



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

IM# 8,716

OCT 01 2015

15-ECD-0046

RECEIVED

OCT -2 2015

WA Dept of Health  
Radioactive Air Emissions Section

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)

Mr. Martell:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITS THE REPORT OF CLOSURE FOR REMOVAL OF TWELVE DIFFUSE AND FUGITIVE NOTICE OF CONSTRUCTION ACTIVITIES FROM THE HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

This letter submits the License/As Low As Reasonably Achievable Control Technology Revision Request: Report of Closure for 12 Notice of Construction Identification activities contained in the Hanford Site Radioactive Air Emissions License Number FF-01, and the Hanford Site Air Operating Permit, Number 00-05-006 (Attachment 1). The Report of Closure is being submitted because the activities in the 12 Notice of Constructions have been captured in a new diffuse and fugitive license specific for Tank Farms, AIR 15-414, NOC\_ID 945, *Tank Farms Operations Diffuse and Fugitive License (EU 1418)*.

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

ECD:DWB

Attachments: 2

cc: See page 2

  
Kevin W. Smith  
Manager

Mr. John Martell  
15-ECD-0046

-2-

OCT 01 2015

cc w/attachs:

P.M. Gent, Ecology  
R.A. Kaldor, MSA  
R.J. Utley, WDOH  
Environmental Portal, LMSI  
WRPS Correspondence

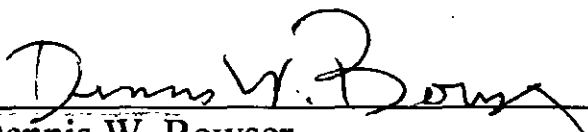
cc w/o attachs:

B.G. Erlandson, BNI  
J. Cox, CTUIR  
R.S. Skeen, CTUIR  
S.L. Dahl, Ecology  
D. Zhen, EPA (Region 10, Seattle)  
G. Bohnee, NPT  
K. Niles, Oregon Energy  
E.T. Faust, RL  
J.W. Schmidt, WDOH  
J.A. Joyner, WRPS  
R. Jim, YN

Attachment 1  
15-ECD-0046  
(2 Pages)

Report of Closure for Twelve Notice of Construction  
Identification (NOC\_ID) Numbers

License/ALARACT Revision Request

  
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: 10/1/15

License Revision  
WDOH Condition Number: \_\_\_\_\_

ALARACT Revision  
New ALARACT Rev. #: \_\_\_\_\_

Report of Closure

#### PROJECT IDENTIFICATION

Project Title: Report of Closure for Twelve Notice of Construction Identification (NOC\_ID) Numbers

Current WDOH NOC Number(s): See table below

WDOH EU ID Number(s): 486

Current WDOH Approval Letter Number(s): See table below

#### 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:

The following twelve NOC\_IDs are superseded by the Tank Farms Operations Diffuse and Fugitive License (NOC\_ID 934) issued April 30, 2015 via letter AIR 15-414.

EU	NOC	WDOH letter#	NOC_ID Title
486	805	11-914	241-SY Tank Farm Ventilation System Upgrades
486	839	12-318	Categorical Tank Farm Facility Entry and Surveillance
486	841	12-320	Tank Farm Restoration and Safe Storage
486	843	12-322	Vapor Sampling of Miscellaneous Underground Units
486	845	12-324	241-AN Tank Farm Installation and operation of a new Ventilation system
486	846	12-325	241-AW Tank Farm Installation and operation of a new Ventilation system
486	854	12-333	Tank Waste Remediation System Vadose Zone Characterization
486	856	12-335	Tank Farm Decontamination Trailer East
486	857	12-336	Tank Farm Decontamination Trailer West
486	863	12-1001	E-525 Double-Shell Tank (DST) Transfer System Modifications Project
486	898	13-807	Sidewall Coring of Single Shell Tanks
486	932	14-910	Removal and Disposal of the Obsolete 242A Evaporator Building K-1 Exhauster*

\*The K-1 Exhauster emission unit should be added to FF-01 Table 2-1.

**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

There is no change of potential continued emissions. Emissions from these activities will continue under the new license AIR 15-414, NOC\_ID 945.

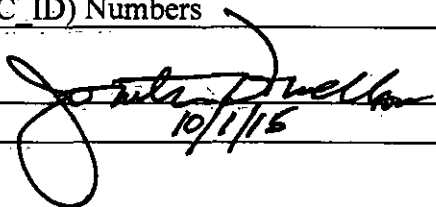
4. Future plans

Tank Farms diffuse and fugitive activities from the closed NOC IDs will continue under the new NOC\_ID 945.

5. Emissions control and monitoring Control and monitoring are described in the new license AIR 15-414, NOC\_ID 945.

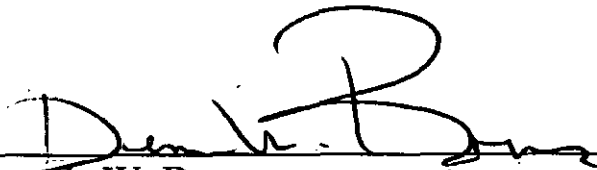
Based on this report of closure, it is requested that the FF-01 license be revised such that the thirteen NOC\_IDs are removed from their respective emission units. In addition, the K-1 exhauster described in Emission Unit 486, NOC\_ID 932 should be added to FF-01 Table 2-1.

**SIGNATURE**

Licensee Name: Department of Energy, Office of River Protection  
Licensee Title: Report of closure for Thirteen Notice of Construction Identification (NOC\_ID) Numbers  
Licensee Signature:   
Date: 10/1/15

Attachment 2  
15-ECD-0046  
(1 Page)

Notification of Change not Requiring Permit Revision

  
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):

<b>Description of the change:</b>
Report of closure for 12 Notice of Construction Identification (NOC_ID) Numbers superseded by Tank Farms Operations Diffuse and Fugitive License, AIR 15-414, NOC_ID 945, issued April 30, 2015. In addition, the 242-A Evaporator K-1 Exhauster emission unit should be added to FF-01 Table 2-1.
<b>Date of change:</b>
The closure date is the submittal date of this closure report.
<b>Describe the emissions resulting from the change:</b>
No change in emissions will occur.
<b>List any permit term or condition that will no longer be applicable as a result of the change:</b>
Emission Unit 486, NOC_IDs 805, 839, 841, 843, 845, 846, 854, 856, 857, 898, 863, and 932.

\* 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.