Draft Renewal 4 Hanford Site Air Operating Permit (AOP) Number 00-05-006

PUBLIC COMMENT PERIOD: October 5 through November 4, 2026

Number	Comment	Basis	Recommendation
1	ATTACHMENT 1: Ecology Permits and Regulations Section 2.1, Visible Emission Surveys and Visual Opacity Quantification, states "Visible emission surveys must be performed in accordance with EPA Method 22. To determine that corrective action or opacity determination is not required, visible emission surveys must be conducted during daylight hours when the emission unit is operating. 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. EPA Method 22 requires a minimum of 6 consecutive minutes of readings per survey. A minimum of 3 surveys per evaluation event must be performed. The surveys may be conducted consecutively, or the observer may take a break of up to 15 minutes between surveys. If the Permittee determines that visible emissions are present, EPA Method 22 surveys may be cut short or skipped if the corrective action or opacity determination is initiated immediately. When any visible emission surveys are performed, a record will be established indicating if visible emissions were or were not observed. Any unusual circumstances with a survey, including readings taken outside of daylight hours, must be documented." This text establishes EPA Method 22 as a routine compliance requirement and misstates the method by requiring a minimum 6-minute observation period and three surveys per evaluation event. WAC 173-400-040 does not require EPA Method 22 surveys, and EPA Method 22 does not establish 6 minutes as a minimum observation length or compliance threshold. Existing AOP text in this section has been sufficient to support compliance with visible emissions observations at the Hanford Site, and no basis has been identified for replacing it with a more prescriptive condition that exceeds the governing standard and increases implementation burden through additional training and cost.	There is no basis for visible emission surveys to be performed by EPA Method 22 in federal regulations 40 CFR 63 or 40 CFR 60. WAC 173-400-040(2) provides: "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." This regulation establishes the substantive visible-emissions standard and identifies Method 9A for opacity determinations, but it does not require routine EPA Method 22 surveys or prescribe a minimum 6-minute survey duration. EPA Method 22 uses an "observation period," meaning the total time spent observing the emission unit for visible emissions, with visible-emission time accumulated and compared to the applicable regulatory threshold. Section 11.4.2 of EPA Method 22 uses 6 minutes only as an example: "In other words, if the regulation prohibits emissions for more than 6 minutes . . . ." It does not establish 6 minutes as a required minimum observation period. For that reason, the condition adds procedural requirements not found in WAC 173-400-040 and inaccurately characterizes Method 22. The permit should not impose more costly methods to meet regulatory requirements when another management practice could do so more efficiently. The current requirement for routine visual emissions surveys does not require additional training of staff. Imposing EPA Method 22 surveys for all routine visual emissions would impose undue costs on DOE and Contractors which are not required by the regulations.	Remove requirement for visual emission surveys by Method 22 in Attachment 1 Section 2.1. Delete first two paragraphs of Attachment 1 Section 2.1 and replace with the following text as established in the current AOP Renewal 3: "Visible emission surveys must be conducted during daylight hours and during periods when the emission unit is operating. When any visible emission surveys are performed, a record will be established indicating if visible emissions were or were not observed. If the operator observes visible emissions for more than 10 consecutive minutes during the observation period, the cause(s) of the visible emissions will be determined and corrective actions taken as necessary, or opacity must be quantified."
2	Attachment 1, Section 2.6 Non-Waste Treatment and Immobilization Plant Boiler/Steam Generating Unit Source Tests Refer to Enclosure 1 "Comment Basis".	Compliance Issue DOE Letter 26-ECD-0106 DOE Letter 05-AMRC-0291 Ecology Letter dated June 15, 2005 from Michael A. Wilson, Ecology, to Leif Erickson, DOE	Permittee requests that the language concerning AOP Inspection 26.AQ06 and non-compliance with 97NM-138 periodic testing requirements be removed from the AOP.
3	Attachment 1, Section 2.10 Engines Subject to Code of Federal Regulations Title 40, Part 63, Subpart ZZZZ Section 2.10 appears incomplete for existing emergency CI engines greater than 500 bhp. Section 1 identifies multiple existing emergency CI engines greater than 500 bhp which are directed to Section 2.10 for compliance requirements. However, Section 2.10 only includes subsections for engines ≤500 bhp.	Clarification	Either add subsection(s) in 2.10 to address engines >500 bhp or remove the reference listed in the DPs.
4	Section 2.11 Engines Subject to Code of Federal Regulations Title 40, Part 60, Subpart IIII, and Code of Federal Regulations Title 40, Part 63, Subpart ZZZZ Section 2.11 addresses certification, maintenance, hour meters, testing, and diesel particulate filter (DPF) backpressure monitoring. However, it does not appear to expressly incorporate the applicable fuel requirements under 40 CFR 60.4207 as a general section-level condition.	Clarification	Add a general fuel provision.
5	Attachment 1, Section 2.13 In addition to Ecology's well-documented approval for removal of compliance testing for the 97NM-138 boilers, WDOE letter 26-NWP-152, "Closeout of inspection 25.AQ05 for Hanford Air Operating Permit (AOP) Discharge Points (DPs) 1.4.3, 1.4.7, 1.4.8, 1.4.57, and 1.4.73", stated there are "no recommended or required actions" for these DPs. Including a schedule of compliance for these natural gas boilers in AOP renewal 4, is inappropriate.	WDOE letter 26-NWP-152	Remove discharge points 1.4.3, 1.4.7 and 1.4.8 (i.e., natural gas boilers) from section 2.13 or remove the entire section.
6	Attachment 1, Section 2.13 Schedule of Compliance Refer to Enclosure 1 "Comment Basis".	Compliance Issue DOE Letter 26-ECD-0106	Permittee requests that the compliance schedule at Section 2.13 tied to 97NM-138 testing and the sensitivity analysis be removed.
7	Attachment 1, Discharge Point 1.4.100 The emission unit is identified in the the field as 283EG. The L-849 designation referes to the construction project associated with the emission unit. Retaining the project number in the description is preferred to tie it back to the NOC permit.	Update naming of the Emission Unit	Suggest changing to the following: 1.4.100 DP: Central Plateau Water Treatment Facility 283EG Sanitary Water Storage in 200 East Permittee AEI ID(s): T-283EG-001 Location and Description: 200E Area, tank located near 282E Building, 283EG Potable Water Tank via Project L-849.

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8	Attachment 1, Discharge Point 1.4.101 The emission unit is identified in the the field as 283WG. The L-850 designation referes to the construction project associated with the emission unit. Retaining the project number in the description is preferred to tie it back to the NOC permit.	Update naming of the Emission Unit	Suggest changing to the following: 1.4.101 DP: Central Plateau Water Treatment Facility 283WG Sanitary Water Storage in 200 West Permittee AEI ID(s): T-283WG-001 Location and Description: 200W Area, tank located near 282W Building,283WG Potable Water Tank via Project L-850.
9	Attachment 1, Discharge Point 1.4.112: 241-AP Tank Farm North Area Compression Ignition Engines Page 179 Line 14 Table 1.4.112.2 title is missing "and" between "Medium Light Plant" and "Generator Engine Design."	Editorial	Change 1.4.112.2 table title to read: "Table 1.4.112.2 Medium Light Plant and Generator Engine Design"
10	Attachment 1, Discharge Point 1.4.116: Ventilation Systems for 241-AP Farm Page 188 Line 31 Ecology has given the permittee approval to use direct reading instruments for ammonia monitoring. (Citation: June 29, 2023, email from Matt Williams, Ecology, to Tom Beam, Washington River Protection Solutions).	Clarification	Change to read: "Method 29 for metals and Draeger tubes or direct reading instruments for ammonia."
11	Attachment 1, Discharge Point 1.4.116: Ventilation Systems for 241-AP Farm Page 190 Line 33 There are not any emission limits associated with TSCR-MISC as all emissions are controlled through exhauster 296-A-048 and/or 296-A-049. The condition in (5) is associated with equipment and activity restrictions.	Inaccurate Requirement NOC Approval Order No. DE19NWP-003 Condition 2.b.i.	Change to read: "Condition: Equipment and Activity Restrictions"
12	Attachment 1, Discharge Point 1.4.116: Ventilation Systems for 241-AP Farm Page 190 Line 39-40 There are not any periodic monitoring requirements associated with TSCR-MISC as all emissions are controlled through exhauster 296-A-048 and/or 296-A-049.	Inaccurate Requirement NOC Approval Order No. DE19NWP-003 Condition 2.b.i.	Change Periodic Monitoring requirements to "N/A".
13	Attachment 1, Discharge Point 1.4.116: Ventilation Systems for 241-AP Farm Page 191 Line 2 Condition (6) should be MONITORING & RECORDKEEPING to match requirements provided in DE19NWP-003, Condition 4.	Consistency NOC Approval Order No. DE19NWP-003 Condition 4.	Change to read: "Condition: MONITORING & RECORDKEEPING"
14	Attachment 1, Discharge Point 1.4.118 The Approval Order includes that "the dates, duration, and cause of any periods where control technology is out of service must be documented and maintained." This language is not included in the AOP Renewal 4 conditions.	NOC Approval Order No. DE25NWP-001, Condition 4.f	Suggest adding "Dates, duration, and cause of any periods where control technology is out of service" to Section 1.4.118, Condition 3, Required Records, or part of another condition within Section 1.4.118.
15	Attachment 1, Discharge Point 1.4.118 Condition 1 (C) "Notification is required within one month if maximum fuel consumption rate is exceeded." The Approval Order language is that the Permittee must notify ecology within one month of "exceeding the maximum hourly fuel consumption in Approval Condition 2.b.i, as calculated annually." The fueling rate is only required to be calculated annually using the average of four consecutive quarters. The AOP condition, as written, is not clear that the notification is within one month of performing the calculation, not within one month of the exceedance occurring. The permittee would not know an exceedance has occurred until the calculation has been performed, which is only required annually.	NOC Approval Order No. DE25NWP-001, Condition 6.c.i	Suggest revising the language to "Notification is required within one month of annual calculation if maximum fuel consumption rate is exceeded."
16	Attachment 1, Discharge Point 1.4.118 Condition 5 "For discontinued operation, the following apply…" The WESF air compressor does not run continuously. The compressor runs for a few hours at a time to support capsule transfer operations. It is not clear what is considered discontinued operations.	Clarity	Revise condition to clarify what is considered discontinued operations requiring notification. Suggest rephrasing to: "If routine maintenance is cancelled in anticipation of or due to an extended period of nonoperation, the engine will be considered to have entered discontinued operations. For discontinued operation, the following apply…"
17	Attachment 1, Discharge Point 1.4.118 Condition 5 (A) For discontinued operation, the following apply: (A) A notification, including a shutdown status maintenance plan, must be submitted within 30 days. Maintenance performed during the shutdown must allow startup in a timely manner with minimum amount of work and emissions. Allowable emission levels as of the date of shutdown cannot increase upon reopening.____The AOP language does not match the Approval Order language.	NOC Approval Order No. DE25NWP-001, Condition 6.g.ii.A	Revise language to "Maintenance must be performed during the shutdown to allow startup in a timely manner with minimum amount of work and emissions."

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Number	Comment	Basis	Recommendation
18	Attachment 1, Discharge Point 1.4.2: 242-A, Boiler 1, 2, and 3 (>5 MMBtu/hr – Fuel Oil) Page 25 Lines 6-13 Refer to Enclosure 1 "Comment Basis".	Compliance Issue DOE Letter 05-AMRC-0291 Ecology Letter dated June 15, 2005 from Michael A. Wilson, Ecology, to Leif Erickson, DOE	Remove Condition (12) pertaining to the 97NM-138 periodic testing requirement.
19	Attachment 1, Discharge Point 1.4.23(5) Requirement Source PSD-02-01, Amendment 3(A). PSD Amendment 3 Approval Condition 17.3 requires "operating hours" during the semiannual period. There is no requirement to break out the operating hours on a monthly basis.	PSD Amendment 3 Approval Condition 17.3	Under Condition 5A, please change "monthly operating hours" to "operating hours". Under Required Records recommend "monthly hours of operation" be changed to "hours of operation".
20	Attachment 1, Discharge Point 1.4.23(5) Requirement Source PSD-02-01, Amendment 3(B). PSD Amendment 3 Approval Condition 17.3 and 17.4 do not have this language as a requirement.	PSD-02-01, Amendment 3(B)	Please remove "description of corrective actions taken".
21	Attachment 1, Discharge Point 1.4.23(13)(D). Permit application numbers can change more frequently than AOP Renewal updates	Editorial	Change from "must not exceed the abated emission rates identified in 24590-WTP-RPT-ENV-01-009, Revision 1, Pages B-3, B-4, and B-27 through B-39" to "must not exceed the abated emission rates identified in 24590-WTP-RPT-ENV-01-009 Revision 1 or current approved application"
22	Attachment 1, Discharge Point 1.4.23(14)(A) and (B). PSD-02-01 Amendment 3 has an "or" statement that requires only one of the two limits be met.	PSD-02-01 Amendment 3	Recommend deletion of the statement "(both limits must be met)".
23	Attachment 1, Discharge Point 1.4.23(15)(D). Table 5.5 covers the turbine generators and Table 5-6 covers the fire water pumps.	Consistency	Please delete Table 5-6. (D)
24	Attachment 1, Discharge Point 1.4.23(16)(A). PSD-02-01 Amendment 3 has an "or" statement that requires only one of the two limits be met.	PSD-02-01 Amendment 3	Please delete the statement "(both limits must be met)".
25	Attachment 1, Discharge Point 1.4.23(21)	Editorial	Change from "must not the emission rates" to "must not exceed the emission rates".
26	Attachment 1, Discharge Point 1.4.23(21). Table 5.5 covers the turbine generators and Table 5-6 covers the fire water pumps.	Consistency	Please delete Table 5-5. (D)
27	Attachment 1, Discharge Points 1.4.23(23) and 1.4.23(24). PSD-02-01 Amendment 3 has an "or" statement that requires only one of the two limits be met.	PSD-02-01 Amendment 3	Please delete the statement "(both limits must be met)".
28	Attachment 1, Discharge Point 1.4.80 Location and Description states "This DP covers multiple EUs/activities…." This Discharge Point (DP) covers one emission unit.	Consistency	Recommend revision to covey there is one emission unit.
29	Attachment 1, Discharge Point 1.4.121 Waste Treatment and Immobilization Plant Material Handling Facility South-40 Operational Engineer Tent Generator Compression Ignition Engine has been removed per DOE Letter # 26-ECD-0032 issued 03/24/2026. This letter transmitted an AOP Off-Permit Change to Ecology to remove this stationary engine.	DOE Letter # 26-ECD-0032	Please remove Discharge Point 1.4.121 from AOP.
30	Attachment 1, Discharge Point 1.4.25: Ventilation Systems for 241-AN Tank Farm Page 68 Lines 10-11 The interpretation of the Approval Order No. 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. In the first public comment period, the permittee suggested re-wording as follows: "Upon initial waste transfer from the 241-AP Tank Farm to the 241-AN Tank". In the Response to Comments Hanford Site Air Operating Permit, Renewal 4, Ecology indicated that this initial comment was accepted. However, this change was not included in the latest AOP Renewal 4 draft.	Initial comment not incorporated.	Change to read: "Upon initial waste transfer from the 241-AP Tank Farm to the 241-AN Tank, …."
31	Attachment 1, Discharge Point 1.4.3(5) 97NM-138 section 7.1.2 requires performance testing for larger boilers, defined in that section as ≥ 200 BHP. The DP 1.4.3 boiler is only 30 BHP so performance testing is not required under 97NM-138. In addition, natural gas boilers are not subject to 40 CFR 63 Subpart DDDDD emission limits and operating limits per 40 CFR 63.7500(e). Because performance testing under Subpart DDDDD only serves to demonstrate compliance with emission limits, and natural gas boilers are not subject to Subpart DDDDD emission limits, the performance testing requirements of Subpart DDDDD do not apply to DP 1.4.3.	AO 97NM-138, 40 CFR 63.7500(e)	Remove requirement (5) (i.e., source testing) for discharge point 1.4.3.
32	Attachment 1, Discharge Point 1.4.32: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 84 Lines 20-27 & Page 92 Line 33 Operating the exhauster systems in accordance with BACT and tBACT should be captured under (12) OPERATIONAL LIMITS instead of (3) EMISSION LIMITS.	Consistency	Move condition on page 84 lines 20-27 to page 92 starting at line 33.

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33	Attachment 1, Discharge Point 1.4.32: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 85 Lines 27-31 & Page 91 Line 13 Baseline Assessments conditions are redundant.	Redundant Information	Add "Results of baseline emission assessment must be submitted to Ecology within 90 days of completion of such assessment." to page 91 line 13. Remove baseline assessments from Test Frequency on page 85 lines 27-31.
34	Attachment 1, Discharge Point 1.4.32: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 83 Lines 12-13 Page 86 Lines 18-19 Page 87 Line 8 Page 88 Line 21 Page 90 Line 16 Page 91 Lines 14-15 & Line 25 Throughout DP 1.4.32, it states "in accord with EPA approved procedures…" However this is not consistent with Approval Order DE11NWP-001 Approval Condition 3.3 nor with DP 1.4.32 Condition (3) Periodic Monitoring (A) [page 84 lines 2-3].	Inaccurate Requirements NOC Approval Order No. DE11NWP-001, Rev. 4 Condition 3.3	Replace "in accord with EPA approved procedures…" with "analytical methods for the analysis shall be EPA, OSHA, or NIOSH approved or by approved equivalent method."
35	Attachment 1, Discharge Point 1.4.32: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 87 Lines 11-12 & Page 88 Lines 39-42 Test Frequency requires the permittee to evaluate the data to determine if NDMA is below permit conditions. This condition is redundant to (7) EMISSION LIMITS (J) which also requires the permittee to evaluate data to determine if NDMA has remained below the permit conditions.	Redundant Information	Remove lines 11-12 from page 87.
36	Attachment 1, Discharge Point 1.4.32: Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms Page 84 Lines 28-30 In the first public comment period, the permittee suggested re-wording as follows: "(E) Identification of any exceedance of emission limits detailed in DE11NWP-001, Rev. 4, Section 1.1 shall be…" In the Response to Comments Hanford Site Air Operating Permit, Renewal 4, Ecology indicated that this initial comment was accepted. However, this change was not fully included in the latest AOP Renewal 4 draft.	Initial comment not fully incorporated.	Change to read: "(E) Identification of any exceedance of emission limits detailed in DE11NWP-001, Rev. 4, Section 1.1 must be…"
37	Attachment 1, Discharge Point 1.4.33, Condition 1 The analyte should be 1,4-dichlorobenzene instead of 1,3-dichlorobenzene	Approval Order DE12NWP-001	Suggest changing to the following: Test Frequency: (A) Annually for ammonia, chloroform, and 1,4-dichlorobenzene.
38	Attachment 1, Discharge Points 1.4.66, 1.4.67, 1.4.68, and 1.4.70 or Attachment 1, Discharge Points 1.4.83 and 1.4.105 through 1.4.11 Naming Configuration Inconsistency with engine DP naming configuration. Some tank farm engine DPs have "241-" in the title before the specific tank farm designation, while others do not.	Editorial	For consistency with DP engine naming configuration, either add "241-" to DPs 1.4.66, 1.4.67, 1.4.68 and 1.4.70 or remove "241-" from DPs 1.4.83 and 1.4.105 through 1.4.114.
39	Attachment 1, Discharge Point 1.4.68: AY/AZ Farm DMI-LT Light Tower Compression Ignition Engines Page 115 Line 3 Location and Description for 1.4.68 DP should be "AY/AZ Farm" instead of "A Complex".	Editorial	Change to read: "200E Area, AY/AZ Farm."
40	Attachment 1, Discharge Point 1.4.68: AY/AZ Farm DMI-LT Light Tower Compression Ignition Engines Page 115 Line 7 Flex Configuration Requirements for 1.4.68 DP should be for "AY/AZ Farm" instead of "A Complex".	Editorial	Change to read: "Light plants at the AY/AZ Farm in a flexible configuration, "
41	Attachment 1, Discharge Point 1.4.7(10) 97NM-138 section 7.1.2 requires performance testing for larger boilers, defined in that section as ≥ 200 BHP. The DP 1.4.7 boilers are 125 BHP so performance testing is not required under 97NM-138. In addition, natural gas boilers are not subject to 40 CFR 63 Subpart DDDDD emission limits and operating limits per 40 CFR 63.7500(e). Because performance testing under Subpart DDDDD only serves to demonstrate compliance with emission limits, and natural gas boilers are not subject to Subpart DDDDD emission limits, the performance testing requirements of Subpart DDDDD do not apply to DP 1.4.7.	AO 97NM-138, 40 CFR 63.7500(e)	Remove requirement (10) (i.e., source testing) for discharge point 1.4.7.

Number	Comment	Basis	Recommendation
42	Attachment 1, Discharge Point 1.4.8(10) On June 15, 2005, Ecology approved the removal of the 5-year testing requirement for the 300 Area boilers per AOP 00-05-06, Renewal 3 section 2.6. This same language exists in AOP Renewal 1 issued in January 2007 and Renewal 2 issued in April 2013. In addition, natural gas boilers are not subject to 40 CFR 63 Subpart DDDDD emission limits and operating limits per 40 CFR 63.7500(e). Because performance testing under Subpart DDDDD only serves to demonstrate compliance with emission limits, and natural gas boilers are not subject to Subpart DDDDD emission limits, the performance testing requirements of Subpart DDDDD do not apply to DP 1.4.8.	AOP 00-05-06, Renewal 3 section 2.6, 40 CFR 63.7500(e)	Remove requirement (10) (i.e., source testing) for discharge point 1.4.8.
43	Attachment 1, Discharge Points 1.4.81: High-Purge Operation of Rotary Core Tank Sampling System Page 128 Line 33 Why was the condition "except for those approved under another NOC (e.g. DE11NWP-001, Rev. 1)." removed from this version of AOP Renewal 4? This verbiage was included in the last AOP draft.	Clarification	Add "except for those approved under another NOC (e.g. DE11NWP-001, Rev. 1)."
44	Attachment 1, Discharge Points 1.4.82: Ventilation Systems for 241-AW Tank Farm Page 133 Lines 1-3 Dimethyl mercury is excluded from Approval Order DE18NWP-001 Section 2.3 Recordkeeping. DE18NWP-001 Section 2.3 #5 reads "Any maintenance and operational records for the maintenance and operation of abatement control technology used to demonstrate compliance with Approval Conditions 1.1.1, 1.1.2, 1.1.4, and 1.2.1." Approval Condition 1.1.3, which addresses dimethyl mercury, is specifically excluded.	Inaccurate Requirement NOC Approval Order No. DE18NWP-001 Condition 2.3.5.	Remove Required Records (B) from (5) EMISSIONS LIMITS for dimethyl mercury.
45	Attachment 1, Discharge Point 1.4.98 The emission unit is identified in the the field as 282WE. The L-895 designation referes to the construction project associated with the emission unit. Retaining the project number in the description is preferred to tie it back to the NOC permit.	Update naming of the Emission Unit	Suggest changing to the following: 1.4.98 DP: 282WE 200W Emergency Compression Ignition Engine Permittee AEI ID(s): E-282WE-001 Location and Description: 200W Area, emergency generator CI engine adjacent to 282WD via Project L-895.
46	Attachment 1, Discharge Point 1.4.99 The emission unit is identified in the the field as 283WE.	Update naming of the Emission Unit	Suggest changing to the following: 1.4.99 DP: Central Plateau Water Treatment Facility Discharge to Treated Effluent Disposal Facility Lagoons 283WE Permittee AEI ID(s): P-283WE-001 Location and Description: 200W Area, lagoons near Building 6653.
47	Attachment 1, Discharge Point 1.4.99 The test method and require records misidentified the wrong parameter to measure and record. For the, lagoons, it should be chloroform instead of chlorine residuals.	Approval Order DE19NWP-001, Condition 4h	Suggest changing to the following: Test Method: Chloroform concentration in the Sludge Lagoons must be sampled, in accordance with an appropriate SAP Required Records: SAP(s), O&M manual(s), water sampling records, chloroform concentrations. Records generated for other permits can be used for this recordkeeping.
48	Attachment 1, Additional Discharge Point The emission unit 283WS, identified as L-897 emergency generator in Approval Order DE12NWP-001, was commisioned in March 2025. Initial notification was sent to Ecology on March 13, 2025.	Approval Order DE12NWP-001	Suggest adding new discharge Point to the following: 1.4.XXX DP: 282WE 200W Emergency Compression Ignition Engine Permittee AEI ID(s): E-283WS-001 Location and Description: 200W Area, emergency generator CI engine adjacent to CPWTF via Project L-897.
49	Attachment 1, Section 2.10.1, Condition 1 "If an oil analysis program meeting the requirements of 40 CFR 63.625(i) is used…" 40 CFR 63.6625(i) is only for CI engines. 40 CFR 63.6625(j) is for SI engines. Both citations allow utilization of an oil analysis program.	40 CFR 63.6625(j)	Suggest revision of the statement to "If an oil analysis program meeting the requirements of 40 CFR 63.6625(i) or 40 CFR 63.6625(j) is used..."
50	Attachment 1, Section 2.10.1, Condition 1 (D) "Oil and oil filter must be replaced if Total Base Number is less than 30% of the value when new, viscosity has changed by more than 20% from the value when new, or water content is greater than 0.5% by volume." This is specific to CI engines under 40 CFR 63.6625(i). Oil analysis is also allowed for SI engines under 40 CFR 63.6625(j).	40 CFR 63.6625(j)	Suggest revising statement to "For stationary CI engines, ..." and adding another Condition part for stationary SI engines stating "For stationary SI engines, oil and oil filter must be replaced if Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the value when new; viscosity of the oil has changed by more than 20% from the viscosity of the value when new; or water content is greater than 0.5% by volume."

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51	Attachment 1, Section 2.10.3, Condition 2 (B) "An oil analysis program meeting 40 CFR 63.6625(i)…" 40 CFR 63.6625(i) is only for CI engines. 40 CFR 63.6625(j) is for SI engines.	40 CFR 63.6625(j)	Please revise the statement to include "An oil analysis program meeting 40 CFR 63.6625(j)…""
52	Attachment 1, Section 2.11.1, Condition 1, Periodic Monitoring © "If required by 40 CFR 60.4211(g), initial performance testing." 40 CFR 60.4211(g)(3) also contains subsequent performance testing.	40 CFR 60.4211(g)(3)	Consider removing the word "initial."
53	Attachment 1, Section 2.11.2, Condition 1, Periodic Monitoring © "If required by 40 CFR 60.4211(g), initial performance testing." 40 CFR 60.4211(g)(3) also contains subsequent performance testing.	40 CFR 60.4211(g)(3)	Consider removing the word "initial."
54	Attachment 1, Section 2.12.1, Condition 2 (A) and Section 2.12.2, Condition 1 (A) "In accordance with 40 CFR 60.4243(a), purchase an engine certified to meet the emission standards in 40 CFR 60.4233(a), (b), (c), (d), or (e), as applicable, for the specific model year, engine design, fuel, and use. If modified or reconstructed, comply with 40 CFR 60.433(f) and 60.4243(c)." 40 CFR 60.4243(a) is only applicable to those engines that must comply with 40 CFR 60.4233 (a) through (c). If the engine must comply with 40 CFR 60.4233(d) and (e), 40 CFR 60.4243(b) is applicable. 40 CFR 60.4243(b)(1) and (2) allow for purchasing either a certified engine or a non-certified engine.	40 CFR 60.4243(a) and (b)	Correct requirement to accurately reflect the regulation. Suggest rephrasing to: "(A) Either: (i) In accordance with 40 CFR 60.4243(a), purchase an engine certified to meet the emission standards in 40 CFR 60.4233(a), (b), or (c), as applicable, for the specific model year, engine design, fuel, and use; or, (ii) In accordance with 40 CFR 60.4243(b)(1), purchase an engine certified to meet the emission standards in 40 CFR 60.4233(d) or (e), as applicable, for the specific model year, engine design, fuel, and use; or, (iii) In accordance with 40 CFR 60.4243(b)(2), purchase a non-certified engine and demonstrate compliance with the emission standards in 40 CFR 60.4233(d) or (e) and according to the requirements specified in 40 CFR 60.4244, as applicable, for the specific model year, engine design, fuel, and use, or (iv) If modified or reconstructed, comply with 40 CFR 60.4233(f) and 60.4243(c)."
55	Attachment 1, Section 2.12.1, Condition 2 (B) (ii) and Section 2.12.2, Condition 1 (B) (ii) "If the engine and control devices are not operated and maintained according to the manufacturer's emission-related instructions, demonstrate compliance as a non-certified engine by meeting the requirements of 40 CFR 60.4243(a)(2) or 60.4243(b)(2), as appropriate for the specific model year, engine design, fuel, and use. Keep a maintenance plan and records of conducted maintenance and, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions." 40 CFR 60.4243(b)(2) is for purchased non-certified engines, not for if the engine and control devices are not operated and maintained according to the manufacturer's emissions-related instructions.	40 CFR 60.4243(b)(2)	Correct the requirement to reflect applicability of 40 CFR 60.4243(b)(2) more accurately, as well as reference conducting performance testing as applicable. Suggest rephrasing to: "(B) Either: (i) If purchasing an engine certified to meet the emission standards in 40 CFR 60.4233(a), (b), (c), (d), or (e), as applicable, operate and maintain the engine and control devices according to the manufacturer's emission-related instructions, keep records of conducted maintenance, and meet any requirements specified in 40 CFR Part 1068 Subparts A through D which specifically apply; or, (ii) If purchasing an engine certified to meet the emission standards in 40 CFR 60.4233(a), (b), (c), (d), or (e), as applicable, and the engine and control devices are not operated and maintained according to the manufacturer's emission-related instructions, demonstrate compliance as a non-certified engine by meeting the requirements of 40 CFR 60.4243(a)(2), as appropriate for the specific model year, engine design, fuel, and use. Keep a maintenance plan and records of conducted maintenance and, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions; or, (iii) If purchasing a non-certified engine and demonstrating compliance with the emission standards in 40 CFR 60.4233(d) or (e), demonstrate compliance as a non-certified engine by meeting the requirements of 40 CFR 60.4243(b)(2), as appropriate for the specific model year, engine design, fuel, and use. Keep a maintenance plan and records of conducted maintenance and, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions."
56	Attachment 1, Discharge Points 2.12.1: Emergency Spart Ignition engines (as defined for Federal Regulations) Page 215 Line 4 Section title contains a typo.	Editorial	Correct "Spart" to "Spark".
57	Attachment 1, Table 1.4.23 Location and Description prior to Table 1.4.23 state MHF engines are under separate DPs. MHF stationary engines have all been removed and are no longer in the AOP permit. Please see DOE letters 26-ECD-0032, 25-ECD-0048, and 26-ECD-0016.	26-ECD-0032, 25-ECD-0048, and 26-ECD-0016	Please remove statement from permit.
58	Attachment 1, Table 1.4.23.1, Second Row, Boilers A, B, and C are 50.2 MMBtu/hr each. Boilers A, B, and C have the same size and BTU capability as Boilers D, E, F.	Editorial	Please change "Boilers, A, B, and C – 50 MMBtu/hr each" to "Boilers, A, B, and C – 50.2 MMBtu/hr each"
59	Attachment 1, Table 1.4.23.1, Seventh Row, Laboratory Facility, Notes column.	Editorial	Please Change "(CC5)" to "(C5)" to align with WTP terminology.

Number	Comment	Basis	Recommendation
60	Attachment 1, Table 1.4.23.1, MHF Row: All MHF stationary engines have been permanently removed and associated Off-Permit Changes have been provided to Ecology. Please see DOE letters 26-ECD-0032, 25-ECD-0048, and 26-ECD-0016."	26-ECD-0032, 25-ECD-0048, and 26-ECD-0016	Please remove MHF Row and discharge point from AOP.
61	Table of Contents and Tables The page numbers in the Table of Contents and Tables do not match the page number at the bottom of the pages.	Editorial	Update the "Table of Contents" and "Tables" fields to ensure the listed page numbers are accurate.
62	Attachment 1, Section 2 It would be beneficial to clearly identify which maintenance activities are not emission-related when a manufacturer provides only a general maintenance schedule and does not distinguish emission-related items. Including this clarification would strengthen the basis for compliance by helping DOE and Ecology-personnel consistently separate routine maintenance from maintenance that directly affects emissions performance. EPA already provides specific examples of activities that are not considered emission-related, which offers a practical and defensible framework for making that distinction. Maintenance on associated equipment does not also affect engine emissions.	40 CFR 1039.125(e)	Include a statement in the AOP: Emission-related maintenance excludes - adding engine oil, - changing air, fuel, or oil filters, - servicing engine-cooling systems or fuel-water separator cartridges or elements; - adjusting idle speed, governor, engine bolt torque, valve lash, or injector lash; - checking belts and hoses - battery check - maintenance on associated equipment (pump assembly, generator set, etc.)
63	Attachment 1, Section 2 Limited-use engines, such as emergency engines, operate only intermittently. In fact, emergency engines typically only run for maintenance or readiness testing. Because manufacturer maintenance schedules are generally written for continuously operating engines, short-term maintenance checks, such as daily and weekly inspections, should be allowed at longer intervals for these engines.	Operational Experience	Include a statement in the AOP: Maintenance is not required when the engine is out of service, such as during LOTO, when disconnected, or when it is not being operated. This maintenance applies only when the engine is in service and operating during the maintenance period. For low-use engines, such as emergency engines, short-term maintenance checks (for example, daily and weekly checks) may be performed at longer intervals based on operating experience and sound engineering judgment.

Enclosure 1: Comment Basis (page 1 of 2)

1.4.2 DP: 242-A, Boiler 1, 2, and 3 (>5MMBtu/hr – Fuel Oil) (12), Sections 2.6 and 2.13:

Permittee submits the following comments on 1.4.2 DP: 242-A, Boiler 1, 2, and 3 (>5MMBtu/hr – Fuel Oil) Condition (12), Section 2.6 and Section 2.13 of draft Attachment 1 to the Hanford AOP:

1.4.2 DP: 242-A, Boiler 1, 2, and 3 (>5MMBtu/hr – Fuel Oil) Condition (12) and Section 2.6 – Non-Waste Treatment and Immobilization Plant Boiler/Steam Generating Unit Source Tests

As a general matter, since Attachment 1 is designated as an enforceable portion of the draft AOP, it must reflect only applicable requirements and settled compliance obligations. The permit should not include discussion of an inspection report (AOP Inspection 26.AQ06, transmitted via Letter 26-NWP-070) with disputed allegations of non-compliance in the enforceable portion of the AOP (see 26-ECD-0106, attached hereto as Enclosure A).

Permittee disputes any allegation of non-compliance with the 5-year testing requirement as set forth in the 97NM-138 Notice of Construction (NOC) Approval Order. As discussed in 26-ECD-0106, Permittee had requested, and Ecology explicitly approved, removal of the 5-year testing requirement for the boilers in question. See 05-AMRC-0291 and June 15, 2005, Ecology letter (attached hereto as Enclosures B and C). Ecology stated that it "approves the proposed change and will implement necessary modifications in the AOP." At the time, Ecology also emphasized the required public reviews as part of the AOP renewal process that were needed to incorporate those modifications. The public review process was followed, and the AOP was subsequently renewed multiple times following the same public review process, with the same language explaining the inapplicability of the 5-year testing requirement based on technical information and compliance history.

Ecology states in the draft AOP, as it did in AOP Inspection 26.AQ06, that "Ecology agreed and removed boiler source testing from this AOP but did not revise the underlying approval order which established testing as an applicable requirement." Permittee notes that 05-AMRC-0291 includes the following statement: "[DOE] requests that the compliance (stack) testing required in the NOC Approval Order 97NM-138 be removed from the approval order and the AOP." While the lack of a parallel and corresponding modification to 97NM-138 was an oversight, Permittee – and the public – have reasonably relied on Ecology's express statements in the AOP regarding the inapplicability of this requirement; the subsequent renewals of the AOP with those statements conformed to all procedural requirements and opportunities for public comment or objection.

An agency's own administrative or procedural oversight should not be a permissible basis for alleging non-compliance in the AOP. The Title V program requires each permit to "contain terms and conditions that assure compliance with all applicable requirements at the time of permit issuance." (WAC 173-401-600). Where the applicability of a requirement is ambiguous or in question (or in this case, the requirement was specifically affirmed by Ecology in writing and through multiple AOP renewals to be inapplicable), it would be inequitable for Ecology to allege retroactive non-compliance in the AOP due to a procedural gap that the agency itself overlooked.

Enclosure 1: Comment Basis (page 2 of 2)

Given the record, the permittee does not believe 5-year source testing is warranted; the technical basis and justification for removing the requirement were provided to and accepted by Ecology, as memorialized in the June 15, 2005, letter and multiple renewals of the AOP. If Ecology believes the 97NM-138 periodic testing requirement should be reinstated, then Ecology should formally rescind the June 15, 2005, letter and provide a regulatory and technical basis for reinstating 5-year source testing. This should also be addressed accordingly in the draft AOP. However, it would be inequitable and inappropriate to allege non-compliance for any 5-year testing following the 2005 approval to remove the testing requirement and the incorporation of that modification into the AOP.

Permittee requests that the language concerning AOP Inspection 26.AQ06 and non-compliance with 97NM-138 periodic testing requirements be removed from the AOP. The permittee also requests that Condition (12) requiring source testing be removed from 1.4.2 DP: 242-A, Boiler 1, 2, and 3 (>5MMBtu/hr – Fuel Oil).

Section 2.13 – Schedule of Compliance

In 26-ECD-0106, Permittee specifically objected to the proposed schedule to complete testing under 40 CFR 63, Subpart DDDDD by the end of calendar year (CY) 2026. As set forth in detail in Permittee's response to AOP Inspection 26.AQ06, a vendor contract for sampling was awarded in September 2026. **DOE** is in the process of procuring and installing the necessary sampling ports, which must be completed before the sampling can be performed. The sampling must also be performed while the boilers are running at approximately 90% capacity (i.e., full capacity). The next available opportunity to run the boilers at or above 90% capacity, once the new sampling ports are installed, would be Evaporator Campaign-17, which is tentatively scheduled to take place in CY 2027. Thus, the earliest by which the Subpart DDDDD sampling can be completed is most likely sometime during the 2nd half of CY 2027. Based on this information, Ecology's continued insistence on establishing a 2026 schedule for Subpart DDDDD testing is arbitrary and capricious. Ecology's purported alternative means of compliance (permanent shutdown of the boilers if testing is not complete by December 31, 2026) is also arbitrary and capricious; Ecology should instead establish a reasonable and realistic timeframe for compliance that takes into account the constraints of when meaningful and compliant sampling can actually be performed.

Accordingly, Permittee requests that Ecology revise the compliance schedule for Subpart DDDDD testing and delete item 3 for alternative compliance.

Lastly, Permittee contests the inclusion of any compliance schedule with respect to the 97NM-138 testing requirements and the sensitivity analysis. A schedule of compliance with enforceable remedial measures and milestones may be included in an AOP only when the source has been shown to be out of compliance with an applicable requirement [WAC 173-401-630(2)(c) and **WAC 173-401**-510(2)(h)(iii)(C)]. For all the reasons set forth above, the allegations of non-compliance with respect to the 97NM-138 testing requirements are disputed and unresolved. In addition, Permittee also disputes the need for a sensitivity analysis tied to the use of obstructive stack caps. As set forth in 26-ECD-0106, the existing caps are part of the original equipment configuration and design for each boiler. The caps have functioned as intended as part of compliant boiler operations since original installation. Permittee requested additional information from Ecology (identification of the applicable regulatory driver) for the sensitivity analysis, which Ecology has not yet provided. Thus, it would be improper to rely on these disputed assertions and findings as the basis for inclusion of a compliance schedule with enforceable remedial actions and dates.

Permittee requests that the compliance schedule at Section 2.13 tied to 97NM-138 testing and the sensitivity analysis be removed from the AOP.