

#### STATE OF WASHINGTON

## ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

#### **NOTICE OF**

#### PUBLIC COMMENT OPPORTUNITY

#### FOR THE

# COLUMBIA GENERATING STATION ISSUANCE OF ORDER 873 [SYNTHETIC MINOR (AIR) PERMIT]

Notice of Public Comment Opportunity September 5, 2014 to October 6, 2014 by 5:00 pm

**Energy Northwest – Issuance of Order 873 [Synthetic Minor Permit]** 

# **Proposed Action:**

The Energy Facility Site Evaluation Council (EFSEC) is seeking public comment on Order 873, a draft synthetic minor permit to regulate air emissions from the Columbia Generating Station (CGS). The proposed permit is in the form of an administrative order. A synthetic minor permit is issued when an emissions source voluntarily limits emissions below thresholds that would require a Title V permit.

Air emissions from the CGS are currently regulated by Order 672, which was issued by EFSEC on January 8, 1996. Energy Northwest has recently installed an auxiliary boiler and additional emergency generators that trigger the need to update regulatory requirements. Order 873 supersedes Order 672 and updates permit requirements to assure consistency with current regulatory requirements.

#### **Applicant:**

Energy Northwest PO Box 968 Richland, WA 99352

## **Facility Description:**

The CGS is an operating nuclear electric generating station located approximately 10 miles north of Richland, Washington, in Benton County (<u>location map</u>), on land leased from the United States Department of Energy (DOE) on the Hanford Site. The CGS consists of a General Electric-designed boiling water reactor and nuclear steam supply system; a turbine-generator; and the necessary transformer switching and transmission facilities to deliver the plant's output to the federal electrical power distribution system at a transmission substation located near the plant. The CGS net generating capacity is 1,170 megawatts.

The project consists of the following structures: the reactor building, the radioactive waste building, the turbine-generator building, the diesel generator building, the service building, six mechanical-draft evaporative cooling towers, the circulating water pumphouse, and the river makeup water pumphouse, technical support centers. Various administrative buildings are located in Richland.

# **Description of Permit Requirements:**

The primary differences between Order No. 672 and Order No. 873 are:

- 1. Changing the calculation for compliance of the diesel generators from gallons of fuel used to hours of operations. Volumetric usage has the potential for more clerical and process errors in calculated compliance than hours of operation. Volumetric readings relied upon estimates of volume remaining in the main tank, volumes in secondary tanks, volume delivered, etc... By using non-resettable hour meters on the generators, compliance can be determined by comparing the current meter reading with past documented readings.
- 2. Changing the calculation of the annual run time limit from an annual basis to a rolling monthly basis. This change will provide better and more current information to determine if CGS is exceeding the imposed yearly limits on operation. By calculating usage month-by-month, determination of compliance will occur monthly and not once per year.
- 3. The addition of a new diesel generator operating at 100 hours per year as part of a comprehensive flexible "FLEX" response strategy being implemented by Energy Northwest and industry wide to enhance nuclear plant safety. The FLEX response strategy was developed by the nuclear industry to address the major challenges encountered at the Fukushima Daiichi power station following the 2011 earthquake and tsunami.
- 4. The addition of the new diesel generator increased emissions above the Energy Northwest self-imposed 90% threshold of the Clean Air Act's Title V program limits. To stay at the 90% threshold, the diesel fuel usage of the auxiliary boiler was reduced from 780,000 gallons in Order No. 672 to 730,000 gallons in Order No. 873. The reduced capacity is still significantly greater than historical fuel usage and was proposed by Energy Northwest.

# **Public Hearing:**

A public hearing will be held if the permitting authority determines that there is significant public interest.

## **How to Comment:**

Written comments may be submitted via mail or email at:

Stephen Posner EFSEC Manager Energy Facility Site Evaluation Council 1300 S. Evergreen Park Drive SW P.O. Box 43172 Olympia, WA 98504-3172

To be considered, comments must be received in the EFSEC office by 5:00 p.m. on October 6, 2014.

Via e-mail to: efsec@utc.wa.gov

# **Comment Response & Permit Issuance:**

The final determination for the issuance of this order will not be made until after the end of the public comment period, and consideration of all comments received pursuant to this notice. Once the final determination is made, copies of the Council's decision regarding the proposed order will be filed for review at <a href="http://www.efsec.wa.gov/default.shtm">http://www.efsec.wa.gov/default.shtm</a>. Within 30 calendar days after the final decision has been issued, any person who commented on the draft order may appeal the decision as provided in Chapter 34.05 Revised Code of Washington, to review any condition of the decision. Any person who failed to file comments or failed to participate in the public hearing on the draft may petition for administrative review only to the extent of the changes from the draft to the final approved decision.

All persons, including the applicant, who believe this approval or any condition of the proposed approval is inappropriate must raise all reasonably ascertainable issues and submit all reasonably available arguments supporting their position in writing by the end of the comment period. Any supporting materials which are submitted shall be provided in full and may not be incorporated by reference, unless they are already part of the administrative record for this proposed approval or are generally available reference material.

## **Additional Information:**

Copies of the letter requesting permit revision, draft permit and associated support documents are available at: <a href="http://www.efsec.wa.gov/default.shtm">http://www.efsec.wa.gov/default.shtm</a> or upon request from (360) 664-1345.

The letter requesting permit revision, draft permit and associated support documents are also available for public inspection at the following locations:

| Washington Energy Facility            |  |
|---------------------------------------|--|
| Site Evaluation Council               |  |
| 1300 S. Evergreen Park Drive SW       |  |
| P.O. Box 43172                        |  |
| Olympia, WA 98504-3172                |  |
| 8:00 a.m. to 5:00 p.m. weekdays       |  |
| Phone (360) 664-1345                  |  |
| Richland Public Library               |  |
| 955 Northgate Drive                   |  |
| Richland, WA 99352                    |  |
| In electronic format on the internet: |  |
| The EFSEC web site at                 |  |
| http://www.efsec.wa.gov               |  |

| Notice Prepared: | September 2, 2014 |
|------------------|-------------------|
|                  |                   |
| /s/              |                   |
| Stephen Posner   |                   |
| EFSEC Manager    |                   |