

McCormick, Ernest R (DOH)

From: Rumburg, Brian P <Brian_P_Rumburg@rl.gov>
Sent: Thursday, September 19, 2013 12:34 PM
To: McCormick, Ernest R (DOH)
Cc: Conrad, James S (Scott); Penn, Lucinda L; Allen, Ruth M
Subject: rptAOP_1371Table1WORD_WRPS_Final.docx
Attachments: rptAOP_1371Table1WORD_WRPS_Final.docx

Hi Ernest,

Here are our comments to the MARS-003 conditions, we have the same comments for MARS-004. If you have any clarifications or questions please give me a call.

Thanks,

** Resp to LB# 3704*

Brian

Brian Rumburg



Contractor to the United States Department of Energy
Retrieval/Closure & Projects Environmental
(509) 373-3438
2440/1500

Emission Unit ID: 1371

200 W-MARS-003

W-MARS-003

This is a MINOR, PASSIVELY ventilated emission unit.

Tank Farms

Emission Unit Information

Stack Height: 134.00 ft. 4.27 m. Stack Diameter: 1.13 ft. 0.34 m.

Average Stack Effluent Temperature: 55 degrees Fahrenheit. 13 degrees Celsius.

Average Stack Exhaust Velocity: 0.25 ft/second. 0.08 m/second.

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
	HEPA Filter	1	Passive breather filters

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
40 CFR 61.93[b][4][i] & WAC 246-247-075[3]	40 CFR 61, Appendix B Method 114	Levels below 10,000 dpm/100cm2 beta/gamma and 200 dpm/100cm2 alpha will verify low emissions.	Every 365 days

Sampling Requirements Smear survey on the inside surface of the ducting and downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent.

Additional Requirements

Radial breather filters shall be replaced every 365 days. Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitation section, if applicable.

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Operational Status The containment box which encloses the MARS will be ventilated by two parallel installed radial filters. The purpose of these filters is to minimize contamination from migrating up from the tank into the containment box via the open space on the large riser during retrieval operations. Minimization of contamination inside the containment box is desired should entry into the box ever be required for repairs. Inflow through these filters during retrieval is estimated to reach up to 60 cubic feet per minute (cfm). A valve will be installed between the filters and the containment box so filters can be isolated from the box. However, because the location of the valve will be approximately 12 feet above ground and difficult to reach without properly installed and inspected scaffolding, the valve will be left open at all times until retrieval of the tank is complete. Once retrieval is complete the valve will be closed.

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

Project Title	Approval #	Date Approved	NOC_ID
Operation of 200 W-MARS-003		Not Approved	899

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 1.31E+00 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 1.61E+03 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).
- 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.

MOBILE ARM RETRIEVAL SYSTEM

The emission units will be clearly identified.