

Desk Instruction 2.7 “Air Permitting”

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Revision 0

Approved by: _____

Date: _____

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1.0 Introduction

This instruction applies to the role of ESQ Environmental Division (ED) regulatory compliance and permit program management relative to the *Clean Air Act*. This includes working to find the most efficient and effective method of reducing emissions of Toxic Air Pollutants (TAP), radiological air pollutants and chlorofluorohydrocarbons (CFC).

The Washington Department of Ecology (Ecology) has authority to regulate the Federal Clean Air Act at Hanford, and dictates toxic air pollution (TAP) regulations and criteria for the Waste Treatment Plant and Tank Farm Projects. These regulations are implemented under the existing New Source Review and Notice of Construction (NOC) Program. The regulations are found in Washington Administrative Code (WAC) 173400, 401 and 460. Washington State Department of Health regulates radioactive air emissions under WAC 246-247.

2.0 Expectations

- a. ED serves as the Clean Air Act regulatory compliance function for the Office of River Protection.
- b. ED is responsible for ensuring that regulations are properly and accurately interpreted in implementing documents, comments and responses to the regulatory agencies and in permits and permit supporting documents. As the Clean Air Act regulatory compliance function for the site, ED is responsible for the interpretative activities defined in other sub-elements of 01.02.04 for the Office of River Protection.

3.0 Application

This instruction applies to ORP employees having involvement in the preparation, review, or transmittal of environmental permit applications. This instruction also applies to ORP employees responsible for facilities and operations affected by the information covered in the applications.

4.0 Procedure and Process

Obtain, renew, and modify environmental permits following the steps below. A flow diagram of the process is also provided in Exhibit 1, page 3.

Step #	Description	Performer	Support
Step 1	Receive draft permit application from contractor.	Contracting Officer and Contracting Officer's Representative (ED	N/A

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		SME)	
Step 2	Distribute draft permit application to the appropriate Environmental Subject Matter Expert and Mission Elements (ORP line management) based on the scope of the permit application.	Contracting Officer and Contracting Officer's Representative (ED SME)	N/A
Step 3	ED SME reviews draft permit application based on the scope of the permit application.	ED SME	Mission Elements (ORP Line Management)
Step 4	Review the permit application for acceptability (using appropriate guidance and regulatory review criteria).	ED SME	N/A
Step 5	If information is not acceptable, Contractor reworks the application based on ED SME direction. Contractor re-submits application to ORP.	ED SME	N/A
Step 6	Brief ORP Manager as required.	ED SME	Assistant Manager and/or Mission Element Lead
Step 7	Obtain ORP certification signatures for permit application, as needed.	ED SME	Mission Elements
Step 8	Use the Outgoing Correspondence procedure to prepare transmittal letters and submit permit application to regulatory agency.	ED SME	Mission Elements
Step 9	Receive draft permit from regulatory agency.	ED SME	N/A
Step 10	ED SME and contractor team review draft permit based on the scope of the permit.	ED SME	Mission Elements
Step 11	Submit draft permit comments to regulatory agency.	ED SME	N/A

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Step 12	Discuss and finalize permit comments with regulatory agency.	ED SME	N/A
Step 13	Discuss and finalize comments.	ED SME	N/A
Step 14	Receive final permit from regulatory agency.	ED SME	N/A
Step 15	Review final permit.	ED SME and Contractor	N/A
Step 16	<p>If permit is acceptable, ED SME faxes approval acceptance to regulatory agency and project is authorized to commence.</p> <p>If permit is not acceptable, ORP interfaces with regulatory agency to resolve outstanding issues. If resolution cannot be achieved through negotiation, an official appeal process is available by law for dispute resolution.</p>	ED SME	N/A
Step 17	Distribute final permit to affected ORP Mission Elements and other interested organizations.	ED SME	Mission Elements

Exhibit I – Obtaining Permit Flow Diagram

