



March 20, 2026

Comments Submitted Electronically at:

<https://nw.ecology.commentinput.com/?id=MF9cbJZre>

Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, WA 99354

**RE: WTP NOC Approval Order - DE02NWP-002, Revision 4**

Thank you for the opportunity to comment on the revised Notice of Construction (NOC) Approval Order DE02NWP-002, Revision 4, for non-radioactive air emissions from the Waste Treatment and Immobilization Plant (WTP).

Hanford Challenge is a non-profit, public interest, environmental, and worker advocacy organization located in Seattle, WA. We are an independent 501(c)(3) organization incorporated in the State of Washington since 2008 and registered in Oregon. Our mission is to create a future for the Hanford Nuclear Site that secures human health and safety, advances accountability, and promotes a sustainable environmental legacy.

Hanford Challenge has members who work at the Hanford Site. Other members of Hanford Challenge work and/or recreate near Hanford, where they may also be affected by hazardous materials emitted into the environment by Hanford. All members have a strong interest in ensuring the safe and effective cleanup of the nation's most toxic nuclear site for current and future generations, and who are therefore affected by conditions that endanger human health and the environment.

Please update the revised NOC Approval Order DE02NWP-002, Revision 4, for non-radioactive air emissions from WTP to address the following concerns and comments:

- **Please make the Air Operating Permit a stand-alone document with NOC's going away once units are in operation:** As we stated in our comments on the draft Renewal 4 of the Hanford Site Air Operating Permit (AOP), the NOC's should go away once the unit is in operation.
  - Please update the process so that an NOC stays in place until the AOP is updated and then close out the NOC. Without this update, we have two different documents with conflicting data.
  - *For example*, there are cases where an NOC was issued for a site and then on the next AOP renewal the NOC was added to the permit, but the requirements are not the same yet both documents show as current. There are other cases where a letter is sent requesting a change years after the issuance of an NOC and Ecology agrees to the change in a letter, but the change is not made in the NOC or properly explained in the

- AOP. Those letters are not available to the public, so when you review the permit and NOC's on Ecology's webpage there is an unexplainable discrepancy.
- The NOC's should go away once the unit is in operation. Please update the AOP so that the AOP is a complete stand-alone document rather than referencing multiple other documents.
- **Please update the following so that sampling requirements are in compliance:** On page 8 it states "A. 40 C.F.R. Part 60, Subpart Dc, and Part 63, Subpart DDDDD, for BOF boilers." The sampling requirements do not comply with either subpart.
    - 40 C.F.R. 63 subpart DDDDD 63.7495(b) required compliance with this subpart by January 31, 2016, yet on page 16 of the NOC it states that burner replacement doesn't trigger the requirements. The requirements were triggered by the promulgation of subpart DDDDD, yet none of the boilers at Hanford are following this.
    - Please ensure that the source owner is responsible for identifying new requirements and complying with them by the date specified, and work with Ecology to update the permit.
    - Please address how you are currently demonstrating compliance for the boilers with the January 31, 2016 implementation date for 40 C.F.R. 63 Subpart DDDDD.
  - **Please address why there is one NOC for the entire WTP complex, instead of various NOC's for differing types of units:** The revised NOC Approval Order DE02NWP-002, Revision 4, for non-radioactive air emissions from WTP is very hard to follow. With so many sources and different types of sources the document jumps around a lot. Please explain why there is one NOC for the entire WTP complex and why is it one discharge point, 1.4.23, in the AOP. It would be better to have separate NOC's for differing types of units.
  - **Include sampling and testing requirements in the NOC instead of referencing other documents:** This comment echoes a concern we stated in our comments on the draft Renewal 4 of the AOP. Referencing testing and sampling requirements instead of directly including the requirements makes it hard for the permittee (and anyone else looking) to find the information necessary to demonstrate compliance. Please include the requirements directly in the NOC document.
    - *For example:* 5 c. Source testing for NOx and PM<sub>10</sub> from BOF emission units is separately established under the Hanford PSD Permit. Source testing for the Hanford PSD permit must include opacity using 40 C.F.R. Part 60, Appendix A-4, Test Method 9. Why aren't the requirements for NOx and PM<sub>10</sub> included directly in the NOC document?

Sincerely,



Nikolas Peterson, Executive Director, Hanford Challenge