Potential revisions reviewed by tracking Item

Item #	Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Document(s)
1	Complete	241-AP arsenic detection limit update	Att. 1	116	25-ECD-0052; 25-NWP-063
2	Complete	CFR citation fix for NESHAP ZZZZ exemption	Att. 1	10, 11, 16, 17, 18, 23	
3	Complete	DE25NWP-001 - WESF air compressor integration	Att. 1	118	DE25NWP-001; DE25NWP-001 Technical Support Document; Response to Comments for AOP.2025.1D Draft
4	Hold/Delay Review	Integration of Eastern Plateau Fire Station (DE21NWP-001, Rev. 1)	Att. 1	New (TBD)	25-NWP-066; DE21NWP-001, Rev. 1
5	No Revisions	Duplicated w/Item 28 - Updates to title/cover pages for document consistency	All	N/A	N/A
6	Hold/Delay Review	NUCON/BY-108 Thermal Oxidizer Integration (DE23NWP-002)	Att. 1	New (TBD, may never be set)	23-NWP-108; DE23NWP-002
7	Complete	Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07	Att. 1	10, 11, 35, 36,	Original AOP Statement of Basis.pdf
8	Complete	FF-01 updates, including OPC	Att. 2; Att. 2 SoB;	N/A	25-ECD-0167; 25-ECD-0169; 25-ECD-0177; 26-ECD-0036; 26-ECD-0063; 26-ECD-070: 26-ECD-0083; 26-ECD-0084; Response to Comments for AOP.2025.1D Draft
9	Complete	Configuration Control Update	STGC, STGC SoB	N/A	
10	Hold/Delay Review	TGC 5.6.2.c reference to Attachment 1, Table 1.1, may be outdated - hold for semiannual report content review	STGC	N/A	
11	Complete	WAC 173-400-050 addition to Table 1.1, Section 2.4, and SoB.	Att. 1; Att. 1 SoB	N/A	N/A
12	Complete	Tech editing/formatting/misc. fixes (Review left open until after tech editing and file QA/QC)	All	N/A	
13	Complete	Updating historical boiler source testing, NESHAP DDDDD testing	Att. 1	2, 3, 7, 8	26-NWP-070; Hanford AR Accession DA263055; 05-AMRC-0291; Approval Order 97NM-138; Response to Comments for AOP.2025.1D
14	Hold/Delay Review	Adding Att. 1, Appendix A, with approval orders, NSPS, and NESHAPs that apply to Hanford to cover complete applicable requirements.	TBD	N/A	
15	Complete	Source determination language update (STGC SoB 2.0)	STGC SoB	N/A	Response to Comments for AOP.2025.1D draft
16	Complete	RCW 70.92 citation update for public comment.	STGC SoB	N/A	Response to Comments for AOP.2025.1D draft
17	Complete	Straightforward DOE Comment Fixes	STGC, Att. 1	19, 23 25, 26, 32, 35, 82, 105, 116, 120	Response to Comments for AOP.2025.1D draft
18	Complete	Consideration of DOE comments on Method 9 "Quantification" and 18-minute observation language	Att. 1	14, 16, 17, 20, 23, 24,26, 28, 29 81, 82, 117, 118	Response to Comments for AOP.2025.1D draft
19	Complete	DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.10-2.12	Att. 1	ZZZZ: 10, 11, 16, 17, 18, 23, 49, 50, 51, 52, 53, 57, 61, 62, 73, 92, 93, 119 IIII: 24, 29, 39, 64, 65, 66, 67, 68, 70, 72, 75, 79 (Noted no DPF in header), 83, 84, 85, 86, 87, 88, 89, 90, 94, 95, 96, 97, 98, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 118, 120, 121	Response to Comments for AOP.2025.1D draft
20	Hold/Delay Review	Shifting boiler and turbine NSPS/NESHAP to new subsection in Section 2.	Att. 1	TBD	
21	Complete	Correction of "NSR exempt (historical)" language	Att. 1	10, 11, 35, 36, 49, 50, 51, 53	
22	Complete	Updating discussion of Att. 1 SoB models & historical boiler source testing.	Att. 1, Att. 1 SoB	All	Response to Comments for AOP.2025.1D draft
23	Complete	Removing "Test Method/Frequency" lines when they aren't related to condition content, consistently citing EPA methods, cleaning up WTP limits	Att. 1	Nearly All (Except 33, 57, 61, 62, 73, 80, 95, 96, 97, 99, 100, 101, 118, 120, 121)	Response to Comments for AOP.2025.1D draft
24	Complete	Removal of DP 1.4.38, 100K Water Treatment Plant engine, and DP 1.3.73, WTP South-40 Laydown Yard Laborer's Tent	Att. 1	38, 73	25-ECD-0135; 26-ECD-0032
25	Complete	OPC engines w/o approval order updates	Att. 1	57; New (103, 122, 123, 124))	25-ECD-0144, 25-ECD-0145; 26-ECD-0016; 26-ECD-0018; 26-ECD-0061
26	No Revisions Proposed	Combined w/Item 23 - Filterable PM test method language inconsistent, potentially needs another update	Att. 1	23	
27	No Revisions Proposed	Consider whether we need some sort of supersedence language for Renewal 3 (or if that language exists and needs to be updated)		0	
28	Complete	Cover/intro pages are very inconsistent, especially SoBs	All	N/A	
29	Complete	Addition of NSPS KKKKa for turbines	Att. 1	23	
30	Hold/Delay Review	Consider changing text at end of Att. 1 SoB, Section 1.4, regarding discontinuing requirements for "obsolete" approval orders		0	
31	Complete	Removal/modification of AOP conditions listing specific test methods, with no testing frequency, for historical boilers and engines	Att. 1	2, 3, 7, 8	Response to Comments for AOP.2025.1D draft
32	Complete	Condition updates for for WTP: DE02NWP-002, Rev 4.	Att. 1	23	DE02NWP-002, Rev. 4; DE02NWP-002, Rev. 4, Technical Support Document
33	Complete	New conditions for LERF/ETF: Approval Order DE07NWP-003, Rev. 3	Att. 1	19	DE07NWP-003, Rev. 3; DE07NWP-003, Rev. 3, Technical Support Document
34	Complete	Making current "Condition Approval" lines more understandable	Att. 1	All	
35	Complete	Updating Periodic Monitoring lines with "Not applicable" when maintenance checks or source testing are specified in the condition	Att. 1	2, 3, 7, 8, 117	
36	Complete	Updating STGC 5.16.3 regarding WAC 173-401-645 and affirmative defense	STGC	N/A	
37	Complete	Conversion of "shall" to "must" or "will"	STGC, STGC SoB, Att. 1,	All	Response to Comments for
38	Hold/Delay Review	STGC 5.2.c states we will provide a "reasonable advance notice" where controlled access areas will be entered. Consider setting a specific minimimum (e.g., 1 business day) instead.		0	

39	Complete	DE07NWP-004 has two clear limits/conditions that don't seem to be addressed in DP 1.4.30.	Att. 1	30	DE07NWP-004
40	Complete	Updating confusing references to additional approval orders in DP 1.4.81.	Att. 1	81	DE14NWP-001

Revisions made by discharge point

Discharge Point	Title	AOP.2026.1D Revisions
1.4.1	234-5Z, Boiler 1, 2, and 3 (>5 mmBTU/hr – Fuel Oil)	
1.4.2	242-A, Boiler 1, 2, and 3 (>5 mmBTU/hr – Fuel Oil)	Item 12, Change 8: Spelling of breeching (boiler term) Item 13: Updating historical boiler source testing, NESHAP DDDDD testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 31: Potential edits to 90s boiler and engine testing conditions for Hanford Challenge comment O-1-4 Item 35: Fixing "not applicable" periodic monitoring lines. Item 37: Switching shall for must.
1.4.3	318 Boiler (<5 mmBTU/hr – Natural Gas)	Item 12, Change 8: Spelling of breeching (boiler term) Item 13: Updating historical boiler source testing, NESHAP DDDDD testing Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 35: Fixing "not applicable" periodic monitoring lines. Item 37: Switching shall for must.
1.4.4	Reserved	
1.4.5	3709A Boiler (<5 mmBTU/hr – Natural Gas)	
1.4.6	324 Boiler 1 and Boiler 2(>5 mmBTU/hr – Natural Gas)	
1.4.7	325 Boiler 1 and Boiler 2(>5 mmBTU/hr – Natural Gas)	Item 12, Change 8: Spelling of breeching (boiler term) Item 13: Updating historical boiler source testing, NESHAP DDDDD testing Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 31: Potential edits to 90s boiler and engine testing conditions for Hanford Challenge comment O-1-4 Item 35: Fixing "not applicable" periodic monitoring lines. Item 37: Switching shall for must.
1.4.8	331 Boiler 1 and Boiler 2 (<5 mmBTU/hr – Natural Gas)	Item 12, Change 8: Spelling of breeching (boiler term) Item 13: Updating historical boiler source testing, NESHAP DDDDD testing Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 31: Potential edits to 90s boiler and engine testing conditions for Hanford Challenge comment O-1-4 Item 35: Fixing "not applicable" periodic monitoring lines Item 37: Switching shall for must.
1.4.9	Portable Boiler (<5 mmBTU/hr – Dual Fuel)	
1.4.10	E-225BC 001	Item 2: CFR citation fix for NESHAP exemption Item 7: Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07 Item 12, Change 6: AEI underline fix Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.11	E-225BG 001	Item 2: CFR citation fix for NESHAP exemption Item 7: Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07 Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.12	Reserved	
1.4.13	Reserved	
1.4.14	CWC	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.15	Concrete Batch Plant	
1.4.16	E-282ED 001	Item 2: CFR citation fix for NESHAP exemption Item 13: Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07 Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 31: Potential edits to 90s boiler and engine testing conditions for Hanford Challenge comment O-1-4 Item 37: Switching shall for must.
1.4.17	E-282WD 001	Item 2: CFR citation fix for NESHAP exemption Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 31: Potential edits to 90s boiler and engine testing conditions for Hanford Challenge comment O-1-4 Item 37: Switching shall for must.
1.4.18	Emergency Diesel Generators	Item 2: CFR citation fix for NESHAP exemption Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.19	P-2025E ETF	Item 17: Straightforward DOE Comment Fixes Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 33: Integrating DE07NWP-003, Revision 3 Item 37: Switching shall for must.
1.4.20	P-2706T 001	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.21	Reserved	
1.4.22	P-296W004 001	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.23	P-WTP-001	Item 2: CFR citation fix for NESHAP exemption Item 12, Change 3: Indentation Issue Item 17: DOE comments, dangerous waste condition reference fix Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 32: Integrating DE02NWP-002, Revision 4 Item 37: Switching shall for must.
1.4.24	Integrated Disposal Facility (IDF)	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines, JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.25	Ventilation Systems for 241-AN and 241AW-Tank Farms	Item 17: Straightforward DOE Comment Fixes Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.26	200 Area SST Categorical Waste Retrieval	Item 17: Straightforward DOE Comment Fixes Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.27	E-85 Fuel Station	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.28	HAMMER Training and Education Facility	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing. Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.29	100B-181B/182B	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.

1.4.30	WTP Heaters and Dehumidifiers	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must. Item 39: DE07NWP-004 limits not addressed in DP 1.4.30.
1.4.31	300 Area/339A	
1.4.32	241-AP, 241-SY, and 241-AY/AZ Ventilation	Item 17: Straightforward DOE Comment Fixes Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.33	Lagoon Treatment System	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.34	SST Retrieval Direct Fired Water Heaters	
1.4.35	Hanford Site Asbestos Landfill	Item 7: Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07 Item 17: Straightforward DOE Comment Fixes Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.36	600 Area Gas Distribution	Item 7: Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07 Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.37	Reserved	
1.4.38	100K Water Treatment Plant	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 24: Removal of DP 1.4.38 and 1.4.73 Item 37: Switching shall for must.
1.4.39	385 Building	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.40	Reserved	
1.4.41	Reserved	
1.4.42	Reserved	
1.4.43	WTP MHF South-40 Laydown Critical Equipment Storage	
1.4.44	2720EA	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.45	Rattle Snake Barricade	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.46	Reserved	
1.4.47	242-A	
1.4.48	234-5Z	
1.4.49	400 Area	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.50	600 Area Fire Station (Building 609A)	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.51	2721E	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.52	Yakima Barricade	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.53	282-B	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 21: Correction of "NSR exempt (historical)" language Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.54	Reserved	
1.4.55	Reserved	
1.4.56	TEDF Pump Station 2 (225E)	
1.4.57	WTP MHF South-40 Laydown Entry Gate (Light Tower)	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 25: OPC engines w/o approval order updates (engine removal) Item 37: Switching shall for must.
1.4.58	Reserved	
1.4.59	Reserved	
1.4.60	WTP MHF South-40 Laydown Yard East X-Ray Tent	
1.4.61	WTP Construction Site Pretreatment Tower Crane	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.62	WTP Construction Site High-Level Waste Tower Crane	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.63	WTP Construction Site Building T-14	
1.4.64	Light Towers Waste Transfer Corridor East	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.65	Light Towers Waste Transfer Corridor West	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.66	Light Towers C Farm Trailer Area	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.67	Light Towers C Farm	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.68	AY/AZ Farm DMI-LT Light Tower	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.69	Reserved	
1.4.70	Light Towers AN Farm	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.71	200E Effluent Treatment Facility Engine	

1.4.72	251W Substation Emergency Backup Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.73	WTP MHF South-40 Laydown Yard Laborers Tent	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 24: Removal of DP 1.4.38 and 1.4.73 Item 37: Switching shall for must.
1.4.74	WTP MHF South-40 Laydown Yard Warm-up/Cool-down Tent	
1.4.75	400 Area Water Treatment System Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.76	CWC Facility Existing Light Plant Engines	
1.4.77	CWC Facility New Light Plant Engines	
1.4.78	200 W SWOC Administrative Offices Engines	
1.4.79	222S Engine for Direct Drive Ventilation	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.80	Effluent Management Facility	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.81	High-Purge Operation of Rotary Core Tank Sampling System	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must. Item 40: References to additional approval order which might set alternative limits for ammonia and opacity
1.4.82	Ventilation Systems for 241-AW Tank Farm	Item 17: Straightforward DOE Comment Fixes Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.83	241-AX Tank Farm Area Light Plant CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.84	AY-102 Control Trailer Area Light Plant & Generator CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.85	Inter-Farm AX Access Area Light Plant & Generator CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.86	Inter A-Farm Construction Area Light Plant & Generator CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.87	Inter A-Farm Parking Area Light Plant CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.88	Marshalling Yard Area Light Plant CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.89	MO098, MO164, MO173, and MO174 Trailer Area Light Plant CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.90	MO194 and MO195 Trailer Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.91	Wye Barricade Emergency Generator SI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.92	506BA Telecommunications Facility North Emergency Generator CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.93	182B Reservoir and Pump House Emergency Generator CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.94	200E Sewage Transfer System Main Lift Emergency Generator CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.95	273 Air Conditioning CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.96	2711EA Air Conditioner CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.97	2711EB Air Conditioner CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.98	L-895 200W Emergency CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.99	CPWTF Discharge to TEDF Lagoons	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.100	CPWTF L-849 Sanitary Water Storage in 200 East	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.101	CPWTF L-850 Sanitary Water Storage in 200 West	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.102	Gable Mountain SI Engines – 6220 Building Backup	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 25: OPC engines w/o approval order updates (engine removal) Item 37: Switching shall for must.
~~1.4.103~~ Reserved	Gable Mountain SI Engines - Solar Array	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 25: DP Removal
1.4.104	2506E4 Telecommunications Building Emergency SI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (JJJJ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.105	ETF Area CI Engines	Item 17: Straightforward DOE Comment Fixes Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.

1.4.106	LERF Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.107	MO493 Trailer Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.108	241-AY Farm Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.109	241-AY Tank Farm Power Supply Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.110	241-A Tank Farm Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.111	241-AW Tank Farm Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.112	241-AP Tank Farm North Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.113	241-AP Tank Farm East Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.114	241-SY Tank Farm Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.115	222-S Laboratory Area CI Engines	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.116	Ventilation Systems for 241-AP Tank Farm	Item 1: 241-AP arsenic detection limit update Item 17: Straightforward DOE Comment Fixes Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.117	Ventilation Systems for 241-A Tank Farm	Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 35: Fixing "not applicable" periodic monitoring lines. Item 37: Switching shall for must.
1.4.118	225BC-PTS800 Air Compressor CI Engine	Item 3: DE25NWP-001 - WESF air compressor integration Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 37: Switching shall for must.
1.4.119	WTP Construction Site T-52 Building Emergency SI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (ZZZZ Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.120	TSCR HVAC Generator CI Engine	Item 17: Straightforward DOE Comment Fixes Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 37: Switching shall for must.
1.4.121	WTP MHF South-40 OE Tent Generator CI Engine	Item 19: DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.9-2.11 (IIII Engines) Item 22: Updating discussion of Att. 1 SoB models & historical boiler source testing Item 23: Removing "Test Method/Frequency" lines when they aren't related to condition content & consistently citing EPA methods Item 37: Switching shall for must.
1.4.122	MO-153 Restroom Trailer Generator CI Engine	Item 25: OPC engines w/o approval order updates (engine addition) Item 37: Switching shall for must.
1.4.123	Direct Push CI Generator Engine at 200W S/SX Farm Complex	Item 25: OPC engines w/o approval order updates (engine addition) Item 37: Switching shall for must.
1.4.124	11A and Canton Avenue Light Plant Engines	Item 25: OPC engines w/o approval order updates (engine addition) Item 37: Switching shall for must.

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 1	Complete	241-AP arsenic detection limit update	Att. 1	116	25-ECD-0052; 25-NWP-063

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Adding language for relaxed arsenic detection threshold for 241-AP Tank Farm Method 29 testing.	Testing alternative clearly approved in letter 25-NWP-063 Best to identify approved testing alternatives, including very specific language on reviewing it upon the next AOP renewal.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 2	Complete	CFR citation fix for NESHAP ZZZZ exemption	Att. 1	10, 11, 16, 17, 18, 23	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Grammatically, text such as "40 CFR 63.6590(b)(3)(iii) and CFR 63.6640(f)" should either say the full "40 CFR" twice to be full citations or drop the second CFR in red.	In context, removing the second CFR seems to make the most sense logically and grammatically. Plus it's more succinct.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 3	Complete	DE25NWP-001 - WESF air compressor integration	Att. 1	118	DE25NWP-001; DE25NWP-001 Technical Support Document; Response to Comments for AOP.2025.1D Draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Addition of WESF air compressor	Approval order (DE25NWP-001) was issued during AOP.2025.1D public comment period. Engine is already on site and operating, hit one-year mark in August of 2025. Had notification for AOP and assignment of DP 1.4.118 to address federal engine regulations. See Response to Comments for AOP.2025.1D draft, DOE Comment #5 for request to add approval order conditions.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 5	No Revisions Proposed	Duplicated w/Item 28 - Updates to title/cover pages for document consistency	All	N/A	N/A

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 4	Hold/Delay Review	Integration of Eastern Plateau Fire Station (DE21NWP-001, Rev. 1)	Att. 1	New (TBD)	25-NWP-066; DE21NWP-001, Rev. 1

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Addition of DE21NWP-001, Rev. 1	Did not have timeline for construction/operation prior to lockdown of AOP.2026.1D draft. Add to the next significant mod package.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 6	Hold/Delay Review	NUCON/BY-108 Thermal Oxidizer Integration (DE23NWP-002)	Att. 1	New (TBD, may never be set)	23-NWP-108; DE23NWP-002

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Addition of conditions for approval order DE23NWP-002	Equipment is authorized to operate for less than a year (364 days) and conditions make it clear that an updated NOC application would be needed for longer. This keeps it from requiring an application to be in the AOP. Hold for future review in case the approval order is revised.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 7	Complete	Initial AOP application numbering appears to be incorrect DOE/RL-97-07 vs. DOE/RL-95-07	Att. 1	10, 11, 35, 36,	Original AOP Statement of Basis.pdf

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Historical engines identified in the first AOP application has an incorrect reference.	The original Statement of Basis used both DOE/RL-97-07 and DOE/RL-95-07. When drafting revisions for AOP.2025.1D draft, it looks like we copied the wrong document number when identifying the historical engines addressed in that document. 95-07 is available in the Hanford AR and applicable, 97-07 is not. This could potentially be considered a typographical error and processed as an administrative amendment if needed.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 8	Complete	FF-01 updates, including OPC	Att. 2; Att. 2 SoB;	N/A	25-ECD-0167; 25-ECD-0169; 25-ECD-0177; 26-ECD-0036; 26-ECD-0063; 26-ECD-070: 26 ECD-0083; 26-ECD-0084; Response to Comments for AOP.2025.1D Draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	FF-01 update for DOE comments.	DOE comments 2, 6, 7, and 9 on AOP.2025.1D draft address specific content in Attachment 2 and licensing by Department of Health. Health did not indicate that these were changes that had occurred/would be occuring for RAEL FF-01 after we locked down a version as Attachment 2 of AOP.2025.1D draft. They also don't look like anything where Ecology needs to use Title V authority and Attachment 2, Addendum A, to modify the incorporated version of FF-01. These comments seem to be outside the reasonable scope of Title V authority for Hanford. If DOE would like these changes, they should address them through the WAC 246-247 licensing process and we will incorporate the update into a future AOP version.	No
2	Addition of Health change tables to AOP.	With the amount of space these change tables would take up in the Statement of Basis for Attachment 2, it was decided that change tables would be provided as part of administrative records and we would potentially find a good place on our website to make them always accessible with the AOP instead.	Yes
3	OPC for 25-ECD-0167	Update for EU 193 ALARACT addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2
4	OPC for 25-ECD-0169	Update for EU 340 ALARACT addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2
5	OPC for 25-ECD-0177	241-S Tank Farm rad NOC application addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2
6	OPC for 26-ECD-0036	WTP EMF truck loading, EU 4689, addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2
7	OPC for 26-ECD-0063	Incorporation of FF-01 update for EU 2560 ALARACT. Applicable requirements, if established in FF-01, will be incorporated in Attachment 2 with updated FF-01.	N/A - in Att. 2
8	OPC for 26-ECD-0070	New EU 4689 for WTP EMF addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2
9	OPC for 26-ECD-0083	Closure of EU 885 and 886 addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2
10	OPC for 26-ECD-0084	Closure of EU 57 and 58 addressed by 7/9/2026 update of RAEL FF-01, incorporated in AOP.2026.1D draft.	N/A - in Att. 2

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 9	Complete	Configuration Control Update	STGC, STGC SoB	N/A	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Fixing or removing STGC SoB Appendix B.	With change to configuration control, process is changing. Forms and descriptions are confusing and, in some cases, not in accordance with regulations (e.g., thresholds for group processing of minor mods do not match WAC). Notification forms are likely still OK to send to EPA/affected states. Significantly updated discussion to address planned application/configuration control process.	Yes
2	Updating addresses in STGC 5.18-5.20	Significantly updated discussion to address planned application/configuration control process.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 10	Hold/Delay Review	TGC 5.6.2.c reference to Attachment 1, Table 1.1, may be outdated - hold for semiannual report content review	STGC	N/A	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Update of STGC 5.6.2.c	STGC 5.6.2.c requires semiannual report include "complaint investigation(s) required in Table 1.1 of Attachment 1 and issued during the reporting period." Table 1.1 used to contain significantly more of the site requirements, now it only has general standards. We should confirm whether this needs to be broader to include requirements which may have moved into Section 1.4 (discharge points) or elsewhere. MFW 8/19/2025: After review, content of Table 1.1 (Table 1.2 in the original Rev. 0) has not changed that significantly regarding complaint investigations and STGC 5.6.2.c still meets original intent. However, a holistic review of monitoring has been started and may lead to completely reworking these requirements. Hold item to integrate that review in the future.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 11	Complete	WAC 173-400-050 addition to Table 1.1, Section 2.4, and SoB.	Att. 1; Att. 1 SoB	N/A	N/A

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	WAC 173-400-050 needs to be addressed and the Attachment 1 SoB still describes Section 2.4 as being reserved.	Table 1.1 needs to address WAC 173-400-050. It would make a lot of sense to expand the new language in Attachment 1, Section 2.4, to cover monitoring for both -050(1) and -060. The SoB also needs new language addressing Section 2.4.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 12	Complete	Tech editing/formatting/misc. fixes (Review left open until after tech editing and file QA/QC)	All	N/A	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	STGC Section 5.9 has text that was inappropriately redlined and a missing space	MFW 5/11/26: Appears to be caught in tech editing of AOP.2025.1D already. No need to change in AOP.2026.1D files. Red and strikethrough text "for criteria pollutants" needs to be deleted and "mustcontain" needs a space.	No
2	STGC Section 5.18.1 has an extra space in "five years"	MFW 5/11/26: Appears to be caught in tech editing of AOP.2025.1D already. No need to change in AOP.2026.1D files. Delete extra space	No
3	DP 1.4.23 indentation issues	MFW 5/11/26: Appears to be caught in tech editing of AOP.2025.1D already. No need to change in AOP.2026.1D files. Starting at Condition 9, "Condition Approval" lines may have incorrect indentation.	No
4	Missing space in DP 1.4.23 Condition 1	MFW 5/11/26: Appears to be caught in tech editing of AOP.2025.1D already. No need to change in AOP.2026.1D files. "FUGITIVE DUST CONTROLThe Construction Phase" likely needs a space, if it wasn't already caught in tech editing.	No
5	Formatting issues on really deep list levels (or elsewhere)	MFW 5/11/26: Too nebulous to track here, beyond the fact that 5.27.3.1 looks to have been fixed in the AOP.2025.1D tech editing round. Affects at least the STGC in the version before tech editing, Section 5.27.3.1 spacing looking a little weird compared to 5.27.3. But these issues may have been fixed already. Need to do a scan of files from PDS for anything like this that might pop out.	No
6	DP 10 likley needs format fix for AEI line (underlining)	MFW 5/11/26: Item was already fixed.	No
7	Consider updating Att. 1 SoB, Section 3.1, emisson calculation formulas, assumptions, and variables.	MFW 5/11/26: A lot of this was removed. Can leave this for tech editors to decide if we tackle.	No
8	Breeching for boilers spelled incorrectly as "breaching" for DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8.	This does not appear to be a terribly common term, but industry standard spelling is breeching for the ductwork between boiler and stack/chimney. This language is not in the underlying approval order (97NM-138). It appears to have been introduced with AOP Renewal 0, Revision C, and Ecology used the same spelling as the DOE application. It would likely be best to change the spelling and give a little more indication of what is meant by changing this to "breeching (exhaust ductwork)" instead.	Yes
9	Inconsistency in abbreviation capitalization	Att. 1 seems to capitalize certain things the SoB doesn't (nitrogen dioxide and nitrogen oxides, for instance). Need to Figure out the best standard and apply it uniformly across documents.	Yes
10	STGC SoB has a lot of "Section X of the AOP"	This language should either be removed or be specific to state STGC. Each attachment has section numbers that repeat.	Yes
11	Formatting/style issue in transition between DP 1.4.22 and 1.4.23	Heading style links the last line of DP 1.4.22 to the main text of DP 1.4.23, seeming to skip over the actual heading for 1.4.23. Can't fix without creating a lot of extra redline.	Yes
12	Att. 3 and others: page numbers can't be set up to continue from the previous section without accepting tracked changes. They keep showing up as 0 and 1.	Can't fix directly, they revert when documents are closed. Tech editors are familiar with the issue.	Yes
13	Formatting/style issue in transition between DP	Heading style links the last line of DP 1.4.86 to the main text of DP 1.4.87, seeming to skip over the actual heading for 1.4.87. Can't fix without creating a	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 13	Complete	Updating historical boiler source testing, NESHAP DDDDD testing	Att. 1	2, 3, 7, 8	26-NWP-070; Hanford AR Accession DA263055; 05-AMRC-0291; Approval Order 97NM-138; Response to Comments for AOP.2025.1D

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Language in Section 2.6 is vague about history of source testing and there are issues with historical source testing addressed by DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8	Updating Section 2.6 to better address history and current issues with testing. See Change 2 below for schedule of compliance incorporation into a new Section 2.13 which is being referenced for DP 1.4.2, 1.4.3, 1.4.7, and 1.4.8 testing. Comment O-1-4 (Hanford Challenge) for AOP.2025.1D draft references thes testing requirements in Section 1.4, requesting an increase in sampling frequency when not specified. Going back to testing every 5 years under compliance schedule. Approval Order 97NM-138 established requirements to test every five years, which was later dropped from the AOP but not the approval order itself. That makes the testing an applicable requirement we need to get back into the AOP. Ecology approval letter for removing testing requirement is not numbered. Dated June 15, 2005, and stamped 0065604. Can be found in the Hanford AR with accession number DA263055. The DOE letter, 05-AMRC-0291, did mention the approval order and AOP in the body but only the AOP in the subject. We didn't mention the approval order in our response, just made the change for the AOP, and apparently never revised the approval order itself.	Yes
2	Schedule of complianc for WAC 173-401-630(3) and (4) which is consistent with WAC 173-401-510(2)(h)(iii)(C)	Need to add schedule of of compliance into new Attachment 1, Section 2.13, to address inspection report transmitted with Letter 26-NWP-070. WAC 173-401-510(2)(h)(iii)(C) notes that the compliance schedule "shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject." We don't have a decree or order, but that potentially indicates that it makes sense to match the inspection report that sets this compliance schedule. We also need to have reports at least semiannually for -630(4), so it makes sense to just reference the semiannual reports under STGC 5.6.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 14	Hold/Delay Review	Adding Att. 1, Appendix A, with approval orders, NSPS, and NESHAPs that apply to Hanford to cover complete applicable requirements.	TBD	N/A	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Addition of active NSR authorizations and other sources of applicable requirements	This would make things more enforceable and help support Attachment 1 conditions. However, we will need to careful to note that these are current versions of applicable requirements that can be modified by processes outside of Title V. And that they can't be directly modified by Title V processes, so they are outside scope of public comment. Based upon feedback with tech editors and PDS, this doesn't seem feasible for this issuance. Consider for future revisions.	

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 15	Complete	Source determination language update (STGC SoB 2.0)	STGC SoB	N/A	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Updates for anonymous comments on Perma-Fix Northwest (PFNW) source aggregation.	Current EPA guidance has specifically removed consideration of functional interrelatedness in determining adjacency, making the Renewal 3 language in Section 2.0 of the STGC SoB out of date. NWP had not updated that language in the AOP.2025.1D draft of Renewal 4. We reviewed the new guidance in late 2019/early 2020. At the time, we decided not to do a formal reconsideration of facilities like PFNW because the argument for them being part of the Hanford Site is now weaker than when the original determinations were made. If we were to formally reconsider PFNW, it would still be a separate source due to properties owned by Framatome, Port of Benton, and the city of Richland which prevent it from being physically adjacent to/contiguous with the Hanford Site. Without functional interelatedness, there is no argument that it is contiguous or adjacent. Not revisiting these determinations is consistent with the 2019 EPA guidance. EPA stated that they didn't think it would be appropriate for permitting agencies to revisit previous determinations. So we have no need to formally review, and potentially drop, any facilities that might have been combined with the Hanford Site due to functional interrelatedness. And there is no point formally reviewing facilities which were already considered separate because the current guidance is weaker. The best solution is to add language to Section 2.0 of the Statement which addresses the current adjacency guidance for all future determinations and keep Renewal 3 language to explain how previous determinations were made. New language should make it clear that we were following the appropriate guidance at the time, but we need to drop functional interrelatedness going forward.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 16	Complete	RCW 70.92 citation update for public comment.	STGC SoB	N/A	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Public comment by Bill Green noted a citation correction for STGC SoB, Pg. iv	Citation to RCW 70.92 is incorrect and should be RCW 70A.388. This was likley originally a typo, intending to be 70.98, which was then recodified as 70A.388.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 17	Complete	Straightforward DOE Comment Fixes	STGC, Att. 1	19, 23 25, 26, 32, 35, 82, 105, 116, 120	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	DOE Comment 1 - DP 1.4.23 typo	Typo in DP 1.4.23 dangerous waste condition reference should be corrected. Unit-specific conditions are in III for dangerous waste.	Yes
2	DOE Comment 11 - Att. 1, Section 1.0, Heading	Word file for AOP.2025.1D appears to be correct, but typo shows up in public notice PDF. Likely introduced during tech editing. Fix if it is in the working file, once that is provided by PDS.	Maybe (Must Check Working File When PDS Provides)
3	DOE Comment 12 - Att. 1, Section 1.0, Definition for "Ecology"	Word file for AOP.2025.1D appears to be correct, but a hard return is missing before "Ecology" on line 25. Likely introduced during tech editing. Fix if it is in the working file, once that is provided by PDS.	Maybe (Must Check Working File When PDS Provides)
4	DOE Comment 14 - DP 1.4.19, Condition (1)	DP 1.4.19 Condition (1) does have incorrect references to Figure 1, instead of Figure A-1, of DE07NWP-003, Rev. 2.	Yes
5	DOE Comment 15 - DP 1.4.19, Condition (2)	DP 1.4.19 Condition (2) does have incorrect references to Figure A-2, instead of Figure A-1, of DE07NWP-003, Rev. 2	Yes
6	DOE Comment 16 - DP 1.4.19, Condition (4)	Word file for AOP.2025.1D appears to be correct, but there is an indentation/style issue on the last line of DP 1.4.19. Need to check underlying format of working file, once that is provided by PDS.	Maybe (Must Check Working File When PDS Provides)
7	DOE Comment 18 - DP 1.4.25, Condition (5)	With DOE acknowledgement that this waste transfer has happened and the measurement has been completed, there is no need for "if" in the AOP condition.	Yes
8	DOE Comment 19 - DP 1.4.25, Condition (8)	Approval Condition 2.5 states that "Results of emission assessments conducted pursuant to Section 3.1 shall be submitted to Ecology within 90 days..." and Section 3.1 is specific to baseline assessments. Section 3.2 addresses "Bi-Annual Emission Assessment" and 3.3 has "Source Demonstration Assessment." It appears that the Section 3.2 and 3.3 assessments don't need to be transmitted to Ecology directly. Only the "baseline" assessments in 3.1 needs to be transmitted. This doesn't seem to be a mistake, as Revision 1 had the same reporting requrement which excluded Section 3.2 (3.3 did not exist in Revision 1). We should have considered whether to broaden that in Revision 2, so assume it was intentional.	Yes
9	DOE Comment 20 - DP 1.4.26, DP name	Single in name is misspelled and should be fixed.	Yes
10	DOE Comment 23 - DP 1.4.32, Condition (3)	As written, this would technically seem to apply to any TAP limits in the AOP. Best to make it specific to the underlying approval order.	Yes
11	DOE Comment 25 - DP 1.4.32, Condition (5)	DOE suggestion to add analysis here lines up better with the language in DE11NWP-001, Rev. 4, and seems to make the condition slighlty more stringent.	Yes
12	DOE Comment 26 - DP 1.4.35, Condition (1)	Hyphen is missing in one case of "asbestos-containing" in Condition (1)	Yes
13	DOE Comment 29 - DP 1.4.82, Conditions (4), (5), (6), (7), and (8)	Comment is correct, DE18NWP-001 states that "Ecology reserves the right to provide comments or corrections to the SAP" but doesn't say we need to approve it.	Yes
14	DOE Comment 30 - DP 1.4.82, Condition (6)	Comment is correct. AOP condition correctly identifies the sampling as annual but the qualifier about no waste disturbing activities incorrectly has month.	Yes
15	DOE Comment 31 - DP 1.4.105, Table 1.4.105.1	Comment is correct, table has an extra ".1" in the name. The reference in Condition (1) has the correct name.	Yes
16	DOE Comment 33 - DP 1.4.116, Conditions (3) and (5)	Comment is correct. DE19NPW-003 states "Ecology reserves the right to provide comments or corrections to the SAP" but does not require approval.	Yes
17	DOE Comment 34 - DP 1.4.116, Condition (4)	Streamlining to just "elemental mercury" was likely not ideal. As noted in (A), they're supposed to be looking at results for "mercury, total mercury compounds, or any specific mercury compound." The compliance demonstration is for elemental mercury as a TAP, but the demonstration is structured to make sure they're considering any results which might contain mercury in their testing.	Yes
18	DOE Comment 35 - DP 1.4.116, Condition (4)	Streamlining to just "elemental mercury" was likely not ideal. As noted in (A), they're supposed to be looking at results for "mercury, total mercury compounds, or any specific mercury compound." The compliance demonstration is for elemental mercury as a TAP, but the demonstration is structured to make sure they're considering any results which might contain mercury in their testing.	Yes
19	DOE Comment 36 - DP 1.4.116, Condition (6)	This is a reasonable suggestion. Specific recordkeeping is laid out in the "Condition:" section, so no need to repeat everything fully, but it is potentially confusing/inaccurate to say there aren't any records required.	Yes
20	DOE Comment 41 - DP 1.4.120, AEI	Good to add, if the permittee has an AEI associated with this DP.	Yes
21	DOE Comment 45 - STGC 5.2.2	Good to update this reference to the current official version that we make avaialble on our website.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 18	Complete	Consideration of DOE comments on Method 9 "Quantification" and 18-minute observation language	Att. 1	14, 16, 17, 20, 23, 24,26, 28, 29 81, 82, 117, 118	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	DOE comments 21, 27, 28, 37, 39, and 40 request removal of "quantification" regarding Method 9.	The concept of "quantification" is covered by EPA Method 9 itself, so it can also be dropped or converted to "determination" in Attachment 1 (Table 1.1, discharge points in Section 1.4, and Secton 2.1). For discharge points in Section 1.4, the "if triggered" language is effectively covered by the reference to "Section 2.1, Tier 3 Visible Emissions Survey requirements" under the Periodic Monitoring block. It can also be dropped.	Yes
2	Consider DOE comment #8 on requirement to do Ecy Method 9A for at least 18 minutes	Cited language inAttachment 1, Section 2.1, of the AOP.2026.1D draft was an attempt to bridge the default EPA Method 9 observations (6-minute readings, three replicates) with Ecology Method 9A (one hour of readings). The idea was that when we required EPA Method 9 it could also be used as periodic monitoring for WAC 173-400-040(2). -040(2) specifies Ecology Method 9A, but does not provide any frequency for periodic monitoring. That means we potentially need to gap fill in the AOP under WAC 173-401-615(1)(b). The idea was that 18 minutes of opacity observation with EPA Method 9 would be reasonably sufficient for WAC 173-400-040(2), without always requiring the full hour of readings for Ecology Method 9A. But it was entirely a gap-filling creation within the AOP and the most defensible approach is just to require a full Ecology Method 9A. Attachment 1, Section 2.1, has been significantly updated to require that full-length EPA Method 9, EPA Method 22, and Ecology Method 9A readings be done when required. DOE's suggested change is not viable given that it violates the minimum procedures for Method 22. The method requires a minimum of 6 minutes of observations. Method 22 also includes rest breaks for the observer every 15 to 20 minutes. Setting the time period at a minimum of 18 minutes creates the potential for triggering a rest break.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 19	Complete	DOE Engine Comments & NSPS/NESHAP relocation to new Sections 2.10-2.12	Att. 1	ZZZZ: 10, 11, 16, 17, 18, 23, 49, 50, 51, 52, 53, 57, 61, 62, 73, 92, 93, 119 IIII: 24, 29, 39, 64, 65, 66, 67, 68, 70, 72, 75, 79 (Noted no DPF in header), 83, 84, 85, 86, 87, 88, 89, 90, 94, 95, 96, 97, 98, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 118, 120, 121 JJJJ: 24, 44, 45, 91, 102, 103, 104	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Consider DOE comments #3, #4, and #43 for engines	Adding more information on oil analysis program makes sense (comment #3), but comment #4 shows misunderstanding of 40 CFR Part 63, Subpart ZZZZ requirements. And comment #43 gets us down the road of having extra variation in "standard" engine conditions. From an enforceability standpoint, what would likely be best is to use the Section 1.4 DPs to address what is unique/different about each engine, including conditions from approval orders and specific details like lacking a diesel particulate filter for DOE comment #43. The standard conditions for how the Hanford Site complies with federal requirements for engines can then be moved to the new Sections 2.10, 2.11, and 2.11 so they aren't repeated dozens of times in different DPs. Each DP can have brief references to the correct section(s) with the standard engine conditions that must be met.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 20	Hold/Delay Review	Shifting boiler and turbine NSPS/NESHAP to new subsection in Section 2.	Att. 1	TBD	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Potentially standardized conditions can be set up for federal boiler and turbine standards, similar to the ones for engines.	Boilers are likley too complicated to standardize at this time, due to 40 CFR Part 63, Subpart DDDDD. Turbine conditions will be of very limited usefulness, all we have are the WTP ones that will likely never be constructed.	

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 21	Complete	Correction of "NSR exempt (historical)" language	Att. 1	10, 11, 35, 36, 49, 50, 51, 53	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Correction of "NSR exempt (historical)" language	It's potentially inaccurate to say that older equipment without an approval order was exempt from NSR. Equipment may have been subject and the approval was just very basic. Or we may have just lost track of an approval order over the years. It would likely be best to say something like "No NSR authorization identified (historical equipment)"	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 22	Complete	Updating discussion of Att. 1 SoB models & historical boiler source testing.	Att. 1, Att. 1 SoB	All	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Updating text regarding calculation models in Att. 1 and SoB	DOE Comment #46 suggested language noting EPA hierarchy of methods for determining emissions (stack testing down to emission factors) in the SoB language regarding calculation models. That is helpful, but most of these models are no longer in use anyway. Best to significantly clean up this section at the same time.	Yes
2	Updating historical boiler conditions regarding source tests methods/schedules to point to Section 2.6	For the historical boilers, it would make more sense to point to Section 2.6 to explain testing instead of saying that Ecology might require testing under WAC 173-400-105(4). Note that there is a separate Item 13 to potentially address languag in that section regarding the history of this requirement. We can still require testing again under this provision, just like for another other DP. The language was included to help explain why a test method was specified when there isn't a testing schedule.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 23	Complete	Removing "Test Method/Frequency" lines when they aren't related to condition content, consistently citing EPA methods, cleaning up WTP limits	Att. 1	Nearly All (Except 33, 57, 61, 62, 73, 80, 95, 96, 97, 99, 100, 101, 118, 120, 121)	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Eliminating unnecessary Test Method/Test Frequency lines and updating unclear discussions	There are a ton of useless lines that say Test Method/Test Frequency is not applicable when the condition itself is clearly not about testing. But we don't consistntly include these lines in every condition, so it's not a set format. If we don't include them every single time, we should at least be consistent about removing them when they aren't relavent. Some of these lines have also been confusing for readers, especially when an underlying approval order specified a test method but did not specify a testing frequency (or it was a one-time intiial test taht has been conducted already). These could be significantly updated to better explain why a test method is named with no frequency.	Yes
2	Defining abbreviation for all Ecology/EPA methods cited in Attachment 1	Issue raised with DOE comment 13, pointing out EPA Method 202 incorrectly cited to 40 CFR 60 rather than 40 CFR 51. Currrently we are inconsistent on EPA method citations. With the fact that we are citing these methods many times across discharge points, it would likely be easiest to just move them all to the abbreviation table so we can consistently say "EPA Method X" in the rest of Attachment 1	Yes
3	WTP particulate matter testing language is inconsistent and potentially confusing.	It looks like language updates for PM testing at WTP in the AOP.2025.1D draft were actually gramatically incorrect. In DP 1.4.23, we sometimes said 'Method 5 and 201/201A for the front half' (Conditions 12, 16, 17) and sometimes 'Method 5, Method 201 or 201A for the front half' (Conditions 19 and 22). The latter can be interpreted as any of the three, the former would be 5 and one of the next two. PSD-02-01, Amendment 3, uses the following language: *"Compliance shall be determined by testing for PM10 only using 40 CFR 60 Appendix A, Method 5, 40 CFR 51 Appendix M Method 201 or 201A for the front half analysis and* *40 CFR 51 Appendix M Method 202 for the back half."* Method 5 is general filterable PM, Method 201 is filterable PM10, and Method 201A is filterable PM10/PM2.5. Method 202 is the condensable PM fraction. It makes sense that the PSD permit, which established a PM10 limit that covers both filterable and condensible fractions, would allow for any of those three filterable methods to be used in conjunction with the condensable method. It would not make sense to do both Method 5 and Method 201 together. Updating language to make that testing clearer.	Yes
4	Some oxygen correction factors in DP 1.4.23 are unnecessary/nonsensical.	Oxygen correction factors are only needed for concentration-based limits (e.g., ppm), in order to prevent extra air added/leaking in from from diluting the pollutant enough to pass when it wouldn't otherwise. Mass rate limits (e.g., lb/hour or lb/MMBtu) don't need a correction because extra air will cancel out. If you add enough air to halve the concentration, it also doubles the volume that you need to determine to get the total pounds of material coming out. Mass rate limits can have problems if emissions are leaking out of the system, but that just splits your emission streams and doesn't change the stack concentration in a useful way.	Yes
5	There has been confusion about the DP 1.4.23 "or" limits and whether they both need to be met.	BNI has confirmed with PSD team that they agree that both versions of a limit need to be met when the PSD permit says or. Adding "(both limits must be met)" to these conditions in the AOP will help make this clear. Also changing the format on the"or" from bold, underline, and italic to just normal text will make it stand out less.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 24	Complete	Removal of DP 1.4.38, 100K Water Treatment Plant engine, and DP 1.3.73, WTP South-40 Laydown Yard Laborer's Tent	Att. 1	38, 73	25-ECD-0135; 26-ECD-0032

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	DOE has requested removal of DP 1.4.38 for closure	Engine location was not inspected for disconnection, was operational on August 1, 2024, for inspection 24.AQ03. However, the new Central Plateau Water Treatment Facility makes the old water treatment plant redundant. Considering OK to draft removal without inspection of old location, but follow up with closeout inspection. For Table 1.4.1, we should use the DP name in Renewal 3 (100K Water Treatment Plant), rather than what we have in the AOP.2025.1D draft Renewal 4.	Yes
2	DOE has requested removal of DP 1.4.73 for closure	Engine location was not inspected for disconnection, was operational on July 17, 2025, for inspection 25.AQ05. However, this engine was removed at the same time as the South-40 OE Tent engine which was subject to a compliance action related to maintenance issues. Review of this situation and follow-up should be sufficient to ensure removal is confirmed. For Table 1.4.1, we should use the DP name in Renewal 3 (WTP MHF South-40 Laydown Yard Laborers Tent), rather than what we have in the AOP.2025.1D draft Renewal 4.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 25	Complete	OPC engines w/o approval order updates	Att. 1	57; New (103, 122, 123, 124))	25-ECD-0144, 25-ECD-0145; 26-ECD-0016; 26-ECD-0018; 26-ECD-0061

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	New engine for 25-ECD-0144	Addition of DP 1.4.122	Yes
2	New engine for 25-ECD-0145	Addition of DP 1.4.123	Yes
3	Removal of engine for 26-ECD-0016	Requests removal of DP 1.4.57. This engine was in place for 25.AQ05 inspection on 7/17/25, but is trailer mounted and has been reported as going back to storage. Material Handling Facility will be regularly inspected for engines, removal of DP should be OK without a specific inspection.	Yes
4	Removal of engine for 26-ECD-0018	Request to add the engine came in with Letter 22-ECD-000046. It was added to the AOP.2025.1D draft of Renewal 4 as DP 1.4.103. Should be removed from th AOP.2026.1D draft, but it would be best to reserve the DP number so that there is no future confusion. That is what we did for DP 1.4.69, which only existed in drafts of Renewal 3.	Yes
5	New engines for 26-ECD-0061	Addition of DP 1.4.124	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 26	No Revisions Proposed	Combined w/Item 23 - Filterable PM test method language inconsistent, potentially needs another update	Att. 1	23	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	WTP particulate matter testing language is inconsistent and potentially confusing.	Moved to Item 23, Change 3	

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 27	No Revisions Proposed	Consider whether we need some sort of supersedence language for Renewal 3 (or if that language exists and needs to be updated)			

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Consider adding language specifically superseding previous AOP versions	Checked Industrial Section AOPs and couldn't find any supersedence/recision language. With prominent expiration dates on all the documents this likely isn't a big enough issue to try to restructure the STGC.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 28	Complete	Cover/intro pages are very inconsistent, especially SoBs	All	N/A	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Cover pages, background, etc. are inconsistent. This affects Statements of Basis in particular.	Significantly restructured the title page/abbreviations/introduction/background/headers/etc. for each document to make them more consistent.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 29	Complete	Addition of NSPS KKKKa for turbines	Att. 1	23	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Addressing updated federal regulations for stationary combustion and gas turbines	EPA Finalized 40 CFR Part 60, Subpart KKKKa, for stationary combustion and gas turbines for which construction/reconstruction/modification commenced after 12/13/2024. If the turbines are added in the future, they will be subject to the newer subpart. Just like with the original Subpart KKKK, emergency turbines are exempt from the NO_x standard [40 CFR 60.4320a(c)(1)]. They are subject to the SO_2 standard, which requires at least one initial performance test under 40 CFR 60.4333a(d) and then vendor documentation of ULSD or fuel analysis could be used going forward (or CEMS/annual testing, but no reason why DOE would take that route). EPA Method 6C testing is already required for the turbines in the AOP, which is one of the potential methods listed in 40 CFR 60.4415a(b)(1). So they already have the testing and fuel documention needed in established AOP conditions. The requirement to operate and maintain turbine/control/monitoring equipment in a manner consistent with good air pollution control practices [40 CFR 60.4333a(a)] is likley covered well enough by general conditions/other supporting requirements in the AOP.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 30	Hold/Delay Review	Consider changing text at end of Att. 1 SoB, Section 1.4, regarding discontinuing requirements for "obsolete" approval orders			

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1		Att. 1 SoB, Section 1.4, states that DOE is not required to continue complying with requirements from "obsolete" approval orders for equipment which no longer operates. Shawn Nolph has pointed out that other programs/offices may be requiring that records continue to be generated which identify that a requirement wasn't met because the equipment was gone. We may want to move in that direction, but would likely also need to consider STGC 5.8, regarding shutdown of equipment, to make sure we are consistent.	

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 31	Complete	Removal/modification of AOP conditions listing specific test methods, with no testing frequency, for historical boilers and engines	Att. 1	2, 3, 7, 8	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Reconsideration of conditions for boiler testing from 97NM-138 in AOP DPs 1.4.2, 1.4.3, 1.4.7, and 1.4.8	We should add references to Section 2.6 and 2.13 where the "Test Frequency" line references WAC 173-400-105(4) currently because we do have a test frequncy. But that leaves out DP 1.4.3, which doesn't have numerical limit conditions. So we should also add a very basic AOP condition to all of these DPs (2, 3, 7, and 8) for 97NM-138 source testing in general.	Yes
2	Reconsideration of NWP-96-1 limit/testing incorporation into AOP DPs 1.4.16 and 1.4.17 See Hanford Challenge comment O-1-4	The NOx limits (75.5 lb/hr in DP 1.4.16, AOP Condition 2, and 42 lb/hr in DP 1.4.17, AOP Condition 2) and citing EPA Method 7A both seem to be valid from Approval Condition 1 of NWP-96-1. It also seems valid to have a WAC 173-400-105(4) reference as to when they might be required to test again. In 2001, the original AOP already had a testing frequency of "Not Applicable" and referenced Calculation Method 2B with fuel tracking. That looks like gap filling under WAC 173-401-615(1)(b). It would be very reasonable to create periodic monitoring if the approval order only required initial testing that was already done. But I don't think we can say with certainty that testing did occur. No record of testing was found in NWP or DOE/HMIS records, but we are so far beyond the requirement to keep such records that the records may just be gone. The approval order condition allows for "an equivalent method approved by the department." Typically, that would allow for a different source test method (e.g.,EPA Method 7E instead of 7A). But there is a nonzero chance that the fuel tracking itself was approved as the "equivalent method" in the late 90s and then pulled into the AOP. In either case, the evidence indicates that Ecology was satisfied with the state of testing for DP 1.4.16 and 1.4.17 in 2001. We could potentially decide that new testing is necessary under WAC 173-400-105(4), but that isn't a current applicable requirement that needs to go into the AOP. MFW 5/28/26: Item 34 is updating "Condition Approval" lines to "Applicable Requirement Source." That will potentially identify gap filling via WAC 173-401-615(1)(b), including for these DPs.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 32	Complete	Condition updates for for WTP: DE02NWP-002, Rev 4.	Att. 1	23	DE02NWP-002, Rev. 4; DE02NWP-002, Rev. 4, Technical Support Document

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Update DP 1.4.23 for DE02NWP-002, Rev. 4	Updates for the approval order (DE02NWP-002, Rev. 4) are complicated by AOP conditions for requirements from PSD permit and federal regulations which are not changing. Significantly updated how conditions were structured to both identify the current requirements from DE02NWP-002, Rev. 4, and distinguish them from the PSD permit and direct regulatory requirements.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 33	Complete	New conditions for LERF/ETF: Approval Order DE07NWP-003, Rev. 3	Att. 1	19	DE07NWP-003, Rev. 3; DE07NWP-003, Rev. 3, Technical Support Document

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Incorporate language changes from DE07NWP-003, Rev. 3	Updated DP 1.4.19 for the current approval order conditions	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 34	Complete	Making current "Condition Approval" lines more understandable	Att. 1	All	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Update of "Condition Approval" lines	It likely isn't obvious to a reader that the dates were (generally) when a requirement was first established in an approval order. Or not including a date when it's a regulatory requirement directly from WAC/CFR. It would be more helpful to name the current source of the applicable requirement so a reader knows where to start looking, rather than providing a date that's only useful if you're already looking through every historical version of an approval order to match it up. Conditions for DP 1.4.23 (WTP), which are being drafted separately under Item 32, would be significantly improved with source references. In Renewal 3, there were a mess of duplicative conditions from the PSD permit, approval order, and federal regulations. In some cases the same requirement/limit was repeated in multiple AOP conditions, sometimes with different averaging periods or other language tweaks, because it's in both the PSD permit and approval order. But it's not immediately obvious why there would be a 11/24/2003 condition requiring engines/boilers/etc. use ultra-low sulfur diesel and a 10/10/2005 condition also requiring that they use ultra-low sulfur fuel when neither of those is the current issuance date for the PSD permit/AO. We can also potentially fold some of those conditions together when they're essentially the same and reference both sources. We've already done that for the historical boilers (DPs 1.4.1-1.4.9) where tune-ups for the approval order also satisfied NESHAP Subpart DDDDD requirements, so we just added a little NESHAP text to the condition. Ideally, each AOP condition would have a reference mapping to the specific approval condition or CFR citation, but that likly isn't possible with the amount of streamlining in place. Even just getting in the general source is a big improvement.	Yes
2	Adding WAC 173-401-615(1)(b) citation to new "Applicable Requirement Source" citation when requirements are gap filled.	Excluding DP 1.4.23 for draft language (planned in conditions under Item 32). For other discharge points we should make a reasonable attempt to identify where gap filling might be used. Two identified cases are the NOx limits for DPs 1.4.16 and 1.4.17. They seem to have been gap filled from initial source testing to fuel tracking and a calculation in the original AOP issuance. The Section 2.1 visible emission surveys are also likely gap filling, at least for most units. Some of the newest approval orders (DPs 116 and 117) baked these requirements into the order well enough to not consider it gap filling. But the older ones did not do that when they specified 5%/10% opacity limits, pointed to WAC 173-400-040, or (sometimes) even just referenced AOP Section 2.1 directly.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 35	Complete	Updating Periodic Monitoring lines with "Not applicable" when maintenance checks or source testing are specified in the condition	Att. 1	2, 3, 7, 8, 117	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Periodic Monitoring line updates	The AOP sometimes says periodic monitoring is not applicable when there actually is periodic monitoring such as source testing, maintenance, condition checks, etc. These are updated to more clearly show that monitoring does exist.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 36	Complete	Updating STGC 5.16.3 regarding WAC 173-401-645 and affirmative defense	STGC	N/A	

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Reconsideration of affirmative defense in STGC Section 5.16.3	In 2025, Ecology removed WAC 173-401-645 (affirmative defense) from our regulations on the instruction of EPA. It was supposed to be dropped from our Title V permits, but that change did not make it into the AOP.2025.1D draft. In 2026, EPA returned affirmative defense to CFR (https://www.epa.gov/newsreleases/epa-withdraws-biden-era-2023-affirmative-defense-rule-restoring-protections-energy-and). But it is no longer in WAC for Ecology to enforce. According to MengChiu Lim, NACAA call discussing the matter with EPA confirmed that EPA was OK if states did not include affirmative defense in an AOP if the state regulations had dropped it. Based upon this, we should remove STGC 5.16.3 to align with current state regulations.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 37	Complete	Conversion of "shall" to "must" or "will"	STGC, STGC SoB, Att. 1, Att 1. SoB, Att. 2 SoB, Att. 3	All	Response to Comments for AOP.2025.1D draft

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Consistency in must vs. shall in STGC	ECY guidance in recent years is to use "must" in approval orders. But it acknowledges that both must and shall have been used over the years. There is no specific guidance on AOP content, so very often the conditions have just quoted what was used in the underlying approval order or regulation. This has led to an inconsistent mix of both must and shall. We converted a lot of the references from shall to must in the AOP.2025.1D draft of Renewal 4 already. Converting as many remaining uses to must as possible, unless there is a very specific reason to leave shall like quoting a regulation.	Yes
2	Consistency in must vs. shall in Attachment 1	See above for Item 37, Change 1. Note that DOE comment #32 touched on being consistent with an underlying approval order. If we tried to do that in each case, the AOP would be extremely inconsistent as we have bounced between must and shall over the years.	Yes
3	Consistency in must vs. shall in Attachment 2	Attachment 2 uses shall a lot, but we don't have direct authority over FF-01 and the difference isn't important enough to try to get Health to change.	No
4	Consistency in must vs. shall in Attachment 2, Att. A.	No current uses of must or shall.	No
5	Consistency in must vs. shall in Attachment 3	Only uses must once, no shalls.	No
6	Consistency in must vs. shall in Statement for STGC	See above for Item 37, Change 1.	Yes
7	Consistency in must vs. shall in Statement for Attachment 1	See above for Item 37, Change 1.	Yes
8	Consistency in must vs. shall in Statement for Attachment 2	See above for Item 37, Change 1.	Yes
9	Consistency in must vs. shall in Statement for Attachment 3	No uses of shall.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 38	Hold/Delay Review	STGC 5.2.c states we will provide a "reasonable advance notice" where controlled access areas will be entered. Consider setting a specific minimimum (e.g., 1 business day) instead.			

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Modification of ECY inspection notification warning for controlled access areas.	Adding a specific warning timeline prevents Ecology from doing unannounced inspections if they involve controlled access areas. Specifying nubmer of days just makes that worse. If anything, this condition could be removed entirely as it is not a requirement on the permittee. Hold for future review of removal, do not add language which will restrict inspections further.	No

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 39	Complete	DE07NWP-004 has two clear limits/conditions that don't seem to be addressed in DP 1.4.30.	Att. 1	30	DE07NWP-004

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Approval Condition 1.3.1 has 5% opacity limit that is not identified in the AOP.	Need to add the opacity limit to the AOP. Approval Condition 3.0 has a schedule of checking opacity from diesel heaters that steps down to only requiring a visual emissions survey when emissions are observed. This should be connected to Attachment 1, Section 2.1, Tier 3.	Yes
2	Approval Condition 1.3.3 has diesel sulfur limit that is not addressed in the AOP	In theory, this might be met by generic "implementation of vendor-recommended combustion and maintenance practices" as BACT/tBACT if we confirmed it was in recommendations. But that seems pretty weak, when we could easily just say use ULSF and/or ULSD. We could also fix Condition 1 so the annual fuel limits aren't identified just in the "Periodic Monitoring" section.	Yes
3	Header could provide more detail on "portable climate control equipment."	We should add reviewed counts and capacities, as identified in Findings 7 and 9.	Yes

Item #	Review Status	Brief Description	Revised Doc(s)	Affected DP(s)	Supporting Documents
Item 40	Complete	Updating confusing references to additional approval orders in DP 1.4.81.	Att. 1	81	DE14NWP-001

Change #	Change/Issue Description	Research/Discussion/Concerns/Suggestion Notes	Revise AOP?
1	Updates to references to another approval order which might set an alternative ammonia/opacity limit	In the AOP.2025.1D draft, DP 1.4.81 Conditions 1 and 3 had references to DE11NWP-001. This was intentional, but potentially confusing. The references have now been removed. The Permittee must still meet the most stringent ammonia or opacity limit which applies to a tank farm if they operate the sampling system in high purge mode, as authorized by DE14NWP-001 and addressed in AOP DP 1.4.81. High purge mode sampling is authorized by Approval Order DE14NWP-001. If this sampling is conducted, it would occur in a tank farm that has a separate authorization for active ventilation. The other approval order might have emission limits which are more or less stringent than DE14NWP-001 itself. Some consideration of this was written into DE14NWP-001, but it was not done in an ideal way. When high purge mode sampling occurs in a tank farm with exhausters covered by DE11NWP-001, Rev. 1, the ammonia limit is supposed to be the limit identified in that approval order. DE14NWP-001, Rev. 1, essentially adopts the ammonia limit established by DE11NWP-001, Rev. 1. DE14NWP-001 also established a 3.83 lb/day ammonia limit for high purge mode sampling in tank farms with exhausters that are not covered by DE11NWP-001, Rev. 1. This limit essentially takes over in all other cases. However, if there were a more stringent ammonia limit for that particular tank farm it would still take precedence over the less stringent requirement from DE14NWP-001. The Permittee must meet the most stringent limit, even if this were not specifically identified in DP 1.4.81. DE11NWP-001 is now on Revision 4, so there are no tank farms covered by the Revision 1 version. Everything is now subject to the 3.83 lb/day ammonia limit, or a more stringent limit if it exists. Therefore, there is no need to identify DE11NWP-001, Rev. 1, in the DP 1.4.81 ammonia limit condition. When preparing the AOP.2025.1D draft, a similar concern was identified with the 5% opacity limit of DE14NWP-001. Theoretically, a tank farm might have a more stringent opacity limit that would take precedence. The reference to DE11NWP-001 was provided as a generic example of an approval order for active ventilation in tank farms, even though DE11NWP-001, Revision 4, has a 5% opacity limit as well. All tank farm opacity limits are currently set at 5%, so there is no need for the extra complication by providing a generic approval order name. The text regarding a more stringent opacity requirement has also been removed from DP 1.4.81, AOP Condition 3, in the AOP.2026.1D draft.	Yes