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WASHINGTON STATE
ENERGY FACILITY SITE EVALUATION COUNCIL
Richard Hemstad Building
1300 South Evergreen Park Drive Southwest, Conference Room 206
Olympia, Washington
Wednesday, October 8, 2014
2:02 P.M.

SPECIAL COUNCIL MEETING
Verbatim Transcript of Proceeding

REPORTED BY: SHELBY KAY K. FUKUSHIMA, CCR #2028
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A P P E A R A N C E S

Councilmembers Present:

Bill Lynch, Chair

Liz Green-Taylor, Department of Commerce

Cullen Stephenson, Department of Ecology, via telephone

Joe Stohr, Department of Fish and Wildlife, via telephone

Andrew Hayes, Department of Natural Resources

Dennis Moss, Utilities and Transportation Commission

Assistant Attorney General:

Ann Essko, Assistant Attorney General

Staff in Attendance:

Stephen Posner, EFSEC Manager

Jim LaSpina, Siting Specialist

Tammy Mastro, Commerce Specialist 1

Cassandra Noble, Administrative ~~Assistant~~ Law Judge

Kali Wraspir, Administrative Assistant

Joan Aitken, Office Assistant 3

Guests in Attendance Via Phone:

Shannon Khounnala, Energy Northwest

Philip M. Gent, Washington State Department of Ecology

OLYMPIA, WASHINGTON, OCTOBER 8, 2014

2:02 P.M.

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P R O C E E D I N G S

CHAIR LYNCH: Good afternoon. This is a special council meeting of the Energy Facility Site Evaluation Council. Today is October 8, 2014, and it's just a little bit after two o'clock.

If we could have our Staff person, Tammy Mastro, please call the roll.

MS. MASTRO: Department of Commerce?

MS. GREEN-TAYLOR: Liz Green-Taylor here.

MS. MASTRO: Department of Ecology?

MR. STEPHENSON: Cullen Stephenson on the phone.

MS. MASTRO: Fish and Wildlife?

MR. STOHR: Joe Stohr's on the phone.

MS. MASTRO: Natural Resources?

MR. HAYES: Andy Hayes is here.

MS. MASTRO: Utilities and Transportation Commission?

MR. MOSS: Dennis Moss is here.

MS. MASTRO: Chair, there is a quorum.

CHAIR LYNCH: Thank you.

And is there anybody else on phone, who's listening

1 in on the phone today, who chooses to identify themselves?

2 You're not required to.

3 MS. KHOUNNALA: This is Shannon Khounnala with Energy
4 Northwest. I also have other members of Energy Northwest on the
5 phone with me.

6 CHAIR LYNCH: Thank you, Ms. Khounnala.

7 Anybody else?

8 MR. GENT: Yeah. This is Phil Gent with the
9 Department of Ecology.

10 CHAIR LYNCH: I'm sorry. Could you say your name
11 again and get a little closer to phone?

12 MR. GENT: It's Philip Gent with the Department of
13 Ecology.

14 CHAIR LYNCH: Thank you, Mr. Gent.

15 Anybody else?

16 Okay. I think at this point in time we're ready for
17 Staff to give an overview of proposed Council Order No. 873.
18 And what this is, is an order that would have the Council issue
19 a synthetic minor permit, minor air permit, to the Columbia
20 Generating facility.

21 Mr. LaSpina?

22 MR. LaSPINA: Good afternoon, Chair Lynch, and
23 Councilmembers.

24 The matter before you today concerns Order 873, a
25 permit regulating air emissions from emergency generators and an

1 auxiliary boiler at the Columbia Generating Station.

2 Order 873 replaces existing order 672, and assures
3 consistency with current state and federal laws. Order 873 was
4 written by EFSEC's compliance contractor, Phil Gent, of the
5 Department of Ecology.

6 EFSEC conducted a public comment period from
7 September 5th through October 6, 2014. Staff received one
8 comment which is included in your packets.

9 The order in your packets has some updates from the
10 order sent to you last week via e-mail. The updates are for
11 citations listed in the regulatory authority section of the
12 order.

13 In addition, the appeal language in the final
14 paragraph of the order above the signature block has been
15 updated. These revisions did not affect any of the technical
16 elements of the order.

17 EFSEC Staff recommends approval of Order 873 to
18 assure consistency with current state and federal air quality
19 regulations.

20 And I would be happy to answer any questions you may
21 have, and also the permit writer has called in from Richland.

22 CHAIR LYNCH: Any questions by Councilmembers at this
23 time?

24 MR. MOSS: I just had one clarifying question. I was
25 noticing that there's a change. It's, I suppose, fairly basic

1 to go from a volumetric measure to a temporal measure in terms
2 of monitoring activities. Yet the fourth matter addressed in
3 the order maintains a volumetric criterion, and I was just
4 wondering how that's reconciled.

5 MR. LaSPINA: Phil, if you could address
6 Councilmember Moss's question, I would appreciate it.

7 MR. GENT: Councilmember Moss, the hourly measurement
8 that's placed on the generators as they are the primary
9 (inaudible) --

10 CHAIR LYNCH: Excuse me, Mr. Gent. Excuse me. Could
11 you stop for a second?

12 Are you on a speakerphone?

13 MR. GENT: No, I'm not.

14 CHAIR LYNCH: Okay. Well, we're having real trouble
15 understanding you, and I wonder if you could at least speak a
16 little slower because you're coming across a bit garbled.

17 MR. GENT: Is this better?

18 CHAIR LYNCH: Yes, much better.

19 MR. GENT: So the generators are the primary emitters
20 of pollutants. They also have hour meters associated with them
21 that can record the hours that are generated on them, so we
22 shifted them to hour meters as they are more of an easier
23 enforcement tool. Any inspector can walk out, look at the hour
24 meter, compare it to the last reading, and make sure that it is
25 still valid.

1 For the boiler, the boiler does not have the hour
2 meter. Additionally, it runs at different levels of fuel input.
3 And as the fuel input changes, the emissions rate changes, so
4 it's fairly constant with the amount of fuel burned in the
5 boiler for the pollutants emitted, but it is not constant with
6 the hours of operation for the pollutants emitted. So we left
7 the boilers volumetric. We shifted the generators to hourly.

8 MR. MOSS: That helps. Thank you very much.

9 CHAIR LYNCH: And what this particular permit is for
10 is to replace generators; is that correct?

11 MR. LaSPINA: Actually, in response to the Fukushima
12 disaster, the Nuclear Regulatory Commission updated their
13 emergency preparedness requirements and as a result of that,
14 Energy Northwest bought an additional emergency generator. So
15 Energy Northwest requested that the order be updated to reflect
16 the additional generator, and then the permit writer discovered
17 that the federal regulations had changed and so the order needed
18 to be updated anyway.

19 Is that about right, Phil?

20 MR. GENT: The original permit had an annual
21 reporting requirement for the fuel consumption and volume, and
22 the guidance from the EPA states that you need to have that as a
23 monthly -- rolling monthly basis or less frequent -- you know,
24 biweekly, weekly, daily. But monthly is the longest that their
25 guidance permits, so we need to shift an annual in the old order

1 to the rolling monthly. Once we did that and changed it to the
2 hours, we also had the Fukushima update for the generator that
3 was brought in. And when we brought that one in, we adjusted a
4 little bit of the hour consumption per generators.

5 So for the most part, what we were looking at was an
6 update to incorporate guidance from EPA, and, additionally, we
7 introduced the new generator for the Fukushima-styled safety
8 updates.

9 CHAIR LYNCH: And it's correct, Mr. Gent, that one of
10 the things that this order does is it reduces the annual usage
11 of diesel fuel for the auxiliary boiler; is that right?

12 MR. GENT: That is correct. The permittee, Energy
13 Northwest, wanted to ensure that their generator had as much
14 time as possible in consideration of their original permit.
15 Because we added new items and went to an hourly meter, that
16 shifted a reduction in the volume of fuel to go to the boiler.

17 I did take this permit before it went out for public
18 comment and allowed Energy Northwest to read and review it to
19 make sure that it would not impact them in their operations and
20 their mission of, you know, creating power for the Pacific
21 Northwest.

22 CHAIR LYNCH: Any other Council questions for
23 Mr. LaSpina or Mr. Gent?

24 MR. HAYES: Chair, if I might ask one?

25 CHAIR LYNCH: Yes, please, Mr. Hayes.

1 MR. HAYES: Mr. LaSpina, am I to understand that
2 there's only one public comment that was offered during the
3 comment period?

4 MR. LaSPINA: Yes, sir.

5 MR. HAYES: Thank you.

6 CHAIR LYNCH: And the comment, as you see in front of
7 you, is just essentially a protest letter against the operation
8 of nuclear facilities.

9 Now, Ms. Khounnala, did you want to add anything or
10 have any of your people with you today add anything?

11 MS. KHOUNNALA: Chair, I don't believe so. I think
12 we've all agreed with what's been presented here today and look
13 forward the Council's vote. Thank you.

14 CHAIR LYNCH: If there's no more questions or
15 discussion and you've all had a chance to look at this Council
16 order, I'll just ask: Is there any discussion on this Council
17 order?

18 There doesn't appear to be.

19 I will entertain a motion for its adoption.

20 MR. MOSS: Chair Lynch, I would move that the Council
21 approve Order 873, Columbia Generating Station order to operate
22 multiple diesel-fired combustion units to provide steam and
23 emergency power as discussed today and that the Council direct
24 appropriate signatures be affixed to the order and it be
25 entered.

1 CHAIR LYNCH: Councilmember Moss has moved for the
2 approval of Council Order No. 873.

3 Do we have a second?

4 MS. GREEN-TAYLOR: I'll second that.

5 CHAIR LYNCH: Ms. Liz Green-Taylor has seconded it.
6 All those in favor say "aye."

7 MULTIPLE SPEAKERS: Aye.

8 CHAIR LYNCH: Opposed?

9 Motion carries.

10 And with that, we have approved Council Order
11 No. 873.

12 And seeing no further business in front of the
13 Council today, we are adjourned. Thank you.

14 (Whereupon, the meeting was adjourned at 2:13 p.m.)

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C E R T I F I C A T E

STATE OF WASHINGTON)
) ss
COUNTY OF KING)

I, SHELBY KAY K. FUKUSHIMA, a Certified Shorthand Reporter
and Notary Public in and for the State of Washington, do hereby
certify that the foregoing transcript is true and accurate to
the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal
this 15th day of October, 2014.

SHELBY KAY K. FUKUSHIMA, CCR

My commission expires:
June 29, 2017

From: Robert von Tobel <rvon_tobel@hotmail.com>
Sent: Friday, September 05, 2014 9:34 PM
To: EFSEC (UTC)
Subject: RE: Columbia Generating Station Public Comment Opportunity for Draft Air Quality Permit – Order 873

Follow Up Flag: Follow up
Flag Status: Flagged

To: EFSC Manager,

From: Robert von Tobel

2038-139th Pl S E

Bellevue, WA 98005

Re: COLUMBIA GENERATING STATION

ISSUANCE OF ORDER 873 [SYNTHETIC MINOR (AIR) PERMIT]

Dear Sir,

I oppose issuing a permit to allow any change to the nuclear power reactor at Richland, WA.

I firmly believe that until nuclear power plant waste can be disposed of safely we should immediately shut down all nuclear power plants and not permit construction of any new nuclear power plant.

The threat they pose to all life on the planet is not tolerable under any rationale.

Robert von Tobel

From: EFSEC@utc.wa.gov

Subject: Columbia Generating Station Public Comment Opportunity for Draft Air Quality Permit – Order 873

Date: Fri, 5 Sep 2014 15:10:40 +0000

Good Morning:

You are receiving this correspondence because you have indicated that you are an interested party regarding the Columbia Generation Station.

The attached public notice is concerning an opportunity for public comment regarding the Draft Air Quality Permit – Order 873 for the Columbia Generating Station.

Please contact me if you have any issues opening the attachment in this email.

Thank you,

~Joan Aitken

Washington Energy Facility Site Evaluation Council

www.efsec.wa.gov

STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
P. O. BOX 43172
OLYMPIA, WASHINGTON 98504-3172

In the Matter of:

COLUMBIA GENERATING STATION

COUNCIL ORDER No. 873

**Order on Request to Operate Multiple
Diesel-fired Combustion Units to Provide
Steam and Emergency Power.**

Regulatory Authority:

Pursuant to the Energy Facility Site Evaluation Council (EFSEC) Revised Code of Washington (RCW) 70.94.442, Chapter 80.50 RCW, Washington Administrative Code (WAC) 173-400-091, WAC 173-401-300, and Chapter 463-78 WAC, EFSEC now finds the following:

Findings:

1. Energy Northwest (EN) is the operator of the Columbia Generating Station (CGS), an electric generating plant located on the Hanford Site in Benton County, Washington.
2. CGS has multiple diesel-fired combustion units to provide steam and emergency power.
3. The combustion units have the potential to emit nitrogen oxides and carbon monoxide pollutants that exceed the threshold given in WAC 173-401-300, Applicability, and therefore, would be required to obtain an Operating Permit in accordance with WAC 173-401, Operating Permit Regulation.
4. EN has requested EFSEC limit the combustion units' potential to emit nitrogen oxides and carbon monoxide, pollutants to levels agreed to by the EN and EFSEC.

Order:

THEREFORE, IT IS ORDERED by EFSEC in relation to the above that EN's CGS combustion units be operated subject to the conditions described below. Order 873 replaces Order 672 issued January 8, 1996 and updates the air monitoring requirements for the equipment listed in Sections 2.1 and 2.4 of this Order to reflect current regulatory requirements.

*Council Order No. 873, Columbia Generating Station,
Order to Operate Multiple Diesel-fired Combustion
Units to Provide Steam and Emergency Power.*

1.0 GENERAL APPROVAL CONDITIONS

1.1 Effective date

The effective date of this authorization shall be that as signed in Section 3.0. All references to procedures or test methods shall be those in effect as of the effective date of this ORDER.

2.0 OPERATIONAL LIMITATIONS AND ADDITIONAL REQUIREMENTS

- 2.1 That the run time for each of the emergency power generators (DG1, DG2, DG3, and DG5) shall not exceed the following hours on an annual basis.

Emergency Power Generator	12-month Rolling Sum Limit (Hours)
Diesel Generator 1	484 Hours
Diesel Generator 2	484 Hours
Diesel Generator 3	484 Hours
Diesel Generator 5	100 Hours

- 2.2 That the emergency power generator run times shall be reported on a 12-month rolling sum basis using run time hour meters.
- 2.3 The total emergency power generator run times on a 12-month rolling basis shall be reported by the end of September every year. The reported values will include values for each month as well as the calculation of the 12-month rolling total for each month.
- 2.4 That the annual usage of diesel fuel for the auxiliary boiler shall not exceed 730,000 gallons.
- 2.5 That the auxiliary boiler fuel consumption shall be reported on a 12-month rolling sum basis.
- 2.6 The total auxiliary boiler volumetric usage on a 12-month rolling basis shall be reported by the end of September every year. The reported values will include values for each month as well as the calculation of the 12-month rolling total for each month.
- 2.7 The above cap is based upon calculative methods. A 90 ton per year emissions target was used for the cap to allow for a 10 ton per year buffer between the calculated emissions and the operating permit emissions threshold of 100 tons per year. Adjustments to the cap that will exceed the 90 ton per year emissions target may be made by issuing another separate Order in accordance with WAC 173-400-091. Issuing another separate Order in accordance with WAC 173-400-091 may be done if more refined calculation or testing is conducted or justification is made that 100 tons per year would not be exceeded. A Notice of Construction will not be required for this instance if this is the sole reason for requesting a change to the terms of the Order.

- 2.8 If EN determines that it no longer wants to limit emissions below the 100 tons per year threshold, it must submit an operating permit application in accordance with WAC 173-401. Until an operating permit is issued, EN will continue to be bound by this Order.

3.0 APPROVAL ORDER AND RESTRICTIONS

Any application form, report, or compliance certification submitted pursuant to this Order shall contain certification by a responsible official of truth, accuracy, and completeness.

Nothing in this Order alters the facility's obligation to comply with other laws, including air laws and regulations, except that EN's application for, receipt of, and compliance with this order exempts EN from the requirements to obtain an Operating Permit. Any violation of such rules and regulations or of the terms of this approval, including but not limited to exceedances of emissions limits demonstrated by source testing or emissions calculations, shall be subject to the sanctions provided in Chapter 80.50 RCW.

The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, shall not be affected thereby.

This Order is subject to judicial review pursuant to the Administrative Procedure Act, Chapter 34.05 RCW. The Administrative Procedure Act can be found on-line at:
<http://apps.leg.wa.gov/rcw/default.aspx?cite=34.05>.

DATED at Olympia, Washington this ____ day of _____, ____.

FOR THE WASHINGTON STATE ENERGY FACILITY SITE EVALUATION COUNCIL.

William Lynch
EFSEC Chairman

ATTEST:

Stephen Posner
EFSEC Manager

Philip M. Gent, P.E.
Washington State Department of Ecology

*Council Order No. 873, Columbia Generating Station,
Order to Operate Multiple Diesel-fired Combustion
Units to Provide Steam and Emergency Power.*



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 ([location map](#)), 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

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

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

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 <http://www.efsec.wa.gov/default.shtm>. 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: <http://www.efsec.wa.gov/default.shtm> 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