USDOE – Hanford Site
Tru Decon Trailer
Richland WA
License: FF-01
(EU 1243; NOC 1018)

Licensing File

Table of Contents

1

PART OF DATABASE ONE-TO-ONE UPDATE

LICENSING CHECKLIST

(Rev. 2)

Please initial boxes, as appropriate, rather than placing a check mark in the box

TPF ☑ RAES date received 06/30/16 and IM# assigned LB 4751

☑ Entered into RAES Tracking/RDTT 16-126. Completeness Review due N/A.

☑ To HP3 (responsible for facility) for assignment: JWS

☑ To assigned HP2: TPF

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

N/A Conduct completeness review using "Completeness Review Checklist" and draft "Completeness Notification" letter **within 20 days** of RAES date received. Discuss any concerns/issues with HP3 during this 20 day period.

N/A 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 old from AOP for printing purposes).

N/A 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.)*

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

☑ HSC – work with HP3 to resolve any comments then forward draft "Completeness Determination" letter to AA3 for finalization (HSC will update RAES Tracking/RDTT 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 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/RDTT 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 licenses or renewals only;* we do not issue them for modifications.

20-Day Comment Due Date:_____

(see page 2)

☐ **Within 40 days** N/A of completeness determined, complete thorough review of application and draft license. **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

☐ 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'.*

☐ 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.

☐ 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).

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

Final Due Date: 9/12/16

☐ 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.

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

HSC finalizes:

☐ Add final letter(s)

☐ Update RAES Tracking/RDTT

☐ Verify database concurrence

☐ Update Licensee List

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

2

Frazier, Thomas (DOH)

From: Faust, Eric T <Eric.Faust@rl.doe.gov>
Sent: Wednesday, July 20, 2016 7:30 AM
To: Frazier, Thomas (DOH)
Cc: Karschnia, Paul T; Schmidt, John W (DOH)
Subject: RE: Review of Updated Licenses for Trench 31 and 34: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal) (NOC 834) and Decontamination Trailer at the Transuranic Waste Retrieval Project (NOC 851)

Tom,

Tad and I reviewed the licenses that you sent; we had no comments.

Thanks for providing us the opportunity,

Eric
509-376-9607

From: Frazier, Thomas (DOH) [mailto:Thomas.Frazier@DOH.WA.GOV]
Sent: Friday, July 08, 2016 1:17 PM
To: Faust, Eric T <Eric.Faust@rl.doe.gov>
Cc: Karschnia, Paul T <Paul_T_Karschnia@rl.gov>; Schmidt, John <john.schmidt@doh.wa.gov>
Subject: Review of Updated Licenses for Trench 31 and 34: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal) (NOC 834) and Decontamination Trailer at the Transuranic Waste Retrieval Project (NOC 851)
Importance: High

Eric here are the revised Licenses for

NOC 834 Trench 31 and 34: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal):

NOW - Trench 31: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal) (NOC 1020) (EU 472) and Trench 34: Leachate Collection and Storage Tank (LLBG Mixed Waste Disposal) (NOC 1021)(EU 473)

NOC 851 Decontamination Trailer at the Transuranic Waste Retrieval Project:

NOW - Decontamination Trailer at the Transuranic Waste Retrieval Project (NOC 1018) (1243) and Decontamination Trailer at the Transuranic Waste Retrieval Project (NOC 1019) (EU 1244)

Take a look at them and provide any comments or corrections that you may have by Wednesday July 20; since I will be out of the office until then.

Thanks,

Tom

3

Emission Unit ID: 1243

200 200 W-TRUDECON-001

Decon Trailer TRU Waste Retrieval (Intermit. Op.)

This is a MINOR, PASSIVELY ventilated emission unit.

Miscellaneous Support Facilities

Abatement Technology

BARCT WAC 246-247-040(3), 040(4)

state only enforceable: WAC 246-247-010(4), 040(5), 060(5)

Zone or Area	Abatement Technology	Required # of Units	Additional Description

Monitoring Requirements

state enforceable: WAC 246-247-040(5), 060(5), and federally enforceable: 40 CFR 61 subpart H

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-075[2]	40 CFR 61, Appendix B, Method 114	Each radionuclide that could contribute greater than 10 percent of the potential-to-emit TEDE	Per the sitewide ambient monitoring program samples will be collected from the existing near-facility monitoring stations

Sampling Requirements Per the sitewide ambient monitoring program

Additional Requirements

See Section 5 of the general conditions in this license for additional information.

Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status

This Emission Unit has 1 active Notice(s) of Construction.

Project Title	Approval #	Date Approved	NOC_ID
Decontamination Trailer (Intermit Op.) at the Transuranic Waste Retrieval Project (Replaces NOC 851)		Not Approved	1018

Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)

1) The total abated emission limit for this Notice of Construction is limited to 1.55E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).

2) This approval applies only to those activities described below. No additional activities or variations on the approved activities that constitute a "modification" to the emission unit, as defined in WAC 246-247-030(16), may be conducted.

All work will be performed in accordance with approved radiological control methods and as low as reasonably achievable (ALARA) program requirements. These requirements will be carried out through radiological control procedures.

The general physical processes associated with decontamination activities in the decontamination trailer will consist of the following:

- On identification of the need for additional decontamination of personnel, affected individuals will be escorted to the decontamination trailer.

- As appropriate, contaminated clothing, coverings, and/or articles will be removed, packaged, and dispositioned in accordance with applicable facility waste handling procedures.

- Personnel decontamination processes might include various methods or a combination of

cleaning agents (e.g., soap and water; pre-moistened towelettes, shaving cream-type foam decontamination agents for facial areas; removal of hair; and abrasive soaps for toughened skin surfaces [e.g., hands and feet]).

- Spent decontamination solutions will be transferred from the holding tanks directly to a mobile disposal unit or containerized (e.g., packaged in absorbents in drums or placed in drums or carboys) and transported to existing facilities on the Hanford Site for disposal.

Periodic maintenance inspections of the decontamination trailer will be performed without use of containment or portable exhausters.

3) The PTE for this project as determined under WAC 246-247-030(21)(a-e) [as specified in the application] is 1.55E-05 mrem/year. Approved are the associated potential release rates (Curies/year) of:

Am - 241	8.37E-04	Solid	WAC 246-247-030(21)(a)
Alpha release rate based on Am-241. Any radionuclide might be present Am-241 is representative of the alpha-emitting radionuclides present.			
Cs - 137	4.19E-03	Solid	WAC 246-247-030(21)(a)
Beta/Gamma release rate based on Cs-137. CS-137 is representative of the Beta/gamma-emitting radionuclides present.			

The radioactive isotopes identified for this emission unit are (no quantities specified):

Am - 241 Cs - 137

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

4) PERIODIC CONFIRMATORY MEASUREMENTS

Periodic Confirmatory Measurements (PCM) for the passively vented emissions shall be provided by the established near facility monitoring and augmented by radiological surveys during personnel decontamination operations (e.g., smears and hand-held radiation monitoring measurements of the interior/exterior of the decontamination trailer). These methods are intended to demonstrate compliance by showing that while remaining under the contamination levels by which work is controlled, the actual emissions inherently will be below the emission estimates.

this is an internal boiler plate that I cannot edit

Emission Unit ID: 1243

200 200 W-TRUDECON-001

Decon Trailer TRU Waste Retrieval (Intermit. Op.)

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Miscellaneous Support Facilities

Abatement Technology BARCT WAC 246-247-040(3), 040(4)

state only enforceable: WAC 246-247-010(4), 040(5), 060(5)

Zone or Area	Abatement Technology	Required # of Units	Additional Description

Monitoring Requirements

state enforceable: WAC 246-247-040(5), 060(5), and federally enforceable: 40 CFR 61 subpart H

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-075[2]	40 CFR 61, Appendix B, Method 114	Each radionuclide that could contribute greater than 10 percent of the potential-to-emit TEDE	Per the sitewide ambient monitoring program samples will be collected from the existing near-facility monitoring stations

Sampling Requirements Per the sitewide ambient monitoring program

Additional Requirements

See Section 5 of the general conditions in this license for additional information.

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Operational Status

This Emission Unit has 1 active Notice(s) of Construction.

Project Title	Approval #	Date Approved	NOC_ID
Decontamination Trailer at the Transuranic Waste Retrieval Project (Replaces NOC 851)		Not Approved	1018

Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)

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This is a internal boiler plate that I cannot be changed by me.

4

AIR 16-801
NOC 1018

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

August 10, 2016

CERTIFIED MAIL
7004 2890 0001 9162 0869

Ms. Stacy Charboneau, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352

Re: 28-Day Draft Approval of Notice of Construction (NOC) 1018

Reference: Email (LB# 4751), from John Schmidt (WDOH) to Multiple USDOE Staff, "NOC Consolidation", dated June 30, 2016.

Ms. Charboneau:

As per the reference email, we have worked with your staff to make changes to move the emission unit (EU) in this license from a one-to-many, to a one-to-one relationship. We appreciate your cooperation and willingness to support our future database needs and to make license actions more efficient and cost effective moving forward.

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), the updates will be approved according to the enclosed License for:

Decontamination Trailer at the Transuranic Waste Retrieval Project (Replaces NOC 851) (NOC 1018, EU 1243)

The Washington State Department of Health (DOH) considers the conditions, controls, monitoring requirements, and limitations of the License integral to approval of your application.

This approval shall take effect, and a final approval letter issued, twenty-eight (28) days after you receive this letter, unless you apply for an adjudicative proceeding, as described below.

If you accept the conditions and limitations of this approval and do not wish to apply for an adjudicative proceeding, but wish to proceed under this approval before the 28 days have elapsed, please notify us in writing and the DOH will issue a final approval letter. Your notice should be mailed or faxed to:

DOH – Office of Radiation Protection
Radioactive Air Emissions Section
309 Bradley Blvd., Suite 201
Richland, Washington 98352
FAX: (509) 946-0876

If there are concerns with the conditions and limitations of the approval, please notify the DOH. If attempts to resolve the concerns fail, the DOH will deny your application and you may contest the conditions and limitations of this approval, within 28 days of receipt, by filing the enclosed Request for Adjudicative Proceeding or a document providing substantially the same information with the DOH, Adjudicative Service Unit (ASU), in a manner that shows proof of service on the ASU. The ASU's address is:

DOH - Adjudicative Service Unit
310 Israel Road SE
P.O. Box 47879
Olympia, Washington 98504-7879

You must include a copy of this approval with your application. FILING SHALL NOT BE DEEMED COMPLETE UNTIL THE ADJUDICATIVE SERVICE UNIT ACTUALLY RECEIVES YOUR APPLICATION.

If you have any questions regarding this draft approval, please contact Mr. Thomas Frazier at thomas.frazier@doh.wa.gov or by phone (509) 946-0774.

Sincerely,

P. John Martell, Manager
Radioactive Air Emissions Section

Enclosures: 1. Conditions and Limitations for EU 1243 (NOC 1018)
2. Request for Adjudicative Proceedings

cc: (see next page)

cc: Ruth Allen, WRPS
Matthew Barnett, PNNL
Shawna Berven, WDOH
Lucinda Borneman, WRPS
Lee Bostic, BNI
Cliff Clark, USDOE-RL
Jack Donnelly, WRPS
Rick Engelmann, CHPRC
Dennis Faulk, EPA
Eric Faust, USDOE-RL
Thomas Frazier, WDOH
Gary Fritz, MSA
Philip Gent, Ecology
Reed Kaldor, MSA
Paul Karschnia, CHPRC
Ed MacAlister, USDOE-RL
Valarie Peery, Ecology
John Schmidt, WDOH
Jeff Voogd, WRPS
Davis Zhen, EPA
Environmental Portal
RAES Tracking: Line 16-126; EU 1243; NOC 1018

Emission Unit ID: 1243

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Sampling Requirements *Per the sitewide ambient monitoring program*

Additional Requirements

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Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status

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STATE OF WASHINGTON
DEPARTMENT OF HEALTH
ENVIRONMENTAL HEALTH PROGRAMS
OFFICE OF RADIATION PROTECTION

In Re The Approval of:
28-DAY DRAFT APPROVAL OF NOTICE OF CONSTRUCTION (NOC) 1018

Docket No:
REQUEST FOR ADJUDICATIVE PROCEEDING

Approval No: **AIR 16-801**

THE STATE OF WASHINGTON TO:

Ms. Stacy Charboneau, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352

If you wish to request an adjudicative proceeding, you or your attorney must COMPLETE AND FILE THIS FORM OR A DOCUMENT PROVIDING SUBSTANTIALLY THE SAME INFORMATION WITH THE DEPARTMENT OF HEALTH ADJUDICATIVE SERVICE UNIT WITHIN TWENTY-EIGHT (28) DAYS OF YOUR RECEIPT of this Request for Adjudicative Proceeding form and a copy of the Office of Radiation Protection's approval, **AIR 16-801.**

You must file your application in a manner that shows proof of service on the Adjudicative Service Unit, at the following address:

Department of Health
Adjudicative Service Unit
310 Israel Road S.E.
P.O. Box 47879
Olympia, WA 98504-7879

With your application, you must include a copy of the Office of Radiation Protection's approval.

FILING SHALL NOT BE DEEMED COMPLETE UNTIL THE ADJUDICATIVE SERVICE UNIT ACTUALLY RECEIVES YOUR APPLICATION.

YOU HAVE THE RIGHT TO a formal hearing in this matter conducted pursuant to Revised Code of Washington (RCW) 43.70.115, Chapter 34.05 RCW, and Chapter 246-10 of the Washington Administrative Code (WAC). Alternatively, you may waive the formal hearing and submit a written statement and supporting documents setting out your position, your defenses, and any mitigating circumstances that you wish to bring to the Department's attention.
You have the right to be represented by an attorney at your own expense.

I.

[ ] I **WILL BE** represented by an attorney. His/her name, address, and phone number are:

Name:

Address:

Phone:

[ ] I **WILL NOT BE** represented by an attorney.

If after submitting this request, you obtain attorney representation or change attorneys, you must notify the Adjudicative Service Unit.

II.

[ ] I **DO NOT** waive my right to a formal hearing.

[ ] I **DO** waive my right to a formal hearing. I understand that if I waive my right to a formal hearing, the Department may decide this matter solely with reference to information in the Department's possession and to such written statements and supporting documents as I may have submitted.

If you choose to waive your right to a formal hearing, please complete the following:

[ ] I **AM NOT** submitting documents to the Department in support of my position.

[ ] I **AM** submitting a sworn statement and/or other documents to the Department in support of my position. Instructions - Please indicate your responses below:

If you are submitting documents to the Department, please list and briefly identify all such documents in the space provided below and on any additional sheet that may be necessary.

III.

ADMISSION/DENIAL OF CONDITIONS OR LIMITATIONS

The Office of Radiation Protection's approval **AIR 16-801**, dated **August 10, 2016,** contains conditions and limitations set out as numbered paragraphs. In the space below you must indicate, in good faith, whether you admit, or do not contest, or deny the conditions or limitations. Conditions or limitations denied or not contested may later be admitted. Conditions or limitations admitted or not contested shall be conclusively deemed true for further proceedings.

Instructions: I admit, deny, or do not contest the conditions or limitations as follows (fill in the appropriate paragraph number):

	Admit	Deny	Do Not Contest
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]
Paragraph _____	[ ]	[ ]	[ ]

Please attach any additional sheets that may be necessary to respond to all allegations.

If you have chosen not to waive your rights to a formal hearing, please state all grounds for contesting this matter in the space provided below and on any additional sheets that may be necessary.

IV.

You have the right to an interpreter, appointed at no cost, if you are a hearing impaired person or limited English speaking person. If any witness for you is a hearing impaired person or a limited English speaking person, an interpreter will be appointed at your expense.

I **[DO]** / **[DO NOT]** (circle one) request an interpreter be appointed. If an interpreter is requested, please indicate the person or persons for whom an interpreter is required and their primary language, and/or whether they are hearing impaired.

IF YOU FAIL TO FILE YOUR APPLICATION IN A TIMELY MANNER, OR IF YOU FILE YOUR APPLICATION TIMELY BUT FAIL TO APPEAR AT ANY SCHEDULED SETTLEMENT CONFERENCE, PREHEARING CONFERENCE, OR HEARING WITHOUT LEAVE TO DO SO, THE DEPARTMENT MAY DECIDE THIS MATTER WITHOUT YOUR YOUR PARTICIPATION AND WITHOUT FURTHER NOTICE TO YOU.

DATED this_____ day of _____, _____

_____
Party

_____
Party's Representative (if any)

WSBA #: _____

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Stacey Charboneau, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, WA 99352

9590 9402 1337 5285 0587 73

2. Article Number (Transfer from service label)

7004 2890 0001 9162 0869

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery
[illegible] 8/15/16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RICHLAND WA 99352 AUG 15 2016 USPS

3. Service Type
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over $500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 — Domestic Return Receipt

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Sent To
Street, Apt. No.; or PO Box No.
City, State, ZIP+4

16801

PS Form 3800, June 2002 — See Reverse for Instructions

7004 2890 0001 9162 0869

5

UB#4828

AIR 16-903
NOC 1018

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

September 14, 2016

Mr. Doug Shoop, Manager
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352

Re: Final Approval of Notice of Construction (NOC) 1018

Mr. Shoop:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your license was approved, as negotiated, on September 12, 2016, according to the enclosed EU specific license:

Decontamination Trailer at the Transuranic Waste Retrieval Project (Replaces NOC 851) (NOC 1018, EU 1243)

The conditions, controls, monitoring requirements, and limitations of this license must be observed in order for you to be in compliance with WAC 246-247. Failure to meet any provision of this license may result in the revocation of approval, the issuance of Notices of Violation, or other enforcement actions under WAC 246-247-100.

If you have any questions regarding this approval, please contact Tom Frazier at Thomas.Frazier@doh.wa.gov or (509) 946-0774).

Sincerely,

John Martell, Manager
Radioactive Air Emissions Section

Enclosure: NOC 1018 for EU 1243

cc: (see next page)

cc: Ruth Allen, WRPS
Matthew Barnett, PNNL
Shawna Berven, WDOH
Lilyann Bauder, Ecology
Lucinda Borneman, WRPS
Lee Bostic, BNI
Cliff Clark, USDOE-RL
Jack Donnelly, WRPS
Rick Engelmann, CHPRC
Dennis Faulk, EPA
Thomas Frazier, WDOH
Eric Faust, USDOE-RL
Gary Fritz, MSA
Phil Gent, Ecology
Reed Kaldor, MSA
Paul Karschnia, CHPRC
Ed MacAlister, USDOE-RL
Valarie Peery, Ecology
Maria Skorska, Ecology
John Schmidt, WDOH
Jeff Voogd, WRPS
Joan Woolard, MSA
Davis Zhen, EPA
Environmental Portal
RAES Tracking: Line 16-126; EU 1243; NOC 1018

Emission Unit ID: 1243

200 200 W-TRUDECON-001

Decon Trailer TRU Waste Retrieval (Intermit. Op.)

This is a MINOR, PASSIVELY ventilated emission unit.

Miscellaneous Support Facilities

Abatement Technology BARCT WAC 246-247-040(3), 040(4)

state only enforceable: WAC 246-247-010(4), 040(5), 060(5)

Zone or Area	Abatement Technology	Required # of Units	Additional Description

Monitoring Requirements

state enforceable: WAC 246-247-040(5), 060(5), and federally enforceable: 40 CFR 61 subpart H

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-075[2]	40 CFR 61, Appendix B, Method 114	Each radionuclide that could contribute greater than 10 percent of the potential-to-emit TEDE	Per the sitewide ambient monitoring program samples will be collected from the existing near-facility monitoring stations

Sampling Requirements Per the sitewide ambient monitoring program

Additional Requirements

See Section 5 of the general conditions in this license for additional information.

Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status

This Emission Unit has 1 active Notice(s) of Construction.

Project Title	Approval #	Date Approved	NOC_ID
Decontamination Trailer at the Transuranic Waste Retrieval Project (Replaces NOC 851)	AIR 16-903	9/12/2016	1018

Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)

1) The total abated emission limit for this Notice of Construction is limited to 1.55E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).

2) This approval applies only to those activities described below. No additional activities or variations on the approved activities that constitute a "modification" to the emission unit, as defined in WAC 246-247-030(16), may be conducted.

All work will be performed in accordance with approved radiological control methods and as low as reasonably achievable (ALARA) program requirements. These requirements will be carried out through radiological control procedures.

The general physical processes associated with decontamination activities in the decontamination trailer will consist of the following:

- On identification of the need for additional decontamination of personnel, affected individuals will be escorted to the decontamination trailer.

- As appropriate, contaminated clothing, coverings, and/or articles will be removed, packaged, and dispositioned in accordance with applicable facility waste handling procedures.

- Personnel decontamination processes might include various methods or a combination of

cleaning agents (e.g., soap and water, pre-moistened towelettes, shaving cream-type foam decontamination agents for facial areas; removal of hair; and abrasive soaps for toughened skin surfaces [e.g., hands and feet]).

- Spent decontamination solutions will be transferred from the holding tanks directly to a mobile disposal unit or containerized (e.g., packaged in absorbents in drums or placed in drums or carboys) and transported to existing facilities on the Hanford Site for disposal.

Periodic maintenance inspections of the decontamination trailer will be performed without use of containment or portable exhausters.

3) The PTE for this project as determined under WAC 246-247-030(21)(a-e) [as specified in the application] is 1.55E-05 mrem/year. Approved are the associated potential release rates (Curies/year) of:

Am - 241	8.37E-04	Solid	WAC 246-247-030(21)(a)
Alpha release rate based on Am-241. Any radionuclide might be present Am-241 is representative of the alpha-emitting radionuclides present.			
Cs - 137	4.19E-03	Solid	WAC 246-247-030(21)(a)
Beta/Gamma release rate based on Cs-137. CS-137 is representative of the Beta/gamma-emitting radionuclides present.			

The radioactive isotopes identified for this emission unit are (no quantities specified):

Am - 241 Cs - 137

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

4) PERIODIC CONFIRMATORY MEASUREMENTS

Periodic Confirmatory Measurements (PCM) for the passively vented emissions shall be provided by the established near facility monitoring and augmented by radiological surveys during personnel decontamination operations (e.g., smears and hand-held radiation monitoring measurements of the interior/exterior of the decontamination trailer). These methods are intended to demonstrate compliance by showing that while remaining under the contamination levels by which work is controlled, the actual emissions inherently will be below the emission estimates.