

Case Study 6



Streamlining Air Permitting Programs at Hanford

Hanford Background



- **Established 1943**
- **560 sq miles in Columbia River basin**
- **Former weapons production site**
- **Now an Environmental Management site**

The Challenge

Hanford was preparing 8-10 Notices of Construction (NOCs) each month to comply with CAA requirements

- **each required 4-6 months to prepare**
- **each required separate regulator review and approval**
- **estimated cost of \$1 M/year**
- **significant impact on initiating cleanups**

The Challenge

- **Much of the paper work was for standard equipment used in already approved ways**
- **Separate permits were required for standardized, routine activities such as contaminated soils removal and waste transfers**

Resolving the Challenge

- **Hanford worked with their regulators to resolve this challenge - save time and reduce funding**
- **Four streamlined processes were negotiated**
 - **Categorical Permit**
 - **Routine Activities**
 - **NOC Short Form**
 - **Monthly Meetings**

Resolving the Challenge

A Categorical Permit:

- **Standard equipment used in an already approved way does not require a new NOC**

Resolving the Challenge

A Routine Activities List:

- **Activities with the potential to emit may proceed with a single regulatory approval**
- **Specifically includes soil removal and waste transfers**

Resolving the Challenge

An NOC Short Form:

- **Informally pre-negotiated with regulators**
- **Ensures any potential problems are ironed out before formal submittal**
- **Estimated to save 200 labor hours per NOC over previous practice**

Resolving the Challenge

Monthly Routine Technical Assistance Meetings:

- **Creates a positive working environment between DOE and regulators**
- **DOE and regulators discuss projects with very low potential to emit**
- **Regulators have the authority to approve these projects at the monthly meeting**

Resolving the Challenge



- **These changes are estimated to save \$770,000/year**
- **These changes also reduce schedule risk to Hanford projects**