-01-S is incorrect. Change date to 12/28/2004	Ecology Agrees.
446	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 269, 2, SOB, Section 5.0	The Obsolete Date for EUID 348, 306 W-03-V is incorrect. Change date to 12/28/2004	Ecology Agrees.
447	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 270, 2, SOB, Section 5.0	The Obsolete Date for EUID 419, EP-3720-01-S is incorrect. Change date to 7/21/2004	Ecology Agrees.
448	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 271, 2, SOB, Section 6.0	The Obsolete Date for EUID 197, 305 B Building is incorrect. Change date to 7/20/2006	Ecology Agrees.
449	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 272, 2, SOB, Section 6.0	The Obsolete Date for EUID 412, 331 Building, NOC ID 143 is incorrect. Change date to 2/14/2002	Ecology Agrees.
450	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 273, 2, SOB, Section 6.0	Under EUID 412, the NOC ID 158 is not associated with this emission unit. Delete all information associated with NOC ID 158 under EUID 412.	Ecology Agrees.
451	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 274, 2, SOB, Section 6.0	EUID 509 is missing for emission unit EP-331-02-S, 331 Building. Please add EUID 509 for the EP-331-02-S emission unit at the 331 Building to this section. It includes: NOC ID 95, Project Title: Radon Generator, Obsoleted on 12/30/2002 (Permit Number AIR 95-803) and, NOC ID 158, Project Title: Radon Generator – Location Change, Obsoleted on 12/30/2002 (Permit Number AIR 96-506)	Ecology Agrees. Created new EU ID 1180.
452	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 275, 2, SOB, Page 4 of 15	WDOH statement of basis, first paragraph second sentence, there is an extra period at the end of the sentence. Make changes as described.	Ecology Agrees.
453	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 276, 2, SOB, Page 4 of 15	Last paragraph, first sentence, the use of a three digit number has been updated now to a four digit number. Make changes as described.	Ecology Agrees.
454	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 277, 2, SOB, Page 5 of 15	Add a note just above section 4.0 ALARACT Agreements, the note should be as follows; "NOTE: The original process of generating an AEI is listed in the original AOP application, Chapter 1, General Information and is the responsibility of the permittee to maintain and assign these number to emission units." Make changes as described.	Ecology Agrees.
455	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 278, 2, SOB, Page 5 of 15	Consider the deletion of ALARACT 2, since the rotary mode core sampler exhausters emission units and NOCs have been closed. Make changes as described.	Ecology offers the following explanation. ALARACT 2 will stay active.
456	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 279, 2, SOB, Page 7 of 15	FH needs to clarify if the emission unit 560 Decontamination Trailers for the site was to listed as a obsolete emission unit, or is the emission unit still active and in use? Make changes as described.	Ecology offers the following explanation. This emission unit became obsolete in 2004. No change will be made in the AOP until USDOE requests such.

Comment #	Date	Source	Document Location	Comment	Response
457	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 280, 2, SOB, Page 7 of 15, Obsolete Emission Units	EU ID 184, RCF-2-EX. The emission unit became obsolete upon approval of the new FF-01 License. Change the obsolete date to the date FF-01 became effective	Ecology Agrees.
458	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 281, 2, SOB, Page 8 of 15, Obsolete Approvals	Approvals that were obsolete with the issuance of the new license are not listed in this section. Include approvals that become obsolete with the issuance of the new FF-01 license.	Ecology Agrees.
459	8/10/06	U.S. Department of Energy, Richland Operations Office	Comment 282, 3, SOB, Page 1 of 16	In the BCAA statement of basis the clarification of points of contacts was added as requested. In the final review it is being asked if the names of the individuals could be deleted and only the position title be used, including the deletion of the phone number and just leave it as Program Manager and Engineer of the Department of Ecology Nuclear Waste Program Office in Richland WA. Make changes as described.	Ecology Agrees.
460	8/10/06	U.S. Department of Energy, Richland Operations Office	Attachment 2	Regarding the "Operational Status" entry provided for each Specific Emission Unit in the FF-01, please remove all such entries. This information is not required content for NOC applications. The Operational Status entries may also raise questions concerning certification of compliance. Such certification would not be reasonable due to non-modification adjustments in facility operations which could routinely affect the status described. As stated by Ecology in response to the latest Annual AOP Certification Report, "Ecology and the DOH determined the licensee need not certify compliance with conditions conveying a right, are a historical summary or fact, pertaining to actions to be completed in the future, or pertaining to actions required of the agency." If the "Operational Status" is kept, then the above statement should be repeated in the AOP to clearly address these entries as not requiring certification. Remove all Operational Status entries from the FF-01 portion of the AOP.	Ecology offers the following explanation. Operational status was revised to reflect new information submitted by USDOE.
461	8/14/06	U.S. Department of Energy, Richland Operations Office	2/Page 1 of 23 for EU_ID 476	The baghouses are separate from the cyclone. The new filtered vacuum truck will have 2 baghouses with 34 bags per baghouse. Make the changes for that were forwarded as part of the license update, such as the ones discussed below. Remove the additional description regarding the cyclone separator.	Ecology Agrees.
462	8/14/06	U.S. Department of Energy, Richland Operations Office	2/Page 3 of 23 for EU_ID 476	"Guzzler" is a trademark protected name. Suggest replacing with "Guzzler™ (i.e., Filter Vacuum Truck)"	Ecology Agrees.
463	8/14/06	U.S. Department of Energy, Richland Operations Office	2/Page 3 of 23 for EU_ID 476/second condition	The language from the second condition could be improved and clarified to reflect the new Guzzler™. Suggest changing to the following: 2) This process is limited to the utilization of the Guzzler™ Vacuum Excavation System (Guzzler™) for potholing to support utility locations, soil removal/general excavations, and radiologically limited activities ~~(i.e., less than 50,000 dpm beta-gamma and less than 140 dpm alpha contamination)~~ involving roof or pit cleaning (note, radiologically limited activities means work locations where soil radiological contamination levels are not expected to exceed 50,000 dpm/probe size beta-gamma and/or 140 dpm/probe size alpha). For purposes of this notice of construction, "soil" will be defined as sand, dirt, gravel, gravel and tar mixtures and rock, or any combination of these items. Note, beta-gamma probe size is ~16.7 cm^2 and alpha probe size is ~50 cm^2. Note, the terms, "Guzzler™," and "Filtered Vacuum Truck (FVT)," may be used interchangeably. In most cases, for excavations, the excavated soil will be used for backfilling of the excavated areas. The backfilling activities will be completed manually, using shovels, or using backhoes, loaders, or packers. For cleaning activities and some excavations, the soil will either be containerized for disposal or transported to ~~the burial grounds~~ an appropriate disposal facility (e.g., LLBGs, ERDF, etc.) within the FVT ~~Guzzler~~ collection tank for noncontainerized disposal. In some cases, soil may be unloaded from the FVT and packaged at the disposal facility for containerized disposal. Only radiologically contaminated or potentially contaminated soil will be removed or excavated using the regulated FVT ~~Guzzler~~ system. All soil removed from the system will be handled as potentially contaminated, unless otherwise surveyed or analyzed. The regulated FVT	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
				~~Guzzler~~ will not be used for the decontamination of valve pits within the tank farms. The regulated FVT ~~Guzzler~~ is also excluded from areas containing ~~regulated chemical contamination and/or~~ radiological contamination above 50,000 dpm/probe size beta-gamma and/or 140 dpm/probe size alpha. Soil can be slowly dumped from the collection tank by controlling the raising and lowering speed of the tank. Soil from contaminated areas enters the unit through a ~~adjustable length, flexible~~ hose ~~connected to an eight inch porthole with an overhead boom located at the rear of the equipment~~. An air lance attachment may ~~also~~ be ~~connected to the end of the flexible hose~~ used to aid in the loosening of soil. The various cleaning and excavation activities will be completed using the FVT ~~Guzzler~~ along with shovels, picks and/or the air lance attachment to loosen the soil, and backfilling activities will be completed using backhoes, loaders, compactors with plates, and picks and shovels, as appropriate. In some cases, however, an area may be physically inaccessible for the regulated FVT ~~Guzzler~~. In those instances, the cleaning or excavation, as well as any backfilling activities will be completed using backhoes, loaders, compactors with plates, and/or picks and shovels, as appropriate.	
464	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 2/Page 3 and 4 of 23 for EU_ID 476/ third condition	The release rates could be clarified. Change the release rates to read as follows. 100 Areas Alpha- Am241 1.79E-03 gas* WAC 246-247-030(21)(a)(i); Beta/Gamma- Sr90 4.48E-02 gas* WAC 246-247-030(21)(a)(i); 200 Areas Alpha- Am241 1.79E-03 gas* WAC 246-247-030(21)(a)(i); Beta/Gamma- Sr90 4.48E-02 gas* WAC 246-247-030(21)(a)(i); 300 Area Alpha- U234 1.30E-04 gas* WAC 246-247-030(21)(a)(i); Beta/Gamma- Sr90 4.48E-02 gas* WAC 246-247-030(21)(a)(i); 400 Area Alpha- Pu239 7.26E-04 gas* WAC 246-247-030(21)(a)(i); Beta/Gamma- Sr90 1.46E-02 gas* WAC 246-247-030(21)(a)(i); *gaseous physical state assumed for purposes of conservatism relative to assigned release fraction	Ecology Agrees.
465	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 2/Page 4 of 23 for EU_ID 476/7th condition	Filtered Vacuum Truck is more descriptive. Change references to “Guzzler” to “FVT.”	Ecology Agrees.
466	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/Table 1.2	These requirements should be in the standard terms and condition section or a plant-wide section. For each emission unit, it should show how these are applicable in the individual tables – if at all. See other permits. Move table to a plant-wide section.	Ecology offers the following explanation. The description before Table 1.2 clearly stated that "The general standards in Table 1.2 are the applicable requirement, emission limit, or work practice standard unless replaced by another requirement in Tables 1.3, 1.4, 1.5, 1.6 or 1.7.” This table is to remind permittees minimum requirements for all emission units for compliance certification purposes.
467	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/Table 1.2	The periodic monitoring for fugitive emissions ins not very practical. To operate an emission unit in Attachment 1 there is usually not pre-job planning. Move table to a plant-wide sections. For individual emission units, list all applicable requirements. If the concern is that this would take to much room, general conditions could be numbered and referred to. See other permits.	Ecology offers the following explanation. “Pre-job planning to determine reasonable control measures” is an agreement between Ecology and DOE at the original AOP application. It is not acceptable to operate a facility with potential fugitive emissions without a pre-job planning. The second footnote indicates conditions no pre-job planning is required (These requirements do not apply to emissions that pass through a stack, chimney, vent, or other functionally equivalent opening.).
468	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/1.4.4	These should be in tables like table 1.5. These tables should list all applicable requirements. This would clarify things. Place into tables that list all applicable requirements. These tables should clearly indicate which requirements apply. For example, the table would list the 1000 ppm sulfur standard and not the .05 sulfur standard in the fuel or vice versa.	Ecology offers the following explanation. Table 1.6 in Section 1.4.4 is intended to list all applicable requirements for facilities or emission units with NOC approval orders. Some NOC conditions are more restrictive than general conditions.
469	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/**E-282ED 001 & E-282WD 001**	The required records for NOx are the following: 1. Monthly fuel burned (this calculation is based on fuel added to supply tank). 2. Hours of operation logged. - There is no reason for monthly fuel burned to be calculated. Because of the amount of fuel burned is not	Ecology offers the following explanation. The approval condition for NOx in NOC Order NWP-96-1 is based on an annual limitation of 350 operating hours. AOP can not change

Comment #	Date	Source	Document Location	Comment	Response
				enough to be delivered monthly, this is just a calculation. The calculation in Model 2 of the current permit just states the following: "Fuel used divided by hours logged will demonstrate the average fuel consumption rate is below manufacturer's specification." Since the amount of fuel burned is based on how much is added to the tank, and it is not added monthly, this is not as accurate as longer time periods. Also number 2 above is a calculation – not a record in the sense that it would be something that is recorded off the meter. - Suggest changing to following: Required records: 1. Calculation results for fuel consumption rate in periodic monitoring. 2. Maintain records showing all hours of operation.	NOC conditions. The USDOE may submit a NOC revision application should they wish to change this condition.
470	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/**E-282ED 001 & E-282WD 001**	The required records are too restrictive for the condition of no more than 0.05 weight percent sulfur in the fuel. We ought to be able to purchase fuel from other than a retail outlet and supply vendor documentation. Retail outlets are required to sale fuel no more than 0.05 percent sulfur and this percent will be lower in the future (see 40 CFR 80). Suggest the following: Required records: - Vendor documentation, - Certification in the annual compliance certification that the fuel was from a retail outlet (i.e., for use in motor vehicles, see 40 CFR 80), or - Fuel analysis once per year.	Ecology offers the following explanation. Please see response to Comment 469. No change to the AOP will be required.
471	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/2.7	Retail outlet are required to sale fuel no more than 0.05 percent sulfur and this percent will be lower in the future (see 40 CFR 80). Model 1 that is referred to is no longer in the permit. Suggest the following: Required records: -Vendor documentation, - Certification in the annual compliance certification that the fuel was from a retail outlet (i.e., for use in motor vehicles, see 40 CFR 80), or -Fuel analysis once per year. - - Specify where Model 1 is.	Ecology Agrees.
472	8/14/06	U.S. Department of Energy, Richland Operations Office	Att 1/Table 1.7	This table ought to be in the same format as the other emission units. Place into table like the other emission units.	Ecology offers the following explanation. This table is clear in both regulation citation and regulatory requirements. No change to the AOP is required.
473	8/14/06	U.S. Department of Energy, Richland Operations Office	Att 1/Table 1.7/283-W Water Treatment Plant (Chlorine Tank)	Most of these requirements should be in a sitewide requirements section. For example, it's not the 283-W facility that needs to evaluate for new substances – they already are in that situation – it's the rest of the site that needs to do this. 40 CFR 68 applies to stationary sources. Is Ecology implying that 283-W is it's own stationary source with its own "industrial group"? Remove the sitewide sections to a plant-wide or sitewide section.	Ecology offers the following explanation. The Hanford Site is a "major source" under Section 112 of the FCAA. A major source is defined as any source or group of stationary sources located within a contiguous area and under common control that emits more-than-threshold HAPs [WAC 173-401-200(19)(a)]. A "stationary source" means any building, structure, facility, or installation that emits or may emit any air contaminant [WAC 173-401-200(34)]. Sometimes, the CFR and State regulations apply "source" and "stationary source" interchangeably because most of the cases that a sources is a single stationary source. In any rate, the 70 CFR 68.10(a) requires an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under Section 68.115, shall comply with the requirements of Part 68. The 283-W Water Treatment Plant, the only facility (or stationary source) within the Hanford Site (a major source), qualifies for Part 68 application. The applicability has nothing to do with "industrial grouping" [although Hanford has five NAICS industrial groupings: 541710, 562210, 562910 (56---- major grouping), 924110 and 999999; and four old SIC codes as 9999, 4953, 8733, and 9511 (major grouping)]. Therefore, 283-W will remain in Table 1.7.
474	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/2.1/Tier 1	It should be clear that one can just perform a Method 9 test right away rather than doing a visible emission survey right away. Add a note stating so.	Ecology offers the following explanation. The key in Tier 1 is corrective action. The language does not prohibit performing Method 9 right away. No change in the AOP is required.
475	8/14/06	U.S. Department of Energy, Richland Operations Office	Att. 1/2.3	Fugitive emissions and fugitive dust does not really apply to specific emission unit in attachment 1. These requirements should be in a plant-wide section with compliance being demonstrated to by the complaint process. Remove this section and references to it in the individual emission units in Attachment 1.	Ecology offers the following explanation. Section 2 is for Compliance and periodic monitoring for all facilities and activities. Section 2.3 shall be applied for controlling fugitive emissions and dust. Some facilities (such as IDF) must control

Comment #	Date	Source	Document Location	Comment	Response
					fugitive emissions/dust all the time, proper NOC conditions shall be in place accordingly. Some temporary activities may only need control for a few hours, provisions of Section 2.3 shall be applied and properly recorded. No change to the AOP is required.
476	8/14/06	U.S. Department of Energy, Richland Operations Office	General/Table of contents	Organizing the AOP around the regulators does not make sense. Hanford is supposed to have one permit from Ecology. There are standard terms and conditions, facility-wide conditions, and emission unit specific conditions. Formatting the AOP in this framework seems to make more sense and appears to more like other permits issued in Washington state. At a minimum, Attachment 3 should be eliminated and those requirements should be moved to where the other facility-wide requirements are. Attachment 2 could also be eliminated, although it might make sense to separated since it is a separate license. See the WSU-Pullman permit for another example of a permit that contains a license. Because the sections are separated by regulator, the permit appears to be 3 different permits. This has allowed for inconsistencies. For example, attachment 1 has periodic monitoring for emission units, while attachment 2 does not. Reformat the permit. Eliminate periodic monitoring for Attachment 1 units.	Ecology offers the following explanation. The organization of the Hanford AOP was discussed extensively back in 1999 before the issuance of the original permit. The current setup seems to be practical and user-friendly to permittees. In reality, there are three (not counting EPA) regulators for the Hanford AOP. It is essential for the permittees to contact, apply, report and issue regulatory materials to proper regulatory bodies, especially as WAC 246-247 has some unique requirements. Combining three permits into one may cause confusion in reporting and communication. No change to the AOP is required.
477	8/14/06	U.S. Department of Energy, Richland Operations Office	AOP Renewal/Section 2	As correctly pointed out in the statement of basis, the definition of "major stationary source" talks about stationary source or groups of stationary sources that are under a <u>single major industrial grouping.</u> Describe the single industrial grouping for the major source.	Ecology offers the following explanation. Two EPA policy memos are helpful to describe "industrial grouping" and "major source" in Title V. (1) 11/16/1994 memo from John S. Seitz, Air Division Director, Office of Air Quality Planning and Standards, EPA to Lisa J. Thorvig, Manager, Air Quality Division, Minnesota Pollution Control Agency. For Title V applications, "major source" is defined under FCAA Section 112 and 40 CFR 63 as any stationary source (or group of stationary sources) located within a contiguous area and under common control that emits above a threshold level of HAP. Consequently, the industrial grouping (SIC or NAICS codes) of the sources are not considered in defining major sources. For Title I applications (NSR and PSD), the definition of major source is from 40 CFR 70.2, which requires all stationary sources located on contiguous or adjacent properties under common control and belonging to a single major industrial grouping to be considered as the same source. By this policy guidance, it is concluded that industrial grouping is only of secondary consideration in determining major source. The next policy guidance provides a real example. (2) 7/31/1998 memo from R. Douglas Neeley, Chief, Air, Radiation, and Technology Branch, EPA Region 4 to James A. Joy, III, Chief, Bureau of Air Quality Control, South Carolina Department of Health and Environmental Control. This letter is to response to BMW's request to separate two sources for Title V application. Although EPA agrees with BMW that the two stationary sources are in different major industrial groups, the stationary sources must be considered one facility for Title V permitting since the sources are one facility under common control under Section 112 of the Act. Ecology will add one paragraph to clarify and differentiate the definition for major source in Title I and Title V.
478	8/14/06	U.S. Department of Energy, Richland Operations Office	AOP Renewal/4.3.3/	This should reflect the current semiannual reports. Change second item to clarify it is only for emission units in Attachment 2 and change paragraph 5 to read, "For an emission unit(s) listed in Attachment 2…	Ecology offers the following explanation. The existing language can only be applied to Attachment 2. No change to the AOP is required.
479	8/14/06	U.S. Department of Energy, Richland Operations Office	AOP Renewal /4.13	This section is unnecessarily complicated. If a unit is permanently shut down, it is in the interest of the permittee to have it removed from the permit. Suggest eliminating a) and b) and just stating that semiannual report and/or annual compliance certification notes periods when the emission unit did not operate if relevant to compliance.	Ecology offers the following explanation. Ecology and Health require formal reporting and notice of shutdowns. This section remains unchanged.
480	8/14/06	U.S. Department of	AOP Renewal/5.1	The language in the permit shield should reflect the language in 173-401-640. Change to	Ecology Agrees.

Comment #	Date	Source	Document Location	Comment	Response
		Energy, Richland Operations Office		read as in WAC 173-401-640(1).	The language in 173-401-640(1) will be added in Section 5.1. The rest of the wording will remain because "applicable" and "inapplicable" requirements should be clarified.
481	8/10/06	U.S. Department of Energy, Richland Operations Office	Attachment 2, FF-01 License, Emission Unit ID: 443	The Monitoring and Testing Requirements references Appendix B, Method 114. Not all the requirements of Appendix B, Method 114 are applicable. Change the text to read: "Appendix B, Method 114, 3."	Ecology Agrees.

Central Files: Air/AOP
File Name:
Cross Reference: 324/327
RECEIVED
APR 24 2006
Department of Ecology
NWP - Richland

Mr. Doug Hendrickson
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

April 21, 2006

RE: Hanford Site Air Operating Permit Modification

Dear Mr. Hendrickson:

Thank you for the opportunity to provide comment on the Hanford Site Air Operating Permit (AOP). My comment is general, but global. I request that general condition 4.5 of the Hanford AOP be modified to include and address Washington Administrative Code (WAC) 173-400-040(5) standards as reporting requirements. Specifically, general condition 4.5 "Permit Deviation Reporting" should require the permittee to report emissions which are detrimental to persons or property. Specifically, general condition 4.5 should reference WAC 173-400-040(5) and require that any and all air emissions that have caused detriment to the health, safety, or welfare of any person be reported. Also, the general condition should require that any and all air emissions that have caused damage to property or business be reported.

If you have any questions or would like to discuss this comment, I may be reached by telephone at 509/627-1162.

In advance, thank you for your consideration.

Sincerely,

Alisa D. Huckaby

Alisa D. Huckaby
1524 Ridgeview Ct.
Richland, WA 99352

Copy: Todd Martin, HAB

Williams, Tanya

From: Peterson, Kirk A [Kirk_A_Peterson@RL.gov]
Sent: Thursday, August 10, 2006 2:34 PM
To: Wang, Oliver S. (ECY)
Cc: Schmidt, John W (DOH); Martell, P John (DOH); Clark, Sarah (DOH); Terry Flores; Hendrickson, Douglas; Jarvis, Mary F; Bowser, Dennis W; Aldridge, Theresa L (PNSO); Barnett, Matthew; Woodruff, Rodger K; Woolard, Joan G; Penn, Lucinda L; Kemp, Christopher J; Haggard, Robert; Weiher, Patrick A; Fritz, Lori; Engelmann, Richard H; Bates, John A; Peterson, Kirk A
Subject: COMMENTS ON HANFORD AOP 2006 RENEWAL OF #00-05-006
Attachments: AOPRenewalCommentForm_08102006fin.doc

August 10, 2006

Mr. Oliver Wang
Nuclear Waste Program
State of Washington, Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99352

Mr. Wang:

The attached comment file is provided during the 30-day public comment period for the subject "draft permit" which ends on August 11, 2006. This electronic submittal will be followed with a hand delivery of a hard copy later today. The comments are provided by the U.S. Department of Energy, Richland Operations Office (RL) and encompass comments from the U.S. Department of Energy, Office of River Protection (ORP) and U.S. Department of Energy, Pacific Northwest Site Office (PNSO) for their respective operational permittee responsibilities, listed therein.

RL would like to acknowledge the significant effort by key permit and license writers within the state agencies to streamline the very complex compilation of Clean Air Act requirements for Hanford Site facility operations into an improved renewal package.

Please advise if you have any questions on the comments provided and/or feel that subsequent meeting (s) may be beneficial to our partnership in working toward effective resolutions.

Kirk A. Peterson
Senior Environmental Engineer
FH, Environmental Protection
372-2364 (office) 521-2924 (cell)

AOP COMMENT RECORD FORM

Document Title: 2006 Air Operating Permit Renewal - "Draft Permit" Review

Reviewer:	**Company/Organization:**	
U.S. Department of Energy, Richland Operations Office U.S. Department of Energy, Office of River Protection	Department of Energy-RL P.O. Box 550 825 Jadwin Ave. Richland, WA 99352	Department of Energy-ORP P.O. Box 450 2440 Stevens Ave. Richland, WA 99352

Comment No.	Attachment& Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
1.	Entire AOP – all four sections	Please provide a sequential page numbering system for the permit or each attachment, including new page numbers after each sequential revision.	Configuration control is maintained for other Hanford Permits (i.e., RCRA) and this would be the minimum configuration control needed to ensure one is looking at and has all the relevant pages of the latest revision.	Ecology -
2.	Standard Terms and General Conditions (STGC) Ecology, Page 1 of 30,	The provisions discussed for the AOP should also include "Standard Terms and General Conditions". As described in Statement of Basis page 2 of 59.	Make changes as described.	Ecology -
3.	STGC Ecology, Page 5 of 30	Table of Content section 3.0 title should be changed to "STANDARD TERMS", delete "and Conditions".	Make changes as described.	Ecology -
4.	STGC Ecology, Page 10 of 30	Add a bullet to the list for Non-Road Engines, as described in the statement of basis page 14 of 59.	Make changes as described.	Ecology -
5.	STGC Ecology, Page 11 of 30	Change title of section 3.0 to "STANDARD TERMS", delete "and Conditions".	Make changes as described.	Ecology -
6.	STGC Ecology, Page 18 of 30	The Annual Air Emission Inventory, second bullet, what is the requirement for emission units where there is a specific approval condition that requires tracking, as it relates to Table 1.6?	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
7.	STGC Ecology, Page 19 of 30	Based on the statement of basis the section 4.3.3 fourth sentence, should it have included ALARACTs, see page 17 of 59?	Make changes as described.	Ecology -
8.	STGC Ecology, Page 20 of 30	Based on the statement of basis the section 4.3.4 fourth sentence, should it have included ALARACTs, see page 18 of 59?	Make changes as described.	Ecology -
9.	STGC, Section 2.0, Page 10 of 30.	The text provides examples of the facilities excluded from the AOP. One example is "all Energy Northwest facilities". WCH, under contract to DOE-RL is currently leasing a facility in the Energy Northwest complex. This facility is under the common control of DOE. Therefore, the "all" is not entirely accurate. This facility has been discussed with Doug Hendrickson of Ecology.	It is suggested that the word "all" be deleted from this list.	Ecology -
10.	STGC, Section 4.3.2, Page 18 of 30.	The 1st bullet states: "for emission unit **composites**, as requested…" This text appears to have a typo. Should "composites" be included?	Delete the word "composite".	Ecology -
11.	STGC, Section 4.11, Page 25.	**Revise section paragraph to read as follows:** "The Hanford Site is subject to Part 68. The 283-W Water Treatment Plant has more than a threshold quantity of a regulated substance in a process, as determined pursuant to 40 CFR 68.115."		Ecology -
12.	STGC, Section 4.3.3.	Item #4 under Section 4.3.3 is intended to address reporting for minor emission units. A new sentence has been added at the bottom that addresses continuous monitoring. The text is confusing and would appear to inappropriately apply major emission unit requirements to minor emission units?	The intent of this sentence is not clear. It is recommended that the last sentence of #4, Section 4.3.3 be deleted.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
13.	STGC, Section 4.3.3, Page 19 of 30	Section 4.3.3 "Semiannual Reports" item #4 contains a final sentence that was not within the earlier AOP or its revisions. This sentence states "For all emission units with continuous monitoring, a general statement will be provided stating that required monitoring operated continuously." With respect to minor emission points it is not clear if this sentence is asking for a monitoring status of designated stacks and NOC activities or if it is simply requiring status of non-designated stacks and activities that require continuous monitoring. A potential suggested rewrite is "For all required minor emission units with required continuous monitoring, a general statement will be provided stating that the monitoring operated continuously.		WDOH
14.	STGC, Section 4.5.2	The 3rd paragraph of Section 4.5.2 identifies 4 instances when notification must be given to Health within 24 hours. The four bullet items are not necessarily consistent with WAC 246-247-080(5).	It is recommended that the four items in Section 4.5.2, related to 24 hour notifications be deleted and the last sentence of the 3rd paragraph also be deleted. It would seem more appropriate to put guidance concerning the 24 hour notification requirement in the Statement of Basis after further discussion between DOE, WDOH and the site contractors.	WDOH -
15.	STGC, Section 5.1	Please verify the addition of 40 CFR 80, “Regulation of Fuels and Fuel Additives" to the inapplicable requirements table.	Confirm inapplicability of mobile refueler and retailers definitions.	Ecology -
16.	STGC, Section 5.3	Statement of Basis section and paragraph	Change number of section to 6.0, as it is not part of the permit shield section pursuant to WAC 173-401-640.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
17.	STGC, SOB, Section 2.0.	The text states that Energy Northwest is a commercial producer of electrical power. It does not supply any direct DOE related services, and is not under the "common control" of DOE. It is recommended that text be added to this section to address the situation where DOE/RL contractors are located on Energy Northwest facilities.	Add the following sentence to the end of the discussion concerning Energy Northwest Facilities. "Facilities leased from Energy Northwest, by DOE/RL contractors supporting DOE/RL work, would be considered to be under the common control of DOE."	Ecology -
18.	STGC, SOB, Section 4.3.3	The text states that For all approvals, License activities… that are closed… and the applicable AOP modification is submitted to the agency under Section 4.12 the permittee is not required to report. However, if the unit was closed during the reporting period, it would need to be included in the semi-annual report.	It is recommended that the text be modified as suggested below: For all approvals, License activities, and emission units that are closed **prior to the reporting period,** and considered irrelevant and the applicable AOP modification is submitted to the agency under Section 4.12 the permittee is not required to report.	Ecology -
19.	STGC, SOB, Section 4.3.4.	The text states that For all approvals, License activites… that are closed… and the applicable AOP modification is submitted to the agency under Section 4.12 the permittee is not required to include in the annual compliance certification. However, the permit section 4.3.4 states that if the unit was closed prior to January 1 of the reporting period it will not have to be included in the annual report. These statements are contradictory.	Modify the SOB Section 4.3.4 to reflect the language from the permit that states units closed prior to January 1 of the reporting period will not be included in the annual certification.	Ecology -
20.	STGC, SOB, Section 4.12	The text states that an approval or license activity that is closed pursuant to the agency's regulations is considered irrelevant. It is unclear what these regulations are.	It is recommended that the regulations for closing an approval or license be included here in the Statement of Basis.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
21.	STGC, SOB, Section 4.13	The 1st sentence is confusing as written.	The following rewrite is suggested for the 1st sentence of SOB Section 4.14. "Section 4.13 on Monitoring and Associated Recordkeeping for Emission Units without Continuous Operation identifies that the permittee is not required to conduct monitoring and associated recordkeeping for emission units that do not operate continuously and are temporarily or permanently shut down. If the emission unit did not operate at any time between required monitoring events (e.g., if the monitoring requires continuous sampling or recording pressure drop daily, such readings would not be required on any full day in which the emission unit did not operate. The information required to be recorded when the emission unit is not operational is described.	Ecology -
22.	STGC, SOB, Section 5.2.	2nd sentence of the 2nd paragraph. I believe that the document number for the application is DOE/RL-95-07, not "97-07". Could this be a typo? 2ND sentence of the 2nd paragraph. For a listing of the IEUs the text should also reference the Attachment 1 Statement of Basis, Section 1.1.	Modify the 2nd sentence of the 2nd paragraph to read as follows: "The Hanford Site AOP Application (DOE/RL-95-07) and Section 1.1 of the Statement of Basis for Attachment 1 contains a list of IEUs."	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
23.	STGC, SOB, Section 5 "Permit Shield," Paragraph 4	**Revise existing text, as follows:** In addition, actions taken pursuant to CERCLA~~, after proper documentation and verification of removal and remediation activities,~~ are exempt from clean air permitting requirements. There are situations where activities at a facility are being performed pursuant to the AOP that will be transitioned and/or modified for coverage under CERCLA. In these situations, the facility will no longer be subject to the AOP after transition to CERCLA. There are two key considerations to satisfy in the transition process: (1) proper public notice and review, and (2) no lapse from CAA permitting requirements to onset of CERCLA activities. ~~The process to implement to CERCLA transition through application of Notice of Transition (NOT) from CAA to CERCLA is described below.~~ The following describes the process for transitioning a facility that is subject to CERCLA out of the AOP.	**Retain first part of the existing paragraph, then incorporate the following redline/strikeout changes to better reflect the requirements of CERCLA and the Tri-Party Agreement**	Ecology -
24.	STGC, SOB, Section 5 "Permit Shield," Paragraph 5, 6, and bullets on page 20	**Replace existing text with the following process steps text:** "1. To initiate transition of a stationary source, emission unit and/or area of diffuse/fugitive emissions to CERCLA, DOE will prepare, as necessary, and place into the Hanford Administrative Record (AR) appropriate decision documentation[a] pursuant to its lead agency authority under 40 CFR 300. 2. After documentation of a decision to proceed under CERCLA has been placed in the AR, all response action activities described in the decision documentation may proceed independent of the AOP administrative process in accordance with CERCLA and 40 CFR 300, as authorized by	**Replace existing paragraph 5, 6, and the existing process step bullets with suggested text in the comment field to the left, as extracted from process steps previously submitted on April 19, 2006 in a letter from DOE to Ecology (06-ESD-0089, "Hanford Site Air Operating Permit Renewal Additional Information Supplement Response").**	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		the appropriate DOE Project Manager. 3. Concurrent with or subsequent to the decision by DOE to proceed with the aforementioned response action activities, a copy of the decision or similar notice will be provided by DOE to Ecology, which will constitute submittal of a Notice of Transition (NOT). 4. Upon receipt of the NOT, Ecology will take actions to revise the AOP to reflect the transition of the stationary source, emission unit, and/or area of diffuse/fugitive emissions to CERCLA. 5. If the facility or area will continue the potential-to-emit from activities outside the scope of the CERCLA response action, then permit coverage will continue for those activities. 6. If Ecology has questions regarding the scope of CERCLA response action activities, Ecology may request clarification from DOE. 7. Emission units and/or area sources for which CERCLA decision documentation has been placed in the AR are no longer subject to AOP-driven certification and/or inspection requirements. Footnote [a]: This process only addresses situations where activities at a facility being performed pursuant to the Clean Air Act, as administratively implemented by the AOP, will be transitioned and/or modified for coverage under CERCLA. This process		

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		does not address removal site evaluations at facilities that are not currently performing activities subject to AOP coverage. For the purposes of the process described above, **decision documentation** means any document that is used to authorize work under CERCLA authority. Decision documentation includes, but is not limited to, action memorandums and records of decision, as well as site-specific sampling or investigative work plans. Decision documentation will identify the scope of activities to be performed and will identify or provide reference to plans or procedures for ARAR compliance."		
25.	STGC, SOB, Page 12	**All Energy Northwest Facilities** bullet: Add sentence to the end, "This category includes Bonneville Power Administration (BPA)."		Ecology -
26.	STGC, SOB, Page 5 of 59	Table of Content, delete or replace Appendix B and C since the obsolete lists are found in the WDOH statement of Basis for Attachment 2. Replace with Ecology NOC approval and revision process for NOC applications and approvals, and WDOH NOC application, approvals and license revision process.	Make changes as described.	Ecology -
27.	STGC, SOB, Page 12 of 59	Change acronym listed under the Areva bullet from “USDOE” to “DOE” for consistency.	Make changes as described.	Ecology -
28.	STGC, SOB, Page 14 of 59	Change acronym listed under the Bulk Vitrification bullet from “USDOE” to “DOE” for consistency. Under the same bullet first sentence add the word “of” between …approval **of** a method…”	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
29.	STGC, SOB, Page 17 of 59	Section 4.1 last paragraph, add back into the paragraph the requirement for Ecology to submit an application that details the information required to meet the term “complete application” as it applies to retain operations and the permit shield following the expiration of the next new AOP. "Ecology will send to the permittee the application no later than 6 to18 months prior to the expiration date. WAC 173-401-710(1). The application should also be coordinated with BCAA and WDOH."	Make changes as described.	Ecology -
30.	STGC, SOB, Page 20 of 59	First bullet, add a space on the second sentence between the word “This document….”	Make changes as described.	Ecology -
31.	STGC, SOB, Page 20 of 59	Third bullet, add a space on the first sentence between the word “…as an….”	Make changes as described.	Ecology -
32.	STGC, SOB, Page 21 of 59	Second paragraph, the paragraph describes the categories of a NOC approval, however over the years Ecology has changed the format and categories of their NOC approvals, for this section to work Ecology would have to standardize the NOC approvals and the categories and write thus section to match this new format and categories. In addition, Ecology should integrate this with the new NOC approval/application revision process requested to be written for one of the appendix to this statement of basis	Make changes as described.	Ecology -
33.	STGC, SOB, Page 26 of 59	Sixth row from the top, “Actions” column, change “ib/hour” to “lb/hour”.	Make changes as described.	Ecology -
34.	STGC, SOB, Page 26 of 59	Eleventh row from the top, “Actions” column, change “etection” to “detection”.	Make changes as described.	Ecology -
35.	STGC, SOB, Page 26-32 of 59	The two tables need to be combined in Word as a single table and delete any duplications.	Make changes as described.	Ecology -
36.	STGC, SOB, Page 33-34 of 59	Delete or replace with Ecology NOC application/approval revision process.	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
37.	STGC, SOB, Page 35-36 of 59	Delete or replace with WDOH NOC application/approval and license revision process.	Make changes as described.	Ecology -
38.	STGC, SOB, Page 40 of 59	Under Method, last bullet add space between "review (EPA-approved)" and delete "("from "720(1)(e)".	Make changes as described.	Ecology -
39.	STGC, SOB, Page 49 of 59	Need to replace {examples to be developed at a later date.} with actual examples of what a Minor Mod is to be filed for.	Make changes as described.	Ecology -
40.	STGC, SOB, Pg 50 of 59	Minor Permit Modification Process: The 1st paragraph on page 50 of 59 has an incorrect statement.	Change the text to read as follows: "In addition, the permittee must comply with both the applicable requirements governing the changed and the proposed terms and conditions until the agency takes final action."	Ecology -
41.	STGC,SOB, Appendix D, Pg 43 of 59	Changes Not Requiring a Permit Revision (CNRR) Process: Item (5) in the box is missing text at the end of the sentence.	Change (5) below to read "…established pursuant to RCW 70.94.152	Ecology -
42.	STGC,SOB, Appendix D, Pg 44 of 59	Changes Not Requiring a Permit Revision (CNRR) Process: Paragraph that starts with "The CNRR is not used for making…". There appear to be some extra words and the text does not make sense as written.	It is suggested that this paragraph be reworded for clarity.	Ecology -
43.	STGC,SOB, Appendix D, Pg 45 of 59	Notification of Changes Not Requiring Permit Revision Item (6) in the box is missing text at the end of the sentence.	Change (6) below to read "…established pursuant to RCW 70.94.152.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
44.	STGC,SOB, Appendix D, Pg 46 of 59	Off-Permit Change Process: The 4th paragraph under "Method" is missing text.	Modify the 1st sentence of the 4th paragraph under "Method" as follows: "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."	Ecology -
45.	STGC,SOB, Appendix D, Pg 46 of 59	Off-Permit Change Process: Item #1 under responsibilities: There is an extra "or" in the text.	Delete ",or" in front of the word "can". The text would read as follows: '… or new source permit application can be used or attached to the OPC as a mechanism to complete the form. .	Ecology -
46.	STGC, SOB, Appendix D, Pg 50 of 59	Minor Permit Modification Process: Number 6. under Responsibilities has an incorrect statement.	Change the text to read as follows: "In addition, the permittee must comply with both the applicable requirements governing the changed and the proposed terms and conditions until the agency takes final action."	Ecology -
47.	STGC,SOB, Appendix D, Pg 52 of 59	Group Processing of MMs (a) Criteria is missing text.	Change (a) to read as follows: "(a) Criteria. Group processing of minor permit modification may only be used for those permit modifications:"	Ecology -
48.	1, Section 1.4.1, Table 1.3	Please refer to DOE-RL Letter 06-AMRC-0261, dated June 7, 2006. Boiler Annexes 305, 306E, 3705, 3706, and 3720 have been permanently shut down. References to these boilers should be removed from Table 1.3 to be consistent with their previous removal from Attachment 1, Section 1.2, Table 1.1.	Remove reference to Boiler Annexes 305, 306E, 3705, 3706, and 3720 from Attachment 1, Section 1.4.1, Table 1.3.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
49.	1, Table 1.6	Page 59, Discharge Point P-291Z001-001 NOC approval DE04NWP-001 has been amended since April.	Will the new amendment be added at the conclusion of the public review?	Ecology -
50.	1, Table 1.6	Page 59, Discharge Point P-291Z001-001 Condition: Total Emission Limits: C. appears to be incomplete	Provide complete text for C.	Ecology -
51.	1, Page ATT 1-7	"300 EP-3020-07-S, 300 EP-3020-08-S, 300 EP-3020-09-S Table 1.6 5mmBTU/hr natural gas (fuel oil backup) boilers, not subject to 40 CFR 60 Subpart Dc (WAC 173-400-115)." This entry in Table 1.1 is for EMSL which is no longer included in the AOP.	Remove entry.	Ecology -
52.	1, Page ATT 1-19	"300 EP-3020-12S 300 EP-3020-13S" This entry in Table 1.4 is for EMSL which is no longer included in the AOP	Remove entry.	Ecology -
53.	1, Page ATT 1-40	" Requirement Citation (WAC or Order Citation): DE 98NWP-003 **Condition Approval 9/1/1998"** These entries should be consistent with those shown on ATT 1-41 through 43 where they are shown as: " Requirement Citation (WAC or Order Citation): DE 98NWP-003, Amendment 1 **Condition Approval 1/19/2006"**	Change the entries on ATT 1-40 to be consistent with the entries on the subsequent pages which correctly reflect that the NOC was amended on 1/19/2006.	Ecology -
54.	1, Page ATT 1-5	Section 1.1, first sentence capitalize the word Basis.	Make changes as described.	Ecology -
55.	1, Page ATT 1-7	Bulk Vitrification Demonstration Facility, change 200W to 200 Area.	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
56.	1, Page ATT 1-8	For standardization add the following in front of the emission unit listed in the table 200W P-241U107-001, 200W P-241S102-001, 200W P-241-S112-001, 200E C-106 Sluicing, check with FH to determine if the same should be done to their emission units listed in the table.	Make changes as described.	Ecology -
57.	1, Page ATT 1-20	Ecology should consider deleting Table 1.5 from the AOP. The same Standard Conditions are listed in Table 1.2 for the emission units listed in Table 1.5.	Make changes as described.	Ecology -
58.	1, Page ATT 1-20	If the table is not deleted change 200W P-296SY 001 (Exhauster) to 200W P-296SY 001 (Tank Exhauster).	Make changes as described.	Ecology -
59.	1, Page ATT 1-21 through ATT 1-25	This section of Table 1.6 should be deleted since it duplicates Table 1.2 requirements. In some instance the requirement may be more stringent, however we believe that the more stringent requirements for visible emissions or opacity are incorrect since the emission unit cited use HEPA filters. Compliance for this type of emission unit is determined through Tier 3, maintaining abatement control technology to the standards for efficiency of 99.95%.	Make changes as described.	Ecology -
60.	1, Page ATT 1-23	If not deleted the second condition listed on the page third sentence has an extra period at the end of the sentence.	Make changes as described.	Ecology -
61.	1, Page ATT 1-29	First condition there is a formatting problem with the Test Frequency that runs through Required records.	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
62.	1, Page ATT 1-53	Condition needs clarification within the Condition for "…under item (C.) below." and "…emission limits of Condition 1, above." For "…under item (C.) below." add after below "as listed in Section 4, Emission Monitoring, subparagraph B of the NOC approval order DE03NWP-001R1.". For "…emission limits of Condition 1, above." add after Condition 1 "as listed in Section 1, Total Emission Limits of the NOC approval order DE03NWP-001R1.". The font on this page needs to be standardized to the other format of this section/table.	Make changes as described.	Ecology -
63.	1, Page ATT 1-54	The footnote on the bottom of the page, change the date from 3/17/2003 to 11/3/2004.	Make changes as described.	Ecology -
64.	1, Page ATT 1-55	The footnote on the bottom of the page, change the date from 3/17/2003 to 11/3/2004.	Make changes as described.	Ecology -
65.	1, Page ATT 1-56	Change the condition to read "Notification will be made ten (10) days prior to initiating waste retrieval operations from each tank covered by this Order." Clarified this condition was applicable to each tank waste retrieval operations.	Make changes as described.	Ecology -
66.	1, Page ATT 1-56	The footnote on the bottom of the page, change the date from 3/17/2003 to 11/3/2004.	Make changes as described.	Ecology -
67.	1, Page ATT 1-73	Indenting format on page needs to be standardized/fixed.	Make changes as described.	Ecology -
68.	1, Page ATT 1-76	The first condition listed has a 2-month rolling summation, in the NOC approval this is also stated as 2-month however in the NOC application it clear states that this was to be a 12-month rolling summation, change 2-month to 12-month.	Make changes as described.	Ecology -
69.	1, Page ATT 1-78	Second condition listed needs clarification within the Condition for "…Screening Level of Table 1." add after Table 1 "of the NOC approval order DE05NWP-001.".	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
70.	1, Page ATT 1-78	Second condition listed needs clarification within the Required Records for "…Section 1.0 of the NOC approval." add after approval "DE05NWP-001.". For "…effective date of this ORDER…." add after ORDER "DE05NWP-001.".	Make changes as described.	Ecology -
71.	1, Page ATT 1-78	Correct formatting in the second condition Required Records.	Make changes as described.	Ecology -
72.	1, Page ATT 1-79	Condition listed needs clarification within the Periodic Monitoring for "…Sections 3.1 and 3.2 of NOC approval, " add after NOC approval "order DE05NWP-001,".	Make changes as described.	Ecology
73.	1, Page ATT 1-79	Condition listed needs clarification within the Test Frequency for "…operation assessment under Section 3.1." add after a Section 3.1. "of NOC approval order DE05NWP-001.".	Make changes as described.	Ecology -
74.	1, Page ATT 1-79	Should this condition be adjusted if the baseline assessments for single and dual trains have been completed?	Make changes as described.	Ecology -
75.	1, Page ATT 1-80	Second condition, remove the period following the word estimates in the following "…emissions estimates shall be…".	Make changes as described.	Ecology -
76.	1, Page ATT 1-80	Correct formatting in the second condition Periodic Monitoring.	Make changes as described.	Ecology -
77.	1, Page ATT 1-82	First condition listed needs clarification within the Condition for "…Screening Level of Table 1, above." add after Table 1, above "of the NOC approval order DE05NWP-002.".	Make changes as described.	Ecology -
78.	1, Page ATT 1-82	First condition listed needs clarification within the Required Records for "…effective date of this ORDER…." add after ORDER "DE05NWP-002.".	Make changes as described.	Ecology -
79.	1, Page ATT 1-82	Correct formatting in the first condition Required Records.	Make changes as described.	Ecology -
80.	1, Page ATT 1-82	Correct formatting in the second condition Periodic Monitoring.	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
81.	1, Page ATT 1-83	First condition correct formatting for Periodic Monitoring.	Make changes as described.	Ecology -
82.	1, Page ATT 1-83	Second condition, change Condition Approval to read only 2/18/2005, delete reference to Holiday Inn, etc.	Make changes as described.	Ecology -
83.	1, Page ATT 1-83	Third condition listed needs clarification within the Condition for "…effective date of this ORDER…." add after ORDER "DE05NWP-002.". For "…effective date of this ORDER…." add after ORDER "DE05NWP-002.".	Make changes as described.	Ecology -
84.	1, Page ATT 1-88	Tier 3, change the one sentence to read as follows "Maintain abatement control technology as required in AOP Attachment 2, Attachment 1 (emission unit specific) and Attachment 2 (Table 2.1 Diffuse and Fugitive emission Units) of the FF-01 License.	Make changes as described.	Ecology -
85.	1, Page ATT 1-90	Section 2.7, table, column titled, "Calculation model (3.1)" should be changed to read "Calculation Model (Statement of Basis 3.1.1)".	Make changes as described.	Ecology -
86.	1, ATT 1-32	Condition Approval 6/30/2000 Condition: "A new/modified NOC will be required, if total emissions of toxic air pollutants exceed the Small Quantity Emission Rates, unless dispersion modeling demonstrates that emissions would continue to result in concentrations less than the ASILs. Results of any such modeling demonstrations/calculations will be on file at the facility and made available upon inspection. Periodic Monitoring: Analyze total emissions to determine if an ASIL will be exceeded."	Delete condition. The condition was obsoleted per the administrative amendment DE00NWP-002, Revision 1, dated 6/29/06.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
87.	1, ATT 1-33	Condition Approval 6/30/2000 Condition: "An annual assessment of SWITS shall be conducted to document compliance that no monitoring and/or sampling systems are needed. This assessment will be reported annually beginning as part of the Calendar Year 1999 nonradioactive inventory of airborne emissions. Periodic Monitoring: Conduct an assessment of SWITS data and publish results"	Delete condition. The condition was obsoleted per the administrative amendment DE00NWP-002, Revision 1, dated 6/29/06.	Ecology -
88.	1, Section 3.1	Emission Calculations from the original AOP, Attachment 1 appears to be missing from this draft. However the calculations are included in the Statement of Basis for Attachment 1 as Section 3.1.	Include a Section 3.1 in Attachment 1, as follows: "Emission calculations for SO_2, nitrogen oxides, volatile organic compounds, ammonia, gas cylinders, chemical inventory, air concentrations, and TAPS can be found in Section 3.1 of the Statement of Basis for Attachment 1."	Ecology -
89.	1, Page ATT 1-68	Condition 1.2 under Discharge Point P-WTP-001 Required Records:	Please add the word "supplied" that was omitted from the end of the sentence. Records of monthly fuel purchases and use and an annual certification, from the fuel distributor, stating the sulfur content of the fuel that was <u>supplied</u>.	
90.	1, SOB, Page 10 of 34	Statement of Basis for Attachment 1, last sentence in Tier 3 paragraph, change "…Attachment 2, Tables 1.0, 1.1 or 1.2,…" to "…Attachment 2, Attachment 1 (emission unit specific)…".	Make changes as described.	Ecology -
91.	1, SOB, Page 12 of 34	Correct section 2.9, remove the period after 1,000.	Make changes as described.	Ecology -
92.	1, SOB, Page 13 of 34	Section 3.0, last sentence, change sentence to read as follows "These NOC approval applications should be kept as records."	Make changes as described.	Ecology -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
93.	1, SOB, Page 13 of 34	Section 3.1.1 first sentence "Not listed in AOP as a model being used." Should be deleted since the model is called out in section 2.7 of Attachment 1 of the AOP.	Make changes as described.	Ecology -
94.	1, SOB, Page 28 of 34	Second paragraph, first sentence delete the word "and" found between "…stacks from…" . The last sentence of this paragraph should be changed to read as follows "The diffuse and fugitive package was recommended for WDOH inclusion in the AOP renewal statement of basis however WDOH used the package to generate Attachment 2 (Table 2.1 Diffuse and Fugitive) of Attachment 2 of the AOP."	Make changes as described.	Ecology -
95.	2	General comment – The nomenclature is confusing for identification of the Attachments 1, 2, and 3 provided under "Attachment 2."	Perhaps rename the lowest tier items to be Enclosures A, B, and C.	WDOH -
96.	2, Attachment 1	For all portions of the Attachment 2 specific to the FF-01 license contents, please review for consistency and standardization of terminology, format and requirements among all emission units, to assure these contents and the AOP are congruent.	The review should include a reevaluation for general format and consistency among all emission units identified. As mentioned in the DOE Hanford July 5 acceptance of the revised FF-01 license, the licensee/permitee remains available to provide further assistance with the requested review, through additional meetings or correspondence, to address any remaining changes or updates to the AOP Attachment 2 to assure conformance with the FF-01 License and its requirements.	WDOH
97.	2, Attachment 1	In the new FF-01 there is a new section for each Emission Unit Specific entry called "Emission Unit Information" that identifies stack height, stack diameter, average effluent temperature and average stack velocity. Attachment 2 of the AOP, in the FF-01 under "**The emission unit specific information**" (pg. 20 of 756) states that these parameters are used by the department to identify significant changes in operation of an emission unit and to assure consistent emission unit Operation. Listing of this information for	The Emission Unit Information for Hanford exhaust systems should not be so specific in this license, where the intent noted above in *italics* is very subjective to each person reading that information. It is requested this information be removed from the license, or very clear operationally obtainable definitions should be provided by the Agency for those terms used within WAC 246-247-080(3)(f), as only the information requested under WAC 246-247-110(6) is	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		each specific Emission Unit entry in the FF-01 appears to be, at least in part, for the agency's convenience regarding identification and printing from their database. This information has already been provided to WDOH in NOC applications and/or the annual radionuclide air emissions report, and does not have a clear regulatory basis nor any added benefit for inclusion in the license, so it should be removed. If kept in by the agency, then the page 20 of 756 entry should include a clear statement that no separate AOP compliance certification is required for this information. In a previous WDOH supplied sheet during the development of the FF-01, the data specific to the emission unit specific information is identified as follows: *"The emission unit specific information (i.e., stack height and diameter, average temperature and velocity) are parameters used by the department to identify significant changes in operation of an emission unit. The emission unit specific information contained in this license is to assure consistent emission unit operation, the actual emission parameters must be maintained by the emission unit owner/operator and reported as required by both WAC 246-247 and 40 CFR 61 Subpart H."* Clearly the operator of an emission unit must meet these requirements in the regulations cited. One concern regards what is meant by "average" and this should be defined if kept in by the agency. In addition, there appears to be no basis as to why rated manufacturer capacity should not be used for this information instead. Exhausters from an engineering standpoint typically maintain tanks or other structures at a certain vacuum range. This range	required content for NOC applications.	

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		can vary greatly with each specific structure, particularly when using portable exhausters. WAC 246-247-080(3)(f) cites that a facility must report annual average emission unit flow rate and total volume of air released during the calendar year. This is completed on an annual basis for the Hanford Site with a radionuclide air emissions report that is certified by the contractors, and then DOE. Further, it is clear that any significant change in the stack parameters would reflect modified activities at the emission unit, and these modifications are already assured to be identified to the agency under the General Condition sections 1.5 and 3.5 of the FF-01.		
98.	2, FF-01, Section 4.0.	Section 4.0 discusses minor/point sources of emissions. This is confusing.	It is suggested that the text be changed to read "minor point sources".	WDOH -
99.	2, FF-01, Emission Unit Specific License	Plutonium Finishing Plant emission units, 291-Z-1, 296-Z-5, 296-Z-6, 296-Z-7, concrete containers and 200 Area Diffuse/ Fugitive have been issued a newer NOC approval (AIR 06-603, NOC ID: 644).	Will the new NOC approval be added at the conclusion of the public review?	WDOH -
100.	2, FF-01, Emission Unit Specific License	The monitoring and testing requirements for minor stacks reference Section 4.1 of the standard conditions (e.g., page 360, emission unit 389). There are no subsections in section 4.0	Change the reference to 4.0 (applies to all minor emission units)	WDOH -
101.	2, FF-01, EU_ID 175	For the 318 Building, EUID 175 the action under Condition 2, Paragraph 2 to install a single stage HEPA filter into the exhaust flow duct in Room 126 has been completed.	Recommend removing this paragraph from the permit.	WDOH -
102.	2, General Conditions – WDOH, Page 13	Memorandum of Understanding Between Ecology and WDOH, DOH Contract #N1256 does not match the footer number of #N14256 on **pages 13 – 19**.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
103.	2, General Conditions – WDOH, Page 20	Under the section titled "Interpretation of the Regulations and Definitions", 2nd paragraph, 2nd sentence; change "applicable" to "applicability".	Make changes as described.	WDOH -
104.	2, General Conditions – WDOH, Page 58	Under the section titled "5.1 Diffuse and Fugitive Sources at Hanford", 1st paragraph, 2nd sentence, remove the ";" after "monitored;" and replace with a ",".	Make changes as described.	WDOH -
105.	2, Page 1 of 4 for EU_ID 50 Page 1 of 6 for EU_ID 58 Page 1 of 6 for EU_ID 455 Page 1 of 1 for EU 712 Page 1 of 1 for EU_ID 716 Page 1 of 1 for EU_ID 717 Page 1 of 4 for EU_ID 740 Page 1of 4 for EU_ID 887	Abatement Technology, BARCT WAC 246-247-040(3), delete the reference ", 040(4)". Standardization within the permit for applying the correct requirements for the abatement technology. For EU ID 455 and 712 change the ALARACT and citation to "BARCT WAC 246-247-040(3)."	Make changes as described.	WDOH -
106.	2, Page 1 of 1 for EU_ID 53 Page 1 of 1 for EU_ID 64 Page 1 of 1 for EU_ID 156	New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
	Page 1 of 1 for EU_ID 205 Page 1 of 1 for EU_ID 217 Page 1 of 1 for EU_ID 218 Page 1 of 1 for EU_ID 228 Page 1 of 1 for EU_ID 438			
107.	2, Page 7 of 7 for EU_ID 93 Page 7 of 7 for EU_ID 204 Page 13 of 14 for EU_ID 498 Page 3 of 4 for EU_ID 539 Page 3 of 4 for EU 541 Page 9 of 9 for EU_ID 713 Page 2 of 2 for EU_ID 735 Page 3 of 4 for EU_ID 738	For each page listed there is a condition on the page that should be changed to the proposed standard condition text. "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%."	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
	Page 3 of 4 for EU_ID 740 Page 3 of 3 for EU_ID 742 Page 3 of 4 for EU_ID 744 Page 2 of 2 for EU_ID 855 Page 4 of 4 for EU_ID 878 Page 3 of 3 for EU_ID 912 Page 3 of 3 for EU_ID 922 Page 3 of 3 for EU_ID 959 Page3 of 9 for EU_ID 969			
108.	2, Page 1 of 1 for EU_ID 54 Page 1 of 1 for EU_ID 145 Page 1 of 1 for EU_ID 165 Page 1 of 1 for EU_ID 166	Emission Unit ID: 54 is a non-operational unit. As such a request to change as a standardization for non-operational units listed in FF-01: a. Replace "This is a Minor, Actively ventilated emission unit with "Non-Operational emission unit." b. In the section titled "Emission Unit information, delete all values listed for average stack effluent temperature and average stack exhaust velocity, since the emission unit is non-operational and has no	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
	Page 1 of 1 for EU_ID 208 Page 1 of 1 for EU_ID 213 Page 1 of 1 for EU_ID 234 Page 1 of 1 for EU_ID 236 Page 1 of 1 for EU_ID 308	effluent discharging from it. c. Abatement technology should be either ALARCT or BARCT with only one applicable citation (currently correct as listed) d. Any abatement equipment listed should appear exactly the same as emission unit ID 54 for the specified emission unit listed on the pages listed. (Required number of units/Additional Description) e. Federal and State Regulatory delete the reference 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3), because there is no applicability for a non-operational unit. f. Monitoring and Testing Requirements replace “Appendix B, Method 114” with “Non-operational”, because there is no applicability for a non-operational unit. g. Radionuclides Requiring Measurement delete the reference to “Total Alpha and Total Beta” because there is no applicability for a non-operational unit. h. Sampling Frequency delete the reference to 4 week sample/year because there is no applicability for a non-operational unit. i. Sampling Requirements replace “Record Sample” with “Non-operational” because there is no applicability for a non-operational unit. j. Operational Status replace “Operations Status” with a standard non-operational emission unit text as follows: “The emission unit is non-operational, removed from service and will not be utilized for future tank farm operations. If the emission unit is required for tank farm operations, the proper regulatory requirements and permits will be obtained		

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		prior to returning the emission unit to service. Closure is pending submittal of closure form and final inspection and approval by WDOH."		
109.	2, Page 4 of 4 for EU_ID 50 Page 9 of 9 for EU_ID 57 Page 6 of 6 for EU_ID 58 Page 81 of 87 for EU_ID 486 Page 14 of 14 for EU 498 Page 4 of 4 for EU 885	• NOC ID 703: Condition 15, last sentence has been completed by CH2M HILL. • NOC ID 703: Condition 15, last sentence has been completed by CH2M HILL. • NOC ID 703: Condition 15, last sentence has been completed by CH2m HILL. • NOC ID 713: Remove Condition 5 because it has been completed. • If the technical justification referred to in Condition 15 was submitted and approved, delete the last sentence. • Delete the last sentence in Condition 16 if the technical justification document was submitted and approved. Conditions listed in the order that the pages are listed i.e., the first bullet goes with the first page.	Make changes as described.	WDOH -
110.	2, Page 1 of 1 for EU_ID 97 Page 1 of 1 for EU_ID 98 Page 1 of 1 for EU_ID 101 Page 1 of 1 for EU_ID 108	• There was a request to add some "Additional Requirements" to SST Sampling Requirements during the comment review process. WDOH made a change to reflect the need to address "Additional Requirements" for SSTs with stack extensions. CH2M HILL is requesting the requirement for SST "Sampling Requirements" be added back to the emission units with the "Additional Requirements" listed below the	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
	Page 1 of 1 for EU_ID 111 Page 1 of 1 for EU_ID 112 Page 1 of 1 for EU_ID 255 Page 1 of 1 for EU_ID 291 Page 1 of 1 for EU 737	"Sampling Requirements". The standard SST "Sampling Requirements" should read as follows: "Smear survey on the inside surface of the ducting and downstream of the HEPA filter on the outside of the screen covering the outlet vent.", while having the "Additional Requirements" for SSTs with stack extensions listed below. • There is a typographical error in the first sentence of the "Additional Requirements" listed under sampling requirements, change "fo" to "of". The change is to standardize the basic sampling requirements for SSTs, while adding the additional requirements for SSTs with stack extensions.		
111.	2, Page 1 of 10 for EU 447 Page 1 of 23 for EU 476	• Abatement Technology, BARCT WAC 246-247-040(3), delete the reference ", 040(4)". Standardization within the permit for applying the correct requirements for the abatement technology. For EU ID 476, change the ALARACT and citation to "BARCT WAC 246-247-040(3)." • New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements.	Make changes as described.	WDOH -
112.	2, Page 1 of 1 for EU_ID 56	New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements.	Make changes as described.	WDOH -
113.	2, Page 1 of 1 for EU_ID 56	Operations Status for a standard primary exhaust should be changed to read as follows:	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		"This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241-SY Tank Farm during storage, maintenance, and normal operations. **Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the applicable regulations and/or permits for the activity being performed and the emission units associated with the activity.** This emission unit operates with the "B" train (Western most unit) while the "A" train (Eastern most unit) operates in conjunction with the emission unit (296-S-25). This emission unit is operated in alternation with the "A" train when "B" train is not operational. The emission unit operates intermittently or continuously."		
114.	2, Page 1 of 9 for EU_ID 57	• Abatement Technology, BARCT WAC 246-247-040(3), delete the reference ", 040(4)". Standardization within the permit for applying the correct requirements for the abatement technology. • Add "collected biweekly" to the end of Sampling Requirements.	Make changes as described.	WDOH -
115.	2, Page 4 of 9 for EU_ID 57	NOC ID: 686, Condition 9 should be changed to reflect standardization of HEPA Filter testing amongst EUs and NOC conditions: "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%."	Make changes as described.	WDOH -
116.	2, Page 4 of 9 for EU_ID 57	NOC ID: 686, Condition 10 condition was truncated, add the following: "…depending on the mobilization effort desired."	Make changes as described.	WDOH -
117.	2, Page 4 of 9 for EU_ID 57	Condition 12, typographical error, change "DOH" to "WDOH".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
118.	2, Page 6 of 9 for EU_ID 57	NOC ID: 694, Condition 7 should be listed as two separate conditions one for the trip point for the heater and the second for the HEPA filter requirement. Please add a new Condition 8 and renumber existing Condition "8" to Condition "9". Condition 7 should be changed to "The heater shall have an automatic trip set point below 200 degrees F." The new Condition 8 should read as the standard condition being used for HEPA filters testing "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%."	Make changes as described.	WDOH -
119.	2, Page 6 of 9 for EU_ID 57	NOC ID: 694, existing Condition 8 should be changed to move the citation following 8(f) to follow the Condition 8 requirements. In addition this condition should be changed to read as follows: "The emission unit monitoring system shall have the following activities performed: [WAC 246-247-040(5)". The October 25, 2003 is a deadline for the initial request and testing which has been completed and the condition is now an on going requirement for the operation of the emission unit.	Make changes as described.	WDOH -
120.	2, Page 3 of 6 for EU_ID 58	NOC ID: 694, Condition 8 should be listed as two separate conditions on for the trip point for the heater and the second for the HEPA filter requirement. Please add a new Condition 9 and renumber existing Condition "9" to Condition "10". Condition 8 should be changed to "The heater shall have an automatic trip set point below 200 degrees F." The new Condition 9 should read as the standard condition being used for HEPA filters testing "Each HEPA filter shall be in-placed tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%."	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
121.	2, Page 3 of 6 for EU_ID 58	• NOC ID: 694, existing Condition 9 should be changed to move the citation following 9(f) to follow the Condition 9 requirements. • Renumber to new Condition 10. In addition this condition should be changed to read as follows: "The emission unit monitoring system shall have the following activities performed: [WAC 246-247-040(5)". The October 25, 2003 is a deadline for the initial request and testing which has been completed and the condition is now an on going requirement for the operation of the emission unit.	Make changes as described.	WDOH -
122.	2, Page 1 of 1 for EU_ID 59	New standard identified as: "40 CFR 61, Appendix B, Method 114" for any actively ventilated emission units. Standardization within the license and AOP for Monitoring and Testing Requirements.	Make changes as described.	WDOH -
123.	2, Page 1 of 1 for EU_ID 59	Operations Status for a standard primary exhaust should be changed to read as follows: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241-SY Tank Farm during storage, maintenance, and normal operations. **Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the applicable regulations and/or permits for the activity being performed and the emission units associated with the activity.** This emission unit operates with the "A" train (Eastern most unit) while the "B" train (Western most unit) operates in conjunction with the emission unit (295-P-23). This emission unit is operated in alternation with the "B" train when "A" train is not operational. The emission unit operates intermittently or continuously."	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
124.	2, Page 1 of 7 for EU_ID 93	For the following abatement technology component (condenser) please add the following to the Addition description; "**At common header.** Downtime to be negotiated with the department."	Make changes as described.	WDOH -
125.	2, Page 1 of 7 for EU_ID 93	Change Monitoring and Testing Requirements "Appendix B, Method 114" to "40 CFR 61, Appendix B, Method 114" clarity of requirements point source emission unit.	Make changes as described.	WDOH -
126.	2, Page 1 of 7 for EU_ID 93	Delete on "Pump" and associated additional description under the Abatement Technology table. Duplication	Make changes as described.	WDOH -
127.	2, Page 3 of 7 for EU_ID 93	NOC ID: 653, Condition 4 is the same as the standard requirement for notifying (24 hours)[WAC 246-247-080(5)] the agency of any deviations of the operations of either the emission unit or the NOC/License, as such this condition should be deleted.	Make changes as described.	WDOH -
128.	2, Page 1 of 1 for EU_ID 96	Change Monitoring and Testing Requirements "Appendix B, Method 114" to "40 CFR 61, Appendix B, Method 114" clarity of requirements point source emission unit.	Make changes as described.	WDOH -
129.	2, Page 1 of 1 for EU_ID 96	Operational status has a typographical error in the first sentence, change the word "use" to "used".	Make changes as described.	WDOH -
130.	2, Page 1 of 1 for EU_ID 100	Change average stack exhaust velocity: 0.17 to 1.91 ft/second and 0.05 to 0.58 m/second.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
131.	2, Page 1 of 1 for EU_ID 120	Add a period to the last sentence of the Operational Status. "This emission unit is a passive breather filter that allows a SST to vent to the atmosphere under tank farm storage, maintenance, and operation. The tank stores the radioactive waste awaiting retrieval, treatment, and proper disposal under the applicable federal and state regulations and/or permits. The SST scheduled activities of waste retrieval, decommissioning, and eventual closure will be completed under applicable federal and state regulations and/or permits. Any activity other than storage, maintenance, and normal operation conducted at the tank will obtain the appropriate permits for the activity and the emission units associated with the activity as required by the regulations applicable to the activity. The emission unit is a passive breather filter and is part of the tank's ventilation system that operates continuously."	Make changes as described.	WDOH -
132.	2, Page 1 of for EU_ID 128	Change Stack Diameter to 0.33 ft and 0.10 m for TX-109 B.F. which is a G-1 and the values listed, for stack diameter, are for an open face.	Make changes as described.	WDOH -
133.	2, Page 1 of 3 for EU_ID 134	Delete the Monitoring and Testing Requirement Appendix B, Method 114".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
134.	2, Page 1 of 3 for EU_ID 134	Replace the third sentence of the Operational Status with the following: "This emission unit is a passive breather filter that allows a SST to vent to the atmosphere under tank farm storage, maintenance, and operation. The tank stores the radioactive waste awaiting retrieval, treatment, and proper disposal under the applicable federal and state regulations and/or permits. **The SST scheduled activities of waste retrieval, decommissioning, and eventual closure will be completed under applicable federal and state regulations and/or permits.** Any activity other than storage, maintenance, and normal operation conducted at the tank will obtain the appropriate permits for the activity and the emission units associated with the activity as required by the regulations applicable to the activity. The emission unit is a passive breather filter and is part of the tank's ventilation system that operates continuously."	Make changes as described.	WDOH -
135.	2, Page 2 of 3 for EU_ID 134	Remove "Each HEPA filter shall be individually tested, annually, to the requirements of ASME N510, and shall have a minimum efficiency of 99.95%" from Condition 6 and insert as Condition 7 "Each HEPA filter shall be in-place tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%."	Make changes as described.	WDOH -
136.	2, Page 1 of 1 for EU_ID 141	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
137.	2, Page 1 of 1 for EU_ID 141	Replace the first sentence of the Operational Status with the following: This emission unit is a building/facility exhauster that is **used** to ventilate building and facility operations such as but not limited to process vessels, contaminated rooms, cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that support tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently.	Make changes as described.	WDOH -
138.	2, Page 1 of 2 for EU_ID 142	Change the Abatement Technology to "BARCT" with only "WAC 246-247-040(3)" as the citation.	Make changes as described.	
139.	2, Page 1 of 2 for EU_ID 142	Change the Monitoring and Testing Requirements to be “During campaigns: **40 CFR 61,** Method 2, appendix A Method **40 CFR 61** appendix B 61.93(b)(2)(ii) ANSI N13.1: During noncampaigns **40 CFR 61** Appendix B, Method 114 ”.	Make changes as described.	WDOH -
140.	2, Page 1 of 2 for EU_ID 142	Remove I-129 from the Radionuclides Requiring Measurement to be “Campaign: TOTAL ALPHA, TOTAL BETA, 137Cs, 90Sr, 239Pu, 238Pu, 241Am and each radionuclide that could contribute greater than 10% of the potential TEDE. Non-Campaign: TOTAL ALPHA, TOTAL BETA.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
141.	2, Page 1 of 1 for EU_ID 150	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -
142.	2, Page 1 of 1 for EU_ID 150	Replace the last sentence of the Operational Status with the following: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241-AW Tank Farm during storage, maintenance, and normal operations. Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. **The emission unit operates intermittently or continuously.**"	Make changes as described.	WDOH -
143.	2, Page 1 of 1 for EU_ID 162	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
144.	2, Page 1 of 1 for EU_ID 162	Replace the first sentence of the Operational Status with the following: This emission unit is a building/facility exhauster that is **used** to ventilate building and facility operations such as but not limited to process vessels, contaminated rooms, cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that support tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently.	Make changes as described.	WDOH -
145.	2, Page 1 of 1 for EU_ID 163	Change the Monitoring and Testing Requirement to be “40 CFR 61, Appendix B, Method 114”.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
146.	2, Page 1 of 1 for EU_ID 163	Replace the first sentence of the Operational Status with the following: This emission unit is a building/facility exhauster that is **used** to ventilate building and facility operations such as but not limited to process vessels, contaminated rooms, cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that support tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently.	Make changes as described.	WDOH -
147.	2, Page 1 of 2 for EU_ID 174	Change the Monitoring and Testing Requirement to be “40 CFR 61, Appendix B, Method 114”.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
148.	2, Page 1 of 2 for EU_ID 174	Replace the last three sentences of the Operational Status with the following: "This emission unit is a DST annulus exhauster used to support tank farm operations by ventilating the annuli of DSTs 241-AZ-101 and 241-AZ-102. Each train of this emission unit supports an individual tank (Train A for 241-AZ-101 and Train B for 241-AZ-102). **The tank stores radioactive waste until the waste is retrieved, treated, and properly disposed under the applicable federal and state regulations and/or permits. The annulus is the space between the inner wall and outer wall of the tank, and is used for leak detection. The emission unit operates continuously.**"	Make changes as described.	WDOH -
149.	2, Page 1 of 4 for EU_ID 203	Change the Abatement Technology to "BARCT" with only "WAC 246-247-040(3)" as the citation.	Make changes as described.	WDOH -
150.	2, Page 1 of 4 for EU_ID 203	Replace the third sentence of the Operational Status with the following: "This emission unit is a passive breather filter that allows a SST to vent to the atmosphere under tank farm storage, maintenance, and operation. The tank stores the radioactive waste awaiting retrieval, treatment, and proper disposal under the applicable federal and state regulations and/or permits. The **SST** ~~tanks are~~ scheduled activities of waste retrieval, decommissioning, and eventual closure will be completed under applicable federal and state regulations and/or permits. Any activity other than storage, maintenance, and normal operation conducted at the tank will obtain the appropriate permits for the activity and the emission units associated with the activity as required by the regulations applicable to the activity. The emission unit is a passive breather filter and is part of the tank's ventilation system that operates continuously."	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
151.	2, Page 4 of 4 for EU_ID 203	Remove "Each HEPA filter shall be individually tested, annually, to the requirements of ASME N510, and shall have a minimum efficiency of 99.95%" from Condition 8 and insert "Each HEPA filter shall be in-place tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." as a stand alone Condition 9.	Make changes as described.	WDOH -
152.	2, Page 1 of 7 for EU_ID 204	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -
153.	2, Page 1 of 7 for EU_ID 204	Replace the last sentence of the Operational Status with the following: "This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241 AP Tank Farm during storage, maintenance, and normal operations. Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. **The emission unit operates intermittently or continuously.**"	Make changes as described.	WDOH -
154.	2, Page 1 of 1 for EU_ID 216	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
155.	2, Page 1 of 1 for EU_ID 216	Replace the Operational Status with the following: This emission unit is a building/facility exhauster that is use**d** to ventilate building and facility operations such as but not limited to **process vessels,** contaminated rooms, **cells, glove boxes, hoods, abandoned facilities awaiting decommissioning, and vaults that** ~~and~~ support ~~equipment for~~ tank farm operations, maintenance, and surveillance activities for tank farms. The exhauster can be used to support current surveillance, maintenance activities, operations or decommissioning, decontamination, and cleanup activities within the building/facility. Many of the activities other than normal surveillance, maintenance, and operation support will be or are regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a building/facility exhauster ventilation system that operates intermittently."	Make changes as described.	WDOH -
156.	2, Page 1 of 8 for EU_ID 227	Remove the WAC 246-247-040(4) citation from the Abatement Technology.	Make changes as described.	WDOH -
157.	2, Page 1 of 8 for EU_ID 227	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
158.	2, Page 1 of 8 for EU_ID 227	Replace the last sentence of the Operational Status with the following: This emission unit is a primary exhauster used to support tank farm operations by ventilating the DSTs in 241 AN Tank Farm during storage, maintenance, and normal operations. Any activity other than storage, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. **The emission unit operates intermittently or continuously.**	Make changes as described.	WDOH -
159.	2, Page 1 of 8 for EU_ID 227	Change "This is a Major, Actively…" to "This is a Minor Activity…"	Make changes as described.	WDOH -
160.	2, Page 1 of 8 for EU_ID 227	Change Federal and State Regulatory from WAC 246-247-075(2) to WAC 246-247-075(3) to reflect the change from major to minor.	Make changes as described.	WDOH -
161.	2, Page 1 of 8 for EU_ID 227	Change Radionuclides Requiring Measurement to reflect the change from major to minor emission unit change "Each radionuclide that could contribute greater then 10% of the potential TEDE" to "Total Alpha Total Beta."	Make changes as described.	WDOH -
162.	2, Page 1 of 8 for EU_ID 227	Change Sampling Frequency to reflect the change from minor to major emission unit change "Continuous" to "4 week sample/year."	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
163.	2, Page 2 of 8 for EU 227	Per revision form dated 3/14/01, insert the following into Condition 2 of NOC ID 668: New In-Tank Equipment: Installation of up to two mixer pumps in each tank for mobilizing the settled solids. The pump will be capable of pumping waste through each of two, horizontally opposed, discharge nozzles, located approximately 18 inches above the bottom of the tank. Installation of a high-pressure spray wash system on top of each of the risers used for the mixer pumps. The spray wash system will be used for future decontamination of the mixer pumps as they are removed from the tank. Installation of one transfer pump in each tank for the transfer of waste. Installation of one closed circuit television for each tank. Installation of one thermocouple tree for each tank, as required. **Installation of caustic addition distribution lines to allow the addition of caustic.**	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
164.	2, Page 3 of 8 for EU 227	Per revision form dated 3/14/01, insert the following (bold)into Condition 2 of NOC ID 668: New pit coverblocks for AN-01A, AN-02A, AN-03A, AN-04A, AN-05A, AN-06A and AN-07A. Installation of new water and diluent piping to and from the process pits. A total of approximately 2,800 linear feet of piping will be installed at a dept of up to 5 feet underground. Installation of new process jumpers inside existing central pits (AN01A, AN02A, AN03A, AN04A, AN05A, AN06A and AN07A) and the 241-AN-A/B Valve Pits. Installation of miscellaneous concrete pads for electrical and mechanical equipment. Installation of chain-link fencing and gates. **Operation of Existing In-tank Equipment** **Operation of existing transfer pumps, slurry distributors, and other in-tank equipment for the purpose of adding and mixing caustic to ensure wastes meet tank specifications.**	Make changes as described.	WDOH -
165.	2, Page 1 of 2 for EU_ID 254	Remove ALARACT from the Abatement Technology and replace with BARCT.	Make changes as described.	WDOH -
166.	2, Page 1 of 2 for EU_ID 254	Remove the WAC 246-247-040(4) citation from the Abatement Technology and replace with WAC 246-247-040(3).	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
167.	2, Page 1 of 2 for EU_ID 254	Add the last sentence to the Operational Status: "This emission unit is a laboratory building/facility exhauster that is used to ventilate building and facility operations such as but not limited to contaminated rooms, hot cells, glove boxes, and hoods, that support tank farm waste characterization activities, research and development, environmental sample analysis, and Hanford operations and remediation projects. The exhauster can be used to support current surveillance, maintenance activities, operations, decontamination, and cleanup activities within the building/facility. **The emission unit is a laboratory building/facility exhauster ventilation system that operates continuously.**"	Make changes as described.	WDOH -
168.	2, Page 2 of 2 for EU_ID 254	Revise the allowable percentage of particulate matter requirement for HEPA filters in the following description in Condition 2: "Emissions from the hot cell will be exhausted through the existing stack at the 222-S Facility (registered stack number 296-S-21). Approximately 1200 cubic feet per minute will be emitted from the hot cell. Prior to being emitted to the atmosphere, the hot cell exhaust shall pass through two sets of existing High-Efficiency Particulate Air (HEPA) Filters (double HEPAs at both the 222-SC and 222-SB Facilities), in addition to one of the three new single-stage HEPA filters adjoining the hot cell. HEPA Filters are tested in place to ensure that they remove at least ~~99.5~~**99.95** percent of particles ranging in size from 0.1 micron to 3.0 microns, with a mean particle size of 0.5 micron."	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
169.	2, Page 1 of 1 for EU_ID 259	Change the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m – Stack Diameter: 0.13 ft 0.04 m – Average Stack Effluent Temp: 55 degrees F – 13 degrees C – Average Stack Velocity: 0.25 ft/second – 0.08 m/second	Make changes as described.	WDOH -
170.	2, Page 1 of 1 for EU_ID 265	Remove "See additional requirements below." from the Sampling Requirements and replace with "Smear survey on the inside surface of the ducting and downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent". This is not a stack extension tank.	Make changes as described.	WDOH -
171.	2, Page 1 of 1 for EU_ID 265	Replace the Additional Requirements with the following "Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable." This is not a stack extension tank.	Make changes as described.	WDOH -
172.	2, Page 1 of 1 for EU_ID 293	Insert a "1" for the Required Number of Units.	Make changes as described.	WDOH -
173.	2, Page 1 of 1 for EU_ID 337	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
174.	2, Page 1 of 1 for EU_ID 337	Add the last sentence to the Operational Status. "This emission unit is a waste handling building/facility exhauster that is used to ventilate building and facility operations such as but not limited to liquid waste tanks that support tank farm waste characterization activities, research and development, environmental sample analysis, and Hanford operation and remediation projects. **The emission unit operates continuously.**"	Make changes as described.	WDOH -
175.	2, Page 14 of 23 for EU_ID 476	NOC ID 685: Replace the first sentence of the ninth general control in Condition 2 with the following: 9. The 1,000 cfm exhauster shall be equipped with a two-stage HEPA filter, which meets the requirements of ASME AG-1, Section FC and shall be tested annually to requirements of ASME **AG-1**. The HEPA filters shall have an efficiency of 99.95 percent for 0.3-micron median diameter. Each filter housing shall meet the applicable sections of ASME N509 and the test requirement of ASME N510. The exhaust stack houses a Generic Effluent Monitoring System (GEMS) that contains an air velocity probe and the air sampling probe.	Make changes as described.	WDOH -
176.	2, Page 18 of 23 for EU_ID 476	NOC ID 702: Change the total abated emission limit to 3.32 E+00 mrem/year to the MEI and the total PTE to 3.32 E+00. AIR 05-406 increased the PTE.	Make changes as described.	WDOH -
177.	2, Page 20 of 23 for EU_ID 476	NOC ID 702: Condition 5, 2nd sentence, change the total abated and unabated limit back to 0.1 mrem/year for use of the guzzler as stated in AIR 05-406, which was the previous approval for this project prior to the re-issuance of the FF-01.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
178.	2, Page 23 of 23 for EU_ID 476	NOC ID 714: Replace Condition 5 with the following: "Use of the Guzzler shall comply with all Conditions and Limitations identified in the latest approval or revision of NOC ID 647, Guzzler Excavation and Backfilling Activities in Support of the 200 East Area A Farm Complex."	Make changes as described.	WDOH -
179.	2, Page 1 of 4 for EU_ID 477	Change "This is a MINOR, ACTIVELY ventilated emission unit." to "This is a MINOR, FUGITIVE, non-point source emission unit."	Make changes as described.	WDOH -
180.	2, Page 1 of 4 for EU_ID 477	Remove the WAC 246-247-040(4) citation from the Abatement Technology.	Make changes as described.	WDOH -
181.	2, Page 1 of 4 for EU_ID 477	Add to the existing Additional Requirements "See Section 5 of the general conditions in this license for additional information."	Make changes as described.	WDOH -
182.	2, Page 1 of 87 for EU_ID 486	Remove the duplicated "200" from the AEI.	Make changes as described.	WDOH -
183.	2, Page 1 of 87 for EU_ID 486	Remove the WAC 246-247-040(4) citation from the Abatement Technology.	Make changes as described.	WDOH -
184.	2, Page 1 of 87 for EU_ID 486	Change the Monitoring and Testing Requirement to be "40 CFR 61, Appendix B, Method 114".	Make changes as described.	WDOH -
185.	2, Page 14 of 87 for EU_ID 486	Remove Condition 6. WDOH verbally approved the APQ tracking methodology employed by the field and the tracking requirement is captured by Condition 8 and the WAC 246-247 General Conditions and Limitations.	Make changes as described.	WDOH -
186.	2, Page 14 of 87 for EU_ID 486	Remove Condition 14 from NOC ID: 673 under emission unit 200 Area Diffuse/Fugitive (EU ID: 486). The condition is specific to Hanford Sitewide type-1, type-2, type-3 emission unit (EU ID: 447) and is listed as Condition 11 under NOC ID: 673 on Page 6 of 10 for EU ID 447	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
187.	2, Page 26 of 87 for EU_ID 486	NOC ID 685: Replace the first sentence of the ninth general control in Condition 2 with the following: 9. The 1,000 cfm exhauster shall be equipped with a two-stage HEPA filter, which meets the requirements of ASME AG-1, Section FC and shall be tested annually to requirements of ASME **AG-1**. The HEPA filters shall have an efficiency of 99.95 percent for 0.3-micron median diameter. Each filter housing shall meet the applicable sections of ASME N509 and the test requirement of ASME N510. The exhaust stack houses a Generic Effluent Monitoring System (GEMS) that contains an air velocity probe and the air sampling probe.	Make changes as described.	WDOH -
188.	2, Page 27 of 87 for EU_ID 486	NOC ID 685: Remove Condition 8, because it is covered by the requirements of Condition 9.	Make changes as described.	WDOH -
189.	2, Page 49 of 87 for EU 486	NOC ID 698: Per revision form dated 9/24/03, insert the following (bold) into Condition 2 of NOC ID 698: Diffuse and Fugitive: a. Proposed Actions for Tanks C-201 through C-204: ~~i. Removal of weather covers and debris from jet pump pits and ventilation hatchways (ALARACTs 1, 4, 6, 12, 13, 14, and 15)~~ **i Remove the thermocouple trees from the top of the pump pit (no pit access is necessary) using ALARACTs 13, 14, and 15.** **k. Access pump pit to remove pump in C-204 (no removal of sluice eductors will be performed) (using ALARACTs 1, 4, 6, 13,**	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		14, 15) and general access may be needed for the other pump pits and have been calculated in a pit access potential-to-emit. **l. Remove the breather filters and reinstall with an inlet filter on each tank.** **m. Lift the ventilation hatchway cover (condenser pit hatchway) which is ¼-inch steel thickness and may be potentially attached to an old fiberglass filter assembly (using ALARACTs 1, 4, 6, 13, 14, and 15 as guidance for contamination levels and controls) which will be with drawn in a large sleeve (fully enclosed) from the pit, lifted, pig-tailed and sealed. The filter will not be exposed to the environment while lifting. The filter will then be placed in a mixed waste disposal box and will not be left out in the environment. Smearable contamination levels on the outside of the bag will not exceed 50,000 dpm beta/gamma and 20 dpm alpha.** ii. Remove condenser pit filter assembly and replace tank breather filter with a Y-duct assembly (ALARACTs 1, 4, 12, 15, and 16) iii. Remove liquid level reels and thermocouple trees, 1 each per tank (ALARACTs 1, 4, 6, 12, 13, 14, and 15) iv. Remove sluice eductor pump from Tank C-204, if necessary (ALARACTs 1, 4, 6, 12, 13, 14, and 15) b. Tank Equipment Installations:		

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		i. AMS with connected hydraulic power pack, one per tank (ALARACTs 1, 4, 6, 12, 13, and 14) ~~ii. Ventiliation inlet filter assembly, one per tank (ALARACTs 1, 4, 12, 13 and 16)~~ **ii Install ventilation inlet filter assembly to existing inlet filter on each tank (using ALARACTs 13 and 16).** • **Remove the ventilation hatchway (condenser pit) cover with the presumed attached fiberglass filter using a crane and lifting hook and placed immediately into a mixed waste disposal box. ALARACT 13 controls will be used for contamination guidance and controls (less than 50,000 dpm beta/gamma and 20 dpm alpha).** • **The asbestos gasket for the ventilation hatchway (condenser pit) if present will be removed using fixative while a bag is in place over the ventilation hatchway (condenser pit). The plastic will be slowly removed to minimize hatchway access while concurrently a new ventilation hatchway cover (condenser pit) will be slid onto the pit access next to the plastic and rebolted to the pit. ALARACT 13 controls will be used for contamination guidance and controls (less than 50,000 dpm beta/gamma and 20 dpm alpha). The ventilation hatchway will have a connection so that the 296-P-48 exhauster will be connected to when active retrieval occurs.** • **A single set of return and suction lines shall be placed at each tank to the central**		

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		skid vacuum vessel during retrieval. After each tank is retrieved a small amount of water will be flushed through the line and checked for smearable contamination and dose readings by a Health Physics Technician to ensure minimal contamination is in place in the line. A valve will be closed at the tank surface manifold box, the end of each hose wrapped in plastic, and then moved to the next tank for retrieval. Contamination remaining in the lines when moved has been accounted for by including all of the current tank contents in the total retrieval potential-to-emit calculations.		
190.	2, Page 61 of 87 for EU_ID 486	NOC ID 703: Replace Condition 7 with the following: "Retrieval activities shall occur under passive ventilation only when an exhauster can no~~t~~ longer be operated on a single shell tank due to structural concerns. The justification for structural concerns with the single shell tank shall be documented and provided to WDOH upon request." Delete the T from Not and make the word "no".	Make changes as described.	WDOH -
191.	2, Page 1 of 14 for EU 498	• Delete '040(4)' from Abatement Technology. • Delete '-to-emit' from Radionuclides Requiring Measurement. • Add 'or continuously' to the last sentence in Operational Status.	Make changes as described.	WDOH -
192.	2, Page 1 of 4 for EU 539	• Emission Unit Information missing, fill in the blank(s) with "0.00". • Delete '040(4)' from Abatement Technology. • Add '40 CFR 61' to Monitoring and Testing Requirements and delete '(3)'.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
193.	2, Page 1 of 4 for EU 541	• Emission Unit Information missing, fill in the blank(s) with “0.00”. • Sampling Frequency should read ‘After each borehole and record filter counted annually’. • Sampling Requirements – Delete ‘after each borehole’. Add ‘Perform a non-destructive NDA of the record filter using gamma spectroscopy calibrated to Cs137 and radiological surveys’. • Delete '040(4)' from Abatement Technology. • Add '40 CFR 61" to Monitoring and Testing Requirements and delete '(3)'.	Make changes as described.	WDOH -
194.	2, Page 1 of 9 for EU 713	• Add the following Emission Unit Information: – Stack Height: 3.00 ft 0.91 m – Stack Diameter: 0.33 ft 0.10m – Average Stack Effluent Temp: 55 degrees F – 13 degrees C – Average Stack Velocity: 1.91 ft/second – 0.58 m/second • Delete ‘040(4)’ from Abatement Technology. • Add ’40 CFR 61, Appendix B, Method 114,’ to Monitoring and Testing Requirements.	Make changes as described.	WDOH -
195.	2, Page 1 of 9 for EU 714 thru Page 9 of 9 for EU 714	Delete the emission unit from FF-01. The emission unit was not and will not be installed under the NOC, therefore the emission unit will never exist.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
196.	2, Page 1 of 2 for EU 735	• Change the stack velocity to 91.31 ft/sec and 27.83 m/sec. • Add '40 CFR 61' to Monitoring and Testing Requirements. • Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-45. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'.	Make changes as described.	WDOH -
197.	2, Page 1 of 2 for EU 736	• Fill in Stack Effluent temperature with "0.00". • Add '40 CFR 61' to Monitoring and Testing Requirements. • Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-44. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'.	Make changes as described.	WDOH -
198.	2, Page 2 of 2 for EU 736	• NOC ID 706: Condition 4 should be changed to reflect standardization of HEPA Filter testing amongst EUs and NOC conditions: "Each HEPA filter shall be in-laced tested annually in accordance with the requirements of ASME AG-1. HEPA filters shall have a minimum efficiency of 99.95%." • Delete Condition 7 associated with Subpart H QA requirements. See Monitoring Requirements where 40 CFR 61 H is listed already.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
199.	2, Page 1 of 4 for EU 738	• Add the following Emission Unit Information: – Stack Height: 3.00 ft 0.91 m – Stack Diameter: 0.33 ft 0.10m – Average Stack Effluent Temp: 55 degrees F – 13 degrees C – Average Stack Velocity: 1.91 ft/second – 0.58 m/second • Delete '040(4)' from Abatement Technology. • Add '40 CFR 61, Appendix B, Method 114' to Monitoring and Testing Requirements.	Make changes as described.	WDOH -
200.	2, Page 1 of 3 for EU 742	• Add Emission Unit Information: Height: 3.0 ft, 0.91 m, Diameter: 0.33 ft, 0.10 m, Temperature: 55 deg F, 13 deg C, Velocity: 1.91 ft/s, 0.58 m/s. • Delete '040(4)' from Abatement Technology. • Add '40 CFR 61, Appendix B, Method 114' to Monitoring and Testing Requirements. • Add as the last sentence under Operational Status 'The emission unit has a passive breather filter ventilation system that operates continuously'.	Make changes as described.	WDOH -
201.	2, Page 1 of 4 for EU 744	• Add Emission Unit Information: Height: 3.0 ft, 0.91 m, Diameter: 0.33 ft, 0.10 m, Temperature: 55 deg F, 13 deg C, Velocity: 1.91 ft/s, 0.58 m/s. • Delete '040(4)' from Abatement Technology • Add '40 CFR 61, Appendix B, Method 114' to Monitoring and Testing Requirements.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
202.	2, Page 1 of 6 for EU 749	• Delete '040(4)' from Abatement Technology. • Add 'or continuously' to the last sentence in Operational Status. • Change the Radionuclides Requiring Measurement to the following: "Each radionuclides that could contribute greater than 10 percent of the potential TEDE ~~to the MEI, greater than 0.1 mrem/yr potential-to-emit TEDE to the MEI, and greater than 25 percent of the TEDE to the MEI after controls"~~	Make changes as described.	WDOH -
203.	Page 2 of 6 for EU_ID 749	Per revision form dated 9/24/03, insert the following (bold) into Condition 2 of NOC ID 698: Diffuse and Fugitive: a. Proposed Actions for Tanks C-201 through C-204: ~~i. Removal of weather covers and debris from jet pump pits and ventilation hatchways (ALARACTs 1, 4, 6, 12, 13, 14, and 15)~~ **i Remove the thermocouple trees from the top of the pump pit (no pit access is necessary) using ALARACTs 13, 14, and 15.** **n. Access pump pit to remove pump in C-204 (no removal of sluice eductors will be performed) (using ALARACTs 1, 4, 6, 13, 14, 15) and general access may be needed for the other pump pits and have been calculated in a pit access potential-to-emit.** **o. Remove the breather filters and reinstall with an inlet filter on each tank.** **p. Lift the ventilation hatchway cover**	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		(condenser pit hatchway) which is ¼-inch steel thickness and may be potentially attached to an old fiberglass filter assembly (using ALARACTs 1, 4, 6, 13, 14, and 15 as guidance for contamination levels and controls) which will be with drawn in a large sleeve (fully enclosed) from the pit, lifted, pig-tailed and sealed. The filter will not be exposed to the environment while lifting. The filter will then be placed in a mixed waste disposal box and will not be left out in the environment. Smearable contamination levels on the outside of the bag will not exceed 50,000 dpm beta/gamma and 20 dpm alpha. ii. Remove condenser pit filter assembly and replace tank breather filter with a Y-duct assembly (ALARACTs 1, 4, 12, 15, and 16) iii. Remove liquid level reels and thermocouple trees, 1 each per tank (ALARACTs 1, 4, 6, 12, 13, 14, and 15) iv. Remove sluice eductor pump from Tank C-204, if necessary (ALARACTs 1, 4, 6, 12, 13, 14, and 15) b. Tank Equipment Installations: i. AMS with connected hydraulic power pack, one per tank (ALARACTs 1, 4, 6, 12, 13, and 14) ~~ii. Ventiliation inlet filter assembly, one per tank (ALARACTs 1, 4, 12, 13 and 16)~~ **ii Install ventilation inlet filter assembly to**		

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		existing inlet filter on each tank (using ALARACTs 13 and 16). • **Remove the ventilation hatchway (condenser pit) cover with the presumed attached fiberglass filter using a crane and lifting hook and placed immediately into a mixed waste disposal box. ALARACT 13 controls will be used for contamination controls (less than 50,000 dpm beta/gamma and 20 dpm alpha).** • **The asbestos gasket for the ventilation hatchway cover (cover pit) if present will be removed using fixative while a bag is in place over the ventilation hatchway (condenser pit). The plastic will be slowly removed to minimize hatchway access while concurrently a new ventilation hatchway (condenser pit) will be slid onto the pit access next to the plastic and rebolted to the pit. ALARACT 13 controls will be used for contamination guidance and controls (less than 50,000 dpm beta/gamma and 20 dpm alpha). The ventilation hatchway will have a connection so that the 296-P-48 exhauster will be connected to when active retrieval occurs.** **A single set of return and suction lines shall be placed at each tank to the central skid vacuum vessel during retrieval. After each tank is retrieved a small amount of water will be flushed through the line and checked for smearable contamination and dose readings by a Health Physics Technician to ensure minimal contamination is in place in the line. A valve will be closed at the tank surface manifold box, the end of each hose wrapped**		

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		in plastic, and then moved to the next tank for retrieval. Contamination remaining in the lines when moved has been accounted for by including all of the current tank contents in the total retrieval potential-to-emit calculations.		
204.	2, Page 3 of 6 for EU 749	Condition 9 – Create a new Condition 13 for the 2nd sentence relating to HEPA testing and change wording to read 'Each HEPA filter shall be in-place tested annually in accordance with the requirements of ASME AG-1 and shall have a minimum efficiency of 99.95%'.	Make changes as described.	WDOH -
205.	2, Page 1 of 3 for EU 751	• Add the following Emission Unit Information: – Average Stack Effluent Temp: 55 degrees F, 13 degrees C – Average Stack Velocity: 1.91 ft/second, 0.58 m/second • Delete '040(4)' from Abatement Technology. • Add '40 CFR 61' to Monitoring and Testing Requirements.	Make changes as described.	WDOH -
206.	2, Page 1 of 2 for EU 855	• Delete '040(4)' from Abatement Technology. • Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-47. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
207.	2, Page 1 of 2 for EU 856	• Change Abatement Technology to BARCT. Delete '040(4)' from Abatement Technology. • Change the last two sentences in Operational Status to read 'The emission unit may be operated independently or concurrently with emission unit 296-A-46. The emission unit is a primary exhauster ventilation system that operates intermittently or continuously'.	Make changes as described.	WDOH -
208.	2, Page 1 of 4 for EU 878	• Emission Unit Information missing, fill in the blank(s) with "0.00". • Delete '040(4)' from Abatement Technology. • Add '40 CFR 61' to Monitoring and Testing Requirements.	Make changes as described.	WDOH -
209.	2, Page 1 of 4 for EU 885	• Delete '040(4)' from Abatement Technology. • Change Radionuclides Requiring Measurement to read 'Each radionuclide that could contribute greater than 10 percent of the potential TEDE .	Make changes as described.	WDOH -
210.	2, Page 1 of 4 for EU 886	• Delete '040(4)' from Abatement Technology. • Change Radionuclides Requiring Measurement to read 'Each radionuclide that could contribute greater than 10 percent of the potential TEDE .	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
211.	2, Page 1 of 2 and 2 of 2 for EU 894	• Add the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m – Stack Diameter: 0.13 ft 0.04 m – Average Stack Effluent Temp: 55 degrees F – 13 degrees C – Average Stack Velocity: 0.25 ft/second – 0.08 m/second • Delete Condition 2 of AIR 06-624, NOC ID 659 and replace with Condition 3 of AIR 06-503, NOC ID 661. • On Condition 6, two spaces need to be added to separate the last sentence from the previous sentence.	Make changes as described.	WDOH -
212.	2, Page 1 of 1 for EU_ID 910	• Remove space in the emission unit's AEI from between "200" and "E". • Add the following Emission Unit Information: – Average Stack Efffluent Temp: 55 degrees F, 13 degrees C – Average Stack Velocity: 0.00 ft/second, 0.00 m/second	Make changes as described.	WDOH -
213.	2, Page 1 of 3 for EU_ID 912	• The stack temperature is not listed and should be listed as 55 degrees F and 13 degrees C. The stack velocity is incorrect. It should be 1.91 ft/sec. • Delete '040(4)' from Abatement Technology.	Make changes as described.	WDOH -
214.	2, Page 1 of 3 for EU 922	• Remove the duplicated "200E" from the AEI. • Delete '040(4)' from Abatement Technology. • The stack diameter is incorrect. It should be 0.33 ft and 0.10 m as this is a G-1 housing.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
215.	2, Page 1 of 3 for EU 959	• Add to AEI Number "P-244S-002" • Delete '040(4)' from Abatement Technology. • The stack diameter is incorrect. It should be 0.33 ft and 0.10 m as this is a G-1 housing.	Make changes as described.	WDOH -
216.	2, Page 1 of 3 for EU 969	• Add to AEI Number "P-244TX-002" • Delete '040(4)' from Abatement Technology. • The stack diameter is incorrect. It should be 0.33 ft and 0.10 m as this is a G-1 housing.	Make changes as described.	WDOH -
217.	2, Page 1 of 2 for EU 1129	• Add to AEI Number " P-241U301B-001" • Add the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m – Stack Diameter: 0.13 ft 0.04 m – Average Stack Effluent Temp: 55 degrees F – 13 degrees C – Average Stack Velocity: 0.25 ft/second – 0.08 m/second • Delete '040(4)' from Abatement Technology. • Change Operational Status to read 'This emission unit is a passive breather filter that allows the catch tank to vent to the atmosphere under tank farm storage, maintenance and operations. Any activity other than waste transfer support, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a passive breather filter that operated continuously'.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
218.	2, Page 2 of 2 for EU 1129	• APQ missing from Condition 3. The APQ is as follows: – Am-241 1.11 E-09 – Pu-239/240 1.39 E-09 – Sr-90 3.33 E-09 – U-234 3.28 E-10 – U-235 1.28 E-10 – Zn-65 7.77 E-08 • Delete Condition 2 of AIR 06-624, NOC ID 659 and replace with Condition 3 of AIR 06-503, NOC ID 661.	Make changes as described.	WDOH -
219.	2, Page 1 of 2 for EU 1130	• Add to AEI Number " P-241AZ154-001" • Add the following Emission Unit Information: – Stack Height: 5.00 ft 1.50 m – Stack Diameter: 0.13 ft 0.04 m – Average Stack Effluent Temp: 55 degrees F – 13 degrees C – Average Stack Velocity: 0.25 ft/second – 0.08 m/second • Delete '040(4)' from Abatement Technology. • Change Operational Status to read 'This emission unit is a passive breather filter that allows the catch tank to vent to the atmosphere under tank farm storage, maintenance and operations. Any activity other than waste transfer support, maintenance, and normal operations will be regulated and/or permitted under the appropriate regulations and/or permits for the activity being performed and the emission units associated with the activity. The emission unit is a passive breather filter that operated continuously'. • Delete Condition 2 of AIR 06-624, NOC ID	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
		659 and replace with Condition 3 of AIR 06-503, NOC ID 661.		
220.	2, Page 2 of 2 for EU 1130	• APQ missing from Condition 3. The APQ is as follows: – Alpha-0 1.99 E-11 – Beta-0 5.30 E-10 – Gamma-0 5.07 E-10	Make changes as described.	WDOH -
221.	2, Table 2-1	Delete the page # 63 from the cover page for Table 2.1.	Make changes as described.	WDOH -
222.	2, Table 2-1, Page 1	• Change the 2nd sentence in the heading to read "See Section 5.0, **General Conditions** of this license for a description of monitoring and reporting requirements." • Delete 200-E-120 and 216-A-40 from Table 2.1, because they are not part of the diffuse and fugitive list submitted to WDOH as agreed upon.	Make changes as described.	WDOH -
223.	2, ALARACT-Global	Double space after all numbered headings.	Make changes as described.	WDOH -
224.	2, Pg. 1 of 2 ALARACT_ID 1	In the 7th ¶, italicize 'Containment Selection Guide, Attachment A'.	Make changes as described.	WDOH -
225.	2, Pg. 2 of 2 ALARACT_ID 1	• In 2.e. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. • In 3.b italicize 'Tank Farms Radiological Control Manual'. • In 4.c. the word "report's" should be "report(s)".	Make changes as described.	WDOH -
226.	2, Pg. 2 of 3 ALARACT_ID 2	In 2.d delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard.	Make changes as described.	WDOH -
227.	2, Pg. 2 of 3 ALARACT_ID 2	In 2.i italicize 'Containment Selection Guide, Attachment A'	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
228.	2, Pg. 2 of 3 ALARACT_ID 2	In 3.b italicize 'Tank Farms Radiological Control Manual'	Make changes as described.	WDOH -
229.	2, Pg. 3 of 3 ALARACT_ID 2	In 5.a ")" needs to be added after the word "impact".	Make changes as described.	WDOH -
230.	2, Pg. 1 of 2 ALARACT_ID 3	In 2.d. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard.	Make changes as described.	WDOH -
231.	2, Pg. 2 of 2 ALARACT_ID 3	In 3.b italicize 'Tank Farms Radiological Control Manual'	Make changes as described.	WDOH -
232.	2, Pg. 1 of 1 ALARACT_ID 4	In 2.b italicize 'Tank Farms Radiological Control Manual'	Make changes as described.	WDOH -
233.	2, Pg. 1 of 1 ALARACT_ID 4	• In 3.b. italicize 'Tank Farms Radiological Control Manual' • Delete the extra ")" at the end of 4.a. • Add a ")" at the end of 6.a.	Make changes as described.	WDOH -
234.	2, Pg. 1 of 2 ALARACT_ID 5	• The alpha numeric bullets restart after "d." when they should continue with "e." Re-letter section 2 "a-h, with h having the next 4 paragraphs as subparagraphs, and followed by i, and j." • In 2.e. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard.	Make changes as described.	WDOH -
235.	2, Pg. 2 of 2 ALARACT_ID 5	• In 2.k. change font to bold italic (new 2.i) • Change Delete 'k to i.' and 'l to j.' from last two paragraphs In 4.c. and 5. a. add a ")" to the end of the word(s). • In 6.a add an "s" to the word "facilitie". • 3.b. needs to have an "l" added to the word "manua" • In 3.b. italicize 'Tank Farms Radiological Control Manual'	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
236.	2, Pg 1 of 3 ALARACT_ID 6	In the paragraph titled "DECONTAMINATION" the 4th sentence, which begins "The pit covers are lifted and contained…." Needs to have the alpha value changed to 70 dpm/100cm2.	Make changes as described.	WDOH -
237.	2, Pg. 2 of 3 ALARACT_ID 6	• In 2.d. the alpha value needs to be changed to 70 dpm/100cm2 • In 2.f. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. • In 2.h. italicize 'Containment Selection Guide, Attachment A' • In 3.b. italicize 'Tank Farms Radiological Control Manual' • In 4. c. add a ")" to the end of the word.	Make changes as described.	WDOH -
238.	2, Pg. 1 of 2 ALARACT_ID 7	• In 1, second paragraph, the terminology is in question is "top hat" the same as "riser adapter" as stated in HNF-4327, Rev 3? • In 1, italicize 'Containment Selection Guide, Attachment A'	Make changes as described.	WDOH -
239.	2, Pg. 2 of 2 ALARACT_ID 7	• In 2.e. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. • In 2.j. italicize 'Containment Selection Guide, Attachment A' • In 3.b. italicize 'Tank Farms Radiological Control Manual' • In 4. c. add a ")" to the end of the word.	Make changes as described.	WDOH -
240.	2, Pg. 2 of 2 ALARACT_ID 8	• In 3.b. italicize 'Tank Farms Radiological Control Manual' • Change "manua" to "manual" at the end of 3. b. • Change "report(s" to "report(s)' at the end of 4. c. • In 6.a. remove one space between All and Tank	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
241.	2, Pg. 1 of 2 ALARACT_ID 10	• Change 1.C) to lower case • In 2.a. italicize 'Containment Selection Guide, Attachment A' • In 2.b. italicize 'Containment Selection Guide, Attachment A'	Make changes as described.	WDOH -
242.	2, Pg. 2 of 2 ALARACT_ID 10	• In 4. c. add a ")" to the end of the word. • 3.b. needs to have an "l" added to the word "manua" • In 3.b. italicize 'Tank Farms Radiological Control Manual' • In 2.g. italicize 'Containment Selection Guide, Attachment A'	Make changes as described.	WDOH -
243.	2, Pg. 1 of 2 ALARACT_ID 11	• On 2.g. a ")" needs to be added to the end of the word • In 3.a. italicize 'Tank Farms Radiological Control Manual' • On 3.c. a ")" needs to be added to the end of the word	Make changes as described.	WDOH -
244.	2, Pg. 2 of 2 ALARACT_ID 11	• On number 4 d, a ")" needs to be added to "report(s" • On number 6, an "s" needs to be added to the word "Facilitie".	Make changes as described.	WDOH -
245.	2, Pg. 1 of 1 ALARACT_ID 12	• In 3.b. italicize 'Tank Farms Radiological Control Manual' • An "l" needs to be added to the end of "Manua" on 2.a. and 3.b. • On 4.b. a ")" needs to be added to the end of the word. • In 6.a add an "s" to the word "facilitie".	Make changes as described.	WDOH -
246.	2, Pg. 1 of 2 ALARACT_ID 13	• Remove "and use of the LDUA" from the first sentence in the description and remove the apostrophe after "pumps" and replace with a "." • In 1., 6th ¶, italicize 'Containment Selection Guide, Attachment A'	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
247.	2, Pg. 2 of 2 ALARACT_ID 13	• In 2.g add 'when >50,000 dpm/100cm2 beta/gamma and/or 70 dpm/100 cm2 alpha.' To the end of the sentence • On 2.h. the alpha limit needs to be changed to 70 dpm/100cm2. • On 2.j. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. • In 2.k. italicize 'Containment Selection Guide, Attachment A' • On 3.b. italicize 'Tank Farms Radiological Control Manual' and an "l" needs to be added to the word "Manua". • In 4. c. add a ")" to the end of the word. • In 6.a add an "s" to the word "facilitie".	Make changes as described.	WDOH -
248.	2, Pg. 1 of 3 ALARACT_ID 14	• In 1. underline 'Jumper Work' and 'Pressure Testing Lines' • In the description section, the paragraph starting with "Swipes of the splash guard will be taken…" needs to have the alpha value changed to 70 dpm/100cm2.	Make changes as described.	WDOH -
249.	2, Pg. 2 of 3 ALARACT_ID 14	• 2. f. needs to have the alpha value changed to 70 dpm/100cm2. • Create a new paragraph with 'Note: The fixative… • 2. h. needs to have the alpha value changed to 70 dpm/100cm2. • 2. j. delete the word "JCS" from the last sentence. The JCS system is no longer used and "work record" is the standard. • 2. k. needs to have a "t" added to the word "permi" • 3. b. needs to have an "l" added to the word "manua" • In 3.b. italicize 'Tank Farms Radiological Control Manual' • In 4. c. add a ")" to the end of the word.	Make changes as described.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
250.	2, Pg. 1 of 1 ALARACT_ID 15	• In 1. italicize 'Containment Selection Guide, Attachment A' • In 2.b. italicize 'Containment Selection Guide, Attachment A' • In 3.b. italicize 'Tank Farms Radiological Control Manual' • 3. b. needs to have an "l" added to the word "manua" • In 4. c. add a ")" to the end of the word. • In 6.a add an "s" to the word "facilitie".	Make changes as described.	WDOH -
251.	2, Pg. 1 of 1 ALARACT_ID 16	• In 2.b. italicize 'Containment Selection Guide, Attachment A' • 2. c. needs to have a "t" added to the word "permi" • In 3.b. italicize 'Tank Farms Radiological Control Manual' • 3. b. needs to have an "l" added to the word "manua" • In 4. b. add a ")" to the end of the word. • In 6.a add an "s" to the word "facilitie".	Make changes as described.	WDOH -
252.	2, Pg. 1 of 1 ALARACT_ID 29	• In 1, italicize 'Containment Selection Guide, Attachment A' • In 2. italicize 'Containment Selection Guide, Attachment A' • Change the section 2 subparagraphs to a and b to be consistent within the ALARACTs listed in the license • In 3, italicize 'Tank Farms Radiological Control Manual'	Make changes as described.	WDOH -
253.	2, Pg. 1 of 1 ALARACT_ID 30	• In 1, italicize 'Containment Selection Guide, Attachment A' • In 2. italicize 'Containment Selection Guide, Attachment A' • In 3, italicize 'Tank Farms Radiological Control Manual'	Make changes as described.	WDOH -
254.	2, Page 2 of 2 for EU_ID 473	NOC_ID 662, Condition 3, PTE is stated as 6.06E-03 mrem/year.	Change PTE from 6.06E-03 to 6.1E-03.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
255.	2, Page 2 of 2 for EU_ID 473	NOC_ID 662, Condition 5, is incomplete.	Add to the beginning of the condition "The radioactive isotopes identified for this emission unit represent all of the radionuclides historically present for the . . . "	WDOH -
256.	2, Page 1 of 3 for EU_ID 461	NOC_ID 654, Condition 2, paragraph 7.	Add after . . . generally by forklift to the assigned facility "/area. Alternatively, waste packages may be received, inspected and unloaded at the specific facility/area where the waste will be stored."	WDOH -
257.	2, Page 1 of 3 for EU_ID 439	NOC_ID 654, Condition 2, paragraph 7.	Add after . . . generally by forklift to the assigned facility "/area. Alternatively, waste packages may be received, inspected and unloaded at the specific facility/area where the waste will be stored."	WDOH -
258.	2, Page 2 of 3 for EU_ID 439	NOC_ID 654, Condition 3, line 3, WAC 246-247-030(21)(e)	Change "WAC 246-247-030(21)(e)" to " WAC 246-247-030(21)(e) or (a)".	WDOH -
259.	2, Page 52 of 87 for EU_ID 486	NOC_ID 700, Condition 3, reference to "See condition 19"	Change all instances of "See condition 19" to "See condition 18" (occurs 6 times).	WDOH -
260.	2, Page 1 of 1 for EU_ID 210	Emission Unit ID 210 (296-P-31 Stack) 209-E Building: the stack has not been shown to be a “Major” stack	• Change the classification of the stack to a “Minor” stack; • change the Federal and State Regulatory reference from WAC 246-247-075(2) to WAC 246-247-075(3); • change Method 114 to Method 114(3); • change the Radionuclides Requiring Measurement to TOTAL ALPHA, TOTAL BETA; and • - change the Sampling Frequency from Continuous to 4 week sample/yr	WDOH -
261.	2, Page 1 of 1 for EU_ID 369	291-A-1, under Operational Status, second sentence, the parenthetical statement, “cells A through M” is misleading.	Delete the parenthetical statement, “cells A through M”	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
262.	2, Page 1 of 2 for EU_ID 402	296-B-1, Condition 2, the first part of the paragraph, "Installation of exhaust ductwork, installation of air clean-up train equip, and fans, installation of a new exhaust stack, isolation & ventilation of existing filter banks, isolation of existing stack & exhaust fans, and" is not longer applicable and the condition does not include conducting S&M activities.	Delete the first part of the paragraph, "Installation of exhaust ductwork, installation of air clean-up train equip, and fans, installation of a new exhaust stack, isolation & ventilation of existing filter banks, isolation of existing stack & exhaust fans, and" and change the paragraph to read "Operate the installed ventilation systems and conduct S&M activities".	WDOH -
263.	2, Page 1 and 2 of 2 for EU_ID 404	The emission unit (Emission Unit ID 404, 296-B-2 Vent) has been closed as a point source. Please respond to the email [M. Jarvis, DOE-RL to J. Schmidt, WDOH, dtd. 8/9/2006, "Closure Information Regarding the 296-B-2 Vent (B-Plant)].	Remove the emission unit from the permit. If this is not done, several of the conditions need to be updated to reflect the current status.	WDOH -
264.	2, Page 3 and 4 of 10 for EU_ID 447 Page 4 and 5 of 6 for EU_ID 455 Page 5 and 6 of 23 for EU_ID 476 Page 9 and 10 of 87 for EU_ID 486	Roof Replacement Activities, NOC ID 670, all the sections are identical except for the PTE numbers and Condition 6.	Identify what the different sections apply to. In the previous set of C&Ls, one set was for the PTRAEU, another for the guzzler, another for the HEPA Vac and one for D&F. There is no way to distinguish them for these sheets. - Suggest combining the four sections and make a condition 3a) for the PTRAEU with its PTE; 3b) for the Guzzler with its PTE; 3c) for the HEPA Vac with its PTE; and 3d) for D&F with its PTE.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
265.	2, SOB	FF-01 Change Process: Starting with the recent issued/accepted FF-01, please describe the basis process WDOH will use to maintain a living license and issue revisions either in conjunction with the AOP or in close timing (e.g., if the AOP Renewal is issued in 12/06 and effective 1/07, would WDOH's FF-01rev1 be concurrently effective to make the 5 year life match that for the AOP pursuant to WAC 173-401)	Request addition of clarifying text outlining the sequencing of revision and interface of FF-01 revisions as a living license with respect to AOP revision issuances during the course of the 5 year life of the permit/license.	WDOH -
266.	2, SOB	The AOP determination key (Ecology Standard Terms and General Conditions, SOB, Appendix D) already defines a process for utilizing forms pursuant to WAC 173-401-720 thru 725. For clarification purposes in processing modification requests generated from license approvals and other environmental documentation issued by WDOH, please provide WDOH clarification for use of this key with specific FF-01 license examples.	Request WDOH to provide an interface between FF-01 and STGC, Appendix D to specify example FF-01 environmental documents that trigger, for example, a Change Not Requiring Permit Revision (CNRPR) form, which are administrative amendments, and those that would trigger an off-permit change. In addition, a clarification for the general user that AOP changes, other than significant modifications, would be in effect immediately following approval and DOE acceptance	WDOH -
267.	2, SOB, Section 5.0	The Obsolete Date for EUID 197, 305 B Building is incorrect.	Change date to 7/20/2006	WDOH -
268.	2, SOB, Section 5.0	The Obsolete Date for EUID 307, EP-3020-01-S is incorrect.	Change date to 12/28/2004	WDOH -
269.	2, SOB, Section 5.0	The Obsolete Date for EUID 348, 306 W-03-V is incorrect.	Change date to 12/28/2004	WDOH -
270.	2, SOB, Section 5.0	The Obsolete Date for EUID 419, EP-3720-01-S is incorrect.	Change date to 7/21/2004	WDOH -
271.	2, SOB, Section 6.0	The Obsolete Date for EUID 197, 305 B Building is incorrect.	Change date to 7/20/2006	WDOH -
272.	2, SOB, Section 6.0	The Obsolete Date for EUID 412, 331 Building, NOC ID 143 is incorrect.	Change date to 2/14/2002	WDOH -
273.	2, SOB, Section 6.0	Under EUID 412, the NOC ID 158 is not associated with this emission unit.	Delete all information associated with NOC ID 158 under EUID 412.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
274.	2, SOB, Section 6.0	EUID 509 is missing for emission unit EP-331-02-S, 331 Building.	Please add EUID 509 for the EP-331-02-S emission unit at the 331 Building to this section. It includes: • NOC ID 95, Project Title: Radon Generator, Obsoleted on 12/30/2002 (Permit Number AIR 95-803) and, • NOC ID 158, Project Title: Radon Generator – Location Change, Obsoleted on 12/30/2002 (Permit Number AIR 96-506)	WDOH -
275.	2, SOB, Page 4 of 15	WDOH statement of basis, first paragraph second sentence, there is an extra period at the end of the sentence.	Make changes as described.	WDOH -
276.	2, SOB, Page 4 of 15	Last paragraph, first sentence, the use of a three digit number has been updated now to a four digit number.	Make changes as described.	WDOH -
277.	2, SOB, Page 5 of 15	Add a note just above section 4.0 ALARACT Agreements, the note should be as follows; "NOTE: The original process of generating an AEI is listed in the original AOP application, Chapter 1, General Information and is the responsibility of the permittee to maintain and assign these number to emission units."	Make changes as described.	WDOH -
278.	2, SOB, Page 5 of 15	Consider the deletion of ALARACT 2, since the rotary mode core sampler exhausters emission units and NOCs have been closed.	Make changes as described.	WDOH -
279.	2, SOB, Page 7 of 15	FH needs to clarify if the emission unit 560 Decontamination Trailers for the site was to listed as a obsolete emission unit, or is the emission unit still active and in use?	Make changes as described.	WDOH -
280.	2, SOB, Page 7 of 15, Obsolete Emission Units	EU ID 184, RCF-2-EX. The emission unit became obsolete upon approval of the new FF-01 License.	Change the obsolete date to the date FF-01 became effective	WDOH -
281.	2, SOB, Page 8 of 15, Obsolete Approvals	Approvals that were obsolete with the issuance of the new license are not listed in this section.	Include approvals that become obsolete with the issuance of the new FF-01 license.	WDOH -

Comment No.	Attachment & Section	Comment/Discrepancy(s)/Basis	Recommendation	Agency Disposition
282.	3, SOB, Page 1 of 16	In the BCAA statement of basis the clarification of points of contacts was added as requested. In the final review it is being asked if the names of the individuals could be deleted and only the position title be used, including the deletion of the phone number and just leave it as Program Manager and Engineer of the Department of Ecology Nuclear Waste Program Office in Richland WA.	Make changes as described.	BCAA -

AEI = Air Emissions Inventory
ALARACT = as low as reasonably achievable control technology
AOP = Air Operating Permit
APQ = annual possession quantity
AR = Administrative Record
ARAR = applicable or relevant and appropriate requirements
ASIL = acceptable source impact level
ATT = Attachment
BARCT = best available radionuclide control technology
BCAA = Benton Clean Air Authority
BPA = Bonneville Power Administration
C&L = Conditions and Limitations
CAA = *Clean Air Act*
CERCLA = *Comprehensive Environmental Response, Compensation, and Liability Act of 1980*
CFR = Code of Federal Regulations
CNRR = Changes Not Requiring a Permit Revision (Process)
D&F = diffuse and fugitive
DOE = U.S. Department of Energy
DST = double-shell tank
Ecology = Washington State Department of Ecology
EPA = U.S. Environmental Protection Agency
EU = emission unit
GEMS = Generic Effluent Monitoring System
HEPA = high-efficiency particulate air
ID = identifier/identification
MEI = maximally exposed individual
NOC = notice of construction
NOT = notice of transition
PTE = potential to emit
PTRAEU = portable/temporary air emission units
QA = quality assurance
SOB = Statement of Basis
SST = single-shell tank
STGC = Standard Terms and General Conditions
SWIT = Solid Waste Information and Tracking System
TEDE = total effective dose equivalent
Tri-Party Agreement = *Hanford Federal Facility Agreement and Consent Order*
WAC = Washington Administrative Code
WCH = Washington Closure Hanford, LLC
WDOH = Washington State Department of Health

AOP COMMENT RECORD FORM

Document Title: 2006 Air Operating Permit Renewal - "Draft Permit" Review

Reviewer: J. M. Barnett | **Company/Organization: PNNL**

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
1	2, Statement of Basis – Section 5.0	The Obsolete Date for EUID 197, 305 B Building is incorrect.	Change date to 7/20/2006	
2		The Obsolete Date for EUID 307, EP-3020-01-S is incorrect.	Change date to 12/28/2004	
3		The Obsolete Date for EUID 348, 306 W-03-V is incorrect.	Change date to 12/28/2004	
4		The Obsolete Date for EUID 419, EP-3720-01-S is incorrect.	Change date to 7/21/2004	
5	2, Statement of Basis – Section 6.0	The Obsolete Date for EUID 197, 305 B Building is incorrect.	Change date to 7/20/2006	
6		The Obsolete Date for EUID 412, 331 Building, NOC ID 143 is incorrect.	Change date to 2/14/2002	
7		Under EUID 412, the NOC ID 158 is not associated with this emission unit.	Delete all information associated with NOC ID 158 under EUID 412.	
8		EUID 509 is missing for emission unit EP-331-02-S, 331 Building.	Please add EUID 509 for the EP-331-02-S emission unit at the 331 Building to this section. It includes: • NOC ID 95, Project Title: Radon Generator, Obsoleted on 12/30/2002 (Permit Number AIR 95-803) and, • NOC ID 158, Project Title: Radon Generator – Location Change, Obsoleted on 12/30/2002 IPermit Number AIR 96-506)	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
9	2 (WDOH), EU_ID 175	For the 318 Building, EUID 175 the action under Condition 2, Paragraph 2 to install a single stage HEPA filter into the exhaust flow duct in Room 126 has been completed.	Recommend removing this paragraph from the permit.	

Central Files Air
File Name: AOP
Cross Reference:

RECEIVED
JUL 28 2006
Department of Ecology
NWP - Richland

July 28, 2006

Dr. Oliver Wang
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

Dear Dr. Wang:

COMMENTS ON THE DRAFT HANFORD SITE AIR OPERATING PERMIT

Attached are my comments on the Draft Hanford Site Air Operating Permit (AOP).

I have lived and worked in Richland, Washington, and surrounding area for nearly 2 decades. During a portion of that time I became familiar with the Hanford Site AOP. I am now retired, but wish to remain involved in the AOP and AOP issues as a private citizen.

Additionally, I wish to be placed on the mailing list, maintained in accordance with WAC 173-401-920 (1)(c).

Thank you for the chance to provide comments. I certainly appreciate the opportunity to participate in the public review process. Hopefully you will find my comments beneficial in crafting the proposed AOP.

Sincerely,

Bill Green
424 Shoreline Ct.
Richland, WA 99354

Attachment

August 05, 2006

Oliver,

Here are four additional comments on the draft Hanford Site Air Operating Permit.

These comments are being submitted on August 5, 2006, which is within the advertised 30-day comment period, July 10 through August 11, 2006.

All 4 comments relate to the "HANFORD SITE AIR OPERATING PERMIT 2006 RENEWAL (Standard Terms and Conditions)" portion of the draft AOP, unless otherwise specified.

Bill Green

****
Additional Draft AOP Comments

1. Page 20 of 30; Section 4.3.4 Annual Compliance Certification
Comment: Return the due date for the annual compliance certification report to July 2. Slipping the due date from July 2 to July 31 is inconsistent with 40 CFR 70.6(c)(5)(i).

Discussion:
With regard to submittal frequency for the compliance certification report, 40 CFR 70.6(c)(5) and 70.6(c)(5)(i) state, in part "*Requirements for compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. Permits shall include each of the following: (i) The frequency (not less than annually or such more frequent periods as specified in the applicable requirement or by the permitting authority) of submissions of compliance certifications*".

By slipping the due date even a few days (29) beyond annual, Ecology has inappropriately used this AOP to create a condition that is less strict than the underlying federal requirement. See 40 CFR 70.10(b) "*(b) State failure to administer or enforce. Any State program approved by the Administrator shall at all times be conducted in accordance with the requirements of this part* [40 CFR 70] …"

2. Page 20 of 30; Section 4.3.4 Annual Compliance Certification
Comment: Define "Source" or delete the term from this Section and the remainder of the AOP. A definition of "source" does not appear in 40 CFR 70, in 40 CFR 61, Subparts A or H, in WAC 173-401, or in WAC 246-247. It makes a difference whether "source" is an emission unit or the Hanford stationary source (or major stationary source) or affected source, or something different.

3. Page 20 of 30; Section 4.3.4 Annual Compliance Certification and elsewhere
Comment: Provide a regulatory citation for each term or condition as required by

WAC 173-401-600(2) and 40 CFR 70.6(a)(1)(i). Several individual conditions lack such a citation, including Section 4.3.4.

4. Page 12 of 30; Section 3.6 Permit Fees; See this commenter's comment 13 submitted on July 28, 2006
Comment: Rewrite this section to be consistent with 40 CFR 70.9. Specifically address the requirement that "*…annual fees, or the equivalent over some other period, ...are sufficient to cover the permit program costs and shall ensure that any fee required by this section* [40 CFR 70.9] *will be used solely for permit program costs...*"

Oliver,

Here's another 2 comments.

Bill Green
****

1. Attachment 2 Page 442; Emission Unit ID: 448; Hanford Sitewide
Sitewide
Vented Containers
(editorial) Comment: Remove one "Sitewide" so the emission unit reads:
"Hanford Sitewide Vented Containers"

2. Attachment 2 Page 442; Emission Unit ID: 448; Hanford Sitewide
Sitewide
Vented Containers
Comment: Change "This is a MINOR, ACTIVELY ventilated emission unit."
to
"This is a MINOR, PASSIVELY ventilated emission unit."
Discussion: Vented containers are passively ventilated, not actively
ventilated.

Comments: Statement of Basis For Hanford Site Air Operating Permit No. 00-05-006 2006 Renewal, State of Washington Department of Ecology. State of Washington Department of Health, Benton Clean Air Authority
(SOB for Standard Terms and Conditions)

1. Page 2 of 59; Definition of Permitting Authority:
Comment: The term "Permitting Authority" has a regulatory definition [see WAC 173-401-200(23)]. Either chose a different term that is not defined by regulation or replace the definition of "Permitting Authority" on page 2 with the definition contained in WAC 173-401-200(23). The regulatory definition reads,

> *' "Permitting authority" means the department of ecology, local air authority, or other agency authorized under RCW 70.94.161 (3)(b) and approved by EPA to carry out a permit program under this chapter.'*

Discussion:
Ecology is the single "permitting authority", as defined by WAC 173-401-200(23) for the Hanford Site AOP.

Additionally, Ecology is not free to use an AOP or supporting documentation to create or modify a regulation.

2. Page 10 of 59; "**Pacific EcoSolution Corporation, Richland Facility"**
Comment: a) Update this paragraph as the information appears to be several years old. Specifically address the financial relationship between DOE and Pacific EcoSolution Corporation (PEcoS). Also consider the current regulatory impact on the ability of PEcoS to secure business unrelated to DOE. Then reevaluate PEcoS as a support facility.
b) Create a public review file containing all information used in the re-evaluation of PEcoS as a Hanford Site AOP support facility.

Discussion:
It is my understanding the percentage of PEcoS service output provided to DOE is far closer to 100%, as opposed to less than 50%, as stated. I also understand PEcoS could not exist as a company without DOE as a customer.

I further understand PEcoS could not reasonably find other customers in today's regulatory climate.

By controlling the financial relationship, DOE in effect controls PEcoS. PEcoS should therefore be considered a support facility and should be included in the AOP.

During public review for the dangerous waste permit ATG (now PEcoS), it was revealed the process used at PEcoS was developed across the highway at Hanford. While a laboratory-scale test of the process was conducted no pilot-scale test ever occurred. Rather, the first commercial installation at ATG (now PEcoS) also served as the pilot test. This pilot test was apparently accompanied by contract(s) for work from DOE's Hanford Site.

The dangerous waste permitting process did include public review. However, granting of the radioactive license proceeded without public review. What the license approved was a flawed operation where the plant process controls were located immediately under the melting tank. When the melting tank failed, resulting in a 1500 gallon spill of radioactive material, the plant process controls were also radioactively contaminated.

The permitting authority needs to provide complete and accurate information to support their claim PEcoS should be excluded from Hanford's AOP. Absent such information, the public review process is meaningless.

3. Page 12 of 59; Livingston Rebuild Center, Inc.

Comment: Remove Livingston Rebuild Center, Inc. This commenter understands they are no longer in business. Tri City Railroad Co. now occupies that space.

4. Page 12 of 59; All Port of Benton Facilities.

Comment: Limit the Port of Benton Facilities to only those tenants that can not be considered support facilities. Include Bechtel's lay-down yard in the AOP.

Discussion:

One of the tenants of the Port of Benton Industrial Park is Bechtel's Vitrification Plant receiving area (located in the 1171 building) and their lay-down yard, which occupies a large portion of the former Hanford 1100 Area. This commenter believes BCAA has written at least one citation for fugitive dust emanating from Bechtel's lay-down yard.

This lay-down yard is adjacent to the Hanford Site (across a highway/road from the Hanford 3000 Area). It exists totally to support a DOE funded Hanford Site project. It is a demonstrated source of fugitive dust with a poor compliance history. Lastly, it is very likely to remain active until 2019, when construction of the vitrification plant is expected to be complete (Annette Cary, "*Estimated cost of Hanford's vitrification plant may increase*", Tri-City Herald, July 18, 2006).

5. (editorial) Page 21 of 59; Subsection 5.2 "**Subsection 5.2** on *Inapplicable Requirements* describes how some requirements are not subject to certain requirements."

Please edit this sentence. As is, it makes no sense.

6. Page 34, 35 and 36 of 59; The paragraph that reads:

> "WDOH has been provided comments under the FF-01 license comments on the latest list. WDOH has decided to only include NOCs that were obsolete for the time period representing the orginal time period of July 2001 through present time. Ecology needs to contact WDOH to obtain a word or electronic version since their review consisted of PDF files only."

Comment: This paragraph indicates the document is not complete. Provide a complete copy of this SOB for public review and restart the 30 day public review and comment period.

Discussion:
According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis (SOB) "… *sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions).*"

40 CFR 70.7(a)(5) further states *"…The permitting authority shall send this statement [of basis] to…any other person who requests it.* This commenter requested an electronic copy of the SOB from Ecology, the permitting authority, for the purpose of participating in the public review and comment process as allowed by 40 CFR 70.7(h) and WAC 173-401-800. What Ecology supplied was a SOB Ecology acknowledged as being incomplete.

In addition WAC 173-800(2)(e) states, in part "[T]*the permitting authority must make available for public inspection, in at least one location near the chapter 401 source, all nonproprietary information contained in the permit application, draft permit and* ***supporting materials*** (emphasis added)." Documentation that provides the "*legal and factual basis for the draft permit conditions"* most certainly qualifies as "*supporting material*".

Conduct of public review is certainly hampered when the agency knowingly provides incomplete "*supporting material"* that describes the "*legal and factual basis for the draft permit conditions* ".

Comments: Statement of Basis For Attachment 2: Department of Health Hanford Site License FF-01

7. General comment. Include the 2 legally binding settlement agreements between DOE/RL and Health.

Discussion:
According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… *sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions).*" Conspicuously missing from this Statement of Basis are the 2 legally binding agreements between DOE/RL and Health. These agreements formally established the content of many of the Notice of Construction approval conditions.

8. General comment. Include the memorandum of understanding between Ecology and Health.

Discussion:
According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… *sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions).*" Missing from this Statement of Basis is the agreement between Ecology and Health that establishes each agency's responsibilities with regard to the Hanford Site AOP. This MOU significantly impacts structure of the AOP, and subsequent administration and enforcement.

Comments: Hanford Site Air Operating Permit 2006 Renewal
(Standard Terms and Conditions)

9. Page 1 of 30; 6th paragraph; 1st sentence "The regulatory agency relationships are described in the Statement of Basis (Statement)"

Comment: Include in the Statement of Basis the "MEMORANDUM OF UNDERSTANDING Between the Washington State Department of Ecology and the Washington State Department of Health Related to the RESPECTIVE ROLES AND RESPONSIBILITIES OF THE TWO AGENCIES IN COORDINATING ACTIVITIES CONCERNING HANFORD SITE RADIOACTIVE AIR EMISSIONS" signed by Ecology and Health in 2005. Also include the "MEMORANDUM OF UNDERSTANDING BETWEEN THE U.S. ENVIRONMENTAL PROTECTION AGENCY AND THE U.S. DEPARTMENT OF ENERGY concerning THE CLEAN AIR ACT EMISSION STANDARDS FOR RADIONUCLIDES 40 CFR PART 61 INCLUDING SUNPARTS H, I, Q & T", signed by EPA in 1994 and by DOE in 1995.

Discussion:
According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… *sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)*." Missing from this Statement of Basis is the agreement between Ecology and Health that establishes each agency's responsibilities with regard to the Hanford Site AOP. As stated in the MOU "*The purpose of this MOU is to clarify the respective roles of Health and Ecology in the issuance and administration of air operating permits…*" This MOU significantly impacts structure of the AOP, and subsequent administration and enforcement. This document should certainly be included in the AOP.

The EPA-DOE MOU represents a "*…mutual effort to clarify provisions of 40 CFR Part 61, Subpart H, I, Q, and T, National Emissions Standards for Hazardous Air Pollutants (NESHAP) promulgated under the Clean Air Act (CAA) for radionuclide emissions from DOE facilities. This effort has been undertaken to assure uniform and consistent interpretation of the NESHAP provisions for radionuclides at DOE facilities and EPA regional offices…*"

It is difficult to see how the requirements of WAC 173-401-700(8) and 40 CFR 70.7(a)(5) can be satisfied without including both of these MOUs.

10. Page 10 of 30; listing of Pacific EcoSolution Corporation, Richland facility as excluded at the time of AOP renewal in 2006.

Comment: See comment #2 above. Reevaluate PEcoS for inclusion in the AOP based on current information. Specifically address the financial relationship between DOE and Pacific EcoSolution Corporation (PEcoS), and the realistic ability of PEcoS to secure business independent of DOE given the current regulatory restrictions.

Discussion:
The decision to exclude PEcoS needs to be based on accurate operational and business information, regulation and established regulatory precedents.

11. Page 10 of 30; listing of all Port of Benton facilities as excluded at the time of AOP renewal in 2006.

Comment: See comment #4 above. Limit the Port of Benton Facilities to only those tenants that can not be considered Hanford Site AOP support facilities.

12. Page 10 of 30; listing of Livingston Rebuild Center, Inc as excluded at the time of AOP renewal in 2006.

Comment: See comment #3.

13. Page 12 of 30; Section 3.6 Permit Fees

Comment: Add a paragraph to this section stating fee process implemented for the entire AOP is consistent with Part X of the Operating Permit Regulation [WAC 173-401-900], thereby acknowledging public review opportunities guaranteed by regulation for this entire AOP.

As written, this paragraph strongly suggests WAC 173-401-900 only applies to AOP Attachment 1 rather than the entire AOP. Therefore limiting public review of fee process information to only AOP Attachment 1.

Discussion:

A review opportunity for the draft workload analysis, draft budget and fee schedule is provided by WAC 173-401-920(1)(c). This paragraph states in part:

"…*Ecology shall make available for public review, on or before February 28 of each even-numbered year, copies of its draft biennial workload analysis and draft biennial budget. Ecology shall make available for public review, on or before October 31 of each year, copies of its annual fee schedule.* …"

Ecology is the single permitting authority [WAC 173-401-200(23)] for the AOP. The radioactive license portion of the AOP is administered by the Health through a revised MOU signed by both agencies in 2005. Asbestos and open burning provisions are administered by BCAA through a delegation letter from Ecology.

According to the MOU, "…*Ecology's permit program costs will include permit administration costs and development and oversight costs associated with Health's regulatory activities...*"

Administration costs and development and oversight costs associated with BCAA's AOP regulatory activities are not addressed. However, payments for Regulation 1 activities are addressed in a 2003 MOA with DOE.

While Ecology is free to enter into interagency agreements, Ecology is not free to ignore regulation, in this case WAC 173-401-900. Ecology is also not free to use an AOP or an interagency agreement to create or modify regulation or, in any way, limit public participation granted by regulation.

Ecology is the permitting authority [WAC 173-401-200(23)], and therefore ultimately responsible for everything in the permit. The AOP is issued by Ecology pursuant to the Operating Permit Regulation, WAC 173-401 (i.e., the AOP was not issued under WAC 246-247

or any other state regulation). The Operating Permit Regulation includes fee determination requirements (WAC 173-401-900), which apply to the entire AOP through Ecology, the permitting authority, to any state agency for AOP work performed by that agency. Therefore, fee process implemented for the entire AOP should be consistent with the Operating Permit Regulation.

[This issue is focused only on agency fee process for activities regulated by WAC 173-401. Agency costs (e.g., administration costs, development costs, oversight costs, etc.) for activities outside the AOP are beyond the scope of this comment.]

14. General comment on Statements of Basis: Package all 4 Statements of Basis in a single document. It makes no sense to have 4 separate SOBs for 1 AOP.

Comments: Attachment 1

15. Table 1.1, pages ATT 1-6 through 1-8, and Table 1.7, pages ATT 1-85 & 86.
Comment: See comment 4. Because of its adverse compliance history, anticipated longevity, and direct association with a Hanford Site PSD source, the Bechtel Vitrification Plant lay-down yard in the former Hanford 1100 Area should be mentioned as a distinct source of fugitive dust.

16. Page ATT 1-7, Table 1.1, top entry for some Emission Units associated with 3020.
Comment: Either provide Table 1.6 requirements for 3020-07, 08, & 09-S or correct Table 1.1.

Discussion:
Certain 3020 emission units are shown as having requirements in Table 1.6. No such Table 1.6 requirements were found.

17. Page ATT 1-10 through ATT 1-12; Table 1.2.
Comment: Explain the basis for federal enforceability of RACT (WAC 173-400-040). Perhaps this could be done via footnote.

18. Page ATT 1-22 and 23 ; Table 1.6; Integrated Disposal Facility (IDF)
Comment: Either supply an NOC approval order or delete this emission unit from Table 1.6.

Discussion:
The title of Table 1.6 is: "*Emission Limits and Periodic Monitoring Requirements for Emission Units with NOC Approval Conditions.*" According to the 1st paragraph on page ATT 1-21 "*The emission units identified in this table [Table 1.6] are those emission units that have received an Ecology approval order to operate under WAC 173-400-110 New Source Review and/or WAC 173-460-040.*" It is therefore not appropriate to include an emission unit that lacks an NOC approval order in Table 1.6.

19. Page ATT 1-23; Discharge Point: Bulk Vitrification Demonstration Facility; condition approval in middle of page "PROPOSED GENERAL APPROVAL CONDITIONS"
Comment: Delete the word "PROPOSED". At this point-in-time the general approval conditions are enforceable and not awaiting future negotiations.

20. Page ATT 1-76, 77: Bulk Vitrification Demonstration Facility, "Condition: EMISSIONS CONTROL MONITORS"; "Periodic Monitoring", "Test Methods", and "Test Frequency", and "Required Records"; Statement "Refer to Section 5.3.8 of Notice of Construction Application (NOCA)".

Comment: Include the specific monitoring, test methods, test frequency and required records rather than a reference to Section 5.3.8 of the Notice of Construction Application.

Discussion:

The AOP is intended to capture all relevant air emission terms, conditions and limitations. It is not acceptable to reference these in a separate document.

In addition, referencing a document not included in the AOP public review package effectively subverts public review.

21. (editorial) Page ATT 1-83; middle of page, approval condition "Registered Holiday Inn Promotion 6520 web-reservation between registration date of 6/7 and 8/15"

Comment: Remove this text. It appears to be an artifact from an unrelated communication.

Comments: Attachment 2

22. Pages 3 through 19; EPA partial delegation letter and Ecology/Health MOU.

Comment: Remove the partial delegation letter and Ecology/Health MOU and place them in Health's Statement of Basis.

Discussion:

According to WAC 173-401-700(8) and 40 CFR 70.7(a)(5), a Statement of Basis "… *sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)*." Both the EPA partial delegation letter and Ecology/Health MOU address "*the legal and factual basis for the draft permit conditions"*. Neither address specific emission unit conditions.

Health may wish to include a scan of the actual letter rather than an internet copy complete with a URL and date footer.

23. Page 29; heading "Hanford Site License General Conditions and Limitations Applicable to Sources of Radioactive Air Emissions"

Comment: Define "Source". A definition of "source" does not appear in 40 CFR 61, Subparts A or H, in WAC 173-401, or in WAC 246-247. It makes a difference whether "source" is an emission unit or the Hanford stationary source (or major stationary source) or something different.

24. Page 29, subheading "DOE Federal Facilities 40CFR61 Subparts A, H, and WAC 246-247 General Conditions and Limitations"
Comment: For clarity, edit the subheading to read "…Generally Applicable Conditions and Limitations". The text "generally applicable conditions" provides a more accurate description.

25. Page 30; Section 1.0 "40CFR61 Subpart A"
Comment: For clarity, edit the heading to read "Generally Applicable Conditions from 40 CFR 61, Subpart A", or something similar.

26. Pages 30 through 44
Comment: Replace text on these pages with an accurate copy of the federally enforceable general conditions from 40 CFR 61, Subparts A and H.

Discussion:
It appears Health intended to copy certain conditions from 40 CFR 61, Subparts A & H onto these pages. They then modified and re-numbered section headings and paragraphs, and deleted some internal section and paragraph text. This resulted in total nonsense.

Example 1: Section 1.8, *Waiver of compliance*, appears on pages 33 and 34. Text in several of the paragraphs reference "…paragraphs (b)(3) and (b)(4) of this section…". There are no such paragraphs [(b)(3) or (b)(4)] in Section 1.8.

Example 2: Section *2.4, Emissions monitoring and testing procedures*, appears on pages 37 through 42. Text in several of the paragraphs reference "…paragraph b of this section…" or "…paragraphs b and c of this section…". There are no such paragraphs (b or, b and c) in Section 2.4.

There are very likely numerous other examples.

As an alternative, Health could list the specific applicable citations [e.g., 40 CFR 61.01(a), 40 CFR 61.04(b), etc.] in this section and append the entire regulation to the license. The applicable portions of the appended regulation could be highlighted for additional clarity.

27. Page 57; Section 4.0,
Comment: Delete this section and all occurrences of the "State Only" requirement concerning 40 CFR 61, Appendix B, Method 114 for "minor/point sources". This is a new requirement created outside of the regulatory process. As such it is inconsistent with WAC 173-401-100(2), 40 CFR 70.1(b), and the concept a permit/license cannot create or modify regulation.

As required by WAC 173-401-600(2) and 40 CFR 70.6(a)(1)(i), a regulatory citation needs to be provided for this condition.

Discussion:
There is no such requirement in WAC 246-247 or any other state regulation enforced by Health. Also, 40 CFR 61 does not reference use of this method for any emission units other than major point sources.

28. Pages 58 through 61; Section 5.0
Comment: Provide a regulatory citation for each of the requirements in Section 5.0.

Discussion:
WAC 173-401-600(2) states "(2) *Legal authority. The permit shall specify and reference the origin of and authority for each term or condition, and identify any difference in form as compared to the applicable requirement upon which the term or condition is based*." See also 40 CFR 70.6(a)(1)(i).

29. Page 62; Attachment 1 Emission Unit Specific License
Comment: Provide an emission unit-specific table of contents. Such a table would greatly improve the ease-of-use of this attachment.

Discussion:
As a trade-off for not pressing format concerns with AOP Revision H, and on many occasions thereafter, Health committed to provide an emission unit-specific table of contents for Health's license at AOP renewal. That commitment has not yet been honored.

30. Pages 62 through 711; General comment for applicable to all NOC approval in "Attachment 1 Emission Unit Specific License"
Comment: Provide a regulatory citation for each term or condition as required by WAC 173-401-600(2) and 40 CFR 70.6(a)(1)(i). Many individual conditions lack such a citation.

31. Pages 428, 456, 489, 596, 607 and 707; Emission units 300 Area Diffuse/Fugitive, Purgewater Modutanks, 200 Area Diffuse/Fugitive, 600 Area Diffuse/Fugitive, 100 Area Diffuse/Fugitive, and 400 Area Diffuse/Fugitive
Comment: Remove the federally enforceable requirement to monitor these "FUGITIVE, non-point source emission unit(s)" in accordance with (40 CFR 61) Appendix B, Method 114 or (40 CFR 61) Appendix B, Method 114(3). This is a mis-application of a test method contained in an appendix to 40 CFR 61 and referenced by 40 CFR 61, Subpart H. The mis-application represents a new requirement created outside of the regulatory process. As such it is inconsistent with WAC 173-401-100(2), 40 CFR 70.1(b), and the concept a permit/license cannot create or modify regulation.

Discussion:
Fugitive emissions are defined in WAC 246-247-030(12) as "…*radioactive air emissions which do not and could not reasonably pass through a* ***stack, vent, or other functionally equivalent structure*** (emphasis added), *and which are not feasible to directly measure and quantify*". A non-point source is defined by WAC 246-247-030(18) as "…*a location at which radioactive air emissions originate from an area, such as contaminated ground above a near-surface waste disposal unit, whose extent may or may not be well-defined*."

Method 114 is not appropriate for fugitive emission units or non-point sources of emissions. Section 1, "*Purpose and Background*" of Method 114 states in part "[T]*this method provides the requirements for: (1)* ***Stack monitoring*** (emphasis added) *and sample collection methods*

appropriate for radionuclides; (2) radiochemical methods which are used in determining the amounts of radionuclides collected by the ***stack sampling*** *(emphasis added)…*". Fugitive emissions are nowhere addressed in this method.

Additionally, EPA[1] (see paragraph 5a) determined "…[40 CFR 61] *Subpart H provides procedures for evaluating only emissions from point sources…*"

32. Pages 62 through 711;
General comment: Conspicuous by their absence are NOC approvals for the largest construction project in North America, the Waste Treatment Plant. Include them in this AOP or remove all NOC approvals.

Discussion:
WAC 246-247-010(5) states in part "*In accordance with RCW 70.94.161(10), air operating permits issued under chapter 173-401 WAC shall incorporate all applicable requirements of this chapter* [WAC 246-247]…." Based on the appearance of several hundred pages of NOC approvals in the license portion of this AOP, it appears Health believes their NOC approvals are "applicable requirements". Pursuant to Health's regulation, once a NOC approval is issued and accepted, Health has no option but to include it in the AOP.

This commenter readily understands the challenges of accurately capturing changing process descriptions for a massive project where construction and design are concurrent. However, rather than avoiding compliance with regulation, Health should re-assess their total reliance on an inflexible electronic system of generating NOC approvals and their use of a process description as a NOC approval condition. After all, given the same project, the PSD permitting process was successful.

[1] "Memorandum of Understanding Between the U.S. Environmental Protection Agency and the U.S. Department of Energy Concerning the Clean Air Act Emission Standards for Radionuclides 40 CFR Part 61 Including Subparts H, I, Q & T", signed by EPA Assistant Secretary Mary D. Nichols on September 29, 1994 and by Department of Energy Assistant Secretary Tara O'Toole on April 5, 1995

Oliver,

Below is another AOP comment. This comment is being submitted on Aygust 11, 2006, the final day of the public comment period.

Bill Green

****

General: HANFORD SITE AIR OPERATING PERMIT, 2006 RENEWAL (Standard Terms and Conditions)

Comment: Include a compliance plan and schedule pursuant to WAC 173-401-630(3) for those requirements for which the permittee is not in compliance.

Discussion:
It is believed the permittee has satisfied requirements of the Federal Facility Compliance Agreement (FFCA) between EPA Region 10 and DOE signed on February 7, 1994. However, if the 1994 FFCA has not been formally closed, that agreement still needs to appear as an applicable requirement in the AOP.

If the 1994 FFCA has been formally closed, a note to that effect should appear in the SOB and the 1994 FFCA should appear as an inapplicable requirement in Section 5.2 of AOP (Table 5-1, "Inapplicable Requirements.").

The permittee is likely not in full compliance with the revised 40 CFR 61, Subpart H requirements for sampling and monitoring. 40 CFR 61, Subpart H was revised to contain sampling and monitoring requirements described in
ANSI/HPS N13.1-1999. If this is the case, the AOP must contain a compliance plan and schedule for these requirements. [See WAC 173-401-630(3) and WAC 173-401-510(2)(h)(iii)(C).]

Should the permittee be in compliance with the ANSI/HPS N13.1-1999 sampling and monitoring requirements, both the appropriate SOB and Table 5-1 should so reflect.

Williams, Tanya

From: Dale Dyekman [ddyekman@charter.net]
Sent: Thursday, August 10, 2006 11:20 PM
To: Wang, Oliver S. (ECY)
Cc: Hendrickson, Douglas
Subject: Public Comment - 2006 Hanford Site Title V Air Operating Permit Renewal
Attachments: Dyekman Public AOP Comments.doc

Oliver,

Attached in WORD format, please find the subject comments.

Thanks.

Dale Dyekman

P.O. Box 1127
Richland, WA 99352
August 10, 2006

Oliver Wang
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

RE: 2006 Hanford Site Title V Air Operating Permit Renewal - Public Comment

Dear Mr. Wang,

Attached, please find my comments regarding the DRAFT 2006 Hanford Site Title V Air Operating Permit Renewal.

Thank you for your consideration of my comments.

Sincerely,

Dale Dyekman
Washington State Citizen

Attachment

AOP COMMENT RECORD FORM

Document Title: 2006 Air Operating Permit Renewal - "Draft Permit" Review

Reviewer: D. L. Dyekman

Comment No.	Attachment& Section	Comment/Basis	Recommendation	Ecology Disposition
1	Attachment 2; section 5.1.5.1	"***5.1.5.1 Near Facility Monitoring and Reporting*** *Comparison against 10% of the values listed in Table 2 of 40 CFR 61 Appendix E must be performed. Any analytical result that exceeds these values will be reported to the department. Notification may take the form of an e-mail. These comparisons shall be used to demonstrate that activities being conducted under various approvals are being maintained as ALARACT or BARCT.*" COMMENT: Table 2 of 40 CFR 61 Appendix E is an inapplicable requirement that does not apply to the Department of Energy (DOE). Title 40 CFR 61 Appendix E Table 2 is used by NRC licensees, and non DOE federal facilities in determining compliance with 40 CFR 61 subpart I *National Emission Standards for Radionuclide Emissions From Federal Facilities Other Than Nuclear Regulatory Commission Licensees and Not Covered by Subpart H*. DOE Hanford is covered by subpart H, is not an NRC licensee nor a non DOE federal facility, and thus the requirement is not applicable. Existing notification requirements are already defined in WAC 246-247-080(5) and repeated in the Draft AOP Attachment 2 section 3.8. The	Delete paragraph 5.1.5.1 in its entirety from the Hanford Site Air Operating Permit. The existing AOP Attachment 2 section 3.8 contains the applicable standard for required notifications.	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
		additional notification requirements of Attachment 2 section 5.1.5.1 represent a regulatory expansion without the benefit of formal rule promulgation. Additionally, the Appendix E values as used in section 5.1.5.1 represent a technical misapplication of the original intended purpose. Appendix E concentration values have been established by definition to demonstrate full compliance with the applicable public dose standard at the location of the Maximally Exposed Individual. Stipulating a required notification at 10% of the full compliance value is arbitrary, inconsistent with the original purpose, and places unnecessary administrative regulatory burden on the permittee with minimal value added. Also, paragraph 5.1.5.1 stipulates that a notification must occur when the concentration exceeds the stated threshold at the location of environmental air samplers on the Hanford site. The Appendix E values are intended to be used at the location of the Maximally Exposed Individual located off the Hanford site, not at the sampling station location.		

Williams, Tanya

From: Jarvis, Mary F [Mary_F_Jarvis@RL.gov]
Sent: Thursday, August 10, 2006 4:46 PM
To: Wang, Oliver S. (ECY)
Cc: Schmidt, John W (DOH); Martell, P John (DOH); Clark, Sarah (DOH); Hendrickson, Douglas; Bowser, Dennis W; Aldridge, Theresa L (PNSO); Woolard, Joan G; Bates, John A; Peterson, Kirk A; Dyekman, Dale L; Conklin, Al (DOH)
Subject: RE: COMMENTS ON HANFORD AOP 2006 RENEWAL OF #00-05-006
Attachments: AOP-Operational Status Comment Aug 10'06.doc

Oliver,

In additional to the comment package, Kirk Peterson transmitted earlier today to you in DOE's behalf, I'm sending an additional comment (attached) on the Hanford Air Operating Permit Renewal. Thank you for the opportunity to comment and thanks especially for leading this effort!

Regards!

Mary-Maria Jarvis, DOE-RL
Environmental Services Division (ESD)
(509) 376-2256
Hanford Area Pager 85-6328
FAX (509) 372-2610
Mary_F_Jarvis@RL.GOV

From: Peterson, Kirk A
Sent: Thursday, August 10, 2006 2:34 PM
To: Wang, Oliver S
Cc: 'john.schmidt@doh.wa.gov'; 'john.martell@doh.wa.gov'; 'sarah.clark@doh.wa.gov'; 'Terry Flores'; Hendrickson, Douglas (ECY); Jarvis, Mary F; Bowser, Dennis W; Aldridge, Theresa L (PNSO); Barnett, Matthew; Woodruff, Rodger K; Woolard, Joan G; Penn, Lucinda L; Kemp, Christopher J; 'Haggard, Robert'; Weiher, Patrick A; Fritz, Lori; Engelmann, Richard H; Bates, John A; Peterson, Kirk A
Subject: COMMENTS ON HANFORD AOP 2006 RENEWAL OF #00-05-006

August 10, 2006

Mr. Oliver Wang
Nuclear Waste Program
State of Washington, Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99352

Mr. Wang:

The attached comment file is provided during the 30-day public comment period for the subject "draft

permit" which ends on August 11, 2006. This electronic submittal will be followed with a hand delivery of a hard copy later today. The comments are provided by the U.S. Department of Energy, Richland Operations Office (RL) and encompass comments from the U.S. Department of Energy, Office of River Protection (ORP) and U.S. Department of Energy, Pacific Northwest Site Office (PNSO) for their respective operational permittee responsibilities, listed therein.

RL would like to acknowledge the significant effort by key permit and license writers within the state agencies to streamline the very complex compilation of Clean Air Act requirements for Hanford Site facility operations into an improved renewal package.

Please advise if you have any questions on the comments provided and/or feel that subsequent meeting (s) may be beneficial to our partnership in working toward effective resolutions.

Kirk A. Peterson
Senior Environmental Engineer
FH, Environmental Protection
372-2364 (office) 521-2924 (cell)

AOP COMMENT RECORD FORM				
Document Title: 2006 Air Operating Permit Renewal - "Draft Permit" Review				
Reviewer:			**Company/Organization:**	
Comment No.	**Attachment & Section**	**Comment/Basis**	**Recommendation**	**Ecology Disposition**
	Attachment 2	Regarding the "Operational Status" entry provided for each Specific Emission Unit in the FF-01, please remove all such entries. This information is not required content for NOC applications. The Operational Status entries may also raise questions concerning certification of compliance. Such certification would not be reasonable due to non-modification adjustments in facility operations which could routinely affect the status described. As stated by Ecology in response to the latest Annual AOP Certification Report, "Ecology and the DOH determined the licensee need not certify compliance with conditions conveying a right, are a historical summary or fact, pertaining to actions to be completed in the future, or pertaining to actions required of the agency." If the "Operational Status" is kept, then the above statement should be repeated in the AOP to clearly address these entries as not requiring certification.	Remove all Operational Status entries from the FF-01 portion of the AOP.	

From: Jarvis, Mary F [mailto:Mary_F_Jarvis@RL.gov]
Sent: Thursday, August 03, 2006 11:44 AM
To: Hill, Tim
Cc: Peterson, Kirk A
Subject: RE: AOP Comments

Mr. Tim Hill

In response to your e-mail requesting clarification, I am happy to send this reply.

At the Public Meeting on the Hanford Air Operating Permit Renewal on July 26, 2006, I gave two (2) verbal comments in behalf of the Department of Energy, Richland Operations Office, as follows:

1. Regarding the designation of the Building 209E (296-P-31) stack as a major emission unit in the recently-issued FF-01 License; it should be a minor emission unit.
2. The B-Plant stack, 296-B-2, should be identified as closed. A Report of Closure has been filed on this former emission unit.

Thank you for the opportunity to re-submit these comments!

Mary-Maria Jarvis, DOE-RL
Environmental Services Division (ESD)
(509) 376-2256
Hanford Area Pager 85-6328
FAX (509) 372-2610
Mary_F_Jarvis@RL.GOV

Williams, Tanya

To: Wang, Oliver S. (ECY)

Subject: RE: COMMENTS ON HANFORD AOP 2006 RENEWAL OF #00-05-006

-----Original Message-----
From: Woolard, Joan G [mailto:joan.woolard@wch-rcc.com]
Sent: Thursday, August 10, 2006 5:35 PM
To: Wang, Oliver S. (ECY)
Cc: Jarvis, Mary F; Peterson, Kirk A; Landon, Roger J
Subject: COMMENTS ON HANFORD AOP 2006 RENEWAL OF #00-05-006

August 10, 2006

Mr. Oliver Wang
Nuclear Waste Program
State of Washington, Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99352

Mr. Wang:
The attached comment file is provided during the 30-day public comment period for the subject "draft permit" which ends on August 11, 2006. The attached file provides a comment on behalf of Washington Closure Hanford. This comment is not contained in the comments provided by Kirk Peterson earlier today. This comment was identified after the submittal provided by Kirk Peterson.
Joan Woolard
Washington Closure Hanford, 3070 George Washington Way, Richland Washington 99352
509-372-9649

AOP COMMENT RECORD FORM				
Document Title: 2006 Air Operating Permit Renewal - "Draft Permit" Review				
Reviewer:			**Company/Organization:**	
Comment No.	**Attachment & Section**	**Comment/Basis**	**Recommendation**	**Ecology Disposition**
	Attachment 2, FF-01 License, Emission Unit ID: 443	The Monitoring and Testing Requirements references Appendix B, Method 114. Not all the requirements of Appendix B, Method 114 are applicable.	Change the text to read: "Appendix B, Method 114, 3."	

Williams, Tanya

From: Peterson, Kirk A [Kirk_A_Peterson@RL.gov]
Sent: Monday, August 14, 2006 2:35 PM
To: Wang, Oliver S. (ECY); Schmidt, John W (DOH)
Cc: Bates, John A; Hendrickson, Douglas; Clement, Curt J
Subject: FW: AOP Renewal Comments
Importance: High
Attachments: AOPRenewalCommentForm.doc

Oliver/John

A mistake on Kirk's part to not include these comments (could be considered largely editorial in nature) in the integrated package I provided last Thursday; I received in plenty of time, but failed to include.

Since it post 8/11/2006, they are provided for your consideration. The first block shouldn't require additional work by WDOH since it should match input provided on the draft Guzzler (i.e., Filter Vacuum Truck) approval. The ones on the last pages are for Ecology.

Thanks,

Kirk

From: Clement, Curt J
Sent: Wednesday, August 02, 2006 2:34 PM
To: Peterson, Kirk A
Subject: AOP Renewal Comments

Kirk,

Here they are.

Curt

AOP COMMENT RECORD FORM

Document Title: 2006 Air Operating Permit Renewal - "Draft Permit" Review

Reviewer:			**Company/Organization:**	
Comment No.	**Attachment & Section**	**Comment/Basis**	**Recommendation**	**Ecology Disposition**
	2/Page 1 of 23 for EU_ID 476	The baghouses are separate from the cyclone. The new filtered vacuum truck will have 2 baghouses with 34 bags per baghouse.	Make the changes for that were forwarded as part of the license update, such as the ones discussed below. Remove the additional description regarding the cyclone separator.	
	2/Page 3 of 23 for EU_ID 476	"Guzzler" is a trademark protected name.	Suggest replacing with "Guzzler™ (i.e., Filter Vacuum Truck)"	
	2/Page 3 of 23 for EU_ID 476/second condition	The language from the second condition could be improved and clarified to reflect the new Guzzler™.	Suggest changing to the following: 2) This process is limited to the utilization of the Guzzler™ Vacuum Excavation System (Guzzler™) for potholing to support utility locations, soil removal/general excavations, and radiologically limited activities ~~(i.e., less than 50,000 dpm beta-gamma and less than 140 dpm alpha contamination)~~ involving roof or pit cleaning (note, radiologically limited activities means work locations where soil radiological contamination levels are not expected to exceed 50,000 dpm/probe size beta-gamma and/or 140 dpm/probe size alpha). For purposes of this notice of construction, "soil" will be defined as sand, dirt, gravel, gravel and tar mixtures and rock, or any combination of these items. Note, beta-gamma probe size is ~16.7 cm^2 and alpha probe size is ~50 cm^2. Note, the terms, "Guzzler™," and "Filtered Vacuum Truck (FVT)," may be used interchangeably. In most cases, for excavations, the excavated	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
			soil will be used for backfilling of the excavated areas. The backfilling activities will be completed manually, using shovels, or using backhoes, loaders, or packers. For cleaning activities and some excavations, the soil will either be containerized for disposal or transported to ~~the burial grounds~~ an appropriate disposal facility (e.g., LLBGs, ERDF, etc.) within the FVT ~~Guzzler~~ collection tank for noncontainerized disposal. In some cases, soil may be unloaded from the FVT and packaged at the disposal facility for containerized disposal. Only radiologically contaminated or potentially contaminated soil will be removed or excavated using the regulated FVT ~~Guzzler~~ system. All soil removed from the system will be handled as potentially contaminated, unless otherwise surveyed or analyzed. The regulated FVT ~~Guzzler~~ will not be used for the decontamination of valve pits within the tank farms. The regulated FVT ~~Guzzler~~ is also excluded from areas containing ~~regulated chemical contamination and/or~~ radiological contamination above 50,000 dpm/probe size beta-gamma and/or 140 dpm/probe size alpha. Soil can be slowly dumped from the collection tank by controlling the raising and lowering speed of the tank. Soil from contaminated areas enters the unit through a ~~adjustable length, flexible~~ hose ~~connected to an eight inch porthole with an overhead boom located at the rear of the equipment~~. An air lance attachment may ~~also~~ be ~~connected to the end of the flexible hose~~	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
			used to aid in the loosening of soil. The various cleaning and excavation activities will be completed using the FVT ~~Guzzler~~ along with shovels, picks and/or the air lance attachment to loosen the soil, and backfilling activities will be completed using backhoes, loaders, compactors with plates, and picks and shovels, as appropriate. In some cases, however, an area may be physically inaccessible for the regulated FVT ~~Guzzler~~. In those instances, the cleaning or excavation, as well as any backfilling activities will be completed using backhoes, loaders, compactors with plates, and/or picks and shovels, as appropriate.	
	Att. 2/Page 3 and 4 of 23 for EU_ID 476/ third condition	The release rates could be clarified.	Change the release rates to read as follows. <u>100 Areas</u> Alpha- Am241 1.79E-03 gas* WAC 246-247-030(21)(a)(i) Beta/Gamma- Sr90 4.48E-02 gas* WAC 246-247-030(21)(a)(i) <u>200 Areas</u> Alpha- Am241 1.79E-03 gas* WAC 246-	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
			247-030(21)(a)(i) Beta/Gamma- Sr90 4.48E-02 gas* WAC 246- 247-030(21)(a)(i) <u>300 Area</u> Alpha- U234 1.30E-04 gas* WAC 246- 247-030(21)(a)(i) Beta/Gamma- Sr90 4.48E-02 gas* WAC 246- 247-030(21)(a)(i) <u>400 Area</u> Alpha- Pu239 7.26E-04 gas* WAC 246- 247-030(21)(a)(i) Beta/Gamma- Sr90 1.46E-02 gas* WAC 246- 247-030(21)(a)(i) *gaseous physical state assumed for purposes of conservatism relative to assigned release fraction	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
	Att. 2/Page 4 of 23 for EU_ID 476/7th condition	Filtered Vacuum Truck is more descriptive.	Change references to "Guzzler" to "FVT."	
	Att. 1/Table 1.2	These requirements should be in the standard terms and condition section or a plant-wide section. For each emission unit, it should show how these are applicable in the individual tables – if at all. See other permits.	Move table to a plant-wide section.	
	Att. 1/Table 1.2	The periodic monitoring for fugitive emissions ins not very practical. To operate an emission unit in Attachment 1 there is usually not pre-job planning.	Move table to a plant-wide sections. For individual emission units, list all applicable requirements. If the concern is that this would take to much room, general conditions could be numbered and referred to. See other permits.	
	Att. 1/1.4.4	These should be in tables like table 1.5. These tables should list all applicable requirements. This would clarify things.	Place into tables that list all applicable requirements. These tables should clearly indicate which requirements apply. For example, the table would list the 1000 ppm sulfur standard and not the .05 sulfur standard in the fuel or vice versa.	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
	Att. 1/**E-282ED 001 & E-282WD 001**	The required records for NOx are the following: 1. Monthly fuel burned (this calculation is based on fuel added to supply tank). 2. Hours of operation logged. There is no reason for monthly fuel burned to be calculated. Because of the amount of fuel burned is not enough to be delivered monthly, this is just a calculation. The calculation in Model 2 of the current permit just states the following: "Fuel used divided by hours logged will demonstrate the average fuel consumption rate is below manufacturer's specification." Since the amount of fuel burned is based on how much is added to the tank, and it is not added monthly, this is not as accurate as longer time periods. Also number 2 above is a calculation – not a record in the sense that it would be something that is recorded off the meter.	Suggest changing to following: Required records: 1. Calculation results for fuel consumption rate in periodic monitoring. 2. Maintain records showing all hours of operation.	
	Att. 1/**E-282ED 001 & E-282WD 001**	The required records are too restrictive for the condition of no more than 0.05 weight percent sulfur in the fuel. We ought to be able to purchase fuel from other than a retail outlet and supply vendor documentation. Retail outlets are required to sale fuel no more than 0.05 percent sulfur and this percent will be lower in the future (see 40 CFR 80).	Suggest the following: Required records: • Vendor documentation, • Certification in the annual compliance certification that the fuel was from a retail outlet (i.e., for use in motor vehicles, see 40 CFR 80), or • Fuel analysis once per year.	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
	Att. 1/2.7	Retail outlet are required to sale fuel no more than 0.05 percent sulfur and this percent will be lower in the future (see 40 CFR 80). Model 1 that is referred to is no longer in the permit.	Suggest the following: Required records: • Vendor documentation, • Certification in the annual compliance certification that the fuel was from a retail outlet (i.e., for use in motor vehicles, see 40 CFR 80), or • Fuel analysis once per year. Specify where Model 1 is.	
	Att 1/Table 1.7	This table ought to be in the same format as the other emission units.	Place into table like the other emission units.	
	Att 1/Table 1.7/283-W Water Treatment Plant (Chlorine Tank)	Most of these requirements should be in a sitewide requirements section. For example, it's not the 283-W facility that needs to evaluate for new substances – they already are in that situation – it's the rest of the site that needs to do this. 40 CFR 68 applies to stationary sources. Is Ecology implying that 283-W is it's own stationary source with its own "industrial group"?	Remove the sitewide sections to a plant-wide or sitewide section.	
	Att. 1/2.1/Tier 1	It should be clear that one can just perform a Method 9 test right away rather than doing a visible emission survey right away.	Add a note stating so.	
	Att. 1/2.3	Fugitive emissions and fugitive dust does not really apply to specific emission unit in attachment 1. These requirements should be in a plant-wide section with compliance being demonstrated to by the complaint process.	Remove this section and references to it in the individual emission units in Attachment 1.	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
	General/Table of contents	Organizing the AOP around the regulators does not make sense. Hanford is supposed to have one permit from Ecology. There are standard terms and conditions, facility-wide conditions, and emission unit specific conditions. Formatting the AOP in this framework seems to make more sense and appears to more like other permits issued in Washington state. At a minimum, Attachment 3 should be eliminated and those requirements should be moved to where the other facility-wide requirements are. Attachment 2 could also be eliminated, although it might make sense to separated since it is a separate license. See the WSU-Pullman permit for another example of a permit that contains a license. Because the sections are separated by regulator, the permit appears to be 3 different permits. This has allowed for inconsistencies. For example, attachment 1 has periodic monitoring for emission units, while attachment 2 does not.	Reformat the permit. Eliminate periodic monitoring for Attachment 1 units.	
	AOP Renewal/Section 2	As correctly pointed out in the statement of basis, the definition of "major stationary source" talks about stationary source or groups of stationary sources that are under a <u>single major industrial grouping.</u>	Describe the single industrial grouping for the major source.	
	AOP Renewal/4.3.3/	This should reflect the current semiannual reports.	Change second item to clarify it is only for emission units in Attachment 2 and change paragraph 5 to read, "For an emission unit(s) listed in Attachment 2…	

Comment No.	Attachment & Section	Comment/Basis	Recommendation	Ecology Disposition
	AOP Renewal /4.13	This section is unnecessarily complicated. If a unit is permanently shut down, it is in the interest of the permittee to have it removed from the permit.	Suggest eliminating a) and b) and just stating that semiannual report and/or annual compliance certification notes periods when the emission unit did not operate if relevant to compliance.	
	AOP Renewal/5.1	The language in the permit shield should reflect the language in 173-401-640.	Change to read as in WAC 173-401-640(1).	

the probate
were com-
claim must be
ithin the later
days after the
epresentative
ailed the notice
or as provided
r R C W
(c); or (2) four
the date of the
ication of the
claim is not
ithin this time
laim is forever
ot as otherwise
ICW 11.40.051
30. This bar is
s to claims
both the
probate and
assets.
FIRST PUB-
une 25, 2006
cDonald
onald
presentative
Mailing or Ser-

trong
Klym, Waite,
meson, P.S.
oulevard, Suite

A 99352
bate Proceed-
ise number:
unty Superior

t Okanogan
ng A
WA 99336
6-4-00182-1

N FOR BIDS
rden Parks
ent Project
of Pasco,
is inviting and
oid proposals
Burden Parks
Project. This
sists of the
ent of two
od parks (5
res) including
tems, lighting,
creation facili-
quipment and

nts, including
specifications,
ined beginning
June 21, from
ineer's Office,
5 North Third
sco, Washing-
5-3444) or by
ost Office Box
Washington,
lers must be
l to receive a
ge. A non-
payment of
e required for
documents ob-
se direct all
estions to Mike
esign Services
2).
addressed to
the City Coun-
be received at
the City Clerk,
sco, Washing-
hour of **12:00**
sday, July 12,
time and date
ds will be pub-
d and read
are to be
ly on the forms
d in the
.
st be accom-
Good Faith
form of a Cer-
k, Cashier's
d Bond in the
ot less than 5
of the total or

be accepted
ntractor who is
requalified list
unicipal Code
o. 3455.
walk through
at the Casa
k site, 10:00
esday, June
is site is lo-
of Burden
intersection
rive and Gib-
(Travel north
from Burden,
Laredo, con-
o Gibraltar.)
uncil reserves
eject any and
d to waive
lities or
and after

520

Form Approved by Thomas O. Lampson, City Attorney
A copy of this ordinance will be mailed or given to any person without charge, who requests the same from the City Clerk. Requests may be made to Cynthia Johnson, City Clerk, P.O. Box 190, Richland, WA 99352, (509) 942-7389.
#5903 6/25

Public Comment Period and Hearing: Renewal of the Hanford Site Air Operating Permit
Comment Period
July 10 through August 11, 2006
Hearing
July 26, 2006
7:00 p.m.
Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354
The Washington State Department of Ecology invites you to comment on the Hanford Site draft Title V Air Operating Permit (AOP). The AOP regulates air emissions on the Hanford Site. The current permit will expire this year and is up for renewal. The U.S. Department of Energy (DOE) submitted an application for permit renewal, and Ecology has prepared a draft permit.
The public comment period will run from July 10 through August 11, 2006. The permit holder is the U.S. Department of Energy - Richland Operations Office, PO Box 550, Richland, WA 99352.
Copies of the draft permit are available for review by appointment, 509-372-7920, at the Department of Ecology Richland Office Library, 3100 Port of Benton Blvd., Richland, WA. A focus sheet, the draft permit, and additional viewing locations will be available at www.ecy.wa.gov/programs/nwp/commentperiods.htm during the comment period.
Contact Oliver Wang to make a comment or to receive more information. Please submit all comments in writing.
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7971 fax
owan461@ecy.wa.gov
All comments received during the public comment period will be considered and responded to when Ecology issues the final permit decision on whether to approve modification of the permit.
A public hearing will be held on Wednesday, July 26 at 7:00 p.m. at the Nuclear Waste Program office, 3100 Port of Benton Blvd., Richland, WA 99354. Please contact Tanya Williams at 509-372-7883 or twi461@ecy.wa.gov for more information.
#5896 6/25

PUBLIC NOTICE
BENTON CLEAN AIR AUTHORITY TITLE 5 AIR OPERATING PERMIT RENEWAL
Permit Applicant:
Agrium U. S., Inc
Kennewick Fertilizer Operations
PO Box 5797
Kennewick, WA 99337
Benton Clean Air Authority (BCAA) is seeking comments on a modification of Title 5 Air Operating Permit to be issued to Agrium U. S., Inc for the Kennewick, WA facility. The permit is modified to place the Prevention of Significant Deterioration (PSD) permit (PSD-04-01) into the Title V permit, to add requirements specified in BCAA Order of Approval 2002-0014 to the Title V permit, to add alternate calibration procedures under 40 CFR 60.73, to add the test Method 7E for compliance for NOx, to delete section of the permit that refers to emission units shut down due to the PSD

520

vited to attend the hearing and make comments. Written comments may be delivered to 1411 West Clark Street, Pasco, WA or mailed to Franklin PUD, PO Box 2407, Pasco, WA 99302-2407. Please include author's name, physical address, and telephone number. Written comments must be received by noon on June 27, 2006.
Jean Ryckman
Manager
#5898 6/25

SUPERIOR COURT OF WASHINGTON FOR COUNTY OF BENTON
JUVENILE DIVISION
In Re The Welfare Of:
ABIGAIL L. BROWN,
DOB: 01/10/06
NO. 06-7-00356-5
NOTICE & SUMMONS BY PUBLICATION - TERMINATION OF PARENT-CHILD RELATIONSHIP
CLERK'S ACTION REQUIRED
TRI-CITY HERALD
STATE OF WASHINGTON
TO:
TO WHOM IT MAY CONCREN, UNKNOWN FATHER(S)
I. NOTICE OF HEARING
1.1 A petition for termination of parental rights has been filed with this court against you. This petition could result in permanent loss of your parental rights. You have important legal rights and you must take steps to protect your interests.
1.2 A hearing to consider evidence on the petition will be held:
On: AUGUST 1, 2006 @ 9:00 AM
At: Benton/Franklin Juvenile Justice Center
5606 W. Canal Place, Kennewick, WA 99336
II. SUMMONS/ORDER TO APPEAR
2.1 YOU ARE SUMMONED AND REQUIRED to appear at the hearing on the date, time, and place indicated.
III. NOTICE AND ADVICE OF RIGHTS
3.1 You should be present at this hearing.
3.2 You have the right to a fact-finding hearing before a judge.
3.3 You have the right, at the hearing, to speak on your own behalf, to introduce evidence, to examine witnesses, and to receive a decision based solely on the evidence presented to the judge.
3.4 You have the right to have a lawyer represent you at the hearing. A lawyer can look at the files in your case, talk to the Department of Social and Health Services and other agencies, tell you about the law, help you understand your rights, and help you at hearings. If you cannot afford a lawyer and if you qualify, the court will appoint one to represent you. To request a court-appointed lawyer (you will be asked to complete a form to determine if you qualify for a court-appointed attorney) you must contact the Legal Process Unit at:
LEGAL PROCESS UNIT
Benton/Franklin Juvenile Justice Center
5606 W. Canal Place
Kennewick, WA 99336
Phone: (509) 736-2714
THIS IS A NEW COURT PROCEEDING. EVEN THOUGH YOU MAY ALREADY HAVE A LAWYER APPOINTED BY THE COURT TO REPRESENT YOU IN A DEPENDENCY ACTION, YOU MUST RENEW YOUR REQUEST BY CONTACTING THE ADDRESS ABOVE IF YOU WISH TO HAVE A COURT APPOINTED LAWYER REPRESENT YOU IN THIS TERMINATION OF PARENTAL RIGHTS PROCEEDING.
3.5 You may contact or call

520

For more opportunities and full job description, please visit our website:
http://jobs.alaskaair.com
Alaska Airlines is a nicotine free environment and Equal Opportunity Employer.

Alaska Airlines

ConAgra Foods | SPECIALTY POTATO PRODUCTS
Con Agra Foods Specialty Potato Products
Lamb-Weston, Inc., a $1 Billion + major national and international frozen potato products food processor has immediate openings for short haul truck drivers who possess a HS diploma or GED and are willing to work any shift, including weekends in our Hermiston, OR plant:

Truck Drivers

If you possess a Class A CDL, a good driving record, an updated DOT medical card, enjoy being home every night and minimum of one year's experience we want to hear from you. We offer our drivers a competitive hourly rate and an excellent benefits package that includes medical, dental and a matching 401(k) plan, after completion of the probationary period. Con Agra Foods conducts employment drug testing and background checks.

For consideration, please submit a resume to:
Con Agra Foods
Attn: Human Resources
P.O. Box 705
Hermiston, OR 97838
Email: ***resume@lambweston.com***
www.lamb-weston.com
Con Agra Foods is an Equal Opportunity Employer EEO/AAP

GENERAL LABORERS, LAB TECHNICIANS, MAINTENANCE HELPERS and CERTIFIED FORKLIFT DRIVERS
Grandview, WA

Welch's will be accepting applications for General Laborers, Lab Technicians, and Lift operators for this year's grape harvest. Individuals must be available to work 7 days/week, any shift beginning in September through mid October.
General Laborer position requirements: Previous experience in a production environment preferred but not required.
Lab Technicians requirements: General Math knowledge. Ability to work independently, previous lab experience preferred. Ability to comprehend written instructions and lab procedures.
Lift Truck Operators requirements: At least 1 year experience required, Welch's will test forklift ability.
Maintenance Helper: Previous maintenance experience in food production required. Ability to repairs motors and pumps.

DRUG TESTING REQ;D:

Apply in person Monday through Friday 9:00 a.m. to 11:00 a.m. and 1:00 p.m. to 3:00 p.m. at

Welch's
401 Grandridge Road
Grandview, WA 98930
An Equal Opportunity Employer

Maintenance help wanted Must have knowledge of all aspects of Apartment landscape & maintenance

520

Clearwater #B
Kennewick, WA.

PT Maintenance Person
Needed for Tri-Cities area Apartment Complex. Exp essential. Please send resumes to:
TCH BB# 6267
P.O. Box 2608
Tri-Cities, WA, 99302

Small ($10 million annual sales) public company seeking chief financial officer. Applicants must be local to Tri-Cities. Send quals to **M Jones, 458 Bradley Blvd, Richland, WA 99352.**

MOVER/DRIVER
CDL Training provided.
Good driving record.
21 yrs or older.
Help-U-Move. Please fax resume to 542-9912.

Star Rentals has Warehouse position. Equipment knowledge/experience a plus. Good driving record. Mon-Fri, Good pay, benefits & 401K. Pick up application at **1912 W A Street, Pasco, WA.**

STYLIST
Busy salon need skilled professionel to serve lg clientele. Stylist moving out of area. Great opportunity with a future! Call today. **308-6363.**

Summer Help Wanted
Warehouse Person, grain elevator exp a plus. Must be dependable & mechanically inclined, have dependable transportation, be a self-starter with little supervision, hard worker, very punctual and a team player. Must have valid WA St DL w/good driving record. 6 days/wk. Call **586-1128** or apply at **900 E. Col. Dr. Kenn.**

Wanted Front Desk Clerk. Apply at 1342 Jadwin Ave, Richland.

Warehouse
Order Puller $10-16/hr
FT/PERMANENT!
Mon-Fri 8-5! Call 374-3000 ENTRY LEVEL Pull orders for customers: NWE list service. 1 time fee $175 #142 Medical, Dental, Vacation & More!

Winery Lab Techs & Harvest Workers needed for Columbia Valley Wineries: Mid-Aug. thru Nov. Lab Techs must have lab exp. or science degree. E-mail resumes ASAP: ***Seattle@LabSupport.com,*** view detailed job descrip/req. at ***www.oalabsupport.com.***

Yard Hand, must have backhoe, skidsteer exp.
Earthworks Plus Inc
(509)627-3844

AMERICORPS
Volunteer Recruitment
18-25 YEARS OF AGE
High School Diploma or GED.
COMMUNITY INVOLVEMENT LIAISON

Excellent opportunity to work for an innovative organization to learn, grow and earn an education award of $4,725. As an AmeriCorps Volunteer, learn more about your community; meet the people you help and who benefit from your service and help your community understand the issues of hunger in your area.

1 YEAR, FULL TIME COMMITMENT
VOLUNTEER STIPEND

520

in Kennewick between the hours of 8 a.m. and 5 p.m. Monday through Friday or from our website and submit via email, mail or in person at one of the addresses below.

Tri-City Herald
tricityherald.com
VOICE OF THE MID-COLUMBIA
Mailing address:
PO Box 2608, Tri-Cities, WA 99302
Physical address:
333 W. Canal Drive, Kennewick
E-mail:
kjanicek@tricityherald.com
An Equal Opportunity Employer
All employment offers are made contingent upon satisfactory post-offer drug screen test results.
A DRUG-FREE WORKPLACE

Twin Rivers Community Facility - PT substitute staff to supervise teenage male youth in daily living activities, transportation and recreation. Requires High School Diploma or GED and one year experience working with youth in social service, youth group activities, security, corrections, or law enforcement. Two years college will substitute for one year work experience. Some work in all shifts, including graveyard shifts. Starting wage is $13.34/hr. Call **734-7120** or stop by **605 McMurray in Richland** to pick up an application. State of WA is an EOE.

Now hiring bilingual "Spanish/English" Tax preparers, no exp req'd, training provided, Call 735-5438.

Part-time position

Customer Service Specialist

The Tri-City Herald Customer Service Department has an opening for a Customer Service Specialist.
The best candidate will demonstrate a professional image, a helpful attitude, exceptional phone etiquette and listening skills, tenacious follow through and impeccable attention to detail. Basic to advanced computer and keyboarding skills, the ability to multi-task efficiently, the ability to work in a fast-paced, sometimes high stress environment and the ability to spell correctly are required.
This is a part-time position that requires the availability to work a flexible schedule which includes early morning hours and weekends.
Part time benefits include an on-site employee fitness center, half price newspaper subscription, free classified ads and more.
If your qualifications match this position, please forward your resume and a completed job application to the Attention of the Human Resources Manager at the address below. Applications may be obtained at our office, 333. W Canal Drive, Kennewick or from our website at www.tricityherald.com.
We are proud to be an equal opportunity employer which supports diversity.

520

vegetable and fruit see market.

We currently have excitin career opportunitie available at our facility i Warden, WA:

* Customer Service Spe cialist II
* Strategic Account Spe cialist
* Documentation Specialis
* Operations Night Lin Lead
* Operations Specialist II
* Operations Supervisor
* Supply & Stock Contrc Specialist.

Must have a High Schoc diploma/GED. A Bachelor's degree with 1-2 years re lated exp or equivalen combination may be re quired for select positions All positions require ex cellent verbal & writter communication skills, an computer proficiency. Ag ricultural exp/background a plus.

We maintain a drug-free work environment and are an Equal Opportunity Employer. Please submit re sume with salary requirements to: Seminis HR Dept, 2700 Camino de Sol, Oxnard, CA 93030 Fax: 805-918-2545. Email: Careers@seminis.com

SEMINIS

WASHINGTON BEEF

At AB Foods, LLC, a growing agribusiness, we offer a challenging team atmosphere and the understanding that our employees help to shape the future for our business and our industry. Washington Beef, LLC the production division of AB Foods, is currently seeking to fill the following positions at our production facility in Toppenish, WA.

Human Resource Assistant
This position will report to the Human Resource Manager and will include assisting applicants and employees with any employment related issues, conducting interviews, and assisting with orientation and training. Ideal candidate will have excellent communication skills, have above average interpersonal relationship skills and be able to multi-task in fast paced environment. Minimum requirements for consideration are an Associate's Degree and/or equivalent experience within the HR field. English/Spanish required.

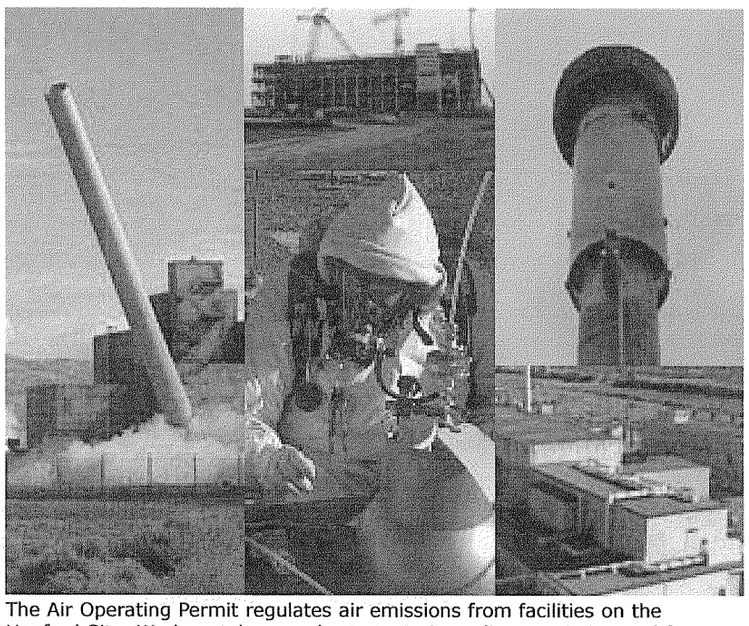
Accountant
This position will report to the controller. Primary responsibilities will be to support and serve as a backup for Controller and Financial Analyst in weekly and monthly preparation of financial reports. Responsibilities include fixed asset reporting and maintenance; developing daily financial position report for management; and preparation of a variety of internal and external accounting reports. Minimum requirements for consideration are a Bachelor's Degree in Accounting or related field and/or equivalent experience; financial spreadsheet skills required; and good analytical skills.

Maintenance Data Entry Clerk
This position will report

Public Comment Period & Hearing

Hanford Site Air Operating Permit Renewal

July 10 through August 11, 2006



The Air Operating Permit regulates air emissions from facilities on the Hanford Site. Workers take samples to test air quality at existing and future facilities.

The Washington State Department of Ecology (Ecology) invites you to comment on the Hanford Site draft Title V Air Operating Permit (AOP). The AOP regulates air emissions on the Hanford Site. The current permit will expire this year and is up for renewal. The U.S. Department of Energy (USDOE) submitted an application for permit renewal, and Ecology has prepared a draft permit.

The public comment period will run from July 10 through August 11, 2006. The permit holder is the U.S. Department of Energy – Richland Operations Office, PO Box 550, Richland, WA 99352.

About the Permit

Congress amended the federal Clean Air Act (CAA) in 1990 by creating AOPs for industrial sources of air pollution (codified in Title V of the CAA). Before then, emissions regulations were scattered throughout the CAA. An AOP brought all applicable requirements into one document.

In 1991, the Washington State Legislature updated the Washington Clean Air Act (RCW 70.94) to make it consistent with these changes. In 1993, Ecology developed Washington's AOP regulation (WAC 173-401) to comply with federal regulations. The U.S. Environmental Protection Agency (EPA) granted the state the authority to implement the AOP regulations in November 1994. The Hanford Title V AOP was first issued in June 2001, for a 5-year period from July 2, 2001 to July 1, 2006.

Three regulatory agencies administer the Hanford AOP. Ecology regulates the nonradioactive criterion and toxic air emissions. The Washington State Department of Health (Health) regulates all radioactive air emissions. The Benton Clean Air Authority (BCAA) administers outdoor burning and asbestos handling.

Renewal Process

WAC 173-401 requires all AOPs be renewed every five years. In 2005, USDOE submitted the renewal application and supporting materials for agency review. The current permit remains in effect during permit renewal.

The regulating agencies reviewed the renewal application, and Ecology prepared a draft permit. The public may review and comment on the draft permit during a 30-day public comment period from July 10 through August 11, 2006.

After the public comment period, Ecology will consider comments and issue a responsiveness summary. The responsiveness summary will detail how comments affect the preparation of the proposed AOP. Then, Ecology will submit the proposed AOP to EPA for a 45-day review. Following this review, Ecology will issue the final permit. If EPA fails to object to a permit that violates the CAA or the implementation plan, any person may pertition EPA to object within 60 days following EPA's 45-day review period.

How can I review the draft permit?

During the comment period, the draft permit is available for public review Monday - Friday, 9 a.m. - 12 p.m. and 1 p.m. - 4 p.m., at the Department of Ecology, Nuclear Waste Program Library, 3100 Port of Benton Blvd., Richland, WA 99354. To make an appointment to review the documents call 509-372-7920. You can also review the draft permit online at www.ecy.wa.gov/programs/nwp/commentperiods.htm or at one of the information repositories listed below.

Portland
Portland State University
Branford Price and Miller Library
934 SW Harrison
Attn: Judy Andrews 503-725-4126

Seattle
University of Washington
Suzzallo Library
Government Publications Division
Attn: Eleanor Chase 206-543-4664

Richland
U.S. Dept. of Energy Reading Room
Consolidated Information Center, Room 101-L
2770 University Dr.
Attn: Janice Parthree 509-372-7443

Spokane
Gonzaga University
Foley Center
E. 502 Boone
Attn: Linda Pierce 509-323-6110

Publication Number 06-05-010

Attend the public hearing! Contact Tanya Williams at 509-372-7883 for details.

Ecology, Health, and BCAA will give presentations and be available to answer questions. Members of the public can submit official verbal and written comments.

July 26 at 7 p.m. at Department of Ecology, 3100 Port of Benton Blvd., Richland, WA

How do I make a comment?

Please send all comments in writing to:

Oliver Wang
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7971 fax
owan461@ecy.wa.gov

If you need this publication in an alternate format, please call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Comment Period & Public Hearing Notice

Comment Period

July 10 through August 11, 2006
Hanford Site Air Operating Permit Renewal

Review the draft permit online at www.ecy.wa.gov/programs/nwp/commentperiods.htm or at an information repository listed on the inside.

Public Hearing

Wednesday, July 26, 2006
Time: 7:00 p.m.
Place: Department of Ecology, 3100 Port of Benton Blvd., Richland, WA 99354
Contact: Tanya Williams, 509-372-7883, tawi461@ecy.wa.gov for more information.

You are invited to participate in the decision to renew the Hanford Site Air Operating Permit. Public comments are critical to Ecology's decision-making process. Look inside to learn more about the renewal process for the Hanford Site Air Operating Permit.

WASHINGTON STATE DEPARTMENT OF ECOLOGY
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

Williams, Tanya

From: Williams, Tanya
Sent: Friday, June 09, 2006 7:32 AM
To: 'hanford-info@listserv.wa.gov'
Subject: Advance Notice: Air Operating Permit Public Comment Period and Hearing

This message is from the Washington State Department of Ecology

Advance Notice
Public Comment Period and Hearing

Hanford Site Air Operating Permit Renewal

July 10 through August 11, 2006

Hearing
July 26, 2006
7 p.m.
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

The Washington State Department of Ecology (Ecology) invites you to comment on the Hanford Site draft Title V Air Operating Permit (AOP). The AOP regulates air emissions on the Hanford Site. The current permit will expire this year and is up for renewal. The U.S. Department of Energy (USDOE) submitted an application for permit renewal, and Ecology has prepared a draft permit.

The public comment period will run from July 10 through August 11, 2006. The permit holder is the U.S. Department of Energy – Richland Operations Office, PO Box 550, Richland, WA 99352.

About the Permit

Congress amended the federal Clean Air Act (CAA) in 1990 by creating AOPs for industrial sources of air pollution (codified in Title V of the CAA). Before then, emissions regulations were scattered throughout the CAA. An AOP brought all applicable requirements into one document.

In 1991, the Washington State Legislature updated the Washington Clean Air Act (RCW 70.94) to make it consistent with these changes. In 1993, Ecology developed Washington's AOP regulation (WAC 173-401) to comply with federal regulations. The U.S. Environmental Protection Agency (EPA) granted the state the authority to implement the AOP regulations in November 1994. The Hanford Title V AOP was first issued in June 2001, for a 5-year period from July 2, 2001 to July 1, 2006.

Three regulatory agencies administer the Hanford AOP. Ecology regulates the nonradioactive criterion and toxic air emissions. The Washington State Department of Health (Health) regulates all radioactive air emissions. The Benton Clean Air Authority (BCAA) administers outdoor burning and asbestos handling.

Renewal Process

WAC 173-401 requires all AOPs be renewed every five years. In 2005, USDOE submitted the renewal application and supporting materials for agency review. The current permit remains in effect during permit renewal.

The regulating agencies reviewed the renewal application, and Ecology prepared a draft permit. The public may review and comment on the draft permit during a 30-day public comment period from July 10 through August 11, 2006.

After the public comment period, Ecology will consider comments and issue a responsiveness summary. The responsiveness summary will detail how comments affect the preparation of the proposed AOP. Then, Ecology will submit the proposed AOP to EPA for a 45-day review. Following this review, Ecology will issue the final permit. At that time, the public has 60 days to contest the permit.

During the comment period, review the draft permit and related materials online at www.ecy.wa.gov/programs/nwp/commentperiods.htm or at one of the information repositories.

For more information, please contact Tanya Williams, tawi461@ecy.wa.gov, 509-372-7883.