Public Review Comments-Draft Hanford Site Air Operating Permit
Submitted by DOE and Hanford Contractors (February 12, 2001)
Responded by Ecology and Health (March 28, 2001)

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
1	ST&C (Standard Terms and Conditions)	1	2.0	The discussion in the draft permit about noncontiguous/nonadjacent facilities that was in the supplemental application is missing. Was this intentional? Ecology has not requested information on the 700 area or the RCHC area. Please add a discussion on the old 1100 area. Also please clarify what Ecology considers the stationary source at Hanford.	1	1. This comment is for ST&C, on Page 7. 2. The discussion about nonadjacent facilities (i.e., 700 Area and RCHC) will be added on Page 7, ST&C. Ecology has already added 1100 Area to Section 11 (Exclusion of activities and facilities) of the Ecology Statement of Basis under "all Port of Benton facilities." 3. Ecology defines "stationary source" in WAC 173-401-200 (32), including any building, structure, facility, or installation that emits or may emit any air contaminant. Certain installations at Hanford can be moved from facility to facility to support needed operation.
2	ST&C	1		Cover page: The Permittee should also include the Office of River Protection, P.O. Box 450, Richland, WA 99352, because it is separate entity from DOE Hanford Operations yet has emission points included in this draft air operating permit.	1	Additional information will be added in Page 1: "The DOE Hanford Site is managed by two offices. The Office of River Protection (ORP) oversees the Hanford Site's tank waste remediation system at 200 Area. The Richland Operations Office (RL) is responsible for environmental cleanup activities and the site-wide infrastructure concerns."
3	ST&C	1		1st paragraph, 7th line, has word(s) missing between "contained," and "all."	1	Should read "…contained in all…" Corrected.
4	ST&C	7	2.0	1st paragraph, 1st sentence: Per newest GIS interpolation of the legal site boundary, the Hanford Site is 586 square miles (Final Hanford Comprehensive Land-Use Plan Environmental Impact Statement, September 1999 [DOE/EIS-0222-F]).	1	This is also stated in the Supplemental Application. Since this is an approximate historical figure and has nothing to do with AOP enforcement, "approximately 560 square miles" is used in the proposed AOP.
5	ST&C	13	4.0	The provision indicates that the permit is not transferable by DOE. The Department of Energy, however, is a non-entity under the terms of the Clean Air Act. The U.S. Government is a "person" under the terms of the Clean Air Act and is subject to enforcement. DOE is only a component of the U.S. Government. If Congress or the President decides to reorganize the DOE, or to reassign its environmental duties to other components within the Executive Branch, the succeeding agency would be required to apply for a new permit, even though the same legal entity is still in control. Suggest the first sentence read as follows: "This permit is non-transferable to owners or operators outside the U.S. Government."	2	No change is required. A change of ownership will be treated as an administrative permit amendment, which is relatively easy and routine. The permitting authority should be notified about any changes in ownership, even within the internal transfer of the U.S. Government.
6	ST&C	14	4.3.1	Correct typo in last sentence of section. "In accordance with … in another annual report, the ~~ensee~~ licensee may provide a copy…"	1	Corrected.
7	ST&C	16	4.3.4	First sentence, suggest adding the word "initial" before the words "...annual compliance certification."	1	Ecology Agrees. The sentence will be changed.

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8	ST&C	17	4.4	The permittee is required to notify inspectors of any restrictions, training or other requirements tied to entry prior to arrival for an inspection. The permit does not state whether the regulatory agency will provide advance notice to the permittee sufficient to prepare special training sessions or security clearance requirements. Otherwise, the only way to comply is to notify each regulatory agency of every requirement applicable to every facility that might be inspected. I note that this requirement is derived from WAC 246-247-080(9).	2	It is permittee's responsibility to inform regulators about needed security clearance and training, and any subsequent changes in entry requirements. Regulators are responsible for taking appropriate training and qualifications before entry. Since most inspections are unannounced by Health, it is important for the licensee to notify the department of any training requirements for all emission units when those requirements are known. The only exception is for entry into the Plutonium Finishing Plant, where security requirements require prior notice. Since this requirement has not been a hindrance in the past four years, we see no need to change it.
9	ST&C	18	4.5	First sentence (item #4) "an exceedance of emission lmits or conditions…." Delete the last portion of the sentence "…that are not met." as redundant and confusing.	1	Ecology agrees. The requested change has been made.
10	ST&C	23	5.1	Applicable Requirements: Correct typo in first sentence. "Compliance with the permit … shall be deemed ~~compliance~~ compliant with the applicable …"	1	Ecology agrees. The requested change has been made.
11	ST&C	12	4.1	Modify end of 1st sentence to read, "…term of 5 years from date of issuance." This avoids the discussion, in the future, of when a renewal application is due. Especially under the circumstance when it takes 3-4 years to issue a renewed permit.	1	Ecology agrees. The requested change has been made.
12	ST&C	12	4.1	Add to end, "…by the agencies, by letter, fascilme, or electronic means:". This avoids potential confusion caused due to common knowledge of an agency relocating its office but not the address to which reports should be delivered.	1	The original sentence is very clear as is.
13	ST&C	15	4.3.2	Please explicate which emissions this requirement applies to and what information is required. This will allow Hanford to better comply with this section.	2	The lengthy requirements are clearly stated in WAC 173-400-105 (1). "The owner or operator of any air contaminant source shall submit an inventory of emissions from the source each year. The inventory may include stack and fugitive emissions of particulate matter. PM10, sulfur dioxide, carbon monoxide, total reduced sulfur compounds (TRS), fluorides, lead, VOCs, and other contaminants, and shall be submitted (when required no later than one hundred five days after the end of the calendar year. The owner or operator shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards." The above statement requires reporting all emissions in the AOP. Individual facilities shall report annual emissions to DOE or designees. WAC 173-400-105 is referenced for this subsection.
14	ST&C	15	4.3.3	Semiannual Reports, Item 4. Item 4 should be revised to reflect the proper table in Attachment 2. Table 2 does not exist in Attachment 2.	1	Comment noted. Change to read 1.2, 1.3 and 2.1

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15	ST&C	17	4.5	Last full paragraph "Notification must be…of the following:", and the four numbered items (#4 is on page 18): Replace this paragraph and the 4 numbered items with the exact text from WAC 246-247-080(5). When this item was originally negotiated, it was with the understanding that the 4 requirements would apply instead of WAC 246-247-080(5). However, these requirements now appear as additional to WAC 246-247-080(5). The Title V process can not be used to expand the regulations.	2	We see no need to change this. This text was previously negotiated and included in the February 1998 draft proposed to EPA. The numbered items appropriately identify what abnormal facility operations if allowed to persist would result in emissions in excess of applicable standards including the BARCT / ALARACT standards.
16	ST&C	18	4.5	2nd paragraph "This license shall…under this license.": Edit this sentence to be consistent with WAC 246-247-080(6). As presently written the licensee is being denied flexibility allowed by the cited regulation. Add the parenthetical clause "(except temporary emission units)" so the sentence reads "...permanently ceased at any emission unit (except temporary emission units) regulated under this license."	2	Comment noted. Replace paragraph with all of 080(6)
17	ST&C	18	4.5	Last paragraph: The provision concerning excess emission and noncompliance with technology based standards would be clearer if the citation were provided in the text as follows: "The permittee may … or upset conditions, in accordance with WAC 173-400-107. The permittee may … due to an emergency, in accordance with WAC 173-401-645.	2	Ecology agrees. The requested change has been made.
18	ST&C	18	4.5	The second item #4 on the page ("the permittee submitted notice of the emergency to Ecology…") - requires either a 2 day, 12 hour, or 24 hour emergency notification to the respective agencies. This is inconsistant at best and confusing at worst. Emergency notification timelines should be all the same value (such as 24 hours) irrespective of radiological or non-radiological consirations. An emergency or threat to human health is still a hazard regardless of the nature of the hazard or the responsible oversight agency.	2	To make the situation less confusing, the modified requirement below is proposed: "4. the permittee submitted notice of the emergency to Ecology (non-radiological emissions) and Health (radiological emissions) within 24 hours of the time when exceeding emission limitations due to the emergency were discovered; and within 12 hours when there is a threat to human health. This notice… " See attached pages for the modification.
19	ST&C	19	4.6	Modify the last sentence to read "All permit conditions [insert the words 'other than those parts of the permit for which cause to reopen exists'] remain in effect until such time as Ecology takes final action". As written, secton 4.6 item #2 combined with this requirement would force permittees to comply with requirements identified as material mistakes or inaccurate statements.	2	Most of the "reopen permit conditions" should still be in effect before any final actions are taken. Ecology propose to modify the sentences as follows: "All permit conditions remain in effect until such time as Ecology takes final action. Respective regulatory agencies may take temporary corrective measures in cases of material mistakes or potential negative impact to public health."
20	ST&C	2		Ecology and BCAA paragraph and attachement 3 are written with an assumption that open burning and asbestos removal would occur only in Benton County (the DOE controlled Wahluke slope, for example, is not in Benton County). Portions of the Hanford site may require either or both activities. Nor are these areas mentioned in 2.0, 3rd paragraph, as excluded facilities. Either exclude or add controls to Ecology portion of AOP for these areas.	2	Ecology has regulatory responsibilities over the entire Hanford Site. Appropriate authorities will be used for potential future activities in areas like Wahluke Slope.

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21	ST&C	2		Either add EPA or remove all other regulators since EPA also regulates emission at the Hanford site (e.g., the Asbestos NESHAP and 40 CFR 82). Other permits seem to have just one regulatory authority.	2	The Federal Facility Compliance Agreement (FFCA) was signed in 1994 between DOE and EPA and since has been updated quarterly. This EPA signature is not required here because the AOP merely reports the history and status of the FFCA. A new paragraph is added as follows to reflect the relationship between EPA and Ecology. “ Regulatory Agency Relationships EPA and Ecology The Title V Air Operating Permit was added in the 1990 FCAA Amendment upon congressional authorization. Ecology is authorized to issue State AOPs under section 502 of the FCAA. Ecology may also delegate the federally approved state permit program to the regional air authorities. Per the EPA approved State Implementation Plan (Chapter 173-401 of the Washington Administrative Code), Ecology is the leading agency for this AOP except Attachment 4. EPA remains the leading regulatory agency for Attachment 4, “Federal Facility Compliance Agreement,” which was signed by EPA and DOE in 1994 to assure 40CFR61 NESHAP (National Emission Standards for Hazardous Air Pollutants) compliance.”
22	ST&C	20	4.9.1	Request the word "shall" in the following statement be replace with "may": "Ecology shall conduct a continuous surveillance program to monitor the quality of the ambient atmosphere as to concentrations and movements of air contaminants." The statement as written appears to obligate Ecology to conduct an air pollutant field sampling/monitoring and meteorological monitoring program irrespective of whether it is warranted, or the best investment of public compliance oversight funds. Note that "may" is used in Secton 4.9.2 to provide Health the same option.	1	The language is quoted from WAC 173-400-105 (2) requests “Ecology shall conduct a continuous surveillance program to monitor the quality of the ambient atmosphere…” Ecology is in fact working with WSU Environmental Lab in establishing a surveillance program to satisfy this requirements. Since this is an Ecology, not DOE requirement, this subsection is removed from the ST&C.
23	ST&C	21	4.10	Section 4.10 , Subsection 1 "1. Recordkeeping (Health is the permitting authority…recordkeeping sub-element.)": Based on previous comment dispositions, all references to Health being a "Permitting Authority" for this Title V permit were supposed to be removed. It appears that the term "permitting authority" in this sub-section title was overlooked at that time. This instance of "permitting authority" should also be removed.	2	Comment accepted. See response to #24 below.
24	ST&C	21	4.10	Delete all of item #1 "In a time not to exceed 1 year ….shall maintain readlily retrievable storage areas at the Hanford Site….." . DOE believes the necessity for this compliance schedule no longer exists. Experience during WDOH inspections for the last two years does not indicate there is a recordkeeping deficiency on the Hanford Site.	2	Comment accepted. At the time this timeline was developed in the first permit draft in 1995; this was a problem. It is no longer a problem, since the 5-year requirement for retrievable records onsite storage has been followed for more than five years. By default this requirement has been met.

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25	ST&C	21	4.11	Please add to the first sentence something like "except as allowed by regulations." For example, new emission unit and modification that are captured in WAC 173-400-110(4) are exempt. There are other exemptions also.	1	Ecology agrees. The requested change has been made.
26	ST&C	22	4.12	Please indicate which emission units this applies to since it seems to be a specific requirement.	2	See Table 1.7 for emission units applied. Applicability of the requirements depends on storage capacity and possible future modifications.
27	ST&C	22	4.13	The provision is not clearly stated. Suggest the sentence read as follows: "The permittee shall comply with the labeling, procurement, maintenance, service, repair and disposal standards relevant to stratospheric ozone protection under 40 CFR 82, Subparts B, D, F and G [40 CFR 82]."	2	Ecology agrees. The requested change has been made.
28	ST&C	22	4.13	The statement: "The permittee shall comply with the labeling, procurement, maintenance, service, repair, or disposal standards for stratospheric ozone protection pursuant to 40 CFR 82, Subparts B, D, F, and G. Records shall be maintained as required." excludes Subparts A,C,E & H. Subparts A,C,E, and H clearly have at least parts that apply to PNNL, and likely the other contractors, and D clearly applies to DOE. Recommend revising the statement to just say "must comply with applicable requirements of 40CFR82..."	2	Ecology agrees. The requested change has been made.
29	ST&C	22	4.14	Please indicate which emission units this applies to since it seems to be a specific requirement.	2	This applies to 283-W Water Treatment Plant. It is so indicated. Relevant information is added in Table 1.7.
30	ST&C	3	Table of Contents	Table of Contents has duplicate entries for 4.3.3. Delete non bold version.	1	Ecology agrees. The requested change has been made.
31	ST&C			Cover Page: The AOP Permit document number should be consistent throughout the attachments. The Standard Terms Section, Attachment 1, and Attachment 2 document number differs. If the document number is to be 00-05-006, then it should be used throughout.	1	Ecology agrees. The requested change has been made.
32	1	3	1.1	Revise second paragraph to more clearly identify the emission units in question. For example, changing "Other emission units..." to "Some emission units…" implies that not every IEU is subject to Subpart H. Other editorial improvements may make this paragraph clearer.	1	Ecology agrees. The requested change has been made.
33	1	3	1.1	Suggest the following editorial/gramatical revision: "*Compliance with the cited applicable requirements in Table 1.2 (see Section 1.3) is required.* ***H****owever, the periodic monitoring, testing, recordkeeping, or reporting requirements listed in Table 1.2* ***are*** *not required."*	1	Ecology agrees. The requested change has been made.
34	1	6	Table 1.1	Emission unit 200E P-244CR 001 - change the word "Sludge Vault" to "CR Vault". The term "sludge vault" does not refer to the 244-CR Vault facility, but instead indicates the 244-AR Sludge Vault facility.	3	Ecology agrees. The requested change has been made.

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35	1	9	1.3	Editorial: Table 1.2, "WAC 173-400-040(6)" Row, "Periodic Monitoring Column: The last 2 entries in this cell ("Other significant emission units:" and "Annual certification") should be deleted as neither appears to apply to the rest of the cell content.	1	Ecology agrees. The requested change has been made.
36	1	9	1.3	Each emission unit ought to have a complete set of requirements listed for it. Table 1.2 adds confusion because you need to flip back and forth to see what the requirments are for any given emission unit. If the reason for this is to save space, give the conditions numbers (e.g., 20% Opacity could be condition 1) and then list the condition #'s in a table for the emission unit. For example, it is not clear what opacity method applies to a unit without an NOC. This could also show how requirement like fugitive dust applies to an internal combustion engine.	2	(1) This comment refers to Page 8, not 9. (2) The format was changed several times in the past. The current configuration seems to be the best. For an emission unit without an NOC, Ecology Method 9A (or other agreed-upon methods) applies. (3) Facilities must apply reasonable implementation processes. For example, fugitive dust requirement may not be applicable to diesel generator operation.
37	1	11	1.4	Editorial: Table 1.3, second "Boiler Annex" column, Boiler Annexes 326, 329, 331, and 337-B: Make the extra row separator lines invisible so that the boilers listed are more clearly associated with the correct Boiler Annex.	1	Ecology agrees. The requested change has been made.
38	1	17	2.0	This table should be clarified to state the periodic monitoring frequency is "At least once per calendar quarter, *when operated*."	3	(1) The comment refers to Section 1.4, not 2.0. (2) Ecology agrees. The requested change has been made.
39	1	17	2.1	The 600 E-WSCF 001 is an engine that is only operated under emergency conditions. Tier 2 requirements are not included in Table 1.4. The facility should be eligible for a reduced emission survey frequency allowed by Tier 2.	3	Tier 1 is more appropriate than Tier 2 for this case. The monitoring shall be conducted “if operated,” see last comment/resolution. (Should be Section 1.4, not 2.1.)
40	1	17	1.4	There needs to be an allowance for the fact that the engines may not operate in a calendar quarter - or maybe even a greater period of time. It would be a waste to start up the engines just to do periodic monitoring. Many of these are for backup power.	3	Ecology agrees. The monitoring shall be conducted “if operated.”
41	1	18	Table 1.5	Modify Test Method column heading to read, "If a field measurement is needed, use ….". As currently presented table implies to public that Ecology Method 9 or EPA Method 6/6C are basis for maintenance of abatement controls, or SO_2 certification.	1	Add sentence in Test Method column to read: “These methods are only used as compliance tools (frequency: not applicable).”
42	1	18	Table 1.5	20% Opacity requirement The Ecology Method 9A in Test Method column 4 should be noted similar (i.e., frequency - not applicable) to that as was done for opacity requirements in Table 1.6 (NOCs). These emission points (without associated NOCs) are, likewise, required to maintain the abatement control technology as required in Attachment 2 and as noted in Periodic Monitoring column three.	2	Tier 3 says the same as the comment (frequency: not applicable).
43	1	18	Table 1.5	First Discharge Point should be labeled 200E P-244-CR 001 "CR Vault", and instead of "sludge vault". Sludge Vault is a common reference to the 244-AR Sludge Vault facility.	3	Ecology agrees. The requested change has been made.

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44	1	19	Table 1.6	Add the following NOC approvals: 241-AZ-101 Tank Waste Retrieval and 241-AY/241-AZ Tank Farms Ventilation Upgrades, Project W-151 and Project W-030, NOC Revision, 10/25/99 Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping, Rev 2, NOC revision, 9/23/99 Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping, Rev 2, NOC revision, 8/10/00	3	Ecology agrees. Approval Dates have been added for each condition. Application revisions are not being tracked in this table.
45	1	23	Table 1.6	NOC DE98NWP-006 (10/26/98) There are three exhausters associated with this NOC. In the discharge point description, change "(296-P-43)" to read (296-P-43, -44, and -45)	3	Ecology agrees. The requested change has been made.
46	1	23	Table 1.6	NOC DE98NWP-006 The initial Ecology approval did not include Tanks 241-T-104, 241-T-110, 241-A-101, and 241-U-102 which were added later in 1999 and approved by Ecology. Clarify this NOC approval by noting that the above mentioned tanks (including those originally listed in Table 1-1 of the NOC application), are approved for saltwell pumping.	3	Include revision date on Page 23. Also include detailed description in Ecology Statement of Basis, Section 21.
47	1	24	Table 1.6	First regulatory requirement under periodic monitoring - delete the frequency "annually". The original Notice of Construction (NOC) application performed worst case emission calculations which were subsequently approved by Ecology. There is no need to re-perform emission calculations that represent a high emissions estimate and bound existing operations. Calculations should be performed if there is any CHANGE in permitted operations.	3	Ecology agrees. Changed to read “Frequency: Not Applicable (conservative worst case calculations were performed in the original NOC application).”
48	1	25	Table 1.6	Discharge Point 200 W-PORTEX 020, 024, and 025 list the Periodic Monitoring requirement incorrectly. This was corrected in a formal review with Ecology. Please insert agreed to corrected statement. The correction was made on Hanford Facility NOC Application Revision Form (modifying DOR/RL-97-10, Rev. 2) signed off by DOE on 8/3/99 and approved by Jerry Hensley of Ecology on 9/13/99, page 5 of 5 includes the following wording: - Once before exhauster operations begins, - Once during exhauster operation - Once after exhauster operation is completed.	3	Comment noted. The three conditions are already stated under periodic monitoring.
49	1	27	1.4	This unit does not currently have the capability to measure monthly fuel burned. Please consider another method. (Its fuel guage is like that in a car.)	3	Change to read “1. Monthly fuel burned (based on annual fuel consumption record).” This is easier than quarterly measurement, and still meet the requirement.
50	1	29	Table 1.6	For regulatory requirement "VOC max emission limit, 50 ppm…" - Test Method Frequency lists EPA Method 25A. This is not correct. Ecology approved, as part of the original NOC and subsequent correspondence a modified test procedure using portable Industrial Hygiene instrumentation. Add the words "...or approved alternative" after EPA Method 25A.	3	Ecology agrees. The requested change has been made. Add “or approved alternative”.

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51	1	30	Table 1.6	Under periodic monitoring requirement to "Analyze total emission to determine if an ASIL will be exceeded. Frequency Annually". Delete the annual requirement. The original NOC application performed worst case emission calculations which were subsequently approved by Ecology. There is no need to re-perform emission calculations that represent a high emissions estimate and bound existing operations. Calculations should be performed if there is any CHANGE in permitted operations.	3	Ecology agrees. Change to read "Frequency: Not Applicable (conservative worst case calculations were performed in the original NOC application)."
52	1	31	1.4	This unit does not currently have the capability to measure monthly fuel burned. Please consider another method. (Its fuel guage is like that in a car.)	3	Change to read "1. Monthly fuel burned (based on annual fuel consumption record)." This is easier than quarterly measurement, and still meet the requirement.
53	1	33	Table 1.6	Discharge Point Number **300 EP-3020-01-S through -12-S**: "NSR Thresholds - N" and "ASILs -Y" shown in the Test Method/Frequency column should be moved to the State Only Enforceable column, replacing the "N" that is now in the latter column.	3	Ecology agrees. The requested change has been made.
54	1	34	Table 1.6	Discharge Point Number **300 EP-3020-02-S through -06-S**: Revise to reflect approval condition as stated in NOC. NOC 94-08, Approval Condition 3 (dated 09/12/1994) specifies the use of Test Method 9B.	3	Ecology agrees. The requested change has been made.
55	1	34	Table 1.6	Discharge Point **300 EP-3020-07-S through-11-S:** "NSR Thresholds - N" and "ASILs -Y" shown in the Test Method/Frequency column should be moved to the State Only Enforceable column, replacing the "N" that is now in the latter column.	3	See response to #56.
56	1	34	Table 1.6	Discharge Point Number **300 EP-3020-07-S through -11-S**: Delete approval condition - repeat of approval condition as stated on page 1-33.	3	Ecology agrees. The requested change has been made.
57	1	35	Table 1.6	Discharge Point Number **300 EP-3020-07-S through -11-S:** Edit as indicated: Required Citation: NOC 94-08 Date ~~9/12/94~~ ***(as modified 06/13/2000)*** The stated approval condition originates from 06/13/2000 modification to NOC 94-08.	3	Ecology agrees and will add the phrase "and subsequent revisions".
58	1	35	Table 1.6	Discharge Point **300 EP-3030-07-S through-11-S**: The row of text at the bottom of the page that starts out in the left column with *"The Environmental Molecular Sciences Laboratory (EMSL) research projects, supporting operations, ..."* should be deleted. It duplicates requirements in the last row on page 1-33. All the requirements contained in this row are already contained in the last row on page 1-33.	3	(1) This comment is for page 34. (2) Deleted.

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59	1	36	Table 1.6	Discharge Point Number **300 EP-3020-07-S through -11-S:** Edit as indicated: Required Citation: NOC 94-08 Date ~~9/12/94~~ *(as modified 06/13/2000)* The stated approval condition originates from 06/13/2000 modification to NOC 94-08.	3	Ecology agrees and will add the phrase "and subsequent revisions".
60	1	36	Table 1.6	Discharge Point **300 EP-3030-07-S through-11-S**: The header for this item should read: "Discharge Point Number: **300 EP-3020-07-S through –12-S**, Environmental Molecular Sciences Lab (EMSL) 300 EP-3020-07-S through –12-S Natural gas fired boilers and diesel generator" since the requirement includes text that applies to those emission points (7-S through 12-S).	3	Ecology agrees. The requested change has been made.
61	1	37	Table 1.6	Bottom row "Total Building Emission Limits": 1) Delete the "N" in the "State Only Enforceable" column. 2) Move "ASILs - Y, NSR Thresholds - N" to the "State Only Enforceable" column.	1	Ecology agrees. The requested change has been made.
62	1	37	Table 1.6	Middle row "GCMP Release Limits": Delete this row as the requirement is captured in the next (bottom) row.	1	Do not delete. The condition is quoted directly from the NOC. Replace "N" with "Y" under "State Only Enforceable."
63	1	38	Table 1.6	Bottom row "Total Building Emission Limits": Delete this row as the requirement is captured in the text, bottom row, page 1-37.	1	The conditions may be a little redundant. They are directly quoted from the NOC. Add "& 7A" to the "Calculation Model ID."
64	1	38	Table 1.6	Top row "Total Building Emission Limits": 1) Append the "Regulatory Requirement…" column entry ("A new NOC will be …PNNL for inspection") on page 1-38 to the "Regulatory Requirement…" column entry on page 1-37. 2) Append the "Required Records" column entry (5 numbered items) on page 1-38 to the "Required Records" column entry ("1. Results of analyses.") on page 1-37. 3) Delete the "Periodic Monitoring", " State Only Enforceable", "Test Method/Frequency" , and "Calculation Model ID" column entries (top row only).	1	Again, the language is directly quoted from the NOC. Add ", 7A & 7B" to the "Calculation Model ID."
65	1	39	Table 1.6	The readability and utility of the permit would be improved if the Required Records in the item at the top of the page were moved into the item at the top of page1-37, and the item at the top of page 1-39 could then be deleted.	1	The comment has merit. However, this AOP will keep parallel comparison with the NOC.
66	1	42	Table 1.6	Discharge Point **300 EP-329-01-S**: This discharge point is HEPA filtered. So the opacity periodic monitoring requirement should read "See Section 2.1, Tier 3". The Test Method/Frequency should read "Method: EPA Method 9" Frequency: Not Applicable". This is the EPA method per the NOC approval condition, not an Ecology method.	3	Ecology agrees. The requested change has been made.

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67	1	44	Table 1.6	Record keeping requirements are stipulated in the draft AOP text for the 340-A Building Tank Solids Removal but are not an identified requirement contained in the Ecology approval order 97NM-137, or Notice of Construction application DOE/RL-97-06. The reviewer does not understand the basis for the record keeping requirements contained in the draft AOP.	3	Title V requests reasonable "gap-filling" in monitoring and frequencies that may be lacking in the NOC process. The regulatory basis for this specific requirement is WAC 173-401-615 Monitoring and related recordkeeping and reporting requirements.
68	1	45	1.4	This table looks like a draft. "for information only" and "applicable requirements for miscellaneous emission units will be added here." There are no methods or recordkeeping requirements given.	1	The draft information is deleted. The recordkeeping requirements, if needed, are quoted or referenced in the Table.
69	1	46	2.3	Need to specify here, or in basis section, whose working days, permittee or Ecology, as they are not necessarily on the same work schedule.	1	Permittee's working days are used for all AOPs.
70	1	46	2.1	It is not clear from these provisions what would be considered in compliance. This will be important for the annual certification. For example, if the operator observes visible emissions for >10 consecutive minutes, and it takes 2 hours to determine the cause, would this be in compliance or out of compliance? When do corrective actions need to be taken? How would this method be applied to a noncombustion source (e.g, a tank)?	3	(1) Records of corrective actions taken to reduce opacity are important to determine if reasonable time was used in determining cause and correcting problems. As long as the corrective action process is reasonable, no specific time limits are given. (2) If all reasonable corrective actions fail, operator should shut down the facilities for further evaluation (unless emergency condition exists). (3) Noncombustion source should not be a candidate for opacity concern. Use Tier 2 guidelines for compliance. (4) WAC 173-490-040 (6) (d) describes recordkeeping requirements and minimum records of certification tests. The owner or operator of a gasoline transport tank or vapor collection system shall maintain records of all certification tests and repairs for at least two years after the test or repair is completed (WAC 173-490-040 (6) (d)(1).
71	1	49	3.0	Add at end, "Except where original records are specified electronic or hard copy records will satisfy these requirements." Most of these records are retained on-site in electronic format.	1	Ecology accepts electronic records as supporting information as well.
72	1	55	3.1	There is listed a model number 2, and 2B, but no 2A. Model numbers should be sequentially listed to eliminate confusion.	1	Through many reviews and revisions, model numbers are no longer sequential. Since we use model numbers as identification tool, it is not necessary to change.
73	1	62	3.1	Model numbers 8 and 9 are absent. The model listing jumps from 7 to 10. Model numbers should be sequentially listed to eliminate confusion.	1	See response to #72.
74	1	30	Table 1.6	Bottom row "An annual assessment…of airborne emissions.": Add "Frequency: Annually." to the "Periodic Monitoring" column for this condition.	3	Ecology agrees. The requested change has been made.
75	2	1		Editorial: The parenthetical "(as part of NWP-AOP-00-1)" should be changed to reflect Ecology's permit number 00-05-006.	1	Ecology/Health agrees. The requested change has been made.
76	2	2	TOC	For ease in locating the tables, add table numbers and corresponding page numbers to Table of Contents.	1	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
77	2	3	2.1	First paragraph - the term "EDE" is used repeatedly. The regulatory basis for this section (WAC 246-247) does not use the term "EDE" at all, and it is not defined in the WAC, nor the AOP acronym page. The correct term as used in WAC 246-247 is "TEDE". Substitute TEDE for EDE in this section.	1	The EDE is used in 40 Part 61 to determine the dose standard. The TEDE will be used to determine PTE.
78	2	3	2.1	First paragraph - last sentence. Substitute the word "emissions" for "EDE" so the sentence reads "The calculated emissions are input to the dispersion and other computer models described in 40CFR 61.93 using abated emission to calculate the dose.". Curie emissions are input to the code and doses are output. EDE is not an input parameter to the dispersion models.	1	Health agrees and will make the requested changes.
79	2	3	2.1	1st paragraph, last sentence: Delete "using abated emission to calculate the dose".	2	Abate is the correct term.
80	2	4	2.2	Last sentence "Specific provisions of…of this license.": Table 2 should be changed to table 2.1. There is no Table 2.	1	Health agrees and will make the requested changes.
81	2	4	2.2	ALARACT Demostration Requirements, 5th Sentence: - correct typo. "Demonstrations reflect good industrial practice and will minimize~~ing~~ emissions until the …"	1	Health agrees and will make the requested changes.
82	2	5	3.0	This figure provides a process to request a change in pcm for minor stacks. There needs to be a similar figure describing the process to reclassify a major stack to minor stack without necessitating a permit modification.	1	This change by definition is a permit modification. Reference WAC 173-401-724(1) and WAC 173-401-725(2)(a)(i)(b)
83	2	5	3.1	4th paragraph. The reference to Table 1.1 for minor stacks should be changed to read Table 1.2.	1	Health agrees and will make the requested changes.
84	2	5	3.1	End of top paragraph "All required stacks…,Subpart H.": add the clause "published in the Federal Register on December 15, 1989." after "Subpart H" to make the paragraph consistent with the cited regulation.	2	Health agrees and will make the requested changes.
85	2	5	3.1	Please revise the note to clearly state that the monitoring and testing only when the stack operates applies to all stacks listed in Tables 1.1 and 1.2. Also, clarify that monitoring also refers to periodic confirmatory measurement and/or sampling so there is no confusion. Please consider, Note:Monitoring <u>and sampling or measurement</u> for emisison units listed in Tables 1.1 and 1.2 needs only to occur if the emission unit operates during the year.	2	Comment noted. Text changed to read per comment Note.
86	2	6	3.0	Block 2 should read 0.1 mrem/yr and not 0.01mrem/yr; the asterisk note should read 0.1 mrem/yr and not 0.01mrem/yr. This would make the text on the previous page (referring the reader to Figure 1) and Figure 1 in agreement.	1	These values are correct as written. Fig. 1 only applies to emission units with the PTE less than 0.1 mrem/yr. The value of 0.01mrem/yr in block 2 is a threshold value used to determine allowable alternatives.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
87	2	8	4.1	Section 4.1 specifies that the "licensee must have a documented quality assurance program compatible with the requirements of ANSI/ASME NQA-1, NQA-2, QAMS-004, and QAMS-005." The is beyond the QA program requirements as stated in WAC 246-247-075(6). WAC 246-247-075(6) is not prescriptive to which standard the licensee shall use, it only states that the licensed facilities shall conduct and document a QA program that is compatible with national standards "such as" NQA-1, NQA-2, QAMS-004, and QAMS-005. It is recommended that the requirement be edited as follows: "Under WAC 246-247-075(6), the licensee must have a documented quality assurance program compatible with ~~the requirements of~~ ***applicable national standards, such as*** ANSI/ASME NQA-1-1998, NQA-2-1986, QAMS-004, and QAMS-005."	2	Health agrees and will make the requested changes.
88	2	8	4.1	Indented paragraph "Under WAC 246-247-075(6)…action was accomplished.": Accurately quote the cited regulation. The paraphrasing appears to add additional requirements.	2	This paragraph has been restructured into two paragraphs. The correct WAC authority is cited.
89	2	9	4.2	Sub-Section 2 - Records Required, Notices of Construction, pg 2-9 Revise the 2nd bullet to read "Approval orders from WDOH including approval conditions" and add a 3rd bullet to read "Approval to Construct letters from EPA". The basis of the above initial comment was that the reviewer believed it to be important to differentiate between Health approval orders and EPA approvals to construct. As currently written, it infers that approvals to construct are an equivalent to approval orders with approval conditions. EPA approvals to construct have no approval conditions.	1	Health agrees and will make the requested changes.
90	2	11	4.3	The following sentence is listed twice in this section. The 1st time it appears in the text should be deleted. "Table 2 identifies passively ventilated minor point sources in high level waste tank farms with emission controls."	1	Comment noted. The indented table descriptions identify enforceability requirements for abatement technology and monitoring, so they are not redundant. Sentences above the indented text have been revised for clarity.
91	2	11	5.0	6th paragraph "Table 1.2 identifies…Non-destructive Assessment (NDA).": All the methods contained on the page 2-7 graphic need to be listed. Add engineering calculations and wipe samples.	1	Comment noted. Text revised to indicate other methods allowed.
92	2	11	5.0	7th paragraph "Table 2 identifies…waste tank farm.": Table 2 should be Table 2.1.	1	Health agrees and will make the requested changes.
93	2	11	5.0	8th paragraph "Table 3 identifies…(Ref: WAC 246-247-075(8)).": There is no Table 3. The reference should be to Table 1.3 (see page 2-241).	1	Health agrees and will make the requested changes.
94	2	11	5.0	2nd and 3rd paragraph It is suggested that the reference to Table 2 be changed to Table 2.1 for the passively vented point sources.	1	Health agrees and will make the requested changes.

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95	2	11	5.0	Indented paragraph (1), first sentence "All information from…considered applicable requirements": Per WAC 246-247-060(1) a NOC is to be obtained early in the design phase. Mandating that a NOC required early in the design phase accurately represent all aspects of the completed project is not reasonable. However, it would be reasonable to require that the proposed monitoring, proposed control technology, proposed recordkeeping and projected emissions be considered applicable requirements.	2	Added the word "Approved" before NOC to distinguish and approved NOC from an application.
96	2	11	5.0	The provision pertaining to the Notice of Construction (NOC) indicates that: (1) all information contained within the NOC is considered an applicable requirement; and (2) modification approval is required to change a specific applicable requirement. Consequently, it appears that a modification must be processed for any deviation from the NOC, whether it is physical, procedural, administrative or otherwise, and that a failure to process a modification for even the most insignificant change would constitute a technical violation of the permit. The last sentence, which indicates that a modification approval is not required for process system changes or for any description in the NOC which qualifies under the provisions of WAC 173-401-722 and 724, does not necessarily obviate the need to initiate a modification in every possible instance. We recommend that the portion of the provision which makes all information within the NOC an "applicable requirement" be deleted. That statement is too broad and can lead to technical violations of the permit if an insignificant change occurs but does not fall within the escape provisions of WAC 173-401-722 or 724. The need for a modification should be tied more closely to its definition under WAC 246-247-030(16), where a "modification" is defined as a change that could increase the quantity or composition of the radioactive emission. In such cases, modification approval would be required. Accordingly, we suggest the provision read as follows: (1) All information within the NOC should be representative of the emission unit. Modification approval is required if a physical change to the emission unit, or change in the emission unit's method of operation, could increase the amount of radioactive materials emitted or result in the emission of a radionuclide not previously emitted. Modification approval is not required for a process system change, or description in any NOC that qualifies under the provisions of WAC 173-401-722 or 724.	2	Deleting the applicable requirement would be contrary to the letter and spirit of our regulations. While stating that any "insignificant change would constitute a technical violation" is an overstatement, the point demonstrates the need for the licensee to accurately and completely describe the process in the Notice of Construction (NOC). Future modifications, defined as those that increase the potential-to-emit (PTE), are then subsequently handled by new NOCs, while changes that do not increase the PTE are handled by NOC revisions in a simple format already agreed to by DOE-RL and the department. History demonstrates that the department does not treat "insignificant" changes as anything other than "insignificant", working with DOE-RL and contractors to rectify the issue and a simple and easy process.
97	2	11	5.0	Delete sentences #2 and #3 which state other listed equipment and fans are required abatement control technology. Other listed equipment is not an WAC 173-401-200(4) AOP applicable requirement. Equipment other than pollution control filters do not meet the WAC 246-247 definition of abatement technology and are not required per ASME N509 Nuclear Power Plant Air Cleaning Units or ASME N510 Testing of Nuclear Air Treatment Systems	2	This is text that has been previously negotiated and was included in the earlier proposed draft. No change will be made.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
98	2	12	5.0	Item #4 requires a date for cessation of operations be submitted. Please delete this as it is not an AOP applicable requirement per WAC 173-401-200(4).	2	These specific requirements apply to all the DCRT's. This language was reach by collaborative agreement with DOE-RL as a correction to an audit finding. This agreement allowed the DCRT's to continue operation under these restrictions as the DCRT controls are not in compliance with testability requirements.
99	2	12	5.0	Item # 6, delete as it is not an applicable requirement to be listed in the AOP as defined in WAC 173-401-200(4) and 173-401-600.	2	These specific requirements apply to all the DCRT's. This language was reach by collaborative agreement with DOE-RL as a correction to an audit finding. This agreement allowed the DCRT's to continue operation under these restrictions as the DCRT controls are not in compliance with testability requirements.
100	2	13	5.0	Need to add text explaining what the 3 or 4 different point source identifications mean or their use. Specifically identify which of these is the source identification for the AOP if only one of them applies. The multiple source identifications can lead to comunication problems if it is not clear what source identification is being used.	1	Comment noted. Identification text added to the Statement of Basis to explain emission unit identifications used..
101	2	13	5.0	The order of listing approval conditions is not the same between the AOP list of conditions and the referenced permit approval, so the numerical references in the AOP are not correct. This can lead to confusion if one uses both the AOP and the permit approval documents. Suggest a notation in section 5.0 that all approval conditions references refer to the underlying AIR letter. Specific examples are included in this table.	1	Comment noted. A notation in sect. 5.0 was made.
102	2	15	5.0	Permit No. AIR 97-605 (NOC_ID 229), conditions #2 "Prior to start-up…shall be notified.": This condition is obsolete as the project has already "started" and Health was notified. Remove this condition from the license.	3	Health agrees and will make the requested changes.
103	2	18	5.0	The emission unit 296-P-33 and 296-P-34 (page 2-21) have identical Permit numbers (AIR 98-301), but the individual conditions are in different order (i.e 296-P-33 condition #1 is listed as condition #10 for 296-P-34). The permits are identical and the conditions should be listed in identical order to eliminate confusion.	1	This problem exists as a result of a data program used to generate this document. Due to time constraints imposed on the permitting agency, this issue can not be resolved.
104	2	18	5.0	AIR 98-301 (NOC_ID 261): There is only one active condition contained in this AIR letter, condition #6 on page 2-19. Many of the conditions that appear here are duplicates: condition 14 is the same as condition 16, condition 18 is the same as condition 22, condition 4 is the same as condition 9, condition 8 is the same as condition 21.	3	This was a programming issue in the DOH database. Obsolete conditions are now identified as obsolete conditions.
105	2	18	5.0	Emission unit 296-P-33 has a potential to emit radionuclides less than 0.1 mrem/yr as documented in the Health approved Notice of Construction Application and should be deleted from the major source Table 1.1 and moved to the minor source Table 1.2.	3	The potential-to-emit in the conditions report refers to an approved activity for the emission unit.
106	2	18	5.0	296-P-33, Condition # 22 of AIR 98-301 a duplicate of Condition #18.	3	See response to comment #104.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
107	2	21	5.0	AIR 98-301 (NOC_ID 261): There is only one active condition contained in this AIR letter, condition #6 on page 2-22. Many of the conditions that appear here are duplicates: condition 14 is the same as condition 16, condition 12 is the same as condition 18, condition 4 is the same as condition 9, condition 8 is the same as condition 21.	3	Obsolete issue corrected.
108	2	21	5.0	Emission unit 296-P-34 has a potential to emit radionuclides less than 0.1 mrem/yr as documented in the Health approved Notice of Construction Application and should be deleted from major source Table 1.1 and moved to the minor source Table 1.2.	3	See comment response to #108.
109	2	21	5.0	296-P-34, Condition # 18 of AIR 98-301 a duplicate of Condition #12 and Condition #21 is a duplicate of Condition #8	3	See comment response to #104.
110	2	24	5.0	200E P-296A042-001: The same conditions are listed for each approved active Notice of Construction. However, the inconsistent numbering of the same condition leads to confusion. This is especially true where the text reads: "16. NOTE: There is no Condition 13." The order in which the approval conditions are listed does not match the referenced permit approval.	1	Conditions were numbered incorrectly in AIR letter 98-708. There are no missing conditions.
111	2	24	5.0	The document issued on 8/18/98 was not AIR 98-708, but rather only a clarification of conditions 12, 16 & 17 of AIR 98-708.	3	Comment noted. Excluded from the AOP.
112	2	24	5.0	296-A-42, The NOC approval dated 8/18/98 was not an approval. It was a clarification of AIR 98-708 and did not add any new approval conditions as is noted in Condition #1. In view of this, the 8/18/98 clarification should be deleted since the NOC approval conditions are shown under AIR 98-708.	3	Health agrees and will make the requested changes.
113	2	24	5.0	296-A-42, The NOC Revision approval Conditions dated 1/19/99 is a duplicate of the Conditions for AIR 98-708 as also noted in Condition #3.	3	Comment noted. Duplicate condition deleted.
114	2	24	5.0	296-A-42 approval AIR 98-708 dated 7/10/98 The numbering of the approval conditions seem to be out of sequence. Items #7 and #20 do not make sense.	3	Comment noted. Items #7 and 20 deleted. See response to comment #103.
115	2	25	5.0	There is only one condition in the 1/19/99 (NOC_ID 333) NOC Revision Approval. That condition is that conditions of AIR 98-708 apply.	3	See response to comment #113.
116	2	27	5.0	Conditions #7 ("NOTE: There is no condition #13.") and # 20 ("NOTE: There is no condition #14.") should be deleted as conditions 13 & 14 do appear.	3	See response to comment #114
117	2	29	5.0	296 -C-6, Tank Sluicing, Phase II The NOC Revision form approval listed with Permit No AIR 98-1002 should be shown as a separate approval dated 4/8/99. (NOTE: There have been two NOC approvals associated with this emission point (4/8/99 and 10/2/98). It is requested that the NOC approvals be separated.)	3	Comment noted. The NOC revision and two conditions added.

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118	2	35	5.0	For major stacks 296-A-25, 296-B-28, 296-C-5, 296-T-18, 296-P-16, 296-S-22, include a note indicating that the stack(s) are included in the FFCA and are undergoing upgrades.	1	Attachment two has been revised to include the latest FFCA status.
119	2	38	5.0	The Permit No dated 5/6/99 (NOC_ID 363) contains the same 3 active conditions as NOC_ID 365 (see page 2-32).	3	Duplicate NOCs. Combined under NOC id 365.
120	2	41	5.0	The Permit No dated 5/6/99 (NOC_ID 364) contains the same 3 active conditions as NOC_ID 365 (see page 2-32).	3	See previous comment response.
121	2	44	5.0	Emission Unit ID 402, 4/25/00 Approval: Move condition #2 under the 4/25/00 approval to follow condition #4.	3	This NOC and these conditions are obsolete and will be removed from the permit.
122	2	45	5.0	Emission Unit ID 402, AIR 97-1012: Delete conditions 1,3,4 and 5 as they are obsolete. Condition #2 should be retained.	3	Obsolete issue corrected.
123	2	45	5.0	Pages 45 & 46 291-B-1: Emission Unit ID 402, AIR 97-805: Add the following note to condition #3, "[Note: Only the test requirements of 8.2 and the sampling requirements of Section 9.4.4 are currently applicable. The requirements of the other sections were completed during construction.]"	3	Health agrees and will make the requested changes.
124	2	45	5.0	Agreement of Surveillances Dated 10/6/99: This approval is now obsolete and should be removed from the WDOH License.	3	Obsolete issue corrected.
125	2	46	5.0	AIR 97-805, 8/20/97, NOC_ID 235, condition #3: The condition should read "The new 296-B-1 Stack…" rather than ...291-B-1.	1	Health agrees and will make the requested changes.
126	2	50	5.0	NOC Revision Approval, 9/8/99, NOC_ID 392: Delete this entry. This NOC Revision Approval only modified text in the NOC application. No new approval conditions were imposed and no existing conditions modified.	3	Excluded from the AOP per comment.
127	2	50	5.0	NOC approvals for Waste Encapsulation and Storage Facility (WESF) Liquid Low Level Radioactive Stream Piping Modification and Contingency Operations approved on 2/26/98 should be added.	3	Health agrees and will make the requested changes.
128	2	50	5.0	It appears as if the approval conditions listed for each project are not the correct conditions for that project. Many of the conditions listed correspond to an obsolete NOC.	3	Obsolete issue corrected.
129	2	51	5.0	AIR 99-501, 5/19/99, NOC_ID 369: This AIR letter contained no conditions. Conditions 2, 3, and 4 should be deleted.	3	Obsolete issue corrected.
130	2	51	5.0	NOC Revision Approval, 1/19/99, NOC_ID 334: All conditions became obsolete on 4/17/00 when the project was completed.	3	Health agrees and will make the requested changes.
131	2	51	5.0	RTAM, 12/17/97, NOC_ID 249: This RTAM should be removed as the project was completed 4/17/00.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
132	2	52	5.0	296-P-16, 296-S-22 This emission point lists the "Stack Monitoring System Upgrades Resume Work Strategy" as a NOC approval having three conditions as a means of demonstrating compliance with the NOC. It is the reviewer's opinion that the resume work strategy is not a NOC approval condition but rather is a clarification as to how the licensee is to demonstrate compliance to the NOC conditions. It is suggested that the resume work strategy be deleted from Table 1.1. Perhaps it is more appropriate to include the resume work strategy in the Statement of Basis.	3	Conditionally demonstrating compliance to an approved NOC were added by this RTAM as applicable requirements to the approval.
133	2	55	5.0	The Permit No dated 5/6/99 (NOC_ID 367) contains the same 3 active conditions as NOC_ID 365 (see page 2-32).	3	Duplicate NOCs. Combined under NOC Id 365.
134	2	55	5.0	296-B-28, 296-C-5, 296-T-18 This emission point lists the "Stack Monitoring System Upgrades Resume Work Strategy" as a NOC approval having no approval conditions. It is the reviewer's opinion that the resume work strategy is not a NOC approval condition but rather is a clarification as to how the licensee is to demonstrate compliance to the NOC conditions. It is suggested that the resume work strategy be deleted from Table 1.1. Perhaps it is more appropriate to include the resume work strategy in the Statement of Basis.	3	See comment response to #132
135	2	59	5.0	The conditions listed for MHPP NOC do not match the approval. Remove new or modified approval conditions	3	The conditions in the AOP were compared to the original AIR letter. Although the database numerical references are different, the conditions were accurate. Note: However, to data entry errors were discovered and corrected.
136	2	62	5.0	Delete the top entry (AIR 00-302, 3/3/00, ALARACT agreement, NOC_ID 432) as listing ALARACT agreements is not consistent with Section 2.2, page 2-4.	3	Excluded from AOP
137	2	62	5.0	Remove ALARACT Demonstration (I.e., for Cementation). The listed ALARACT Demonstration is not subject to this section.	3	See response to #136
138	2	62	5.0	The conditions listed for the Vertical Calciner NOC do not match the approval. Remove new approval conditions	3	The NOC was approved based on the condition that the operation of the calciner was as descried in the NOC and that the scope of work and the liquid waste streams were restricted as specifically described in the NOC. These conditions are consistent with the intent of this approval.
139	2	62	5.0	The conditions listed for the PFP Duct Work and Process Piping NOC do not match the approval. Remove new approval conditions	3	Comment noted. All but condition#4 deleted.
140	2	62	5.0	The conditions listed for the PFP Stabilization of Pu Metal Oxides in the Muffle Furnaces NOC do not match the approval. Remove new approval conditions	3	See comment response # 141
141	2	63	5.0	AIR 96-1205, 12/18/96, NOC_ID 209: These 4 "conditions" are statements of fact rather than approval conditions. They should be removed as certifying compliance with them would be meaningless.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
142	2	64	5.0	296-Z-7: The conditions numbers in this draft AOP are not consistent with those in approval letter AIR 00-709. Make the conditions numbers consistent.	3	See comment response to #103
143	2	64	5.0	(2-64 thru 2-67) The current W-460 AOP conditions do not match the W-460 approval conditions (and some conditions changed the actual degree limits). Remove new or incorrect approval conditions.	3	The conditions in the AOP were compared to the original AIR letter. Although the database numerical references are different, the conditions were accurate with the noted exceptions. Note: Three conditions were changed wherein the superscript font used to represent degrees was not in superscript format and resulted in a misrepresentation of the required value. This was corrected.
144	2	66	5.0	296-Z-7: Condition numbers 29 and 40 (pg. 2-67): The temperature should be 40 degrees C rather than 400 C as shown.	3	Comment noted. Error corrected.
145	2	67	5.0	296-Z-7: Condition number 42: The temperature should be 13 degrees C rather than 130 C as shown.	3	Comment noted. Error corrected.
146	2	69	5.0	The NOC Revision Approval dated 1/20/99 is missing. This revision approval contained one condition, "collect airborne effluent samples biweekly at a minimum".	3	Comment noted. Condition identified was in with AIR letter 93-907condition list. This condition was removed and place with the add NOC revsion.
147	2	72	5.0	Emission Units Specific Applicable Requirements Tables: Emission Point: EP-325-01-S - Abatement Technology, Additional Description/Conditions: Edit description of fan configuration as follows:"4 in parallel (3 operational, 1 backup)"	3	Health agrees and will make the requested changes.
148	2	72	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: Modification to the Tritium Target Qualification Program Radiochemical Processing Laboratory 325 Building, 300 Area Permit No.: AIR 00-208 Recommend that the conditions stated in the AOP be idenified with the same number as used in the NOC approval orders (i.e., AOP condition #1 is condition #30 in the NOC approval order). It's recognized that this is a minor point, however if allowed to remain, it will likely lead to confusion when incorporating furture NOC revisions, completing annual compliance certifications, etc...). Similar situation exist for other PNNL approval orders and should be corrected: AIR 98-909.	3	Comment noted. See response to comment #103.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
149	2	74	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: 325 Building Hazardous Waste Treatment Unit (HWTU) Permit No.: AIR 98-909 Make the following editorial corrections as indicated in order to reflect the condition as stated in the NOC approval order. AOP Approval Condition 2: "Hazardous materials and radioactive mixed wastes will be stored, dispensed, used, handled, packaged in ~~durms~~ drums and treated ..." AOP Approval Condition 7: "When this project is completed, or operations cease, the facility shll notify the department via a report of closure, including whether or not any potential for airborne release~~s~~ occurrs~~ed~~ (WAC 246-247-080(6))." AOP Approval Condition 13: Add end parenthesis to sentence. "...(WAC 246-247-075(12))." AOP Approval Condition 14: Condition is not as stated in the NOC approval order. Edit as indicated. "The department reservers the right to inspect and audit this unit during construction and operation,. This includinges all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1))."	3	Health agrees and will make the requested changes.
150	2	76	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: Modification to the Annual Possession Quantity of the 325 Building Permit No.: AIR 98-807 (08/20/98) Condition 1: Delete. Condition not listed in NOC approval order. Condition 2: Correct PTE to read as stated (5.85E-3) in the approval order AIR 98-909. Condition 3: Delete. Condition not listed in NOC approval order. Add the following condition as stated in WDOH approval: "All conditions and limitations of NOC Letter AIR 96-604 will stay the same and be adhered to."	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
151	2	76	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: Transfer Strontium-90 from the 324 Building to the 325 Building Permit No.: Shortform Approval (01/19/98) Condition 2: In order to avoid any confusion as to which issuance of the ANSI N13.1 is applicable, indicate as noted in the short form application, that the sample system is designed and constructed in conformance with ANSI N13.1 (1969). "Monitoring is continuous. The sampling system is designed and constructed in conformance with ANSI N 13.1 **(1969)**. Sample are analyzed for gross alpha and gross beta, and specific radionuclides, including ^{90}Sr".	3	Health agrees and will make the requested changes.
152	2	76	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: Removal of 3rd State HEPA Filter, 325 Building Permit No.: RTAM (11/14/95) AOP Condition 1: Correct the number of fans and delete reference to additional controls. The controls stated are applicable to specific projects only (TTQP - NOC # AIR 00-208). 1. Control Technology: 2-high efficiency particulate air filters (2 in series), ~~3~~ 4 fans (~~2~~ 3 in parallel, 1 backup). "~~Additional controls: 2 stage bubbler-type trapping system, molecular sieves"~~	3	Health agrees and will make the requested changes.
153	2	76	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: Applied Chemistry, 325 Building LLW Vitrification Research Program Permit No.: AIR 96-604 AOP Condition 3: Correct reference to the number of fans. 3. Control Technology: 2-high efficiency particulate air filters (2 in series), ~~3~~ 4 fans (~~2~~ 3 in parallel, 1 backup).	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
154	2	78	5.0	Emission Units Specific Applicable Requirements Tables: 1) Delete the table of controll equipment as areas 1, 2, 3, and 4 are not in either the NOC Application or approval letter. 2) Use the following for a new table of control equipment: Inhalation suite (glove boxes & fume hoods) HEPA 2 in series; 3rd floor fume hoods HEPA 1; Rooms 101-107 glove box HEPA 2 in series fume hood/chambers HEPA 1	3	Health agrees and will make the requested changes.
155	2	78	5.0	Emission Units Specific Applicable Requirements Tables: Project Title: Life Sciences Laboratory I (Building 331) Modifications Permit No.: AIR 98-108 (01/21/98) <u>Condition 2:</u> In order to avoid any confusion as to which issuance of the ANSI N13.1 is applicable, indicate as noted in the application, that the sample system is designed and constructed in conformance with ANSI N13.1 (1969). "Emission unit EP 331-01-V must use an isokinetic sampling probe with design specification meeting ANSI N31.1 (1969)."	3	Health agrees and will make the requested changes.
156	2	79	5.0	Emission Units Specific Applicable Requirements Tables: 1) Top of page: Add "(1969)" after N 13.1 to avoid confusion with anyother ANSI Standard. 2) Move the AIR 95-803 project title below the 3/12/96 RTAM project title. 3) Move the AIR 96-506 project title below the 5 listed conditions. 4) Change EP 331-01-V to EP 331-02-S. 5) Delete condition #5 "If measurement requirements...must be approved." as it is not in the approval letter.	3	Comments accepted. These approvals listed with EP 331-02-S per telecon with PNNL.
157	2	79	5.0	Project Title: Portable Radon Research Facility Permit No.: AIR 96-506 (05/15/96) Approval conditions should be stated as follows: 1. The potential to emit from the Radon Generating Facility must not, when added to another source therm, affect the NESHAPS status of the emission unit without writing a new NOC to WDOH and to the EPA. 2. All controls, or equivalent, committed to in the original NOC are required. If changes are planned, approval must be sought for the WDOH.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
158	2	82	5.0	Emission Units Specific Applicable Requirements Tables: Emission Point: EP-3720-01-S Edit "Additional Description/Conditions" section regarding the number of fans as indicated. "**1 operational**, 1 backup"	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
159	2	83	5.0	Attachment 2 - Add the following NOC approvals: Use of an ultra high pressure water lance to install saltwell pumping equipment in Tank 241 BY-105, AIR 00-207, 2/22/00 Isolation of Exhauster 296-P-17 from Tank 105-A in the 241-A Tank Farm, Shortform approval, 9/15/99 Addition of Caustic To Tank 107-AN, RTAM, 4/14/94 Tank Farm Waste Transfer Pit 244-TX Double Contained Receiver Tank (DCRT), NOC Revision approval, 4/27/00 Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping, Rev 2, NOC Revision approval, 6/17/99 (NOTE: This approval applies to three emission points 296-P-43,44, and 45) Vapor Sampling of Miscellaneous Underground Units, NOC Revision approval, 6/26/00 Tank Waste Remediation Vadose Zone Characterization, NOC Revision approval, 6/21/00 Use of a Portable Exhauster at 244-AR Vault, AIR 97-1007, 10/9/97 Portable Exhauster Use on Single Shell (SST) Tanks During Saltwell Pumping, Addition of Tanks 241-A-101, 241-U-102 dated 7/31/99 (NOTE: This approval applies to three emission points 296-P 43,44, and 45).	3	*Use of an ultra high-pressure water lance to install saltwell pumping equipment in Tank 241 BY-105, AIR 00-207, 2-22-00*----This can be found as NOC 429, emission unit BY105. *Isolation of Exhauster 296-P-17 from Tank 105-A in the 241-A Tank Farm, Shortform approval, 9-15-99*---This can be found as NOC 393, emission unit 296-P-17. *Addition of Caustic To Tank 107-AN, RTAM, 4-14-94. This i*s NOC 38, 296-A-29. RTAM approval date 6-8-94. *Tank Farm Waste Transfer Pit 244-TX Double Contained Receiver Tank (DCRT), NOC Revision approval, 4-27-00.* This is an application change. No change to conditions. Excluded from AOP. *Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping, Rev 2, NOC Revision approval, 6-17-99*---This can be found as NOC 372, emission units 296-P-43, 296-P-44, 296-P-45. This NOC is obsolete. *Vapor Sampling of Miscellaneous Underground Units, NOC Revision approval, 6-26-00*. It is in the AOP as NOC 489 under emission unit, 200 area emissions. *Tank Waste Remediation Vadose Zone Characterization, NOC Revision approval, 6-21-00.* In the AOP as NOC 455, under emission unit, Vadose Zone Characterization. *Use of a Portable Exhauster at 244-AR Vault, AIR 97-1007, 10-9-97*---was attributed to emission unit 296-P-32. This NOC is obsolete. *Portable Exhauster Use on Single Shell (SST) Tanks During Saltwell Pumping, Addition of Tanks 241-A-101, 241-U-102 dated 7-31-99*---This can be found as NOC 380, emission units 296-P-45, 296-P-44, and 296-P-43.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
160	2	83	5.0	NOTE: The following NOC approvals should be added to the draft AOP. Guzzler Excavation and Backfilling Activities in Support of the 200 East Area A Farm Complex, 12/23/97 Isolation of Exhauster 296-P-17 from Tank 105-A in the 241-A Tank Farm, NOC Revision approval, 12/9/99 Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping, Rev 2, NOC Revision approval #4, 6/26/00 (NOTE: This approval applies to three emission points 296-P-43,44, and 45) Tank Farm Restoration and Safe Operations-Rev 5 (Project W-314), NOC Revision approval, 11/2/00 Tank Waste Remediation Vadose Zone Characterization, NOC Revision approval, 11/9/00	3	*Guzzler Excavation and Backfilling Activities in Support of the 200 East Area A Farm Complex, 12-23-97* --This can be found as NOC 250 as emission unit, Guzzler use on the Hanford Site. *Isolation of Exhauster 296-P-17 from Tank 105-A in the 241-A Tank Farm, NOC Revision approval, 12-9-99* --This can be found as NOC 416 as emission unit, 296-P-17. *Portable Exhauster Use On Single Shell (SST) Tanks During Saltwell Pumping, Rev 2, NOC Revision approval 4, 6-26-00*—This process change affected only the application and did not change an approval condition. *Tank Farm Restoration and Safe Operations-Rev 5 (Project W-314), NOC Revision approval, 11-2-00* --- This process change affected only the application and did not change an approval condition. *Tank Waste Remediation Vadose Zone Characterization, NOC Revision approval 11-9-00.* This can be found as NOC 454, emission unit, Vadose Zone Characterization. Regarding comments 215 and 216: Comment 216. NOC obsolete. Temporarily the generator was in the 329 building but has been moved to the 326 building. Comment 215. Added to database. NOC ID 467, emission unit (did not give one ???)
161	2	83	5.0	General Comment: In many cases where there is a listed NOC Revision approval, the Agency has referenced the original AIR approval letter number. This creates confusion because it appears as though the AIR approval date is the same date as the NOC Revision approval (Example: The Categorical Tank Farm Entry NOC Revision approval references Permit No. AIR 00-604 and has an approval date of 7/12/00. However, AIR 00-604 has an approval date of 6/21/00 and not 7/12/00.) It is suggested that, wherever a NOC Revision approval references the original NOC approval, the original AIR approval reference should be deleted to minimize confusion.	4	Comment noted. In most cases the NOC revisions are listed separately. Most of these revisions only partly affect an NOC approved activity, so the initial approval document reference and the unaffected conditions and limits are retained.
162	2	87	5.0	AIR 98-614, 6/30/98, NOC_ID 282: Delete condition #7 ("NOTE: There is no condition #14.") as there is a condition #14	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
163	2	87	5.0	296-A-26 lists upgrade of 241-AN Tank Farm exhauster fans as an associated activity, which it is not. Please correct.	3	Health agrees and will make the requested changes.
164	2	87	5.0	296-A-26, The applicable facility for this emission point is the 204 AR Railroad Unloading Facility and not the 241-A-Tank Farm.	3	Comment noted. Identified to 204 AR BLDG.
165	2	87	5.0	296-A-26, The NOC Permit No. AIR98-614 is related to the 241-AN Farm exhauster 296-A-29. AIR 98-614 required that work commence within two years. Since this did not occur, NOC approval AIR 98-614 should removed from the draft AOP.	3	Health agrees and will make the requested changes.
166	2	89	5.0	296-P-41, This emission point is inactive and should noted as inactive or removed from Table 1.2.	3	Health agrees and will make the requested changes.
167	2	92	5.0	AIR 00-701, 7/9/00, NOC_ID 449: Two conditions are missing: 1) The TEDE to the MEI from transfer pipe cuts will not exceed 3.34E-02 mrem/year. The annual possession quantity (APQ) shall not exceed 6.79E+02 curies. The annual dose to the MEI and APQ will be tracked on a WDOH approved log., and 2) The TEDE to the MEI from soil excavation by hand digging will not exceed the calculated annual dose of 1.61E-02 mrem/year, and will be performed in accordance with ALARACT 5 TWRS ALARACT Demonstration for Soil Excavation (using hand tools). The APQ shall not exceed 2.65E+01 curies. The annual dose to the MEI and the APQ will be tacked on a WDOH approved log.	3	Comment accepted. Missing conditions added.
168	2	93	5.0	296-A-29, The approval date of 6/8/94 for the RTAM approval for the "Installation of a small mixer pump to support routine pH adjustment in Tank 107-AN" should be re-checked. The reviewer's records indicate that the approval date is 4/14/94.	3	The mixer pump approval date of 6/8/94 for the RTAM is correct. The 4/14/94 meeting was used to introduce the project. But the meeting minutes of 4/14 reflect the fact that the next RTAM date(6/8) would be used to approve the project since no notice of construction had been prepared.
169	2	99	5.0	296-A-18, The emission point description should be noted as "241-AY Tank Farm"	3	These identifiers are used as a reference to associate stacks in a general area.
170	2	100	5.0	296-A-19, The emission point description should be noted as "241-AY Tank Farm"	3	See response to comment # 169
171	2	101	5.0	Page 2-101, 296-A-20 is listed as requiring an NOC prior to restart. Why? The facility is active. The exhauster may be shut down , but is needed. Please remove this wording.	3	We consider a facility's change in status after two years of not operating a change in the method of operation under WAC 246-247 030(16).
172	2	101	5.0	296-A-20, The emission point description should be noted as "241-AZ Tank Farm"	3	See response to comment # 169
173	2	102	5.0	296-A-43, The emission point description should be noted as "241-AZ 702 Bldg Exhauster"	3	See response to comment # 169

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
174	2	108	5.0	AIR 98-704, 7/9/98, NOC_ID 284: Duplicate conditions, conditions 1 & 3 are the same and conditions 2 & 4 are the same. Suggest deleting both conditions 1 & 3 as condition 1 in AIR 98-808 (NOC_ID 296, page 2-107) covers the requirement and correctly identifies the isotope as Pu238 (rather than Pu338).	3	Health agrees and will make the requested changes.
175	2	110	5.0	200E W-PORTEX 030, The NOC approval (AIR 00-106) associated with this emission point is incorrect. The emission point is not a portable exhauster but exhausts through existing stack 296-A-40. Move the NOC approval order AIR 00-106 to emission point 296-A-40.	3	Health agrees and will make the requested changes.
176	2	117	5.0	Page 2-117, item 14 gives an abated dose of 0.075. This is incorrect. It should be the unabated dose. As listed, one could come to the conclusion that the unabated dose would be above 0.1 mrem, which would require continuous measurement per 40 CFR 61.93, yet, item 17 only requires periodic confirmatory samples. Please correct.	3	The abated does in item 14is 0.057 mrem/year to the MEI. This is verbatim with the Approval letter AIR 00-206. The permit can only reflect the information in the underlying applicable requirement.
177	2	120	5.0	In the upper left hand corner are found the words 'All plants'. This is a specific emission unit, with a unique ID number and unique conditions. It should be specific to the 222-S Laboratory Complex or 219-S Waste Handling Facility.	1	Portable exhausters may be relocated and placed into service elsewhere on site once the current assigned activity has ended.
178	2	121	5.0	AIR 99-1003, 10/6/99, with its 25 approval conditions applies to W PORTEX 027 (241-UX-154 Diversion Box) rather than this emission point (W PORTEX 026). The listing for W PORTEX 026 is a NOC Revision Approval dated 9/5/00.	3	Health agrees and will make the requested changes.
179	2	121	5.0	200E W-PORTEX 026, Portable Exhauster on Pit 244-TX- DCRT, The NOC approval AIR 99-1003 is not correct and should be deleted. AIR 99-1003 relates to the approval for the 241-UX-154 Diversion Box (pg 2-164). The reviewer believes that it was intended for the Permit No. reference to be AIR 99-1002.	3	Health agrees and will make the requested changes.
180	2	122	5.0	AIR 99-1002, 10/6/99, NOC_ID 403: Delete conditions 2, 4, 21, and 27 as they are not contained in this approval order. (See record #7 in the AOP Application Supplement.)	3	Health agrees and will make the requested changes.
181	2	122	5.0	200E W-PORTEX 026, Portable Exhauster on Pit 244-TX- DCRT, AIR 99-1002, Conditions #2, #4, #21, and #27 are carry-overs from AIR 99-805. The AIR 99-1002 approval dated 10/6/99 voided AIR 99-805 and reissued new approval conditions. These Conditions as noted should be deleted from the AIR 99-1002 approval conditions.	3	Health agrees and will make the requested changes.
182	2	129	5.0	AIR 00-706, 7/24/00, NOC_ID 487: Delete this NOC approval as it applies to 200 Area fugitive emissions (see page 2-241) rather than the point source 296-E-1.	3	Health agrees and will make the requested changes.
183	2	131	5.0	AIR 00-706, 7/24/00, NOC_ID 487: Delete this NOC approval as it applies to 200 Area fugitive emissions (see page 2-241) rather than the point source LERF Basin #42.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
184	2	133	5.0	AIR 00-706, 7/24/00, NOC_ID 487: Delete this NOC approval as it applies to 200 Area fugitive emissions (see page 2-241) rather than the point source LERF Basin #43.	3	Health agrees and will make the requested changes.
185	2	134	5.0	AIR 00-706, 7/24/00, NOC_ID 487: Delete this NOC approval as it applies to 200 Area fugitive emissions (see page 2-241) rather than the point source LERF Basin #44.	3	Health agrees and will make the requested changes.
186	2	139	5.0	Permit No., 9/16/99, NOC_ID 397: This entry should be deleted as it was only a concurrence by Health to use a proposed release factor of 6.6E-08 when developing the NOC for reactivation of PUREX Storage Tunnel Number 2 and Upgrade to 296-A-10 Stack Monitoring System.	3	Excluded from AOP per comment.
187	2	140	5.0	For consistency, the sampling frequency should be changed on page 2-141. The sampling frequency should read '4 week sample/year' as found on Page 2-140.	1	Health agrees and will make the requested changes.
188	2	141	5.0	The Hot Cell Addition project is complete. Delete Condition 1?	3	Obsolete issue corrected.
189	2	141	5.0	Conditions 2 and 3 were not included in approval letter AIR-Feb11.	3	AIR-Feb11 states the approval is based on the information that was provided in the application. These conditions come from that application.
190	2	141	5.0	AIR-Feb11, 2/28/92, NOC_ID 10: Condition #1 ("Prior to operation…in the lab,") was obsolete as of 3/29/94.	3	Obsolete issue corrected.
191	2	142	5.0	This is a blank page as printed. Blank pages in the body of the permit should be eliminated to avoid confusion.	1	Comment noted. This problem will be corrected.
192	2	143	5.0	The condition for the NOC revision included a statement which would allow log sheets to be submitted exclusive of estimated emissions. That statement is missing.	3	Health agrees and will make the requested changes.
193	2	153	5.0	Permit No., 3/11/99, NOC_ID 348: This entry should be deleted as it was only a telecon clarification that adjusted the Table 13-1, "Emissions Control Equipment Compliance For Portable Exhausters" regarding a delay in performance of the 168 performance test as required in accordance with 40 CFR 52, Appendix E Test Methods.	3	Excluded from AOP per Comment
194	2	153	5.0	296-P-43, The emission point description should be noted as "SST Saltwell Pumping" and not "241-SY Tank Farm".	3	This identifier is associated with a location not an activity.
195	2	156	5.0	296-P-44, The emission point description should be noted as "SST Saltwell Pumping" and not "241-SY Tank Farm".	3	See comment response to # 194
196	2	158	5.0	This is a blank page as printed. Blank pages in the body of the permit should be eliminated to avoid confusion.	1	Comment noted. This problem will be corrected.
197	2	159	5.0	AIR 98-1207, 12/16/98, NOC_ID 327: This NOC approval only contains 20 conditions rather than the 40 that appear here. Delete the other 20 duplicate conditions.	3	Health agrees and will make the requested changes.
198	2	159	5.0	296-P-45, The emission point description should be noted as "SST Saltwell Pumping" and not "241-SY Tank Farm".	3	See comment response to #194.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
199	2	163	5.0	296-S-25, This stack is not running and should be noted as "intermittent operation"	3	Health agrees and will make the requested changes.
200	2	164	5.0	AIR 99-1003, 10/6/99, NOC_ID 401, condition #1 "The radionuclides and…the following table.": There is no "…following table." Provide the referenced table.	3	Health agrees and will make the requested changes.
201	2	169	5.0	NOC Revision Approval, 1/4/00, NOC_ID 419: The 2 approval conditions are missing: 1) Weekly smear sampling of 30 NucFil® filters is no longer required., and 2) Periodic confirmatory measurement is a quarterly air sample collected for a two-week interval.	3	Condition included per comment
202	2	172	5.0	AIR 99-1006, 10/18/99, NOC_ID 405: Delete this approval letter as there are no NOCs against this emission point (296-Z-10 stack). AIR 99-1006 concerns a Health denial of a request to use a release fraction of 2.5E-14 for calculating releases from vented containers.	3	Excluded from AOP
203	2	172	5.0	This emission unit is shut down and there are no plans to restart the stack. This emission unit should be removed from the AOP since there are no requirements that are listed in the AOP. If required to list in AOP, the facility/plant name is 231-Z and not PFP.	3	Health agrees and will make the requested changes.
204	2	174	5.0	296-Z-15, Remove new approval conditions. These conditions are captured in the table above.	3	Approval is based on the information that was provided in the application. These conditions come from that application.
205	2	175	5.0	296-Z-3: The RTAM dated 2/23/99 ("PFP Agitator/Sample Probe Repair (Tanks D-5 and D-8) at the 241-Z Building") is now completed and should be removed from Attachment 2.	3	Health agrees and will make the requested changes.
206	2	177	5.0	296-Z-5: Use the exact title from AIR 00-709 (Plutonium Finishing Plant Project W-460, "Plutonium Stabilization and Handling").	1	Health agrees and will make the requested changes.
207	2	178	5.0	296-Z-6: Use the exact title from AIR 00-709 (Plutonium Finishing Plant Project W-460, "Plutonium Stabilization and Handling").	1	Health agrees and will make the requested changes.
208	2	180	5.0	296-S-2 Stack: Emission Unit ID 336: Remove this stack from the DOH License as this stacked has been closed. A letter was sent out to de-register the stack on September 18, 2000 and was not forwarded to WDOH due to an administrative error. A replacement letter will be transmitted to WDOH within two to three weeks.	3	Health agrees and will make the requested changes.
209	2	183	5.0	Correct Abatement Technology to read; Fan 2 in series, 1 in parallel, (when two fans in series operate, the fan in parallel is in backup and vice versa.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
210	2	188	5.0	WDOH Notice of Construction approval conditions and limitations (AIR 00-708, dated 7/27/00) in the draft AOP for the 300 Area Process Sewer Clean Out do not match those on file (hard copy) at 310 TEDF. Specifically, conditions 1 and 6 through 26 are not consistent. Ensure all conditions are consistent between the draft AOP and hard copy WDOH letter AIR 00-708.	3	See comment response #103.
211	2	191	5.0	300 Z-TEDF 001 should be removed from the AOP. WDOH letter AIR 97-404, dated 4/15/97, documented the determination that the 310 TEDF was not an emission unit.	3	Health agrees and will make the requested changes.
212	2	192	5.0	304-CON-EX: As of April, 1994, this unit is no longer in service. Delete this entry.	3	Health agrees and will make the requested changes.
213	2	193	5.0	Emission Units Specific Applicable Requirements Tables: Emission Point: EP-305B-01-~~V~~ S * Correct Emission Point identification number as indicated: EP-305B-01-~~V~~ S * Under "Monitoring Requirements" section, change the Sampling Frequency for "2 week sample/year" to "Continuous".	3	Emission point id corrected. The monitoring requirements are a minimum and do not preclude more monitoring than is required..
214	2	197	5.0	Emission Units Specific Applicable Requirements Tables: Emission Point: EP-318-01-S AOP Approval Condition 1: Delete sentence as indicated. Deleted words are not part of NOC approval. "1. Annual possession quantity of radionuclides: inventory unchanged ~~and in project files~~.	3	Health agrees and will make the requested changes.
215	2	203	5.0	Emission Units Specific Applicable Requirements Tables: Emission Point: EP-326-01-S This emission unit has 2 active Notice of Construction approvals. Please add: Project Title: Movement of Radon Generator Project from 329 Building to 326 Building Permit No.: RTAM Approval Date Approved: 03/21/2000	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
216	2	206	5.0	Emission Units Specific Applicable Requirements Tables: Emission Point: EP-329-01-S This emission unit has 2 active Notice of Construction approvals. Please add: Project Title: Temporary Use of Radon Generator in 329 Facility Permit No.: RTAM Approval Date Approved: 12/07/1999	3	This NOC approval is obsolete. See comment and response #215
217	2	210	5.0	Emission unit 300 P-340BBLDG-001 is currently inactive. WDOH letter AIR 99-713 requires this emission unit status to be included in the AOP, or monitoring and testing will have to be maintained. However appropriate, ensure the status of this emission unit is identified in the draft AOP as "inactive, monitoring is not currently performed".	3	Health agrees and will make the requested changes.
218	2	217	5.0	AIR 95-204, 2/24/95, NOC_ID 65: Both of the listed conditions are obsolete and should be deleted from the license.	3	Obsolete issue corrected
219	2	221	5.0	During the 11/7/00 RTAM, Al Conklin approved an NOC revision to the WSCF NOC. It involved temporary storage in the Environmental Sample Archive Building (page 2-223). The revision is missing.	3	The revision addressed a change to a section in the application describing the Environmental Sample Archive Building. No approval conditions were affected. This revision would be excluded from the AOP on that basis.
220	2	221	5.0	(221 to 230, 261 to 265) The conditions are included for both point source and non-point source emission units. It should contain only the conditions for point sources.	3	Non-point reference 023 was a typo. It has been change to read 032. The underlying AIR letter was structured listing a condition to each of the named emission units. It is evident which requirement is associated with each stack.
221	2	224	5.0	Number 21 is repeated from the previous page. Will affect numbers on the remaining conditions.	1	Comment noted. Errors will be corrected.
222	2	225	5.0	The new WSCF NOC replaced the old NOC. Delete the NOC dated 6/11/90.	3	Health agrees and will make the requested changes.
223	2	225	5.0	NOC Revision Approval, 3/19/99, NOC_ID 349: This NOC Revision Approval only modified text in Section 1.0 of the NOC application, and should therefore be deleted from the license. There were no new or modified approval conditions.	3	Exclude from AOP
224	2	230	5.0	NOC Revision Approval, 3/19/99, NOC_ID 349: This NOC Revision Approval only modified text in Section 1.0 of the NOC application, and should therefore be deleted from the license. There were no new or modified approval conditions.	3	Health agrees and will make the requested changes.
225	2	231	5.0	AIR 98-1215, 12/18/98, NOC_ID 328: This approval order contains 25 approval conditions that are different from the 4 approval conditions shown here.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
226	2	232	5.0	Short Form NOC, 12/23/97, NOC_ID 250: This shortform NOC applies to emission point 200E W-PORTEX 001 rather than this emission point (Hanford Sitewide W-PORTEX 021).	3	This is an activity tracking issue. Many of the Portable IDs were generated on site to track approved activities to a EU ID, and not more appropriately attributed to the NOC. We have combined these activities under the former portex names 001, 12, 13, 14, 15, 16, 17, 18, under a site wide Portex 021. Now when an associated activity is complete, the NOC properly becomes obsolete and not the emission unit.
227	2	235	5.0	AIR 00-706, 7/24/00, NOC_ID 487: Delete this entry as AIR 00-706, with its 28 conditions, is for the fugitive/diffuse emission point 200 Area Emissions (see page 2-241) rather than this emission point, Hanford Sitewide W-PORTEX 007.	3	Health agrees and will make the requested changes.
228	2	235	5.0	RTAM, 2/15/00, NOC_ID 425: This approval has 21 conditions rather than the 5 listed here.	3	The RTAM 2/15/00 only modified 4 conditions from the approval letter AIR 99-1103. These 4 (not 5) are accurately listed in the AOP. The AIR letter 99-1103 has 22 not 21 conditions. This missing condition has been added to the AOP by a previous comment. The 4 conditions modified by the RTAM 2/15/00 are now obsolete and will not appear when the AOP is issued.
229	2	235	5.0	HEPA Vacuums, Emission Unit ID 455, 10/24/97 Agreement: The routine use agreement dated 10/24/97 should be included in the Statement of Basis with the other ALARCT Agreements.	3	As these are not true ALARACT demonstration, but approval terms and conditions documented in meeting minutes, they are appropriate to the permit. The ALARACTs are also required permit terms (ref. Sect 5.0 subsection 2.2 in the draft AOP), like an operating manual the text is relegated to the Statement of Basis.
230	2	236	5.0	AIR 99-1103, NOC_ID 410: Delete this approval order as it became obsolete 2/15/00 (replaced by 2/15/00 RTAM with 21 conditions).	3	Obsolete issue corrected.
231	2	236	5.0	HEPA Vacuum Radioactive Emission Units, Rev. 1 conditions and limitations identified in the draft AOP do not match those on file (hard copy) at 310 TEDF (AIR 99-1103, dated 11/4/99). The copy on file at 310 is identified as "Clarification for HVU NOC Approval Conditions", NOC MOD ID #444. Specifically, conditions 1 and 6 through 26 are not consistent. Ensure all conditions are consistent between the draft AOP and hard copy WDOH letter AIR 00-1103.	3	As the commenter is probably aware, the database numerical references are different in the draft. However, in comparing the draft to the AIR letter 99-1103, we noted condition #13 from the hard copy was missing in the draft. We have corrected this omission. The RTAM 2/15/00 previously listed in the draft contained revised conditions that made obsolete draft conditions #7, #12, #15, and #17. These have been removed from the permit.
232	2	238	5.0	Editorial: (pg 238-240) 1) Identify the difference between condition 3 and condition 16. They appear to be the same. 2) In condition 9, "ans" should be "and".	1	Comment noted. Deletion and correction made.
233	2	238	5.0	We call this emission point "Sitewide PTRAEU" rather than "Hanford Sitewide type-1, type-2, type-3".	3	Health agrees and will make the requested changes.
234	2	238	5.0	Hanford Sitewide type-1, type-2, type-3 PTREAU NOC, p 2-238-240 - No period is specified under "sample frequency". Identify the frequency (ie. for type 1, annual unless otherwise specified by the NOC).	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
235	2	239	5.0	2-239 and 2-240, PTRAEU, Emission Unit ID 447, AIR 99-1102: Condition #16 is obsolete as it was replaced by condition #3 in the 2/15/00 RTAM. Delete condition #16.	3	Health agrees and will make the requested changes.
236	2	241	5.0	AIR 00-706, 7/24/00, NOC_ID 487: It appears that conditions from one or more PFP NOC approvals were shuffled in with the 28 approval conditions from AIR 00-706. Only the 28 AIR 00-706 approval conditions should appear here. Delete all others.	3	Health agrees and will make the requested changes.
237	2	241	5.0	1330-N Permacon: Emission Unit ID 186: Delete this emission unit as it has been closed out. A letter of closure was submitted to WDOH.	3	Health agrees and will make the requested changes.
238	2	241	5.0	Waste Transfer from the Vit Plant to LERF and TEDF, Project W-519, AIR 706 AIR 00-706 contained 28 approval conditions. The draft AOP is showing 63 approval conditions. The approval conditions associated with AIR 00-706 appear to be mixed with another approval order for PFP. This needs to be corrected.	3	Corrected noted. Correction made.
239	2	246	5.0	AIR 00-604, 7/21/00, NOC_ID 491: Change the permit number from AIR 00-604 to "NOC Revision Approval". AIR 00-604 (NOC_ID 486) with its 31 conditions is properly shown on page 2-248.	3	Added NOC revision in front of AIR 00-604 in permit number field.
240	2	250	5.0	200 J. NONPOINT 024, Borehole 41-09-39 The activity associated with this NOC approval (5/7/99) is complete and should be moved to the Statement of Basis.	3	Health agrees and will make the requested changes.
241	2	250	5.0	200 J-NONPOINT 025, Vadose Zone Characterization, NOC revision form approvals dated 6/21/00 (rotating brush) and 11/9/00 (cable tool drilling process)[see AIR 00-1104] need to be added to the draft AOP.	3	Comment noted. Revision 6/21/00 added. The 11/9/00 approval is excluded from the AOP as it addressed only the process in the application. No approval conditions were applied with this approval or addressed previously issued approvals.
242	2	251	5.0	200 J-NONPOINT 025, Vadose Zone Characterization, AIR 00-515, Condition #4 of AIR 00-515 (5/26/00) identifies five other registered emission points (200 P-Vadose 001, 200 P-Vadose 002, 200 P-Vadose 003, 200 P-Vadose 004, and 200 P-Vadose 005) associated with the NOC approval. The reviewer does not find these emission points in the draft AOP. Those with a powered exhaust should appear in Attachment 2, Table 1.2.	3	See response to comment #226.
243	2	252	5.0	NOC Revision Approval, 11/1/99 NOC_ID 409: Delete all but condition #4. This NOC Revision Approval contains only one condition. That condition appears here as condition #4.	3	Health agrees and will make the requested changes.
244	2	252	5.0	200 J-NONPOINT 025, Vadose Zone Characterization, NOC Revision 11/1/99, The listed approval conditions associated with the 11/1/99 NOC Revision are incorrect. It appears that the Conditions are a duplicate of those for NOC Revision approval dated 8/23/99. The 11/1/99 NOC Revision approval conditions should be corrected to reflect the change to Section 6 and Section 8 (discussion of sleeve casing) of the NOC application.	3	Comment noted. Inapplicable conditions deleted. See subsequent comments.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
245	2	253	5.0	NOV Revision Approval, 8/23/99, NOC_ID 387: This NOC Revision Approval has only 4 conditions. Condition #5 is from the 11/1/99 NOC Revision Approval.	3	Comment noted. Condition #5 deleted.
246	2	253	5.0	200 J-NONPOINT 025, Vadose Zone Characterization, NOC Revision 8/23/99, This NOC Revision approval had four approval conditions. It appears that a Condition #5 has been added. The first four paragraphs seem to be just descriptive in nature of the process. The last paragraph states that Condition #21 of AIR 99-701 should now read: "For casing removal…….in a burial box". However, Condition #21 does not state this. It is believed that it instead should read "The last paragraph of #17". However, the discussion of the Bowen Casing Cutter (or equivalent) is missing and the last five sentences of AIR 97-701, Condition #21 were omitted. The basis for the addition of Condition #5 should be explained and the last paragraph as suggested should reflect current language regarding the casing removal description as approved on NOC Revision approval dated 11/1/99.	3	Comment noted. Condition #5 deleted (see previous response). Descriptive conditions are verbatim from the underlying approval letter. Reference to condition #21 is to condition #21 in AIR letter 99-701. Missing text has been added.
247	2	256	5.0	AIR 99-701, 7/14/99, NOC_ID 379: Condition #15 ("Emissions from air rotary…") was obsolete affective 11/17/00.	3	Obsolete issue corrected.
248	2	257	5.0	AIR 99-701, 7/14/99, NOC_ID 379: Condition #17 ("Activities under this NOC are limited…") was obsolete affective 11/1/99.	3	Obsolete issue corrected.
249	2	259	5.0	200E J-NONPOINT 001, Cross-site transfer line: This non-point source emission point should be removed from the permit. NON-point source 200E J-NONPOINT 001 is specific to the cross-site transfer line project. The project was completed 2/17/99.	3	Health agrees and will make the requested changes.
250	2	259	5.0	200 West Burial Grounds, 200W P-Trench31 001: Add the RTAM dated 7/13/99 to this emission point. This RTAM applied equally to Trench 31 and Trench 34. (It is listed for Trench 34.)	3	Health agrees and will make the requested changes.
251	2	259	5.0	The following Non-point sources have no associated conditions for periodic confirmatory measurement. 200E P-241AR151-001, pg 2-259 200E J-NONPOINT 001, pg 2-259 200E P-241AX155-001, pg 2-260 200E P-241ER311-001, pg 2 260 (NOTE: The 11/8/99 Shortform Approval had no approval conditions.) 200E P-241ER151-001, pg 2-265 200E P-241ER152-001, pg 2-265 200E P-241ER153-001, pg 2-266 It is recommended that for all these emission points, the periodic confirmatory measurement be noted as: "Periodic confirmatory measurements are to be performed using the instruments and methods as defined in the sitewide ambient monitoring program".	3	Comment noted. Monitoring statements added.
252	2	260	5.0	300 diffuse/fugitive emissions, 300 Area Emissions: AIR 00-708 dated 7/27/00 with 26 conditions should also apply to this entry.	3	Health agrees and will make the requested changes.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
253	2	260	5.0	300 J-NONPOINT 026, It is believed WDOH approval to perform the isolation of Valve Box #11 outside the 324 Building has expired (18 month approval window closed on 1/7/01). Should this item be qualified or removed altogether from the draft AOP? It is intended to pursue a reinstatement of approval (short-form NOC revision) and perform the valve box isolation this next spring/summer.	3	No closure window is identified in the NOC revision approval. No reinstatement is necessary. The approval will remain active but under the 300 area diffuse and fugitive emissions.
254	2	266	5.0	Hexone Tanks, Emission Unit ID 482: This is a passive emission units that has a HEPA filter and relies on the near-facility monitoring network to monitor potential emissions. It is recommended that an abatement technology section is added to state that the controls for this unit is a single HEPA filter. In addition, it is recommended that a monitoring requirements section be added to state that the near-facility monitoring network provides monitoring of emissions.	3	Comment accepted. Moved EU to point source table 1.2 under AEI number P-276S141 001.
255	2	266	5.0	Hexone Tanks, Emission Unit ID 482: An ALARACT agreement was signed on 7/18/2000 which should be included in the WDOH Statement of Basis along with other ALARACT agreements.	3	Health agrees and will make the requested changes.
256	2	267	5.0	Purgewater Modutanks, Emission Unit ID 465, # 4: The last sentence in this paragraph is ambiguous. My understanding is that the quality assurance program must be compatible with national standards, in accordance with WAC 246-247-075(6). I suggest it read that way. This comment also applies to similar language used in other sections of this attachment, i.e., Page 2-268, paragraph 13.	3	Comment noted. Ambiguous text was edited for clarity.
257	2	269	5.0	AIR 98-1009, 10/29/98, NOC_ID 324: Condition # 22 (The annual possession quantity…") was not in this approval order and should be deleted.	3	Health agrees and will make the requested changes.
258	2	269	5.0	200 J-NONPOINT 003, Tank Farm Restoration and Safe Storage, AIR 00-310, Condition #8 for AIR 00-310 does not agree with the AIR 00-310 approval letter dated 3/22/00.	3	See comment response #103.
259	2	272	5.0	Telecon, 3/16/98, NOC_ID 265: This telecon should be deleted as it provides clarification for an approval (AIR 98-302) that is obsolete. Also, AIR 00-310, which is both active and written against this emission unit, states that it supercedes all previous NOCs (for this unit).	3	Excluded from AOP.
260	2	272	5.0	200 J-NONPOINT 003, Tank Farm Restoration and Safe Storage, The Telecon of 3/18/98 was a clarification and should be deleted from the draft AOP.	3	Excluded from AOP.
261	2	273	5.0	Delete the entire first paragraph. Instead, reference Attachment 2, Figure 1 "Acceptable Methods for Perdiodic Confirmatory Measurement Methods for Minor Stacks" to establish periodic confirmatory measurement methods for the minor passivley ventilated vents in high level waste tank farms.	1	The language identifying the monitoring requirements was negotiated with DOE-RL specifically for the high level waste tank listed in table 2.1.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
262	2	273	5.0	Delete the confirmation level of 10,000 dpm/100 cm2 beta gamma and 200 dpm/100 cm2 alpha. There is no technical nor regulatory basis for these values, and should be removed as not an AOP applicable requirement per WAC 173-401-200(4). Confirmatory measurements should be consistant with other minor point sources in Attachment 2, Figure 1.	2	See comment response to #261.
263	2	273	5.0	Because Tank C-103 is being vented in a passive mode similar to other SSTs, add Tank 241-C-3 to Table 2.1. (NOTE: The emission point, 296-C-07, has not operated for years.)	3	Comment noted. Obsolete EU corrected. 241-C-103 added to table 2.1
264	2	293	5.0	Emission point 300 EP-305B-01-V should be 300 EP-305B-01-S	3	Health agrees and will make the requested changes.
265	2	169	Table 1.2	200W CWC: Only conditions that specifically apply to CWC (#'s 1, 4, 6, 9, 15, 17, 22, & 25) should be listed. The remaining conditions that apply to all Hanford emission points should be removed from this NOC listing.	3	All of the conditions and limits are terms of the approval dated 8/24/98 and apply to the 200W CWC.
266	2	259	Table 1.3	200W P-Trench31 001 and 200W P-Trench34 001: Health issued a clarification stating that "Upon commencement of placing non-containerized radioactively contaminated waste in Trench 31 and/or Trench 34, a periodic confirmatory measurement (PCM) activity shall be implemented. This PCM activity shall consist of smearing the orifice(s) of the liquid overflow pipe(s) before and after emptying the tank(s). During those months when the tank(s) is/are not emptied, a smear shall be taken monthly. After the accumulation of one year's worth of smear data, the frequency of this PCM activity shall be reassessed based on the results of the smear data." The tie to non-containerized radioactive waste is important and needs to be captured in the license.	3	All of the information for PCM requirements listed by the commenter is found referenced in the AOP for both emission units under the RTAM approved 8/3/99.
267	2		5.0	General: The monitoring requirement section for each minor stack identifies WAC 246-247-050(5) as a requirement. There is no such section in the regulations. This must be a typo and should be corrected.	2	This has been corrected.
268	2		5.0	General: Several project approval conditions listed in Tables 1.1 and 1.2 are not requirements. Instead, many of the requirements are statements of fact or description. These should be removed and replaced with actual emission limitations and conditions, if applicable. Specific examples are included in this table.	3	A modification to the underlying applicable requirement is required to make any changes to the approved conditions.
269	2		5.0	General: Permit would be less confusing and more focused if NOC revisions dealing only with information in the application are not included. Specific examples are included in this table.	3	No table was attached to this comment. We have attempted to identify these and remove them.

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270	2		5.0	General: Many approval conditions contain cross-references to other approval conditions within the same approval or other approvals. The numbering system of each condition in the AOP does not match the original approval, so the numerical references in the AOP are not correct. Suggest a notation in section 5.0 that all approval conditions references refer to the underlying AIR letter. Specific examples are included in this table.	3	Comment noted. Note added to sect. 5.0.
271	2		5.0	296-B-2 Stack: Information concerning this stack and the active NOC conditions needs to be included in the WDOH License. It appears to have been overlooked.	3	Health agrees and will make the requested changes.
272	2		5.0	General: Several of the emission points list the following condition: "This approval with its Conditions and Limitation, constitutes an amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit…" This condition has already been meet by inclusion in this AOP does not need to be listed as an action that is yet to be completed.	3	We have attempted to identify these and remove them.
273	2		5.0	General: There appear to be incorrect citations listed under the abatement technology and monitoring requirements section for each emission unit. For example, WAC 246-247-050(5) and WAC 246-247-101 are cited. This must be a typo as there are no such sections in the WAC. Another example is the reference to WAC 246-247-040(5) in the description of abatement technology. This section of the WAC has to do with setting emission limits not abatement technology. The reviewer is wondering if the permit writer meant to cite WAC 246-247-040 (4). It is recommended that the citations in these tables be checked to ensure that they are correct. In addition, since there are now two versions of the ANSI N13.1 standard, references to this standard should be qualified with the 1969 date.	3	Comment noted. Citations corrected.
274	2		5.0	291-U-1 Stack: Information on this stack needs to be included in the WDOH License. It appears to have been overlooked.	3	Health agrees and will make the requested changes.

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275	2		5.0	Emission Units Specific Applicable Requirements Tables: Emission Points: **EP-3720-02-S** and **EP-3720-003-S** Formal notification of closure and deregistration of Emission Points EP-3720-02-S and EP-3720-03-S was provided to Health on September 25, 2000 (Letter, SH Wisness, DOE-RL, to AW Conklin, WDOH, dated September 25, 2000, titled "Notice of Closure and Deregistration of Emission Points EP-3720-02-S and EP-3720-03-S, 3720 Environmental Sciences Laboratory" letter # 00-OSS-517), however, Health has not yet issued a formal deregistration letter. Recommend that emission points are listed until such time as a formal deregistration letter has been received.	3	The Notice of Closure and Deregistration letter dated 9/25/2000 states; "there are no potential emission pathways for both EP-3720-02-S and EP 3720-03-S". The letter includes an attached photo of the capped emission points with further statements of assurance that the outlets have been capped, cover plates installed, fans have been shut down and there is no need for installation of active or passive ventilation system with emission control or monitoring devices. For the purposed of this permit, the closure requirements have been met. Ref: 246-247-080(6) WAC.
276	2		5.0	Table 1.1 General: Remove all NOC Revision approvals that concern only text revisions to the NOC application and do not contain new or modified approval conditions.	4	Comment noted. Where applicable, the response to comment noted the approval was "Excluded from the AOP".
277	2		5.0	Add a second note stating that "Record sampling is not required when the emission unit is not operating." This footnote from a previous version was not included in this version.	4	See response to comment # 85.
278	2		5.0	General Comment: As a matter of consistency and fairness in the Periodic Confirmatory Measurement requirements for Record Sampling to those DOE contractors managing minor stacks for DOE, the sampling frequency should be consistent. Some minor stacks (without knowing the basis for why) are set at "2 week sample/year" and others are set at "4 week sample/year". It is requested that any Record Sample requirement in Table 1.2 under the Monitoring Requirements section with a sampling frequency of "4 week sample/year" be changed to reflect the "2 week sample/year" unless a specific frequency is identified in the NOC approval order.	4	The sampling information was provided to Health by the facilities and discussed in AOP negotiation sessions with DOE-RL.
279	2			200W J-NONPOINT 025: AIR 00-1104, dated 11/17/00, should be added to the license. This approval letter modified condition #22 of AIR 00-515 and made conditions of AIR 99-701 applicable.	5	Health agrees and will make the requested changes.
280	4	14	Appendix A	The schedule in Appendix A is no longer current. A suggestion is to include the schedule from the latest NESHAP quarterly report in the Statement of Basis with a statement in Section 4.10 that the latest schedule is included in the Statement of Basis.	2	Comment noted. Suggested changes or similar changes were made.
281	4	20	Appendix B	It's recognized that the FFCA (#00-05-006) between EPA Region 10 and DOE was signed in 1994, however, it's noted that the list of registered stacks in Appendix B of the FFCA is not current as of issuance of the draft AOP and may lead to confusion. Recommend that a footnote be added to Appendix B of the FFCA explaining the discrepancy or preferably update Appendix B.	1	See comment response above.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
282	All	All	All	General Editorial: Several Typographical and/or spelling errors were discovered throughout the permit and should be corrected. Suggest running a spellcheck program.	1	A final editorial review will be made.
283	All	All	All	General Editorial: Recommend that the draft Permit and Statement of Basis be submitted to a technical editor for review prior to issuance, in order to correct numerous editorial inconsistencies.	1	Comment noted. See previous comment.
284	SOB	14		Insignificant emission units and activities: The section as currently written ties the IEU list to the application, which the applicant is not required to keep current following issuance of the draft permit. Therefore, this section will become increasingly inaccurate during the five year permit term. We suggest replacing the text with the following information. WAC 173-401-530 establishes several criteria for determining if an emission unit is insignificant (IEU). The Hanford Site Air Operating Permit Application (DOE/RL-97-07) contains lists of IEUs. WAC 173-401 also defines how those lists should be maintained during the application phase and following permit issuance. The applicant is required to amend its application if an IEU based on actual emissions will subsequently exceed an actual emission threshold and the unit must then be listed in the permit. This requirement extends until the draft permit is issued. The air operating permit regulations do not require that each IEU be listed in the permit. Following permit issuance, no emission unit that qualifies as an IEU based on actual emissions can exceed the emission thresholds in WAC 173-401 without first obtaining a permit modification.	5	Ecology agrees and will make the requested changes.
285	SOB	14	7.0	The 222-S Hot Cell Addition is not included in this table? The NOC contained a one time only testing requirement for VOCs prior to startup, the test was completed. This condition should be listed in the table.	5	Ecology agrees and will make the requested changes.
286	SOB	17	7.0	Obsolete conditions table: 300 EP-3020-01-S, 2nd row: Remove this row ("Obsolete NOC Revision").	5	Ecology agrees and will make the requested changes.
287	SOB	17-18	7.0	Obsolete conditions table: Change the obsolete conditions for the EMSL emission points to match language in the original approval order.	5	Ecology agrees and will make the requested changes.
288	SOB	19	10.0	Edit the second sentence to read "Several entities identified in Section 11 below operate…"	5	Ecology agrees and will make the requested changes.
289	SOB	19	10.0	The entry for the Life Sciences Laboratory I (Building 331) should be deleted. None of the original NOC conditions are obsolete.	5	Ecology agrees and will make the requested changes.

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290	SOB	19-20	10.0	The permit application lists the "owner" as U.S. Department of Energy Richland Operations Office. Therefore the first sentence of this section should read: "When a facility or entity is located on the Hanford Site, the presumption is that the facility or entity is under the U.S. DOE Richland Operations Office's (DOE-RL) control. And in the subsequent text, "DOE" should be replaced with "DOE-RL".	5	The owner is U.S. Department of Energy as corrected in the Standard Terms and Conditions.
291	SOB			General: Four sections were left out of the Ecology Statement of Basis: 1) the section outlining the tiered approach for opacity monitoring, 2) the section dealing with Waste Sampling and Characterization Facility, 3) the section describing CAR Subpart AA Enforcement at 200 Area Liquids, and 4) the definition of process knowledge. Add these four sections.	5	Ecology agrees and will add these sections.
292	SOB	1		It appears as if all the ALARACTs are listed twice. It also appears that some ALARACTs have been mixed and combined.	5	This is one of the database programming problem. This issue has been resolved.
293	SOB	45		(1706KE Lab) 1) The "Stack Height" is 35 ft rather than 7.6 ft. 2) The "Average Stack Effluent Temperature" is 78 degrees Fahrenheit rather than 77 degrees Fahrenheit. 3) An "Exhaust Velocity" of 113 ft/second is 34.4 m/second rather than 113.0 m/second as reported. 4) The "Average Volumetric Flow Rate" is 12,000 cfm rather than 200 cfm. 5) The emission unit should be 100KR-1706KE 001 rather than 100KR-1706KE-001.	5	1. Changed stack height to 35 ft. 2. Changed temperature to 78 degrees Fahrenheit. 3. Conversion error has been corrected. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity. 5. Emission unit name changed.
294	SOB	47		Exhaust velocity should be 31.8 ft/sec or 8.3 m/sec, avg vol flow rate should be 1500 cfm or 31.2 m3.	5	1. 31.8 ft/sec is 9.6 m/sec. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
295	SOB	48		Exhaust velocity should be 29.6 ft/sec or 7.7 m/sec, avg vol flow rate should be 75,000 cfm or 35.4 m3.	5	1. 29.6 ft/sec is 9.02 m/sec. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
296	SOB	49		The process description should read: Liquid waste generated by the 222-S Laboratory Complex is disposed of into sinks which drain into collection tanks located in the 219-S vault. The waste is transferred into a process tank where it is treated and subsequently transferred and disposed of at Tank Farms.	5	The process description was changed as requested.
297	SOB	49		The controls should read: The exhaustfrom each of the three tanks located in the 219-S vault joins a common plenum and passes through a 23 in fiberglass moisture de-entrainer and a single stage HEPA and fan prior to exiting the stack.	5	Controls field was changed as requested.
298	SOB	49		(296-S-21) 1) The "Exhaust Velocity" should be 32.5 ft/second which is 9.9 m/second. 2) The "Average Volumetric Flow Rate" is 176 cfm rather than 2.83 cfm.	5	Irresolvable. Page reference and emission unit reference do not match.
299	SOB	50		296-P-41:This unit should be removed because its permit is obsolete	5	This unit was has status as inactive per comment. The support documentation can stay within the SOB.

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300	SOB	50		A106:The description mentions that this facility has 6 tanks. Why then is a single tank number given to this facility - A106 is one of the six tanks.	5	The listing is not in order. The other tanks are on subsequent pages.
301	SOB	54		296-A-26: The description mentions that this exhauster is for 241-AN Farm. This is incorrect as this exhauster vents the 204AR Facility. In either case the rest of the information given does not match the AOP Application information supplied.	5	Information changed to match the supplied AOP application information.
302	SOB	79		296-P-44: This emission unit does not match building description for 241-SY Tank Farm. This is a Salt Well Exhauster to be used duing Salt Well pumping in any of the Notice of Construction listed Tanks, which include more than 241-A-101 and 241-U-102.	5	Building description give a general function of the facility not necessarily the emission unit. Tank reference was removed from the process description.
303	SOB	83		(296-A-22) 1) The "Stack Diameter" is 0.62 ft rather than 0.7 ft. 2) The "Average Stack Effluent Temperature" is 120 degrees Fahrenheit rather than 117 degrees Fahrenheit. 3) The "Exhaust Velocity" should be 23.8 ft/second which is 7.25 m/second. 4) The "Average Volumetric Flow Rate" is 428.4 cfm rather than 10.6 cfm.	5	1. Stack diameter was changed to 0.62 ft. 2. Stack Effluent temperature was changed to 120 degrees Fahrenheit. 3. Stacks exhaust velocity 23.8 ft/sec. 4. The “Average Volumetric Flow Rate” field has been removed. This was a calculated field using stack diameter and velocity.
304	SOB	84		(296-A-21) 1) The "Average Stack Effluent Temperature" is 117 degrees Fahrenheit rather than 78 degrees Fahrenheit. 2) The "Exhaust Velocity" should be 37.8 ft/second which is 11.5 m/second. 3) The "Average Volumetric Flow Rate" is 21,818 cfm rather than 318 cfm.	5	1. Stack Effluent temperature was changed to 117 degrees Fahrenheit. 2. Stacks exhaust velocity 37.8 ft/sec. 3. The “Average Volumetric Flow Rate” field has been removed. This was a calculated field using stack diameter and velocity.
305	SOB	92		296-U-11: This unit should be removed as it is not permitted for operation.	5	This unit will remain in the permit with a Non-operational status.
306	SOB	93		305B BUILDING: 1) Change the name at the top of the page to 305 B Hazardous Waste Storage Building. 2) The AEI emission point name should be 300 EP-305B-01-S rather than 300 EP-305B-01-V (change "V" to "S"). 3) The "Exhaust Velocity" should be 9.6 m/second rather than 31.8 m/second. 4) The "Average Volumetric Flow Rate" should be 1025 cfm 0.48 cubic meters/sec.	5	1. No change, the name matches the name supplied in the AOP application. 2. Emissions point name changed from “V” to “S”. 3. Conversion error has been corrected. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
307	SOB	94		306-W MATLS DEV LAB: 1) The "Emission Unit Location" is: 46° 22' 17" N, 119° 16' 42" W. 2) The "Stack Height" is 24.6 ft. 7.49 m. 3) The "Exhaust Velocity" should be 44 ft/second 13.5 m/second. 4) The "Average Volumetric Flow Rate" should be 26,780 cfm 12.6 cubic meters/sec.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
308	SOB	95		(309-PRTR) 1) The "Exhaust Velocity" should be 5.94 ft/second which is 1.81 m/second. 2) The "Average Volumetric Flow Rate" is 6,996 cfm rather than 117 cfm. 3) The "Controls:" should list 1 fan and one HEPA.	5	1. Conversion error has been corrected. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity. 3. Controls field was changed as requested.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
309	SOB	96		318 RADIOLOGICAL SCIENCES: 1) Change the name at the top of the page to 318 RADIOLOGICAL CALIBRATIONS LABORATORY. 2) The "Emission Unit Location" is: 119° 16' 50" W, rather than 119° 16' 40" W. 3) The "Stack Height" is 28.9 ft. 8.80 m. 4) The "Stack Diameter" should be 0.8 ft 0.25 m. 5) The "Exhaust Velocity" should be 15.1 ft/second 4.6 m/second. 6) The "Average Volumetric Flow Rate" should be 490 cfm 0.23 cubic meters/sec. 7) The "Controls:" should read "There are currently no controls on the 318 exhaust system."	5	1. Information changed to match the supplied AOP application information. 2. Change made as requested. 3. Change made as requested. 4. Change made as requested. 5. Change made as requested. 6. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity. 7. Controls field was changed as requested.
310	SOB	97		320 PHYSICAL SCIENCE LAB: 1) Change the name at the top of the page to 320 ANALYTICAL AND NUCLEAR RESEARCH LABORATORY. 2) The "Exhaust Velocity" should be 31 ft/second 9.5 m/second. 3) The "Average Volumetric Flow Rate" should be 492 cfm.	5	1. Information changed to match the supplied AOP application information. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
311	SOB	98		EP-320-03-S: 1) The "Emission Unit Location" is: 119° 16' 50" W 2) The "Exhaust Velocity" should be 8.96 m/second. 3) The "Average Volumetric Flow Rate" should be 466 cfm.	5	1. Change made as requested. 2. Conversion error has been corrected. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
312	SOB	98		EP-320-01-S: 1) The "Emission Unit Location" is: 119° 16' 50" W. 2) The "Exhaust Velocity" should be 26.2 ft/second 8.0 m/second. 3) The "Average Volumetric Flow Rate" should be 30,900 cfm 14.5 cubic meters/sec.	5	1. Change made as requested. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
313	SOB	99		EP-320-02-S: 1) The "Emission Unit Location" is: 119° 16' 50" W. 2) The "Exhaust Velocity" should be 4.7 m/second. 3) The "Average Volumetric Flow Rate" should be 505 cfm 0.23 cubic meters/sec.	5	1. Change made as requested. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
314	SOB	100		EP-323-01-S: 1) The "Exhaust Velocity" should be 37 ft/second 11.3 m/second. 2) The "Average Volumetric Flow Rate" should be 4,880 cfm 2.3 cubic meters/sec.	5	1. Change made as requested. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
315	SOB	101		(EP-324-01-S) 1) The "Exhaust Velocity" should be 24.5 ft/second which is 7.5 m/second. 2) The "Average Volumetric Flow Rate" is 74,073 cfm rather than 1160 cfm.	5	1. Change made as requested. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
316	SOB	102		325 APPLIED CHEMICAL LAB: 1) Change the name at the top of the page to 325 RADIOCHEMICAL PROCESSING LABORATORY. 2) The "Emission Unit Location" is: 46° 22' 7.6" N. 3) The "Exhaust Velocity" should be 46 ft/second 14.0 m/second. 4) The "Average Volumetric Flow Rate" should be 138,650 cfm 65.2 cubic meters/sec. 7) The "Controls:" text last sentence : there is an extra space before "a fan".	5	(1) Information changed to match the supplied AOP application information. (2) Change made as requested. (3) Change made as requested. (4) The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity. (5) Change made as requested.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
317	SOB	103		326 MATERIAL SCIENCE LAB: 1) Change the name at the top of the page to 326 MATERIAL SCIENCES LAB. 2) The "Emission Unit Location" is: 46° 22' 9" N and 119° 16' 45" W. 3) The "Exhaust Velocity" should be 30 ft/second 9.2 m/second. 4) The "Average Volumetric Flow Rate" should be 51,000 cfm 24.0 cubic meters/sec. 7) The "Controls:" text 2nd sentence : "sing" should be "single".	5	(1) Information changed to match the supplied AOP application information. (2) Change made as requested. (3) Change made as requested. (4) The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity. (5) Change made as requested.
318	SOB	106		329 BUILDING: 1) Change the name at the top of the page to 329 CHEMICAL SCIENCES LABORATORY. 2) The "Exhaust Velocity" should be 43 ft/second 13.0 m/second. 3) The "Average Volumetric Flow Rate" should be 50,100 cfm 23.5 cubic meters/sec.	5	1. Information changed to match the supplied AOP application information. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
319	SOB	107		331 LIFE SCI LAB: 1) Change the name at the top of the page to 331 LIFE SCI LAB I. 2) The "Emission Unit Location" is: 46° 21' 54" N, 119° 16' 17" W. 3) The "Exhaust Velocity" should be 35 ft/second 10.62 m/second. 4) The "Average Volumetric Flow Rate" should be 69,400 cfm 32.6 cubic meters/sec.	5	1. Information changed to match the supplied AOP application information. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
320	SOB	108		331G building: 1) Change the name at the top of the page to 331 Building. 2) The "Emission Unit Location" is: 46° 21' 47" N, 119° 16' 14" W. 3) The "Stack Height" is 15 ft. 4.6 m. 4) The "Stack Diameter" should be 0.8 ft 0.25 m. 5) The "Exhaust Velocity" should be 41.8 ft/second 12.73 m/second. 6) The "Average Volumetric Flow Rate" should be 1356 cfm 0.64 cubic meters/sec.	5	1. Information changed to match the supplied AOP application information. 2. Change made as requested. 3. Change made as requested. 4. Change made as requested. 5. Change made as requested. 6. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
321	SOB	109		EP-331G-01-S: 1) The "Emission Unit Location" is: 46° 21' 47" N, 119° 16' 14" W. 2) The "Stack Height" is 19.1 ft. 5.8 m. 3) The "Stack Diameter" should be 0.9 ft 0.28 m. 4) The "Exhaust Velocity" should be 14.3 ft/second 4.4 m/second. 5) The "Average Volumetric Flow Rate" should be 563 cfm 0.26 cubic meters/sec.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. Change made as requested. 5. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
322	SOB	110		(340-NT-EX) 1) The "Exhaust Velocity" should be 16.6 ft/second which is 5.1 m/second. 2) The "Average Volumetric Flow Rate" is 2,001 cfm rather than 33.4 cfm.	5	1. Conversion error has been corrected. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
323	SOB	111		(340DECON) 1) The "Stack Height" is 27 ft rather than 9.8 ft. 2) The "Exhaust Velocity" should be 25.5 ft/second which is 7.8 m/second. 3) The "Average Volumetric Flow Rate" is 7,512 cfm rather than 125 cfm.	5	1. Change made as requested. 2. Conversion error has been corrected. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
324	SOB	111		(340B-BLDG) 1) The "Exhaust Velocity" should be 16.5 ft/second which is 5.0 m/second. 2) The "Average Volumetric Flow Rate" is 1,752 cfm rather than 29.2 cfm.	5	1. Conversion error has been corrected. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
325	SOB	112		3720 BUILDING: 1) Change the name at the top of the page to 3720 ENVIRONMENTAL SCIENCES LABORATORY. 2) The "Exhaust Velocity" should be 25.1 ft/second 7.6 m/second. 3) The "Average Volumetric Flow Rate" should be 18,900 cfm 8.9 cubic meters/sec.	5	1. Information changed to match the supplied AOP application information. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
326	SOB	113		3730 GAMMA IRRAD FAC: 1) The "Emission Unit Location" is: 46° 22' 11" N, 119° 16' 48" W. 2) The "Exhaust Velocity" should be 5.12 m/second. 3) The "Average Volumetric Flow Rate" should be 355 cfm 0.17 cubic meters/sec.	5	1. Change made as requested. 2. Conversion error has been corrected. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
327	SOB	114		(437-MN&ST) 1) The "Stack Height" is 30 ft rather than 2.7 ft. 2) The "Stack Diameter" is 9 ft x 6 ft rather than 8 ft (its a rectangular rather than a circular stack). 3) The "Exhaust Velocity" should be 4.9 ft/second which is 1.5 m/second. 4) The "Average Volumetric Flow Rate" is 15,876 cfm rather than 246 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Conversion error has been corrected. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
328	SOB	115		(437-1-61) 1) The "Stack Height" is 37 ft rather than 4 ft. 2) The "Stack Diameter" is 0.33 ft x 4 ft rather than 6 ft (its a rectangular rather than a circular stack). 3) The "Exhaust Velocity" should be 18.75 ft/second which is 5.7 m/second. 4) The "Average Volumetric Flow Rate" is 1,485 cfm rather than 530 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Conversion error has been corrected. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
329	SOB	119		(296-E-1) 1) The "Exhaust Velocity" should be 31 ft/second (9.45 m/second) rather than 7,000 ft/second (NOTE 7,000ft/sec is over Mach 6!). 2) The "Average Volumetric Flow Rate" is 52,000 cfm rather than 2E+06 cfm.	5	1. Change made as requested. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
330	SOB	121		(FFTF-HT-TR) 1) The "Stack Height" is 20 ft rather than 2.0 ft. 2) The "Stack Diameter" is 2 ft x 2 ft rather than 3.9 ft (its a rectangular rather than a circular stack). 3) The "Exhaust Velocity" should be 17.4 ft/second (5.3 m/second). 4) The "Average Volumetric Flow Rate" is 4,176 cfm rather than 208 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
331	SOB	123		(FFTF-CB-EX) 1) The "Stack Height" is 40.5 ft rather than 4.5 ft. 2) The "Stack Diameter" is 4.5 ft x 4.5 ft rather than 3.6 ft (its a rectangular rather than a circular stack). 3) The "Exhaust Velocity" should be 19.8 ft/second (6.0 m/second). 4) The "Average Volumetric Flow Rate" is 24,057 cfm rather than 202 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Conversion error has been corrected. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
332	SOB	124		(FFTF-RE-SB) 1) The "Stack Height" is 18 ft rather than 19 ft. 2) The "Stack Diameter" is 4 ft x 4 ft rather than 3.0 ft (its a rectangular rather than a circular stack). 3) The "Exhaust Velocity" should be 13.1 ft/second (4.0 m/second). 4) The "Average Volumetric Flow Rate" is 12,576 cfm rather than 95.4 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
333	SOB	128		(296-Z-15) 1) An "Exhaust Velocity" of 34 ft/second is 10.4 m/second rather than 34.0 m/second as reported. 2) The "Average Volumetric Flow Rate" is 1,612 cfm rather than 26.7 cfm.	5	1. Change made as requested. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
334	SOB	128		(296-Z-6) 1) The "Stack Diameter" is 3 ft x 1.83 ft rather than 2.5 ft (its a rectangular rather than a circular stack). 2) The "Exhaust Velocity" should be 36.4 ft/second (11.1 m/second). 3) The "Average Volumetric Flow Rate" is 11,990 cfm rather than 179 cfm.	5	1. Change made as requested. 2. Conversion error has been corrected. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
335	SOB	129		(291-Z-1) 1) The "Exhaust Velocity" should be 33.8 ft/second (10.3 m/second). 2) The "Average Volumetric Flow Rate" is 290,288 cfm rather than 4840 cfm.	5	1. Conversion error has been corrected. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
336	SOB	130		(296-Z-3) 1) The "Average Stack Effluent Temperature" is 120 degrees Fahrenheit rather than 49 degrees Fahrenheit. 2) The "Exhaust Velocity" should be 44.2 ft/second (13.5 m/second). 3) The "Average Volumetric Flow Rate" is 2,997 cfm rather than 15.3 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
337	SOB	130		(296-Z-5) 1) The "Stack Diameter" is 2.8 ft rather than 2.0 ft. 2) The "Exhaust Velocity" should be 36.5 ft/second (11.1 m/second). 3) The "Average Volumetric Flow Rate" is 13,490 cfm rather than 115 cfm.	5	1. Change made as requested. 2. Conversion error has been corrected. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
338	SOB	131		(296-Z-14) 1) The "Exhaust Velocity" should be 33.3 ft/second (10.2 m/second). 2) The "Average Volumetric Flow Rate" is 1,578 cfm rather than 21.4 cfm.	5	1. Change made as requested. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
339	SOB	131		This emission unit is shut down and there are no plans to restart the stack. This emission unit should be removed from the AOP since there is no valid information included for this emission unit. If required to list in AOP, the facility/plant name is 231-Z and not PFP.	5	Comment noted. PFP is used simply as a generic location descriptor.
340	SOB	132		(296-Z-7) 1) An "Exhaust Velocity" of 1800 ft/second equals 549 m/second rather than ,800 m/second as reported.	5	Conversion error has been corrected.
341	SOB	134		Emission Unit RCF-2-EX: Information on this emission unit needs to be included. Information will be provided to WDOH.	5	Comment accepted.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
342	SOB	137		Emission Unit 296-S-2: Delete the information for this emission unit as it is closed.	5	Change made as requested.
343	SOB	138		(296-T-11) 1) The "Stack Height" is 43 ft rather than 42 ft. 2) The "Stack Diameter" is 2.67 ft rather than 3.0 ft. 3) The "Average Stack Effluent Temperature" is 78 degrees Fahrenheit rather than 80 degrees Fahrenheit. 4) The "Exhaust Velocity" should be 43.5 ft/second (13.3 m/second). 5) The "Average Volumetric Flow Rate" is 14,633 cfm rather than 308 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. Conversion error has been corrected. 5. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
344	SOB	138		Please revise the following sentence as indicated: The 296-T-11 and 296-T-12 stacks passively ventilate~~s~~ other areas of TRUSAF when the fans are not operational.	5	Change made as requested.
345	SOB	139		(296-T-12) 1) The "Exhaust Velocity" should be 30.8 ft/second (9.4 m/second). 2) The "Average Volumetric Flow Rate" is 10,349 cfm rather than 172 cfm.	5	1. Conversion error has been corrected. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
346	SOB	140		The correct information is: 1) Stack Height: 25.8 ft. 7.62m. 2) Stack Diameter: 2.3 ft. 0.71 m. 3) Temperature: 90 degrees fahrenheit 32.2 degrees Celsius 4) Exhaust Velocity: 81.9 ft/s 24.9 m/s 5) Flow Rate: 21,000 cubic feet/m 9.9 cubic meters/s	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
347	SOB	141		(291-T-1) 1) The "Exhaust Velocity" should be 30.6 ft/second (9.3 m/second). 2) The "Average Volumetric Flow Rate" is 601 cfs.	5	1. Conversion error has been corrected. 2. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
348	SOB	144		(296-W-4) 1) The "Stack Height" is 46.3 ft rather than 46 ft. 2) The "Exhaust Velocity" should be 49 ft/second (14.9 m/second). 3) The "Average Volumetric Flow Rate" is 16,464 cfm rather than 1980 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
349	SOB	145		The avg vol flow should be 2000 cfm.	5	The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
350	SOB	145		(696-W-2) 1) The "Stack Height" is 33.2 ft rather than 44 ft. 2) The "Stack Diameter" is 1 ft x 3 ft rather than 2.1 ft (its a rectangular rather than a circular stack). 3) The "Average Stack Effluent Temperature" is 90 degrees Fahrenheit rather than 70 degrees Fahrenheit. 4) The "Exhaust Velocity" should be 33.3 ft/second (10.2 m/second). 5) The "Average Volumetric Flow Rate" is 5,999 cfm rather than 33.3 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
351	SOB	146		The avg vol flow 54,000 cfm and 25.5 m3/sec.	5	The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
352	SOB	146		(696-W-1) 1) The "Stack Height" is 25 ft rather than 42.5 ft. 2) The "Stack Diameter" is 4 ft rather than 4.5 ft. 3) The "Average Stack Effluent Temperature" is 78 degrees Fahrenheit rather than 70 degrees Fahrenheit. 4) The "Exhaust Velocity" should be 66 ft/second (20 m/second). 5) The "Average Volumetric Flow Rate" is 49,777 cfm rather than 907 cfm.	5	1. Change made as requested. 2. Change made as requested. 3. Change made as requested. 4. The "Average Volumetric Flow Rate" field has been removed. This was a calculated field using stack diameter and velocity.
353	SOB	261		Four additional emission units identified in AIR 00-802 need to be added to the license. AIR 00-802 identifies conditions for several non-point sources of emissions. These non-point sources are 600 J NONPOINT 033, J NONPOINT 023, 600 J NONPOINT 031, and 600 J NONPOINT 033. However, none of these four emission units appear in the license.	5	Non-point reference 023 was a typo. It has been change to read 032. The underlying AIR letter was structured listing a condition to each of the named emission units. It is evident which requirement is associated with each stack.
354	SOB	117		The last two sentences under "Building Description:" are incorrect and should be deleted. CWC does not store drums in several trenches.	5	Change made as requested.
355	SOB	138		The first two sentences under "Building Description:" are incorrect and should be deleted. CWC and TRUSAF are different facilities.	5	Change made as requested.
356	SOB	46 through 142		All the information does not match what is provided in the AOP Application. Also, there are apparent math errors present (e.g. 18 ft/sec does not equate to 18.2 m/sec). There appears to be an equation error in the spreadsheet used to generate this information. This comment applies to the following stacks, 296-P-31, 296-A-42, 296-A-30, 296-A-29, 296-A-40, 296-A-41, 296-A-27, 296-A-28, 296-A-19, 296-A-18, 296-A-43, 296-A-20, 296-P-16, 296-S-15, 296-P-44, 296-S-25, 296-P-28, 296-P-22, 296-P-23, 296-T-17, 296-A-25, 296-S-22, 296-A-13, 296-B-28, 296-C-05, 296-T-18, 296-P-32, 296-P-33, 296-P-34, 296-W-03.	5	Conversion error has been corrected.
357	SOB			General: Much of the stack height and diameter, exit velocity, and volumetric flow rate information is incorrect. This data should be compared to information supplied in the Hanford Site Air Operating Permit Application and/or the Radionuclide Air Emission Report for more accurate information. Specific examples are included throughout this table.	5	Comment noted. Information has been corrected as supplied. In other cases programming errors have been corrected.
358	SOB			General: Editorial - throughout the Technical Support Document the word Fahrenheit is spelled incorrectly.	5	Change made as requested.
359	SOB			General: Replace the "Controls:" text with the actual number(s) and type(s) of control equipment contained in the Attachment 2 tables, and reference the diagrams in the AOP application. The text often leads to confusion if not read while looking at the flow diagrams.	5	Information has been corrected as supplied.
360	SOB			Emission Unit 291-U-1, 296-B-1, and 296-B-2: Emission unit information on these stacks needs to be included. Information on these units will be provided to WDOH.	5	Changes made from information provide from BHI.

Number	Attachment	Page	Section	Comment	Cat.	Agency Response
361	SOB			General: Certain information given in the statement of Basis is incorrect. The Hanford Site AOP Application should be consulted for stack information. Examples are included in this table.	5	Comment noted. Table referenced in comment was not attached. Where corrected information was provided, changes were made accordingly.
362	SOB			296-Z-15: This stack doesn't appear in the Technical Support Document, but should.	5	Health agrees and will make the requested changes.
363	SOB			Emission unit information is not currently discussed for EP-331-02-S and EP-3020-01-S. Recommend that emission unit specific information be added to Heath Statement of Basis.	5	Health agrees and will make the requested changes.
364	SOB			Emission unit information is not currently discussed for EP-3720-02-S and EP-3720-03-S. Formal notification of closure and deregistration of Emission Points EP-3720-02-S and EP-3720-03-S was provided to Health on September 25, 2000 (Letter, SH Wisness, DOE-RL, to AW Conklin, WDOH, dated September 25, 2000, titled "Notice of Closure and Deregistration of Emission Points EP-3720-02-S and EP-3720-03-S, 3720 Environmental Sciences Laboratory" letter # 00-OSS-517), however, Health has not yet issued a formal deregistration letter. Recommend that emission points be listed until such time as a formal deregistration letter has been received.	5	Health agrees and will make the requested changes.