

IM# 7,737



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

JUL 1 2013

13-ESQ-0047

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of Radiation Protection

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Richland, Washington 99354

Dear Addressees:


RADIOACTIVE AIR POLLUTANTS NOTICE OF CONSTRUCTION (NOC) APPLICATION FOR THE LIFE SCIENCES LABORATORY-1 (331 BUILDING), EP-331-09-S EMISSION UNIT, 300 AREA, HANFORD SITE, RICHLAND, WASHINGTON

Enclosed is the new NOC Application for the Life Sciences Laboratory-I (331 Building), EP-331-09-S emission unit (Enclosure 1). The application is for minor potential emissions from the north wing of the 331 Building.

Also enclosed is the Hanford Site Air Operating Permit Off-Permit Change form (Enclosure 2). This form is required to update the annual operating plan.

If you have any questions, please contact me, or your staff may contact Ray J. Corey, Assistant Manager for Safety and Environment, on (509) 376-0108.

Sincerely,


Matt McCormick
Manager

ESQ:DEJ

Enclosures

cc w/encls: See page 2

EU 1370

Addressees
13-ESQ-0047

-2-

JUL 1 2013

cc w/encls:

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Administrative Record (file: 325 Building)

Environmental Portal, LMSI, A3-9

Pacific Northwest National Laboratory

**Radioactive Air Pollutants
Notice of Construction Application**

for the Minor Emission Unit

EP-331-09-S

**Life Science Laboratory – I (331 Building), Revision 0
300 Area, Hanford Site
Richland, Washington**

June 2013

PACIFIC NORTHWEST NATIONAL LABORATORY
Radioactive Air Pollutants Notice of Construction Application
for the EP-331-09-S Emission Unit at the Life Science Laboratory - I (331 Building), Revision 0

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Radioactive Air Pollutants Notice of Construction Application
for the EP-331-09-S Emission Unit at the Life Science Laboratory - I (331 Building), Revision 0

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PACIFIC NORTHWEST NATIONAL LABORATORY
Radioactive Air Pollutants Notice of Construction Application
for the EP-331-09-S Emission Unit at the Life Science Laboratory - I (331 Building), Revision 0

1. Introduction

This document serves as a new Notice of Construction (NOC) application pursuant to the requirements of Washington Administrative Code (WAC) 246-247, "Radiation Protection Air Emissions" (WAC 2011) and Title 40 Code of Federal Regulations (CFR), Part 61, "National Emission Standards for Hazardous Air Pollutants" (EPA 2002) for conducting research activities in the Life Science Laboratory - I (referred to as the 331 Building) minor emission unit EP-331-09-S. The 331 Building is located in the 300 Area of the Hanford Site, and it is a part of the Pacific Northwest National Laboratory (PNNL), which Battelle operates for the U.S. Department of Energy (DOE) under Contract DE-AC05-76RL01830.

2. Facility Location (Response to Item 1)

U.S. Department of Energy, Richland Operations Office
Life Sciences Laboratory – I (331 Building)
Hanford Site, 300 Area
Richland, Washington 99352

Washington Geological Survey 84 Coordinates:
Latitude: 46 degrees, 21 minutes, 53.9 seconds
Longitude: 119 degrees, 16 minutes, 17.2 seconds

The 331 Building is located in the 300 Area within DOE's Hanford Site as shown in Figure 1. It is approximately 4 km (2.2 miles) north of Richland, Washington, and 0.1 km (0.06 miles) west of the Columbia River. The layout of the facility is shown in Figure 2, 3 and 4.

3. Responsible Manager (Response to Item 2)

Matt McCormick, Manager
Richland Operations Office
U.S. Department of Energy
P.O. Box 550, MSIN A7-50
Richland, Washington 99352
509-376-7395

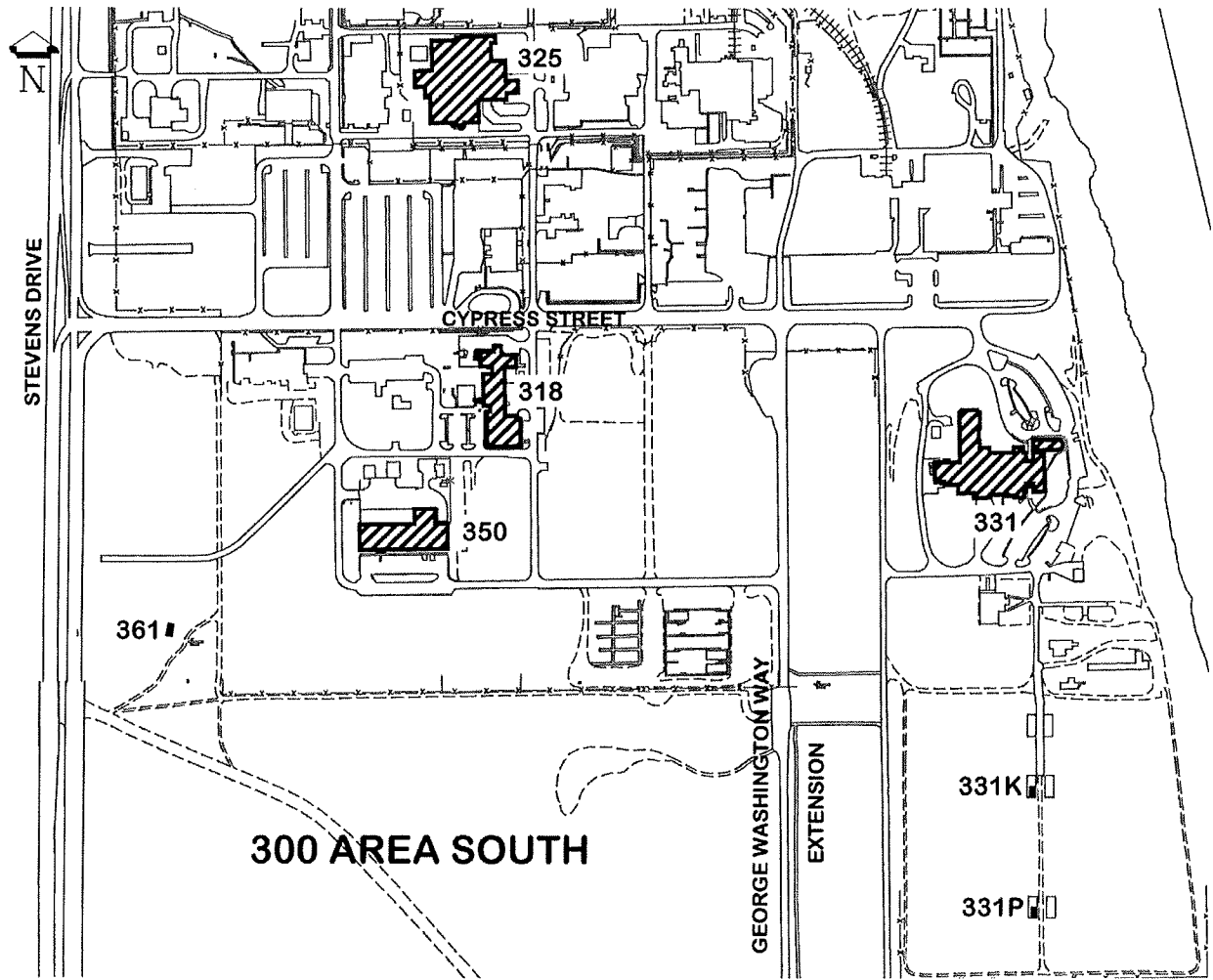


Figure 1. Location of the 331 Building (LSL-I) – Hanford Site 300 Area

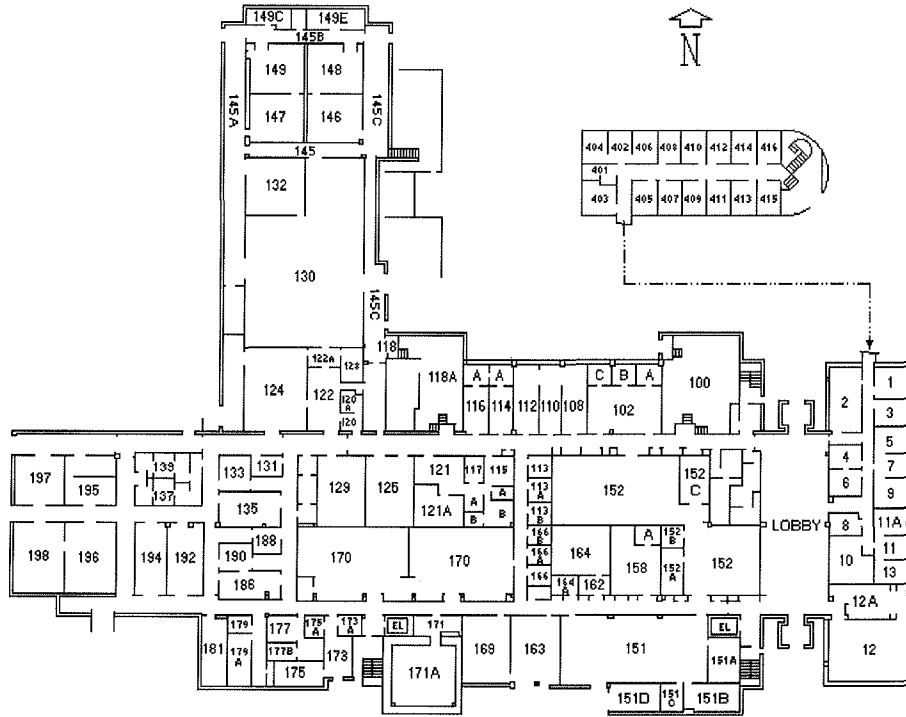


Figure 2. 331 Building (LSL-I) First Floor

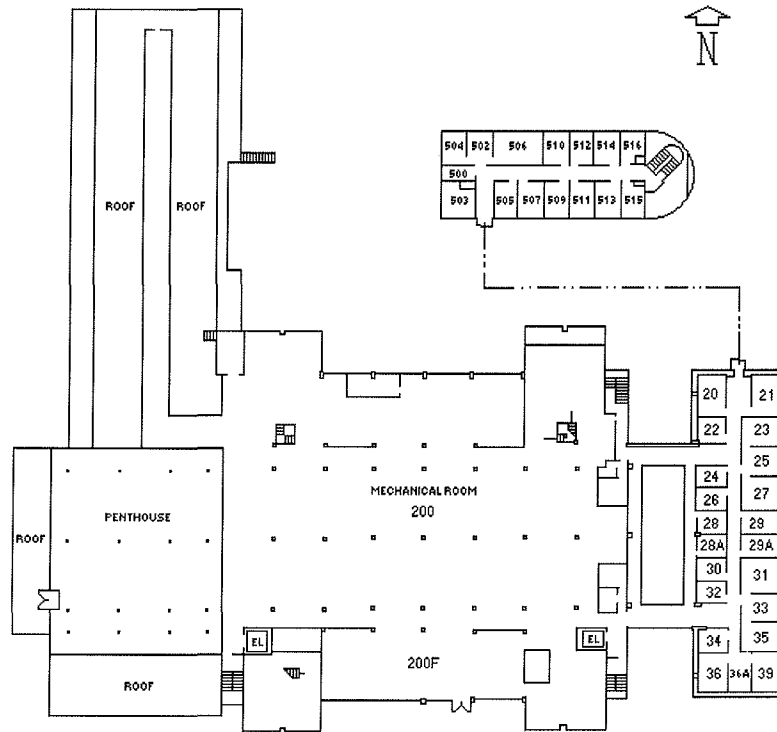


Figure 3. 331 Building (LSL-I) Second Floor

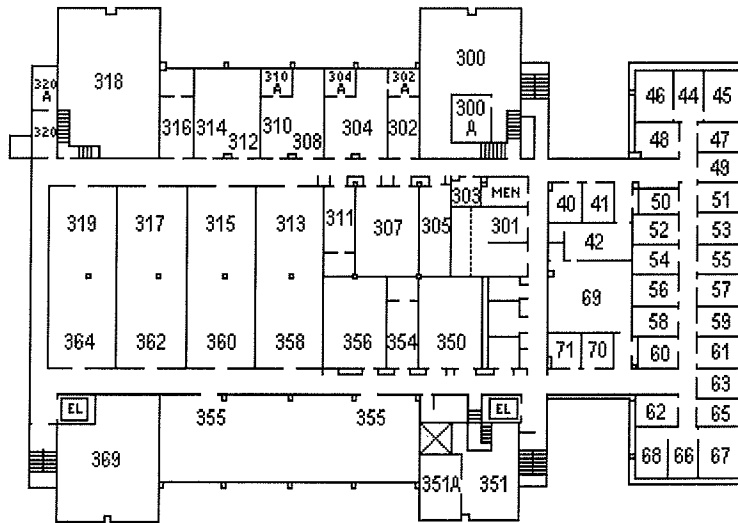


Figure 4. 331 Building (LSL-I) Third Floor

4. Type of Proposed Action (Response to Item 3)

This NOC application is being submitted as a new minor emission unit (EP-331-09-S). Included in the application are the estimated emissions and the potential-to-emit (PTE) total effective dose equivalent (TEDE) to the maximally exposed individual (MEI). The primary proposed action is to use nuclear magnetic resonance (NMR) instruments in the 331 Building EP-331-09-S ventilated air spaces for analysis of non-volatile solid and liquid samples containing radioisotopes. The emission point, as identified below, will be registered as a new 'minor' emission unit (stack) with the Washington State Department of Health (WDOH) and the Environmental Protection Agency (EPA – Region 10).

- EP-331-09-S

5. State Environmental Policy Act (Response to Item 4)

The proposed activities under this NOC are categorically exempt (WAC 197-11-845) from the State Environmental Policy Act (WAC 2003).

6. Process Description (Response to Item 5)

The mission of the 331 Building is to conduct fundamental science and develop environmental technology. Research activities conducted in the 331 Building support the Hanford Site environmental mission and other key DOE missions of national and international importance. Research activities performed within the 331 Building include the use of radioactive materials. Laboratory processes are conducted “continuously” (i.e., year-round, during normal business, swing-shift, night-shift, and weekend hours). The 331 Building provides research capabilities to study the interactions of chemicals and radionuclides with plants, animals, and microorganisms and the fate of chemicals and radionuclides in the environment. The building also has research capabilities for NMR and actinide chemistry.

The research activities conducted in the 331 Building, emission unit EP-331-09-S include:

- Actinide chemistry involving liquids and solids.
- Examining the uptake and transformation effects of radionuclides in soils, plants, animals, and microorganisms.
- Experimental studies with molecular and cellular processes.
- Laboratory setup projects involving fume hood removals/upgrades and ductwork tie-in.
- Measurements of exposures to physical, radiological, and chemical agents.
- Non-dispersible radioactive material used in research programs.
- Nuclear Magnetic Resonance (NMR) spectroscopic experiments with radioactive and non-radioactive materials.
- Processes in which temperatures may exceed 100 °C.
- Research activities involving various types of radioactive material, including mixed activation products (MAPs), mixed fission products (MFPs), and naturally-occurring radioactive material, actinides, and a wide range of standards and tracer radionuclides.
- Studies with radioactive materials in biological and non-biological systems.

7. Annual Possession Quantity and Physical Form (Response to Items 10, 11, and 12)

The Table 1, below, shows the gross alpha and gross beta/gamma annual possession quantity proposed for this emission unit. These values are developed, in part, based on the radionuclides proposed and anticipated to be used in research activities in the 331 Building Emission Unit EP-331-09-S (see Appendix A for the list of contributing isotopes and associated forms). Because of the nature of the work conducted inside the 331 Building (e.g., research and development, basic science with radioactive material), any radionuclide potentially may be present in the facility including the possibility of some trace isotopic contaminants in purified materials and solutions.

The release form in Appendix A is conservatively listed as either a gas or a liquid for the purpose of establishing the gross alpha and gross beta/gamma values in Table 1. The physical form of solid was not used in the table to provide a conservative estimate of the potential radionuclide emissions. The physical form of liquid/particulate solid was used instead of solid and is commensurate with the

process descriptions of Section 6. However, since material recovery is a primary aspect of the research activities, proposed emissions are conservatively estimated in Appendix A.

The list of radioisotopes proposed for this emission unit is included in Appendix B. This list is consistent with PNNL operations; however, many of these radioisotopes will not be present in the emission unit. The actual release form is expected to be particulate solids and liquids, and in some cases a gas. While it is recognized that the building may have processes in which the temperature may be equal to or exceed 100 °C, there is no intent to make the radioactive material an airborne radioactive gas.

Table 1: Summarized Annual Possession Quantity and Potential Emissions for Gross Alpha and Gross Beta/Gamma*

| Radioisotope | Annual Possession Quantity (Ci/yr) | Unabated Release (Ci/yr) |
|--------------|---------------------------------------|-----------------------------|
| Gross Alpha | 1.83E-02 | 1.93E-05 |
| Gross Beta | 5.00E-02 | 5.10E-05 |

*See Appendix A for contributing isotopes and associated forms.

8. Emission Control System (Response to Item 6 and 7)

The 331 Building was constructed in 1970 to accommodate a wide variety of biological and ecological research studies. The three-story building has over 10,000 m² (343,147 ft²) of space with over 100 offices, more than 70 individual laboratories, and specialized areas such as nuclear magnetic resonance laboratories and glove boxes.

The building consists primarily of two laboratory floors with a mechanical-electrical service floor sandwiched in-between. Blending into the building to the west and north is an additional single-story laboratory space. The administrative office area is a three-story building with a two-story addition on the northeast side of the building.

EP-331-09-S exhausts unfiltered air from the north wing of the 331 Building. The emission point (EP-331-09-S) is located atop the north wing of the building and is approximately 14.0 m (46 ft) above grade level and 10.7 m (35 ft) from the top of the roof to the point of discharge. Figure 5 shows the EP-331-09-S emission unit. No emission controls are proposed for this emission unit because of the low quantities of radionuclides proposed for use resulting in a potential to emit (PTE) <0.1 mrem/yr to the maximally exposed individual (MEI). Since no control devices are proposed, the control technology efficiency has been set to 1.0 (see Appendix A) and the abated emissions and doses are the same as the unabated emissions and doses. Inventory controls will be used to maintain low emissions.

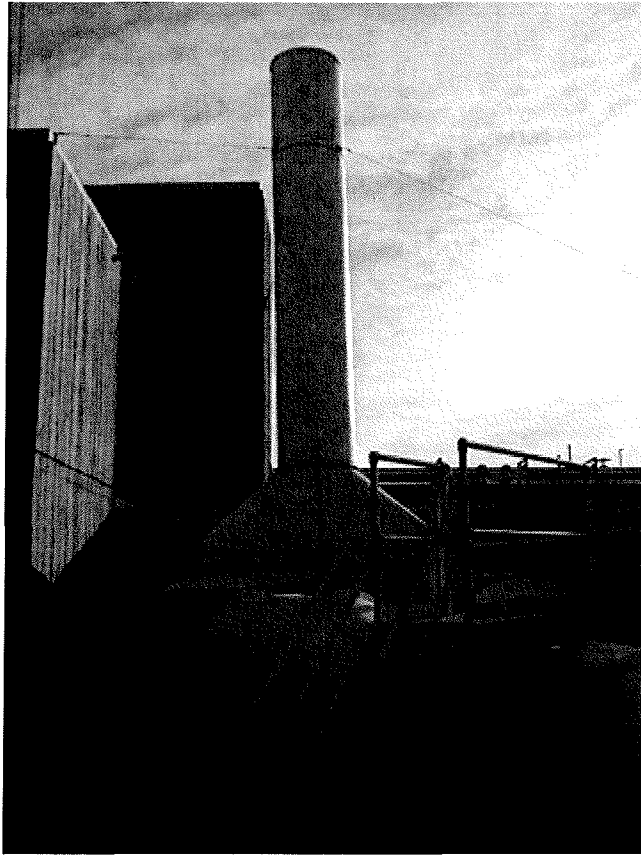


Figure 5. 331 Building EP-331-09-S

8.1 High-Efficiency Particulate Air Filters

N/A – There is no control technology (HEPA filters) proposed for EP-331-09-S.

8.2 Emission Unit Specifics

The emission unit specifications below are provided for informational purposes only and demonstrate unit dose factors for an effective stack height of < 40 m (< 131 ft) are appropriate.

Approximate Stack Height: 14 m (46 ft)
Approximate Stack Diameter: 1 m (40 in.)
Estimated Volumetric Flow Rate: 9.8 m³/s (20,700 cfm)
Estimated Exhaust Velocity: 12.1 m/s (39.6 ft/s)
Nominal Stack Temperature: 24 °C (75°F)
Approximate Effective Stack Height: 37.3 m (122 ft)

9. Monitoring System (Response to Item 9)

This emission unit is identified as PNNL Potential Impact Category 4 (PNNL 2012b). Because the total unabated PTE for this emission unit is < 0.1 mrem/yr total effective dose equivalent (TEDE) to

the MEI, the radionuclide emissions will be determined using 40 CFR 61, Appendix D calculations in lieu of monitoring (EPA 1989).

10. Potential Radionuclide Emissions (Response to Items 8 and 13)

The annual unabated and abated emissions proposed under this application as determined under WAC 246-247-030(21)(a) are $7.03\text{E-}05$ Ci/yr (see Appendix A). These emissions are calculated based on conservative inventory estimates, and the actual possession quantity of specific radionuclides may be greater than estimated in Appendix A and may include radioisotopes identified in Appendix B. The unabated PTE for this emission point is calculated annually and is used to verify compliance with the NOC.

There are no radioisotopes that could contribute > 0.1 mrem/yr to the MEI. Annual possession quantities have been summarized as gross alpha and gross beta/gamma in Table 1. Laboratory processes will be conducted “continuously” (i.e., year-round, during normal business, swing-shift, night-shift, and weekend hours).

The total radioactive air emissions from the 331 Building (EP-331-01-V) during calendar year 2011 were reported as $6.2\text{ E-}6$ mrem. Total emissions from the Hanford Site were reported as 0.042 mrem for calendar year 2011, the most recent year with data available (DOE/RL 2012).

11. Potential Offsite Impact (Response to Items 14 and 15)

The 2011 MEI is located approximately 1.1 km (0.7 mi) to the northeast on a farm near Sagemoor Road in Franklin County, Washington. Dose conversion factors for the MEI were calculated using the EPA-approved dose-modeling program CAP88-PC. The CAP88-PC program-derived dose conversion factors from *Calculating Potential to Emit Radiological Releases and Doses, DOE/RL-2006-29, Rev. 1* were used in determining the potential offsite impact. The unabated and abated doses were calculated by multiplying the potential unabated and abated release quantities by the CAP88-PC derived dose conversion factor. The dose conversion factors used in Appendix A for the 331 Building EP-331-09-S are location based: east emission zone of the 300 Area with an effective release height of < 40 m (< 131 ft). The unit dose factors used are provided in Appendix A (Chaki 2000 and DOE/RL 2010). The physical forms of the radioactive materials listed are considered liquid in form unless designated as a gas; this verifies that the most conservative release rates are used.

The total emission unit annual unabated and abated TEDE to the MEI proposed for this activity as determined under WAC 246-247-030(21)(a) is $9.93\text{ E-}04$ mrem/yr (WAC 2011) (see Appendix A).

12. Cost Factors (Response to Item 16)

No control technologies are proposed therefore cost factors are not discussed here.

13. Facility Lifetime (Response to Item 17)

The estimated lifetime of the 331 Building is approximately 15 years.

14. Technology Standards (Response to Item 18)

There is no proposed control technology for this emission unit; therefore, the standards identified are shown as not applicable.

14.1 American Society of Mechanical Engineers/American National Standards Institute (ASME/ANSI) AG-1

N/A

14.2 ASME/ANSI N509

N/A

14.3 ASME/ANSI N510

N/A

14.4 ANSI/ASME NQA-1

N/A – for Technology Standards

The quality assurance requirements for tracking radiological material are outlined in EM-QA-01, *Effluent Management Quality Assurance Plan* (PNNL 2012a). This plan outlines the Radioactive Material Tracking System (RMT) and the annual NESHAPs assessment that is conducted in PNNL facilities containing radioactive materials. This QA plan is compatible with EPA QA/R-5, *EPA Requirements for Quality Assurance Project Plans* (EPA 2001).

14.5 40 CFR 60, Appendix A

N/A

14.6 ANSI N13.1

N/A

15. References

Chaki S, and B Parks. 2000. *CAP88-PC Version 2.0, Updated User's Guide*. EPA 402-R-00-004. Office of Radiation Programs, U.S. Environmental Protection Agency: Las Vegas, NV.

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U.S. Department of Energy/Richland Operations (DOE/RL). 2010. *Calculating Potential-to-Emit Radiological Releases and Doses*. DOE/RL-2006-29, Revision 1. Richland, WA.

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U.S. Environmental Protection Agency (EPA). 1989. *National Emission Standards for Hazardous Air Pollutants – Estimating Radionuclides Emissions*. 40 CFR 61, Appendix D. US Government Printing Office: Washington, DC.

U.S. Environmental Protection Agency (EPA). 2001. *EPA Requirements for Quality Assurance Project Plans*. EPA QA/R-5. Office of Environmental Information: Washington, DC.

Washington Administrative Code (WAC). 2003. *Department of Health and Social Services*. WAC 197-11-845. Statute Law Committee: Olympia, WA.

Washington Administrative Code (WAC). 2011. *Radiation Protection - Air Emissions*. WAC 246-247. Statute Law Committee: Olympia, WA.

Washington State Department of Health (WDOH). 2004. Letter to Mr. Joel B. Hebdon and Mr. James E. Rasmussen, US DOE, from Allen W. Conklin, WDOH, dated May 25, 2004. AIR 04-504. Olympia, WA.

Appendix A. Annual Possession Quantities and Potential Emissions for Emission Unit EP-331-09-S

| Nuclide | Form ^a | Emission Type ^b | Inventory (Ci y ⁻¹) | Release Fraction | Potential Unabated Emissions (Ci y ⁻¹) | Unit Dose Factor (mrem Ci ⁻¹) ^c | Potential Unabated Dose (mrem y ⁻¹) | Control Technology Efficiency (1.0-Eff.) | Potential Abated Emissions (Ci y ⁻¹) | Potential Abated Dose (mrem y ⁻¹) |
|---------------------|-------------------|----------------------------|---------------------------------|------------------|--|--|---|--|--|---|
| Am-241 ^d | G | a | 1.0E-06 | 1.0E+00 | 1.0E-06 | 7.76E+01 | 7.8E-05 | 1.0E+00 | 1.0E-06 | 7.8E-05 |
| Cs-137 ^c | G | b | 1.0E-06 | 1.0E+00 | 1.0E-06 | 2.33E+00 | 2.3E-06 | 1.0E+00 | 1.0E-06 | 2.3E-06 |
| Np-237 | L | a | 1.1E-03 | 1.0E-03 | 1.1E-06 | 4.27E+01 | 4.7E-05 | 1.0E+00 | 1.1E-06 | 4.7E-05 |
| Pu-238 | L | a | 1.1E-03 | 1.0E-03 | 1.1E-06 | 8.60E+01 | 9.5E-05 | 1.0E+00 | 1.1E-06 | 9.5E-05 |
| Pu-239 | L | a | 5.0E-03 | 1.0E-03 | 5.0E-06 | 9.33E+01 | 4.7E-04 | 1.0E+00 | 5.0E-06 | 4.7E-04 |
| Pu-240 | L | a | 1.1E-03 | 1.0E-03 | 1.1E-06 | 9.33E+01 | 1.0E-04 | 1.0E+00 | 1.1E-06 | 1.0E-04 |
| Tc-99 | L | b | 5.0E-02 | 1.0E-03 | 5.0E-05 | 7.64E-01 | 3.8E-05 | 1.0E+00 | 5.0E-05 | 3.8E-05 |
| Th-232 | L | a | 2.5E-03 | 1.0E-03 | 2.5E-06 | 4.73E+01 | 1.2E-04 | 1.0E+00 | 2.5E-06 | 1.2E-04 |
| U-232 | L | a | 1.0E-06 | 1.0E-03 | 1.0E-09 | 1.71E+01 | 1.7E-08 | 1.0E+00 | 1.0E-09 | 1.7E-08 |
| U-233 | L | a | 2.5E-03 | 1.0E-03 | 2.5E-06 | 6.89E+00 | 1.7E-05 | 1.0E+00 | 2.5E-06 | 1.7E-05 |
| U-234 | L | a | 1.0E-06 | 1.0E-03 | 1.0E-09 | 6.75E+00 | 6.8E-09 | 1.0E+00 | 1.0E-09 | 6.8E-09 |
| U-235 | L | a | 2.5E-03 | 1.0E-03 | 2.5E-06 | 6.03E+00 | 1.5E-05 | 1.0E+00 | 2.5E-06 | 1.5E-05 |
| U-236 | L | a | 1.0E-06 | 1.0E-03 | 1.0E-09 | 6.23E+00 | 6.2E-09 | 1.0E+00 | 1.0E-09 | 6.2E-09 |
| U-237 | L | b | 1.0E-06 | 1.0E-03 | 1.0E-09 | 4.38E-03 | 4.4E-12 | 1.0E+00 | 1.0E-09 | 4.4E-12 |
| U-238 | L | a | 2.5E-03 | 1.0E-03 | 2.5E-06 | 5.61E+00 | 1.4E-05 | 1.0E+00 | 2.5E-06 | 1.4E-05 |
| U-239 | L | b | 1.0E-06 | 1.0E-03 | 1.0E-09 | 4.37E-05 | 4.4E-14 | 1.0E+00 | 1.0E-09 | 4.4E-14 |
| U-240 | L | b | 1.0E-06 | 1.0E-03 | 1.0E-09 | 1.23E-03 | 1.2E-12 | 1.0E+00 | 1.0E-09 | 1.2E-12 |
| Totals | | | 6.8E-02 | | 7.03E-05 | | 9.93E-04 | | 7.03E-05 | 9.93E-04 |

Footnotes to Appendix A:

^a The form is listed as “G” for gases, “L” for liquids. The forms “P” for particulates and “S” for solids are not used.

^b **a** = alpha emitter; **b** = beta (and gamma) emitter.

^c Reference DOE/RL 2010.

^d Alpha emitting representative for activities where the temperature may exceed 100°C

^e Beta emitting representative for activities where the temperature may exceed 100°C

Appendix B. List of Isotopes for Authorized Use

| | | | | | | | | | | |
|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--------|
| Ac-225 | As-74 | Bi-210m | Cd-109 | Cm-244 | Cs-138 | Fe-59 | Hf-179m | I-134m | Kr-87 | Mo-105 |
| Ac-227 | As-76 | Bi-211 | Cd-111m | Cm-245 | Cs-139 | Fr-221 | Hf-181 | I-135 | Kr-88 | N-13 |
| Ac-228 | As-77 | Bi-212 | Cd-113 | Cm-246 | Cs-140 | Fr-223 | Hf-182 | In-106 | Kr-89 | Na-22 |
| Ag-108 | At-217 | Bi-213 | Cd-113m | Cm-247 | Cs-141 | Ga-67 | Hg-203 | In-111 | Kr-90 | Na-24 |
| Ag-108m | Au-195 | Bi-214 | Cd-115 | Cm-248 | Cu-64 | Ga-68 | Ho-163 | In-113m | La-137 | Na-24m |
| Ag-109m | Au-198 | Bk-247 | Cd-115m | Cm-250 | Cu-66 | Ga-70 | Ho-166 | In-114 | La-138 | Nb-91 |
| Ag-110 | Au-198m | Bk-249 | Cd-117 | Co-56 | Dy-159 | Ga-72 | Ho-166m | In-114m | La-140 | Nb-91m |
| Ag-110m | Ba-131 | Bk-250 | Cd-117m | Co-57 | Dy-165 | Gd-148 | I-122 | In-115 | La-141 | Nb-92 |
| Ag-111 | Ba-133 | Br-82 | Ce-139 | Co-58 | Dy-169 | Gd-149 | I-123 | In-115m | La-142 | Nb-93m |
| Al-26 | Ba-133m | Br-82m | Ce-141 | Co-60 | Er-169 | Gd-151 | I-125 | In-116 | La-144 | Nb-94 |
| Al-28 | Ba-137m | Br-83 | Ce-142 | Co-60m | Er-171 | Gd-152 | I-126 | In-116m | Lu-177 | Nb-95 |
| Am-241 | Ba-139 | Br-84 | Ce-143 | Cr-49 | Es-254 | Gd-153 | I-128 | In-117 | Lu-177m | Nb-95m |
| Am-242 | Ba-140 | Br-84m | Ce-144 | Cr-51 | Eu-150 | Ge-68 | I-129 | In-117m | Mg-27 | Nb-97 |
| Am-242m | Ba-141 | Br-85 | Cf-249 | Cr-55 | Eu-152 | Ge-71 | I-130 | Ir-192 | Mg-28 | Nb-97m |
| Am-243 | Ba-142 | C-11 | Cf-250 | Cs-131 | Eu-152m | Ge-71m | I-130m | K-40 | Mn-52 | Nb-98 |
| Am-245 | Ba-143 | C-14 | Cf-251 | Cs-132 | Eu-154 | Ge-75 | I-131 | K-42 | Mn-54 | Nb-100 |
| Am-246 | Be-7 | C-15 | Cf-252 | Cs-134 | Eu-155 | Ge-77 | I-132 | Kr-81 | Mn-56 | Nb-101 |
| Ar-37 | Be-10 | Ca-41 | Cl-36 | Cs-134m | Eu-156 | Ge-77m | I-132m | Kr-81m | Mo-93 | Nb-103 |
| Ar-39 | Bi-207 | Ca-45 | Cm-241 | Cs-135 | Eu-157 | H-3 | I-133 | Kr-83m | Mo-99 | Nd-144 |
| Ar-41 | Bi-208 | Ca-47 | Cm-242 | Cs-136 | F-18 | Hf-175 | I-133m | Kr-85 | Mo-103 | Nd-147 |
| Ar-42 | Bi-210 | Cd-107 | Cm-243 | Cs-137 | Fe-55 | Hf-178m | I-134 | Kr-85m | Mo-104 | Ni-56 |

| | | | | | | | | | | |
|---------|---------|---------|---------|---------|---------|---------|---------|--------|---------|--------|
| Ni-59 | Pb-212 | Po-216 | Rb-83 | Rn-224 | Sm-146 | Ta-182 | Te-127 | Tl-204 | W-188 | Yb-164 |
| Ni-63 | Pb-214 | Po-218 | Rb-84 | Ru-97 | Sm-147 | Ta-182m | Te-127m | Tl-206 | Xe-122 | Yb-169 |
| Ni-65 | Pd-103 | Pr-143 | Rb-86 | Ru-103 | Sm-148 | Ta-183 | Te-129 | Tl-207 | Xe-123 | Yb-175 |
| Np-235 | Pd-107 | Pr-144 | Rb-87 | Ru-105 | Sm-151 | Tb-157 | Te-129m | Tl-208 | Xe-125 | Yb-177 |
| Np-236 | Pd-109 | Pr-144m | Rb-88 | Ru-106 | Sm-153 | Tb-158 | Te-131 | Tl-209 | Xe-127 | Zn-65 |
| Np-237 | Pm-143 | Pu-234 | Rb-89 | S-35 | Sm-157 | Tb-160 | Te-131m | Tm-168 | Xe-127m | Zn-69 |
| Np-238 | Pm-144 | Pu-236 | Rb-90 | Sb-122 | Sn-113 | Tb-161 | Te-132 | Tm-170 | Xe-129m | Zn-69m |
| Np-239 | Pm-145 | Pu-237 | Rb-90m | Sb-124 | Sn-117m | Tc-95 | Te-133 | Tm-171 | Xe-131m | Zr-88 |
| Np-240 | Pm-146 | Pu-238 | Re-186 | Sb-125 | Sn-119m | Tc-95m | Te-133m | U-232 | Xe-133 | Zr-89 |
| Np-240m | Pm-147 | Pu-239 | Re-187 | Sb-126 | Sn-121 | Tc-97 | Te-134 | U-233 | Xe-133m | Zr-93 |
| O-15 | Pm-148 | Pu-240 | Re-188 | Sb-126m | Sn-121m | Tc-97m | Th-227 | U-234 | Xe-135 | Zr-95 |
| O-19 | Pm-148m | Pu-241 | Rh-101 | Sb-127 | Sn-123 | Tc-98 | Th-228 | U-235 | Xe-135m | Zr-97 |
| Os-191 | Pm-149 | Pu-242 | Rh-102 | Sb-129 | Sn-125 | Tc-99 | Th-229 | U-236 | Xe-137 | Zr-98 |
| P-32 | Pm-151 | Pu-243 | Rh-102m | Sc-44 | Sn-126 | Tc-99m | Th-230 | U-237 | Xe-138 | Zr-99 |
| P-33 | Po-208 | Pu-244 | Rh-103m | Sc-46 | Sr-85 | Tc-101 | Th-231 | U-238 | Xe-139 | Zr-100 |
| Pa-231 | Po-209 | Pu-246 | Rh-104 | Sc-47 | Sr-87m | Tc-103 | Th-232 | U-239 | Y-88 | |
| Pa-233 | Po-210 | Ra-223 | Rh-105 | Se-75 | Sr-89 | Tc-106 | Th-233 | U-240 | Y-90 | |
| Pa-234 | Po-211 | Ra-224 | Rh-105m | Se-79 | Sr-90 | Te-121 | Th-234 | V-48 | Y-90m | |
| Pa-234m | Po-212 | Ra-225 | Rh-106 | Se-79m | Sr-91 | Te-121m | Ti-44 | V-49 | Y-91 | |
| Pb-209 | Po-213 | Ra-226 | Rn-219 | Si-31 | Sr-92 | Te-123 | Ti-45 | W-181 | Y-91m | |
| Pb-210 | Po-214 | Ra-228 | Rn-220 | Si-32 | Ta-179 | Te-123m | Ti-51 | W-185 | Y-92 | |
| Pb-211 | Po-215 | Rb-81 | Rn-222 | Sm-145 | Ta-180 | Te-125m | Tl-201 | W-187 | Y-93 | |

HANFORD SITE AIR OPERATING PERMIT

NOTIFICATION OF OFF-PERMIT CHANGE

Permit Number: 00-05-006 Renewal 2

**for the Radioactive Air Pollutants Notice of Construction Application
for the Life Sciences Laboratory-I (331 Building), EP-331-09-S Emission Unit**

This notification is provided to Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as a notice of an off-permit change described as follows.

This change is allowed pursuant to WAC 173-401-724(1), WAC 173-401-724(2), and WAC 173-401-724(6):

1. Change is not specifically addressed or prohibited by the permit terms and conditions,
2. Change does not weaken the enforceability of the existing permit conditions,
3. Change is not a Title I modification or a change subject to the acid rain requirements under Title IV of the FCAA,
4. Change meets all applicable requirements and does not violate an existing permit term or condition,
5. Change has complied with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Provide the following information pursuant to WAC-173-401-724(3):

| | |
|---|-----------------|
| Description of the change: | |
| The mission of the 331 Building is to conduct fundamental science and develop environmental technology. The 331 Building provides research capabilities to study the interactions of chemicals and radionuclides with plants, animals, and microorganisms and the fate of chemicals and radionuclides in the environment. The building also has research capabilities for NMR and actinide chemistry. This modification is for permitting the existing EP-331-09-S emission unit for low potential emissions. | |
| Date of Change: (To be provided in the agency approval order.) | |
| TBD | |
| Describe the emissions resulting from the change: | |
| The permitted potential-to-emit will be low, not require sampling, and be determined using 40 CFR 60, Appendix D. | |
| Describe the new applicable requirements that will apply as a result of the change: (To be provided in the agency approval order.) | |
| TBD | |
| For Hanford Use Only: | |
| AOP Change Control Number: | Date Submitted: |