

**USDOE – Hanford Site  
Richland WA  
License: FF-01  
SX Farm Pore Water Extraction Test  
200 200W W-SXPWET-001  
(EU 1391; NOC 904)**

**Licensing File**

**Table of Contents**

- 1) Licensing Checklist
- 2) Application –Report of Closure (IM# 9,497)
- 3) Closeout Approval Letter

Item #

1

**LICENSING CHECKLIST**

(Rev. 4)

*Please initial, as appropriate, rather than placing a check mark*

SDB RAES date received 3/22/17 and IM# assigned 9,497

Licensing Action:

- Renewal (WAC 246-247-060(9))
- Report of Closure (WAC 246-247-080(6))
- Revision (refer to 'modification' - without Appendix A requirements)
- Modification (WAC 246-247-060(1))
- New Facility (WAC 246-247-060(1))
- Replacement in Kind (WAC 246-247-030(22))

SDB Entered into RAES Tracking/RDIT 17-53. Completeness Review due N/A

SDB To HP3 (responsible for facility) for assignment: RANDY LITZKY

RM To assigned HP2: Bern *let me know please*

BJC Add draft Table of Contents and separator pages to file.

Conduct completeness review to determine if all necessary information is provided to allow us to make a decision (use "~~Completeness Review Checklist~~" if Appendix A required) and draft "~~Completeness Notification~~" letter **within 20 days** of RAES date received. Discuss any concerns/issues with HP3 during this 20 day period. *IF complete - skip to page 2!*  
*N/A - completeness checklist does not apply*

Place "Completeness Review Checklist" in license file and prepare draft "Completeness Determination" letter. Letter *must go out within 30 days* of RAES date received.

- If application is incomplete, you may need to repeat this (and prior) step(s).
- If application complete, assign NOC ID and EU ID, as appropriate. **Do NOT** obsolete 'old' NOC, EU, etc. before the new final, approved, license is issued (you may have to exclude the old NOC from AOP for printing purposes).

*N/A - completeness checklist does not apply*

Forward license file and draft "Completeness Determination" letter to HP3 for review. *(If 28-day draft has already been reviewed by licensee and HP3 and is ready to go out at the 30 day mark, you may combine completeness and 28-day draft.)*

*N/A - completeness determination not applicable*

HP3 - work with HP2 to resolve any comments then forward license file and draft "Completeness Determination" letter to HSC for review.

*N/A - completeness determination not applicable*

HSC - work with HP3 to resolve any comments then forward draft "Completeness Determination" letter to AA3 for finalization (HSC will update RAES Tracking/RDIT upon transmittal and will note the 28-Day Draft Due Date, below, upon returning file to you). You now have **60 days** to issue the official 28-Day Draft Approval letter.

28-Day Draft Due Date: \_\_\_\_\_ (See next step, immediately.)

*N/A - completeness determination not applicable*

gdb

Is it necessary to send the 20-Day City Notification? If yes, prepare **ASAP** and forward to HP3 for review (follow same process as above for letter issuance [HP3 -> HSC -> AA3]). HSC will update RAES Tracking/RD TT upon transmittal and will notify you of 20-Day Comment Due Date, below, upon returning the file to you).

- USDOE-RC Hanford Site is exempt from this requirement.
- If RAEL is part of a Materials or Waste license, the responsibility falls on them to notify the city.
- We issue these notifications for *new facility licenses or renewals only*; we do not issue them for modifications or revisions to an existing license.

20-Day Comment Due Date: N/A

B3C

Within 40 days of completeness determined, complete thorough review of application and draft license. Any EU specific conditions must have justification/basis documented in the 'explanation' section of the database. Discuss any concerns/issues with HP3 during this 40 day period. Also, have HSC do an informal review of the license for consistency before sending to the licensee.

\_\_\_\_ HSC Informal License Review  
N/A - no license to review

\_\_\_\_ Send informal draft license to licensee for review, allowing them a week to 10 days to get comments back to you. *Be sure to include a 'due date'.*  
N/A - nothing for licensee to review

\_\_\_\_ Upon receipt of response from licensee, resolve any comments/issues/concerns right away and finalize the draft license and transmittal letter (28-day Draft). **At least 3-5 days** before 28-Day Draft Due Date, send license file; draft transmittal letter, and draft license to HP3 for final review.

N/A - nothing for licensee to review, not a matter involving issuance, denial of, or adverse action against a licensee (WAC 246-70-0222) or a matter to deny, suspend, revoke, or modify a license (WAC 246-10-223(1)(a)(ii)).

\_\_\_\_ HP3 approves and forwards license file and draft letter to HSC for review. HSC reviews and forwards to AA3 for finalization (HSC will hold file until licensee receives 28-day draft).  
N/A - see above

\_\_\_\_ Upon licensee receipt of 28-day draft, HSC will update RAES Tracking/RD TT, verify database concurrence, and return license file to HP2 with due date for licensee response or final issuance of license.  
N/A - see above  
Final Due Date: \_\_\_\_\_

B3C Once licensee has accepted, or the 28 days has expired (**no more than 2-3 days before**), obtain an approval number (AIR#) from AA3 and prepare final license and "Final Approval" letter. Send license file (*be sure table of contents provides for final letter/license*), final transmittal letter, and final license to HP3 for final review.

HP3 HP3 approves and forwards to HSC for review. HSC forwards to AA3 for finalization.

HSC finalizes:

- gdb Add final letter(s)
- gdb Update RAES Tracking/RD TT
- gdb Verify database concurrence - obsoleted both EU + NDC

- gdb Update Licensee List
- gdb Add final file to database "inbox" to be entered/scanned

Item #

2



IM# 9,497

**OFFICE OF RIVER PROTECTION**

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

**MAR 20 2017**

17-ECD-0016

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)

**RECEIVED**  
**MAR 22 2017**  
WA Dept of Health  
Radioactive Air Emissions Section

Mr. Martell:

U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITS REPORTS OF CLOSURE FOR EMISSION UNITS 204 AND 1391 CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

The U.S. Department of Energy, Office of River Protection hereby submits the License / As Low As Reasonably Achievable Control Technology Revision Request Reports of Closure for emission unit 204, 296-A-40 Operation (Attachment 1), and emission unit 1391, SX Farm Pore Water Extraction Test Project (Attachment 2) contained in Hanford Site Air Operating Permit, Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01.

The Notification of Change Not Requiring Permit Revision form (Attachment 3) is needed by the Washington State Department of Ecology to process an air operating permit revision.

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

Kevin W. Smith  
Manager

ECD:DWB

Attachments:

1. 296-A-40 Operation
2. SX Farm Pore Water Extraction Test  
-Project
3. Notification of Change Not Requiring  
Permit Revision

cc: See page 2

Mr. John Martell  
17-ECD-0016

-2-

MAR 20 2017

cc w/attachs:

P.M. Gent, Ecology  
J. McAuly, EPA (Region 10, Seattle)  
R.A. Kaldor, MSA  
E.T. Faust, RL  
BNI Correspondence  
Environmental Portal, LMSI  
WRPS Correspondence

cc w/o attachs:

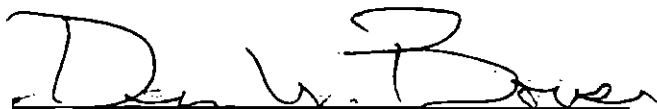
B.G. Erlandson, BNI  
J. Cox, CTUIR  
R.S. Skeen, CTUIR  
S.L. Dahl, Ecology  
G. Böhnee, NPT  
K. Niles, Oregon Energy  
J.W. Schmidt, WDOH  
R.J. Utley, WDOH  
J.A. Joyner, WRPS  
R. Jim, YN  
D. Rowland, YN

Attachment 1  
17-ECD-0016  
(7 Pages Excluding Cover Sheet)

License / ALARACT Revision Request

296-A-40 Operation

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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: 3/20/17

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

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

Report of Closure

#### PROJECT IDENTIFICATION

Project Title: 296-A-40 Operation

Current WDOH NOC Number(s): 1012

WDOH EU ID Number(s): 204

Current WDOH Approval Letter Number(s): AIR 16-201

#### DESCRIPTION OF CHANGE

Number of Attachments: 1

*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 Unit 204**

Refer to the Attachment for photographs of the exhauster location after removal of the exhauster.

#### **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

AP Tank Farm primary exhauster 296-A-40 has been removed. Emissions will be routed through replacement exhausters 296-A-48 (emission unit 1328) and 296-A-49 (emission unit 1329).

4. Future plans

Ventilation in the AP Tank Farm will be will be conducted with replacement exhausters 296-A-48 and 296-A-49.

5. Emissions control and monitoring

Emissions control and monitoring for 296-A-40 are no longer required. Emissions control and monitoring will be conducted for replacement exhausters 296-A-48 and 296-A-49.


Based on this report of closure, it is requested that the FF-01 license be revised such that emission unit 204 is removed.

SIGNATURE

Licensee Name: U.S. Department of Energy, Office of River Protection

Licensee Title: Permittee, Hanford Air Operating Permit and FF-01

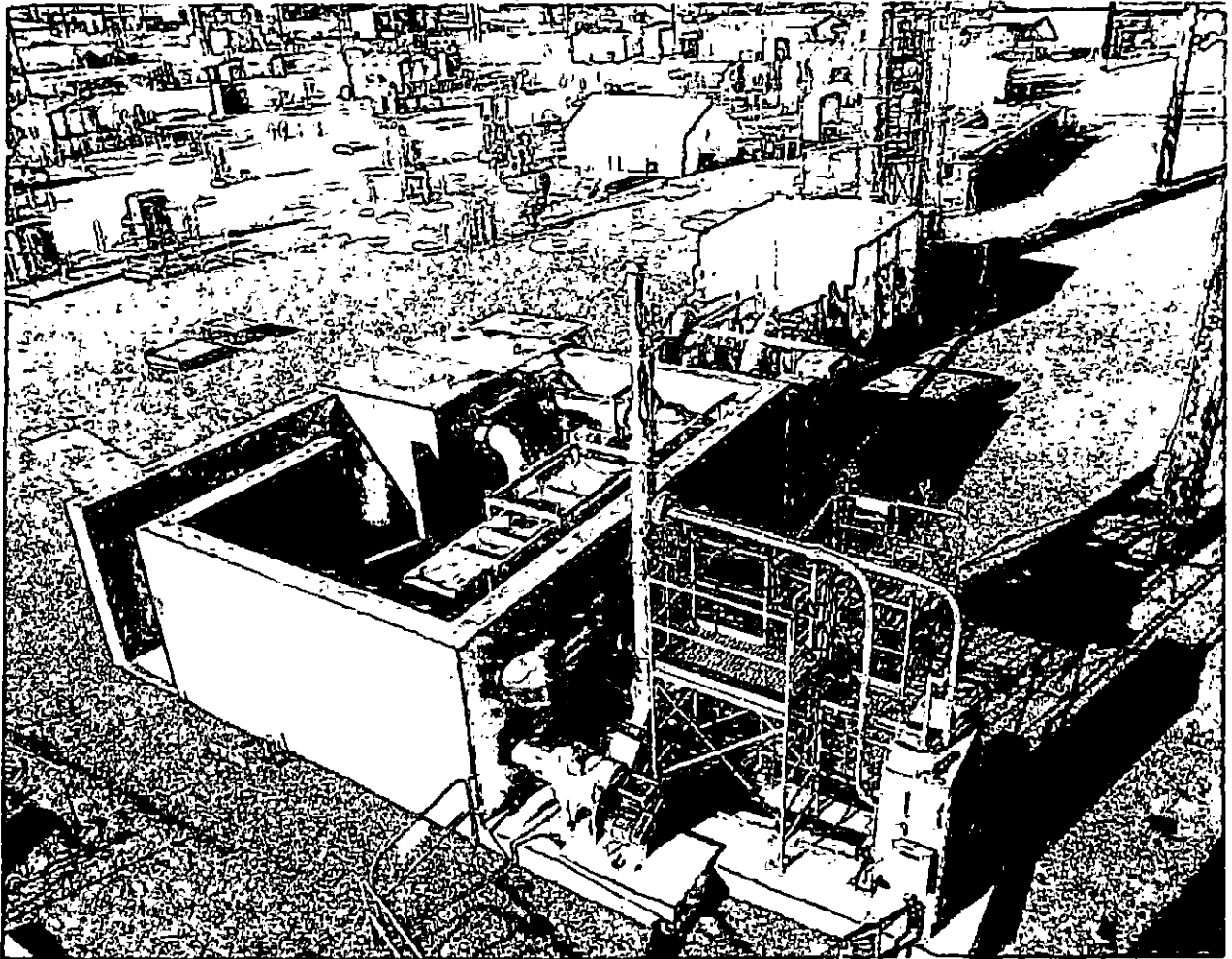
Licensee

Signature: 

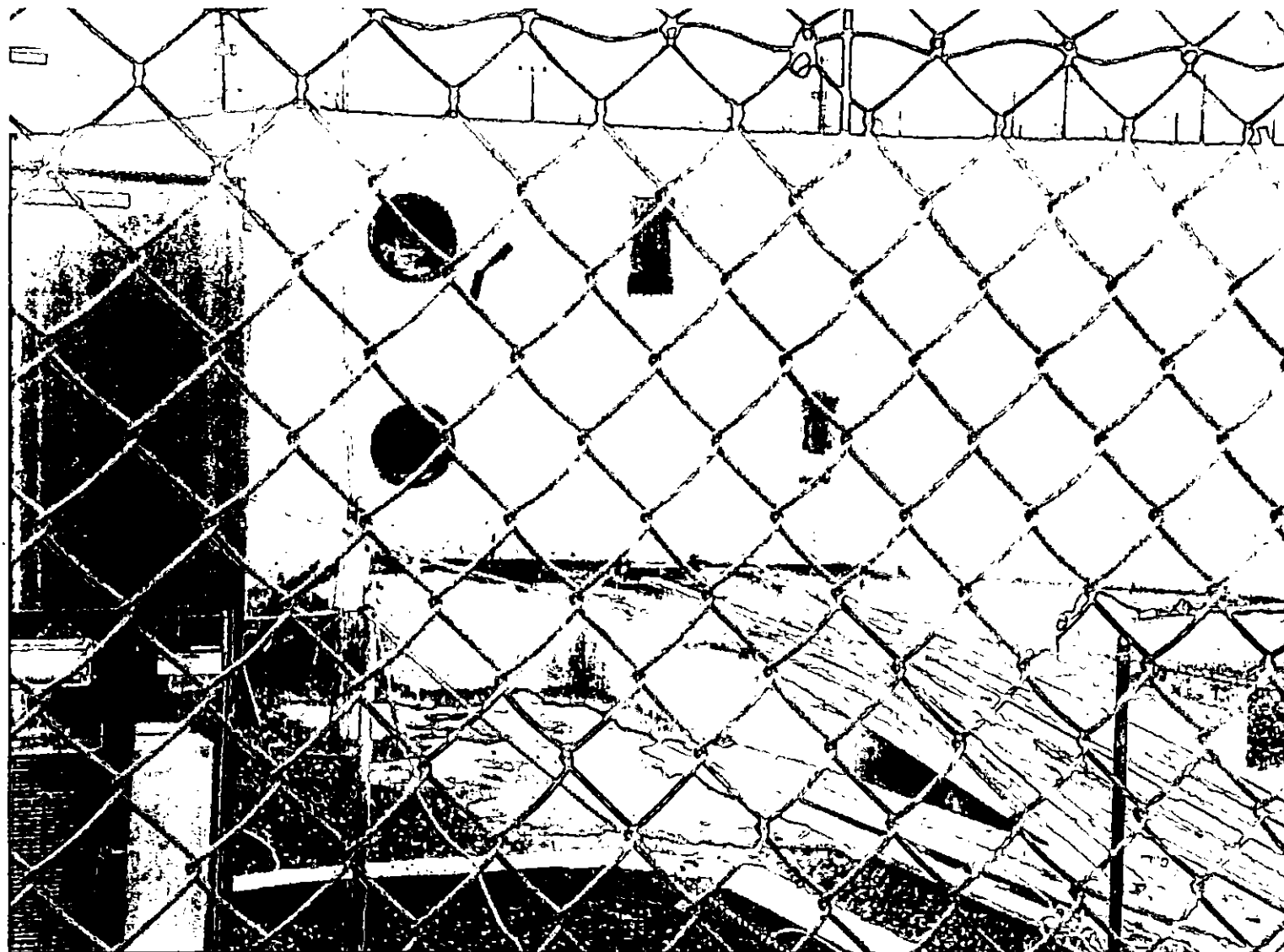
Date: 3/20/17

**Attachment**

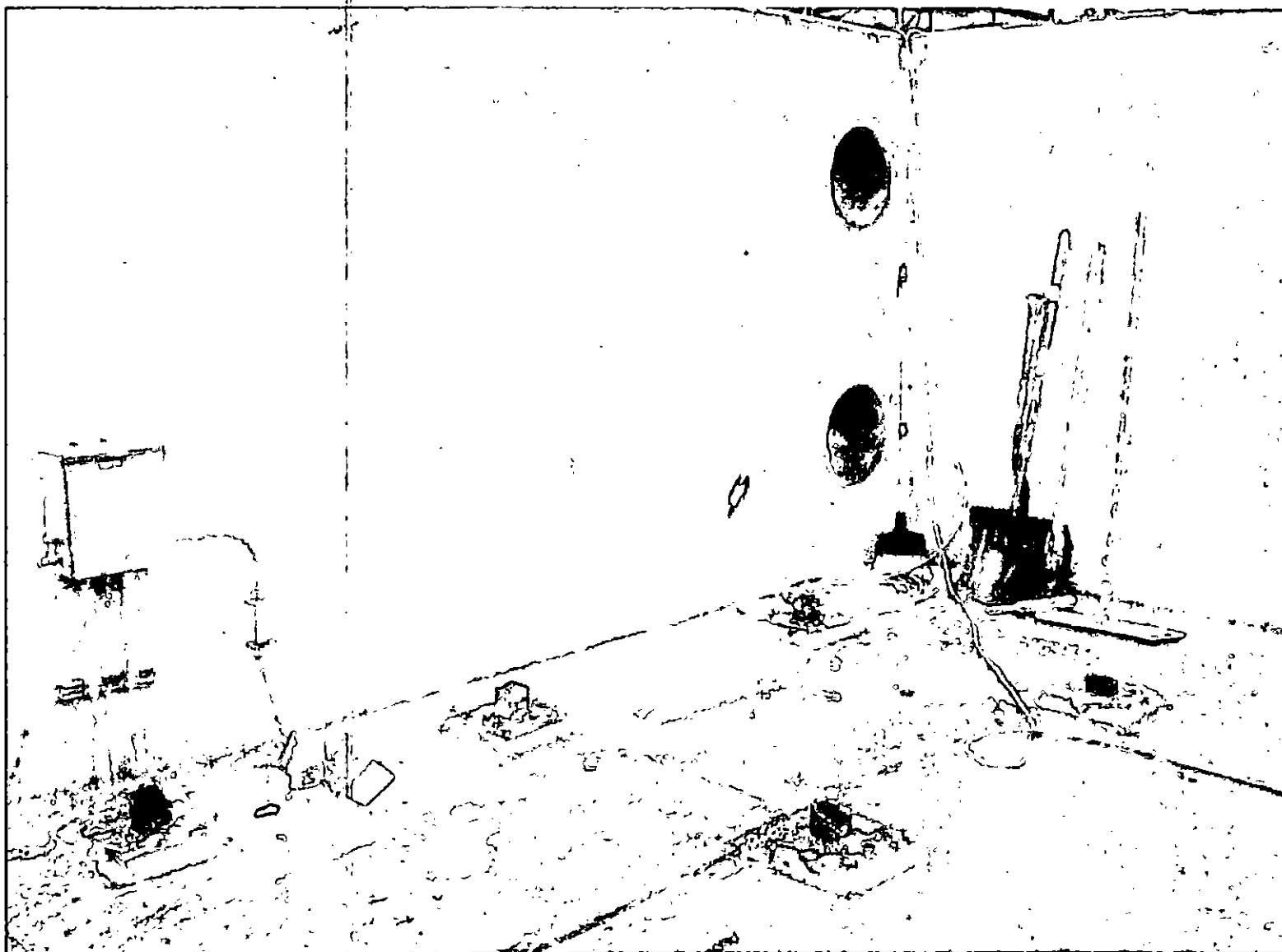
**296-A-40 Demolition Scope**



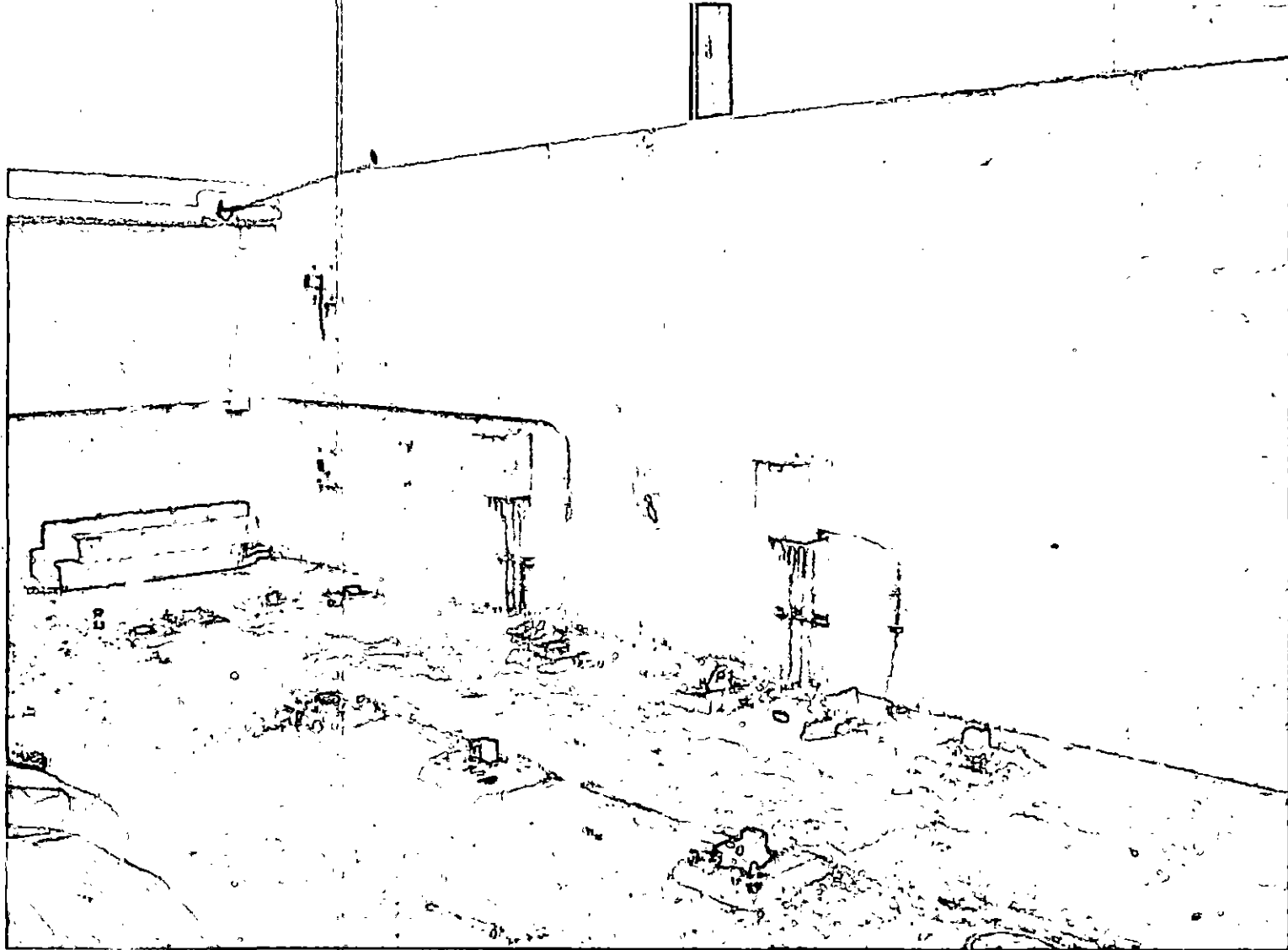
296-A-40 Exhauster Pad Location with Stack Removed



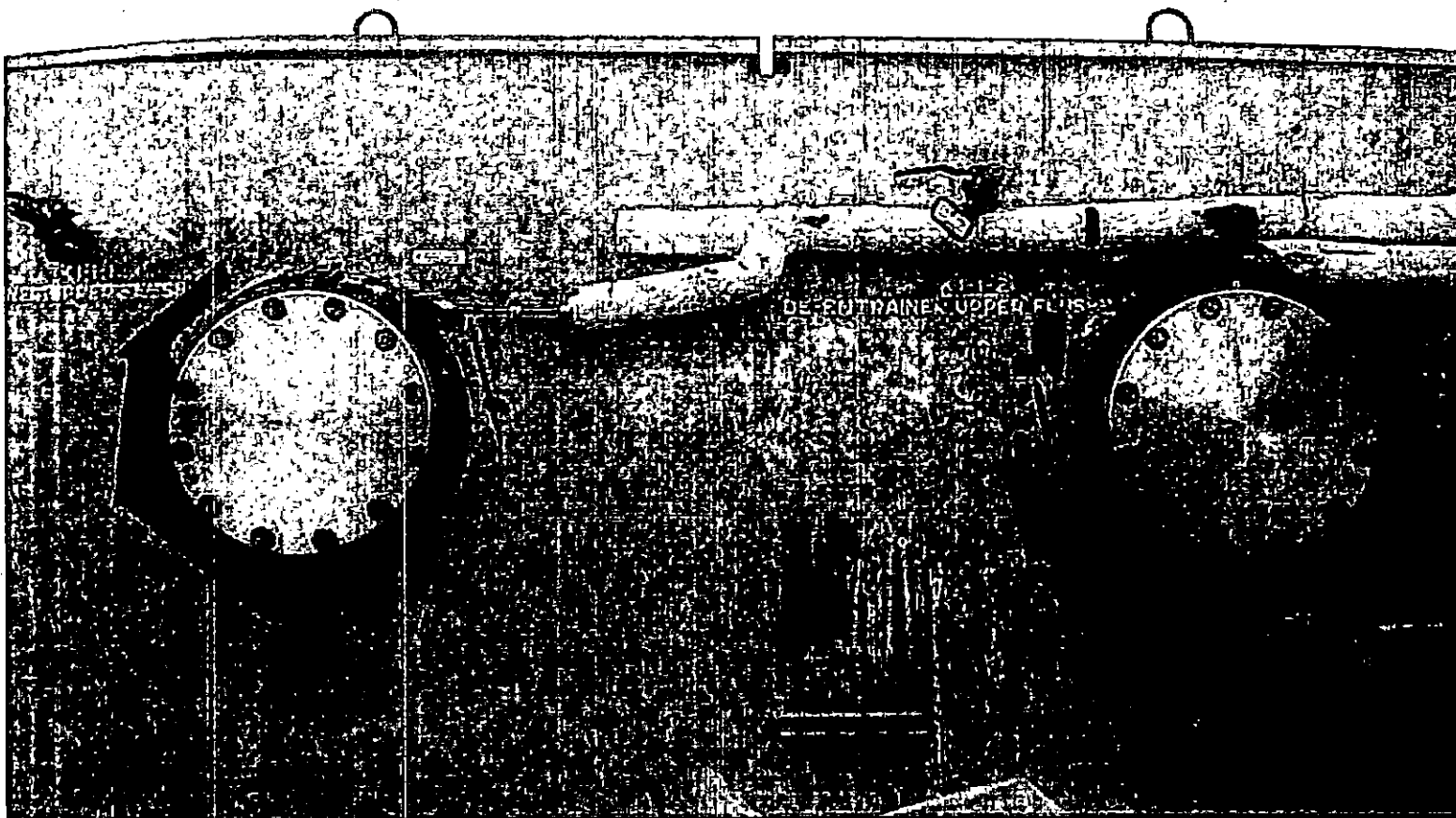
**296-A-40 Exhaust Ports to Stack from inside Concrete Wall with Filter Housing Removed**



**296-A-40 Condensate Drain Lines with Filter Housing Removed**



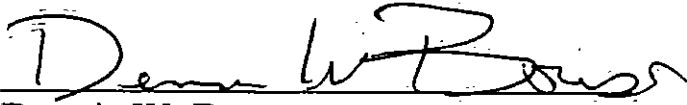
296-A-40 Exhaust Ports from De-Entrainers to Filter Housing Blanked Off



Attachment 2  
17-ECD-0016  
(2 Pages Excluding Cover Sheet)

License / ALARACT Revision Request  
SX Farm Pore Water Extraction Test Project

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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: 3/20/17

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

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

Report of Closure

#### PROJECT IDENTIFICATION

Project Title: SX Farm Pore Water Extraction Test Project  
Current WDOH NOC Number(s): 904  
WDOH EU ID Number(s): 1391  
Current WDOH Approval Letter Number(s): AIR 13-1001

#### 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 Unit 1391**

##### **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 closure.

3. Assessment of potential continued emissions

There will be no continued emissions. The pore water extraction test project has been completed.

4. Future plans

There are no plans to continue the pore water extraction test project. The project has been completed.

5. Emissions control and monitoring

Emissions control and monitoring for the project are no longer required.

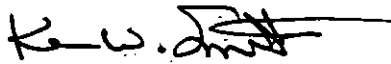
Based on this report of closure, it is requested that the FF-01 license be revised such that emission unit 1391 is removed.

**SIGNATURE**

Licensee Name: U.S. Department of Energy, Office of River Protection

Licensee Title: Permittee, Hanford Air Operating Permit and FF-01

Licensee

Signature: 

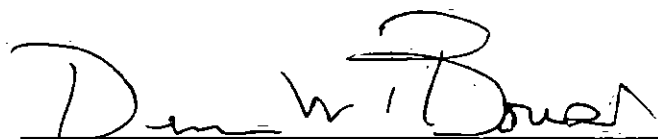
Date: 3/26/17

Attachment 3  
17-ECD-0016  
(1 Page Excluding Cover Sheet)

Notification of Change Not Requiring Permit Revision

Section 502(2)(10) Change

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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 Emission Unit 204, 296-A-40 Operation. Report of closure for Emission Unit 1391, SX Farm Pore Water Extraction Test Project.
<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 204, NOC_ID 1012. Emission Unit 1391, NOC_ID 904.

\* 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.

Item #

3



LB# 5017

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

AIR 17-403  
EUs 204 & 1391

OFFICE OF RADIATION PROTECTION  
309 Bradley Blvd., Suite 201 • Richland, Washington 99352  
TDD Relay Service: 1-800-833-6388

April 11, 2017

Mr. Kevin W. Smith, Manager  
United States Department of Energy  
Office of River Protection  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Re: Report of Closure for Emission Units (EUs) 204 and 1391

Reference: 1. Letter (IM# 9,497), Kevin W. Smith (DOE-ORP) to John Martell (WDOH), "U.S. Department of Energy, Office of River Protection Submits Reports of Closure for Emission Units 204 and 1391 Contained in the Hanford Site Air Operating Permit, Permit Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01" dated 03/20/2017.

Mr. Smith:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your request to close the following EUs is hereby approved.

**296-A-40 Operation  
(EU 204, NOC 1012)**

**SX Farm Pore Water Extraction Test Project  
(EU 1391, NOC 904)**

During the next update of the Hanford Site FF-01 Radioactive Emissions License, these EUs will be removed.

If you have any questions regarding this approval, please contact Ben Conroy at [benjamin.conroy@doh.wa.gov](mailto:benjamin.conroy@doh.wa.gov) or, by phone, at (509) 946-0790.

Sincerely,

John Martell, Manager  
Radioactive Air Emissions Section

cc: (see next page)

Public Health - Always Working for a Safer and Healthier Washington



Mr. Kevin W. Smith

April 11, 2017

Page 2 of 2

AIR 17-403

cc: Ruth Allen, WRPS  
Matthew Barnett, PNNL  
Lilyann Bauder, Ecology  
Shawna Berven, WDOH  
Lucinda Borneman, WRPS  
Lee Bostic, BNI  
Dennis Bowser, USDOE-ORP  
Frank Carleo, CHPRC  
Cliff Clark, USDOE-RL  
Ben Conroy, WDOH  
Jack Donnelly, WRPS  
Dennis Faulk, EPA  
Eric Faust, USDOE-RL  
Gary Fritz, MSA  
Philip Gent, Ecology  
Robert Haggard, BNI  
Daniel Heuston, Ecology  
Jessica Joyner, WRPS  
Reed Kaldor, MSA  
Paul Karschnia, CHPRC  
Jim McAuley, EPA  
Bryan Trimmerger, USDOE-ORP  
Randy Utley, WDOH  
Jeff Voogd, WRPS  
Environmental Portal  
RAES Tracking: Lines 17-52 and 17-53; EU 204 & 1391; NOC 904 & 1012; Resp. to  
IM# 9,497