HANFORD AIR OPERATING PERMIT
PERMIT NUMBER 00-05-006
RENEWAL 3
ADDENDUM A

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY (ECOLOGY)
NUCLEAR WASTE PROGRAM
3100 PORT OF BENTON BLVD.
RICHLAND, WASHINGTON 99354
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HANFORD AIR OPERATING PERMIT
PERMIT NUMBER 00-05-006
RENEWAL 3
ADDENDUM A

Number: 00-05-006 (Hanford AOP Renewal 3)

State of Washington Department of Ecology (Ecology)
Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, Washington 99354

The permittee is authorized to operate the air emission units identified in this Air Operating Permit Number 00-05-006 and all insignificant emission units not specifically identified in this permit.
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1.0 THE ENVIRONMENTAL PROTECTION AGENCY ORDER TO ECOLOGY

The Environmental Protection Agency (EPA) issued an Order on May 29, 2015, granting in part and denying in part two petitions for objection to permits 00-05-006, Renewal 2, and 00-05-006, Renewal 2, Revision A (the Hanford Air Operating Permit Renewal 2 and Revision A). The Order is attached as Exhibit F.

The EPA granted Claim 3B “… the Petitioner’s request to object to the Hanford Title V Permit on the basis that Ecology’s record is inadequate with respect to addressing Subpart H in the Hanford Title V Permit.” The EPA also proposed a number of options that could be used to address this inadequacy. Additionally, the EPA clarified the scope of judicial review in a discussion under Claim 4.

The State of Washington Department of Ecology (Ecology) and State of Washington Department of Health (Health) discussed the findings of the Order and selected to implement one of the suggestions in the Order. Ecology will “attach an addendum to the Hanford Title V Permit to correct any omissions or errors – if any – contained in the license with respect to Subpart H, since Ecology also has authority to enforce the NESHAP.”

This addendum to the Hanford Title V Permit will be located in the Attachment 2 Section of the permit. The addendum will contain requirements that the Permittee will have to abide by in addition to the requirements in Attachment 2. Health will use the addendum in Attachment 2 to correct the underlying radiological air emission license(s) (RAEL) in the next revision of the Hanford RAEL (FF-01). The Addendum will be named “Addendum A.”

1.1 Section 3.0

For the purpose of this Title V permit, the header statement of Section 3.0 of the FF-01 license in Attachment 2 has been revised to state "State Enforceable ONLY (Except when 40CFR referenced)."

Figure 1 shows the replaced page in the FF-01 license with the new text.
State Enforceable ONLY

(Except when 40CFR referenced)

3.0 WAC 246-247 (June 13, 2017)

3.1 Applicability

The standards and requirements of this chapter apply to point sources, nonpoint sources, and fugitive emissions. (WAC 246-247-010(2))

The standards and requirements of this chapter apply to stationary and mobile emission units, whether temporary or permanent. (WAC 246-247-010(3))

The control technology standards and requirements of this chapter apply to the abatement technology and indication devices of facilities and emission units subject to this chapter. Control technology requirements apply from entry of radionuclides into the ventilated vapor space to the point of release to the environment. (WAC 246-247-010(4))

3.2 Exemptions

The following types of facilities or sources of radiation are exempt from the requirements of this chapter because they release no airborne radioactivity, or they prima facie comply with the standards in WAC 246-247-040, or they are already adequately regulated under other requirements:

(a) Users of only sealed sources;
(b) Sealed sources;
(c) Accelerators less than 200 MeV;
(d) Nuclear powered vessels underway or moored dockside unless under a maintenance condition with a potential-to-emit;
(e) Uranium mill tailings piles disposed of under 40 CFR Part 192 (WAC 246-247-020(11))

Any exemptions shall be consistent with 40 CFR 61. No exemptions from the standards in WAC 246-247-040 will be granted.

A federal facility may request exemption from some of the requirements of WAC 246-247-060 and 246-247-075 if the potential-to-emit, for the emission unit(s) under consideration, results in a TEDE to the MEL from all pathways less than 0.1 mrem/yr. (WAC 246-247-020(0))

10/20/2017

Figure 1: Replaced FF-01 Page
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