



Response to Comments Hanford Site Air Operating Permit, Renewal 4

July 28 – Sept. 19, 2025

For the **Nuclear Waste Program**

Washington State Department of Ecology

Richland, Washington

October 2026, Publication 26-05-012



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¹ <https://apps.ecology.wa.gov/publications/summarypages/2605012.html>

² www.ecology.wa.gov/contact

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties Served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Introduction

The Washington State Department of Ecology's Nuclear Waste Program (Ecology) regulates air pollution sources at the Hanford Site. In particular, Ecology is the permitting authority for new or modified sources requiring new source review under Washington Administrative Code (WAC) 173-400-110 and the Title V Air Operating Permit (AOP) at Hanford.

When a renewal, significant modification, or reopening for cause of the Title V AOP is proposed, Ecology must hold a public comment period to allow the public to review the proposed permit and provide formal feedback. (See WAC 173-401-800 for Public Notice and Opportunity for Public Comment requirements for the AOP.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.
- Describe and document public involvement actions.
- List and respond to all significant comments received during the public comment period and any related public hearings.

This Response to Comments is prepared for:

Comment period	Hanford Site Air Operating Permit, Renewal 4 July 28 – Sept. 19, 2025
AOP Number	#00-05-006
Permittee	U.S. Department of Energy
Original Issuance date	June 20, 2001 (Renewal/Revision 0)
Renewal 4 Effective date	To be determined

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our webpage, [Hanford Cleanup](https://www.ecology.wa.gov/Hanford)³.

³ <https://www.ecology.wa.gov/Hanford>

Reasons for Issuing the Permit

The Title V AOP for the Hanford Site combines air permitting requirements (state-only and Title V applicable requirements) established by Notice of Construction approval orders, state and federal regulations, the radioactive air emissions license, and county regulations on outdoor burning into a single permit. The intent of the Title V program is to ensure that the permittee and permitting authority are regularly evaluating compliance with all applicable requirements by incorporating them into one AOP with additional review, reporting, and certification procedures. The Title V program does not include authority to establish new limits or standards, but in some cases may require addition of periodic monitoring if there is no periodic monitoring required by the standard itself. By issuing Renewal 4, Ecology is bringing the AOP up to date with changes for the Hanford Site since issuance of Renewal 3. This ensures that compliance evaluations will be made to current standards.

Public Involvement Actions

Ecology encouraged public comment on the entire AOP, including non-enforceable Statements of Basis and enforceable attachments, during a 51-day public comment period held July 28 through Sept. 19, 2025.

The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 929 members of the public.
- Emailed a notice announcing the start of the comment period to the Hanford-Info email list, which has 1,712 recipients.
- Posted the comment period notice on the Washington Department of Ecology – Hanford’s Facebook page.

The following public notices for this comment period are in [Appendix A](#) of this document:

- Focus sheet
- Notices sent to the Hanford-Info email list
- Notice posted on the Washington Department of Ecology – Hanford’s Facebook page

List of Commenters

The table below lists the names of organizations or individuals who submitted a comment on the Hanford Site AOP permit renewal. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Anonymous	Citizen
Bill Green	Citizen
United States Department of Energy - Hanford Field Office (Bryan Trimberger)	Permittee
Hanford Challenge (Liz Mattson)	Citizen Organization

Attachment 1: Comments and Responses

Description of comments:

Ecology accepted comments from July 28 through Sept. 19, 2025. This section provides a summary of comments that we received during the public comment period and our responses, as required by RCW 70A.15.2260(7). Comments are grouped by individual and each comment is addressed separately.

I-1: ANONYMOUS CITIZEN

Comment I-1-1

1. It would be much more helpful if the draft renewal could be provided to the public with red line/ strike out changes. Without them it is hard to see what was changed and whether there might be omissions.

Response to I-1-1

Thank you for your comments. General Ecology practice is to not provide redline for renewals because all language is open for comment. Prior to the first public notice on Renewal 4 of the Hanford Site AOP (AOP.2025.1D draft notice), this was confirmed as consistent with dangerous waste permitting for the Hanford Site and Title V AOPs being issued out of Ecology's Eastern and Central Regional Offices.

For Renewal 4 of the Hanford Site AOP specifically, there have been waves of overlapping revisions for site changes, regulatory updates, clarity improvements, tech editing (including fonts, formatting, and best practices for accessibility), and other reasons that make a single unified redline extremely difficult to review. Instead, Ecology has maintained summaries of each set of changes and the sections affected as part of the Administrative Record. If there are questions about revisions for specific sections/equipment/topics, please see the instructions on contacting Ecology and accessing the Administrative Record for assistance.

Comment I-1-2

2. Page 8 of the draft renewal asserts that PermaFix Northwest (PFNW) in Richland, WA, does not meet the criteria for inclusion in a major source subject to the AOP Regulation [i.e., WAC 173-401-200(19)]. Per the draft renewal the exclusion criteria are described in the Statement of Basis.

2.1. The Statement of Basis (SOB), Section 2.0, asserts that PermaFix is not under the "common control" of DOE Hanford Operations and therefore not part of the Hanford Site due to a long list of criteria, provided on page 8. Page 9 of the Statement of Basis refers to "following paragraphs" provided to support the determination of this exclusion. However, there are no "following paragraphs" with any justifications at all. The text omits any supporting material and moves on right to Section 3. I would appreciate if Ecology can add "Following Paragraphs" to describe and support each excluded facility.

2.2. I believe PermaFix must be added to the AOP now, as shown by quantitative review of the exclusion criteria given in the SOB Page 8. For example, criteria include:

Is the percentage of the entity's output provided to DOE Hanford Site operations offices greater than 50%? is an exclusion criterion. No answer is provided in the Statement, but a review of the recent "Draft Supplemental Environmental Impact Statement" for Perma-Fix Northwest Mixed Waste Facility shows (page 13) that the "the largest percentage of this waste [low level radioactive waste] has come from USDOE's Hanford site and other USDOE sites." This implies more than 50%. Further, the draft SEIS on page 15 shows the largest percentage of "MLLW has come from USDOE's Hanford site, as shown in parenthesis in Table 3." Table 3 shows that in

2019, Hanford provided 76.4 of 85.3 metric tons total of MLLW processed at Perma-Fix. That is 90% from Hanford, far exceeding 50%.

In the future, Perma-Fix anticipates receiving even more waste from Hanford and even adding capacity, as the WTP ramps up. Perma-Fix conducts quarterly earnings calls as required by the Securities and Exchange Commission. Transcripts of these calls are available to the public. In the transcript of the 1st Quarter 2025 Perma-Fix SEC Earnings Investors Call, PFNW stated "we're seeing a significant increase in Hanford to this point of about \$2,000,000 to \$3,000,000 a month in waste coming from Hanford, which is dramatically more than we've seen in the past..." The increase in waste from Hanford means an even higher percentage above 50%. In addition, the Contact Handled Waste Processing Permitting Plan (25-ECD-0086, May 2025) states "Significant volumes of TRUM waste that is subject to treatment in accordance with M-091 milestones are in storage at Hanford and must be treated prior to shipment to WIPP." These TRUM wastes are shipped to PFNW. HNF-19169, Rev 25 states "Perma-Fix Northwest is the only currently utilized capability for repackaging TRUM waste." In addition, HNF-19169 Figure 4-4 calls for at least 3,000 cubic meters per year of TRUM to be processed for the foreseeable future. PFNW is awash in Hanford waste, source of far more than 50% of PFNW output.

DOE Site Operations "non-Control" of Perma-Fix is also a criterion for exclusion. Recently, DOE has taken responsibility for Perma-Fix operations by sending Hanford Contractor Staff to Perma-Fix to ensure packages shipped from PFNW to Hanford are not externally contaminated. This is because recently, 11 of 12 containers shipped by PFNW to DOE were externally contaminated. CPCC- 01382, page 3 states "during the next shipment from PFNW, CPCCo RCTs will be on hand to observe PFNWs process during loading, unloading, and packaging. CPCCo RCTs will perform whole-body surveys of the Teamsters [at PFNW] involved in the loading. If nothing is detected, the shipment will proceed. CPCCo Radiological Control will continue to discuss and educate the PFNW crew to develop and improve their process. CPCCo will continue the observations for a few shipments."

As you can see, DOE controls whether shipments occur and is performing real time, in-person evaluations of PFNW performance. Shipments are not allowed without DOE approval - so DOE has control of PFNW operations. The Defense Nuclear Facilities Safety Board has similarly noted that DOE Contractor CPCCo management is "working with the vendor" to identify the cause and prevent future occurrences. DOE is immersed in PFNW operating procedures, which affect public health. DOE can shut PFNW down any time just by stopping shipping. There is no DOE "non-control." When DOE controls the use of more than half of PFNW capacity, as a certainty they indirectly control the whole of PFNW economic and operating life.

3. In the Statement of Basis, Ecology concludes PermaFix Northwest's Richland Facility is "not part of the Hanford Site" based on reference to WAC 173-401- 200(17). The AOP regulation WAC 173-401-200(17) defines exempt activities as "insignificant" per WAC-173-401-530. WAC-173-401-530 defines "insignificant" in terms of emission thresholds. WAC-173-401-530(4) says a facility is "significant" if its emissions are above 2 tons per year for volatile organic compounds (VOCs). This category applies to acetonitrile, which is planned to be shipped to PFNW from the ETF Facility due to WTP operations. Further, the "threshold level" specific to Acetonitrile

(Methyl Cyanide) is 0.5 tons per year, per WAC-173-401-531. Doesn't this mean a new source review is needed if the potential to emit from PFNW is above 0.5 tons?

Looking at related data, the recent NOC for Hanford's ETF facility (25-ECD-0097, Notice of Construction Application Form), shows the expected annual emission of acetonitrile at ETF is 2.53 tons/year. Since ETF is shipping acetonitrile concentrate to PFNW from ETF, it would help if you can evaluate the PFNW potential to emit this and other VOCs, since PFNW may no longer be exempt from a new source review. Lastly, the PFNW anticipated waste input increase from Hanford from about 10million/year to \$30 million/yr will necessarily increase the amount of hazardous chemicals that create an air emissions risk.

4. PermaFix is still a major risk, yet there is little public oversight of events and ongoing "problems with production," [described by PFNW in the 2nd Qtr SEC Earnings Call transcript.] PFNW production difficulties have recently included an overexposed worker per NRC event report No. 57762, June 23-24, 2025, and recent transport of multiple externally contaminated containers over public roads documented at <https://pdw.hanford.gov/document/AR-35999>. Washington DOH does not publish the PFNW annual environmental reports for public access. There is no transparency, and transparency would be helped by adding PFNW to the Hanford AOP. Residents in Richland (like me) are affected and need to know more.

5. Looking at WAC 173-401-200(19), PFNW is under the common control of DOE/DOE contractors, belonging to the same industrial grouping, all the pollutants have the same two-digit codes (same waste), and as a minimum, the PFNW acetonitrile Potential to Emit may not be exempted per WAC 173-400-530. And it's only going to get worse.

6. As an additional example, the Defense Nuclear Facilities Safety Board Resident Inspectors Weekly Report of July 25, 2025, shows that "While overpacking selected drums with external corrosion/damage, workers discovered a separate drum that appeared to have internally developed corrosion that penetrated the drum wall. Radiological surveys identified high alpha contamination levels on the drum and pallet. The discovery of a significant number of failed drums during recent movements to improve the fire protection posture of the waste storage facilities continues to raise questions regarding the adequacy of the container surveillance process for ensuring operability of the safety-significant containers, and the need for more rigorous radiological controls during drum movement (see 5/23/2025 report)."

Overpacked, corroded, TRUM drums, which have high external alpha contamination (such as plutonium) are an increasing risk to the public if shipments are allowed to continue to PFNW. DOE's decisions to ship all this waste to PFNW is an export of risk to Richland that takes DOE emissions "off the books."

Please add PermaFix Northwest to the Hanford Air Operating Permit.

Thank you for considering these comments.

Response to I-1-2

For these comments, it is important to note that a significant change in EPA guidance on source determinations was issued on November 26, 2019, with the memorandum "Interpreting "Adjacent" for New Source Review and Title V Source Determinations in All Industries Other

Than Oil and Gas" (2019 Adjacency Guidance). The language in Section 2.0 of the Statement of Basis (Statement) for the Standard Terms and General Conditions (STGC) had not been updated for the 2019 Adjacency Guidance for the AOP.2025.1D draft of Renewal 4. The second public notice draft, AOP.2026.1D, has been updated to acknowledge that Ecology will follow this guidance for any source determinations going forward.

Ecology had not updated AOP language in the AOP.2025.1D Statement for the STGC because previous determinations, including the one for PermaFix Northwest (PFNW), were not formally revisited. This was based upon the 2019 Adjacency Guidance stating that "EPA does not think it would be appropriate to revisit or revise previously-issued final permit actions that were based on a reasonable application of regulatory requirements and then-existing policies to a given set of facts." PFWN was reviewed and determined to be a separate source under the previous EPA guidance. That led to separate air permitting for PFWN, which was under the authority of the Benton Clean Air Agency (BCAA). At this time, Ecology does not have any evidence that the historical determination for PFWN was incorrect, given "then-existing policies" of EPA.

Ecology did review the 2019 Adjacency Guidance in preparation for potential future determinations and found that it will actually weaken arguments that PFWN, and similar facilities, should be considered part of the Hanford Site. EPA has specifically reversed their previous interpretation that functional interrelatedness should be considered when determining whether sources are adjacent, which has been the primary argument that PFWN should be considered part of the Hanford Site.

EPA acknowledges in the 2019 Adjacency Guidance that it has, in the past, considered functional interrelatedness in adjacency. This is explained under Background, Historical EPA Implementation of Statutory and Regulatory Definitions. However, EPA now states that the decision by the U.S Court of Appeals for the Sixth Circuit's decision in Summit Petroleum Corp. v. EPA found that "EPA's use of interrelatedness in determining whether sources were "adjacent" was unreasonable and contrary to the plain meaning of the term."

As now addressed in the Statement for the STGC, Section 2.0, Ecology will no longer be considering functional interrelatedness in source determinations going forward. We are also keeping language in Section 2.0 which addresses how the historical source determinations, like the one for PFWN, were made under previous EPA guidance.

I-2: BILL GREEN

Comment I-2-1

COMMENT 1: a) The draft (40 C.F.R. 70.2) Hanford Site Air Operating Permit, Number 00- 05-006, Renewal 4 (hereafter The Permit) does not appear to consider any additive or synergistic risks to the public from the presence of both radioactive regulated air pollutants (40 C.F.R. 70.2) and non-radioactive regulated air pollutants.

b) Please provide the process/procedure, if any, Ecology uses to set emission limits when both radioactive regulated air pollutants and non-radioactive regulated air pollutants are

encountered at any emissions unit (40 C.F.R. 70.2) or from any source of fugitive emissions (40 C.F.R. 70.2).

BACKGROUND:

According to Ecology's announcement for the public comment period for The Permit:

"Three agencies administer the Hanford Site AOP. Ecology regulates the nonradioactive criteria and toxic air emissions [in Attachment 1]. Health regulates radioactive air emissions [in Attachment 2]. The Benton Clean Air Agency regulates outdoor burning [in Attachment 3]." [State of Washington, Department of Ecology, "Hanford Site Air Operating Permit Renewal 4, Public Comment Period", Publication 25-05-012, July, 2025 at 2.] See RCW 70A.15, and WAC 173-401.

Quoting from RCW 70A.388.040 (formerly codified at RCW 70.98.050):

"(1) The department of health is designated as the state radiation control agency, . . . , and shall be the state agency having sole responsibility for administration of the regulatory, licensing, and radiation control provisions of this chapter." RCW 70A.388.040

Thus, it appears only the Department of Health has the requisite statutory authority to regulate and enforce radioactive regulated air pollutants, whereas "Ecology only regulates the nonradioactive criteria and toxic air emissions" in accordance with RCW 70A.15 and WAC 173-401.

Response to I-2-1

Ecology does not consider additive or synergistic risks of radioactive and non-radioactive air pollutants because there is no authority or regulatory mechanism to do so. Until the appropriate legislative and regulatory processes are used to create those applicable requirements, Ecology must follow the regulations as they are currently written.

In particular, it would be inappropriate for Ecology to consider creating new requirements in this manner through a Title V process. As stated by EPA in their January 9, 2024, proposed rulemaking "Clarifying the Scope of "Applicable Requirements" Under State Operating Permit Programs and the Federal Operating Permit program" (EPA-HQ-OAR-2023-0401; FRL-9118-01-OAR): "the title V operating permit program is a vehicle for compiling air quality control requirements from other CAA programs and for providing requirements necessary to assure compliance with such requirements, but not for creating or changing applicable requirements. Put simply, title V is a catch-all, not a cure-all."

Washington state regulations are already more stringent than federal requirements for both radioactive air emissions and toxic air pollutants. This is reflected in the applicable requirements that have been incorporated into the Hanford Site AOP from NOC approval orders and Radioactive Air Emissions License (RAEL) FF-01. But these applicable requirements are based upon state law and regulations which have been established through appropriate legislative and rulemaking processes, including public participation.

Ecology will, therefore, continue to follow the regulations as they are written when evaluating non-radioactive air pollutants for NOC approval orders under Chapters 173-400 and 173-460

WAC. Health will do the same when evaluating radionuclides for RAEI FF-01 under Chapter 246-247 WAC. Ecology will then follow the appropriate processes for Chapter 173-401 WAC and 40 C.F.R. Title 70 to incorporate these requirements into the Hanford Site AOP.

Comment I-2-2

COMMENT 2:

a) Correct citations. For example, AOP (Rev. 3) cites to RCW 70.92 as giving Health authority to regulate radionuclides. Revised Code of Washington (RCW) 70.92 codifies “Provisions in buildings for aged and handicap persons”. The appropriate statutory authority should be RCW 70.98, “Nuclear energy and radiation act”¹ though this statute has subsequently been re-codified in RCW 70A.388.

b) Either update citations that are no longer in force in accordance with rule 12 of (The) Blue Book: A Uniform System of Citations, or provide the updated citation where the original statute has been re-codified. For example, RCW 70.98 was re-codified as RCW 70A.388. If Ecology determines RCW 70.98 is more appropriate than RCW 70A.388 then the former statute should be cited as follows: RCW 70.98 (date of the code addition cited), with a date inside parentheses following the citation.

Response to I-2-2

Ecology has corrected the noted citation for the AOP.2026.1D draft. This includes an update for the recodification of RCW 70 to 70A.

Comment I-2-3

While I did receive a link to Energy's AOP application in Mr. Williams email of August 6, 2025, I am concerned that this information was not made available to other interested members of the public. I am also unable to locate a link to Energy's application on Ecology's public comment webpage: ([Public involvement - Washington State Department of Ecology](#)). This webpage supported public review of the draft Hanford Site Air Operating Permit, No. 00-05-006, Renewal

¹ In 2016 Ecology committed to make the correction from RCW 70.92 to RCW 70.98 in its response to two separate public review comments. However, Ecology failed to make that correction.

“... Ecology is only showing the first paragraph of this comment in this summary. For the complete comment with all citations, footnotes, and explanations, please refer to Exhibit D.

Line 1 on page iv of the Statement of Basis for Standard Terms and General Conditions contains the following statement: “Health regulates radioactive air emissions under the authority of RCW 70.92 . . .”. Citing to RCW 70.92 is incorrect. The title of RCW 70.92 is “PROVISIONS IN BUILDINGS FOR AGED AND HANDICAPPED PERSONS”.

Ecology Response:

Ecology agrees: Public Comments: DRAFT Hanford Site Air Operating Permit, No. 00-05-006, Revision 4 Bill Green September 16, 2025, page 2 of 2 Line 1 on page iv of the Statement of Basis for Standard Terms and General Conditions will be changed from: “Health regulates radioactive air emissions under the authority of RCW 70.92 . . .” to “Health regulates radioactive air emissions under the authority of RCW 70.98 and 70.94....”

Department of Ecology, State of Washington, “Response to Comments Hanford Air Operating Permit, Revision B March 22 – April 24, 2015, with extension to May 8, 2015”, Publication no. [16-05-014], July 2016, at 24 (Emphases retained from original.) See also Ecology response to Hanford Challenge Comment 107 on pg. 54.

4 (The Permit). Forty Code of Federal Regulation (CFR) 70.7(h) requires public review be supported by ". . .the application, all relevant supporting materials, including those set forth in §70.4(b)(3)(viii) of this part, and all other materials available to the permitting authority that are relevant to the permit decision; . . ." 40 C.F.R. 70.7 (h)(2) ". EPA has determined that "materials available to the permitting authority that are relevant to the permit decision" means the information that the permitting authority has deemed to be relevant by using it in the permitting process.

It is not possible for the public to conduct an adequate review of Health's Nuclear Energy and Radiation Act (NERA) license (Attachment 2) absent all relevant supporting material. Conspicuously missing from Ecology's review material are any Notice of construction (NOC) application material submitted by Energy to Health. Such NOC applications are the bases for enforceable terms and conditions.

While requirements of 40 CFR 70 and WAC 173-401 are not directly applicable to Health, EPA has previously determined requirements of 40 C.F.R. 70, including 40 C.F.R. 70.7(h)(2), apply, through Ecology as the Permitting Authority, to Attachment 2 of The Permit.

"EPA agrees that Ecology's failure to provide all relevant materials supporting the NERA license [Attachment 2] has prevented the public from knowing how the title V permit might be said to meet the requirements of Subpart H. This, in turn, means that the public lacked the opportunity to meaningfully participate in the permitting process and that the unavailability of such materials could have resulted in a deficiency in the title V permit." ["In the Matter of U.S. Department of Energy – Hanford Operations, Order on Petition" No. X-2016-13 (Oct. 15, 2018) at 12; And, "Ecology, as the issuer of the Hanford Title V Permit, bears the ultimate responsibility for ensuring the requirements of Subpart H are appropriately addressed in the permit." *Id.* at 11]

Please provide the public with all relevant supporting materials and re-start public review.

Thank you for considering my additional comment.

Response to I-2-3

This response to comments is being published in coordination with a second public comment period on the updated AOP.2026.1D draft of Renewal 4 of the Hanford Site AOP. As discussed further below, Ecology will be more explicit about the files which are available for inspection as part of the administrative record for this public notice, and where they are located, in the public notice for the second comment period.

As addressed in EPA's response to Petition No. X-2016-13, cited by this comment:

On July 19, 2017, Ecology submitted a letter to the EPA explaining its intent to process an anticipated permit-renewal application to be submitted by DOE. In the letter, Ecology acknowledged the 2016 Petition and stated that it would "make available to the public, upon request, copies of the draft permit, the application, and all relevant supporting materials, or provide an email or website address from which interested persons may obtain such materials." Ecology also committed to "mak[ing] available information used

by [Health] to implement the [NERA] license it issued to [DOE], pursuant to 40 C.F.R. part 61, Subpart H, which license is included as part of the Hanford Title V Permit."

All files noted in this comment were available to members of the public for inspection during the first comment period on the AOP.2025.1D draft. As Ecology noted in the first public notice: "The administrative record for this renewal is too large for website posting but is available for inspection" with contact information to request more information "including how to view administrative record files."

WAC 173-401-800(2)(e)(i) requires that the draft permit and statement of basis be available on Ecology's website. WAC 173-401-800(2)(e)(ii) requires the administrative record be available "in at least one location near the Chapter 401 source" which can be a physical location or the permitting authority's website. Primarily due to the radioactive air emissions NOC applications noted in this comment, the first administrative record was over 2,000 files and 2 gigabytes of data. In accordance with WAC 173-401-800(2)(e)(ii)(B), Ecology determined that this was too large to provide as a single download and too many individual files to navigate and selectively download.

Instead, Ecology made DVDs of the administrative record available for inspection at the office of our Nuclear Waste Program at 3100 Port of Benton Blvd. in Richland, Washington. This is less than a mile from the southern property boundary of the Hanford Site, making it a physical location near the source. Specific files were provided, upon request, via email.

The first public notice could have been more explicit in addressing the contents of the administrative record so that members of the public were better informed on what was available. WAC 173-401-800(2)(e)(ii)(B) states that "Supporting materials available only in hardcopy or too large for posting on a website must be identified and made available upon request." For the AOP.2026.1D draft comment period, Ecology is providing more detail on the types of supporting materials which make up the administrative record.

A-1: UNITED STATES DEPARTMENT OF ENERGY - HANFORD FIELD OFFICE

Please see [attachment 2](#).

O-1: HANFORD CHALLENGE

Comment O-1-1

To Whom It May Concern,

Thank you for the opportunity to comment on the draft Renewal 4 of the Hanford Site Air Operating Permit (AOP).

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.

Commercial and industrial businesses that emit large amounts of air pollution must get an air operating permit. An Air Operating Permit is a master document that lists all of the air pollution requirements that apply to a business or industry. The Department of Ecology and other clean air agencies in Washington State issue these permits.

Please update the Hanford Site Air Operating Permit to address the following concerns:

Specify How the US Department of Energy's (DOE) Hanford Contractors Demonstrate Compliance: It remains unclear how DOE Hanford contractors are expected to demonstrate ongoing compliance with emission limits.

We urge the Washington State Department of Ecology to revise the AOP to include:

- Specific monitoring protocols and data reporting formats
- Defined performance metrics and thresholds for compliance
- Public access to compliance data and enforcement outcomes
- Clear contractor responsibilities and corrective actions in case of violations

These additions would strengthen transparency, accountability, and public trust in the permitting process.

Response to O-1-1

Thank you for your comments. Ecology does aim to ensure that monitoring protocols, data reporting formats, and limits/thresholds specified in applicable requirements are properly identified in the AOP. If there are cases where applicable requirements are potentially missing, we would appreciate specific comments to identify those gaps.

That said, applicable requirements for Title V often allow the Department of Energy to generate records which fit a general description, develop their own monitoring protocols through a Sampling and Analysis Plan, or even select between multiple compliance options at their own discretion. Ecology has limited authority, under Title V, to gap fill or otherwise modify these requirements as they are incorporated into the AOP.

In particular, Ecology did not identify any equipment at the Hanford Site which would be subject to Compliance Assurance Monitoring (CAM) requirements under 40 C.F.R. Part 64. CAM is the primary driver for an AOP to have more detail regarding monitoring than would be specified in an underlying applicable requirement. However, it only applies to emission units which meet the applicability criteria in 40 C.F.R. 64.2(a) and which don't meet the exemptions in 64.2(b).

When Ecology reviewed CAM for Renewal 4, every emission unit considered either: did not have an uncontrolled potential to emit for any pollutant which exceeded a Title V threshold by itself [40 C.F.R. 64.2(a)(3)]; did have an uncontrolled potential to emit which exceed one or more of those thresholds, but did not use a control device to meet an emission limit or standard for that pollutant [40 C.F.R. 64.2(a)(1) and (2)]; or did meet these criteria, but was exempt because the relevant emission limit or standard was proposed by EPA itself after November 15, 1990 [40 C.F.R. 64.2(b)(1)].

Records which document compliance and enforcement are generally public records which can be requested or already appear in the Hanford Site Administrative Record (<https://pdw.hanford.gov/>). There are limited circumstances where applicable requirements include direct public reporting or participation, especially when it comes to compliance evaluation. Ecology's Nuclear Waste Program is expected to operate consistently with the other Ecology offices and programs which issue Title V AOPs in the state and, ultimately, how the Title V program is implemented nationwide. That would include how compliance is evaluated and reported.

Contractor responsibilities will not be identified in the Hanford Site AOP. Ecology practice, state-wide, is to issue Title V AOPs specifically to the owner/operator that employs the Responsible Official as defined in WAC 173-401-030(29). Even if contractors or subcontractors are used for daily compliance activities, they would not be the ones held directly responsible for noncompliance under the Washington and federal Clean Air Acts. This practice may be different than the one for the Hanford Site dangerous waste permit, but that permit is issued under an entirely different regulatory structure and case history.

Comment O-1-2

Ensure the Air Operating Permit Functions as a Standalone Document: The Air Operating Permit (AOP) should serve as a complete, self-contained set of instructions for demonstrating compliance. As currently drafted, the permit requires readers to cross-reference multiple external regulations, approval orders, and technical standards—many of which are complex, scattered, or subject to interpretation.

This lack of clarity creates barriers for public understanding, regulatory oversight, and contractor accountability.

We urge the Washington State Department of Ecology to revise the AOP so that it:

- Clearly outlines all compliance demonstration methods within the permit itself
- Consolidates relevant requirements from external documents into accessible summaries
- Provides step-by-step guidance for contractors, regulators, and the public
- Includes plain-language explanations and visual aids where appropriate

A permit that requires extensive outside research to interpret is not truly protective or transparent. Ecology has the opportunity to set a precedent for clarity and accessibility in environmental permitting as it sets out to do per its website:

<https://ecology.wa.gov/regulations-permits/permits-certifications/air-quality-permits>

Response to O-1-2

For the Hanford Site AOP, Ecology does strive to consolidate the relevant portions of applicable requirements and then streamline them into the most straightforward and plain-language compliance demonstration method possible. As stated in Section 504(c) of the federal Clean Air Act (CAA), Ecology develops conditions "to assure compliance with applicable requirements of this chapter [Chapter 85 of the federal CAA], including the requirements of the applicable implementation plan."

We encourage comments on any specific language which is unclear or which might not be sufficient to assure compliance with the underlying applicable requirements. But attempting to both fully incorporate and then explain every applicable requirement, to the point where a reader wouldn't need any outside knowledge, is both outside the scope of a Title V permit and likely to lead to a much more difficult document to use (if it could even be accomplished). In many cases, such as federal regulations, developing the guidance requested would likely be inappropriate as it should be EPA to explain and clarify when their regulations are unclear.

Comment O-1-3

Increase Specificity for Air Emission Sampling Methods: There are often multiple categories listed of methods such as OSHA, NIOSH or EPA but the AOP lacks the specifics necessary to know how to demonstrate compliance. For example:

- What OSHA method for what hazardous air pollutant?
- How long of a sample or what is the minimum volume?
- Is it allowed to switch from one method to another at will?
- How can accurate trending occur with the random/inconsistent use of sample methods?
- What studies have been done to show that the various methods are equivalent?
- What is the protocol for requesting EPA administrator approval of changes to sampling methodology? Has the EPA administrator delegated this authority to Ecology staff?

Response to O-1-3

Please see the EPA response to Claim 1 of Title V Petition No. X-2019-8, which is available in the Title V Petition Database (<https://www.epa.gov/title-v-operating-permits/title-v-petition-database>) as "2020 Order Denying in a Petition for Object to Title V Operating Permit for Hanford (pdf)."

EPA's response explains why they do not delegate authority for, or approve, monitoring methodology for limits and standards which Ecology establishes under our New Source Review (NSR) program. This is especially true when those limits and standards are set for toxic air pollutants (TAPs) under Chapter 173-460 WAC, which is generally the case when non-EPA sampling methods are explicitly allowed in an approval order. EPA has no authority over Washington's TAP program, has not included it in our State Implementation Plan, and does not consider requirements related to TAPs to be applicable for Title V (which is why they are clearly marked as state only in the Hanford Site AOP).

Ecology integrates NSR requirements into the AOP as accurately as possible, while still trying to meet the standards for clarity and plain language discussed in our response to Comment O-1-2 above. Details about methods, sampling time and volume, and other parameters will depend upon the specific approval order. In many cases, Ecology has allowed the Department of Energy to develop their own Sampling and Analysis Plan for TAPs because of the unique hazards and challenges presented by the tank farms combined with the fact that EPA may not have an appropriate formal method in 40 C.F.R. Part 60, Appendices A-1 through A-8.

Emissions trending is not a typical requirement for a specific source under the Washington or federal CAAs and the Hanford Site has no applicable requirements which require emissions trending. Limits and standards are based upon fixed values and specific results are either in or out of compliance. Hanford Site air emissions must be reported annually for the WAC 173-400-103 emission inventory, which is identified as an applicable requirement in Standard Terms and General Conditions Section 5.9. The Hanford Site generally uses the same methods for estimating emissions year after year, so this data should be reasonably consistent for regional planning purposes and could be reviewed for trending if there were a need to do so. But the purpose of the Title V AOP is to identify and ensure compliance with applicable requirements, not create additional compliance obligations.

For equivalency of methods, Ecology has the authority to determine whether the methods employed are appropriate to demonstrate compliance with NSR limits we have set. We can also request additional testing at any time under WAC 173-400-105(4). We have not requested specific studies to compare methods, but if there were a concern about accuracy of monitoring results the appropriate compliance tools do exist to investigate equivalency.

Comment O-1-4

Increase Specificity for Sampling Frequency when Methods are Specified: Regarding sampling frequency, in many units a specific sampling method is stated, yet details regarding sampling frequency are not available. At times the AOP seems to confuse recordkeeping with sampling. For example:

- Test Method: EPA Method 7A of 40 CFR 60, Appendix A.
- Test Frequency: If Ecology requires under WAC 173-400-105(4)
 - o Have these units ever been sampled with the referenced method?
 - o Did they pass?
 - o How do the requirements justify no routine sample frequency?

Response to O-1-4

This comment appears to be specifically referencing AOP conditions for DPs 1.4.2, 1.4.7, 1.4.8, 1.4.16, and 1.4.17. These DPs integrate applicable requirements from Approval Order 97NM-138, including Amendment 1, for boilers which were present or soon to be installed at the Hanford Site in 1997 and Approval Order NWP-96-1 for two emergency engines which were added in approximately 1996. These are the oldest active approval orders for the Hanford Site and they were developed under a significantly different NSR process. They did not include a

Technical Support Document, Statement of Basis, or similar document which established the justification for their testing requirements.

In the case of the boilers authorized by 97NM-138, a representative sample of five boilers was tested twice (1998 and 2003) and did pass. Subsequently, the Permittee requested to remove the requirement to retest every 5 years with Letter 05-AMRC-0291, received June 13, 2005. Ecology agreed and removed the requirement from the AOP but did not revise 97NM-138. This created a situation where the boilers were in compliance with the AOP, but not the NOC approval order. EPA then established additional testing requirements for these boilers under 40 CFR Part 63, Subpart DDDDD, which were not identified in Renewal 3 of the AOP.

To rectify this situation, Ecology has established a compliance schedule to test the boilers covered by 97NM-138 or shut them down by the end of 2027. This is now discussed in Sections 2.6 and 2.13 of Attachment 1.

For the engines authorized by NWP-96-1, Ecology and DOE were unable to locate records documenting source testing for nitrogen oxides. The approval order states:

NOx emissions from Engine E and Engine W shall not exceed 75.5 and 42 pounds per hour, respectively. Compliance shall be determined by EPA Method 7A of 40 CFR Part 60, Appendix A as of July 1, 1991 or an equivalent method approved by the department.

Normally initial source testing must be completed within 180 days of commencing operation and NWP-96-1 did not establish a schedule for regular retesting. If testing occurred, it would have been approximately 30 years ago and long past the 5-year record retention requirement for the AOP.

The initial Hanford Site AOP, issued June 20, 2001, identified that the test frequency was "not applicable" and that Calculation Model 2B had been established to demonstrate ongoing compliance with these limits. Calculation Model 2B is included in the Attachment 1 Statement of Basis, Section 3.1.2.

Calculation Model 2B compares the average fuel consumption rate calculated from Permittee records to the manufacturer's maximum fueling rate. The NOx limits themselves were established at the maximum fueling rates using an emission factor developed by the United States Environmental Protection Agency. Therefore, as long as the emission factor remains conservative for the engine it shows that real-world emissions must be less than the limit.

By all appearances, the Permittee tested these engines or provided Ecology with a satisfactory demonstration of emissions prior to issuance of the original Hanford Site AOP. Additional testing was not required, so the AOP was likely supplemented with recordkeeping designed as monitoring under WAC 173-401-615(1)(b). The reference test method was left in place because it is an applicable requirement and Ecology has a general authority to require testing at any time under WAC 173-400-105(4). To better explain this situation, Ecology has added a WAC 173-401-615(1)(b) citation to the AOP condition which requires Calculation Model 2B.

Comment O-1-5

Align Sampling Instructions with Enforceable Procedures: The draft Air Operating Permit (AOP) references sampling frequency "when visible emissions are observed." However, if no

personnel are explicitly tasked with observing emissions, and no procedures exist to ensure such observations occur, this condition cannot reliably trigger sampling. In effect, the requirement becomes unenforceable.

We urge the Washington State Department of Ecology to revise the AOP to:

- Define clear procedures for observing visible emissions, including roles, frequency, and documentation
- Ensure that sampling protocols are tied to proactive monitoring—not passive or incidental observation
- Clarify how compliance will be verified if emissions are not observed due to lack of assigned oversight
- Include contingency measures to prevent emissions from going unmonitored due to procedural gaps

Without these updates, the permit risks creating a loophole where emissions may go unsampled simply because no one is required to look. This undermines both environmental protection and public accountability.

Impossible to Judge the Effectiveness of the Permit Without Specifics: Without the sampling methods and sampling frequency specified in the Air Operating Permit, it is impossible to judge the permit's effectiveness. This applies to many different units in the AOP. Please update the AOP to specify methods and sampling frequency to increase transparency, consistency, and confidence in the permit's ability to both cite limits and clarify what is needed to demonstrate compliance with the Air Operating Permit at the Hanford site.

Response to O-1-5

There is no sampling method for opacity/visible emissions. By definition, opacity is an optical property evaluated by direct human observation (e.g., EPA Method 9 or 22) or a continuous opacity monitoring system (COMS). COMS are relatively expensive and require regular calibration and maintenance. Because of this, they are typically used at sources which produce significant amounts of particulate matter (PM), such as coal-fired power plants, where opacity can be used as a real-time monitoring surrogate for PM. PM blocks visible light, creating the opacity which can be measured or observed.

The discharge points (DPs) which have requirements triggered "when visible emissions are observed" are all non-combustion sources storing or processing dangerous waste at the Hanford Site. These are DPs 1.4.14 (container storage at the Central Waste Complex), 1.4.19 (Liquid Effluent Retention Facility/Effluent Treatment Facility), 1.4.20 (container storage at T Plant), 1.4.23 (the Pretreatment, High Level Waste, and Low Activity Waste portions of the Waste Treatment and Immobilization Plant), 1.4.26 (Single-Shell Tank exhausters), 1.4.32 (Double-Shell Tank exhausters), and 1.4.80 (the Waste Treatment and Immobilization Plant Effluent Management Facility).

These sources are not expected to have human-quantifiable opacity because they do not produce enough PM while operating normally. The hypothetical scenarios where opacity would

be present would be a mechanical failure (e.g., an overheating fan bearing causing a rubber seal to smolder), an unexpected chemical reaction, or a fire. The latter two are best addressed and prevented by the Hanford Site dangerous waste permit, which has much stronger authority under WAC 173-303-395.

There is the possibility of opacity being produced by a mechanical failure, which is why the approval orders for DPs 1.4.13, 1.4.19, 1.4.20, 1.4.23, 1.4.26, 1.4.32, and 1.4.80 have identified it as a trigger to investigate and likely initiate corrective action. These are applicable requirements which must be identified in the AOP. But the applicable requirements very specifically did not establish a schedule for checking opacity or any of the other additional requirements requested by this comment.

Ecology does have authority to add monitoring in the AOP, where it is not specified in the applicable requirement, under WAC 173-401-615(1)(b). But this authority identifies that "recordkeeping designed to serve as monitoring" may already be sufficient. AOP Attachment 1, Section 2.1, Tier 3, identifies that the primary compliance demonstration for visible emissions from these emission units is conducting maintenance in accordance with the Radioactive Air Emissions License or manufacturer recommendations. This is backed up with required maintenance recordkeeping being identified in the AOP Attachment 1, Section 1.4, conditions which point down to Tier 3.

Ecology has not seen evidence of opacity or equipment failure, due to lack of maintenance, during inspections and record reviews for these DPs. Based upon this, it appears that the underlying applicable requirements have established sufficient recordkeeping designed to serve as monitoring and it is not necessary to supplement these requirements under WAC 173-401-615(1)(b).

Comment O-1-6

Incorporate Requirements Instead of Referencing old/outdated Notice of Construction: The permit renewal should incorporate the actual requirements instead of referencing old notice of construction (NOC), some of which are over 20 years old and no longer reflect current regulations. Please update the AOP to incorporate the requirements directly.

Response to O-1-6

The referenced NOC approval orders are applicable requirements which must be incorporated into the AOP. Without them, facilities such as tank farms would have no non-radioactive applicable requirements beyond general standards such as WAC 173-400-040. There are no other requirements to incorporate directly.

Stationary equipment at the Hanford Site, other than engines and boilers, is generally not subject to non-radioactive categorical standards. This is due to some combination of being too unique to have been addressed by EPA, not meeting applicability thresholds, meeting an exemption, or construction before applicability dates. Categorical air regulations are very specific in their applicability, without the equivalent of the WAC 173-303-680 "miscellaneous unit" which exists in dangerous waste regulations.

It is accurate that NOC approval orders are written to the regulations and permitting standards at the time of issuance. This is an intentional design of the air permitting regulations developed from both the federal and Washington CAAs. Air permitting is structured to authorize projects through a New Source Review (NSR) process when they exceed permitting thresholds. The issued permits or approval orders do not expire unless they are specifically rescinded/revoked. They do not need to be revised, renewed, or otherwise updated unless there is a subsequent project which triggers NSR or the permittee requests a change to existing conditions.

In part to address the fact that facilities might have requirements spread across many regulations and permits, EPA later developed the Title V AOP program to collect all applicable requirements for more-polluting sources into one permit which does need to be periodically reviewed and renewed. However, as EPA stated in their January 9, 2024, proposed rulemaking "Clarifying the Scope of "Applicable Requirements" Under State Operating Permit Programs and the Federal Operating Permit program" (EPA-HQ-OAR-2023-0401; FRL-9118-01-OAR):

Beyond title V's consolidation and compliance assurance functions, title V generally does not impose new pollution control requirements on sources or provide a vehicle to modify such requirements established under other CAA programs. Thus, the EPA's regulations expressly provide: "All sources subject to these regulations shall have a permit to operate that assures compliance by the source with all applicable requirements. While title V does not impose substantive new requirements, it does require that . . . certain procedural measures be adopted especially with respect to compliance." 40 CFR 70.1(b) (emphasis added). For additional information about the purpose and function of title V, see section IV.E.2. of this preamble.

In summary, the title V operating permit program is a vehicle for compiling air quality control requirements from other CAA programs and for providing requirements necessary to assure compliance with such requirements, but not for creating or changing applicable requirements. Put simply, title V is a catch-all, not a cure-all. The discussion throughout the remainder of this preamble builds upon these longstanding general principles, which the EPA does not propose to change through this rulemaking.

Comment O-1-7

Address Synergistic Effects of Radiation and Chemical Carcinogens: We echo the concern raised by longtime Hanford health advocate, Bill Green: the Air Operating Permit (AOP) treats radioactive and non-radioactive carcinogens as separate regulatory categories, without accounting for their additive or synergistic health impacts.

This siloed approach fails to reflect current scientific understanding. Studies have shown that combined exposure to ionizing radiation and chemical carcinogens can result in amplified biological effects—posing greater risks to workers, nearby communities, and ecosystems than either exposure alone.

We urge the Washington State Department of Ecology to revise the AOP to:

- Incorporate cumulative risk assessments that account for synergistic interactions
- Require integrated monitoring and reporting of co-occurring contaminants

- Consult with toxicologists and radiation health experts to inform permit conditions
- Prioritize precautionary measures where synergistic risks are plausible but not fully quantified

Hanford's legacy demands a permitting framework that reflects the complexity of its hazards. Addressing synergistic effects is not just scientifically sound—it's ethically necessary.

Response to O-1-7

Ecology has no regulatory authority to do what is requested under the federal or Washington CAAs. It would especially be inappropriate to do so under Title V authority. Please see responses to comments I-2-1 and O-1-6 above for more information.

Comment O-1-8

Create a Working Group to Address Issues and Suggest Improvements to Hanford's Air Operating Permit: There is concern that a lack of awareness, training, and expertise on air operating permits is partially to blame for the lack of specificity and problems with the Air Operating Permit. One way to address this is to create a working group with expertise to review and suggest improvements to Hanford's AOP, to ensure that Hanford employees and the public are able to understand the permit, know what the regulations are, and know how to demonstrate compliance with the permit.

Response to O-1-8

Ecology encourages comments on how applicable requirements are incorporated into the Hanford Site AOP, but the proposed working group does not appear to be compatible with the Title V permitting processes established in Chapter 173-401 WAC.

Comment O-1-9

Ensure Accuracy and Consistency of Citations: We echo Bill Green's longstanding concern regarding citation accuracy in the Air Operating Permit (AOP). In particular, the outdated reference to RCW 70.92—rather than the correct RCW 70.98—was flagged as early as 2016. Ecology acknowledged the need for correction, yet the error persists in this renewal.

Accurate citations are essential for regulatory clarity, legal enforceability, and public trust. We urge Ecology to:

- Conduct a thorough review of all statutory and regulatory citations in the AOP
- Correct outdated or incorrect references, including RCW 70.92 → RCW 70.98
- Ensure consistency across permit sections and supporting documents
- Consider engaging the Hanford working group or other stakeholders to assist in this review

This is a straightforward fix that would significantly improve the permit's usability and credibility.

Response to O-1-9

Ecology has corrected the noted citation in the Background section of the Statement of Basis for the Standard Terms and General Conditions, including the recodification of RCW 70 to 70A.

Comment O-1-10

Clarify EPA Guidance References: The Air Operating Permit references “guidance issued by the United States Environmental Protection Agency” but fails to specify which documents are being used. Without titles, publication dates, or document numbers, it’s unclear what standards are informing permit conditions. We urge Ecology to clearly identify each EPA guidance document referenced, explain its relevance to the permit, and ensure that all cited materials are current and publicly accessible. This clarity is essential for transparency, enforceability, and public understanding.

Response to O-1-10

Ecology has added additional information regarding EPA guidance to Hanford Site AOP Statements, particularly for the source aggregation discussion in Section 2.0 of the Statement for the Standard Terms and General Conditions. We encourage comments on Statement language which is incomplete or unclear. We will continue to update these areas, including adding references to specific guidance when appropriate, if Statement language does not meet the WAC 173-401-700(8) standard that it "sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions)."

It is not possible to specifically address all guidance for Title V, NSR, and categorical regulations which may have been considered for the Hanford Site. At the time of drafting this response, EPA has 323 entries in their Title V Operating Permit Policy and Guidance Document Index (<https://www.epa.gov/title-v-operating-permits/title-v-operating-permit-policy-and-guidance-document-index>), 744 entries in their New Source Review Policy and Guidance Document Index (<https://www.epa.gov/nsr/new-source-review-policy-and-guidance-document-index>), 3,825 entries in their Applicability Determination Index (<https://cfpub.epa.gov/adi/index.cfm?CFID=21004939&CFTOKEN=aff2fa3150910ab6-761024AC-FAD7-6989-2B6D2F6DC046A98D&requesttimeout=180>), and likely thousands of additional reference documents related to specific categorical regulations.

Furthermore, there are aspects of current EPA guidance which have not been updated to address court decisions and changes in EPA policy established by memorandums, rulemaking, and other methods. Specific permitting decisions may have been based upon contemporary EPA guidance which was subsequently changed or rescinded in a way that did not trigger reconsideration of past decisions. These factors would potentially require Ecology to dedicate large portions of the Hanford Site AOP just to explaining the federal guidance itself, beyond what EPA itself has been able to produce, which would be well outside the scope of developing a Title V AOP for the Hanford Site.

Attachment 2: Comments and Responses for United States Department of Energy - Hanford Field Office

The comments and responses for Energy's submittal.

#	Comment	Basis	Recommendation	Ecology Response
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).	Comment accepted.
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> .	If there is sufficient time to do so, changes such as this are best addressed as a revision to RAEL FF-01 so that they are directly included in Attachment 2 of the Hanford Site AOP when the RAEL is incorporated. If necessary, Ecology can make revisions to the incorporated version of RAEL FF-01 through Attachment 2, Addendum A. But that creates inconsistency and the potential need to later revise Addendum A to remove this text when it becomes redundant or inappropriate later. For the second public notice draft of Renewal 4 of the Hanford Site AOP (AOP.2026.1D), Ecology is incorporating the most recent complete version of RAEL FF-01 as Attachment 2. We are assuming that any appropriate changes have already been made by Health. If this change to the requirements of RAEL FF-01 is still desired, please resubmit the

#	Comment	Basis	Recommendation	Ecology Response
				comment and Ecology will consult with Health to determine if it is appropriate.
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>"	Ecology has added new Sections 2.9, 2.10, and 2.11 to Attachment 1 which identify how the Hanford Site complies with federal engine regulations. Equivalent conditions which were previously included in Section 1.4 for each engine discharge point (DP) have been converted to references to Section 2.9, 2.10, and/or 2.11, as appropriate. Section 2.9 establishes the requirements for using the oil analysis program developed by EPA under NESHAP Subpart ZZZZ. Sections 2.10 and 2.11 for NSPS Subpart IIII and JJJJ engines identify that Ecology will consider a determination that oil and oil filter replacement is not needed to be equivalent to replacement of these consumables for manufacturer recommendations.

#	Comment	Basis	Recommendation	Ecology Response
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	40CFR63.6625(i)	Revise the following language: Condition 1: <u>Operate and maintain the engine in</u> accordance with Manufacturer's recommendations or instructions OR follow the requirements below: (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, Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Please see response to DOE Comment #3 regarding establishment of a new Attachment 1, Section 2.9. Ecology was not certain if DOE Comment #4 was based upon the assumption that it was not necessary to meet the most strict maintenance requirement or if it was identifying potentially confusing grammar with "Follow the stricter requirements of the following." Engines at the Hanford Site which are subject to NESHAP Subpart ZZZZ, but not subject to NSPS Subpart IIII or JJJJ, are required to be maintained to the manufacturer's emission-related written instructions or a maintenance plan consistent with good air pollution control practices by 40 CFR 63.6625(e). They are also required to be maintained to the maintenance intervals specified in Table 2c by 40 CFR 63.6602. These requirements are separate and must both be satisfied, even if a manufacturer recommends a longer maintenance interval than is required by Table 2c. Updated conditions in Section 2.9 now identify that, by default, Ecology expects DOE to begin with manufacturer maintenance recommendations and then increase maintenance frequency for

#	Comment	Basis	Recommendation	Ecology Response
	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.			specific tasks, if needed, for Table 2c. If this is done, Ecology will generally assume the resulting maintenance plan is in accordance with good air pollution control practices. If there are circumstances for a specific engine which do not fit the default process, additional information will be included in the appropriate Section 1.4 DP to modify the Section 2.9 requirements. An example might be if no manufacturer maintenance recommendations could be found for an engine. In that case, a more complete maintenance plan consistent with good air pollution control practices might be developed based upon experience with that engine. Ecology could potentially acknowledge this in the Section 1.4 DP with the reference to Section 2.9.
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	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.	Ecology has updated DP 1.4.118 to address applicable requirements from Approval Order DE24NWP-001.

#	Comment	Basis	Recommendation	Ecology Response
	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.			
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.	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> .	If there is sufficient time to do so, changes such as this are best addressed as a revision to RAEL FF-01 so that they are directly included in Attachment 2 of the Hanford Site AOP when the RAEL is incorporated. If necessary, Ecology can make revisions to the incorporated version of RAEL FF-01 through Attachment 2, Addendum A. But that creates inconsistency and the potential need to later revise Addendum A to remove this text when it becomes redundant or inappropriate later. For the second public notice draft of Renewal 4 of the Hanford Site AOP (AOP.2026.1D), Ecology is incorporating the most recent complete version of RAEL FF-01 as Attachment 2. We are assuming that any appropriate changes have already been made by Health. If this change to the requirements of RAEL FF-01 is still desired, please resubmit the

#	Comment	Basis	Recommendation	Ecology Response
	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."			comment and Ecology will consult with Health to determine if it is appropriate.
7	ATTACHMENT 2: Department of Health License IDF EU: 1464, Condition 2 A summary of IDF tasks is provided below: ·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	IDF's RCRA permit allows for storage of waste on Dangerous Waste Management Units other than the "waste storage pad".	5th bullet should be changed to read: ·Waste storage on the waste storage pad <u>and waste treatment pad.</u>	If there is sufficient time to do so, changes such as this are best addressed as a revision to RAEL FF-01 so that they are directly included in Attachment 2 of the Hanford Site AOP when the RAEL is incorporated. If necessary, Ecology can make revisions to the incorporated version of RAEL FF-01 through Attachment 2, Addendum A. But that creates inconsistency and the potential need to later revise Addendum A to remove this text when it becomes redundant or inappropriate later. For the second public notice draft of Renewal 4 of the Hanford Site AOP (AOP.2026.1D), Ecology is incorporating the most recent complete version of RAEL FF-01 as Attachment 2. We are assuming that any appropriate changes have already been made by Health. If this change to the requirements of RAEL FF-01 is still desired, please resubmit the

#	Comment	Basis	Recommendation	Ecology Response
	Storage of containerized waste prior to treatment or disposal will also be located on the waste treatment pad.			comment and Ecology will consult with Health to determine if it is appropriate.
8	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."	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 " <u>observe visible emissions for not greater than 6-minute observation.</u> "	Ecology has updated Section 2.1 to require 3 observations of 6-minutes each when EPA Method 9 is required and a full continuous hour of observations when Ecology Method 9A is required. This is more stringent and consistent for WAC 173-400-040(2). As noted in this comment, there is no direct regulatory driver for 18 minutes of continuous observation. It was an attempt to bridge the gap between these two methods and not require a full hour of observation when demonstrating compliance with WAC 173-400-040(2). Ecology determined that this is inappropriate and DOE must follow Ecology Method 9A, as written, when it is required as a compliance demonstration for WAC 173-400-040(2).

#	Comment	Basis	Recommendation	Ecology Response
	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. 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.			For opacity readings connected with WAC 173-400-040(2), including the cases where they are required by an approval order, Ecology Method 9A specifies a 1-hour observation period to demonstrate that emissions have not exceeded 6 minutes of opacity exceeding 20% in this period. But there is no requirement in WAC 173-400-040(2) to conduct observations at any set frequency. WAC 173-401-615(1)(b) requires that sufficient monitoring be established in an AOP when it is not specified in the underlying applicable requirement. Ecology developed Attachment 1, Section 2.1, to create a reasonably uniform program of monitoring for opacity across the Hanford Site. It addresses applicable requirements which do specify monitoring and those which had monitoring gap filled. Ecology was considering a modified version of Ecology method 9A with an 18-minute observation period to be sufficient as gap filling for WAC 173-400-040(2). However, Ecology agrees that this inconsistency with the reference method and therefore is not appropriate.

#	Comment	Basis	Recommendation	Ecology Response
9	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,.... Remove CHPRC and update with Central Plateau Cleanup Company (CPCCo)	Update to the current Hanford contractor	Update to the current Hanford contractor Central Plateau Cleanup Company (CPCCo)	If there is sufficient time to do so, changes such as this are best addressed as a revision to RAEL FF-01 so that they are directly included in Attachment 2 of the Hanford Site AOP when the RAEL is incorporated. If necessary, Ecology can make revisions to the incorporated version of RAEL FF-01 through Attachment 2, Addendum A. But that creates inconsistency and the potential need to later revise Addendum A to remove this text when it becomes redundant or inappropriate later. For the second public notice draft of Renewal 4 of the Hanford Site AOP (AOP.2026.1D), Ecology is incorporating the most recent complete version of RAEL FF-01 as Attachment 2. We are assuming that any appropriate changes have already been made by Health. If this change to the requirements of RAEL FF-01 is still desired, please resubmit the comment and Ecology will consult with Health to determine if it is appropriate.

#	Comment	Basis	Recommendation	Ecology Response
10	STANDARD TERMS AND GENERAL CONDITIONS 5.5 Submittals 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.	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.	No changes were made for this comment. Ecology was uncertain whether it was directed towards routine reports which are applicable requirements incorporated into the AOP (e.g., test reports for Attachment 1, DP 1.4.25, Condition 8) or reports that are required by Title V itself (semiannual reports and annual compliance certifications addressed by STGC Sections 5.6 and 5.10). In either case, it is not necessary to submit separate reports for different versions of the AOP. For applicable requirements incorporated into the AOP, there would be no obligation to submit a second report because the AOP is only identifying the requirement established by an approval order, RAEL, regulation, or other non-Title V origin. If the report for DP 1.4.25, Condition 8, is satisfactory for Approval Order DE05NWP-001, Revision 2, under Renewal 3 it would continue to be sufficient under Renewal 4. For reporting required by Title V, the reporting periods for semiannual reports

#	Comment	Basis	Recommendation	Ecology Response
				and compliance certifications are synced to the calendar year. But the reporting requirement itself falls to the next half or full calendar year period. This is addressed in STGC 5.6.1 and 5.10.1. There is no reason to submit entirely separate reports for AOP Renewal 3 and Renewal 4 to cover the time periods where both effective. Additionally, WAC 173-401-630(5)(c)(iv) requires that the annual compliance certification identifies the methods used to determine compliance "currently and over the reporting period." If DOE were to use different methods to determine compliance with requirements for the first portion of a calendar year, due to the transition from Renewal 3 to Renewal 4, this must be identified in the annual compliance certification. This can be done by providing date ranges for requirements and methods. But specifically excluding AOP Renewal 3 content in a period where it was effective would appear to authorize a potential violation of WAC 173-401-630(5)(c)(iv).
11	ATTACHMENT 1: Ecology Permits and Regulations Page 13 Line 1 "ABBREVIATONS" is	Editorial	Correct typo.	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
	misspelled.			
12	ATTACHMENT 1: Ecology Permits and Regulations Page 13 Lines 25-27 Descriptions are merged.	Editorial	Correct.	Comment accepted.
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.	Ecology has updated this citation, moving it up to the abbreviation table at the start of Attachment 1 to ensure consistency throughout the document when test methods are cited.
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)	Comment accepted.
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.	Comment accepted.
16	ATTACHMENT 1: Ecology Permits and Regulations 1.4.19 DP: Liquid Effluent Retention Facility Basins 41-44 & P-2025 Effluent	Editorial	Line 16 should be indented to line up with the rest of the condition.	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
	Treatment Facility Page 47 Line 16 Formatting issue.			
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.	In the first public notice draft of Renewal 4 of the Hanford Site AOP (AOP.2025.1D), the reference to Approval Order DE07NWP-003, Revision 2, Approval Condition 2.b was intended to establish the definitions for the two waste streams (EMF and non-EMF wastes) which had specific limits of 10.8 and 59.3 million gallons respectively. Adding the full definitions of these waste streams would have significantly increased the size and complexity of the AOP condition for limited compliance and enforcement utility. The intent was not to reference AOP Attachment 1, DP 1.4.19, Condition 2. AOP conditions have a different naming format and Condition 2 identifies exhauster operational limits, not waste processing limits. This comment highlighted that there is the potential for confusion between AOP conditions and citations to approval order conditions. As a standard practice, Ecology will include the approval order name in the text when a specific Approval Condition is cited. This was,

#	Comment	Basis	Recommendation	Ecology Response
				unfortunately, not done when AOP Attachment 1, DP 1.4.19, Condition 3 was updated for the new limit structure in Approval Order DE07NWP-003, Revision 3. Ecology has added a review for these incomplete citations to planned updates for the AOP issuance to follow Renewal 4. For Renewal 4 itself, any incomplete "Approval Condition" reference should be assumed to refer to the specific approval order cited in the "Requirement Source" citation immediately above that AOP condition.
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	Comment accepted.
19	ATTACHMENT 1: Ecology Permits and Regulations 1.4.25 DP: Ventilation Systems for 241-AN Tank Farm	Editorial	Change to read: Results of baseline emission assessments conducted shall	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
	Page 76 Line 20 Suggest adding "baseline" to better line up with Approval Order DE05NWP-001, Rev. 2, Condition 2.5 Reporting.		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.	Comment accepted.
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	Ecology has updated AOP conditions related to opacity and visual emission determinations, including removal of the word quantification. This was added to help distinguish between EPA Method 22, which can only determine the presence of visible emissions, and EPA Method 9, which determines an average opacity value. EPA refers to them both as determinations, which created a concern about confusion where they are both addressed in Attachment 1, Section 2.1. Instead of using quantification, Ecology has increased the frequency in which the specific method name is used to help distinguish requirements.
22	ATTACHMENT 1: Ecology Permits and Regulations This may be a global	Editorial	Add "-" between "60" and "months".	Where the AOP states records must be retained "for a minimum of 60 months" this term is not being used as a

#	Comment	Basis	Recommendation	Ecology Response
	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			compound adjective modifying a noun. A hyphen would be correct if they were addressing a 60-month period, but these conditions were not structured in that format.
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	Comment accepted.
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	This change would not be appropriate. The referenced line identified periodic monitoring necessary for the dimethyl mercury limit specified in DE11NWP-001, Rev. 4. Section/Approval Condition 1.1 of DE11NWP-001, Rev. 4, lists numerical emission limits established by that approval order, including the limit for dimethyl mercury. It also addresses limits for opacity, VOC, all TAPs listed in the NOC application, ammonia, and n-nitrosodimethylamine. If Ecology converted the reference from Section/Approval Condition 3.5 to 1.1, it would essentially say that the monitoring

#	Comment	Basis	Recommendation	Ecology Response
				for the dimethyl mercury limit is the limits for opacity, VOC, all TAPs listed in the NOC application, ammonia, dimethyl mercury, and n-nitrosodimethylamine. That would be circular for the dimethyl mercury limit itself and nonsensical for the numerical limits on the other pollutants. Section/Approval Condition 3.5 of DE11NWP-001, Rev. 4, is "Ammonia Monitoring as Indicator Compound for TAPs During Solids Mixing, Disturbing Bulk Tank Solids, Removal of Enough Supernatant to Potentially Create a Gas Release Event, or Waste Feed Delivery Operations to the WTP." This is the actual monitoring required to demonstrate compliance with TAP limits, such as the one for dimethyl mercury.
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	Comment accepted.
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".	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
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	See response to DOE Comment #21 regarding changes to requirements for opacity and visual emission determinations.
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	See response to DOE Comment #21 regarding changes to requirements for opacity and visual emission determinations.
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,	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
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	Comment accepted.
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	Comment accepted.
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	Must is more consistent with the underlying approval order and has been corrected. Ecology has also updated the entire AOP to use "must" over "shall" unless directly quoting text (where "shall" has been left) or describing an action which Ecology plans to take upon a specific trigger (where "will" is used instead). In many cases this is inconsistent with the term used in the underlying approval order or regulation, but it is more consistent with current Ecology guidance on plain language. Ecology does not have any guidance on

#	Comment	Basis	Recommendation	Ecology Response
				which term to use in an AOP, but internal guidance for minor NSR states that we should use "must" instead of "shall." It also acknowledges that "shall" has often been used over the years. For the Hanford Site AOP, Ecology has often taken language direct from approval orders and regulations which do use shall, leading to an inconsistent mix of terms. Switching these to must, or other appropriate phrasing, creates a more consistent AOP.
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,	Comment accepted.
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.	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
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	Comment accepted.
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.	Comment accepted.
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;	See response to DOE Comment #21 regarding changes to requirements for opacity and visual emission determinations.
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	Editorial	Change to read: (C) Cease operations and contact Ecology to discuss options	The proposed language would read "Should visible emissions be observed, compliance must be met by:...Cease operations and contact Ecology to discuss options to re-start operations." Leaving this as ceasing is more correct,

#	Comment	Basis	Recommendation	Ecology Response
	DE23NWP-001, suggest editorial comments.			grammatically, within the condition structure of the AOP even if the underlying approval order says cease. This is a case where streamlining in the AOP leads to slightly different language than the underlying applicable requirement.
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	See response to DOE Comment #21 regarding changes to requirements for opacity and visual emission determinations.
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.	See response to DOE Comment #21 regarding changes to requirements for opacity and visual emission determinations.
41	ATTACHMENT 1: Ecology Permits and Regulations 1.4.120 DP: Tank-Side Cesium Removal Heating, Ventilation, and Air Conditioning Generator Compression	Editorial	Change “N/A” to “E-TSCRHVAC-001”.	Comment accepted.

#	Comment	Basis	Recommendation	Ecology Response
	Ignition Engine Page 258 Line 3 Suggest adding a unique Permittee AEI ID.			
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.	Comment accepted.
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.	See response to DOE Comment #3 regarding establishment of new Attachment 1, Sections 2.9, 2.10, and 2.11. Ecology was including DPF language with an "if" statement for all engines subject to NSPS Subpart IIII to help standardize conditions related to compliance with federal standards. However, this approach was potentially confusing when a stakeholder reviews a specific discharge point that covered engines without a DPF. Instead, Ecology has moved the standard conditions for NSPS Subpart IIII to the new Section 2.10. This section is more clearly generic across all engines that fit

#	Comment	Basis	Recommendation	Ecology Response
				this category. Information specific to an engine, such as the noted lack of a DPF for DP 1.4.79, can be provided in Section 1.4. This should make it easier for an inspector or member of the public to review the equipment covered under a specific DP while still providing a concise and straightforward explanation of what DOE must do to comply with federal standards.
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.	Ecology has removed the calculation models listed in Section 3.1 of the Statement for Attachment 1 which are no longer in use. This includes Model 7B, which was previously in Section 3.1.7. With deletion of the referenced text, there is no need to specifically remove the reference to AERSCREEN or address the agreed-upon ambient air boundary.
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.	Comment accepted.
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-	EPA Alert	Consider adding note about the use of AP-42 factors.	Ecology has added a discussion of the EPA hierarchy of methods to determine source-specific emissions, including AP-42 emission factors, in Section 3.1 of the Statement for Attachment 1. This includes a reference to 2020 Enforcement Alert.

#	Comment	Basis	Recommendation	Ecology Response
	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.			
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.	Ecology considered adding additional discussion of emission factors, but the intent of Section 3.1 is to address calculation models that were developed for specific emission units addressed in Attachment 1. These models do not utilize the additional sources of emission factors listed in this comment, so additional discussion would not help explain the requirements which have been incorporated into Attachment 1.

Appendix A. Copies of All Public Notices

Public notices for this comment period:

- Focus sheet
- Notices sent to the Hanford-Info email list
- Notice posted on Washington Department of Ecology – Hanford’s Facebook page

Hanford Site Air Operating Permit Renewal 4 Public Comment Period



Figure 1. Columbia River looking at the Hanford Site.

At a glance

Comments accepted July 28 12:00am – Aug 29, 2025 11:59pm

The Hanford site Air Operating Permit (AOP) protects the people and air resources of Washington State. The draft Renewal 4 contains the changes and updates that have occurred since the issuance of Renewal 3.

Public comment invited

The Washington State Department of Ecology (Ecology) is proposing to issue Renewal 4 of the AOP for the Hanford Site, No. 00-05-006, addressing applicable requirements for Title V of the federal Clean Air Act (FCAA). This renewal and comment period cover all stationary sources of air pollutants with applicable requirements at the Hanford Site.

The permittee is:

U.S. Department of Energy (Energy)
Hanford Field Office
P.O. Box 550
Richland, WA 99352

Background

The Hanford Site occupies 586 square miles in southeastern Washington State. The site produced plutonium for the nation's defense program from 1943 to the late 1980s. Today, waste management and environmental cleanup are the primary missions at Hanford.

Overview & Changes

This permit renewal would incorporate all changes in applicable requirements for the Hanford Site since issuance of Renewal 3. These changes include:

- ## About the Permit

In 1991, the Washington State Legislature updated the Washington Clean Air Act (now recodified as RCW 70A.15) to make it consistent with these changes. In 1993, Ecology developed Washington's AOP regulations (WAC 173-401) to comply with federal regulations. The EPA granted Washington State the authority to implement the AOP regulations in November 1994. The Hanford Site AOP was first issued in June 2001.

Three agencies administer the Hanford Site AOP. Ecology regulates the nonradioactive criteria and toxic air emissions. Health regulates radioactive air emissions. The Benton Clean Air Agency regulates outdoor burning.

WAC 173-401-610 limits an AOP to a fixed term of five years. Renewal 3 of Hanford Site AOP expired on August 1, 2024. However, Energy submitted a complete renewal application on November 13, 2023. In accordance with WAC 173-401-620(2)(j), Renewal 3 remains in effect until Ecology issues Renewal 4 or denies the application. The Hanford Site still meets criteria which require issuance of an AOP.

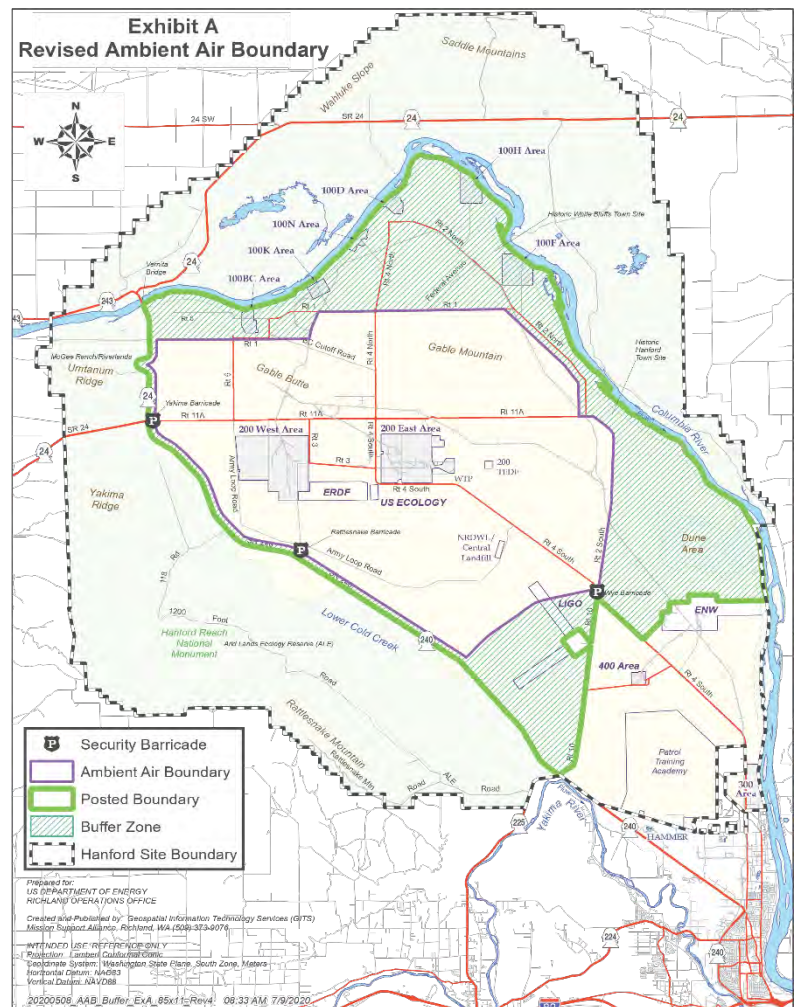


Figure 2 Current Hanford Site boundary map for air permitting.

Reviewing the Draft Permit

Ecology invites you to review and comment on the proposed Renewal 4. See the last page for comment period dates and information on how to submit comments.

Copies of the application for the proposed permit, the draft permit and statements of basis, and supporting documentation will be available during the public comment period online at Ecology's website¹. The documents will also be available electronically at the Hanford Public Information Repositories².

Ecology will consider and respond to all comments received during the public comment period. We will document our responses and issue a response to comments document when we make our final permitting decision. The proposed final AOP will then be sent to the EPA for a 45-day review prior to issuance, in accordance with WAC 173-401-700(1)(f).



Figure 3: Nuclear Waste Program office - Richland

For information on other comment periods or ways to get involved, go to ecology.wa.gov/Hanford and click "Public comment periods" on the left bar or visit [Hanford.gov](https://hanford.gov) "public involvement opportunities".

You can also follow us on social media.



@EcologyWAHanford

¹ <https://ecology.wa.gov/waste-toxics/nuclear-waste/public-involvement>

² <https://apps.ecology.wa.gov/publications/SummaryPages/2505008ML.html>



Nuclear Waste Program
3100 Port of Benton Blvd
Richland WA 99354

Hanford Site Air Operating Permit Renewal 4

July 28 – August 29, 2025



Electronic submission (preferred):

<https://nw.ecology.commentinput.com/?id=HW4Bm6StZ>

A public hearing is not scheduled, but if there is enough interest, we will consider holding one.

To request a hearing, mail or hand-deliver comments, or for more information, contact:

Daina McFadden
509-372-7950
3100 Port of Benton Blvd
Richland, WA 99354
Hanford@ecy.wa.gov

HANFORD SITE

586 square miles



To request an ADA accommodation, contact Ecology by phone at 509-372-7950 or email at Daina.McFadden@ecy.wa.gov, or visit ecology.wa.gov/Accessibility. For Relay Service or TTY call 711 or 877-833-6341.

From: [Washington Department of Ecology](#)
To: [McFadden, Daina \(ECY\)](#)
Subject: 30-day advance notice for the Hanford Air Operating Permit Renewal 4
Date: Friday, June 27, 2025 10:00:53 AM



30-day advance notice for the Hanford Air Operating Permit Renewal 4

Starting soon

Ecology will be holding a 30-day public comment period for the Hanford Air Operating Permit (AOP) Renewal 4 starting in late July. The permittee is the U.S. Department of Energy. The Hanford Site is located in southeastern Washington.

What changes are being proposed?

This renewal covers all stationary sources of air pollutants with applicable requirements at the Hanford Site and will incorporate all changes in these requirements since issuance of Renewal 3.

Public hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden

Permit Communication Specialist

✉ Hanford@ecy.wa.gov

☎ 509-372-7950

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Having trouble viewing this email? [View it as a Web page.](#)

From: [Washington Department of Ecology](#)
To: [McFadden, Daina \(ECY\)](#)
Subject: AOP comment period starts today!
Date: Monday, July 28, 2025 10:01:13 AM



DEPARTMENT OF
ECOLOGY
State of Washington



Air Operating Permit Renewal 4 public

comment period

Ecology is holding a 30-day public comment period on the proposed Renewal 4 of the Air Operating Permit (AOP) for the Hanford Site, No. 00-05-006, addressing applicable requirements for Title V of the federal Clean Air Act. The Hanford Site is in southeastern Washington and formerly produced plutonium for the nation's defense program. Today, waste management and environmental cleanup are the primary missions at Hanford. The permittee is the U.S. Department of Energy.

U.S. Department of Energy
Hanford Field Office
P.O. Box 550
Richland, WA 99352

Comment period starts: **July 28, 2025, 12:00 a.m.**

Comment period ends: **Aug. 29, 2025, 11:59 p.m.**

Proposed changes

This draft Renewal 4 incorporates all changes in applicable requirements for the Hanford Site since issuance of Renewal 3.

How to comment

The proposed permit renewal and statements of basis are available for review online at the Nuclear Waste Program's [public involvement page](#).

Electronic copies of the proposed modification are also located at the [Administrative Record](#) and [Information Repositories](#).

Please submit comments by **Aug. 29, 2025**. [Electronically](#) (preferred) or deliver to:

Daina McFadden
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd
Richland WA 99354

[Review documents](#)

Requesting additional information or a public hearing

The administrative record for this renewal is too large for website posting but is available for inspection. A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, including how to view administrative record files, contact:

Daina McFadden

Permit Communication Specialist

✉ Hanford@ecy.wa.gov

☎ 509-372-7950

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Having trouble viewing this email? [View it as a Web page.](#)

From: [Washington Department of Ecology](#)
To: [McFadden, Daina \(ECY\)](#)
Subject: AOP comment period Extended!
Date: Thursday, August 14, 2025 3:02:43 PM



Air Operating Permit Renewal 4 public comment period extended

Ecology is extending the public comment period on the draft Renewal 4 of the Hanford Site AOP by 21 days, to **September 19, 2025**. It was discovered that the notification of a complete application, which was submitted with Letter 23-ECD-0094, was not posted to the Ecology Permit Register in a timely manner for WAC 173-401-805(2)(b). Ecology has posted this notification in the August 11, 2025, update of the Permit Register and is extending the comment period to ensure sufficient time for review.

Ecology is holding a ~~30-day~~ 51-day public comment period on the proposed Renewal 4 of the Air Operating Permit (AOP) for the Hanford Site, No. 00-05-006, addressing applicable requirements for Title V of the federal Clean Air Act. The Hanford Site is in southeastern Washington and formerly produced plutonium for the nation's defense program. Today, waste management and environmental cleanup are the primary missions at Hanford. The permittee is the U.S. Department of Energy.

U.S. Department of Energy

Hanford Field Office
P.O. Box 550
Richland, WA 99352

Comment period starts: **July 28, 2025, 12:00 a.m.**

Comment period ends: ~~Aug. 29, 2025~~ **Sept 19, 2025, 11:59 p.m.**

Proposed changes

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How to comment

The proposed permit renewal and statements of basis are available for review online at the Nuclear Waste Program's [public involvement page](#).

Electronic copies of the proposed modification are also located at the [Administrative Record](#) and [Information Repositories](#).

Please submit comments by ~~Aug. 29, 2025~~ **Sept. 19, 2025**. [Electronically](#) (preferred) or deliver to:

Daina McFadden
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd
Richland WA 99354

[Review documents](#)

Requesting additional information or a public hearing

The administrative record for this renewal is too large for website posting but is available for inspection. A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, including how to view administrative record files, contact:

Daina McFadden

Permit Communication Specialist

✉ Hanford@ecy.wa.gov

☎ 509-372-7950

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Washington Department of Ecology - Hanford

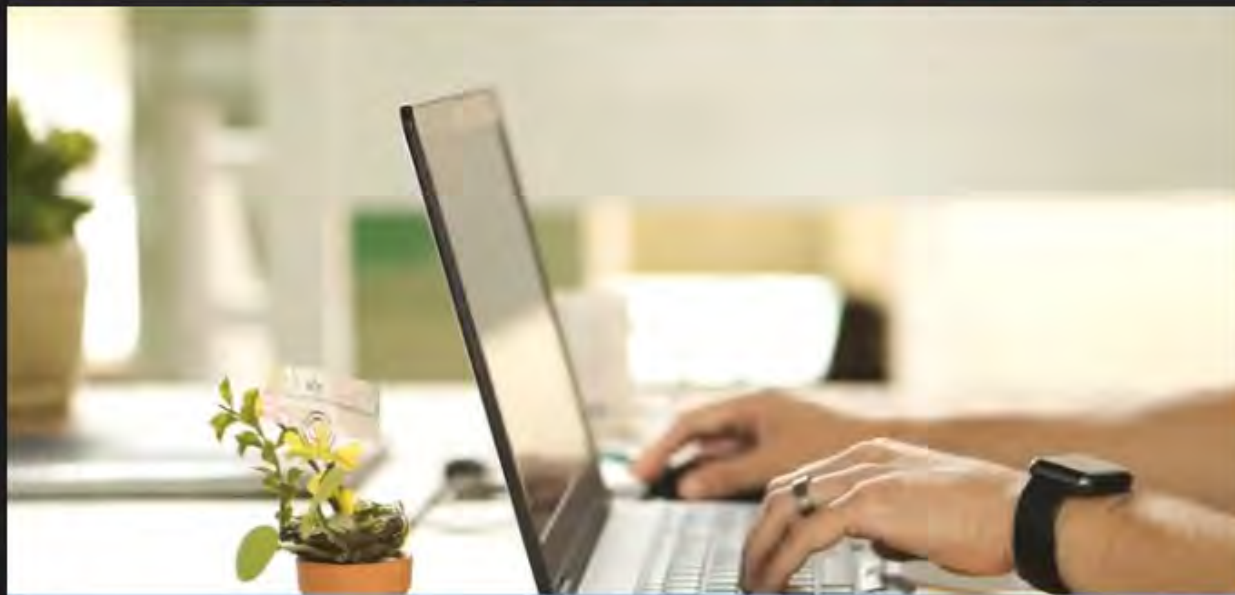
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The Air operating permit renewal 4 public comment period starts today!

Comment period ends: Aug. 29, 2025, 11:59 p.m.

Submit your comments: <https://ecology.wa.gov/.../nuclear-waste/public-involvement>



YOUR VOICE MATTERS

*Public comment
period now open!*



DEPARTMENT OF
ECOLOGY
State of Washington



Air Operating Permit Renewal 4

July 28 12:00 a.m. to Aug. 29, 2025, 11:59 p.m.

Ecology is holding a 30-day public comment period on the proposed Renewal 4 of the Air Operating Permit (AOP) for the Hanford Site, No. 00-05-006, addressing applicable requirements for Title V of the federal Clean Air Act. The Hanford Site is in southeastern Washington and formerly produced plutonium for the nation's defense program. Today, waste management and environmental cleanup are the primary missions at Hanford. The permittee is the U.S. Department of Energy.

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Please submit comments by **Aug. 29, 2025**. [Electronically](#) (preferred) or mail or hand-deliver to:

Daina McFadden
Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd
Richland WA 99354

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Daina McFadden
Hanford@ecy.wa.gov
509-372-7950

Documents

Transmittal Letter	Focus Sheet
Master Change Control Log	Attachment 2: Radioactive Air Emissions License (FF-01)
Standard Terms and General Conditions	Attachment 2, Addendum A
Statement of Basis for Standard Terms and General Conditions	Statement of Basis for Health License
Attachment 1: Ecology Permits and Regulations	Attachment 3: Benton Clean Air Agency Regulations
Statement of Basis for Ecology Permits and Regulations	Statement of Basis for Benton Clean Air Agency Regulations