Discharge Point	Renewal 3 Name	Renewal 4 Name	DP Status for Renewal 4	AOP Revision Items
1.4.1	234-5Z, Boiler 1, 2, and 3 (>5 mmBTU/hr – Fuel Oil)	N/A - Removed	Retired	Item 28: 20-ESQ-0011 requests removal of DP 1.4.1 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.2	242-A, Boiler 1, 2, and 3 (>5 mmBTU/hr – Fuel Oil)	242-A, Boiler 1, 2, and 3 (>5 MMBtu/hr – Fuel Oil)	Active	Item 17: High/low pressure maintenance requirements for non-WTP boilers & DP 1.4.2 NSPS Dc fix Item 79: Addition of Method 202 for PM10 limits Item 86: Addition of NESHAP Subpart DDDDD for historical boilers General Item 9: Testing frequency clarifications General Item 17: Percent text to symbol. General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.3	318 Boiler (<5 mmBTU/hr – Natural Gas)	318 Boiler (<5 MMBtu/hr – Natural Gas)	Active	Item 19: Typos, less than/greater than on MMBtu/hr rating & NSPS Dc. Conditions also checked for consistency Item 86: Addition of NESHAP Subpart DDDDD for historical boilers General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.4	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.5	3709A Boiler (<5 mmBTU/hr – Natural Gas)	N/A - Removed	Retired	Item 70: Letter 23-ECD-0033 requests removal of 3709A Boiler, DP 1.4.5 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.6	324 Boiler 1 and Boiler 2(>5 mmBTU/hr – Natural Gas)	N/A - Removed	Retired	Item 64: Letter 23-ECD-0032 requests removal of DP 1.4.6 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.7	325 Boiler 1 and Boiler 2(>5 mmBTU/hr – Natural Gas)	325 Boiler 1 and Boiler 2 (>5 MMBtu/hr – Natural Gas)	Active	Item 17: High/low pressure maintenance requirements for non-WTP boilers & DP 1.4.2 NSPS Dc fix Item 19: Typos, less than/greater than on MMBtu/hr rating & NSPS Dc. Conditions also checked for consistency Item 79: Addition of Method 202 for PM10 limitsGeneral Item 9 - Test schedule clarification Item 86: Addition of NESHAP Subpart DDDDD for historical boilers General Item 9: Testing frequency clarifications General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.8	331 Boiler 1 and Boiler 2 (<5 mmBTU/hr – Natural Gas)	331 Boiler 1 and Boiler 2 (>5 MMBtu/hr – Natural Gas)	Active	Item 19: Typos, less than/greater than on MMBtu/hr rating & NSPS Dc. Conditions also checked for consistency Item 79: Addition of Method 202 for PM10 limits Item 86: Addition of NESHAP Subpart DDDDD for historical boilers General Item 9: Testing frequency clarifications General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.9	Portable Boiler (<5 mmBTU/hr – Dual Fuel)	N/A - Removed	Retired	Item 57: Letter 22-ECD-003782 requests removal of DP 1.4.9 Portable Boiler General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.10	E-225BC 001	225B-DG-1 Emergency Generator CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.11	E-225BG 001	225BG-GEN-1 Emergency Generator CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.12	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.13	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.14	CWC	CWC – Waste Storage Areas	Active	General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response. General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.15	Concrete Batch Plant	N/A - Removed	Retired	Item 20: 20-ECD-0042 requests removal of DP 1.4.15 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.16	E-282ED 001	E-282ED-001 Emergency Generator CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) General Item 9: Testing frequency clarifications General Item 17: Percent text to symbol.
1.4.17	E-282WD 001	E-282WD-001 Emergency Generator CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) General Item 9: Testing frequency clarifications General Item 17: Percent text to symbol.
1.4.18	Emergency Diesel Generators	300 Area Emergency Generator CI Engines	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 72: DP 1.4.18 issuance date correction and requirement clarification Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.19	P-2025E ETF	LERF Basins 41-44 & P-2025 ETF	Active	Item 39: DP 1.4.19 needs to be updated to DE07NWP-003, Revision 2 General Item 17: Percent text to symbol. General Item 22: Formatting/style and grammar consistency fixes
1.4.20	P-2706T 001	T Plant Complex Waste Storage Areas	Active	Item 40: Typo. "Analyze each proposed changed to determine..." General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response. General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.21	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.22	P-296W004 001	WRAP Storage Areas	Active	Item 85: Integration of DE03NWP-002, Amendment 1, into AOP
1.4.23	P-WTP-001	WTP – HLW, LAW, LAB, and BOF	Active	Item 68: Incorporating Revision 3 of DE02NWP-002 into the AOP & dangerous waste permit condition reference fix Item 80: Adding federal regulations for WTP: turbines (NSPS KKKK and NESHAP YYYY),engines (NESHAP ZZZZ), and boilers (NSPS Subpart Dc and NESHAP Subpart DDDDD) General Item 17: Percent text to symbol. General Item 22: Formatting/style and grammar consistency fixes
1.4.24	Integrated Disposal Facility (IDF)	IDF Retrievable Storage Landfill	Active	Item 69: Incorporation of DE05NWP-004, Rev. 2 General Item 22: Formatting/style and grammar consistency fixes
1.4.25	Ventilation Systems for 241-AN and 241AW-Tank Farms	Ventilation Systems for 241-AN Tank Farm	Active	Item 27: Incorporation of DE05NWP-001, Rev. 2, for AN Farm Exhausters (removal of AW) and consistency fixes General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response. General Item 17: Percent text to symbol. General Item 22: Formatting/style and grammar consistency fixes
1.4.26	200 Area SST Categorical Waste Retrieval	Ventilation Systems for SST Categorical Waste Retrieval	Active	Item 74: Addition of new discharge point for the 241-A Tank Farm & removal from other tank farms in DP 1.4.26 General Item 17: Percent text to symbol. General Item 22: Formatting/style and grammar consistency fixes
1.4.27	E-85 Fuel Station	E-85 Fuel Station	Active	General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response. General Item 13: Application Supplement revisions: CAM, SIC codes, E-85 Stage 1
1.4.28	HAMMER Training and Education Facility	HAMMER Training and Education Facility	Active	Item 78: Elimination of DP-specific comparisons to permitting thresholds/de minimis/ASIL values General Item 12: Updates for EPA removing WAC 173-400-107 from WA SIP without adding WAC 173-400-108 and -109 General Item 17: Percent text to symbol. General Item 22: Formatting/style and grammar consistency fixes General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.29	100B-181B/182B	181B and 182B Emergency CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines Item 78: Elimination of DP-specific comparisons to permitting thresholds/de minimis/ASIL values General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.30	WTP Heaters and Dehumidifiers	WTP Heaters and Dehumidifiers	Active	Item 78: Elimination of DP-specific comparisons to permitting thresholds/de minimis/ASIL values General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response. General Item 9: Testing frequency clarifications
1.4.31	300 Area/339A	N/A - Removed	Retired	Item 2: Requested removal from AOP General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.32	241-AP, 241-SY, and 241-AY/AZ Ventilation	Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms	Active	Item 67: Removal of 241-AP from DP for other exhausters, now covered by a separate DP 1.4.118 General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response. General Item 22: Formatting/style and grammar consistency fixes General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.33	Lagoon Treatment System	6608 Biosolids Treatment System	Active	Item 11: DE12NWP-001 Rev. 2 needs to be incorporated General Item 5: Converting WAC 173-460 TAP requirements to "State Only" for EPA petition response.
1.4.34	SST Retrieval Direct Fired Water Heaters	N/A - Removed	Retired	Item 42: Letter 20-ECD-0060 requests removal of SST Water Heaters, DP 1.4.34 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.35	Hanford Site Asbestos Landfill	Hanford Site Asbestos Landfill	Active	Item 38: Review of asbestos landfill and gasoline dispensing facility requirements for consistency with underlying regulations General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards General Item 27: Updating AOP requirements for WAC 173-400-040 (7) general standard for sulfur dioxide.
1.4.36	600 Area Gas Distribution	600 Area Gasoline Distribution (G-6290)	Active	Item 38: Review of asbestos landfill and gasoline dispensing facility requirements for consistency with underlying regulations General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards General Item 27: Updating AOP requirements for WAC 173-400-040 (7) general standard for sulfur dioxide.

1.4.37	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.38	100K Water Treatment Plant	100K Water Treatment Plant Emergency CI Engine at 189K	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions
1.4.39	385 Building	385 Building Emergency CI Engine	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.40	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.41	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.42	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.43	WTP MHF South-40 Laydown Critical Equipment Storage		Retired	Item 54: Letter 22-ECD-000159 requests removal of DP 1.4.43, 1.4.60, and 1.4.74 for Material Handling Facility engines General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.44	2720EA	2720EA Emergency Generator SI Engine	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.45	Rattle Snake Barricade	Rattlesnake Barricade Emergency Generator SI Engine	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 56: Engine Replacement at Rattlesnake and Wye Barricades, fixing Rattlesnake name Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.46	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.47	242-A	N/A - Removed	Retired	Item 23: 19-ECD-0057 requests removal of 1.4.47, 1.4.56, and 1.4.71 from the AOP. General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.48	234-5Z	N/A - Removed	Retired	Item 22: Ren. 3 comment A-2-73 requested removal of DP 1.4.48. Letter 20-ESQ-0010 confirms request. General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.49	400 Area	400 Area Emergency CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.50	600 Area Fire Station (Building 609A)	600 Area Fire Station Emergency Generator SI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.51	2721E	2721E Emergency Generator SI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.52	Yakima Barricade	Yakima Barricade Emergency Generator SI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.53	282-B	282B Emergency CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.54	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.55	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.56	TEDF Pump Station 2 (225E)	N/A - Removed	Retired	Item 23: 19-ECD-0057 requests removal of 1.4.47, 1.4.56, and 1.4.71 from the AOP. General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.57	WTP MHF South-40 Laydown Entry Gate (Light Tower)	WTP MHF South-40 Laydown Entry Gate Light Tower CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.58	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.59	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.60	WTP MHF South-40 Laydown Yard East X-Ray Tent	N/A - Removed	Retired	Item 54: Letter 22-ECD-000159 requests removal of DP 1.4.43, 1.4.60, and 1.4.74 for Material Handling Facility engines General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.61	WTP Construction Site Pretreatment Tower Crane	WTP Construction Site Pretreatment Tower Crane Emergency Generator CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.62	WTP Construction Site High-Level Waste Tower Crane	WTP Construction Site HLW Tower Crane Emergency Generator CI Engine	Active	Item 1: NESHAP Subpart ZZZZ fixes, except for DP 1.4.23 (See Item 80) and 1.4.73 (See Item 83) Item 75: NESHAP Subpart ZZZZ fixes (oil analysis program, non-emergency engines, startup time restrictions).
1.4.63	WTP Construction Site Building T-14	N/A - Removed	Retired	Item 62: Letter 23-ECD-001970 requests removal of DP 1.4.63 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.64	Light Towers Waste Transfer Corridor East	Waste Transfer Corridor East Light Tower CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.65	Light Towers Waste Transfer Corridor West	Waste Transfer Corridor West Light Tower CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 7: 17-ECD-0046 requested east be revised to west. Copy/paste problem in AOP. Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.66	Light Towers C Farm Trailer Area	C Farm Trailer Area Light Tower CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.67	Light Towers C Farm	C Farm Light Tower CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.68	AY/AZ Farm DMI-LT Light Tower	AY/AZ Farm DMI-LT Light Tower CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.69	Reserved	N/A - Removed	Retired	General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.70	Light Towers AN Farm	AN Farm Light Tower CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.71	200E Effluent Treatment Facility Engine	N/A - Removed	Retired	Item 23: 19-ECD-0057 requests removal of 1.4.47, 1.4.56, and 1.4.71 from the AOP General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.72	251W Substation Emergency Backup Engine	251W Substation Emergency Backup Generator SI Engine	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.73	WTP MHF South-40 Laydown Yard Laborers Tent	WTP MHF South-40 Laydown Yard Laborers Tent Light Tower/Generator CI Engine	Active	Item 83: DP 1.4.73 needs NESHAP Subpart ZZZZ oil analysis and idle/startup minimization language
1.4.74	WTP MHF South-40 Laydown Yard Warm-up/Cool-down Tent	N/A - Removed	Retired	Item 54: Letter 22-ECD-000159 requests removal of DP 1.4.43, 1.4.60, and 1.4.74 for Material Handling Facility engines General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.75	400 Area Water Treatment System Engines	400 Area Water System CI Engines	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.76	CWC Facility Existing Light Plant Engines	N/A - Removed	Retired	Item 65: Letter 23-ECD-0031 requests removal of DP 1.4.76, 1.4.77, and 1.4.78 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.77	CWC Facility New Light Plant Engines	N/A - Removed	Retired	Item 65: Letter 23-ECD-0031 requests removal of DP 1.4.76, 1.4.77, and 1.4.78 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.78	200 W SWOC Administrative Offices Engines	N/A - Removed	Retired	Item 65: Letter 23-ECD-0031 requests removal of DP 1.4.76, 1.4.77, and 1.4.78 General Item 32: Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
1.4.79	222S Engine for Direct Drive Ventilation	222S CI Engine for Direct Drive Ventilation	Active	Item 4: AOP engine updates for current DPs - Standardized language and various fixes/additions Item 76: Acknowledgement of NESHAP Subpart ZZZZ for NSPS Subpart IIII/JJJJ Engines
1.4.80	Effluent Management Facility	WTP Effluent Management Facility	Active	Item 25: Incorporation of DE16NWP-003, Rev. 1 for EMF General Item 22: Formatting/style and grammar consistency fixes General Item 26: Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
1.4.81	N/A - New in Renewal 4	High-Purge Operation of Rotary Core Tank Sampling System	New	Item 24: Incorporation of DE14NWP-001, high purge mode for the rotary core sampler.
1.4.82	N/A - New in Renewal 4	Ventilation Systems for 241-AW Tank Farm	New	Item 26: Incorporation of DE18NWP-001, AW Exhausters Stack Extension
1.4.83	N/A - New in Renewal 4	241-AX Tank Farm Area Light Plant CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.84	N/A - New in Renewal 4	AY-102 Control Trailer Area Light Plant & Generator CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.85	N/A - New in Renewal 4	Inter-Farm AX Access Area Light Plant & Generator CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.86	N/A - New in Renewal 4	Inter A-Farm Construction Area Light Plant & Generator CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.87	N/A - New in Renewal 4	Inter A-Farm Parking Area Light Plant CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.88	N/A - New in Renewal 4	Marshalling Yard Area Light Plant CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.89	N/A - New in Renewal 4	MO098, MO164, MO173, and MO174 Trailer Area Light Plant CI Engines	New	Item 10: 17-ECD-0049 request to add flexible engine DPs
1.4.90	N/A - New in Renewal 4	MO194 and MO195 Trailer Area CI Engines	New	Item 37: Letter 17-ECD-0049 requests addition of MO194 & MO195 engines. Later modified by Letter 20-ECD-0003.
1.4.91	N/A - New in Renewal 4	Wye Barricade Emergency Generator SI Engine	New	Item 56:Engine Replacement at Rattlesnake and Wye Barricades, fixing Rattlesnake name
1.4.92	N/A - New in Renewal 4	506BA Telecommunications Facility North Emergency Generator CI Engine	New	Item 30: Letter 17-ESQ-0096 request to add discharge points several emergency generator engines. Later modified by 20-ESQ-0035.
1.4.93	N/A - New in Renewal 4	182B Reservoir and Pump House Emergency Generator CI Engine	New	Item 30: Letter 17-ESQ-0096 request to add discharge points several emergency generator engines. Later modified by 20-ESQ-0035.
1.4.94	N/A - New in Renewal 4	200E Sewage Transfer System Main Lift Emergency Generator CI Engine	New	Item 14: 18-ESQ-0078 requests addition of DP
1.4.95	N/A - New in Renewal 4	273 Air Conditioning CI Engine	New	Item 35: Letter 20-ESQ-0028 requests addition of air conditioning engines
1.4.96	N/A - New in Renewal 4	2711EA Air Conditioner CI Engine	New	Item 35: Letter 20-ESQ-0028 requests addition of air conditioning engines
1.4.97	N/A - New in Renewal 4	2711EB Air Conditioner CI Engine	New	Item 35: Letter 20-ESQ-0028 requests addition of air conditioning engines
1.4.98	N/A - New in Renewal 4	L-895 200W Emergency CI Engine	New	Item 43: DE19NWP-001, Revision 1, Water System Incorporation (Multiple DPs)
1.4.99	N/A - New in Renewal 4	CPWTF Discharge to TEDF Lagoons	New	Item 43: DE19NWP-001, Revision 1, Water System Incorporation (Multiple DPs)
1.4.100	N/A - New in Renewal 4	CPWTF L-849 Sanitary Water Storage in 200 East	New	Item 43: DE19NWP-001, Revision 1, Water System Incorporation (Multiple DPs)
1.4.101	N/A - New in Renewal 4	CPWTF L-850 Sanitary Water Storage in 200 West	New	Item 43: DE19NWP-001, Revision 1, Water System Incorporation (Multiple DPs)
1.4.102	N/A - New in Renewal 4	Gable Mountain SI Engines – 6220 Building Backup	New	Item 52: Letter 21-ESQ-0005 requests addition of emergency engine at 622 Meteorological Tower (Building Backup)
1.4.103	N/A - New in Renewal 4	Gable Mountain SI Engines - Solar Array	New	Item 53: Letter 22-ECD-000046 requests addition of emergency engine, Gable Mountain East, solar array backup for Meteorological Tower

1.4.104	N/A - New in Renewal 4	2506E4 Telecommunications Building Emergency SI Engine	New	Item 29: 20-ESQ-0016 requests addition of 2506E4 Telecommunications Building emergency engine
1.4.105	N/A - New in Renewal 4	ETF Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.106	N/A - New in Renewal 4	LERF Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.107	N/A - New in Renewal 4	MO493 Trailer Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.108	N/A - New in Renewal 4	241-AY Farm Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.109	N/A - New in Renewal 4	241-AY Tank Farm Power Supply Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.110	N/A - New in Renewal 4	241-A Tank Farm Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.111	N/A - New in Renewal 4	241-AW Tank Farm Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.112	N/A - New in Renewal 4	241-AP Tank Farm North Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.113	N/A - New in Renewal 4	241-AP Tank Farm East Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.114	N/A - New in Renewal 4	241-SY Tank Farm Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.115	N/A - New in Renewal 4	222-S Laboratory Area CI Engines	New	Item 36: Letters 20-ECD-0003 and 24-ECD-0111 request addition of multiple flex engine groups around tank farms
1.4.116	N/A - New in Renewal 4	Ventilation Systems for 241-AP Tank Farm	New	Item 66: Addition of new DP for DE19NWP-003/241-AP
1.4.117	N/A - New in Renewal 4	Ventilation Systems for 241-A Tank Farm	New	Item 74: Addition of new discharge point for the 241-A Tank Farm & removal from other tank farms in DP 1.4.26
1.4.118	N/A - New in Renewal 4	225BC-PTS800 Air Compressor CI Engine	New	Item 16: 18-ESQ-0017 addresses new air compressor engine at Waste Encapsulation and Storage Facility
1.4.119	N/A - New in Renewal 4	WTP Construction Site T-52 Building Emergency SI Engine	New	Item 81: Letter 23-ECD-0095 requests addition of WTP Construction Site T-52 Building Emergency Engine
1.4.120	N/A - New in Renewal 4	TSCR HVAC Generator CI Engine	New	Item 87: Letter 24-ECD-0192 requests addition of HVAC engine for TSCR in 241-AP Tank Farm
1.4.121	N/A - New in Renewal 4	WTP MHF South-40 OE Tent Generator CI Engine	New	Item 60: Material Handling Facility Engine Updates

Item	File/Location in AOP	Description
Item 58	Attachment 1, Section 2.6	Removal of former contractor (JCI) reference in Attach 1, Section 2.6
General Item 3	All DPs	Updating DP names and descriptions to be more informative
General Item 4	All DPs	Addition of condition numbering
General Item 7	STGC; STGC SoB	Addition of 40 CFR Part 61, Subpart M, to STGC 5.25 and SoB discussion
General Item 8	STGC; STGC SoB	Addition of RMP to STGC 5.14, removal from Table 5-1 (Inapplicable Requirements)
General Item 10	STGC	Updating semiannual report content in STGC 5.6.2 to include required summaries of units in temporary shutdown
General Item 12	STGC; Attachment 1 DP 1.4.28	Updates to DP 1.4.28 and STGC 5.16 for EPA removing WAC 173-400-107 from WA SIP without adding WAC 173-400-108 and -109
General Item 13	Att. 1 DP 1.4.27; STGC 2.0 and Appendix A	Application Supplement revisions: CAM, SIC codes, E-85 Stage 1
General Item 14	STGC	Updating list of inapplicable requirements in STGC Table 5-1
General Item 15	STGC SoB; Attachment 1 SoB; Attachment 2 SoB; Attachment 3 SoB	Various text edits and corrections to Statements of Basis (SOBs)
General Item 16	STGC; Attachment 1, Table 1.1	Review inapplicability of WAC 173-400-060 (and other standards) in STGC Table 5-1
General Item 17	Attachment 1 SoB, Appendix B	Review of Insignificant Emission Units
General Item 19	STGC	Addition of NESHAP Subpart GGGGG to STGC 5.27
General Item 20	STGC 5.17; STGC SoB	WAC 173-446 and GHG changes in STGC 5.17 and STGC SoB
General Item 21	STGC SoB	Better clarification of AOP modification types in STGC SoB for 5.19 through 5.21
General Item 22	STGC; STGC SoB; Att. 1 SoB; Att. 1; Att. 2 SoB; Attach 3; Att. 2 SoB;	Formatting/style and grammar consistency fixes
General Item 23	Attach. 2, Add. A	Updates to Attachment 2, Addendum A
General Item 26	Att. 1, Sections 1.1, 2.1, and 2.8	Updating AOP requirements for WAC 173-400-040 (2) general opacity standards
General Item 27	Att. 1, Sections 1.1 and 2.7	Updating AOP requirements for WAC 173-400-040 (7) general standard for sulfur dioxide
General Item 28	Att. 1, Section 1.0; All DP	Creation of an abbreviation list at the start of Attachment 1 & updating abbreviation use
General Item 30	STGC	Updating New Source Review requirements in General Condition 5.22
General Item 31	Att. 1 SoB; STGC; STGC SoB	RCW Recodification Update
General Item 32	Att. 1, Section 1.4	Removal of blank "Reserved" pages for DPs and addition of a leading table of "Retired" DPs.
General Item 33	STGC 5.5.3	Addition of electronic reporting to EPA in General Condition 5.5.3
General Item 34	STGC; STGC SoB	DOE name update - RL and ORP to Hanford Field Office
General Item 35	STGC 5.9	Correcting Emissions Inventory Due Date and Language

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.1	234-5Z, Boiler 1, 2, and 3 (>5 mmBTU/hr – Fuel Oil)	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 28	1	DP removal.	Shutdown documented during Full Compliance Evaluation for federal fiscal years 2017-2020.	20-ESQ-0011
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.2	242-A, Boiler 1, 2, and 3 (>5 mmBTU/hr – Fuel Oil)	242-A, Boiler 1, 2, and 3 (>5 MMBtu/hr – Fuel Oil)	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 17	1	DP 1.4.2: Request submitted for biennual refractory inspections and cleaning of fireside surfaces/breaching for the two 700 BHP boilers at 242-A. Renewal 3 has annual maintenance for all three boilers.	AOP Renewal 0, Revision C, modified maintenance requirements to align them with WAC 296-104-100. This put refractory checks and cleaning as every 2 years for low pressure boilers and annual for power boilers. When the maintenance table was converted into conditions for Renewal 3, it appears there was an assumption that power boiler was the same as > 5 MMBtu/hr, which is the trigger for annual tune-ups and BACT in the approval order. Heat input and operating pressure are not necessarily linked. Based upon the 97NM-138 NOC Application, the two larger boilers are low pressure and should have biannual maintenance (excluding tune-ups). The smaller boiler is high pressure and everything should be annual. Additionally, DP 1.4.2 NSPS Dc citation should only apply to the two larger boilers. The 200 BHP boiler is less than the 10 MMBtu/hr threshold.	AOP 00-05-006 Renewal 0, Revision C; AOP 00-05-006 Renewal 2, Revision A, Attachment 1; 23-ECD-0092; 24-ECD-0002; DOE/RL 95-07 Supplement 1
Item 79	1	Addition of EPA Method 202 for condensibles in PM10 Limit	Particulate matter <10 microns should include condensables collected by Method 202, not just filterable particulate collected with Method 5. 2003 JCI "Compliance Determination Test Plan for Energy Savings Performance Contractor Boilers" (03-RCA-0275) included Method 202 for condensibles to demonstrate compliance with permit limits.	03-RCA-0275

Item 86	1	Addition of 40 CFR Part 63, Subpart DDDDD for historical boilers - DP 1.4.2	See Item 17, Change 1 regarding redline for change in timing for refractory inspection and cleaning of fireside surfaces. Boilers covered by Approval Order 97NM-138 predate the boiler MACT/NESHAP Subpart DDDDD. However, existing affected sources for which construction commenced prior to June 4, 2010, are subject as well. Ecology has previously identified that the WTP boilers are subject, but does not appear to have integrated requirements for the other other boilers. The Hanford Site is a major source for HAP and DP 1.4.2 boilers do not appear to qualify for exemptions as hot water heaters, residential boilers, or other categories of identified in 40 CFR 63.7491. DP 1.4.2 boilers use diesel fuel only, making them subject to Table 2 emission limits for subcategories 14 and 16 (liquid and light liquid) if they exceed 10 MMBtu/hr, which applies to Boilers 2 and 3. Table 3 tune-up requirements are equally or less restrictive than 97NM-138, so we can combine the requirements if the tune-ups are done in accordance with the NESHAP if we no longer call them state-only. If equipped with a continuous oxygen trim system, all three boilers would require tune-ups every 5 years. Without these systems, Boiler 1 would require tune-ups every 2 years (between 5 and 10 MMBtu/hr and light liquid) and Boilers 2/3 would require tune-ups annually (>10 MMBtu/hr and light liquid).	DOE/RL 95-07 Supplement 1
General Item 9	3	Modify test frequency for DP 1.4.2	A reference to WAC 173-400-105 (4) has been added when a test method is specified but there is no required testing schedule.	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	4	DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8: Removing WAC 173-400-040 (2) opacity limits which have been repeated in specific Attachment 1, Section 1.4, discharge points.	Attachment 1, Section 1.1, identifies that general standards of WAC 173-400-040 apply across the Hanford Site. Applicability of the general standards does not need to be repeated within the specific discharge points identified in Attachment 1, Section 1.4.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.3	318 Boiler (<5 mmBTU/hr – Natural Gas)	318 Boiler (<5 MMBtu/hr – Natural Gas)	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 26	4	DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8: Removing WAC 173-400-040 (2) opacity limits which have been repeated in specific Attachment 1, Section 1.4, discharge points.	Attachment 1, Section 1.1, identifies that general standards of WAC 173-400-040 apply across the Hanford Site. Applicability of the general standards does not need to be repeated within the specific discharge points identified in Attachment 1, Section 1.4. Approval order 97NM-138, including Amendment 1, do not identify opacity limits. Additionally, the DP 1.4.2 opacity limit does not have a condition date tied to approval order issuance. 40 CFR Part 60, Subpart Dc, does have opacity limits for certain boilers in 40 CFR 60.43c. However, none of these boilers exceeds a heat input capacity of 30 million British thermal units per hour. Additionally, the format of the opacity limitt is that of Ecology's Method 9A and WAC 173-400-040 (2) (i.e., no more than 3 minutes per hour exceeding 20% opacity).	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 19	12	Fixing 1.4.3 header.	Boiler is described as 30 hp in AOP, Rev. 2, Ren A, which matches the application for 97NM-138. Dc citation appears to be a clear copy/paste error	97NM-138 NOC Application

Item 86	2	Addition of 40 CFR Part 63, Subpart DDDDD for historical boilers - DP 1.4.3	Boilers covered by Approval Order 97NM-138 predate the boiler MACT/NESHAP Subpart DDDDD. However, existing affected sources for which construction commenced prior to June 4, 2010, are subject as well. Ecology has previously identified that the WTP boilers are subject, but does not appear to have integrated requirements for the other other boilers. The Hanford Site is a major source for HAP and DP 1.4.3 does not appear to qualify for exemptions as a hot water heater, residential boiler, or other category of identified in 40 CFR 63.7491. The 318 Boiler is identified as being 1.28 MMBTU/hr, which is less than the 1.6 MMBtu/hr threshold in the definition of hot water heater. However, this threshold explicitely states that it is for "not generating steam" and the 318 boiler has been identified as steam-generating. Table 2 emission limits do not apply, as natural gas is a gas 1 fuel and this boiler is less than 10 MMBtu/hr. Table 3 tune-up requirements are equally or less restrictive than 97NM-138, so we can combine the requirements if the tune-ups are done in accordance with the NESHAP if we no longer call them state-only. If equipped with a continuous oxygen trim system, boiler would require tune-ups every 5 years. Without this system, tune-ups are required every 2 years.	DOE/RL 95-07 Supplement 1
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.4	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.5	3709A Boiler (<5 mmBTU/hr – Natural Gas)	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 70	1	Boiler decomissioned	DP 1.4.5 to reserved. Inspected on 4/13/2023, at which time it was reported that removal was anticipated and that operation was seasonal (cold weather only). Letter 23-ECD-0033 stated operation ceased 11/7/2022.	23-ECD-0033
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.6	324 Boiler 1 and Boiler 2(>5 mmBTU/hr – Natural Gas)	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 64	1	Removal of boilers from AOP	Disconnection verified during 3/14/2023 inspection	23-ECD-0032
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.7	325 Boiler 1 and Boiler 2(>5 mmBTU/hr – Natural Gas)	325 Boiler 1 and Boiler 2 (>5 MMBtu/hr – Natural Gas)	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 17	6	1.4.7 maintenance review	Application for 97NM-138 identified these boilers as 100 BHP, 3.97 MMBTU/hr, low pressure. However, they have been consistently identified as 125 BHP in the AOP, dating back to the original AOP application (DOE/RL 95-07 Supplement 1). 97NM-138 identified 125 BHP boilers as 5.03 MMBTU/hr. AOP Renewal 0, Revision C, modified maintenance requirements for boilers to align them with WAC 296-104-100. This put refractory checks and cleaning as every 2 years for low pressure boilers and annual for power boilers. When the maintenance table was converted into conditions for Renewal 3, it appears there was an assumption that power boiler was the same as > 5 MMBtu/hr, which is the trigger for annual tune-ups and BACT in the approval order.	AOP 00-05-006 Renewal 0, Revision C; AOP 00-05-006 Renewal 2, Revision A, Attachment 1; 23-ECD-0092; 24-ECD-0002; DOE/RL 95-07 Supplement 1
Item 19	1	Removal of NSPS Subpart Dc for for 325 Boilers 1 and Boiler 2 (DP 1.4.7)	Boilers less than 10 MMBtu/hr are not subject to NSPS Subpart Dc, it appears the citation in the header was a paste error. AOP Ren. 2, Rev. A, tables 1.1 and 1.3 say these boilers are greater than 5 MMBtu/hr, but not subject to NSPS Subpart Dc. The 97NM-138 NOC application stated that these were 100 hp boilers, 84% efficient. This was later bumped up to 125 hp. The NOC rates 125 hp boilers as 83% efficient, which would put them just over 5 MMBtu/hr (84% would be under).	97NM-138 NOC Application
Item 79	1	Addition of EPA Method 202 for condensibles in PM10 Limit	Particulate matter <10 microns should include condensables collected by Method 202, not just filterable particulate collected with Method 5. 2003 JCI "Compliance Determination Test Plan for Energy Savings Performance Contractor Boilers" (03-RCA-0275) included Method 202 for condensibles to demonstrate compliance with permit limits.	03-RCA-0275

Item 86	3	Addition of 40 CFR Part 63, Subpart DDDDD for historical boilers - DP 1.4.7	See Item 17, Change 6 regarding redline for refractory inspection and cleaning of fireside surfaces. Application for 97NM-138 identified these boilers as 100 BHP, 3.97 MMBTU/hr, low pressure. However, they have been consistently identified as 125 BHP in the AOP, dating back to the original AOP application (DOE/RL 95-07 Supplement 1). 97NM-138 identified 125 BHP boilers as 5.03 MMBTU/hr. Boilers covered by Approval Order 97NM-138 predate the boiler MACT/NESHAP Subpart DDDDD. However, existing affected sources for which construction commenced prior to June 4, 2010, are subject as well. Ecology has previously identified that the WTP boilers are subject, but does not appear to have integrated requirements for the other other boilers. The Hanford Site is a major source for HAP and DP 1.4.7 does not appear to qualify for exemptions as a hot water heater, residential boiler, or other category of identified in 40 CFR 63.7491. NESHAP Subpart DDDDD, Table 2 emission limits do not apply, as natural gas is a gas 1 fuel and boilers are less than 10 MMBtu/hr. Table 3 tune-up requirements are equally or less restrictive than 97NM-138, so we can combine the requirements if the tune-ups are done in accordance with the NESHAP if we no longer call them state-only. If equipped with a continuous oxygen trim system, boiler would require tune-ups every 5 years. Without this system, tune-ups are required every 2 years.	DOE/RL 95-07 Supplement 1
General Item 9	5	Modify test frequency for DP 1.4.7	A reference to WAC 173-400-105 (4) has been added when a test method is specified but there is no required testing schedule.	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	4	DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8: Removing WAC 173-400-040 (2) opacity limits which have been repeated in specific Attachment 1, Section 1.4, discharge points.	Attachment 1, Section 1.1, identifies that general standards of WAC 173-400-040 apply across the Hanford Site. Applicability of the general standards does not need to be repeated within the specific discharge points identified in Attachment 1, Section	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.8	331 Boiler 1 and Boiler 2 (<5 mmBTU/hr – Natural Gas)	331 Boiler 1 and Boiler 2 (>5 MMBtu/hr – Natural Gas)	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 19	5	Status fix for 331 Boilers 1 and Boiler 2 (DP 1.4.8)	AOP Ren. 2, Rev. A, tables 1.1 and 1.3 say these boilers are greater than 5 MMBtu/hr, are subject to Dc. The application for 97NM-138 calls them 300 boiler hp with an efficiency of 82% (12.2 MMBtu/hr). Based upon this, the symbol in the header was incorrect.	97NM-138 NOC Application
Item 79	1	Addition of EPA Method 202 for condensibles in PM10 Limit	Particulate matter <10 microns should include condensables collected by Method 202, not just filterable particulate collected with Method 5. 2003 JCI "Compliance Determination Test Plan for Energy Savings Performance Contractor Boilers" (03-RCA-0275) included Method 202 for condensibles to demonstrate compliance with permit limits.	03-RCA-0275
Item 86	4	Addition of 40 CFR Part 63, Subpart DDDDD for historical boilers - DP 1.4.8	Boilers covered by Approval Order 97NM-138 predate the boiler MACT/NESHAP Subpart DDDDD. However, existing affected sources for which construction commenced prior to June 4, 2010, are subject as well. Ecology has previously identified that the WTP boilers are subject, but does not appear to have integrated requirements for the other other boilers. The Hanford Site is a major source for HAP and DP 1.4.8 does not appear to qualify for exemptions for hot water heaters, residential boilers, or other categories identified in 40 CFR 63.7491. NESHAP Subpart DDDDD, Table 2 emission limits do not apply, as natural gas is a gas 1 fuel. Table 3 tune-up requirements are equally or less restrictive than 97NM-138, so we can combine the requirements if the tune-ups are done in accordance with the NESHAP if we no longer call them state-only. If equipped with a continuous oxygen trim system, boiler would require tune-ups every 5 years. Without this system, tune-ups are required annually as these boilers are >10 MMBtu/hr.	DOE/RL 95-07 Supplement 1
General Item 9	6	Modify test frequency for DP 1.4.8	A reference to WAC 173-400-105 (4) has been added when a test method is specified but there is no required testing schedule.	N/A

General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	4	DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8: Removing WAC 173-400-040 (2) opacity limits which have been repeated in specific Attachment 1, Section 1.4, discharge points.	Attachment 1, Section 1.1, identifies that general standards of WAC 173-400-040 apply across the Hanford Site. Applicability of the general standards does not need to be repeated within the specific discharge points identified in Attachment 1, Section 1.4. Approval order 97NM-138, including Amendment 1, do not identify opacity limits. Additionally, the DP 1.4.2 opacity limit does not have a condition date tied to approval order issuance. 40 CFR Part 60, Subpart Dc, does have opacity limits for certain boilers in 40 CFR 60.43c. However, none of these boilers exceeds a heat input capacity of 30 million British thermal units per hour. Additionally, the format of the opacity limitt is that of Ecology's Method 9A and WAC 173-400-040 (2) (i.e., no more than 3 minutes per hour exceeding 20% opacity).	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.9	Portable Boiler (<5 mmBTU/hr – Dual Fuel)	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 57	1	Removal request	Inspected on 4/13/2023, removal discussed.	22-ECD-003782
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.10	E-225BC 001	225B-DG-1 Emergency Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	3	Addition of additional information for capacity for larger existing emergency engines (500+ hp) which are in AOP due to approval order conditions.	DP 1.4.10 and DP 1.4.11 - basing capacity on notes by Oliver Wang for 2007 inspections. DP 1.4.16 and DP 1.4.17 - capacity based upon discharge point table developed by former Ecology employee Lilyann Bauder. MFW 03/08/2024: Condition has been added to require maintaining exempt status for NESHAP Subpart ZZZZ or meeting applicable requirements. Technically, NESHAP Subpart ZZZZ does not require an hour meter for this category of engine (existing emergency engines >500 hp at a major source of HAP), but it does establish the requirement for smaller emergency engines which can't meet non-emergency standards in 40 CFR 63.6655(f)(1). Gap filling under WAC 173-401-615(1)(b) to the recordkeeping EPA requires to demonstrate smaller engines maintain emergency status.	02-RCA-051
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	5	DPs 1.4.10 and 1.4.11: Removing WAC 173-400-040 opacity and sulfur limits which have been repeated in specific Attachment 1, Section 1.4, discharge points.	Attachment 1, Section 1.1, identifies that general standards of WAC 173-400-040 apply across the Hanford Site. Applicability of the general standards does not need to be repeated within the specific discharge points identified in Attachment 1, Section 1.4.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.11	E-225BG 001	225BG-GEN-1 Emergency Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	3	Addition of additional information for capacity for larger existing emergency engines (500+ hp) which are in AOP due to approval order conditions.	DP 1.4.10 and DP 1.4.11 - basing capacity on notes by Oliver Wang for 2007 inspections. DP 1.4.16 and DP 1.4.17 - capacity based upon discharge point table developed by former Ecology employee Lilyann Bauder. MFW 03/08/2024: Condition has been added to require maintaining exempt status for NESHAP Subpart ZZZZ or meeting applicable requirements. Technically, NESHAP Subpart ZZZZ does not require an hour meter for this category of engine (existing emergency engines >500 hp at a major source of HAP), but it does establish the requirement for smaller emergency engines which can't meet non-emergency standards in 40 CFR 63.6655(f)(1). Gap filling under WAC 173-401-615(1)(b) to the recordkeeping EPA requires to demonstrate smaller engines maintain emergency status.	02-RCA-051
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	5	DPs 1.4.10 and 1.4.11: Removing WAC 173-400-040 opacity and sulfur limits which have been repeated in specific Attachment 1, Section 1.4, discharge points.	Attachment 1, Section 1.1, identifies that general standards of WAC 173-400-040 apply across the Hanford Site. Applicability of the general standards does not need to be repeated within the specific discharge points identified in Attachment 1, Section 1.4.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.12	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.13	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.14	CWC	CWC – Waste Storage Areas	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial

General Item 26	6	DP 1.4.14: Correcting WAC 173-400-040 (2) opacity limits which improperly cite EPA Method 9.	Approval Order DE00NWP-002, Revision 1, Approval Condition 1.2.1 states that visible emissions shall not exceed limits specified in WAC 173-400-040 (1), which was later shifted in a WAC revision to -040 (2). The associated AOP condition has already had the WAC citation corrected to the new location of the general standard. However, Approval Condition 1.3.2 identified EPA Method 9 as the method to demonstrate compliance when visible emissions are observed. EPA Method 9 does not provide enough information to demonstrate compliance with the general opacity standard. There is no indication that the requirement has been established for any reason except demonstrating compliance with the general standard. Therefore, the associated AOP condition has been corrected to require Ecology Method 9A.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.15	Concrete Batch Plant	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 20	1	Removal of DP	Concrete batch plant for construction of Waste Treatment and Immobilization Plant has been removed from the site, verified during full compliance evaluation for federal fiscal years 2020-2023.	20-ECD-0042
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.16	E-282ED 001	E-282ED-001 Emergency Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	3	Addition of additional information for capacity for larger existing emergency engines (500+ hp) which are in AOP due to approval order conditions.	DP 1.4.10 and DP 1.4.11 - basing capacity on notes by Oliver Wang for 2007 inspections. DP 1.4.16 and DP 1.4.17 - capacity based upon discharge point table developed by former Ecology employee Lilyann Bauder. MFW 03/08/2024: Condition has been added to require maintaining exempt status for NESHAP Subpart ZZZZ or meeting applicable requirements. Technically, NESHAP Subpart ZZZZ does not require an hour meter for this category of engine (existing emergency engines >500 hp at a major source of HAP), but it does establish the requirement for smaller emergency engines which can't meet non-emergency standards in 40 CFR 63.6655(f)(1). Gap filling under WAC 173-401-615(1)(b) to the recordkeeping EPA requires to demonstrate smaller engines maintain emergency status.	02-RCA-051
General Item 9	12	Modify test frequency for DP 1.4.16	A reference to WAC 173-400-105 (4) has been added when a test method is specified but there is no required testing schedule. Additionally, test frequency was not properly marked for Method 9.	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.17	E-282WD 001	E-282WD-001 Emergency Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	3	Addition of additional information for capacity for larger existing emergency engines (500+ hp) which are in AOP due to approval order conditions.	DP 1.4.10 and DP 1.4.11 - basing capacity on notes by Oliver Wang for 2007 inspections. DP 1.4.16 and DP 1.4.17 - capacity based upon discharge point table developed by former Ecology employee Lilyann Bauder. MFW 03/08/2024: Condition has been added to require maintaining exempt status for NESHAP Subpart ZZZZ or meeting applicable requirements. Technically, NESHAP Subpart ZZZZ does not require an hour meter for this category of engine (existing emergency engines >500 hp at a major source of HAP), but it does establish the requirement for smaller emergency engines which can't meet non-emergency standards in 40 CFR 63.6655(f)(1). Gap filling under WAC 173-401-615(1)(b) to the recordkeeping EPA requires to demonstrate smaller engines maintain emergency status.	02-RCA-051
General Item 9	13	Modify test frequency for DP 1.4.17	A reference to WAC 173-400-105 (4) has been added when a test method is specified but there is no required testing schedule. Additionally, test frequency was not properly marked for Method 9.	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.18	Emergency Diesel Generators	300 Area Emergency Generator CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	3	Addition of additional information for capacity for larger existing emergency engines (500+ hp) which are in AOP due to approval order conditions.	DP 1.4.10 and DP 1.4.11 - basing capacity on notes by Oliver Wang for 2007 inspections. DP 1.4.16 and DP 1.4.17 - capacity based upon discharge point table developed by former Ecology employee Lilyann Bauder. MFW 03/08/2024: Condition has been added to require maintaining exempt status for NESHAP Subpart ZZZZ or meeting applicable requirements. Technically, NESHAP Subpart ZZZZ does not require an hour meter for this category of engine (existing emergency engines >500 hp at a major source of HAP), but it does establish the requirement for smaller emergency engines which can't meet non-emergency standards in 40 CFR 63.6655(f)(1). Gap filling under WAC 173-401-615(1)(b) to the recordkeeping EPA requires to demonstrate smaller engines maintain emergency status.	02-RCA-051
Item 72	3	Combining redundant and confusing requirements by folding recordkeeping condition into emission limit condition.	The AOP already identifies that records need to be kept for 60 months and provided upon request. The records were named in the approval order to allow for verifying emissions. Therefore, it makes more sense to have these in the "Required Records" for the emission limits, rather than having a separate condition saying records are necessary. Additionally, DE02NWP-001 was issued under a significantly different version of Chapter 173-400 WAC. The conditions regarding evaluation against permitting thresholds have not been rescinded, but should be evaluated to the thresholds of the time. These conditions also can't override the potential for a project to trigger NSR under current WAC. The AOP condition has been clarified to identify that projects must be evaluated for compliance with the approval order and current regulations.	N/A

Item 72	4	Issuance Date for DE02NWP-001 is unclear.	AOP Renewal 3 identifies the issuance date of the original approval order as 1/15/2002. However, the signature page states that the order is dated 1/9/2002. The transmittal letter and order footer both list 1/15/2002. Additionally, a peer review form with notes dated 1/15/2002 was included with the transmitted order. Based upon this, and Ecology practice of signing the transmittal letter and approval order on the same date, it appears that the order was finalized on 1/15 but the signature page date was not updated. To acknowledge this, Ecology is updating the citation for DE05NWP-001 to identify 1/15/2002 as the "Actual Finalization Date" and 1/9/2002 as the "Signature Page Date."	N/A
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.19	P-2025E ETF	LERF Basins 41-44 & P-2025 ETF	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 39	1	DE07NWP-003, Revision 2, incorporation	Updated approval order conditions are incorporated into the AOP.	DE07NWP-003, Revision 2

General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.20	P-2706T 001	T Plant Complex Waste Storage Areas	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 40	1	Obvious typo fix, "Analyze each proposed changed to determine…"	Revised text to "change"	N/A

General Item 26	9	DP 1.4.20: Correcting WAC 173-400-040 (2) opacity limits which improperly cite EPA Method 9.	Approval Order DE01NWP-002, Revision 1, Approval Condition 1.2.1 states that visible emissions will not exceed limits specified in WAC 173-400-040 (1), which was later shifted in a WAC revision to -040 (2). The associated AOP condition has already had the WAC citation corrected to the new location of the general standard. However, Approval Condition 1.3.2 identified EPA Method 9 as the method to demonstrate compliance when visible emissions are observed. EPA Method 9 does not provide enough information to demonstrate compliance with the general opacity standard. There is no indication that the requirement has been established for any reason except demonstrating compliance with the general standard. Therefore, the associated AOP condition has been corrected to require Ecology Method 9a.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.21	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.22	P-296W004 001	WRAP Storage Areas	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 85	1	AOP inclusion of DE03NWP-002, Amendment 1	Amendment 1 was transmitted 6/29/2006 to modify TAP and VOC calculations but was not specifically addressed in Renewal 3.	

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.23	P-WTP-001	WTP – HLW, LAW, LAB, and BOF	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 68	1	Incorporation of DE02NWP-002, Revision 3, for the Waste Treatment and Immobilization Plant (WTP).	DE02NWP-002, Revision 3, updated TAP estimates for the Low Activity Waste and Laboratory portions of WTP and identified that the wet control devices would be primarily responsible for the required reduction in acid gas emissions, such as hydrogen chloride and hydrogen fluoride. This approval order specifically did not update requirements for portions of WTP which were not part of the project triggering New Source Review.	DE02NWP-002, Revision 3; Email - Potential Issue with DE02NWP-002, Revision 3, Condition 3.2
Item 68	2	Dangerous waste condition update	Can likely do this as gap filling/correction, even without doing a Revision 4. Confirmed via email with permittees. If we get out a Revision 3 we can potentially remove the email as the reference and just update for that issuance (see Item 3 below).	DE02NWP-002, Revision 3; Email - Potential Issue with DE02NWP-002, Revision 3, Condition 3.2

Item 68	4	Consistency fixes for opacity limits	AOP opacity conditions have been combined to be more consistent with the underlying approval order, which sets 5% opacity limits for "Each Pretreatment, HLW and LAW process off-gas exhaust stack" in Condition 1.1.2 and 10% opacity limits for "Exhaust stacks from the boilers, emergency turbine generators, emergency diesel generator, and diesel fire pumps" in Condition 1.1.3. In AOP Renewal 3, this was split into three different AOP conditions with potentially confusing applicability: "Opacity from each Pretreatment, HLW, and LAW process off-gas exhaust stack shall not exceed 5%." "Opacity from each (Pretreatment, HLW, and LAW) process off-gas stack shall not exceed 5%." "Opacity from each exhaust stack from process facilities (Pretreatment, HLW, and LAW) shall not exceed 5%, other facility stacks shall not exceed 10 percent"	DE02NWP-002, Revision 3; Email - Potential Issue with DE02NWP-002, Revision 3, Condition 3.2
Item 80	1	Addition of Turbine Requirements - 40 CFR Part 60, Subpart KKKK, and 40 CFR Part 63, Subpart YYYY	The DE02NWP-002, Revision 2, application submitted with Letter 12-ECD-0051 identified the planned addition of 2 emergency turbines rated at 3,800 kilowatts each. 40 CFR Part 60, Subpart KKKK, applies to stationary combustion turbines with a heat input capacity of 10 million British thermal units per hour or more. Even without considering efficiency, the rated power output of each turbine exceeds this threshold. Therefore, the turbines will be subject. Subpart KKKK regulates nitrogen oxides and sulfur dioxide, but 60.4310 (a) states that emergency combustion turbines are exempt from the nitrogen oxides limit. Therefore, the nitrogen oxide requirements do not need to be incorporated into the AOP if the turbines remain emergency. For sulfur dioxide, one method of demonstrating compliance is for the current fuel contract, tariff sheet, or transportation contract to document less than 0.05 weight percent sulfur. There is already a more stringent requirement from PSD-02-01, Condition 17.3, to fire only ultra-low sulfur diesel (ULSD, at most 0.0015 weight percent sulfur) in the turbines. This is addressed in the AOP already. 40 CFR 60.4333 (a) has requirements to operate and maintain turbines in a manner consistent with good air pollution control practices at all times. It makes sense to incorporate both this requirement, similar to how stationary engines will be treated, and include the requirement to maintain emergency status. 40 CFR Part 63, Subpart YYYY, has a near-complete exemption for new emergency turbines at major soruces of HAP in 40 CFR 63.6090 (b)(1)(i), requiring only an initial notification.	

Item 80	2	Addition of Engine Requirements - 40 CFR Part 60, Subpart ZZZZ for standby generators	The two standby generators are >500 bhp, existing emergency, and located at a major source of HAP and therefore have a nearly complete exemption from Subpart ZZZZ while they maintain emergency status. The fire pump engines are < 500 bhp, existing emergency, and located at a major source of HAP. Therefore, they do have specific maintenance requirements which should be addressed like the other smaller existing emergency engines.	
Item 80	3	Addition of Boiler Requirements, 40 CFR Part 60, Subpart Dc	NSPS Subpart Dc sets limits on sulfur dioxide, particulate matter, and opacity. For boilers firing oil, which includes diesel fuel, there is no particulate matter limit for boilers constructed/reconstructed/modified on or before February 28, 2005. The WTP boilers were manufactured in 2004 and have not been reconstructed or modified in a manner which triggers applicability of the particulate matter limit. Limiting fuel sulfur content is an alternative to both the sulfur dioxide emission limit [40 CFR 60.42c(d)] and, if it were to apply, the particulate matter emission limit [40 CFR 60.42c(e)(4)]. DE02NWP-002 and the AOP require use of ULSD, which is more stringent than the 0.5% wt. threshold for NSPS Subpart Dc. Use of ULSD also eliminates the need for a continuous opacity monitoring system [40 CFR 60.47c(c)], but does not not eliminate the 20% opacity limit or need to regularly conduct Method 9 readings in accordance with 40 CFR 60.47c(a)(1). DE02NWP-002 sets a more stringent 10% opacity limit on the WTP boilers, but did not establish a frequency for Method 9 readings. The AOP requires Method 9 quarterly to demonstrate compliance with the 10% opacity limit, which matches the NSPS Subpart Dc frequency if opacity is greater than 5% but less than or equal to 10% [40 CFR 60.47c(a)(1)(iv)]. When in compliance with the AOP condition, the permittee would be in compliance with both the approval order and federal regulations. For recordkeeping and reporting, AOP Renewal 3 requires a fuel certification from the supplier which would satisfy 40 CFR 60.48c(f)(1). But there is no explicit requirement	

Item 80	4	Addition of Boiler Requirements, 40 CFR Part 63, Subpart DDDDD	NESHAP Subpart DDDDD sets limits on hydrogen chloride (HCl), mercury, carbon monoxide (CO) and filterable particulate matter/total selected metals (TSM). The boilers were constructed prior to June 4, 2010, and have not been reconstructed. This makes them subject to the limits in Table 2, Subcategory 14 (units designed to burn liquid fuel) and 16 (units designed to burn light liquid fuel). It appears that all limits can be complied with by either stack testing annually or stack testing once and using ultra-low sulfur liquid fuel. Depending upon the exact circumstances, compliance with the HCl, mercury, and TSM limits can be demonstrated through fuel analysis as well. Continuous monitors are not installed on the boilers and would likely never be cost effective, therefore they likley don't need to be addressed as an option in the conditions.	
General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.24	Integrated Disposal Facility (IDF)	IDF Retrievable Storage Landfill	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 69	1	Integration of DE05NWP-004, Revision 2	Updated approval order conditions integrated into DP 1.4.24	DE05NWP-004, Revision 2; DE05NWP-004.
General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.25	Ventilation Systems for 241-AN and 241AW-Tank Farms	Ventilation Systems for 241-AN Tank Farm	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 27	1	Header Update	Rev. 2 is now the only active AO and 241-AW is a separate DP with a standalone approval order.	DE05NWP-001, Revision 2
Item 27	2	Update second condition to "system" for consistency	For clarity, using "ventilation system" throughout this DP now. There is some confusion in the AO because it historically used "systems" to describe ventilation for a single farm in some places, likely due to dual train operation.	DE05NWP-001, Revision 2
Item 27	3	Update third condition for new TAP limit, tBACT consistency, etc.	Adding Rev. 2 to the the "Condition Approval." Retaining the dates for Rev. 1 and Amend. A because they set TAP limits which were not based upon WAC 173-460. These limits were source-specific and not reviewed/updated for issuance of Revision 2. Period after Amd. and commas before Rev. were previously missing. Inconsistent with the rest of the permit and our general approach. The tBACT abbreviaton to be consistent with WAC and "exhauster systems" was updated to "exhausters" to cover single system with dual exhauster trains in 241-AN.	DE05NWP-001, Revision 2
Item 27	4	Update fourth condition to remove AW.	Comma/period consistency and "exhauster systems" text was fixed, see Item 27 Change #3 notes.	DE05NWP-001, Revision 2

Item 27	5	Condition 5 tBACT consistency	Abbreviation for tBACT updated.	DE05NWP-001, Revision 2
Item 27	6	Addition of 1,3-dichloropropene limit and sampling	Sampling only triggered if waste is transferred from 241-AP to 241-AN.	DE05NWP-001, Revision 2
General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial

General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.26	200 Area SST Categorical Waste Retrieval	Ventilation Systems for SST Categorical Waste Retrieval	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 74	1	Removal of 241-A from DP 1.4.26	The 241-A Tank Farm is no longer covered by DE23NWP-002, Revision 3, and has been removed from DP 1.4.26. It is now covered by a separate approval order and a new DP 1.4.124. Previously, the Requirement Citation identified WAC 173-400-040(2) and all three previous issuances of DE05NWP-002 (Rev. 0, Rev. 1, and Rev. 2). This was confusing, as there were no requirements for the general opacity standard in DP 1.4.26 and only one version of the approval order (Revision 2) was active. The citation has been cut down to just the active approval order. Additionally, citations directly to the text of DE05NWP-002 have been updated to Revision 3. However, "Condition Approval" dates and issuance citations have not been updated because none of the conditions have been significantly updated since the previous approval.	DE05NWP-002, Revision 3; DE05NWP-002, Revision 3 TSD; DE23NWP-001, Revision 1; DE23NWP-001 TSD
General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A

General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.27	E-85 Fuel Station	E-85 Fuel Station	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 13	3	Addition of WAC 173-491 for E-85 Operation (DP 1.4.27)	E-85 system (DP 1.4.27) has a separate dispensing station from the non-E85 system (DP 1.4.36). Both would have the requirement to have State 1 vapor recovery under WAC 173-491, but Renewal 3 only specifically identified it in DP 1.4.36.	24-ECD-0195; email "RE: AOP Renewal 4 Application Supplement, DOE/RL 2024 24"; email "Hanford Site 200E Area Fuel Station_ Potential To Emit"
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A

General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial
General Item 13	3	Addition of WAC 173-491 for E-85 Operation (DP 1.4.27)	E-85 system (DP 1.4.27) has a separate dispensing station from the non-E85 system (DP 1.4.36). Both would have the requirement to have State 1 vapor recovery under WAC 173-491, but Renewal 3 only specifically identified it in DP 1.4.36.	24-ECD-0195; email "RE: AOP Renewal 4 Application Supplement, DOE/RL 2024 24"; email "Hanford Site 200E Area Fuel Station_ Potential To Emit"

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.28	HAMMER Training and Education Facility	HAMMER Training and Education Facility	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 78	2	1.4.28 - Eliminating conditions from approval orders which identified New Source Review (NSR) permitting thresholds when the project potential to emit was actually less than these thresholds.	These conditions were based upon a previous version of WAC 173-400-110. These pollutants did not trigger NSR and, therefore, Ecology did not have direct authority to review emissions and set limits. Particularly limits which were significantly greater than project potential to emit. Identifying the permitting thresholds potentially allows for a violation of current WAC 173-400-110 if a modification occurs. For a modification, the pre-project and post-project potential to emit should be compared. Using the permitting threshold for the previous analysis would appear to authorize a greater increase in emissons than is actually allowable under current WAC.	
General Item 12	2	Remove -107 and add -108 & -109 for DP 1.4.28	Current Ecology guidance is that WAC 173-400-107 is no longer in effect and that WAC 173-400-108 and -109 apply, but state-only.	N/A

General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 22	14	Percent (text) vs % (symbol) consistency	There was a roughly even split of text and symbol use for percent in text. Standardized to the use of %, as it is easier to pick out limits visually and appears to be handled properly by screen readers.	N/A
General Item 26	14	1.4.28: Consideration of opacity limit	Approval Order DE07NWP-001 Approval Condition 1.2.1 states that visible emissions shall not exceed 20% with a WAC 173-400-040 (1) citation. At the time, this was the general opacity standard which was later shifted in a WAC revision to -040 (2). The associated AOP condition has already had the WAC citation corrected to the new location of the general standard. Approval Condition 1.3.2 cites AOP Tier 2 for compliance. Tier 2 is being retired because it was confusing and only used in a few discharge points. It also set a schedule of testing wich did not match the requirements of DE07NWP-001. The approval order just states that visible emission surveys must be done when visible emisions are present, it doesn't establish a "once per year" requirement at all. Additionally, the approval order specifically states that results must be sent to Ecology under WAC 173-400-107. -107 is now retired and was potentially inappropriate at the time, because the limit is 20% opacity and surveys are triggered on any opacity. However, the requirement to report results itself appears to be valid. The AOP condition specifically states EPA Method 9, which is not the appropriate method for WAC 173-400-040 (2) and is not mentioned in the underlying approval order. This has been corrected to more generic "visual opacity determination" to match the new format of Section 2.1.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.29	100B-181B/182B	181B and 182B Emergency CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	3	IIII Engines - DP 1.4.29 header update and standardized NSPS Subpart IIII conditions	Conditions for NSPS Subpart IIII engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	

Item 78	3	1.4.29 - Eliminating conditions from approval orders which identified New Source Review (NSR) permitting thresholds when the project potential to emit was actually less than these thresholds.	These conditions were based upon a previous version of WAC 173-400-110. These pollutants did not trigger NSR and, therefore, Ecology did not have direct authority to review emissions and set limits. Particularly limits which were significantly greater than project potential to emit. Identifying the permitting thresholds potentially allows for a violation of current WAC 173-400-110 if a modification occurs. For a modification, the pre-project and post-project potential to emit should be compared. Using the permitting threshold for the previous analysis would appear to authorize a greater increase in emissons than is actually allowable under current WAC.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	15	1.4.29: Removal of opacity limit which is less stringent than WAC 173-400-040 (2)	DE07NWP-002, Revision 2, Approval Condition 1.2.1 has multiple opacity limits based upon acceleration mode, lugging mode, and peak in either acceleration or lugging mode (20%, 15%, and 50% respectively). The 50% limit is less stringent than the WAC 173-400-040 (2) general opacity standard, which is addressed in AOP Attachment 1, Table 1.1 and Section 2.1. The less stringent limit has therefore been removed.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.30	WTP Heaters and Dehumidifiers	WTP Heaters and Dehumidifiers	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 78	4	1.4.30 - Eliminating conditions from approval orders which identified New Source Review (NSR) permitting thresholds when the project potential to emit was actually less than these thresholds.	These conditions were based upon a previous version of WAC 173-400-110 and WAC 173-460. It's better to remove the WAC requirement citations and just point to the approval order as the current source of these requriements. Additionally, with the exception of NOx, criteria pollutants did not trigger NSR to begin with. Ecology did not have direct authority to set limits. Particularly limits which were significantly greater than project potential to emit. Identifying the permitting thresholds potentially allows a violation of current WAC 173-400-110 if a modification occurs. For a modification, the pre-project and post-project potential to emit should be compared. Using the permitting threshold for the previous analysis would appear to authorize a greater increase in emissons than is actually allowable under current WAC.	

General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial
General Item 9	15	Modify test frequency for DP 1.4.30	Testing does have a frequency, so "Not specified" is inappropriate. However, frequency is variable, depending upon the previous observations (described in Periodic Monitoring).	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.31	300 Area/339A	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 2	1	Discharge point removal.	15-ESQ-0099 requested replacing NOC conditions with NSPS IIII limits. 20-ESQ-0027 later requested removal. Disconnection verified on 8/4/2022 inspection.	15-ESQ-0099; 20-ESQ-0027
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.32	241-AP, 241-SY, and 241-AY/AZ Ventilation	Ventilation Systems for 241-SY and 241-AY/AZ Tank Farms	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 67	1	Revision of DP 1.4.32 to remove 241-AP references	DE19NWP-003 now covers 241-AP, revoking the requirements of DE11NWP-001, Rev. 4, for this tank farm specifically. The other tank farms were untouched, so the only necessary change is removing references to 241-AP. 241-AP is now under DP 1.4.123.	DE19NWP-003; DE19NWP-003 TSD
General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial

General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 26	17	1.4.32: Consideration of opacity limit	Opacity condition has been updated to be clearer that observing opacity triggers the requirement to do a single Method 9 test. The previous condition could be interpreted that there is a separate schedule/frequency of testing which applies when visible emissions are observed. This condition was not updated to be consistent with WAC 173-400-040 (2) because the underlying requirement is different. DE11NWP-001, Revision 4, Approval Condition 1.2.1 has a 5% opacity limit. Compliance for the 5% opacitity limit is specifically identified as EPA Method 9 in Approval Condition 1.3.2. WAC 173-400-040 (2) is a 20% opacity limit determined by Ecology Method 9A.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.33	Lagoon Treatment System	6608 Biosolids Treatment System	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 11	1	Incorporation of DE12NWP-001, Revision 2	New approval order adds additional sampling. Calculation Model 11 was also added to the Attachment 1 Statement of Basis for hydrogen sulfide.	DE12NWP-001, Revision 2 & TSD; 17-ESQ-0084

General Item 5	1	Ensure state-only requirements properly marked throughout the AOP.	EPA clearly identified that WAC 173-460 is a state program that has not been added to the SIP and is therefore not federally enforceable, see petition response for X-2019-8 (page 13, footnote 17). The following conditions should be updated to properly identify state-only requirements: DP 1.4.14 - ASIL limit DP 1.4.20 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. DP 1.4.25 - new TAP identification. DP 1.4.27 - clarification that VOC is federally enforceable (VOC is part of SIP) but ASILs are state-only. Similar to DP 1.4.18. 1.4.30 - TAP limits are state only. DP 1.4.32 - TAP limits (ammonia, DMM, NDMA, etc.). Particulate control requierments were established out of tBACT, not BACT, and PM doesn't triggering NSR for tanks. The final condition should be state only as well because EPA wouldn't be able to enforce upon a requirement placed under WAC 173-460. 1.4.33 - ASILs	Petition X-2019-8 Denial

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.34	SST Retrieval Direct Fired Water Heaters	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 42	1	Removal of DP for SST Water Heaters	Notes for 2017-2020 inspection cycle note that power was reported as disconnected 6/27/2018 and that the last time it was operated was 10/10/2017 for Method 9 testing.	20-ECD-0060
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.35	Hanford Site Asbestos Landfill	Hanford Site Asbestos Landfill	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 38	1	Review of other 1.4.35 conditions for accuracy	Condition grammar and language tweaked slightly better to function as an AOP condition, rather than a CFR subpart. Additionally, notifications are required for disturbance of waste by activities that aren't excavation and control procedures are required for the entire process to ultimate disposal if the waste is moved.	WAC 173B (2007 Historical WAC 173-400-040)
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	18	1.4.35: Consideration of WAC 173-400-040 (2) citation/condition with no specific mention of 20% limit.	Removing citation and condition for general opacity standard. AOP condition states that Permittee is considered to be in compliance with general opacity standard if there are no complaints. Table 1.1 and Section 2.7, Tier 3, already cover this requierment with no additional condition. The condition was also likely inappropriate affirmative defense. It potentially made it difficult to enforce if we see opacity without a complaint.	N/A
General Item 27	2	Removal of WAC 173-400(7) reqs from 1.4.35 header and conditions	This condition is redundant with the change to Table 1.1 and the text in Section 2.7, Tier 2.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.36	600 Area Gas Distribution	600 Area Gasoline Distribution (G-6290)	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 38	2	Review of other 1.4.36 conditions for accuracy	WAC 173-491-040(6)(b)(iii) has been added to the AOP. DP 1.4.36 covers a gasoline dispensing facility with a vapor collection system required by WAC 173-491-040(b), which meets the applicability definitions. Previously, the requirements of Chapter 173-491 WAC were identified as being federally enforceable. However, this chapter is not part of the EPA-approved State Implementation Plan for Ecology. Based upon this, the conditions in DP 1.4.36 are now listed as state-only.	WAC 173B (2007 Historical WAC 173-400-040)
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A
General Item 26	19	1.4.36: Consideration of WAC 173-400-040 (2) citation/condition with no specific mention of 20% limit.	Removing citation and condition for general opacity standard. AOP condition states that Permittee is considered to be in compliance with general opacity standard if there are no complaints. Table 1.1 and Section 2.7, Tier 3, already cover this requierment with no additional condition. The condition was also likely inappropriate affirmative defense. It potentially made it difficult to enforce if we see opacity without a complaint.	N/A
General Item 27	3	Removal of WAC 173-400(7) reqs from 1.4.36 header and conditions	This condition is redundant with the change to Table 1.1 and the text in Section 2.7, Tier 2.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.37	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.38	100K Water Treatment Plant	100K Water Treatment Plant Emergency CI Engine at 189K	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	4	IIII Engines - 1.4.38 header update and standardized NSPS Subpart IIII conditions	Conditions for NSPS Subpart IIII engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.39	385 Building	385 Building Emergency CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	5	IIII Engines - 1.4.79 header update and standardized NSPS Subpart IIII conditions	Conditions for NSPS Subpart IIII engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.40	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.41	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.42	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.43	WTP MHF South-40 Laydown Critical Equipment Storage	0	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 54	1	Removal of DP 1.4.43	Removal confirmed through full compliance evaluation for 2020-2023 federal fiscal years.	22-ECD-000159
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.44	2720EA	2720EA Emergency Generator SI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	7	JJJJ Engines - 1.4.44 and 1.4.45 header update and standardized NSPS conditions	Conditions for NSPS Subpart JJJJ engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.45	Rattle Snake Barricade	Rattlesnake Barricade Emergency Generator SI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	7	JJJJ Engines - 1.4.44 and 1.4.45 header update and standardized NSPS conditions	Conditions for NSPS Subpart JJJJ engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 56	1	Updates for DP 1.4.45 - "Rattle Snake" to "Rattlesnake"	DOE documents, including 20-ESQ-0035, consistently use "Rattlesnake Barricade."	20-ESQ-0035
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.46	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.47	242-A	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 23	1	Remove 1.4.47 Discharge Point 242-A Evaporator from permit. Basis for change: Engine is no longer needed and has been removed from service.	Physical inspection was planned for March 2020, converted to records-only inspection due to COVID. Permittee confirmed that the engine was permanently shut down in 2017, when it had been removed from the dangerous waste permit. Physical removal of engine and fuel tank was planned once site was returned to service. This documentation was found to be sufficient for DP removal, based upon EPA enforcement policy authorizing suspension of physical inspections during COVID health emergency and continued inspection of the facility for the dangerous waste permit.	19-ECD-0057; 20-NWP-004
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.48	234-5Z	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 22	1	Removal of 1.4.48	20-ESQ-0010 states this engine was for the 234-5Z Boiler Annex and that this annex has been closed. 234-5Z was the main processing facility for PFP, which has started undergoing demolition and removal in 2017. Daniel Heuston received an email (12/10/2019) and documentation that services have be terminated for this building and that the engine will never be used again as part of the federal fiscal years 2017-2020 inspection cycle. Sufficient for removal.	20-ESQ-0010
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.49	400 Area	400 Area Emergency CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.50	600 Area Fire Station (Building 609A)	600 Area Fire Station Emergency Generator SI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.51	2721E	2721E Emergency Generator SI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.52	Yakima Barricade	Yakima Barricade Emergency Generator SI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.53	282-B	282B Emergency CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.54	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.55	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.56	TEDF Pump Station 2 (225E)	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 23	2	Remove 1.4.56 Discharge Point TEDF Pump Station 2 (225E) from permit. Basis for change: Engine is no longer needed and has been removed from service.	20-NWP-004 inspection close-out describes damage to engine and isolation.	19-ECD-0057; 20-NWP-004
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.57	WTP MHF South-40 Laydown Entry Gate (Light Tower)	WTP MHF South-40 Laydown Entry Gate Light Tower CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.58	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.59	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.60	WTP MHF South-40 Laydown Yard East X-Ray Tent	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 54	1	Removal of DP 1.4.43	Removal confirmed through full compliance evaluation for 2020-2023 federal fiscal years.	22-ECD-000159
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.61	WTP Construction Site Pretreatment Tower Crane	WTP Construction Site Pretreatment Tower Crane Emergency Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.62	WTP Construction Site High-Level Waste Tower Crane	WTP Construction Site HLW Tower Crane Emergency Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 1	2	Addition of additional information for capacity for smaller existing emergency engines (up to 500 HP).	Update citation, when up to 500 hp Done for the following: 1.4.18, 1.4.49, 1.4.50, 1.4.51, 1.4.52, 1.4.53, 1.4.57, 1.4.61, 1.4.62 DP 1.4.63 is being removed through revision Item 62, so it does not need to be updated. MFW 3/8/2024: Added conditions requiring use of an hour meter and tracking emergency/non-emergency hours to maintain emergency status. DP 1.4.18 had this condition separately added as Item 1, Change 1.	02-RCA-051
Item 75	1	Integration of oil analysis program option into AOP conditions	40 CFR Part 63, Subpart ZZZZ, allows for oil analysis to extend time between oil and filter changes in many cases. This should be reviewed and potentially added to standard applicable requirements, where it is an option.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.63	WTP Construction Site Building T-14	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 62	1	Emergency engine for building T-14 no longer needed	Inspection on 2/23/2023 confirmed engine taken out of service with plan to physically remove. Engine was put into storage and then put into service with a new location/purpose at WTP. That installation will now be under DP 1.4.121 (See Item 81).	23-ECD-001970
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.64	Light Towers Waste Transfer Corridor East	Waste Transfer Corridor East Light Tower CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	9	Flex Engines - 1.4.64-68 and 1.4.70	Standardized conditions have been added for flexible groups of NSPS engines. DP 1.4.69 had already been removed from the AOP.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.65	Light Towers Waste Transfer Corridor West	Waste Transfer Corridor West Light Tower CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	9	Flex Engines - 1.4.64-68 and 1.4.70	Standardized conditions have been added for flexible groups of NSPS engines. DP 1.4.69 had already been removed from the AOP.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 7	1	Correcting DP 1.4.65 to indicate Waste Transfer Corridor West.	DP 1.4.65 was supposed to covers the the Waste Transfer Corridor West. Text indicating "east" appears to be a copy/paste error. 15-ECD-0010 shows east and west being separate groups.	17-ECD-0046 15-ECD-0010
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.66	Light Towers C Farm Trailer Area	C Farm Trailer Area Light Tower CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	9	Flex Engines - 1.4.64-68 and 1.4.70	Standardized conditions have been added for flexible groups of NSPS engines. DP 1.4.69 had already been removed from the AOP.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.67	Light Towers C Farm	C Farm Light Tower CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	9	Flex Engines - 1.4.64-68 and 1.4.70	Standardized conditions have been added for flexible groups of NSPS engines. DP 1.4.69 had already been removed from the AOP.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.68	AY/AZ Farm DMI-LT Light Tower	AY/AZ Farm DMI-LT Light Tower CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	9	Flex Engines - 1.4.64-68 and 1.4.70	Standardized conditions have been added for flexible groups of NSPS engines. DP 1.4.69 had already been removed from the AOP.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.69	Reserved	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.70	Light Towers AN Farm	AN Farm Light Tower CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	9	Flex Engines - 1.4.64-68 and 1.4.70	Standardized conditions have been added for flexible groups of NSPS engines. DP 1.4.69 had already been removed from the AOP.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.71	200E Effluent Treatment Facility Engine	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 23	1	Remove 1.4.47 Discharge Point 242-A Evaporator from permit. Basis for change: Engine is no longer needed and has been removed from service.	Physical inspection was planned for March 2020, converted to records-only inspection due to COVID. Permittee confirmed that the engine was permanently shut down in 2017, when it had been removed from the dangerous waste permit. Physical removal of engine and fuel tank was planned once site was returned to service. This documentation was found to be sufficient for DP removal, based upon EPA enforcement policy authorizing suspension of physical inspections during COVID health emergency and continued inspection of the facility for the dangerous waste permit.	19-ECD-0057; 20-NWP-004
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.72	251W Substation Emergency Backup Engine	251W Substation Emergency Backup Generator SI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	8	JJJJ Engines - 1.4.72 header update and standardized NSPS conditions	Conditions for NSPS Subpart JJJJ engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.73	WTP MHF South-40 Laydown Yard Laborers Tent	WTP MHF South-40 Laydown Yard Laborers Tent Light Tower/Generator CI Engine	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 83	1	Update of standard language	Renewal 3 conditions do not acknowledge oil analysis program or requirment to minimize idle and startup times.	N/A
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.74	WTP MHF South-40 Laydown Yard Warm-up/Cool-down Tent	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 54	3	Removal of DP 1.4.74	Removal confirmed through full compliance evaluation for 2020-2023 federal fiscal years.	22-ECD-000159
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.75	400 Area Water Treatment System Engines	400 Area Water System CI Engines	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	10	Flex Engines - 1.4.75	Standardized conditions have been added for flexible groups of NSPS engines.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.76	CWC Facility Existing Light Plant Engines	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 65	1	Removal of engines	DP 1.4.76 was scheduled to be inspected on 1/24/2023 (23.AQ01) but removal discussed with inspector. Should be sufficient to close out. DP 1.4.77 and 1.4.78 have been consistently reported as not being used in 2021 or 2022, inspection 22.AQ03 (9/29/2022) verified in storage with DP 1.4.76 light plants. Should be reasonably sufficient to close out during this inspection cycle.	23-ECD-0031
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.77	CWC Facility New Light Plant Engines	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 65	1	Removal of engines	DP 1.4.76 was scheduled to be inspected on 1/24/2023 (23.AQ01) but removal discussed with inspector. Should be sufficient to close out. DP 1.4.77 and 1.4.78 have been consistently reported as not being used in 2021 or 2022, inspection 22.AQ03 (9/29/2022) verified in storage with DP 1.4.76 light plants. Should be reasonably sufficient to close out during this inspection cycle.	23-ECD-0031
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.78	200 W SWOC Administrative Offices Engines	N/A - Removed	Retired

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 65	1	Removal of engines	DP 1.4.76 was scheduled to be inspected on 1/24/2023 (23.AQ01) but removal discussed with inspector. Should be sufficient to close out. DP 1.4.77 and 1.4.78 have been consistently reported as not being used in 2021 or 2022, inspection 22.AQ03 (9/29/2022) verified in storage with DP 1.4.76 light plants. Should be reasonably sufficient to close out during this inspection cycle.	23-ECD-0031
General Item 32	1	Addition of "Retired DP" table and deletion of Reserved pages	Renewal 3 has a significant number of essentially blank pages which will just increase with each issuance, as equipment is retired. This could be better handled with a single table showing the retired DP, former name, which AOP revision covered that removal, etc.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.79	222S Engine for Direct Drive Ventilation	222S CI Engine for Direct Drive Ventilation	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 4	5	IIII Engines - 1.4.79 header update and standardized NSPS Subpart IIII conditions	Conditions for NSPS Subpart IIII engines have been updated to a standardized format.	17-ECD-0046; 17-ECD-0049; 17-ESQ-0021; 18-ESQ-007
Item 76	1	Engines which demonstrate compliance with 40 CFR Part 63, Subpart ZZZZ, through compliance with 40 CFR Part 60, Subpart IIII or JJJJ, should have an acknowledgement of both in the AOP. Subpart ZZZZ is an applicable requirement, even if it is satisfied through compliance with another applicable requirement.	40 CFR 63.6590(c) defers the compliance demonstration to Part 60. An acknowledgement of Subpart ZZZZ and the exemption in the header would sufficiently identify the applicable requirement. The IIII/JJJJ conditions already in place would then be sufficient to ensure compliance with both Part 60 and Part 63.	
General Item 22	17	CFR citatation consistency update	Add appropriate 40 CFR 60/61/63 before NSPS/NESHAP references in DP headers. Use shorthand reference (ex: NESHAP Subpart ZZZZ) in DP conditions. Add appropriate 40 CFR 60/61/63 in non-DP text. Remove remaining "§" characters from CFR cites.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.80	Effluent Management Facility	WTP Effluent Management Facility	Active

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
General Item 3	1	Revision of discharge point names and descriptions to better describe emission units	In coordination with DOE and HMIS, all discharge point names and descriptions reviewed and updated as needed to ensure the type of equipment/facility and approximate location on site was reasonably identified	N/A
General Item 4	1	Numbering AOP conditions to allow for references.	Renewal 3 and previous versions did not number conditions, which makes it difficult to reference conditions in compliance certifications, inspection reports, communication, etc. Numbering added and lists within conditions updated do standard format.	N/A
General Item 29	1	Abbreviation list/table addition	Abbreviations were inconsistently identified within Attachment 1. This led to terms being defined multiple times, sometimes differently, or not being defined at all. A table of abbreviations has been added to Section 1.0. Text has been updated where these abbreviations were previously defined or used.	N/A
Item 25	1	Incorporation of DE16NWP-003, Revision 1	Updated approval order for the Effluent Management Facility associated with the Waste Treatment and Immobilization Plant is integrated into DP 1.4.80. This order updated general mercury sampling requirements into requirements for dimethyl mercury specifically. Additionally, condition numbering was updated to (1), (2), (3), etc. for consistency with the rest of the AOP.	DE16NWP-003, Revision 1
General Item 22	1	Updating the following non-standard number formats: DP 1.4.19 - parenthetical 5% DP 1.4.23 - parenthetical (6) months 1.4.24 - parenthetical/written twenty (20) percent DP 1.4.25 - parenthetical (5) percent, thirty (30) days, ninety (90) days DP 1.4.26 - ninety (90) days 1.4.28 - parenthetical/written twenty (20) percent DP 1.4.32 - parenthetical 5%, (5) working days, thirty (30) days, sixty (60) days, ninety (90) days DP 1.4.80 - parenthetical (5) %, thirty (30) days, ninety (90) days	Updating to match rest of AOP. For numbers 1-9, write out in text For numbers 10+, use numerals When related groups have both large and small numbers, go to numerals No use of parenthetical numbers [e.g., fifteen (15)]	N/A
General Item 26	20	1.4.80: Consideration of opacity limit	Opacity condition has been updated to be clearer that observing opacity triggers the requirement to do a single Method 9 test. The previous condition could be interpreted that there is a separate schedule/frequency of testing which applies when visible emissions are observed. DE16NWP-003, Approval Condition 1.1.1 has a 5% opacity limit and compliance is tied to EPA Method 9 in Approval Condition 1.3.1.1. The AOP condition inappropriately cited this to WAC 173-400-040(2), which is the 20% general standard verified by Ecology Method 9A.	N/A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.81	N/A - New in Renewal 4	High-Purge Operation of Rotary Core Tank Sampling System	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 24	1	Incorporation of DE14NWP-001 and Amendment A	Applicable requirements from the new approval order chain need to be incorporated into Renewal 4 of the AOP.	DE14NWP-001

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.82	N/A - New in Renewal 4	Ventilation Systems for 241-AW Tank Farm	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 26	1	Incorporation of DE18NWP-001 and Amendment A	Applicable requirements from the new approval order chain need to be incorporated into Renewal 4 of the AOP. Active ventilation in both the 241-AW and 241-AN Tank Farms was previously covered by approval order DE14NWP-001 and DP 1.4.25. The 241-AW Tank Farm was split to a new approval order chain, DE18NWP-001. The applicable requirements are now different enough to warrent a separate dischage point, DP 1.4.82.	DE18NWP-001; DE18NWP-001 TSD; DE18NWP-001, Amendment A

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.83	N/A - New in Renewal 4	241-AX Tank Farm Area Light Plant CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	1	Addition of flexible group of small engines at the AX Farm Area, 200 East	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.84	N/A - New in Renewal 4	AY-102 Control Trailer Area Light Plant & Generator CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	2	Addition of flexible group of small engines for the AY-102 Control Trailer Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.85	N/A - New in Renewal 4	Inter-Farm AX Access Area Light Plant & Generator CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	3	Addition of flexible group of small engines for the Inter-Farm AX Access Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.86	N/A - New in Renewal 4	Inter A-Farm Construction Area Light Plant & Generator CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	4	Addition of flexible group of small engines for the Inter A-Farm Construction Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.87	N/A - New in Renewal 4	Inter A-Farm Parking Area Light Plant CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	5	Addition of flexible group of small engines for the Inter A-Farm Parking Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.88	N/A - New in Renewal 4	Marshalling Yard Area Light Plant CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	6	Addition of flexible group of small engines for the Marshalling Yard Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.89	N/A - New in Renewal 4	MO098, MO164, MO173, and MO174 Trailer Area Light Plant CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 10	7	Addition of flexible group of small engines for the MO098, MO164, MO173, and MO174 Trailer Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology.	17-ECD-0049

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.90	N/A - New in Renewal 4	MO194 and MO195 Trailer Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 37	1	Addition of flexible group of small engines at the MO194 & MO195 Area	Nonroad engines which become stationary, due to use in the same location for more than 12 months or seasonally, trigger applicable requirements from federal engine regulations. These applicable requirements must be incorporated into the AOP. This discharge point covers a flexible group which collectively would not trigger New Source Review or require approval by Ecology. Addition of this group was initially requested in Letter 17-ECD-0049, but the most recent information is contained in Letter 20-ECD-0003.	17-ECD-0049; 20-ECD-0003

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.91	N/A - New in Renewal 4	Wye Barricade Emergency Generator SI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 56	3	Addition of new discharge point for Wye Barricade	New discharge point 1.4.91 added with standard NSPS JJJJ conditions. This engine did not trigger New Source Review.	20-ESQ-0035

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.92	N/A - New in Renewal 4	506BA Telecommunications Facility North Emergency Generator CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 30	2	Addition of discharge point for 506BA Telecommunications Facility North Emergency Generator Engine	Engine did not trigger New Source Review. Due to the model year, engine is not subject to NSPS Subpart IIII and therefore must meet applicable requirements from NESHAP Subpart ZZZZ.	17-ESQ-0096; 20-ESQ-0035

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.93	N/A - New in Renewal 4	182B Reservoir and Pump House Emergency Generator CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 30	3	Addition of discharge point for 182B Reservoir and Pump House Emergency Generator Engine	Engine did not trigger New Source Review. Due to the model year, engine is not subject to NSPS Subpart IIII and therefore must meet applicable requirements from NESHAP Subpart ZZZZ.	17-ESQ-0096; 20-ESQ-0035

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.94	N/A - New in Renewal 4	200E Sewage Transfer System Main Lift Emergency Generator CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 14	1	Addition of 200E Sewage Transfer System Main Lift Emergency Generator Engine	New discharge point 1.4.94 added with standard NSPS Subpart IIII conditions. This engine did not trigger New Source Review.	18-ESQ-0078

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.95	N/A - New in Renewal 4	273 Air Conditioning CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 35	1	Addition of 273 Building Air Conditioner Engine	New discharge point 1.4.95 added with standard NSPS Subpart IIII conditions. This engine did not trigger New Source Review.	20-ESQ-0028

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.96	N/A - New in Renewal 4	2711EA Air Conditioner CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 35	2	Addition of 2711EA Building Air Conditioner Engine	New discharge point 1.4.96 added with standard NSPS Subpart IIII conditions. This engine did not trigger New Source Review.	20-ESQ-0028

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.97	N/A - New in Renewal 4	2711EB Air Conditioner CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 35	3	Addition of 2711EB Building Air Conditioner Engine	New discharge point 1.4.97 added with standard NSPS Subpart IIII conditions. This engine did not trigger New Source Review.	20-ESQ-0028

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.98	N/A - New in Renewal 4	L-895 200W Emergency CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 43	1	Discharge point addition for the L-895 200W Emergency Engine	Discharge point has been added with both standard NSPS Subpart IIII conditions and applicable requirements from approval order DE19NWP-001, Revision 1	DE19NWP-001, Revision 1; DE19NWP-001, Revision 1 TSD

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.99	N/A - New in Renewal 4	CPWTF Discharge to TEDF Lagoons	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 43	3	Addition of a discharge point for the Central Plateau Water Treatment Facility discharge to TEDF lagoons and potable water tanks covered by DE19NWP-001, Revision 1	Applicable requirements from approval order DE19NWP-001, Revision 1 have been added to DPs 1.4.99-101.	DE19NWP-001, Revision 1; DE19NWP-001, Revision 1 TSD

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.100	N/A - New in Renewal 4	CPWTF L-849 Sanitary Water Storage in 200 East	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 43	3	Addition of a discharge point for the Central Plateau Water Treatment Facility discharge to TEDF lagoons and potable water tanks covered by DE19NWP-001, Revision 1	Applicable requirements from approval order DE19NWP-001, Revision 1 have been added to DPs 1.4.99-101.	DE19NWP-001, Revision 1; DE19NWP-001, Revision 1 TSD

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.101	N/A - New in Renewal 4	CPWTF L-850 Sanitary Water Storage in 200 West	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 43	3	Addition of a discharge point for the Central Plateau Water Treatment Facility discharge to TEDF lagoons and potable water tanks covered by DE19NWP-001, Revision 1	Applicable requirements from approval order DE19NWP-001, Revision 1 have been added to DPs 1.4.99-101.	DE19NWP-001, Revision 1; DE19NWP-001, Revision 1 TSD

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.102	N/A - New in Renewal 4	Gable Mountain SI Engines – 6220 Building Backup	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 52	1	Addition of 622 Meteorological Tower emergency engine	New discharge point 1.4.102 added with standard NSPS Subpart JJJJ conditions. This engine did not trigger New Source Review.	21-ESQ-0005

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.103	N/A - New in Renewal 4	Gable Mountain SI Engines - Solar Array	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 53	1	Addition of discharge point for engine at Gable Mountain East Meteorological Tower	New discharge point 1.4.103 added with standard NSPS Subpart JJJJ conditions. This engine did not trigger New Source Review.	22-ECD-000046

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.104	N/A - New in Renewal 4	2506E4 Telecommunications Building Emergency SI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 29	1	Addition of discharge point for emergency engine at the 2506E4 Telecommunications Building	New disharge point 1.4.104 added with standard NSPS Subpart JJJJ conditions. This engine did not trigger New Source Review.	20-ESQ-0016

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.105	N/A - New in Renewal 4	ETF Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	1	Addition of new discharge point for ETF Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.106	N/A - New in Renewal 4	LERF Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	2	Addition of new discharge point for LERF Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.107	N/A - New in Renewal 4	MO493 Trailer Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	3	Addition of new discharge point for MO493 Trailer Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.108	N/A - New in Renewal 4	241-AY Farm Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	4	Addition of new discharge point for AY Farm Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.109	N/A - New in Renewal 4	241-AY Tank Farm Power Supply Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	5	Addition of new discharge point for AY Farm Power Supply Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.110	N/A - New in Renewal 4	241-A Tank Farm Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	6	Addition of new discharge point for A Farm Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.111	N/A - New in Renewal 4	241-AW Tank Farm Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	7	Addition of new discharge point for AW Farm Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.112	N/A - New in Renewal 4	241-AP Tank Farm North Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	8	Addition of new discharge point for AP Farm North Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.113	N/A - New in Renewal 4	241-AP Tank Farm East Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	9	Addition of new discharge point for AP Farm East Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.114	N/A - New in Renewal 4	241-SY Tank Farm Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	10	Addition of new discharge point for SY Farm Area Engines	Standardized conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.115	N/A - New in Renewal 4	222-S Laboratory Area CI Engines	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 36	12	Addition of new discharge point for 222-S-Laboratory Area Engines	Standardized flex conditions to be added.	20-ECD-0003; 24-ECD-0111

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.116	N/A - New in Renewal 4	Ventilation Systems for 241-AP Tank Farm	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 66	1	Incorporation of DE19NWP-001 for the 241-AP Tank Farm	Applicable requirements from the new approval order chain need to be incorporated into Renewal 4 of the AOP. Active ventilation in the 241-AP, 241-SY, and 241-AY/AZ Tank Farms was previously covered by approval order DE11NWP-001, Revision 4, and DP 1.4.32. The 241-AP Tank Farm was split to a new approval order chain, DE19NWP-003. The applicable requirements are now different enough to warrent a separate dischage point, DP 1.4.116.	DE19NWP-003; DE19NWP-003 TSD

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.117	N/A - New in Renewal 4	Ventilation Systems for 241-A Tank Farm	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 74	2	Incorporation of DE23NWP-001, Revision 1, for the 241-A Tank Farm into new DP 1.4.117	Applicable requirements from the new approval order chain need to be incorporated into Renewal 4 of the AOP. Active ventilation in the 241-A, 241-AX, 241-B, 241-BX, 241-BY, 241-C, 241-S, 241-SX, 241-T, 241-TX, 241-TY, and 241-U Tank Farms was previously covered by approval order DE05NWP-001, Revision 2, and DP 1.4.26. The 241-A Tank Farm was split to a new approval order chain, DE23NWP-001. The applicable requirements are now different enough to warrent a separate dischage point, DP 1.4.117.	DE05NWP-002, Revision 3; DE05NWP-002, Revision 3 TSD; DE23NWP-001, Revision 1; DE23NWP-001 TSD

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.118	N/A - New in Renewal 4	225BC-PTS800 Air Compressor CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 16	1	Addition of 225BC Air Compressor Engine	Notification requests addition of an engine powering an air compresser for the Waste Encapsulation and Storage Facility. DP 1.4.55 previously covered an engine serving the same function at the same location. When the original engine was damaged beyond repair, the permittee did not anticipate that these services would be needed and requested removal in 2016. This was incorporated into Renewal 3. Due to the gap between installations, new DP 1.4.120 is being added instead of bringing back historical DP.	18-ESQ-0017

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.119	N/A - New in Renewal 4	WTP Construction Site T-52 Building Emergency SI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 81	1	Requested DP addition.	Engine was previously used as emergency engine for WTP concrete batch plant (DP 1.4.63), but was no longer needed for that purpose. New discharge point created due to different location/purpose.	23-ECD-0095

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.120	N/A - New in Renewal 4	TSCR HVAC Generator CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 87	1	Letter requests new engine DP	Engine shouldn't need flex conditions, more dedicated-purpose. Diesel/Subpart IIII engine, 40.2 bhp non-emergency. Purpose is distinct from the other light plant engines in the area.	24-ECD-0192

Point	Renewal 3 Name	Renewal 4 Name	DP Status
1.4.121	N/A - New in Renewal 4	WTP MHF South-40 OE Tent Generator CI Engine	New

Review Item	Potential Change #	Change Description	Notes	Supporting Document(s)
Item 60	3	Addition of new MHF engine via OPC as DP 1.4.121	Standard non-emergency CI engine conditions added from 2/24/2025 email "RE: BNI OPC for Material Handling Facility Engines."	22-ECD-002014; email "RE: BNI OPC for Material Handling Facility Engines"; Letter 25-ECD-0048