

**USDOE – Hanford Site
Richland WA
License: FF-01
296-A-40
200E P-296AP-001
(EU 204; NOC 1012)**

Licensing File

Table of Contents

- 1) Licensing Checklist
- 2) Application –Report of Closure (IM# 9,497)
- 3) Closeout Approval Letter

Item #

1

SDB

Is it necessary to send the 20-Day City Notification? If yes, prepare ASAP and forward to HP3 for review (follow same process as above for letter issuance [HP3 -> HSC -> AA3]). HSC will update RAES Tracking/RDIT upon transmittal and will notify you of 20-Day Comment Due Date, below, upon returning the file to you).

- USDOE-RL Hanford Site is exempt from this requirement.
- If RAEL is part of a Materials or Waste license, the responsibility falls on them to notify the city.
- We issue these notifications for *new facility licenses or renewals only*; we do not issue them for modifications or revisions to an existing license.

20-Day Comment Due Date: N/A

BJC

Within 40 days of completeness determined, complete thorough review of application and draft license. *statement letter* Any EU specific conditions must have justification/basis documented in the 'explanation' section of the database. Discuss any concerns/issues with HP3 during this 40 day period. Also, have HSC do an informal review of the license for consistency before sending to the licensee.

HSC Informal License Review

N/A - no license to review

Send informal draft license to licensee for review, allowing them a week to 10 days to get comments back to you. *Be sure to include a 'due date'.*

N/A - nothing for licensee to review

Upon receipt of response from licensee, resolve any comments/issues/concerns right away and finalize the draft license and transmittal letter (28-day Draft). **At least 3-5 days** before 28-Day Draft Due Date, send license file, draft transmittal letter, and draft license to HP3 for final review.

or adverse action against a license (WAC 246-10-107(2)), not a matter to deny, suspend, revoke or modify a license.

HP3 approves and forwards license file and draft letter to HSC for review. HSC reviews and forwards to AA3 for finalization (HSC will hold file until licensee receives 28-day draft). *246-10-23 (i)(ii)*

N/A - see above

Upon licensee receipt of 28-day draft, HSC will update RAES Tracking/RDIT, verify database concurrence, and return license file to HP2 with due date for licensee response or final issuance of license.

N/A - see above

Final Due Date: _____

BJC

Once licensee has accepted, or the 28 days has expired (**no more than 2-3 days before**), obtain an approval number (AIR#) from AA3 and prepare final license and "Final Approval" letter. Send license file (*be sure table of contents provides for final letter/license*), final transmittal letter, and final license to HP3 for final review.

La

HP3 approves and forwards to HSC for review. HSC forwards to AA3 for finalization.

HSC finalizes:

SDB

Add final letter(s)

Update RAES Tracking/RDIT

Verify database concurrence - *obsoleted both EU & NOC*

SDB

Update Licensee List

Add final file to database 'inbox' to be entered/scanned

License: 296-A-40 OPERATION

EU(s): 204

NOC(s): 1012

LICENSING CHECKLIST

(Rev. 4)

Please initial, as appropriate, rather than placing a check mark.

SDB RAES date received 3/22/17 and IM# assigned 9,497

Licensing Action:

- Renewal (WAC 246-247-060(9))
- Report of Closure (WAC 246-247-080(6))
- Revision (refer to 'modification' - without Appendix A requirements)
- Modification (WAC 246-247-060(1))
- New Facility (WAC 246-247-060(1))
- Replacement in Kind (WAC 246-247-030(22))

SDB Entered into RAES Tracking/RDIT 17-52 . Completeness Review due N/A

SDB To HP3 (responsible for facility) for assignment: RANDY UTLEY

PR To assigned HP2: Ben *let me know please!*

B3C Add draft Table of Contents and separator pages to file.

Conduct completeness review to determine if all necessary information is provided to allow us to make a decision (use ~~"Completeness Review Checklist" if Appendix A required~~) and draft ~~"Completeness Notification" letter~~ **within 20 days** of RAES date received. Discuss any concerns/issues with HP3 during this 20 day period. *elf complete - skip to page 2!*

N/A - Checklist does not apply

Place "Completeness Review Checklist" in license file and prepare draft "Completeness Determination" letter. Letter *must go out within 30 days* of RAES date received.

- If application is incomplete, you may need to repeat this (and prior) step(s).
- If application complete, assign NOC ID and EU ID, as appropriate. **Do NOT** obsolete 'old' NOC, EU, etc. before the new final, approved, license is issued (you may have to exclude the old NOC from AOP for printing purposes).

N/A - checklist does not apply

Forward license file and draft "Completeness Determination" letter to HP3 for review. *(If 28-day draft has already been reviewed by licensee and HP3 and is ready to go out at the 30 day mark, you may combine completeness and 28-day draft.)* *not*

N/A - checklist does not apply, no completeness determination applicable

HP3 - work with HP2 to resolve any comments then forward license file and draft "Completeness Determination" letter to HSC for review.

N/A - completeness determination not applicable

HSC - work with HP3 to resolve any comments then forward draft "Completeness Determination" letter to AA3 for finalization (HSC will update RAES Tracking/RDIT upon transmittal and will note the 28-Day Draft Due Date, below, upon returning file to you). You now have **60 days** to issue the official 28-Day Draft Approval letter.

28-Day Draft Due Date: _____ (See next step, immediately.)

N/A completeness determination not applicable

Item #

2



OFFICE OF RIVER PROTECTION
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

IM# 9,497

MAR 20 2017

17-ECD-0016

Mr. John Martell, Manager
Radioactive Air Emissions Section
Washington State Department of Health
309 Bradley Blvd., Suite 201
Richland, Washington 99352
(Hanford Mailstop: B1-42)

RECEIVED
MAR 22 2017
WA Dept of Health
Radioactive Air Emissions Section

Mr. Martell:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITS REPORTS OF CLOSURE FOR EMISSION UNITS 204 AND 1391 CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

The U.S. Department of Energy, Office of River Protection hereby submits the License / As Low As Reasonably Achievable Control Technology Revision Request Reports of Closure for emission unit 204, 296-A-40 Operation (Attachment 1), and emission unit 1391, SX Farm Pore Water Extraction Test Project (Attachment 2) contained in Hanford Site Air Operating Permit, Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01.

The Notification of Change Not Requiring Permit Revision form (Attachment 3) is needed by the Washington State Department of Ecology to process an air operating permit revision.

If you have any questions, please contact Dennis W. Bowser, Environmental Compliance Division, (509) 373-2566.

Kevin W. Smith
Manager

ECD:DWB

Attachments:

1. 296-A-40 Operation
2. SX Farm Pore Water Extraction Test Project
3. Notification of Change Not Requiring Permit Revision

cc: See page 2

Mr. John Martell
17-ECD-0016

-2-

MAR 20 2017

cc w/attachs:

P.M. Gent, Ecology
J. McAuly, EPA (Region 10, Seattle)
R.A. Kaldor, MSA
E.T. Faust, RL
BNI Correspondence
Environmental Portal, LMSI
WRPS Correspondence

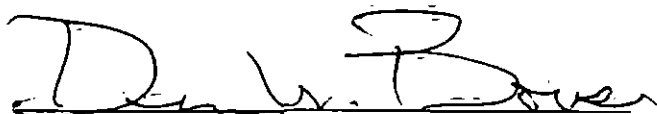
cc w/o attachs:

B.G. Erlandson, BNI
J. Cox, CTUIR
R.S. Skeen, CTUIR
S.L. Dahl, Ecology
G. Bohnee, NPT
K. Niles, Oregon Energy
J.W. Schmidt, WDOH
R.J. Utley, WDOH
J.A. Joyner, WRPS
R. Jim, YN
D. Rowland, YN

Attachment 1
17-ECD-0016
(7 Pages Excluding Cover Sheet)

License / ALARACT Revision Request

296-A-40 Operation



Dennis W. Bowser

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated potential to emit (PTE) is considered a modification and requires an Appendix A Application per Washington Administrative Code (WAC) 246-247.

Submittal Date: 3/20/17

License Revision
WDOH Condition Number: _____

ALARACT Revision
New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: 296-A-40 Operation

Current WDOH NOC Number(s): 1012

WDOH EU ID Number(s): 204

Current WDOH Approval Letter Number(s): AIR 16-201

DESCRIPTION OF CHANGE

Number of Attachments: 1

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

Report of Closure for Emission Unit 204

Refer to the Attachment for photographs of the exhauster location after removal of the exhauster.

Summary/Introduction

In accordance with Washington Administrative Code 246-247-080(6), this report of closure is being submitted to the State of Washington Department of Health (WDOH).

The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future plans
- Emissions control and monitoring

1. Date of closure

The closure date is the submittal date of this closure report.

2. Remaining material

There is no change in remaining material as a result of this report of closure.

3. Assessment of potential continued emissions

AP Tank Farm primary exhauster 296-A-40 has been removed. Emissions will be routed through replacement exhausters 296-A-48 (emission unit 1328) and 296-A-49 (emission unit 1329).

4. Future plans

Ventilation in the AP Tank Farm will be will be conducted with replacement exhausters 296-A-48 and 296-A-49.

5. Emissions control and monitoring

Emissions control and monitoring for 296-A-40 are no longer required. Emissions control and monitoring will be conducted for replacement exhausters 296-A-48 and 296-A-49.


Based on this report of closure, it is requested that the FF-01 license be revised such that emission unit 204 is removed.

SIGNATURE

Licensee Name: U.S. Department of Energy, Office of River Protection

Licensee Title: Permittee, Hanford Air Operating Permit and FF-01

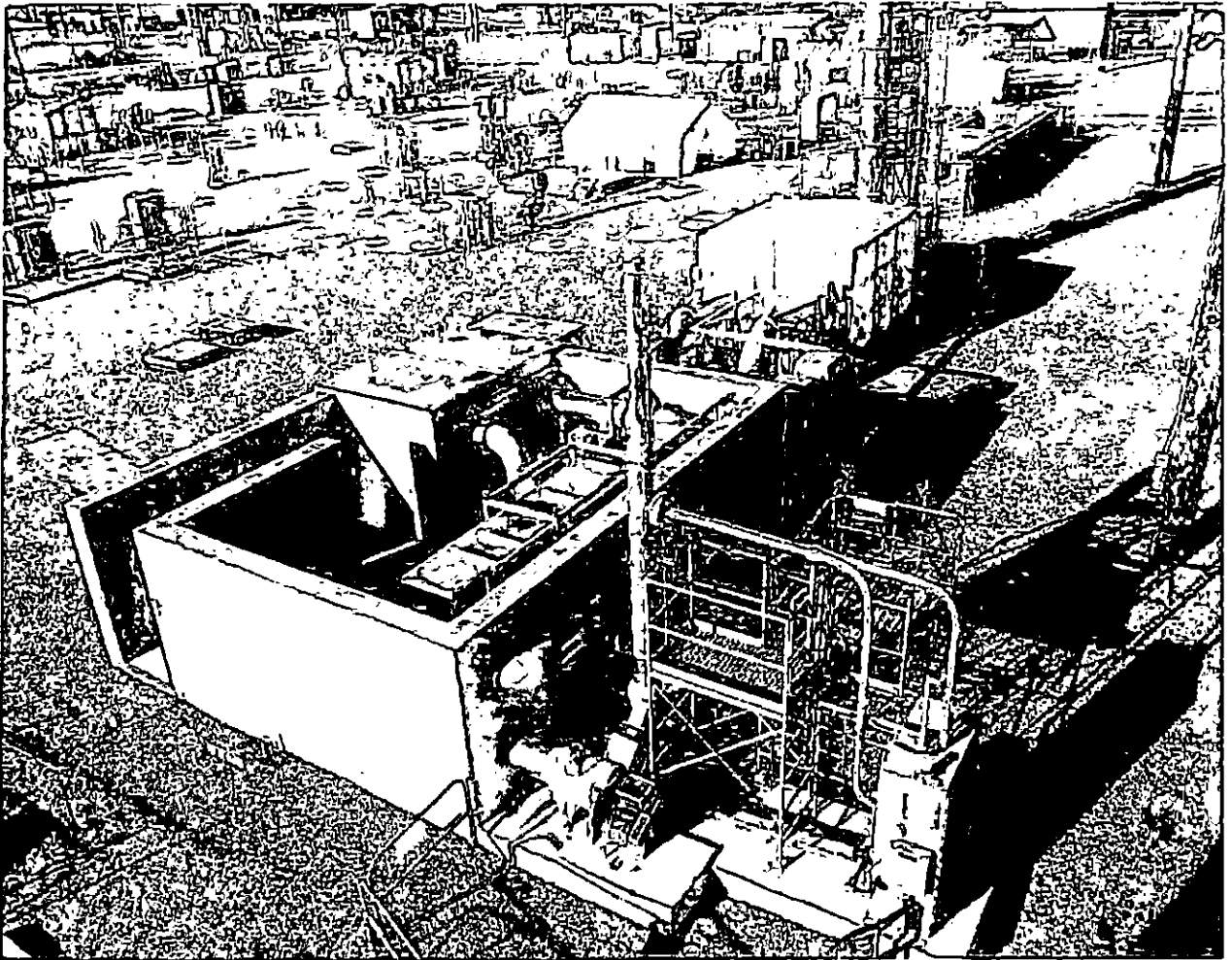
Licensee

Signature: 

Date: 3/20/17

Attachment

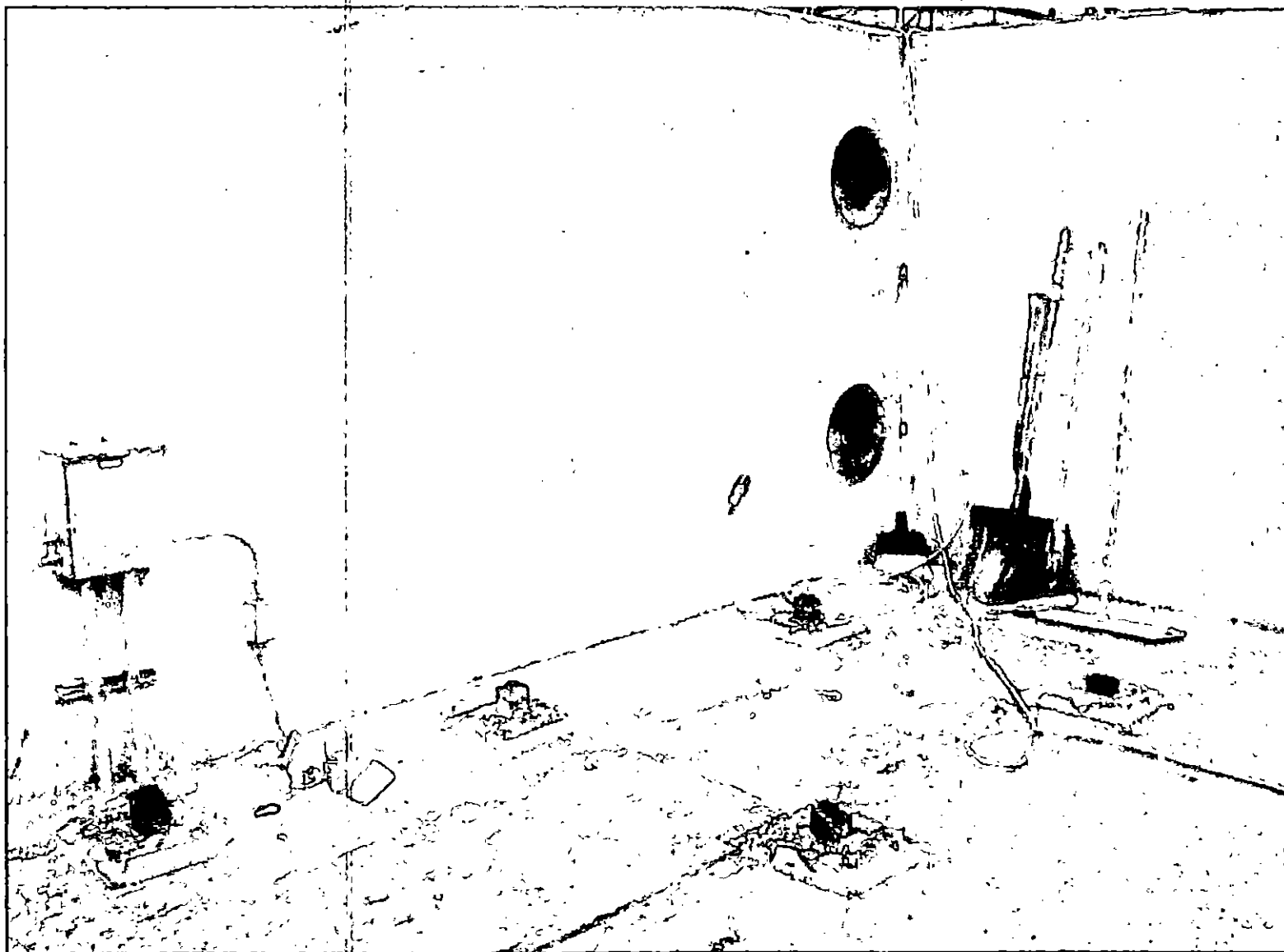
296-A-40 Demolition Scope



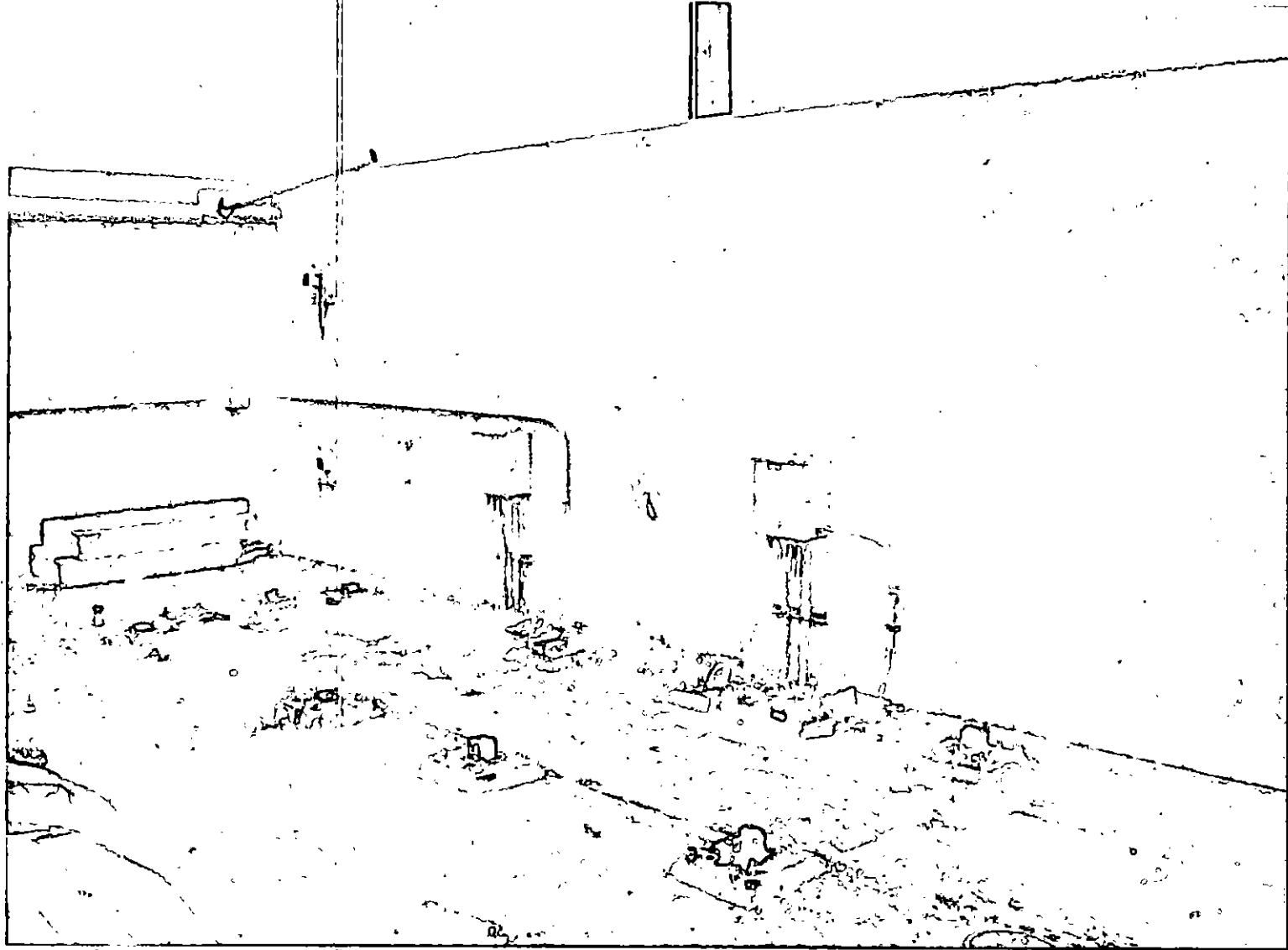
296-A-40 Exhauster Pad Location with Stack Removed



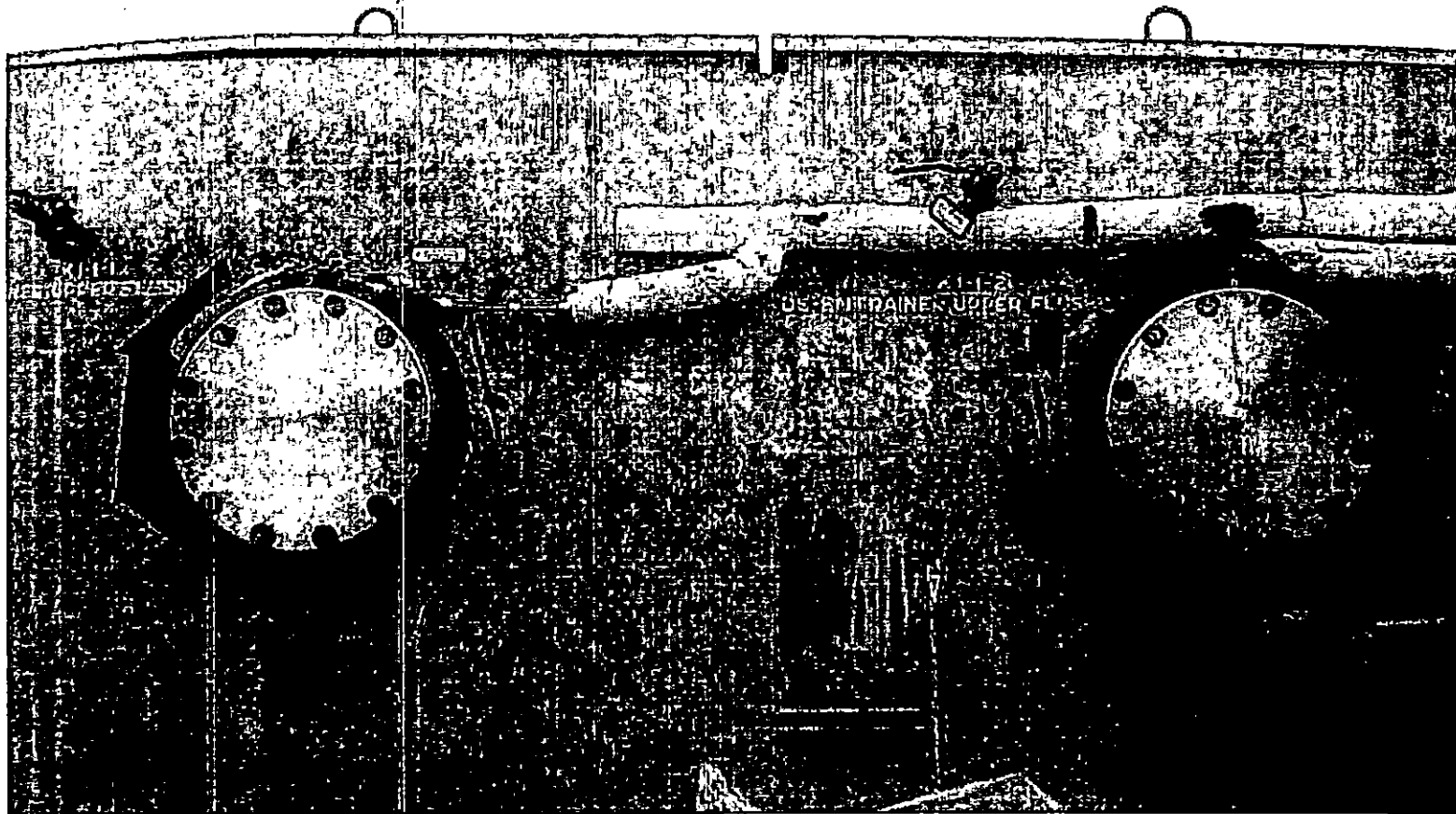
296-A-40 Exhaust Ports to Stack from inside Concrete Wall with Filter Housing Removed



296-A-40 Condensate Drain Lines with Filter Housing Removed

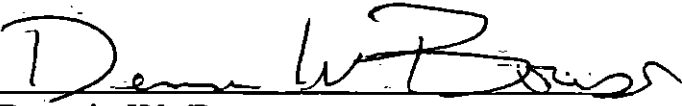


296-A-40 Exhaust Ports from De-Entrainers to Filter Housing Blanked Off



Attachment 2
17-ECD-0016
(2 Pages Excluding Cover Sheet)

License / ALARACT Revision Request
SX Farm Pore Water Extraction Test Project


Dennis W. Bowser

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated potential to emit (PTE) is considered a modification and requires an Appendix A Application per Washington Administrative Code (WAC) 246-247.

Submittal Date: 3/20/17

License Revision
WDOH Condition Number: _____

ALARACT Revision
New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: SX Farm Pore Water Extraction Test Project
Current WDOH NOC Number(s): 904
WDOH EU ID Number(s): 1391
Current WDOH Approval Letter Number(s): AIR 13-1001

DESCRIPTION OF CHANGE

Number of Attachments: 0

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

Report of Closure for Emission Unit 1391

Summary/Introduction

In accordance with Washington Administrative Code 246-247-080(6), this report of closure is being submitted to the State of Washington Department of Health (WDOH).

The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future plans
- Emissions control and monitoring

1. Date of closure

The closure date is the submittal date of this closure report.

2. Remaining material

There is no change in remaining material as a result of this closure.

3. Assessment of potential continued emissions

There will be no continued emissions. The pore water extraction test project has been completed.

4. Future plans

There are no plans to continue the pore water extraction test project. The project has been completed.

5. Emissions control and monitoring

Emissions control and monitoring for the project are no longer required.

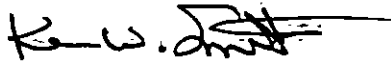
Based on this report of closure, it is requested that the FF-01 license be revised such that emission unit 1391 is removed.

SIGNATURE

Licensee Name: U.S. Department of Energy, Office of River Protection

Licensee Title: Permittee, Hanford Air Operating Permit and FF-01

Licensee

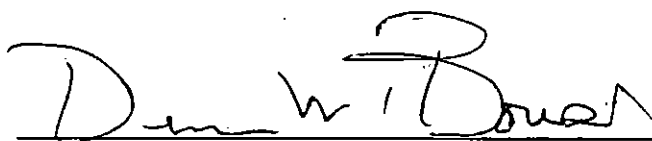
Signature: 

Date: 3/26/17

Attachment 3
17-ECD-0016
(1 Page Excluding Cover Sheet)

Notification of Change Not Requiring Permit Revision

Section 502(2)(10) Change


Dennis W. Bowser
Dennis W. Bowser

NOTIFICATION OF CHANGE NOT REQUIRING PERMIT REVISION

Section 502(2)(10) Change*

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as notice of a change not requiring permit revision described as follows.

This change is allowed pursuant to WAC 173-401-722(1), WAC 173-401-722(2) and WAC 173-401-722(5):

1. Change is not a Title I modification.
2. Change does not result in emissions that exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions.
3. Change does not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit;
4. Notification is proved to Ecology, WDOH, and EPA at least 7 days before making the change, and
5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
6. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Permit Number: 00-05-006

Provide the following information pursuant to WAC-173-401-722(2)(a):

Description of the change:
Report of closure for Emission Unit 204, 296-A-40 Operation. Report of closure for Emission Unit 1391, SX Farm Pore Water Extraction Test Project.
Date of change:
The closure date is the submittal date of this closure report.
Describe the emissions resulting from the change:
No change in emissions will occur.
List any permit term or condition that will no longer be applicable as a result of the change:
Emission Unit 204, NOC_ID 1012. Emission Unit 1391, NOC_ID 904.

* WAC 173-401-200(30) states that "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

Item #

3



LB# 5017

STATE OF WASHINGTON
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION
309 Bradley Blvd., Suite 201 • Richland, Washington 99352
TDD Relay Service: 1-800-833-6388

AIR 17-403
EUs 204 & 1391

April 11, 2017

Mr. Kevin W. Smith, Manager
United States Department of Energy
Office of River Protection
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Report of Closure for Emission Units (EUs) 204 and 1391

Reference: 1. Letter (IM# 9,497), Kevin W. Smith (DOE-ORP) to John Martell (WDOH), "U.S. Department of Energy, Office of River Protection Submits Reports of Closure for Emission Units 204 and 1391 Contained in the Hanford Site Air Operating Permit, Permit Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01" dated 03/20/2017.

Mr. Smith:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your request to close the following EUs is hereby approved.


**296-A-40 Operation
(EU 204, NOC 1012)**

**SX Farm Pore Water Extraction Test Project
(EU 1391, NOC 904)**

During the next update of the Hanford Site FF-01 Radioactive Emissions License, these EUs will be removed.

If you have any questions regarding this approval, please contact Ben Conroy at benjamin.conroy@doh.wa.gov or, by phone, at (509) 946-0790.

Sincerely


John Martell, Manager
Radioactive Air Emissions Section

cc: (see next page)

Public Health - Always Working for a Safer and Healthier Washington



Mr. Kevin W. Smith
April 11, 2017
Page 2 of 2

AIR 17-403

cc: Ruth Allen, WRPS
Matthew Barnett, PNNL
Lilyann Baüder, Ecology
Shawna Berven, WDOH
Lucinda Borneman, WRPS
Lee Bostic, BNI
Dennis Bowser, USDOE-ORP
Frank Carleo, CHPRC
Cliff Clark, USDOE-RL
Ben Conroy, WDOH
Jack Donnelly, WRPS
Dennis Faulk, EPA
Eric Faust, USDOE-RL
Gary Fritz, MSA
Philip Gent, Ecology
Robert Haggard, BNI
Daniel Heuston, Ecology
Jessica Joyner, WRPS
Reed Kaldor, MSA
Paul Karschnia, CHPRC
Jim McAuley, EPA
Bryan Trimberger, USDOE-ORP
Randy Utley, WDOH
Jeff Voogd, WRPS
Environmental Portal
RAES Tracking: Lines 17-52 and 17-53; EU 204 & 1391; NOC 904 & 1012; Resp. to
IM# 9,497