

United States Department of Energy - Hanford Field Office (Bryan Trimberger)

On behalf of the United States Department of Energy - Hanford Field Office, please see attached comments.

Thank you.

DRAFT Renewal 4 Hanford Site Air Operating Permit (AOP) Number 00-05-006
PUBLIC COMMENT PERIOD: July 28 through September 19, 2025

Number	Comment	Basis	Recommendation
1	ATTACHMENT 1: Ecology Permits and Regulations Page 58 (PDF Page 60) 1.4.23 DP: Waste Treatment and Immobilization Plant - High Level Waste, Low-Activity Waste, Analytical Laboratory, and Balance of Facilities (11) Condition Approval	Editorial	Change Dangerous Waste Permit Condition Number <u>II</u> , 10.K.1.h (HLW) to <u>III</u> , 10.K.1.h (HLW).
2	ATTACHMENT 2: Department of Health License Emission Unit 486 and Emission Unit 1128 Monitoring and Testing Requirements These are a diffuse and fugitive emission units and Method 114 is a point source requirement and does not apply.	40 CFR 61, Appendix B, Method 114	Near & Far-Field monitoring for these units are more appropriate for Monitoring and Testing Requirements. Remove Method 114 and replace with <u>Near & Far-Field monitoring</u> .
3	ATTACHMENT 1: Ecology Permits and Regulations 2.0 COMPLIANCE AND PERIODIC MONITORING PROVISIONS Add oil analysis to Section 2.0 COMPLIANCE AND PERIODIC MONITORING PROVISIONS to add flexibility to Licensee's maintenance programs.	40 CFR 63.6625(i)&(j)	Add the following language to Section 2.0: " <u>Change oil and filter as recommended by the Owners Manual by the hours of operation or annually, whichever comes first, unless oil analysis program meeting 40 CFR 63.6625(i) or (j) determines replacement is not yet needed.</u> "
4	ATTACHMENT 1: Ecology Permits and Regulations 1.4.49 DP: 400 Area Emergency Compression Ignition Engine (1)Condition Approval Follow the stricter requirements of the following: (A) Operate and maintain the engine in accordance with Manufacturer's recommendations or instructions. (B) Change oil and filter every 500 hours of operation or annually, whichever comes first, unless oil analysis program meeting 40 CFR 63.6625(i) determines replacement is not yet needed. (C) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. (D) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (E) Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. Oil changes are required unless analysis is performed. It is not necessarily the most restrictive. This condition is also found in the following Discharge Points: 1.4.18, 1.4.23, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62, 1.4.73, 1.4.92, 1.4.93, 1.4.119. Any changes made to this language should be applied throughout. In addition, (1)(E) is redundant and should be removed. It is addressed in Section 2.0 and it does not align with the maintenance activities like A-D.	40CFR63.6625(i)	Revise the following language: Condition 1: <u>Operate and maintain the engine in accordance with Manufacturer's recommendations or instructions OR follow the requirements below:</u> (A) Change oil and filter every 500 hours of operation or annually, whichever comes first, unless oil analysis program meeting 40 CFR 63.6625(i) determines replacement is not yet needed, (B) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, (C) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
5	ATTACHMENT 1: Ecology Permits and Regulations 1.4.118 DP: 225BC-PTS800 Air Compressor Compression Ignition Engine The conditions need to match the conditions provided in Final NOC Approval Order Number DE25NWP-001 issued 9/2/25. There are discrepancies between what is listed in draft AOP Renewal 4 and the content of the NOC approval order.	Consistency with approval orders	Remove AOP Renewal 4 DP 1.4.118 Condition (1) for WESF air Pallet Diesel Engine and replace with DE24NWP-001 conditions.
6	ATTACHMENT 2: Department of Health License IDF EU: 1464, Condition 10 TREATMENT/VOID FILLING USING CONTAINERS WITH BUILT-IN RISERS When ported containers are used for grouting operations (i.e., during waste treatment or waste container void filling activities) on the IDF site a NucFil/HEPA filter shall be used to clean displaced air. The NucFil/HEPA filter shall comply with the efficiency requirements stated within Condition 5. (WAC 246-247-040(5) and WAC 246-247-060(5)) Condition 10 incorrectly identifies Condition 5 for the HEPA filter efficiency requirements. Condition 5 is titled "TRACK - Annual Inventory Tracking and Emissions Calculation", but Condition 4 states "If a waste container vent is required, it shall contain a filter with a minimum efficiency of 99.97% when tested with 0.3 micron particles upon installation."	Consistency with approval orders	Change last sentence in Condition 10 to read: The NucFil/HEPA filter shall comply with the efficiency requirements stated within Condition <u>4</u> .

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7	<p>ATTACHMENT 2: Department of Health License IDF EU: 1464, Condition 2 A summary of IDF tasks is provided below:</p> <ul style="list-style-type: none"> •Transportation of waste containers/packages between the waste treatment pad, waste storage pad, and into the disposal cells •Operation of the leachate collection system, including pumping collected water into tanker trucks for transportation, treatment, and disposal off of the IDF site •Soil backfill, grading, loading, unloading, transporting, and compacting within the IDF disposal cells •Waste treatment on the waste treatment pad •Waste storage on the waste storage pad <p>Storage of containerized waste prior to treatment or disposal will also be located on the waste treatment pad.</p>	IDF's RCRA permit allows for storage of waste on Dangerous Waste Management Units other than the "waste storage pad".	<p>5th bullet should be changed to read:</p> <ul style="list-style-type: none"> •Waste storage on the waste storage pad and waste treatment pad.
8	<p>ATTACHMENT 1: Ecology Permits and Regulations 2.1 Visible Emission Surveys and Visual Opacity Quantification "2.1 Visible Emissions Surveys and Visual Opacity Quantification: Visible emission surveys must be performed in accordance with EPA Method 22. To determine that corrective action or opacity quantification is not required, visible emission surveys must be conducted during daylight hours when the emission unit is operating and must cover at least 18 consecutive minutes. If emission units are only operated at night, or daylight operation is not representative of the worst-case scenario for opacity, a survey may be conducted at night with sufficient illumination."</p> <p>There is no regulation requiring 18 consecutive minutes under 40 CFR 63 Subpart IIII, JJJJ and ZZZZ requirements. Most of the engines are emergency engines and are well maintained with no visible emissions.</p> <p>WAC 173-400-040(2) Visible emissions. No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds 20 percent opacity as determined by ecology method 9A.</p>	There is no basis for visible emission observations of engines regulations in 40 CFR 63 or 40 CFR 60. WAC 173-400-040(2) 3-minutes	Delete "must cover at 18 consecutive minutes" and change text to "observe visible emissions for not greater than 6-minute observation."
9	<p>ATTACHMENT 2: Department of Health License EU 909 Condition 2, last 2 paragraphs CH2M HILL Plateau Remediation Company (CHPRC)... Radiological Control Manual, CHPRC Radiological Control procedures,....</p> <p>Remove CHPRC and update with Central Plateau Cleanup Company (CPCCo)</p>	Update to the current Hanford contractor	Update to the current Hanford contractor Central Plateau Cleanup Company (CPCCo)
10	<p>STANDARD TERMS AND GENERAL CONDITIONS 5.5 Submittals</p> <p>If the effective date of the AOP Renewal 4 falls on any date after January 1, then two different versions of all required reports would need to be prepared, compiled and submitted: one for the AOP Renewal 3 required content and a second report containing AOP Renewal 4 required content.</p>	Reduction of administrative burden	Regardless of the timing of AOP Renewal 4 issuance date, add new text specifying the scope of AOP Renewal 4 reporting period to coincide with the calendar year thereby excluding AOP Renewal 3 content and improving the efficiency and accuracy of the reports.
11	ATTACHMENT 1: Ecology Permits and Regulations Page 13 Line 1 "ABBREVIATONS" is misspelled.	Editorial	Correct typo.
12	ATTACHMENT 1: Ecology Permits and Regulations Page 13 Lines 25-27 Descriptions are merged.	Editorial	Correct.
13	ATTACHMENT 1: Ecology Permits and Regulations 1.4.2 DP: 242-A, Boiler 1, 2, and 3 (>5 MMBtu/hr – Fuel Oil) Page 24 Line 10 EPA Methods need updated. (This may be a global comment).	Editorial	Change to read: EPA Method 5 of 40 CFR 60, Appendix A-3 and EPA Method 202 of 40 CFR 51, Appendix M.
14	ATTACHMENT 1: Ecology Permits and Regulations 1.4.19 DP: Liquid Effluent Retention Facility Basins 41-44 & P-2025 Effluent Treatment Facility Page 46 Line 13 Figure is incorrectly identified.	Editorial	Change to read: Visible emissions from the ETF stack (Figure <u>A-1</u> of Order DE07NWP-003, Rev.2)
15	ATTACHMENT 1: Ecology Permits and Regulations 1.4.19 DP: Liquid Effluent Retention Facility Basins 41-44 & P-2025 Effluent Treatment Facility Page 46 Line 35 Figure is incorrectly identified.	Editorial	Change to read: A-1.

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16	ATTACHMENT 1: Ecology Permits and Regulations 1.4.19 DP: Liquid Effluent Retention Facility Basins 41-44 & P-2025 Effluent Treatment Facility Page 47 Line 16 Formatting issue.	Editorial	Line 16 should be indented to line up with the rest of the condition.
17	ATTACHMENT 1: Ecology Permits and Regulations 1.4.19 DP: Liquid Effluent Retention Facility Basins 41-44 & P-2025 Effluent Treatment Facility Page 47 Line 21 DE07NWP-003, Rev. 2 Condition 2.a better lines up with (3) Condition Approval for processing limits.	Editorial	Change to read: Condition 2.a.
18	ATTACHMENT 1: Ecology Permits and Regulations 1.4.25 DP: Ventilation Systems for 241-AN Tank Farm Page 75 Line 19 The interpretation of Approval Order DE05NWP-001, Rev. 2, Condition 3.3 Source Demonstration Assessment is that 1,3-dichloropropene sampling was required during the initial transfer from 241-AP to 241-AN and that this one-time evolution has been completed.	Editorial	Change to read: Upon initial waste transfer from the 241-AP Tank Farm to the 241-AN Tank
19	ATTACHMENT 1: Ecology Permits and Regulations 1.4.25 DP: Ventilation Systems for 241-AN Tank Farm Page 76 Line 20 Suggest adding "baseline" to better line up with Approval Order DE05NWP-001, Rev. 2, Condition 2.5 Reporting .	Editorial	Change to read: Results of baseline emission assessments conducted shall be submitted to
20	ATTACHMENT 1: Ecology Permits and Regulations 1.4.26 DP: Ventilation Systems for Single-Shell Tanks Categorical Waste Retrieval Page 77 Line 1 "Single" is misspelled.	Editorial	Correct typo.
21	ATTACHMENT 1: Ecology Permits and Regulations 1.4.26 DP: Ventilation Systems for Single-Shell Tanks Categorical Waste Retrieval Page 77 Line 17 For consistency with other discharge points and with Approval Order DE05NWP-002, Rev. 3, suggest removing "quantification" from EPA Method 9. (This may be a global comment).	Editorial	Change to read: (B) If triggered, EPA Method 9
22	ATTACHMENT 1: Ecology Permits and Regulations This may be a global comment. Page 87 Line 5 Page 87 Line 23 Page 88 Line 24 Page 93 Line 30 Page 146 Line 38 Page 153 Line 25 Page 154 Line 7	Editorial	Add "-." between "60" and "months".
23	ATTACHMENT 1: Ecology Permits and Regulations 1.4.32 DP: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 93 Line 25 DE11NWP-001, Rev. 4 section 1.1 better lines up with this Condition.	Editorial	Change to read: (E) Identification of any exceedance of emission limits detailed in DE11NWP-001, Rev. 4, section 1.1 shall be
24	ATTACHMENT 1: Ecology Permits and Regulations 1.4.32 DP: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 95 Line 9 DE11NWP-001, Rev. 4 section 1.1 better lines up with this Condition.	Editorial	Change to read: emissions of all TAP emission limits as described in section 1.1 of
25	ATTACHMENT 1: Ecology Permits and Regulations 1.4.32 DP: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 95 Line 11 Adding "and analysis" better lines up with DE11NWP-001, Rev. 4.	Editorial	Change to read: All sample collection and analysis activities will follow EPA approved procedures for
26	ATTACHMENT 1: Ecology Permits and Regulations 1.4.35 DP: Hanford Site Asbestos Landfill Page 104 Line 16	Editorial	Add "-." between "asbestos" and "containing".
27	ATTACHMENT 1: Ecology Permits and Regulations 1.4.81 DP: High-Purge Operation of Rotary Core Tank Sampling System Page 152 Line 30 For consistency with other discharge points and with Approval Order DE14NWP-001, suggest removing "quantification" from EPA Method 9.	Editorial	Change to read: (B) If triggered, EPA Method 9
28	ATTACHMENT 1: Ecology Permits and Regulations 1.4.82 DP: Ventilation Systems for 241-AW Tank Farm Page 156 Line 19 For consistency with other discharge points and with Approval Order DE18NWP-001, suggest removing "quantification" from EPA Method 9.	Editorial	Change to read: B) If triggered, EPA Method 9

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29	ATTACHMENT 1: Ecology Permits and Regulations 1.4.82 DP: Ventilation Systems for 241-AW Tank Farm Page 157 Line 33 Page 158 Line 29 Page 159 Line 19 Page 160 Line 2 Page 160 Line 40 DE18NWP-001 does not require Ecology to approve SAPs. This may be a global comment.	Editorial	Change to read: SAP, which is submitted to Ecology before sampling occurs and also upon subsequent revisions,
30	ATTACHMENT 1: Ecology Permits and Regulations 1.4.82 DP: Ventilation Systems for 241-AW Tank Farm Page 159 Line 29 DE18NWP-001 requires annual hexavalent chromium sampling instead of monthly.	Editorial	Change to read: calendar year, the annual sampling for hexavalent chromium shall then
31	ATTACHMENT 1: Ecology Permits and Regulations 1.4.105 DP: Effluent Treatment Facility Area Compression Ignition Engines Page 212 Line 12 Table number contains an extra "1".	Editorial	Change table number to: Table 1.4.105.1 Small Light Plant & Generator Engine Design
32	ATTACHMENT 1: Ecology Permits and Regulations 1.4.116 DP: Ventilation Systems for 241-AP Tank Farm Page 245 Line 8	Editorial	Change to read: (A) Visible emissions from each stack (296-A-048 and 296-A-049) must
33	ATTACHMENT 1: Ecology Permits and Regulations 1.4.116 DP: Ventilation Systems for 241-AP Tank Farm Page 246 Line 25 Page 248 Line 39 DE19NWP-003 does not require Ecology to approve SAPs.	Editorial	Change to read: SAP, which is submitted to Ecology before sampling occurs and also upon subsequent revisions,
34	ATTACHMENT 1: Ecology Permits and Regulations 1.4.116 DP: Ventilation Systems for 241-AP Tank Farm Page 248 Lines 16-17 Suggest changes to better line up with DE19NWP-003 mercury sampling requirements.	Editorial	Change to read (ii) If any valid mercury sampling result within 241-AP, including Method 29 metals testing, exceeds 5.77E-06 g/s for mercury, total mercury compounds, or any specific mercury compound.
35	ATTACHMENT 1: Ecology Permits and Regulations 1.4.116 DP: Ventilation Systems for 241-AP Tank Farm Page 248 Line 20 Suggest removing "elemental" to better line up with DE19NWP-003 mercury sampling requirements.	Editorial	Change to read: mercury. If sampling was triggered by pre-transfer sampling
36	ATTACHMENT 1: Ecology Permits and Regulations 1.4.116 DP: Ventilation Systems for 241-AP Tank Farm Page 249 Line 38 To be consistent with the Condition, suggest including required records instead of N/A.	Editorial	Change to read: Records of any required notifications and reports.
37	ATTACHMENT 1: Ecology Permits and Regulations 1.4.117 DP: Ventilation Systems for 241-A Tank Farm Page 251 Line 29 For consistency with Approval Order DE23NWP-001, suggest removing "quantification" verbiage from EPA Method 9.	Editorial	Change to read: Demonstrate compliance with the opacity limit using EPA Method 9;
38	ATTACHMENT 1: Ecology Permits and Regulations 1.4.117 DP: Ventilation Systems for 241-A Tank Farm Page 251 Line 30 For consistency with Approval Order DE23NWP-001, suggest editorial comments.	Editorial	Change to read: (C) Cease operations and contact Ecology to discuss options
39	ATTACHMENT 1: Ecology Permits and Regulations 1.4.117 DP: Ventilation Systems for 241-A Tank Farm Page 251 Line 34 For consistency with other discharge points and with Approval Order DE23NWP-001, suggest removing "If visual emissions are quantified" from EPA Method 9.	Editorial	Change to read: If triggered, EPA Method 9
40	ATTACHMENT 1: Ecology Permits and Regulations 1.4.117 DP: Ventilation Systems for 241-A Tank Farm Page 251 Line 39 For consistency with other discharge points and with Approval Order DE23NWP-001, suggest removing "visual emissions are quantified" from EPA Method 9.	Editorial	Change to read: (B) Records of any EPA Method 9 surveys.

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41	ATTACHMENT 1: Ecology Permits and Regulations 1.4.120 DP: Tank-Side Cesium Removal Heating, Ventilation, and Air Conditioning Generator Compression Ignition Engine Page 258 Line 3 Suggest adding a unique Permittee AEI ID.	Editorial	Change “N/A” to “E-TSCRHVAC-001”.
42	ATTACHMENT 1: Ecology Permits and Regulations 1.4.116 DP: Ventilation Systems for 241-AP Tank Farm Page 247 Lines 21-37 Update DE19NWP-003 for arsenic sampling and analysis conditions provided in letter 25-NWP-063, dated May 1, 2025.	Update per 25-NWP-063	Incorporate verbiage from 25-NWP-063 as appropriate to allow for a less sensitive arsenic method equivalent to 90% of WAC 173-460-150 small quantity emission rate or better.
43	ATTACHMENT 1: Ecology Permits and Regulations 1.4.79 DP: 222S Compression Ignition Engine for Direct Drive Ventilation (C) If engine is equipped with a DPF to comply with the emission standards in 40 CFR 60.4204, the DPF must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached	Consistency with approval order	The 222S CI Engine does not have a DPF. The license is written for a specific engine family, which does not contain a DPF. Please remove the condition to avoid unnecessary confusion during compliance inspections and annual reporting.
44	ATTACHMENT 1 Statement of Basis Section 3.1.7, page 23, lines 19-21	Ecology guidance	Consider rewording this sentence to referencing the Ecology and DOE agreed upon Ambient Air Boundary (AAB) and removing AERSCREEN.
45	STANDARD TERMS AND GENERAL CONDITIONS: Page 12, line 29 – “Source Test Manual – Procedure for Compliance Testing, Ecology 9/20/04”	Editorial	Revise reference to current version Publication 25-02-001 dated February 2025.
46	ATTACHMENT 1 Statement of Basis Section 3.1 – Page 17 – The example calculations shown in Sections 3.1.1 and 3.1.2 are using AP-42 emission factors and calculations. EPA issued an Enforcement Alert in 2020 (EPA 325-N-20-001 (EPA Reminder About Inappropriate Use of AP-42 Emission Factors Enforcement Alert)) that cautions against using AP-42 factors due to the low quality of the factors.	EPA Alert	Consider adding note about the use of AP-42 factors.
47	ATTACHMENT 1 Statement of Basis	General reference information	Suggest adding general emissions resources such as EPA SPECIATE (SPECIATE US EPA), EPA WebFIRE (WebFIRE Search US EPA) and California Air Toxic Emission Factor database (California Air Toxics Emission Factor California Air Resources Board). Also adding resources for EPA and CARB engine certifications EPA Certification Data Report (Annual Certification Data for Vehicles, Engines, and Equipment US EPA) and CARB Engine Certifications (New Vehicle and Engine Certification: Executive Orders for Compression-Ignition and Heavy-Duty Engines and Vehicles California Air Resources Board) would be helpful.