HANFORD SITE AIR OPERATING PERMIT NO. 00-05-006
STANDARD TERMS AND GENERAL CONDITIONS
STATEMENT OF BASIS

CHANGE CONTROL LOG

Change Control Logs ensure that changes to this permit are performed in a methodical, controlled, coordinated, and transparent manner. Each permit file will have its own change control log with a modification history table. The "**Modification Number**" represents Ecology's method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the permit.

Modification History Table

Modification Date	Modification Number

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ATTENTION: The Hanford Site Air Operating Permit is broken into multiple documents and attachments/sections. The Statement of Basis for the Standard Terms and General Conditions is not enforceable.

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LIST OF ABBREVIATIONS FOR THE STATEMENT OF BASIS FOR THE STANDARD TERMS AND GENERAL CONDITIONS

Ecology is establishing the following abbreviations for common terms used within this Statement of Basis.

Whenever possible, the same abbreviations will be used in the other documents which make up this Air Operating Permit. Consistency will not always be possible, due to wide range of sources which establish applicable requirements for the Hanford Site. Please consult the appropriate List of Abbreviations for each document when reviewing.

AA	Administrative Permit Amendment
AMP	Air Monitoring Plan
AOP	Air Operating Permit
ARAR	Applicable or Relevant and Appropriate Requirements
BCAA	Benton Clean Air Agency
CAA	Clean Air Act, either federal or Washington State
CERCLA	*Comprehensive Environmental Response, Compensation and Liability Act of 1980*
CFR	Code of Federal Regulations
CNRR	Changes Not Requiring a Permit Revision
CO_2e	Carbon Dioxide Equivalent
DOE	United States Department of Energy
Ecology	Washington State Department of Ecology
EE/CA	Engineering Evaluation/Cost Analysis
EPA	U.S. Environmental Protection Agency
FCAA	Federal Clean Air Act
GHG	Greenhouse Gas
HAP	Hazardous Air Pollutant
Health	Washington State Department of Health
IEU	Insignificant Emission Unit
MM	Minor Permit Modification
NESHAP	40 CFR Part 61 or 63, National Emission Standards for Hazardous Air Pollutants
NOC	Notice of Construction
NOT	Notice of Transition
NSPS	40 CFR Part 60, Standards of Performance for New Stationary Sources
NRC	Nuclear Regulatory Commission
OPC	Off-Permit Change
POC	Point of Contact
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RAWP	Risk Assessment Work Plan
RCW	Revised Code of Washington

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SM	Significant Modification
Statement	Statement of Basis
STGC	Standard Terms and General Conditions
tpy	Tons per year
U.S.	United States
WAC	Washington Administrative Code
WTP	Waste Treatment and Immobilization Plant

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BACKGROUND

This Statement of Basis (Statement) is issued as a separate supporting reference document to the Standard Terms and General Conditions (STGC) portion of the Hanford Site Air Operating Permit (AOP). This Statement sets forth the legal and factual basis for the AOP conditions and is not intended for enforcement purposes. This Statement also includes references to the applicable statutory or regulatory provisions, technical supporting information on specific emission units, and clarifications of specific requirements. [Washington Administrative Code (WAC) 173-401-700(8)]

In 1990, the U.S. Congress amended the federal Clean Air Act (CAA). One of those amendments created AOPs for industrial sources of air pollution (codified in Title V of the federal CAA). Prior to the creation of these permits, facility managers, regulators and the public had to look through many separate requirements to find those that applied to a certain facility. An AOP brings all applicable requirements into one place and requires the manager of the source to certify that it complies with all the applicable requirements. Further, the burden of proof for compliance changed from the regulating agencies to the sources.

In 1991, the Washington State Legislature updated the Washington CAA to make it consistent with the new federal Title V program. In 1993, Washington State Department of Ecology (Ecology) developed Washington's operating permits regulation under WAC 173-401 to comply with federal regulations and applied to the U.S. Environmental Protection Agency (EPA) for program approval. In November 1994, EPA granted Ecology interim approval for the AOP program. However, EPA also directed the state to correct several issues including Insignificant Emission Units (IEUs). Over disagreement with the IEU issue, it took many years' negotiation and litigation to resolve the differences. Finally, full approval of the state program and IEU language was issued to the State of Washington by EPA, effective on January 2, 2003. In 2020, the Washington State Legislature recodified the Washington CAA from Revised Code of Washington (RCW) 70.94 to RCW 70A.15.

The Washington CAA requires Ecology and the local air authorities to establish a program of renewable AOPs for major sources, as defined for Title V. Ecology is the lead agency for the Hanford Site AOP. The Hanford Site AOP is regulated and enforced by three agencies: Ecology, Washington State Department of Health (Health), and Benton Clean Air Agency (BCAA). Ecology regulates non-radioactive toxic and criteria air emissions under the authority of 42 United States Code 7401, et seq, RCW 70A.15, and WAC 173-400; Health regulates radioactive air emissions under the authority of RCW 70A.388, WAC 173-480, and WAC 246-247; and BCAA regulates outdoor burning under delegation from Ecology under the authority of RCW 70A.15, WAC 173-425, and BCAA Regulation 1, Article 5.

The Hanford Site AOP was initially issued on June 18, 2001, in accordance with WAC 173-401, covering the five-year operating period from July 2, 2001, to July 1, 2006. Renewal 1 was issued on December 29, 2006, covering January 1, 2007, to December 31, 2011. Renewal 2 was issued on April 1, 2013, covering April 1, 2013, to March 31, 2018. Renewal 3 was issued on July 15, 2019, covering August 1, 2019, to July 31, 2024.

The current AOP renewal (Renewal 4) has an issue date of [Date] and covers the five-year period from [Date], to [Date]. WAC 173-401-705(2) specifically allows for a source to continue to operate under an expired AOP if a timely and complete application was submitted to the permitting authority. The Permittee has done so for each renewal, preserving their right to operate until Ecology was able to issue the updated AOP.

The AOP renewal processes are subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected state and EPA reviews. [WAC 173-401-710(2)] Revision and modification processes vary based upon the type of change and are described in WAC 173-401-720 through 173-401-730.

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Definitions used in this Statement and the AOP are incorporated by reference from WAC 173-401-200, WAC 173-400-030, WAC 173-460-020, WAC 246-247-030, and those specified under BCAA Regulation 1 (and/or incorporated by reference therein). Specific definitions unique to this Statement and the AOP include the following:

- Discovery – qualitative determination that a potential threat to public health or safety exists or existed after an evaluation of pertinent information.
- Permitting Authority and Permitting Agencies – for the Hanford Site AOP, Ecology is the permitting authority as defined in WAC 173-401-200(23). Ecology, Health and BCAA are all permitting agencies with Ecology acting as the lead agency. Health and BCAA authorities are described in the Statements of Basis for Attachments 2 and 3, respectively.
- Significant emission unit or activity – for regulated air pollutants, excluding radionuclides, this is an emission unit that does not meet the criteria of IEUs as described in WAC 173-401-530.

The Statements are non-enforceable supporting reference documents that provide a rationale for the development of the permit and offer clarification where deemed necessary. The terms "permit" and "license" are synonymous; when a requirement pertains to compliance with the AOP the term "permit" will be used, and when a requirement references a WAC 246-247 action the term "license" will be used.

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1.0 RESERVED

2.0 GENERAL HANFORD SITE INFORMATION

The Hanford Site is included in the federal CAA Title V AOP Program because it is a "major source" of both Hazardous Air Pollutants (HAPs) and criteria pollutants, as defined in 40 Code of Federal Regulations (CFR) Part 70 and WAC 173-401-200. This is primarily based upon the Potential to Emit (PTE) for the Waste Treatment and Immobilization Plant (WTP) as limited by Prevention of Significant Deterioration (PSD) Permit PSD-02-01, Amendment 3, and diesel fuel-fired equipment, such as engines and boilers, which are used site-wide.

The application for PSD-02-01, Amendment 3, estimated PTE for oxides of nitrogen from WTP alone to be 147.5 tons per year (tpy), exceeding the 100 tpy threshold for criteria pollutants. This includes credit for enforceable limits and does not include emissions from non-WTP sources at Hanford. For HAPs, no site-wide PTE has been provided but U.S. Department of Energy (DOE) has consistently acknowledged that the Hanford Site exceeds the major-source thresholds of 10 tpy for any individual HAP or 25 tpy for total HAPs.

DOE hires contractors to operate and maintain equipment at the Hanford Site. Contractors may take a significant role in generating compliance records and responding to Ecology requests for information, but DOE is ultimately responsible for compliance with all applicable requirements identified in this AOP.

When it is necessary to determine whether a stationary source is part of the Hanford Site, Ecology will make it in accordance with current EPA guidance. At the time of Renewal 4 issuance, this is primarily the November 26, 2019, memorandum "Interpreting 'Adjacent' for New Source Review and Title V Source Determinations in All Industries Other Than Oil and Gas" (2019 Adjacency Guidance) and determinations published in EPA's Applicability Determination Index.

Ecology has not yet made formal determinations based upon the 2019 Adjacency Guidance. Ecology has reviewed numerous facilities on and near the Hanford Site to determine if they should be considered part of the same major source for Title V over the course of several decades. However, these determinations were made under previous guidance and may not be consistent with current EPA interpretations.

In accordance with the recommendation in the 2019 Adjacency Guidance, Ecology has not revisited source determinations which were based upon older guidance. The following is the Renewal 3 explanation of how these previous determinations were made.

Determinations Made Prior to Renewal 4 (Section 2.0 in Renewal 3): When a facility or entity is located on the Hanford Site, the presumption is that the facility or entity is under the control of one of the DOE Hanford Site operations offices that control waste management and restoration operations on the Hanford Site (Names of specific DOE operations offices have been removed to prevent confusion, due to office name changes after issuance of Renewal 3). Several entities operating on or near the Hanford Site under a contract or lease and are not under DOE control. The presumption of common control may be overcome and DOE Hanford Site operations offices may seek to exclude an entity from the Hanford Site AOP on a case-specific basis. The final decision is made and approved by Ecology with agreement from EPA.

In general, the following criteria will be used by Ecology and/or EPA to determine whether a source is to be included in the Hanford Site AOP:

- Is the percentage of the entity's output provided to DOE Hanford Site operations offices greater than 50 percent?

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- Do the lease/contract terms indicate that DOE Hanford Site operations offices will control the entity?
  - What do the lease/contract terms indicate with regard to pollution control/permitting responsibilities?
  - Who accepts responsibility for compliance with air quality control requirements?
  - Who accepts responsibility for violations of the requirements?
  - Does DOE have the power to issue a stop-work order to the entity for incidents or conditions harmful to the environment?
  - Does DOE exercise directing influence over the entities economic or other pollutant-emitting activities?
  - Does DOE have the power to make or veto decisions to implement major emission-control measures or to influence production levels or compliance with environmental regulations?
  - Does DOE control the performance of the entity?
- Can DOE Hanford Site operations offices make decisions that affect the entity's pollution control technologies?
- Does the entity share products, byproducts, equipment, other property, or pollution control equipment with DOE?
- Does the entity share a common workforce, plant manager, security forces, corporate executive officers, payroll activities, employee benefits, health plans, retirement funds, insurance coverage, or other administrative functions with DOE or a DOE contractor?

There are a number of privatized commercial facilities, including a nuclear power plant, a research facility to study gravitational waves, and a commercial low-level radioactive waste burial site located within the boundaries of the Hanford Site. Ecology has concluded these activities are not under the common control of DOE Hanford Site operations offices, and, consequently these facilities are not part of the Hanford Site. [WAC 173-401-200(17)]

For sites with multiple types of entities and relationships, the EPA has also provided additional interpretive guidance for determining which sources are to be included as part of the major source to be addressed in an AOP.[1]

The following paragraphs are provided to support the determination to exclude those facilities and activities listed in Section 2.0 of the STGC portion of the Hanford Site AOP. All future excluded facilities and activities will also be guided by the process outlined above. The following have been reviewed to not be part of the Hanford major source.

- Perma-Fix Northwest, Inc., Richland Facility.
- UniTech Services Group.
- Pacific Northwest National Laboratory Operated by Battelle Memorial Institute.
- Applied Process Engineering Laboratory.
- The Laser Interferometer Gravitational-Wave Observatory.
- Energy Northwest Facilities.
- All Port of Benton Facilities.

[1]EPA Guidance *Questions and Answers on the Requirements of Operating Permits Program Regulations*, July 7, 1993, and later correspondence on common control issues.

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- US Ecology, Inc. Commercial Low-Level Radioactive Waste Burial Site.
- Kaiser Aluminum and Chemical Corporation Extrusion Press Located in the 1100 Area.
- Framatome.
- Tri-City and Olympia Railroad.
- Environmental and Molecular Science Laboratory.
- Oasis Physical Therapy located at the Stevens Center.
- Montessori School located at the Stevens Center.
- Bulk Vitrification Testing Facility located across from Hammer in Richland.

3.0 EMISSION UNITS IDENTIFICATION

Emission units subject to this permit are identified in Attachments 1 through 3 of the Hanford Site AOP.

4.0 PERMIT PROVISOS

All emission units within the Hanford Site AOP must comply with all standard terms and conditions in WAC 173-401-620(2). The STGC are applicable to all Chapter 401 (WAC 173-401) sources, including IEUs, in the State of Washington.

Subsection 4.1 of the AOP STGC identifies the 40 CFR 70 permit shield that 'shields' an owner or operator of a source from liability for inadvertent noncompliance with applicable requirements, such as those incorporated from 40 CFR, WAC 173-400 and 173-401, and RCW 70.A.15, while following approved AOP conditions if the certified permit applications were true and accurate. Nothing in any 40 CFR 70 permit alters or affects the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance. [40 CFR 70.6(f)(3)(ii)].

The 1997 EPA Guidance (*EPA Guidance on Title V Permit Shield Implementation*, 4APT-ARB May 23, 1997, by EPA-4 Air & Radiation Technology Branch Chief R. Douglas Neeley) summarized EPA's position on the appropriate implementation of the Title V permit shield. The State of Washington maintains the same position as indicated in WAC 173-401-640 regarding applicable requirements, inapplicable requirements, omissions and exclusions.

A timely and complete application for the fourth renewal of the AOP was submitted November 13, 2023. Therefore, the application shield was granted and the Hanford Site continued operations under the existing AOP until the new permit was issued and approved pursuant to WAC 173-401-710.

A source seeking a determination of non-applicability for new source review requirements to a particular change would need to provide the permit authority with detailed information regarding that change. The inapplicable requirements are identified in Table A-1. Before the permit shield can extend to requirements that are not imposed on the source in the permit, the permit authority must specifically determine, based on information provided by the source in the permit application, that such other requirements do not apply to the source. A request to extend the permit shield to requirements deemed inapplicable to the source may be made either in the original permit application or in an application for a permit modification.

Regulations promulgated under statutory authority other than the federal CAA (e.g., *Resource Conservation and Recovery Act of 1976* and *Comprehensive Environmental Response, Compensation and Liability Act of 1980* [CERCLA]) are not Title V applicable requirements and are not included in this AOP, e.g., Subparts AA, BB, and CC of 40 CFR 264 and 265. In addition, actions taken pursuant to CERCLA, after proper documentation and verification of removal and remediation activities, are exempt from clean air permitting requirements. There are two key considerations to satisfy in the transition process: (1) proper public notice and review, and (2) no lapse from CAA permitting requirements to onset of CERCLA activities.

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The following process delineates the steps to remove AOP permitting conditions or certifications for facilities or activities under CERCLA transition:

- Permittee will prepare Engineering Evaluation/Cost Analysis (EE/CA) or equivalent CERCLA documentation for a facility (or activity) identified for CERCLA transition. This document will be reviewed by regulators, stakeholders, and the public.
- This document will clearly identify general CAA requirements to be transitioned to CERCLA. Consistent with the WAC 173-401-800 requirement, the public review period must be a minimum of 30 days with proper notification on the AOP Permit Register and local newspaper. The notice on the AOP permit register will state that the facility's air permits will be discontinued upon onset of remediation activity in the field.
- After the EE/CA or equivalent is approved, Permittee will prepare a Risk Assessment Work Plan (RAWP) or equivalent Applicable or Relevant and Appropriate Requirements (ARAR) implementation document, such as an Air Monitoring Plan (AMP) to identify method to meet the substantive portions of existing air permit conditions, and describe the transition plan for CERCLA air monitoring. EPA, Ecology, and Health will review the ARAR implementation document, as directed by the lead agency.
- Concurrently, Permittee will submit to Ecology, Health, and EPA a Notice of Transition (NOT) (from CAA to CERCLA) for review and approval. The NOT must reference the CERCLA authority documentation, identify any/all documentation of agency air approvals (EPA/Health/Ecology) in place prior to and after CERCLA transition.
- Ecology/Health/EPA will review the NOT. If the NOT is contested by an agency, an issue resolution process will be initiated between the lead agency and the lead regulatory agency. For actions not contested, the effective date (not the approval date) will coincide with the onset of the CERCLA remediation activity in the field. The facility's air permits can be discontinued after the effective date of the NOT.
- Via formal correspondence, Permittee will notify affected agencies of date to begin remediation activity. It is important to notify Ecology and/or Health that physical fieldwork of the CERCLA action has commenced. Upon receiving the notice of fieldwork commencement, Ecology will then notify the public that the previously applicable permits, licenses, Notice of Construction (NOC), and AOP requirements have now been supplanted by the ARAR implementation document (e.g., RAWP and AMP). Permittee is no longer required to certify to AOP requirements after the onset of the actual decontamination and decommissioning activity.
- Ecology and Health will delete the affected licenses and NOCs from the enforceable list, and remove permitting conditions from the AOP as an administrative modification at the next significant modification.
- The CAA transition to CERCLA process is deemed complete at this point.

Subsection 4.1.1 of the AOP STGC describes how compliance with the terms and conditions of the AOP is deemed compliant with the applicable requirements on which that condition is based as of the date of the AOP issuance.

Subsection 4.1.2 of the AOP STGC describes how WAC 173-401-530 establishes several criteria for determining if an emission unit is insignificant. Section 1.1 of the Statement of Basis for Attachment 1 contains a list of IEUs from the AOP renewal application (DOE/RL-2017-31, Section 2.4). WAC 173-401 defines how lists should be maintained during the application phase and following permit issuance. The applicant is required to amend their application if an IEU, based on actual emissions, subsequently will exceed an actual emission threshold, and the IEU must be listed in the AOP. This requirement extends until the draft permit is issued. The AOP regulations do not require that each IEU be listed in the AOP.

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Following AOP issuance, no emission unit that qualifies as an IEU based on actual emissions can exceed the emission thresholds in WAC 173-401 without first obtaining a permit modification.

Attachment 1 of the AOP, Section 1.4, Discharge Points includes only the emission limits and conditions identified in the "Approval Conditions" section of the regulatory orders and applicable portions of any pertinent National Emission Standards for Hazardous Air Pollutants (NESHAP) or Standards of Performance for New Stationary Sources (NSPS). Information included in other sections of the orders, such as "Findings," "Background," "Description," or similarly titled sections are not included in Section 1.4. Section 1.4 is intended to capture the periodic monitoring, emission limits, and other approval conditions for emission units. However, Section 1.4 does not list all conditions. Most of the excluded conditions have been captured elsewhere in the AOP as applicable requirements. The categories of excluded approval conditions include the following:

- Conditions and requirements addressed in Section 3.0, STGC, of the Hanford Site AOP.
- Conditions and requirements addressed in Section 5.0, STGC, of the Hanford Site AOP, such as the condition to send reports to the Ecology office or the requirement to allow access to the facility for inspection.
- Conditions and requirements that re-state portions of applicable codified regulations.
- The requirement to prepare and maintain an Operation and Maintenance Manual.

Subsection 4.10 of the AOP STGC addresses potential permitting actions which might be taken in response to material mistakes in an application or issued permit.

Subsection 4.11 of the AOP STGC describes the condition for AOP continuation in case that the renewed AOP has not been issued on or before the expiration date. All terms and conditions of the existing AOP, including any permit shield provided under WAC 173-401-640, will not expire until the renewal permit has been issued if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) will remain in effect until the renewal permit has been issued if a timely and complete application has been submitted.

5.0 PERMIT ADMINISTRATION

General conditions (including monitoring, compliance inspection, recordkeeping, and reporting requirements) are applicable to all emission units in the Hanford Site AOP.

Subsection 5.4 of the AOP STGC ensures that the records to demonstrate compliance are available within a reasonable time. Reasonable time, for most records that are kept at an emission unit, should be available to Ecology within 48 hours. Records maintained at a central repository at the Hanford Site, or within a contractor's record management system, should be made available upon a written request from Ecology with a deadline based on volume, age and type of record requested (electronic versus hard copies).

The Permittee must provide requested classified documents to representatives of Ecology, Health, or BCAA who have the appropriate security clearance and a demonstrable need to know. The records will be processed through the clearance process established by DOE and submitted to the agency within a reasonable time after they are cleared.

Subsection 5.5 of the AOP STGC describes the requirements for any form, application, notice, report, or compliance certification required under RCW 70A.15 or 70A.25, or any ordinance, resolution, regulations, permit, or order in force pursuant thereto. The Permittee must not tamper or make false statements, and must ensure truth, accuracy, and completeness in every document submitted to the regulatory agencies that has a regulation applicable under this permit.

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Approval orders applicable to activities will end at activity completion, as described in the NOC application. The Permittee is not required to continue to comply with approval order terms and conditions after these become irrelevant. Examples are initial testing requirements and completed and closed NOCs and emission units.

Subsection 5.6 of the AOP STGC describes the semiannual report content and required data to be submitted every 6 months. The semiannual report will not include IEUs for Ecology and will not include diffuse and fugitive minor emission units and as low as reasonably achievable control technologies for Health. The reporting of diffuse and fugitive minor emission units in the annual NESHAPs report will ensure adequate compliance to the specific terms and conditions and the STGC applicable to emission generation for these types of emission units. In addition to these diffuse and fugitive emission units, it is understood per agreement with Health that the "Emission Unit Information" section of emission units listed in the Health License (FF-01) will not be required to be certified under the annual compliance certification.

Health has consolidated the Hanford Site Radiological Licenses into a single License (FF-01 contained in Attachment 2). The revision process to the License satisfies the requirement for semiannual reports. Therefore, each license revision letter number will be listed in the semiannual reports, along with any NOC approvals issued by either Ecology or Health.

For all approvals, License activities, and emission units that are closed prior to the reporting period and considered irrelevant and the applicable AOP modification is submitted to the agency under Section 5.15 the Permittee is not required to report.

Subsection 5.8 of the AOP STGC stipulates that the Permittee is not required to conduct monitoring and associated recordkeeping for emission units that do not operate continuously and are temporarily or permanently shut down. For example, if the monitoring requires continuous sampling or recording pressure drop daily, such readings would not be required on any full day in which the emission unit did not operate. The information required to be reported when the emission unit is not operational is described.

For all approvals, License activities, and emission units that are closed and considered irrelevant and the applicable AOP modification is submitted to the agency under Section 5.15 the Permittee is not required to conduct the monitoring and associated recordkeeping.

Subsection 5.10 of the AOP STGC describes the annual compliance certification content and required data to be submitted every year for the previous year's operations of the emission units listed in the AOP. The annual compliance certification will not include IEUs for Ecology and will not include diffuse and fugitive minor emission units for Health. The reporting of diffuse and fugitive minor emission units in the annual NESHAPs report will ensure adequate compliance to the specific terms and conditions and the STGC applicable to emission generation for these types of emission units. In addition to these diffuse and fugitive emission units, it is understood per agreement with Health that the "Emission Unit Information" section of emission units listed in the Health License FF-01 will not be required to be certified under the annual compliance certification.

For all approvals, License activities, and emission units that are closed and considered prior to January of the reporting period will not be included in the annual compliance certification.

Subsection 5.15 of the AOP STGC describes actions that the permittee may take when an emission unit, condition, term, limit or other requirement not related to monitoring or recordkeeping becomes irrelevant during the term of the AOP.

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Approval orders/licenses applicable to activities will end at activity completion, as described in the NOC applications. The Permittee is not required to continue to comply with approval order terms and conditions after they become irrelevant. For example, many approval orders contain the requirement to conduct an initial, one time only, startup test. Once that initial startup test requirement has been satisfactorily completed, that condition is deemed irrelevant, and the permittee is no longer bound by that particular requirement. An approval or license activity that is closed pursuant to the agency's regulations is considered irrelevant. In addition, the permittee may remove the approval order or license activity and associated terms and conditions from the AOP by submitting a change not requiring a permit revision AOP modification to the applicable agency and Ecology.

Subsection 5.17 of the AOP STGC describes the actions required for greenhouse gases (GHGs). On October 30, 2009, EPA published a rule for the mandatory reporting of GHGs (also referred to as 40 CFR Part 98) from large GHG emissions sources. The rule applies to certain facilities, including those which emit 25,000 metric tons of carbon dioxide equivalents (CO_2e) or more per year in combined emissions from all applicable sources, including stationary fuel combustion sources. Hanford's GHG emissions for calendar years 2012 - 2016 were about 15,000 tons. Hanford's potential GHG emissions will be approximately 285,768 metric tons of CO_2e per year when the Waste Treatment Plant facilities begin operations. Therefore, Hanford may be subject to the Mandatory Greenhouse Gas Reporting rule.

Regardless of applicability of the Mandatory Greenhouse Gas Reporting rule to Hanford, 40 CFR Part 98, *Mandatory Greenhouse Gas Reporting*, is not an AOP applicable requirement. According to EPA guidance as published in the Federal Register (FR) as 56288 FR 74:209, Friday, October 30, 2009, the requirements imposed by this rule are not applicable requirements under the Title V operating permit program. Therefore, requirements of the GHG rule have not been included in this permit.

On December 1, 2010, Ecology promulgated WAC 173-441, *Reporting of emissions of greenhouse gases*. The WAC incorporates by reference certain calculation methods and other requirements from 40 CFR Part 98, the federal Mandatory Greenhouse Gas Reporting rule. The WAC applies to any facility that emits 10,000 metric tons of CO_2e or more per calendar year in total GHG emissions, including biogenic carbon dioxide, from all applicable source categories listed in WAC 173-441-120.

Hanford may be subject to the requirements of WAC 173-441 if actual GHG emissions are greater than 10,000 metric tons of CO_2e per year. Potential GHG emissions at Hanford are 285,768 metric tons of CO_2e per year. As owner of the Hanford Site, DOE is required to demonstrate compliance with all applicable provisions of WAC 173-441.

On September 29, 2022, Ecology promulgated WAC 173-446, *Climate commitment act program rule*. The Climate Commitment Act (CCA) Program Rule rulemaking established the Cap-and-Invest Program, an economy-wide market-based program to reduce carbon pollution and achieve the GHG limits set in state law. Facilities are covered by the Cap-and-Invest Program if their annual reported covered emissions exceeded 25,000 metric tons of CO_2e for any calendar year 2015 or later or if they voluntarily opt into the Cap-and-Invest Program. All entities covered by the Cap-and-Invest Program must obtain allowances equal to their covered emissions and submit them to Ecology each compliance period. Allowances can be purchased at state-run auctions or on the secondary market. The program-wide allowance budget gradually reduces from the initial baseline on a schedule set in WAC 173-446-210.

The Hanford Site is not expected to be a mandatory covered entity under the CCA Program Rule because the majority of on-site facility GHG emissions come from combustion of diesel fuel and propane. GHGs from diesel and propane combustion are specifically covered emissions for the upstream fuel supplier, rather than the end user. In contrast, GHG emissions from on-site combustion of natural gas would be covered emissions for the Hanford Site, if the Hanford Site exceeded the coverage threshold of 25,000 metric tons of CO_2e. Changes in processes or fuel use, or the decision to opt into the CCA Program Rule, could make the Hanford Site a participant in the Cap-and-Invest Program. However, Ecology has

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determined that WAC 173-446 would not be an applicable requirement for the Title V operating permit program. EPA-457/B-11-001, *PSD and Title V Permitting Guidance for Greenhouse Gases* states that under the Tailoring Rule:

> … any applicable requirement for GHGs must be addressed in the title V permit (i.e., the permit must contain conditions necessary to assure compliance with applicable requirements for GHGs). It is important to note that GHG reporting requirements for sources established under EPA's final rule for mandatory reporting of GHGs (40 CFR Part 98: *Mandatory Greenhouse Gas Reporting*, hereafter referred to as the "GHG reporting rule") are currently not included in the definition of applicable requirements in 40 CFR 70.2. Although the requirements contained in the GHG reporting rule currently are not considered applicable requirements under the title V regulations, the source is not relieved from the requirement to comply with the GHG reporting rule separately from compliance with their title V operating permit. It is the responsibility of each source to determine the applicability of the GHG reporting rule and to comply with it, as necessary. However, since the requirements of the GHG reporting rule are not considered applicable requirements under title V, they do not need to be included in the title V permit.

As the Permittee currently has no other federally enforceable requirements related to GHG emissions (e.g., GHG best available control technology requirements resulting from PSD review process), Section 5.17 covers State-Only GHG requirements in WAC 173-441. WAC 173-441 reporting requirements are in metric tons.

Subsection 5.18 addresses requirements for submitting an application to revise AOP text through a renewal, administrative amendment, or modification. Prior to Renewal 4, this Statement also included AOP application/notification forms and streamlined instructions addressing various types of changes at the Hanford Site. Starting with Renewal 4, Ecology has instituted a configuration control system to ensure that site changes are properly classified for, and integrated into, the AOP. Configuration control includes electronic methods for DOE to submit required information to Ecology for review and concurrence.

For renewal applications, DOE must submit the most recent version of Ecology Form 94-175 and any supplemental information necessary to address all data elements listed in WAC 173-401-510. For site changes (not including renewal applications), DOE should submit project information through Ecology's electronic systems and proceed as directed. Where appropriate, DOE may continue to use the Renewal 3 notification forms to inform EPA, affected states, and other entities of site changes.

For Renewal 4, Ecology received the renewal application on November 13, 2023. The renewal application was submitted and deemed complete according to the criteria in WAC 173-401-500 more than 6 months before the date of AOP expiration on August 1, 2024. With a timely renewal application, the Permittee's rights to operational continuity and permit shield are described in WAC 173-401-620 and -640.

Subsection 5.19 of the AOP STGC addresses facility changes which do not require immediate revision of the AOP itself, such as installation of new equipment which is not addressed in the AOP and which would not cause existing equipment to violate any term or condition. In many cases, an Off-Permit Change for the AOP would be subject to separate New Source Review permitting which would then be incorporated into the next AOP renewal.

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Subsection 5.20 of the AOP STGC addresses a limited set of facility changes which EPA has identified as not requiring revision of the AOP, even if they might be related to equipment which is already incorporated in the AOP. The scope of these changes is limited and all applicable New Source Review requirements must be satisfied. In EPA guidance, one example of a change not requiring AOP revision might be addition of a new surface coating product in a paint booth if the existing limits and requirements are written in a way that would already cover the new coating.

Subsection 5.21 of the AOP STGC addresses the circumstances and procedures for Ecology to reopen the AOP to add or correct requirements, even if an application for a modification is not submitted by the Permittee.

Subsection 5.25 of the AOP STGC addresses the procedures for complying with federal regulations for asbestos related to renovations and demolitions. Any demolition, unless conducted under CERCLA, and renovations exceeding regulatory thresholds require a notification at least 10 working days prior to these activities. For any facility which is part of the Hanford Site, these notifications must go to Ecology. Facilities in Benton County which are not part of the Hanford Site, as discussed in Section 2.0 above, would be under the authority of BCAA.

This subsection also forbids intentional burning as a method of demolition unless Health has reviewed for potential radiological air emissions and BCAA has authorized open burning. These requirements are included because the federal regulations do not consider additional requirements to which the Hanford Site is subject when addressing demolition through burning.

Subsection 5.28 of the AOP STGC describes why certain regulatory requirements are not applicable to the Hanford Site AOP. Inapplicable requirements at the time of AOP issuance are shown in Table A-1.

6.0 STATEMENT OF BASIS

This Statement is issued as a separate supporting reference document to the AOP. It is non-enforceable, and sets forth the legal and factual basis for permit conditions. This Statement includes references to the applicable statutory or regulatory provisions, technical supporting information on specific emission units, and clarifications of specific requirements. [WAC 173-401-700(8)]

7.0 ATTACHMENTS

Attachment 1: *Non-Radioactive Air Approval Orders, Permits, and Regulations Primarily Enforced by Ecology.*

The Permittee is authorized to operate the non-radioactive portion of the air emission units identified in this attachment and all IEUs not specifically identified in this permit.

Attachment 2: *Radioactive Air Emissions License FF-01,* as incorporated.

The Permittee is authorized to operate the radioactive portion of the air emission units identified in this attachment.

Attachment 3: *Outdoor Burning Regulations Primarily Enforced by the Benton Clean Air Agency.*

The Permittee is authorized to operate the air emission units identified as open burning related activities. Because these requirements could be triggered at various places on the Hanford Site, the emission units are not listed individually in the air operating permit.

8.0 APPENDIX A

Inapplicable requirements are addressed in STGC Subsection 5.28, and below. Ecology has determined that the Hanford Site, including all sources, is not subject to certain requirements. In accordance with the provisions of WAC 173-401-640(2), inapplicable requirements at the time of permit issuance are shown in Table A-1. The permit shield will apply to these inapplicable requirements. [WAC 173-401-640(2)]

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
BCAA, Regulation 1, Articles 1, 2, 3, 4, 6, 7, 8, 9 (Note: Regulation 1, Article 5 is applicable)	Authority to regulate Hanford Site air emissions pre-empted by Ecology.
WAC 173-400-040(4)(b)	Not identified as a significant contributor to the nonattainment status of a designated nonattainment area.
WAC 173-400-040(9)(b)	Not identified as a significant contributor to a PM-10 or PM-2.5 nonattainment area.
WAC 173-400-070, *Emission standards for certain source categories*	No affected sources.
WAC 173-400-105(5)(b), (c) and (d), Continuous monitoring and recording for sulfuric acid plants, fluid bed catalytic cracking units, and wood residue fuel-fired steam generators	No affected sources.
WAC 173-400-112, *Requirements for new sources in nonattainment areas—Review for compliance with regulations*	The Hanford Site and surrounding areas are not classified as nonattainment areas for any regulated pollutant.
WAC 173-400-151, *Retrofit requirements for visibility protection*	Not identified as a cause or contributor to visibility impairment in any mandatory Class I area.
WAC 173-400-190, *Requirements for nonattainment areas*	Not located in a nonattainment area.
WAC 173-400-210, *Emission requirements of prior jurisdictions*	The Hanford Site always has been regulated by Ecology. No prior local authority regulation.
WAC 173-405, *Kraft Pulping Mills*	No affected sources.
WAC 173-406, *Acid Rain Regulation*	No affected sources.
WAC 173-407, *Greenhouse gas mitigation requirements and emissions performance standard for power plants*	No affected sources.
WAC 173-410, *Sulfite pulping mills*	No affected sources.
WAC 173-415, *Primary aluminum plants*	No affected sources.
WAC 173-421, *Motor vehicle emission control systems*	Not located in an area requiring a vehicle inspection program.
WAC 173-430, *Agricultural burning*	No affected sources.
WAC 173-433, *Solid fuel burning devices*	No affected sources.
WAC 173-434, *Solid waste incinerator facilities*	No affected sources.
WAC 173-446, *Climate commitment act program rule*	Total covered GHG emissions do not meet the applicability threshold. Diesel emissions are exempt pursuant to WAC 173-446-040(3).
WAC 173-490, *Emission standards and controls for sources emitting volatile organic compounds (VOC)*	Not located in a designated ozone nonattainment area.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
WAC 173-492, *Motor fuel specifications for oxygenated gasoline*	Not located in the control areas requiring oxygenated gasoline use.
WAC 246-247-060(10), Commercial Nuclear Power Plants	The Permittee does not operate a commercial nuclear power plant.
WAC 246-247-075(5) and (7), Nuclear Regulatory Commission (NRC)	The Permittee does not have point source emissions from NRC licensed facilities.
WAC 463-78, *General and operating permit regulations for air pollution sources*	The site emission sources are not subject to Energy Facility Site Evaluation Council jurisdiction and/or authority.
40 CFR 60 Subpart B	These are permitting authority procedural requirements.
40 CFR 60 Subpart C	These are permitting authority procedural requirements.
40 CFR 60 Subpart Cb	No affected sources.
40 CFR 60 Subpart Cc	No affected sources.
40 CFR 60 Subpart Cd	No affected sources.
40 CFR 60 Subpart Ce	No affected sources.
40 CFR 60 Subpart Cf	The Municipal Solid Waste landfill meets the conditions of 60.3F(d)(1).
40 CFR 60 Subpart D	No affected sources.
40 CFR 60 Subpart Da	No affected sources.
40 CFR 60 Subpart Db	No affected sources.
40 CFR 60 Subpart E	No affected sources.
40 CFR 60 Subpart Ea	No affected sources.
40 CFR 60 Subpart Eb	No affected sources.
40 CFR 60 Subpart Ec	No affected sources.
40 CFR 60 Subpart F	No affected sources.
40 CFR 60 Subpart G	No affected sources.
40 CFR 60 Subpart Ga	No affected sources
40 CFR 60 Subpart H	No affected sources.
40 CFR 60 Subpart I	No affected sources.
40 CFR 60 Subpart J	No affected sources.
40 CFR 60 Subpart Ja	No affected sources.
40 CFR 60 Subpart K	No affected sources.
40 CFR 60 Subpart Ka	No affected sources.
40 CFR 60 Subpart Kb	No affected sources.
40 CFR 60 Subpart L	No affected sources.
40 CFR 60 Subpart La	No affected sources.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 60 Subpart M	No affected sources.
40 CFR 60 Subpart N	No affected sources.
40 CFR 60 Subpart Na	No affected sources.
40 CFR 60 Subpart O	No affected sources.
40 CFR 60 Subpart P	No affected sources.
40 CFR 60 Subpart Q	No affected sources.
40 CFR 60 Subpart R	No affected sources.
40 CFR 60 Subpart S	No affected sources.
40 CFR 60 Subpart T	No affected sources.
40 CFR 60 Subpart U	No affected sources.
40 CFR 60 Subpart V	No affected sources.
40 CFR 60 Subpart W	No affected sources.
40 CFR 60 Subpart X	No affected sources.
40 CFR 60 Subpart Y	No affected sources.
40 CFR 60 Subpart Z	No affected sources.
40 CFR 60 Subpart AA	No affected sources.
40 CFR 60 Subpart AAa	No affected sources.
40 CFR 60 Subpart AAb	No affected units.
40 CFR 60 Subpart BB	No affected sources.
40 CFR 60 Subpart BBa	No affected sources.
40 CFR 60 Subpart CC	No affected sources.
40 CFR 60 Subpart DD	No affected sources.
40 CFR 60 Subpart EE	No affected sources.
40 CFR 60 Subpart GG	No affected sources.
40 CFR 60 Subpart HH	No affected sources.
40 CFR 60 Subpart KK	No affected sources.
40 CFR 60 Subpart KKa	No affected units.
40 CFR 60 Subpart LL	No affected sources.
40 CFR 60 Subpart MM	No affected sources.
40 CFR 60 Subpart MMa	No affected sources.
40 CFR 60 Subpart NN	No affected sources.
40 CFR 60 Subpart PP	No affected sources.
40 CFR 60 Subpart QQ	No affected sources.
40 CFR 60 Subpart RR	No affected sources.
40 CFR 60 Subpart SS	No affected sources.
40 CFR 60 Subpart TT	No affected sources.
40 CFR 60 Subpart UU	No affected sources.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 60 Subpart VV	No affected sources.
40 CFR 60 Subpart VVa	No affected sources.
40 CFR 60 Subpart WW	No affected sources.
40 CFR 60 Subpart XX	No affected sources.
40 CFR 60 Subpart AAA	No affected sources.
40 CFR 60 Subpart BBB	No affected sources.
40 CFR 60 Subpart DDD	No affected sources.
40 CFR 60 Subpart FFF	No affected sources.
40 CFR 60 Subpart GGG	No affected sources.
40 CFR 60 Subpart GGGa	No affected sources.
40 CFR 60 Subpart HHH	No affected sources.
40 CFR 60 Subpart III	No affected sources.
40 CFR 60 Subpart JJJ	No affected sources.
40 CFR 60 Subpart KKK	No affected sources.
40 CFR 60 Subpart LLL	No affected sources.
40 CFR 60 Subpart NNN	No affected sources.
40 CFR 60 Subpart OOO	No affected sources.
40 CFR 60 Subpart PPP	No affected sources.
40 CFR 60 Subpart QQQ	No affected sources.
40 CFR 60 Subpart RRR	No affected sources.
40 CFR 60 Subpart SSS	No affected sources.
40 CFR 60 Subpart TTT	No affected sources.
40 CFR 60 Subpart TTTa	No affected sources.
40 CFR 60 Subpart UUU	No affected sources.
40 CFR 60 Subpart VVV	No affected sources.
40 CFR 60 Subpart WWW	No affected sources.
40 CFR 60 Subpart XXX	No affected sources.
40 CFR 60 Subpart AAAA	No affected sources.
40 CFR 60 Subpart BBBB	No affected sources.
40 CFR 60 Subpart CCCC	No affected sources.
40 CFR 60 Subpart DDDD	No affected sources.
40 CFR 60 Subpart EEEE	No affected sources.
40 CFR 60 Subpart FFFF	No affected sources.
40 CFR 60 Subpart LLLL	No affected sources.
40 CFR 60 Subpart MMMM	No affected sources.
40 CFR 60 Subpart OOOO	No affected sources.
40 CFR 60 Subpart OOOOa	No affected sources.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 60 Subpart OOOOb	No affected sources.
40 CFR 60 Subpart OOOOc	No affected sources.
40 CFR 60 Subpart QQQQ	No affected sources.
40 CFR 60 Subpart TTTT	No affected sources.
40 CFR 60 Subpart UUUUa	No affected sources.
40 CFR 61 Subpart B	No affected sources.
40 CFR 61 Subpart C	No affected sources.
40 CFR 61 Subpart D	No affected sources.
40 CFR 61 Subpart E	No affected sources.
40 CFR 61 Subpart F	No affected sources.
40 CFR 61 Subpart I	No affected sources.
40 CFR 61 Subpart J	No affected sources.
40 CFR 61 Subpart K	No affected sources.
40 CFR 61 Subpart L	No affected sources.
40 CFR 61 Subpart N	No affected sources.
40 CFR 61 Subpart O	No affected sources.
40 CFR 61 Subpart P	No affected sources.
40 CFR 61 Subpart Q	No affected sources.
40 CFR 61 Subpart R	No affected sources.
40 CFR 61 Subpart T	No affected sources.
40 CFR 61 Subpart V	No affected sources.
40 CFR 61 Subpart W	No affected sources.
40 CFR 61 Subpart Y	No affected sources.
40 CFR 61 Subpart BB	No affected sources.
40 CFR 61 Subpart FF	No affected sources.
40 CFR 63 Subpart E	These are permitting authority procedural requirements.
40 CFR 63 Subpart F	No affected sources.
40 CFR 63 Subpart G	No affected sources.
40 CFR 63 Subpart H	No affected sources.
40 CFR 63 Subpart I	No affected sources.
40 CFR 63 Subpart J	No affected sources.
40 CFR 63 Subpart L	No affected sources.
40 CFR 63 Subpart M	No affected sources.
40 CFR 63 Subpart N	No affected sources.
40 CFR 63 Subpart O	No affected sources.
40 CFR 63 Subpart Q	No affected sources.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 63 Subpart R	No affected sources.
40 CFR 63 Subpart S	No affected sources.
40 CFR 63 Subpart T	No affected sources.
40 CFR 63 Subpart U	No affected sources.
40 CFR 63 Subpart W	No affected sources.
40 CFR 63 Subpart X	No affected sources.
40 CFR 63 Subpart Y	No affected sources.
40 CFR 63 Subpart AA	No affected sources.
40 CFR 63 Subpart BB	No affected sources.
40 CFR 63 Subpart CC	No affected sources.
40 CFR 63 Subpart DD	No affected sources.
40 CFR 63 Subpart EE	No affected sources.
40 CFR 63 Subpart GG	No affected sources.
40 CFR 63 Subpart HH	No affected sources.
40 CFR 63 Subpart II	No affected sources.
40 CFR 63 Subpart JJ	No affected sources.
40 CFR 63 Subpart KK	No affected sources.
40 CFR 63 Subpart LL	No affected sources.
40 CFR 63 Subpart MM	No affected sources.
40 CFR 63 Subpart NN	No affected sources.
40 CFR 63 Subpart OO	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart PP	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart QQ	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart RR	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart SS	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart TT	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart UU	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart VV	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart WW	No affected sources subject to other rule subparts that reference this section.
40 CFR 63 Subpart XX	No affected sources.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 63 Subpart YY	No affected sources.
40 CFR 63 Subpart CCC	No affected sources.
40 CFR 63 Subpart DDD	No affected sources.
40 CFR 63 Subpart EEE	No affected sources.
40 CFR 63 Subpart GGG	No affected sources.
40 CFR 63 Subpart HHH	No affected sources.
40 CFR 63 Subpart III	No affected sources.
40 CFR 63 Subpart JJJ	No affected sources.
40 CFR 63 Subpart LLL	No affected sources.
40 CFR 63 Subpart MMM	No affected sources.
40 CFR 63 Subpart NNN	No affected sources.
40 CFR 63 Subpart OOO	No affected sources.
40 CFR 63 Subpart PPP	No affected sources.
40 CFR 63 Subpart QQQ	No affected sources.
40 CFR 63 Subpart RRR	No affected sources.
40 CFR 63 Subpart TTT	No affected sources.
40 CFR 63 Subpart UUU	No affected sources.
40 CFR 63 Subpart VVV	No affected sources.
40 CFR 63 Subpart XXX	No affected sources.
40 CFR 63 Subpart AAAA	No affected sources.
40 CFR 63 Subpart CCCC	No affected sources.
40 CFR 63 Subpart DDDD	No affected sources.
40 CFR 63 Subpart EEEE	No affected sources.
40 CFR 63 Subpart FFFF	No affected sources.
40 CFR 63 Subpart GGGG	No affected sources.
40 CFR 63 Subpart HHHH	No affected sources.
40 CFR 63 Subpart IIII	No affected sources.
40 CFR 63 Subpart JJJJ	No affected sources.
40 CFR 63 Subpart KKKK	No affected sources.
40 CFR 63 Subpart MMMM	No affected sources.
40 CFR 63 Subpart NNNN	No affected sources.
40 CFR 63 Subpart OOOO	No affected sources.
40 CFR 63 Subpart PPPP	No affected sources.
40 CFR 63 Subpart QQQQ	No affected sources.
40 CFR 63 Subpart RRRR	No affected sources.
40 CFR 63 Subpart SSSS	No affected sources.
40 CFR 63 Subpart TTTT	No affected sources.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 63 Subpart UUUU	No affected sources.
40 CFR 63 Subpart VVVV	No affected sources.
40 CFR 63 Subpart WWWW	No affected sources.
40 CFR 63 Subpart XXXX	No affected sources.
40 CFR 63 Subpart AAAAA	No affected sources.
40 CFR 63 Subpart BBBBB	No affected sources.
40 CFR 63 Subpart CCCCC	No affected sources.
40 CFR 63 Subpart EEEEE	No affected sources.
40 CFR 63 Subpart FFFFF	No affected sources.
40 CFR 63 Subparts HHHHH	No affected sources.
40 CFR 63 Subpart IIIII	No affected sources.
40 CFR 63 Subpart JJJJJ	No affected sources.
40 CFR 63 Subpart KKKKK	No affected sources.
40 CFR 63 Subpart LLLLL	No affected sources.
40 CFR 63 Subpart MMMMM	No affected sources.
40 CFR 63 Subpart NNNNN	No affected sources.
40 CFR 63 Subpart PPPPP	No affected sources.
40 CFR 63 Subpart QQQQQ	No affected sources.
40 CFR 63 Subpart RRRRR	No affected sources.
40 CFR 63 Subpart SSSSS	No affected sources.
40 CFR 63 Subpart TTTTT	No affected sources.
40 CFR 63 Subpart UUUUU	No affected sources.
40 CFR 63 Subpart WWWWW	No affected sources.
40 CFR 63 Subpart YYYYY	Not an Area Source.
40 CFR 63 Subpart ZZZZZ	Not an Area Source.
40 CFR 63 Subpart BBBBBB	Not an Area Source.
40 CFR 63 Subpart CCCCCC	Not an Area Source.
40 CFR 63 Subpart DDDDDD	Not an Area Source.
40 CFR 63 Subpart EEEEEE	Not an Area Source.
40 CFR 63 Subpart FFFFFF	Not an Area Source.
40 CFR 63 Subpart GGGGGG	Not an Area Source.
40 CFR 63 Subpart HHHHHH	Not an Area Source.
40 CFR 63 Subpart JJJJJJ	Not an Area Source.
40 CFR 63 Subpart LLLLLL	Not an Area Source.
40 CFR 63 Subpart MMMMMM	Not an Area Source.
40 CFR 63 Subpart NNNNNN	Not an Area Source.
40 CFR 63 Subpart OOOOOO	Not an Area Source.

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Table A-1 Inapplicable Requirements

Requirement	Reason for Inapplicability
40 CFR 63 Subpart PPPPPP	Not an Area Source.
40 CFR 63 Subpart QQQQQQ	Not an Area Source.
40 CFR 63 Subpart RRRRRR	Not an Area Source.
40 CFR 63 Subpart SSSSSS	Not an Area Source.
40 CFR 63 Subpart TTTTTT	Not an Area Source.
40 CFR 63 Subpart VVVVVV	Not an Area Source.
40 CFR 63 Subpart WWWWWW	Not an Area Source.
40 CFR 63 Subpart XXXXXX	Not an Area Source.
40 CFR 63 Subpart YYYYYY	Not an Area Source.
40 CFR 63 Subpart ZZZZZZ	Not an Area Source.
40 CFR 63 Subpart AAAAAAA	Not an Area Source.
40 CFR 63 Subpart BBBBBBB	Not an Area Source.
40 CFR 63 Subpart CCCCCCC	Not an Area Source.
40 CFR 63 Subpart DDDDDDD	Not an Area Source.
40 CFR 63 Subpart EEEEEEE	Not an Area Source.
40 CFR 63 Subpart HHHHHHH	No affected sources.
40 CFR 64, *Compliance Assurance Monitoring*	DOE has stated 40 CFR 64 does not apply to any emission unit at Hanford. The most recent emission calculations emissions inventory submitted by DOE supports this assertion.
40 CFR 72 through 40 CFR 78, Acid Rain Regulations	No affected sources.
40 CFR 79, *Registration of Fuels and Fuel Additives*	DOE does not manufacture or import fuel on the Hanford Site.
40 CFR 98, *Mandatory Greenhouse Gas Reporting*	Excluded by EPA rule from being considered an applicable requirement.

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