



**OFFICE OF RIVER PROTECTION**

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

**AUG 14 2013**

**RECEIVED**

**AUG 20 2013**

Wa Dept of Health - Office  
of Radiation Protection

13-ECD-0068

Ms. Jane A. Hedges, Program Manager  
Nuclear Waste Program  
Washington State  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Ms. Laurie Kral, Manager  
Office of Air Quality  
U.S. Environmental Protection Agency  
1200 Sixth Ave.  
Seattle, Washington 98101

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)

Addressees:

U.S. DEPARTMENT OF ENERGY (DOE), OFFICE OF RIVER PROTECTION (ORP)  
REQUESTS APPROVAL TO MODIFY THE LICENSE TO OPERATE THE CATEGORICAL  
TANK FARM FACILITY WASTE RETRIEVAL AND CLOSURE PHASE II WASTE  
RETRIEVAL OPERATIONS TO INCLUDE OPERATION OF RADIAL FILTERS FOR THE  
MOBILE ARM RETRIEVAL SYSTEM (MARS) VACUUM

DOE ORP is requesting Washington State Department of Health's review and approval of the Notification of Off-Permit Change to the Categorical Tank Farm Facility Waste Retrieval and Closure Phase II Waste Retrieval Operations for the addition of two radial filters on the new MARS Vacuum for use during waste retrieval operations (Attachment 1). Per the Air Operating Permit, this information is being formally transmitted to the Washington State Department of Ecology and the U.S. Environmental Protection Agency. Attachment 2 is the Certification for Attachment 1.

This permit modification is submitted in compliance with Washington Administrative Code 246-247, "Radiation Protection – Air Emissions."

NOC 825

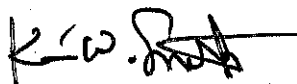
En 50, 57, 58, 486, 498, 789, 885, 886, 1293, 1334, 1343

AUG 14 2013

Addressees  
13-ECD-0068

-2-

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



Kevin W. Smith  
Manager

ECD:DWB

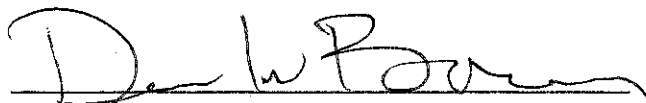
Attachments: (2)

cc w/attachs:

L. Bostic, BNI  
B. G. Erlandson, BNI  
J. Cox CTUIR  
S. Harris, CTUIR  
K. A. Conway, Ecology  
P. M. Gent, Ecology  
D. Zhen, EPA (Region 10, Seattle)  
R. H. Anderson, MSA  
T. G. Beam, MSA  
G. Bohnee, NPT  
K. Niles, Oregon energy  
D. R. Hildebrand, RL  
D. E. Jackson, RL  
J. W. Schmidt, WDOH  
R. M. Allen, WRPS  
S. S. Conrad, WRPS  
L. L. Penn, WRPS  
B. R. Rumburg, WRPS  
Administrative Record  
BNI Correspondence  
Environmental Portal, LMSI  
WRPS Correspondence

Attachment 1  
13-ECD-0068  
(1 Page)

Notification of Off-Permit Change  
Permit Number: 00-05-006, Renewal 2

  
Dennis W. Bowser

## NOTIFICATION OF OFF-PERMIT CHANGE

Permit Number: 00-05-006, Renewal 2

This notification is provided to the 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.

The following changes are 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 AOP terms and conditions;
2. Change does not weaken the enforceability of the existing AOP conditions;
3. Change is not a Title I modification or 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.

### Description of the change:

This change is for the Categorical Tank Farm Facility Waste Retrieval and Closure Phase II Waste Retrieval Operations (WDOH NOC ID Number 825). The current WDOH Approval Letter Number is AIR 12-343. This applies to the AOP Emission Unit Numbers 50, 57, 58, 486, 498, 789, 885, 886, 1293, 1334, and 1343.

It is requested that two parallel radial HEPA filters installed on the MARS Vacuum be added to NOC ID Number 825 permit condition description. Current abated and unabated emissions for this permit will not change due to this addition because these filters will periodically act as tank breather filters. The unabated and abated emission contributions to the current emissions limits from each filter are 5.16E-03 mrem and 2.58E-06 mrem respectively to the offsite MEI. The calculation of the emissions is the same as was submitted and approved by Health for the radial filters on MARS, emission unit IDs 1334 and 1343.

**Date of change:** (To be provided in the agency approval order.)

### Describe the emissions resulting from the change:

Current abated and unabated emissions for this permit will not change due to this addition because these filters will periodically act as tank breather filters which already have the emissions accounted for.

### Describe the new applicable requirements that will apply as a result of the change:

(To be provided in the agency approval order.)

The containment box which encloses the MARS Vacuum will be ventilated by two parallel installed radial HEPA filters. The purpose of these filters is to minimize contamination from migrating up from the tank into the containment box via the open space in 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 HEPA 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 the filters can be isolated from the box. 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.

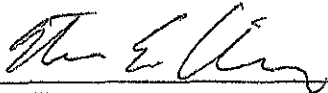
Attachment 2  
13-ECD-0068  
(1 Page)

Certification for WRPS AOP Off-Permit Change Notification to  
Categorical Tank Farm Facility Waste Retrieval and Closure Phase II  
Waste Retrieval Operations

  
Dennis W. Bowser

CERTIFICATION FOR WRPS AOP OFF-PERMIT CHANGE NOTIFICATION TO  
CATEGORICAL TANK FARM FACILITY WASTE RETRIEVAL AND CLOSURE PHASE II  
WASTE RETRIEVAL OPERATIONS

I certify under penalty of law that WRPS input to this document and all attachments that will be included were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



\_\_\_\_\_  
S. E. Killoy, Manager  
Environmental Protection  
Washington River Protection Solutions LLC

6-25-13  
Date