



IM# 8,633

OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

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15-ECD-0034

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)

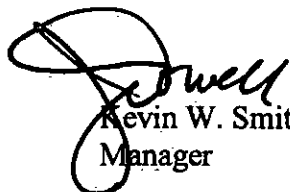
Mr. Martell:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITS THE REPORT OF CLOSURE FOR EMISSION UNITS 1334 AND 1343 CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

U.S. Department of Energy, Office of River Protection hereby submits to Washington State Department of Health the License/As Low As Reasonably Achievable Control Technology Revision Request: Report of Closure for emission units 1334 and 1343 (Attachment 1). Emission unit 1334 is identified as the Mobile Arm Retrieval System (MARS) 001 and emission unit 1343 is identified as MARS 002. Retrieval from Single-Shell Tank 241-C-107 is complete and MARS 001 and 002 are no longer needed. The two emission units are currently in the Hanford Site Air Operating Permit, Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01.

The emission units for both MARS 001 and 002 are breather filters previously installed on a single unit. The breather filters were removed on March 31, 2015. Pictures in Attachment 1 show the before and after configuration. The Notification of Change Not Requiring Permit Revision form (Attachment 2) is needed by Washington State Department of Ecology to process an Air Operating Permit revision. Therefore, the emission units are being proposed for closure.

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


Kevin W. Smith
Manager

ECD:DWB

Attachments: (2)

cc: See page 2

EU 1334 & 1343
INCLUDED AS PART OF NOC 825 REV - SEE LB# 4441

Mr. John Martell
15-ECD-0034

-2-

JUL 23 2015

cc w/attachs:

P.M. Gent, Ecology
R.A. Kaldor, MSA
J.A. Joyner, WRPS
A.G. Miskho, WRPS
Administrative Record
Environmental Portal, LMSI
WRPS Correspondence

cc w/o attachs:

J. Cox CTUIR
S. Harris, CTUIR
D. Zhen, EPA (Region 10, Seattle)
G. Bohnee, NPT
K. Niles, Oregon energy
E.T. Faust, RL
D.R. Hildebrand, RL

Attachment 1
15-ECD-0034
(2 Pages)

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: 07/23/2015

License Revision

WDOH Condition Number: _____

ALARACT Revision

New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: Report of closure for Emission units 1334 and 1343

Current WDOH NOC Number(s): None

WDOH EU ID Number(s): 1334 and 1343

Current WDOH Approval Letter Number(s): AIR 12-307

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 Units 1334 and 1343

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) to document cessation of radionuclide emitting activities.

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. The 2 breather filters were removed from the Mobile Arm Retrieval System (MARS) on March 31, 2015.

2. Remaining material

This MARS unit was used to retrieve waste from single shell tank 241-C-107. Retrieval is complete from tank 241-C-107 and this MARS unit will not be used again.

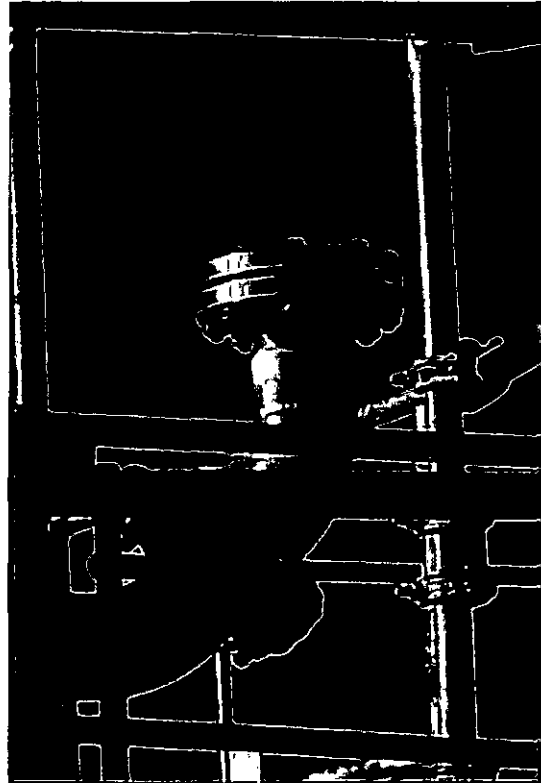
3. Assessment of potential continued emissions

There is no potential for continued emissions because the elbow has been blanked off. See the before and after pictures contained in this license revision request.

Before



After



4. Future plans

There are no plans to operate this MARS unit again.

5. Emissions control and monitoring

- Single Shell tank 241-C-107 will continue to have a passive breather filter installed in accordance with emission unit 230 (200E P-241C107-001).

Based on this report of closure, it is requested that the FF-01 license be revised such that emission units 1334 and 1343 are closed and deleted.

SIGNATURE

Licensee Name: Department of Energy, Office of River Protection

Licensee Title: Emission Unit ID 1334 and Emission Unit ID 1343

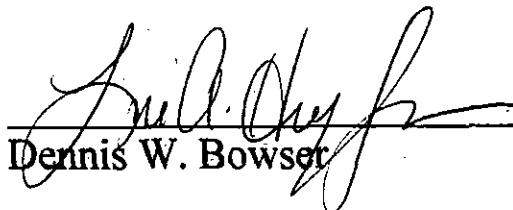
Licensee: _____

Signature: *Justin Powell*

Date: 7/23/15

Attachment 2
15-ECD-0034
(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):

Description of the change:
Report of closure for Emission units 1334 and 1343 Basis: The retrieval associated with single shell tank 241-C-107 is complete and the 2 breather filters were removed on March 31, 2105.
Date of change:
The closure date is the submittal date of this closure report.
Describe the emissions resulting from the change:
Emissions from the licensed passive breather filters will no longer occur.
List any permit term or condition that will no longer be applicable as a result of the change:
Emission units 1334 and 1343 in their entirety.

* 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.