



IM# 8,763

**OFFICE OF RIVER PROTECTION**

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

**NOV 19 2015**

15-ECD-0056

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**  
**DEC -1 2015**  
WA Dept of Health  
Radioactive Air Emissions Section

Mr. Martell:

**U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITS THE LICENSE REVISION REQUEST FOR RELOCATION OF NEAR FIELD MONITORING STATION N581 NEAR THE LIQUID EFFLUENT RETENTION FACILITY IN THE HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01**

This letter submits for your review and approval the License/As Low As Reasonably Achievable Control Technology Revision Request for relocation of Near Field Monitoring Station N581 (Attachment 1). The As Low As Reasonably Achievable Control Technology revision request modifies licenses for five emission units contained in the Hanford Site Radioactive Air Emissions License Number FF-01, and the Hanford Site Air Operating Permit Number 00-05-006. The license revisions allow for near field monitoring station N581 to be relocated downwind from the Liquid Effluent Retention Facility basins outside of any radiological control zone, allowing the station to be included as part of the near field monitoring network. When the near field monitoring station is relocated, it will be given a new identification number; N582.

The Washington State Department of Ecology is copied on this transmittal. The Notification of Change Not Requiring Permit Revision form (Attachment 2) is needed by Washington State Department of Ecology to process the associated 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: (2)

cc: See page 2

Mr. John Martell  
15-ECD-0056

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NOV 19 2015

cc w/attachs:

P.M. Gent, Ecology  
R.A. Kaldor, MSA  
R.J. Utley, WDOH  
Environmental Portal, LMSI  
WRPS Correspondence

cc w/o attachs:

B.G. Erlandson, BNI  
J. Cox, CTUIR  
R.S. Skeen, CTUIR  
S.L. Dahl, Ecology  
D. Zhen, EPA (Region 10, Seattle)  
G. Bohnee, NPT  
K. Niles, Oregon Energy  
E.T. Faust, RL  
J.W. Schmidt, WDOH  
J.A. Joyner, WRPS  
R. Jim, YN

Attachment 1  
15-ECD-0056  
(2 Pages)

License/ALARACT Revision Request  
Relocation and Renumbering of Liquid Effluent Retention Facility  
Near Field Monitoring Station N581

  
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: 11/19/2015

License Revision

ALARACT Revision

WDOH Condition Number: Various

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

Report of Closure

#### PROJECT IDENTIFICATION

Project Title: Relocation and renumbering of Liquid Effluent Retention Facility near field monitoring station N581

Current WDOH NOC Number(s): 911, 912, 913, 905, 915

WDOH EU ID Number(s): 146, 147, 148, 301, 486. Also included is FF-01 Table 4-1.

Current WDOH Approval Letter Number(s): AIR 14-302, AIR 14-303, Air 14-304, AIR 14-305, 14-306

#### 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:

**Revision of EU 146 (NOC\_ID 911), 147 (NOC\_ID 912), and 148 (NOC\_ID 913) Sampling Requirements and Conditions 11, 12, and 14**

**Sampling Requirements: Per the sitewide ambient air monitoring program and section 5.0 of the FF-01 license, samples will be collected from the existing nNear- Field Environment Sampling facility and far-field monitoring stations.**

11) **DIFFUSE AND FUGITIVE OPERATIONS AUTHORIZED.**

This NOC is authorized to incorporate the most current version of NOC 945 [WDOH to insert new NOC\_ID #], EU 486 Diffuse and Fugitive Operations at LERF and ETF.  
(WAC 246-247-040(5))

Basis: The EU 486 NOC\_ID # will change.

12) **CONTINUOUS MONITORING- Ambient Air Monitoring Network**

The 200 Area near-facility ambient air monitoring network shall be used for continuous monitoring. The ~~s~~Stations (N498, N499, N582, N972, N999) will also provide indication of potential elevated airborne radioactivity. In addition, ~~continuous monitoring will be performed at the northeast corner of basin 44 (station N581) using the same frequency and protocol of the Hanford Site Near Facility Environmental Monitoring Program.~~  
(WAC 246-247-040(5))

Basis for revision: The near field monitoring station is being relocated outside of the contamination area and being renumbered from N581 to N582.

~~14) CONTINUOUS MONITORING Chain of custody~~

~~Air sample data will be analyzed by MSA and ABCASH data shall be available to WDOH. The chain of custody for station N581 shall be the same as for the 200 Area near facility ambient air monitoring network.~~

~~(WAC 246-247-040(5))~~

Basis for deletion: Chain of custody for near field monitoring is addressed by Section 5.1.4 under method 114 in the FF-01

**Revision of EU 301 (NOC\_ID 911) Condition 5**

5) DIFFUSE AND FUGITIVE OPERATIONS AUTHORIZED.

This NOC is authorized to incorporate the most current version of NOC 915 [WDOH to insert new NOC ID #], EU 486 Diffuse and Fugitive Operations at LERF and ETF.

(WAC 246-247-040(5))

Basis: The EU 486 NOC\_ID # will change.

**Revision of EU 486 (NOC\_ID 915) Condition 5**

5) MONITORING- Near Field

~~The activity-based monitoring at the northeast corner station shall transition to the near facility monitoring QA program as identified in FF-01 Section 5.1. The 200 Area near-facility ambient air monitoring network shall be used for continuous monitoring. The ~~s~~Stations (N498, N499, N582, N972, N999) will also provide indication of potential elevated airborne radioactivity. In addition, ~~continuous monitoring will be performed at the northeast corner of Basin 44 (station N581) using the same frequency and protocol of the Hanford Site Near Facility Environmental Monitoring Program.~~~~

~~(WAC 246-247-040(5))~~

Basis for revision: Consistency with revisions for EUs 146, 147, and 148.

**Revision of Table 4-1**

Add "\*N582" to the list of stations in the 200 East Area

**SIGNATURE**

Licensee Name: Department of Energy, Office of River Protection

Licensee Title: Emission Unit IDs 146, 147, 148, 301, and 486. Also Table 4-1

Licensee

Signature: 

Date: 11/19/15

Attachment 2  
15-ECD-0056  
(1 Page)

Notification of Change Not Requiring Permit Revision  
Section 502(2)(10) Change

  
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>
Relocation of near field monitoring station N581 near the Liquid Effluent Retention Facility, renumbering station to N582, and adding station to FF-01 Table 4-1.
<b>Date of change:</b>
The date of change is the submittal date of the letter.
<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>
Conditions will be revised associated with emission Units 146, 147, 148, 301, and 486.

\* 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.