



LB# 4268

AIR 15-116
NOC 947

STATE OF WASHINGTON
DEPARTMENT OF HEALTH

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

January 27, 2015

CERTIFIED MAIL

7011 2000 0002 2834 8624

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

Dear Mr. Smith:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your application to operate will be approved according to the enclosed emission unit specific license for:

Cleanup of Unplanned Radioactive Contamination at the Waste Treatment and Immobilization Plant (NOC 947; EU 1420)

The Washington State Department of Health (DOH) considers the conditions, controls, monitoring requirements, and limitations of the license integral to approval of your application.

This approval shall take effect, and a final approval letter issued, twenty-eight (28) days after you receive this letter, unless you apply for an adjudicative proceeding, as described below.

If you accept the conditions and limitations of this approval and do not wish to apply for an adjudicative proceeding, but wish to proceed under this approval before the 28 days have elapsed, please notify us in writing and the DOH will issue a final approval letter. Your notice should be mailed or faxed to:

DOH – Office of Radiation Protection
Radioactive Air Emissions Section
309 Bradley Blvd., Suite 201
Richland, Washington 98352
FAX: (509) 946-0876
Email: AIRRichland@doh.wa.gov




If there are concerns with the conditions and limitations of the approval, please notify the DOH. If attempts to resolve the concerns fail, the DOH will deny your application and you may contest the conditions and limitations of this approval, within 28 days of receipt, by filing the enclosed Request for Adjudicative Proceeding or a document providing substantially the same information with the DOH, Adjudicative Service Unit (ASU), in a manner that shows proof of service on the ASU. The ASU's address is:

DOH - Adjudicative Service Unit
310 Israel Road SE
P.O. Box 47879
Olympia, Washington 98504-7879

You must include a copy of this approval with your application. FILING SHALL NOT BE DEEMED COMPLETE UNTIL THE ADJUDICATIVE SERVICE UNIT ACTUALLY RECEIVES YOUR APPLICATION.

If you have any questions regarding this draft approval, please contact Mr. Thomas Frazier at (509) 946-0774.

Sincerely,



for P. John Martell, Manager
Radioactive Air Emissions Section

Enclosure(s): 1. Conditions and Limitations for EU 1420 (NOC 947)
2. Request for Adjudicative Proceedings

cc:	Ruth Allen, WRPS	Dale Jackson, USDOE-RL
	Matthew Barnett, PNNL	Jessica Joyner, WRPS
	Lucinda Borneman, WRPS	Reed Kaldor, MSA
	Lee Bostic, BNI	Paul Karschnia, CHPRC
	Dennis Bowser, USDOE-ORP	Ed MacAlister, USDOE-RL
	Cliff Clark, USDOE-RL	Valarie Peery, Ecology
	Jack Donnelly, WRPS	Maria Skorska, Ecology
	Rick Engelmann, CHPRC	Bryan Trimberger, USDOE-ORP
	Brad Erlandson, BNI	Randy Utley, WDOH
	Dennis Faulk, EPA	Jeff Voogd, WRPS
	Tom Frazier, WDOH	Joan Woolard, MSA
	Gary Fritz, MSA	Davis Zhen, EPA
	Phil Gent, Ecology	Environmental Portal
	Michael Greene, WRPS	RAES Tracking: Line# 1017; IM# 8,322
	Robert Haggard, BNI	

Emission Unit ID: 1420

200E

Unplanned Radioactive Contamination Cleanup @ WTP

This is a MINOR, FUGITIVE, non-point source emission unit.

WTP Diffuse and Fugitive

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
None	None		

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
WAC 246-247-075 [3]		As listed in condition 3 of this emission unit.	As listed in condition 5 of this emission unit.

Sampling Requirements As listed in the following Conditions and Limitations.

Additional Requirements

Additional monitoring or sampling requirements established by this License will be listed in the Conditions and Limitations section, if applicable.

Operational Status Diffuse and fugitive emission unit for as-needed cleanup of radioactively-contaminated debris.

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

Project Title	Approval #	Date Approved	NOC_ID
Cleanup of unplanned radioactive contamination at the Waste Treatment and Immobilization Plant		Not Approved	947

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 6.03E-05 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 6.03E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).
- 2) The process for this activity includes cleanup of radioactively-contaminated debris if found during routine radiological surveys. Action levels for implementation of this NOC include levels greater than or equal to 1000 dpm/100 cm² beta-gamma or 20 dpm/100 cm² alpha removable contamination. If action levels are equal to or greater than these limits, cleanup is necessary and implementation of the NOC will commence.

When this NOC is implemented, the following cleanup techniques will be used:

1. Non-coated concrete surfaces
 - a) Dry Rags
 - b) Scraping devices
 - c) Scrub brushes
 - d) Strippable coating
 - e) Wire brushes
 - f) High Efficiency Particulate Air (HEPA) vacuums

2. All other surfaces
 - a) Scraping devices
 - b) Damp wiping
 - c) Scrub brushes
 - d) Spray bottles with cleaning compound
 - e) Strippable coating
 - f) Wire brushes
 - a) High Efficiency Particulate Air (HEPA) vacuums
3. Soils and soil like surfaces with debris
 - a) Trowel/shovel
 - b) Scraping devices

3) **The Annual Possession Quantity is limited to the following radionuclides (Curies/year):**

Alpha - 0	4.78E-03	B/G - 0	5.81E-03
Alpha is assumed to be all Am-241. Other radionuclides may be encountered and are approved so long as they are conservatively represented by the total alpha and total beta-gamma constituents.		Beta/Gamma is assumed to be all Sr-90. Other radionuclides may be encountered and are approved so long as they are conservatively represented by the total alpha and total beta-gamma constituents.	

4) **ADMINISTRATIVE CONTROLS**

The following Administrative emission controls will be used during cleanup activities:

1. Strippable coatings or coverings may be applied to stabilize contamination.
2. Alpha and beta-gamma contamination surveys will be performed prior to and during cleanup activities. Glovebags or containments will be used when aggressive decontamination methods are implemented.
3. If HEPA vacuums are used, their operation will be conducted consistent with the Hanford Site W-PORTEX 007 HEPA Vacuum License (WDOH 2006) EU 1420
4. Liquids and damp wiping will be allowed on concrete to prevent transferring radionuclides into the building material; however, this technique may be used on coated floors and ducting. Glovebags or containments will be used for decontamination at levels greater than or equal to 1,000 dpm/100 cm² alpha or 50,000 dpm/100 cm² beta-gamma for removable contamination.
5. Removable contamination will be maintained less than 2,000 dpm/100cm² alpha or less than 50,000 dpm/100cm² beta-gamma on building and surfaces.
6. Contaminated debris will be collected and packaged in containers for disposal at an approved disposal facility. Radiological contamination and dose rate monitoring are conducted prior to transporting waste containers. Waste containers are managed consistent with applicable regulatory requirements.

5) **MONITORING**

Radiological monitoring will be performed in accordance with the latest revisions of the Waste Treatment Plant Radiological Control Manual (24590-WTP-MN-ESH-01-001), and the Radiological Routines procedure (24590-WTP-GPP-SRAD-021). Routine contamination surveys of contaminated areas will occur.

The following records and documentation will be kept.

- Radiological survey records and documentation will be kept.
- HEPA vacuum log, as needed
- Waste container log

Periodic air samples will be taken from the demolition area(s) of the area(s) with the highest potential exposure from the decontamination effort.

**STATE OF WASHINGTON
DEPARTMENT OF HEALTH
ENVIRONMENTAL HEALTH PROGRAMS
OFFICE OF RADIATION PROTECTION**

In Re The Approval of:
**Cleanup of Unplanned Radioactive
Contamination at the Waste Treatment and
Immobilization Plant**

Docket No:
REQUEST FOR ADJUDICATIVE PROCEEDING

NOC ID: 947
Approval No: AIR 15-116

THE STATE OF WASHINGTON TO:

**Mr. Kevin W. Smith, Manager
United States Department of Energy
Office of River Protection
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352-0450**

If you wish to request an adjudicative proceeding, you or your attorney must COMPLETE AND FILE THIS FORM OR A DOCUMENT PROVIDING SUBSTANTIALLY THE SAME INFORMATION WITH THE DEPARTMENT OF HEALTH ADJUDICATIVE SERVICE UNIT WITHIN TWENTY-EIGHT (28) DAYS OF YOUR RECEIPT of this Request for Adjudicative Proceeding form and a copy of the Office of Radiation Protection's approval, AIR 15-116.

You must file your application in a manner that shows proof of service on the Adjudicative Service Unit, at the following address:

Department of Health
Adjudicative Service Unit
310 Israel Road S.E.
P.O. Box 47879
Olympia, WA 98504-7879

With your application, you must include a copy of the Office of Radiation Protection's approval.

FILING SHALL NOT BE DEEMED COMPLETE UNTIL THE ADJUDICATIVE SERVICE UNIT ACTUALLY RECEIVES YOUR APPLICATION.

YOU HAVE THE RIGHT TO a formal hearing in this matter conducted pursuant to Revised Code of Washington (RCW) 43.70.115, Chapter 34.05 RCW, and Chapter 246-10 of the Washington Administrative Code (WAC). Alternatively, you may waive the formal hearing and submit a written statement and supporting documents setting out your position, your defenses, and any mitigating circumstances that you wish to bring to the Department's attention.

You have the right to be represented by an attorney at your own expense.

I.

I **WILL BE** represented by an attorney. His/her name, address, and phone number are:

Name:

Address:

Phone:

I **WILL NOT BE** represented by an attorney.

If after submitting this request, you obtain attorney representation or change attorneys, you must notify the Adjudicative Service Unit.

II.

I **DO NOT** waive my right to a formal hearing.

I **DO** waive my right to a formal hearing. I understand that if I waive my right to a formal hearing, the Department may decide this matter solely with reference to information in the Department's possession and to such written statements and supporting documents as I may have submitted.

If you choose to waive your right to a formal hearing, please complete the following:

I **AM NOT** submitting documents to the Department in support of my position.

I **AM** submitting a sworn statement and/or other documents to the Department in support of my position. Instructions - Please indicate your responses below:

If you are submitting documents to the Department, please list and briefly identify all such documents in the space provided below and on any additional sheet that may be necessary.

III.

ADMISSION/DENIAL OF CONDITIONS OR LIMITATIONS

The Office of Radiation Protection's approval AIR 15-116, dated January 27, 2015, contains conditions and limitations set out as numbered paragraphs. In the space below you must indicate, in good faith, whether you admit, or do not contest, or deny the conditions or limitations. Conditions or limitations denied or not contested may later be admitted. Conditions or limitations admitted or not contested shall be conclusively deemed true for further proceedings.

Instructions: I admit, deny, or do not contest the conditions or limitations as follows
(fill in the appropriate paragraph number):

	<u>Admit</u>	<u>Deny</u>	<u>Do Not Contest</u>
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]
Paragraph _____	[]	[]	[]

Please attach any additional sheets that may be necessary to respond to all allegations.

If you have chosen not to waive your rights to a formal hearing, please state all grounds for contesting this matter in the space provided below and on any additional sheets that may be necessary.

IV.

You have the right to an interpreter, appointed at no cost, if you are a hearing impaired person or limited English speaking person. If any witness for you is a hearing impaired person or a limited English speaking person, an interpreter will be appointed at your expense.

I **[DO]** / **[DO NOT]** (circle one) request an interpreter be appointed. If an interpreter is requested, please indicate the person or persons for whom an interpreter is required and their primary language, and/or whether they are hearing impaired.

IF YOU FAIL TO FILE YOUR APPLICATION IN A TIMELY MANNER, OR IF YOU FILE YOUR APPLICATION TIMELY BUT FAIL TO APPEAR AT ANY SCHEDULED SETTLEMENT CONFERENCE, PREHEARING CONFERENCE, OR HEARING WITHOUT LEAVE TO DO SO, THE DEPARTMENT MAY DECIDE THIS MATTER WITHOUT YOUR PARTICIPATION AND WITHOUT FURTHER NOTICE TO YOU.

DATED this _____ day of _____, _____

Party

Party's Representative (if any)

WSBA #: _____

