



September 9, 2026

*Comments Submitted Electronically at:*

<https://ecology.commentinput.com/?id=ebZB6NrCH>

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

RE: DST exhausters NOC Approval Order – DE11NWP-001, Revision 5

Thank you for the opportunity to comment on the Notice of Construction (NOC) Approval Order DE11NWP-001, Revision 5 modifying operations at the 241-SY Double-Shell Tank (DST) Farm. This proposed change would change the authorization of the existing exhausters from DE11NWP-001, Revision 4 to a new draft Approval Order DE26NWP-002.

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.

We are primarily concerned that Hanford is allowed to use sampling methods that no other industries use. Why? It is not enough to only use NIOSH, OSHA, and/or EPA ambient guidance to analyze air samples. The methods used to collect air samples need to be specified in the NOC. With industries of all types primarily using EPA source methods, how can the public get a clear understand of how Hanford air emissions compare to other industries? Hanford's underground high-level waste storage tanks are a dynamic environment with rapidly moving stack gas. What modifications have been made to the OSHA, NIOSH, EPA ambient methods identified in the NOC to address the different conditions of rapidly moving stack gas? How have the modifications been validated? What qualifications are required by the staff validating the modifications? The easiest fix to address these concerns is to require all testing methods to be EPA methods.

The use of non-standard methods at Hanford creates doubt in the results when it comes to the safety of the public. Please address the following concerns and comments in the proposed Notice of Construction (NOC) Approval Order DE11NWP-001, Revision 5:

- **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 DE11NWP-001 Rev 5 so that sampling requirements are in compliance with EPA methods:**
  - DE11NWP-001 Rev 5 continues the sampling language that is in Rev 4. Please update sampling requirement so that they are in accordance with the specifics that Ecology states an AOP should contain: <https://ecology.wa.gov/regulations-permits/permits-certifications/air-quality-permits>
  - [WAC 173-400-105 \(4\) Source testing](#), lists methods available for stack testing. Update Rev 5 to reflect the required testing methodology.
  - Please identify the regulation that allows for alternate OSHA, NIOSH or EPA Ambient Methods.

Sincerely,

A handwritten signature in black ink that reads "Nikolas F. Peterson". The signature is written in a cursive, flowing style.

Nikolas Peterson, Executive Director, Hanford Challenge