

**Decon Trailers TRU Waste Retrieval (Dif/Fug)  
USDOE – Hanford Site  
Richland WA  
License: FF-01  
(EUs 1462 NOC 1069)**

**Licensing File**

**Table of Contents**

- 1) Licensing Checklist
- 2) Other Applicable Documentation (Emails, reports, calculations, etc.)
- 3) Informal Draft EU License
  - a) Licensee Comments on Informal Draft
  - b) Resolution of Comments
- 4) 28 Day Draft
  - a) Licensee Acceptance
  - b) RAES response and explanation of city notification time requirement
- 5) Final License

**1**

**LICENSING CHECKLIST**  
(Rev..2)

one to one

previous: En 484  
NOC 851

New: En 1462  
NOC 1069

Please initial boxes, as appropriate, rather than placing a check mark in the box

- RAES date received N/A and ~~DM#~~ assigned LO # 4751.
- Entered into RAES Tracking/RDIT 16-190. Completeness Review due N/A.
- To HP3 (responsible for facility) for assignment: JWS
- To assigned HP2: TPF
- Add draft Table of Contents and separator pages to file.
- Conduct completeness review using "Completeness Review Checklist" and draft "Completeness Notification" letter **within 20 days** of RAES date received. Discuss any concerns/issues with HP3 during this 20 day period.
- 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 old from AOP for printing purposes).
- 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.)
- HP3 - work with HP2 to resolve any comments then forward license file and draft "Completeness Determination" letter to HSC for review.
- 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: X (See next step, immediately.)
- 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/RDIT upon transmittal and will notify you of 20-Day Comment Due Date, below, upon returning the file to you).
  - USDOE-RL 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 licenses or renewals only*; we do not issue them for modifications.

20-Day Comment Due Date: J

(see page 2)

Within 40 days 4 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 4 JWS

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'.*

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.

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).

Upon licensee receipt of 28-day draft, <sup>2/12</sup> HSC will update RAES Tracking/RDIT, verify database concurrence, and return license file to HP2 with due date for licensee response or final issuance of license.

Final Due Date: 1/9/17

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

HSC finalizes:

- Add final letter(s)
- Update RAES Tracking/RDIT
- Verify database concurrence
- Update Licensee List
- Add final file to database 'inbox' to be entered/scanned

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- o EU 486 200 area Diffuse and Fugitive New NOC 1067 (Line 16-186)

NOC810 WRAP Combine into NOC 847 consolidation Close NOC 810 for EU 486  
 NOC 838 Roof Replacement Central Plateau- Combine into NOC 847 consolidation  
 NOC 847 Stabilization activities, Central Plateau-Core NOC other NOC added for  
 consolidation New NOC 1067

Frazier:

Highlighted items are being worked on by Ernest.

*All through showing*

- \*o NOC 848 Operation of the Integrated Disposal Facility – New EU 1464 NOC 1068 working on draft (Line ???) *- Reed - In Fr.*
- \*o NOC 849 Cleaning Radiologically Contaminated Vehicles –New EU 1464 New NOC 1068 working on draft. (Line ???) *- Reed - In Fr.*
- o NOC 851 Decontamination Trailer at the Transuranic Waste Retrieval Project EU 1243-1244 486 EU 486 needs to be issued. – *Showing to RAVEN - Frank - In Fr.*

Final License issued for EU 1243 and 1244 9/12/2016 – New EU for 486 need to draft conditions. (Line 16-140)

*License file Draft Conditions*

- o NOC 830 Consolidated T Plant Operations- Reissue EU 314 for T-Plant Operations New NOC 1041. Need closure paperwork for EU 486 from USDOE (Line ???) *- Frank - In Fr.*

NOC 830 EU 447 will be captured under Core PTRAEU NOC 837 (Ernest see above)

*Start in*

NOC 810 WRAP EU 193 486 1183 Draft new NOCs for EU 193 and 1183. *1 to 1 closure - Need to start*

NOC 810 EU 486 activities for WRAP to be moved into new 486 NOC (Ernest see above)

*In fixed comment form 10-20 2 mo submit to schmitt or 25 day.*

- o NOC 804 Operation of the TRU waste retrieval 455 486 755 (NOC 1035) 756 (1036) 1181 (1038) 1322 (NOC 1037) 1326 (NOC 1039) 1327 (NOC 1040) – New EU 1440 NOC 1042 TRU for EU 486 close EU 486 out of NOC 804 Draft Informal License sent to DOE for comment. (Lines 16 148 thru 153 and 191) *- Get comment from Frank*

NOC 804 EU 455 activities will be captured under HEPA Vac NOC (Ernest see above).

Laws:

Drafting conditions for the following:  
 Pretreatment Facility (PT or PTF)

1. NOC 1062 PT-S4 (EU 543) RFD/PJM PJV Exhaust System

One to One Status:

Persons with no One to One Responsibilities: Ben Conroy, Crystal Mathey, Dan Beers

McCormick:

- NOC 838 Roof Replacement 447 455 476 486 See EUs Below
  
- *EU 447 PTREAU*  
  
NOC 830 Consolidated T Plant Operations = Combine into NOC 837 as necessary Close NOC 830 for EU 447  
**NOC 837 PTREAU –Keep as core NOC**  
NOC 838 Roof Replacement, Central Plateau- Combine into NOC 837 as necessary close NOC 838
  
- *EU 455 HEPA VAC*  
  
NOC 663 HEPA Filtered Vacuum Radioactive Air Emission Units- Keep as core NOC  
NOC 804 Operation of the Transuranic Waste Retrieval Project- Combine into NOC 663 as necessary Close NOC 804 for EU 455  
NOC 838 Roof Replacement, Central Plateau- Combine into NOC 663 as necessary close NOC 838 for EU 445
  
- *EU 476 Guzzler New NOC Tank Farms 1064 New EU1449 New NOC Site Wide 1072 EU 476 (Line ???)*  
  
NOC 774 Guzzler in tank farm facilities-New EU 1449, NOC 1064 close out of EU 486.  
NOC 838 Roof Replacement Central Plateau-Obsolete- Combine into NOC 860 close NOC 838 for EU 774  
**NOC 860 Guzzler on Hanford Site - Keep as core NOC New NOC 1072**
  
- Tank Farms (Waiting on revision paperwork)
  - AN Tank Farm – 735, (NOC 1022) and 736 (NOC 1025) (Line 16-154 and 155)
  - AW Tank Farm – 855 (NOC 1026) and 856 (NOC 1027) (Line 16-156 and 157)
  - AP Tank Farm – 1328 (NOC 1328) and 1329 (NOC 1029) (Line 16-158 and 159)
  - SY Tank Farm – 1335 (NOC 1030) and 1342(NOC 1031) (Line 16-160 and 161)

2. NOC 1061 PT-S3 (EU 534) PVP/PVV Exhaust System
3. NOC 1060 PT-S2 (EU 546) C5V Exhaust System
4. NOC 1059 PT-S1 (EU 545) C3V Exhaust System
5. NOC 1058 PT-C2 (EU 544) C2V Exhaust System

Low Activity Waste Facility (LAW)

6. NOC 1057 LV-S3 (EU 547) Combined Melter Offgas/Vessel Vent Exhaust System
7. NOC 1056 LV-S2 (EU 550) C5V Exhaust System
8. NOC 1055 LV-S1 (EU 549) C3V Exhaust System
9. NOC 1054 LV-C2 (EU 548) C2V Exhaust System

High Level Waste Facility (HLW)

10. NOC 1053 HV-S4 (EU 552) RFD/PJM PJV Exhaust System
11. NOC 1052 HV-S3a (EU 551) Melter 1 Offgas/Vessel Vent Exhaust System
12. NOC 1051 HV-S3b (EU 753) Melter 2 Offgas/Vessel Vent Exhaust System
13. NOC 1050 HV-S2 (EU 555) C5V Exhaust System
14. NOC 1049 HV-S1 (EU 554) C3V Exhaust System
15. NOC 1048HV-C2 (EU 553) C2V Exhaust System
16. NOC 1047 IHLW-S1 (EU 754) IHLW Canister Ventilation Exhaust System

Laboratory Facility (LAB) a.k.a. Analytical Radiological Laboratory (ARL)

17. NOC 1046 LB-S2 (EU 559) C5V Exhaust System
18. NOC 1045 LB-S1 (EU 558) C3V Exhaust System
19. NOC 1044LB-C2 (EU 557) C2V Exhaust System

**Completed Items:**

Final License issued for EU 472 and 473 (Trench 31 and 34) on 9/12/2016 Frazier

Final License issued for EU 1243 and 1244 (TRU Decon Trailers) on 9/12/2016 Frazier Still need to issue a new EU to cover EU 486.



## **Frazier, Thomas (DOH)**

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**From:** McCormick, Ernest R (DOH)  
**Sent:** Friday, October 14, 2016 11:26 AM  
**To:** Frazier, Thomas (DOH)  
**Cc:** Utley, Randell J (DOH)  
**Subject:** New EU numbers.

Tom

I generated New EU and NOC as listed below.

AEI Number: 200 Area Diffuse/Fugitive - TRU Retrieval (currently NOC (804) EU 1440 TRU Waste Retrieval Diffuse and Fugitive Operation (Replaces NOC 804)

AEI Number: 200 Area Diffuse/Fugitive - IDF (currently NOC 713) Plant ID 277 Integrated Disposal Facility (IDF) EU 1464 Integrated Disposal Facility (IDF) NOC 1068

AEI Number: 200 Area Diffuse/Fugitive - Cleaning Rad Contaminated Vehicles (currently NOC 849)  
TRU Decon Trailers Plant ID 1 Miscellaneous Support Facilities EU 1462 Decon Trailers TRU Waste Retrieval (Diff/Fug) (note plural on trailers) NOC 1069

Need AEI\_ID similar to EU 1243 Decon Trailer TRU Waste Retrieval (Intermit. Op.) 200 W-TRUDECON-001

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**From:** Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]  
**Sent:** Thursday, October 13, 2016 9:08 AM  
**To:** Kaldor, Reed A <[Reed\\_A\\_Kaldor@rl.gov](mailto:Reed_A_Kaldor@rl.gov)>  
**Cc:** Faust, Eric T <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)>; Carleo, Frank J <[Frank\\_J\\_Carleo@rl.gov](mailto:Frank_J_Carleo@rl.gov)>; Frazier, Thomas DOH <[thomas.frazier@doh.wa.gov](mailto:thomas.frazier@doh.wa.gov)>  
**Subject:** Re: AEI Numbers

Thank you...I think they are the only thing Tom is waiting on for TRU retrieval

Sent from my iPhone.

On Oct 12, 2016, at 4:33 PM, Kaldor, Reed A <[Reed\\_A\\_Kaldor@rl.gov](mailto:Reed_A_Kaldor@rl.gov)> wrote:

Yes, I started working on them. I should be able to have them to Tom tomorrow morning.

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**From:** Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]  
**Sent:** Wednesday, October 12, 2016 3:05 PM  
**To:** Kaldor, Reed A <[Reed\\_A\\_Kaldor@rl.gov](mailto:Reed_A_Kaldor@rl.gov)>  
**Cc:** Faust, Eric T <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)>; Carleo, Frank J <[Frank\\_J\\_Carleo@rl.gov](mailto:Frank_J_Carleo@rl.gov)>; Frazier, Thomas DOH <[thomas.frazier@doh.wa.gov](mailto:thomas.frazier@doh.wa.gov)>  
**Subject:** RE: AEI Numbers

I missed coping Tom ☺

**From:** Schmidt, John W (DOH)  
**Sent:** Wednesday, October 12, 2016 3:03 PM

**To:** 'Kaldor, Reed A' <[Reed\\_A\\_Kaldor@rl.gov](mailto:Reed_A_Kaldor@rl.gov)>

**Cc:** 'Faust, Eric T' <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)>; 'Carleo, Frank J' <[Frank\\_J\\_Carleo@rl.gov](mailto:Frank_J_Carleo@rl.gov)>

**Subject:** AEI Numbers

Reed,

Did you make any progress on the AEI numbers. Tom is close to issuing the TRU Retrieval Licenses and needs the AEI for the EU 486 D/F replacement. Thanks

**Frazier, Thomas (DOH)**

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**From:** Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov>  
**Sent:** Thursday, October 13, 2016 10:31 AM  
**To:** Frazier, Thomas (DOH)  
**Cc:** Faust, Eric T; Carleo, Frank J; Schmidt, John W (DOH); Homan, Nancy A; Fritz, Gary  
**Subject:** RE: AEI Numbers

Tom -

As mentioned on the phone, we already have AEI numbers in our database for these units/NOCs. We want to retain the current nomenclature. As such, here are the AEI numbers for you to use.

AEI Number: 200 Area Diffuse/Fugitive - TRU Retrieval (currently NOC 804) ✓  
AEI Number: 200 Area Diffuse/Fugitive - IDF (currently NOC 713) ✓  
AEI Number: 200 Area Diffuse/Fugitive - Cleaning Rad Contaminated Vehicles (currently NOC 849) ✓

Let me know if you need any additional information.

Reed

*→ Reed for  
Decontamination unit  
like an AFE AFE  
number like this*

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**From:** Schmidt, John W (DOH) [mailto:John.Schmidt@DOH.WA.GOV]  
**Sent:** Thursday, October 13, 2016 9:08 AM  
**To:** Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov>  
**Cc:** Faust, Eric T <Eric.Faust@rl.doe.gov>; Carleo, Frank J <Frank\_J\_Carleo@rl.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>  
**Subject:** Re: AEI Numbers

*200 W-TRU ECO cases*

*mount of  
decont  
workers*

Thank you...I think they are the only thing Tom is waiting on for TRU retrieval

Sent from my iPhone

On Oct 12, 2016, at 4:33 PM, Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov> wrote:

Yes, I started working on them. I should be able to have them to Tom tomorrow morning.

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**From:** Schmidt, John W (DOH) [mailto:John.Schmidt@DOH.WA.GOV]  
**Sent:** Wednesday, October 12, 2016 3:05 PM  
**To:** Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov>  
**Cc:** Faust, Eric T <Eric.Faust@rl.doe.gov>; Carleo, Frank J <Frank\_J\_Carleo@rl.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>  
**Subject:** RE: AEI Numbers

I missed coping Tom ☺

**From:** Schmidt, John W (DOH)  
**Sent:** Wednesday, October 12, 2016 3:03 PM  
**To:** 'Kaldor, Reed A' <Reed\_A\_Kaldor@rl.gov>

Cc: 'Faust, Eric T' <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)>; 'Carleo, Frank J' <[Frank.J.Carleo@rl.gov](mailto:Frank.J.Carleo@rl.gov)>  
Subject: AEI Numbers

Reed,

Did you make any progress on the AEI numbers. Tom is close to issuing the TRU Retrieval Licenses and needs the AEI for the EU 486 D/F replacement. Thanks

## **Frazier, Thomas (DOH)**

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**From:** Schmidt, John W (DOH)  
**Sent:** Tuesday, October 11, 2016 7:27 AM  
**To:** Frazier, Thomas (DOH); McCormick, Ernest R (DOH); Utley, Randell J (DOH); Sanders, Cassandra N (DOH); Laws, Gail L (DOH)  
**Cc:** Martell, P John (DOH); Berven, Shawna D (DOH)  
**Subject:** 1 to 1.Status

Just so we are all on the same page. If you have updated information, please send to all.

Please send any informal or formal drafts to me (tank farm/WTP to Randy) before you send them out. We have been catching errors in PTE, Abated doses, and APQ/Release Rates. I hope this eliminates some of the rework we are doing on this.

Thanks

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016, this means we need to have final 28 day drafts by end of November.

NOC 830 Consolidated T-Plant Operations **The EU 486 portion is complete and a closure form will be submitted.** Tom F

NOC 804 TRU Waste Retrieval - **Will be issued with a new EU for the D/F Tom F**

NOC 849 Cleaning of Radiologically Contaminated Vehicles. **Issue with a new EU for the D/F Tom F**

NOC 851 Decontamination Trailer at the TRU Project. **Will be issued with a new EU for the D/F Tom F**

NOC 848 Operation of IDF - **Will be issued with a new EU.** Tom F

NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization **Will all be issued under EU 486** Ernest M and Casandra S

**Ernest, Tom will need you to help set-up the new EUs for each of his project**

Here is a new break out of the list and a status:

EU with Multiple NOC Approvals (RED IS PRIMARY NOC)

447 PTRAEU 837 830 838 Cassandra

455 HEPA Vac 663 804 838 Cassandra

476 Guzzler 860 774 838 Cassandra

486 200 Area D/F 849 848 847 **810** 838 Ernest Informal draft sent to DOE

NOC with Multiple EUs

851 TRU Decon Trailers 1243 1244 486 **Tom F** Final License issued for EU 1243 and 1244 9/12/2016 New EU to replace 486 being drafted.

838 Roof Replacement 447 455 476 486 Ernest/Cassandra

~~834 Trench 31 and 34 472 473 Tom~~ Final License issued 9/12/2016 **Complete**

830 T Plant 314 447 486 **Tom F** EU 486 will be removed from the License Activity is Complete. Awaiting closure form from DOE.

818 AP Vent Upgrade 1328 1329 **Randy**

817 TF Vent. Upgrade 1335 1342 **Randy**

**810** WRAP 193 486 1183 Tom F

809 AN AW 735 736 855 856 **Randy** Modification on its way

804 TRU retrieval 455 486 755 756 1181 1322 1326 1327 Tom F Drafting informal licenses new EU will capture D/F of EU486. EU 455 will be captured by Ernest and Cassandra.

628 WTP Gail Laws Working with BHI and drafting licenses  
627 WTP Gail Laws Working with BHI and drafting licenses  
626 WTP Gail Laws Working with BHI and drafting licenses  
625 WTP Gail Laws Working with BHI and drafting licenses

**Frazier, Thomas (DOH)**

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**From:** Schmidt, John W (DOH)  
**Sent:** Wednesday, October 05, 2016 7:53 AM  
**To:** Frazier, Thomas (DOH)  
**Cc:** Berven, Shawna D (DOH); McCormick, Ernest R (DOH); Utley, Randell J (DOH)  
**Subject:** FW: Verification Needed  
**Attachments:** Notes from our EU 486 1 to 1 Meeting

Tom,

I need you to start a file to get the new EU for the D/F of NOC 851 Decontamination Trailer at the TRU Project (old was 486) out. I also need you to start the replacement EU License for the following D/F for EU 486 for the following:

- NOC 804 TRU Waste Retrieval - **Will be issued with a new EU for the D/F** I think you are in the process of sending them an informal draft
- NOC 849 Cleaning of Radiologically Contaminated Vehicles. **Research if it can be closed or will be issued with a new EU for the D/F** Work with Reed K
- NOC 848 Operation of IDF - **Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged.** Work with Frank (Tad when he returns)

Ernest should have made new EUs for you for these 4. Please let Shawna and me know what the EU numbers are so we can track the progress.

Thank you for all your hard work...with the holidays approaching, we will need to step these up to get them out in time to meet the December 30 deadline.

John

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**From:** Schmidt, John W (DOH)  
**Sent:** Monday, October 03, 2016 7:40 AM  
**To:** McCormick, Ernest R (DOH) <Ernest.McCormick@DOH.WA.GOV>; Berven, Shawna D (DOH) <Shawna.Berven@DOH.WA.GOV>; Utley, Randell J (DOH) <Randell.Utley@DOH.WA.GOV>  
**Cc:** Frazier, Thomas (DOH) <Thomas.Frazier@DOH.WA.GOV>  
**Subject:** RE: Verification Needed

We all discussed this over two weeks ago. Please read the attached email.

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**From:** McCormick, Ernest R (DOH)  
**Sent:** Friday, September 30, 2016 2:12 PM  
**To:** Berven, Shawna D (DOH) <Shawna.Berven@DOH.WA.GOV>; Schmidt, John W (DOH) <John.Schmidt@DOH.WA.GOV>; Utley, Randell J (DOH) <Randell.Utley@DOH.WA.GOV>  
**Cc:** Frazier, Thomas (DOH) <Thomas.Frazier@DOH.WA.GOV>  
**Subject:** RE: Verification Needed

Shawna

As far as I know there has been no discussion of closing NOC 851 Decon Trailer and EU 486. This should fall under the consolidated central plateau diffuse and fugitive that will retain the NOC 486 but we need to include it in the discussion. It should be deleted once we have the consolidated central plateau diffuse/fugitive in place. Check on my weekly update for a listing of where each NOC should stand.

Ernest

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**From:** Berven, Shawna D (DOH)  
**Sent:** Friday, September 30, 2016 12:48 PM  
**To:** Schmidt, John W (DOH); Utley, Randell J (DOH)  
**Cc:** Frazier, Thomas (DOH); McCormick, Ernest R (DOH)  
**Subject:** Verification Needed

NOC 851 had 3 EUs associated with it (1243, 1244, and 486) before Tom did the one-to-one update.

The two letters we sent involved 1243 and 1244...assigning them both new NOCs.

Schmidt and I went in and obsoleted the two EUs from NOC 851, but we did NOT obsolete the entire NOC. Someone else must have gone in and done that.

As far as I can tell, NOC 851 should still be associated with EU 486...but I don't want to change anything until I get clarification.

Also, no notification was sent to DOE stating that NOC 851 was being removed from EU 486...at least, not that I am aware of.



**Frazier, Thomas (DOH)**

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**From:** Schmidt, John W (DOH)  
**Sent:** Wednesday, September 14, 2016 3:27 PM  
**To:** Kaldor, Reed A  
**Cc:** Frazier, Thomas (DOH); Faust, Eric T; Marple, Candice E  
**Subject:** Re: Notes from our EU 486 1 to 1 Meeting

Reed,

Who should Tom work with on getting this reissued?

Sent from my iPhone

On Sep 14, 2016, at 2:59 PM, Kaldor, Reed A <[Reed\\_A\\_Kaldor@rl.gov](mailto:Reed_A_Kaldor@rl.gov)> wrote:

John -

I contacted our crane and rigging organization and they would like to keep this NOC open and available for use. Let me know if you need any more information. Thanks.

Reed

**From:** Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]  
**Sent:** Tuesday, September 13, 2016 8:36 AM  
**To:** Carleo, Frank J <[Frank\\_J\\_Carleo@rl.gov](mailto:Frank_J_Carleo@rl.gov)>; Faust, Eric T <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)>; Kaldor, Reed A <[Reed\\_A\\_Kaldor@rl.gov](mailto:Reed_A_Kaldor@rl.gov)>  
**Cc:** Utley, Randell <[Randell.Utley@doh.wa.gov](mailto:Randell.Utley@doh.wa.gov)>; Sanders, Cassandra N (DOH) <[cassandra.sanders@doh.wa.gov](mailto:cassandra.sanders@doh.wa.gov)>; McCann, Susette L (DOH) <[susette.mccann@doh.wa.gov](mailto:susette.mccann@doh.wa.gov)>; Frazier, Thomas DOH <[thomas.frazier@doh.wa.gov](mailto:thomas.frazier@doh.wa.gov)>; Berven, Shawna <[Shawna.Berven@doh.wa.gov](mailto:Shawna.Berven@doh.wa.gov)>  
**Subject:** Notes from our EU 486 1 to 1 Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

NOC 830 Consolidated T-Plant Operations The EU 486 portion is complete and a closure form will be submitted. Tom F

NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F Tom F

NOC 849 Cleaning of Radiologically Contaminated Vehicles. Research if it can be closed or will be issued with a new EU for the D/F Tom F

NOC 851 Decontamination Trailer at the TRU Project - Will be issued with a new EU for the D/F Tom F

NOC 848 Operation of IDF - Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Tom F

NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S

Ernest, Tom will need you to help set-up the new EUs for each of his projects.

**Please let me know if you have any comments or questions.**

**Frazier, Thomas (DOH)**

---

**From:** Schmidt, John W (DOH)  
**Sent:** Wednesday, September 14, 2016 3:22 PM  
**To:** Faust, Eric T  
**Cc:** Utley, Randell J (DOH); Sanders, Cassandra N (DOH); McCann, Susette L (DOH); Frazier, Thomas (DOH); Berven, Shawna D (DOH); Carleo, Frank J; Kaldor, Reed A; Karschnia, Paul T; Engelmann, Richard H; Bowser, Dennis W; Trimberger, Bryan R  
**Subject:** Re: Notes from our EU 486 1 to 1 Meeting

Thank you. Tom F will be working with Frank to get it reissued.

Sent from my iPhone

On Sep 14, 2016, at 11:17 AM, Faust, Eric T <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)> wrote:

John,

It would be best for DOE to keep NOC 848 / Operation of the IDF as a separate emission unit that retains the ability to operate. The IDF is currently a RCRA permitted facility and needs to maintain the capability of receiving waste. If we move it to an approval to construct, this would burden DOE to re-permit the facility to operate at a later date.

If you have any questions, please contact me on 376-9607.

Thanks,  
Eric

**From:** Schmidt, John W (DOH) [<mailto:John.Schmidt@DOH.WA.GOV>]  
**Sent:** Tuesday, September 13, 2016 8:36 AM  
**To:** Carleo, Frank J <[Frank.J.Carleo@rl.gov](mailto:Frank.J.Carleo@rl.gov)>; Faust, Eric T <[Eric.Faust@rl.doe.gov](mailto:Eric.Faust@rl.doe.gov)>; Kaldor, Reed A <[Reed.A.Kaldor@rl.gov](mailto:Reed.A.Kaldor@rl.gov)>  
**Cc:** Utley, Randell <[Randell.Utley@doh.wa.gov](mailto:Randell.Utley@doh.wa.gov)>; Sanders, Cassandra N (DOH) <[cassandra.sanders@doh.wa.gov](mailto:cassandra.sanders@doh.wa.gov)>; McCann, Susette L (DOH) <[susette.mccann@doh.wa.gov](mailto:susette.mccann@doh.wa.gov)>; Frazier, Thomas DOH <[thomas.frazier@doh.wa.gov](mailto:thomas.frazier@doh.wa.gov)>; Berven, Shawna <[Shawna.Berven@doh.wa.gov](mailto:Shawna.Berven@doh.wa.gov)>  
**Subject:** Notes from our EU 486 1 to 1 Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

**NOC 830 Consolidated T-Plant Operations The EU 486 portion is complete and a closure form will be submitted. Tom F**

**NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F Tom F**

**NOC 849 Cleaning of Radiologically Contaminated Vehicles. Research if it can be closed or will be issued with a new EU for the D/F Tom F**

**NOC 851 Decontamination Trailer at the TRU Project. Will be issued with a new EU for the D/F Tom F**

**NOC 848 Operation of IDF - Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Tom F**

**NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S**

**Ernest, Tom will need you to help set-up the new EUs for each of his projects.**

**Please let me know if you have any comments or questions.**

**Frazier, Thomas (DOH)**

---

**From:** Schmidt, John W (DOH)  
**Sent:** Tuesday, September 13, 2016 8:36 AM  
**To:** Carleo, Frank J; Faust, Eric T; Kaldor, Reed A  
**Cc:** Utley, Randell J (DOH); Sanders, Cassandra N (DOH); McCann, Susette L (DOH); Frazier, Thomas (DOH); Berven, Shawna D (DOH)  
**Subject:** Notes from our EU 486 1 to 1 Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

NOC 830 Consolidated T-Plant Operations **The EU 486 portion is complete and a closure form will be submitted. Tom F**  
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NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization **Will all be issued under EU 486 Ernest M and Casandra S**

**Ernest, Tom will need you to help set-up the new EUs for each of his projects.**

**Please let me know if you have any comments or questions.**

**Frazier, Thomas (DOH)**

**From:** Schmidt, John W (DOH)  
**Sent:** Wednesday, September 14, 2016 3:27 PM  
**To:** Kaldor, Reed A  
**Cc:** Frazier, Thomas (DOH); Faust, Eric T; Marple, Candice E  
**Subject:** Re: Notes from our EU 486 1 to 1 Meeting

Reed,

Who should Tom work with on getting this reissued?

Sent from my iPhone

On Sep 14, 2016, at 2:59 PM, Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov> wrote:

John -

I contacted our crane and rigging organization and they would like to keep this NOC open and available for use. Let me know if you need any more information. Thanks.

Reed

---

**From:** Schmidt, John W (DOH) [mailto:John.Schmidt@DOH.WA.GOV]  
**Sent:** Tuesday, September 13, 2016 8:36 AM  
**To:** Carleo, Frank J <Frank\_J\_Carleo@rl.gov>; Faust, Eric T <Eric.Faust@rl.doe.gov>; Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov>  
**Cc:** Utley, Randell <Randell.Utley@doh.wa.gov>; Sanders, Cassandra N (DOH) <cassandra.sanders@doh.wa.gov>; McCann, Susette L (DOH) <susette.mccann@doh.wa.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>; Berven, Shawna <Shawna.Berven@doh.wa.gov>  
**Subject:** Notes from our EU 486 1 to 1 Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

*→ 119*  
~~NOC 830 Consolidated T-Plant Operations. The EU 486 portion is complete and a closure form will be submitted. Tom F~~

~~NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F Tom F~~

~~NOC 849 Cleaning of Radiologically Contaminated Vehicles - Research if it can be closed or will be issued with a new EU for the D/F Tom F~~

~~NOC 851 Decontamination Trailer at the TRU Project. Will be issued with a new EU for the D/F Tom F~~

~~NOC 848 Operation of IDF. Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Tom F~~

NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S

Ernest, Tom will need you to help set-up the new EUs for each of his projects.

**Please let me know if you have any comments or questions.**

**Frazier, Thomas (DOH)**

**From:** Schmidt, John W (DOH)  
**Sent:** Tuesday, September 13, 2016 8:36 AM  
**To:** Carleo, Frank J; Faust, Eric T; Kaldor, Reed A  
**Cc:** Utley, Randell J (DOH); Sanders, Cassandra N (DOH); McCann, Susette L (DOH); Frazier, Thomas (DOH); Berven, Shawna D (DOH)  
**Subject:** Notes from our EU 486 1. to I. Meeting

Please make corrections if you have a different understanding:

The following is the current path forward for the NOCs currently issued under EU 486. Project must be completed before 12/31/2016.

- NOC 830 Consolidated T-Plant Operations The EU 486 portion is complete and a closure form will be submitted. Tom F
- NOC 804 TRU Waste Retrieval - Will be issued with a new EU for the D/F Tom F → Plant - EU-1440
- NOC 849 Cleaning of Radiologically Contaminated Vehicles. Research if it can be closed or will be issued with a new EU for the D/F Tom F →
- NOC 851 Decontamination Trailer at the TRU Project. Will be issued with a new EU for the D/F Tom F
- NOC 848 Operation of IDF - Will be issued with a new EU for the D/F or a revision form will be submitted to move it to an approval to construct. A meeting with ORP will need to be arranged. Tom F
- NOC 810 WRAP, NOC 838 Roof Replacement, NOC 847 Characterization Stabilization Will all be issued under EU 486 Ernest M and Casandra S

Ernest, Tom will need you to help set-up the new EUs for each of his projects.

Please let me know if you have any comments or questions.

NOC 849 ~~Rest~~ cleaning of Radiological Contaminated Vehicles.  
↳ Car test? Will require creation of a new emission unit.

NOC 851 Decon trailers at the TRU Project - need ~~emission~~  
new emission unit!! need help !!! to create EU!

FB rule →  
out to guys!!!

Frank Carleo called  
Tom in next place but then



3

200

**Decon Trailers TRU Waste Retrieval (Diff/Fug)**

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

Miscellaneous Support Facilities

**Abatement Technology** NONE 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
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**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
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Sampling Requirements None

Additional Requirements

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

**Operational Status** This emission unit covers Diffuse and Fugitive emissions in (TRU) Decontamination trailers where contaminated material or individuals enters into the trailer when the active powered exhaust is not operational.

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

Project Title	Approval #	Date Approved	NOC_ID
Decon Trailers TRU Waste Retrieval (Diff/Fug) <sup>WHA SP</sup> Operation <sup>NOC</sup> (replaces 851)		Not Approved	1069

**Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)**

- 1) This emission unit does not have an abated PTE.
- 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.

All work will be performed in accordance with approved radiological control methods and as low as reasonably achievable (ALARA) program requirements. These requirements will be carried out through radiological control procedures.

The general physical processes associated with decontamination activities in the decontamination trailer will consist of the following:

- a) On identification of the need for additional decontamination of personnel, affected individuals will be escorted to the decontamination trailer.
- b) As appropriate, contaminated clothing, coverings, and/or articles will be removed, packaged, and dispositioned in accordance with applicable facility waste handling procedures.
- c) Personnel decontamination processes might include various methods or a combination of cleaning agents (e.g., soap and water, pre-moistened towelettes, shaving cream-type foam decontamination agents for facial areas, removal of hair, and abrasive soaps for toughened skin surfaces [e.g., hands and feet]).
- d) Spent decontamination solutions will be transferred from the holding tanks directly to a mobile disposal unit or containerized (e.g., packaged in absorbents in drums or placed

in drums or carboys) and transported to existing facilities on the Hanford Site for disposal.

Periodic maintenance inspections of the decontamination trailer will be performed without use of containment or portable exhausters.

- 3) This emission unit does not have a unabated PTE:

Am - 241	8.37E-04	Solid	WAC 246-247-030(21)(a)
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Alpha release rate based on Am-241. Any radionuclide might be present. Am-241 is representative of the alpha-emitting radionuclides present.

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Cs - 137	4.19E-03	Solid	WAC 246-247-030(21)(a)
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Beta/Gamma release rate based on Cs-137. CS-137 is representative of the Beta/gamma-emitting radionuclides present..

The radioactive isotopes identified for this emission unit are (no quantities specified):

Am - 241                      Cs - 137

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

- 4) Periodic Confirmatory Measurements (PCM) for the diffuse and fugitive emissions shall be provided by the established near facility monitoring and augmented by radiological surveys during personnel decontamination operations (e.g., smears and hand-held radiation monitoring measurements of the interior/exterior of the decontamination trailer). These methods are intended to demonstrate compliance by showing that while remaining under the contamination levels by which work is controlled, the actual emissions inherently will be below the emission estimates. *(Citation?)*
- 5) Emissions will be included in the overall fugitive and diffuse emission estimate for reporting purposes as part of the approved ambient air monitoring conducted at the Hanford Site perimeter. *(Citation?)*

Emission Unit ID: 1462

200

**Decon Trailers TRU Waste Retrieval (Diff/Fug)**

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

Miscellaneous Support Facilities

**Abatement Technology** NONE 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
--------------	----------------------	---------------------	------------------------

**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 246-247-040(5) & WAC 246-247-060(5)	Hanford Site Near-Facility Environmental Ambient Monitoring Program	Alpha/Beta/Gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations.

**Sampling Requirements** Radiological field surveys and near field monitoring

**Additional Requirements**

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

**Operational Status** This emission unit covers Diffuse and Fugitive emissions in Transuranic Decontamination trailers where contaminated material or individuals enters into the trailer when the active powered exhaust is not operational.

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

Project Title	Approval #	Date Approved	NOC_ID
Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (replaces NOC 851)		Not Approved	1069

**Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)**

- 1) This emission unit does not have an abated PTE.
- 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.

All work will be performed in accordance with approved radiological control methods and as low as reasonably achievable (ALARA) program requirements. These requirements will be carried out through radiological control procedures.

The general physical processes associated with decontamination activities in the decontamination trailer will consist of the following:

- a.) On identification of the need for additional decontamination of personnel, affected individuals will be escorted to the decontamination trailer.
- b.) As appropriate, contaminated clothing, coverings, and/or articles will be removed, packaged, and dispositioned in accordance with applicable facility waste handling procedures.
- c.) Personnel decontamination processes might include various methods or a combination of cleaning agents

(e.g., soap and water, pre-moistened towelettes, shaving cream-type foam decontamination agents for facial areas, removal of hair, and abrasive soaps for toughened skin surfaces [e.g., hands and feet]).

D.) Spent decontamination solutions will be transferred from the holding tanks directly to a mobile disposal unit or containerized (e.g., packaged in absorbents in drums or placed in drums or carboys) and transported to existing facilities on the Hanford Site for disposal.

Periodic maintenance inspections of the decontamination trailer will be performed without use of containment or portable exhausters.

- 3) This emission unit does not have a unabated PTE.

Am - 241	8.37E-04	Solid	WAC 246-247-030(21)(a)
Alpha release rate based on Am-241. Any radionuclide might be present. Am-241 is representative of the alpha-emitting radionuclides present.			

Cs - 137	4.19E-03	Solid	WAC 246-247-030(21)(a)
Beta/Gamma release rate based on Cs-137. CS-137 is representative of the Beta/gamma-emitting radionuclides present..			

The radioactive isotopes identified for this emission unit are (no quantities specified):

Am - 241                      Cs - 137

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

- 4) MONITORING-Near Field Monitoring and Radiological Surveys  
Periodic Confirmatory Measurements (PCM) for the diffuse and fugitive emissions shall be provided by the established near facility monitoring and augmented by radiological surveys during personnel decontamination operations (e.g., smears and hand-held radiation monitoring measurements of the interior/exterior of the decontamination trailer). These methods are intended to demonstrate compliance by showing that while remaining under the contamination levels by which work is controlled, the actual emissions inherently will be below the emission estimates. (WAC 246-247-040(5) , WAC 246-247-060(5) and WAC 246-247-075(4))
- 5) EMISSIONS-Included in Overall Fugitive and Diffuse Estimate  
Emissions will be included in the overall fugitive and diffuse emission estimate for reporting purposes as part of the approved ambient air monitoring conducted at the Hanford Site perimeter. (WAC 246-247-040(5) , WAC 246-247-060(5) and WAC 246-247-075(4))

**Frazier, Thomas (DOH)**

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**From:** Faust, Eric T <Eric.Faust@rl.doe.gov>  
**Sent:** Thursday, December 01, 2016 11:15 AM  
**To:** Frazier, Thomas (DOH)  
**Cc:** Kaldor, Reed A; Karschnia, Paul T; Carleo, Frank J; Schmidt, John W (DOH)  
**Subject:** RE: Preliminary Drafts of Licenses for Decon Trailers TRU Waste Retrieval (NOC 1069), Cleaning Rad Contaminated Vehicles (NOC 1073), and Integrated Disposal Facility Operation (NOC 1068)

Tom,

After going over the IDF, TRU Retrieval, and RCV EUs, CHPRC had a few minor comments:

IDF (NOC 1068) – The total abated limit mentioned within Condition 1 gives a value of 4.80E-01. The standing permit license mentions 4.85E-01 mrem/yr.

TRU Retrieval (NOC 1069) – The abated and unabated emission limits within Condition 1 and 3 state that “The emission unit does not have an abated/unabated PTE.” The standing license shows 1.55E-5 mrem/yr for both the abated and unabated PTE limits.

RCVs (1073)– We have no comments.

Thanks and please contact myself or Tad / Frank if you have any questions,

Eric

---

**From:** Kaldor, Reed A  
**Sent:** Wednesday, November 30, 2016 1:08 PM  
**To:** Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>  
**Cc:** Faust, Eric T <Eric.Faust@rl.doe.gov>  
**Subject:** RE: Preliminary Drafts of Licenses for Decon Trailers TRU Waste Retrieval (NOC 1069), Cleaning Rad Contaminated Vehicles (NOC 1073), and Integrated Disposal Facility Operation (NOC:1068)

Tom –

I have no comments for EU 1465 NOC 1073. Thanks.

Reed

---

**From:** Frazier, Thomas (DOH) [mailto:Thomas.Frazier@DOH.WA.GOV]  
**Sent:** Thursday, November 17, 2016 2:42 PM  
**To:** Faust, Eric T <Eric.Faust@rl.doe.gov>  
**Cc:** Carleo, Frank J <Frank\_J\_Carleo@rl.gov>; Kaldor, Reed A <Reed\_A\_Kaldor@rl.gov>; Schmidt, John <john.schmidt@doh.wa.gov>  
**Subject:** Preliminary Drafts of Licenses for Decon Trailers TRU Waste Retrieval (NOC 1069), Cleaning Rad Contaminated Vehicles (NOC 1073), and Integrated Disposal Facility Operation (NOC 1068)

4

7015 0640 0007 5050 7913

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USDOE - RL  
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STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

AIR 16-1206  
NOC 1069

OFFICE OF RADIATION PROTECTION

309 Bradley Blvd., Suite 201 • Richland, Washington 99352

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December 8, 2016

**CERTIFIED MAIL**

7015 0640 0007 5050 7913

Mr. Doug Shoop, Manager  
United States Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN: A5-14  
Richland, Washington 99352

Re: 28-Day Draft Approval of Notice of Construction (NOC) 1069

Reference: Email (LB# 4751), from John Schmidt (WDOH) to Multiple USDOE Staff, "NOC Consolidation", dated June 30, 2016.

Mr. Shoop:

As per the reference email, we have worked with your staff to make changes to move the NOCs and/or Emission Units (EUs) associated with this license from a one-to-many, to a one-to-one relationship. We appreciate your cooperation and willingness to support our future database needs and to make license actions more efficient and cost effective moving forward.

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), the update will be approved according to the enclosed License for:

**Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (replaces NOC 851)  
(EU 1462; NOC 1069)**

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

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 approval, please contact Thomas Frazier at [thomas.frazier@doh.wa.gov](mailto:thomas.frazier@doh.wa.gov) or, by phone, at (509) 946-0774.

Sincerely,



John Martell, Manager  
Radioactive Air Emissions Section

Enclosures: (1) Conditions and Limitations for EU 1462 (NOC 1069)  
(2) Request for Adjudicative Proceedings

cc: (see next page)

cc: Ruth Allen, WRPS  
Matthew Barnett, PNNL  
Lilyann Bauder, Ecology  
Shawna Berven, WDOH  
Lucinda Borneman, WRPS  
Lee Bostic, BNI  
Frank Carleo, CHPRC  
Cliff Clark, USDOE-RL  
Jack Donnelly, WRPS  
Dennis Faulk, EPA  
Eric Faust, USDOE-RL  
Thomas Frazier, WDOH  
Gary Fritz, MSA  
Philip Gent, Ecology  
Daniel Heuston, Ecology  
Reed Kaldor, MSA  
Paul Karschnia, CHPRC  
Jim McAuley, EPA  
John Schmidt, WDOH  
Jeff Voogd, WRPS  
Environmental Portal  
RAES Tracking: Line 16-190; EU 1462; NOC 1069

200

**Decon Trailers TRU Waste Retrieval (Diff/Fug)**

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

Miscellaneous Support Facilities

**Abatement Technology** NONE 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
--------------	----------------------	---------------------	------------------------

**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 246-247-040(5) & WAC 246-247-060(5)	Hanford Site Near-Facility Environmental Ambient Monitoring Program	Alpha/Beta/Gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations.

**Sampling Requirements** Radiological field surveys and near field monitoring

**Additional Requirements**

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

**Operational Status** This emission unit covers Diffuse and Fugitive emissions in Transuranic Decontamination trailers where contaminated material or individuals enters into the trailer when the active powered exhaust is not operational.

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

Project Title	Approval #	Date Approved	NOC_ID
Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (replaces NOC 851)		Not Approved	1069

**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 1.55E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).
- 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.

All work will be performed in accordance with approved radiological control methods and as low as reasonably achievable (ALARA) program requirements. These requirements will be carried out through radiological control procedures.

The general physical processes associated with decontamination activities in the decontamination trailer will consist of the following:

- a.) On identification of the need for additional decontamination of personnel, affected individuals will be escorted to the decontamination trailer.
- b.) As appropriate, contaminated clothing, coverings, and/or articles will be removed, packaged, and dispositioned in accordance with applicable facility waste handling procedures.
- c.) Personnel decontamination processes might include various methods or a combination of cleaning agents

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

Docket No:  
**REQUEST FOR ADJUDICATIVE PROCEEDING**

Approval No:  
**AIR 16-1206**

In Re The Approval of:  
**Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (replaces NOC 851)  
(NOC 1069; EU 1462)**

THE STATE OF WASHINGTON TO:

**Mr. Doug Shoop, Manager  
United States Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN: A5-14  
Richland, Washington 99352**

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 16-1206**.

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 16-1206**, dated **December 8, 2016**, 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 #: \_\_\_\_\_



5

December xx, 2016

Mr. Doug Shoop, Manager  
United States Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN: A5-14  
Richland, Washington 99352

Dear Mr. Shoop:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your application was approved, as negotiated, on Sept 12 2016, according to the enclosed EU specific license.

**Decon Trailers TRU Retrieval Diffuse/Fugitive Operation (replaces NOC 851)  
(NOC 1069, EU1462)**

The conditions, controls, monitoring requirements, and limitations of this license must be observed in order for you to be in compliance with WAC 246-247. Failure to meet any provision of this license may result in the revocation of approval, the issuance of Notices of Violation, or other enforcement actions under WAC 246-247-100.

If you have any questions regarding this approval, please contact Tom Frazier at [Thomas.Frazier@doh.wa.gov](mailto:Thomas.Frazier@doh.wa.gov) or, by phone, at (509) 946-0774).

Sincerely,

John Martell, Manager

Radioactive Air Emissions Section

Enclosure: NOC 1069 for EU 1462

cc: Ruth Allen, WRPS  
Matthew Barnett, PNNL  
Shawna Berven, WDOH  
Lilyann Bauder, Ecology  
Lucinda Borneman, WRPS  
Lee Bostic, BNI  
Cliff Clark, USDOE-RL  
Jack Donnelly, WRPS  
Rick Engelmann, CHPRC  
Dennis Faulk, EPA  
Thomas Frazier, WDOH  
Eric Faust, USDOE-RL  
Gary Fritz, MSA  
Phil Gent, Ecology  
Reed Kaldor, MSA  
Paul Karschnia, CHPRC  
Valarie Peery, Ecology  
Maria Skorska, Ecology  
John Schmidt, WDOH  
Jeff Voogd, WRPS  
Joan Woolard, MSA  
Davis Zhen, EPA  
Environmental Portal  
RAES Tracking: Line 16-190 EU 1462; NOC 1069

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**Decon Trailers TRU Waste Retrieval (Diff/Fug)**

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

Miscellaneous Support Facilities

**Abatement Technology** NONE 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
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**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 246-247-040(5) & WAC 246-247-060(5)	Hanford Site Near-Facility Environmental Ambient Monitoring Program	Alpha/Beta/Gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations.

**Sampling Requirements** Radiological field surveys and near field monitoring

**Additional Requirements**

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

**Operational Status** This emission unit covers Diffuse and Fugitive emissions in Transuranic Decontamination trailers where contaminated material or individuals enters into the trailer when the active powered exhaust is not operational.

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

Project Title	Approval #	Date Approved	NOC_ID
Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (replaces NOC 851)		Not Approved	1069

**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 1.55E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)).
- 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.

All work will be performed in accordance with approved radiological control methods and as low as reasonably achievable (ALARA) program requirements. These requirements will be carried out through radiological control procedures.

The general physical processes associated with decontamination activities in the decontamination trailer will consist of the following:

- a.) On identification of the need for additional decontamination of personnel, affected individuals will be escorted to the decontamination trailer.
- b.) As appropriate, contaminated clothing, coverings, and/or articles will be removed, packaged, and dispositioned in accordance with applicable facility waste handling procedures.
- c.) Personnel decontamination processes might include various methods or a combination of cleaning agents

(e.g., soap and water, pre-moistened towelettes, shaving cream-type foam decontamination agents for facial areas, removal of hair, and abrasive soaps for toughened skin surfaces [e.g., hands and feet]).

D.) Spent decontamination solutions will be transferred from the holding tanks directly to a mobile disposal unit or containerized (e.g., packaged in absorbents in drums or placed in drums or carboys) and transported to existing facilities on the Hanford Site for disposal.

Periodic maintenance inspections of the decontamination trailer will be performed without use of containment or portable exhausters.

- 3) The PTE for this project as determined under WAC 246-247-030(21)(a-e) [as specified in the application] is 1.55E-05 mrem/year. Approved are the associated potential release rates (Curies/year) of:

Am - 241	8.37E-04	Solid	WAC 246-247-030(21)(a)
----------	----------	-------	------------------------

Alpha release rate based on Am-241. Any radionuclide might be present Am-241 is representative of the alpha-emitting radionuclides present.

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Cs - 137	4.19E-03	Solid	WAC 246-247-030(21)(a)
----------	----------	-------	------------------------

Beta/Gamma release rate based on Cs-137. CS-137 is representative of the Beta/gamma-emitting radionuclides present..

The radioactive isotopes identified for this emission unit are (no quantities specified):

Am - 241            Cs - 137

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

- 4) **MONITORING-Near Field Monitoring and Radiological Surveys**  
Periodic Confirmatory Measurements (PCM) for the diffuse and fugitive emissions shall be provided by the established near facility monitoring and augmented by radiological surveys during personnel decontamination operations (e.g., smears and hand-held radiation monitoring measurements of the interior/exterior of the decontamination trailer). These methods are intended to demonstrate compliance by showing that while remaining under the contamination levels by which work is controlled, the actual emissions inherently will be below the emission estimates. (WAC 246-247-040(5), WAC 246-247-060(5) and WAC 246-247-075(4))
- 5) **EMISSIONS-Included in Overall Fugitive and Diffuse Estimate**  
Emissions will be included in the overall fugitive and diffuse emission estimate for reporting purposes as part of the approved ambient air monitoring conducted at the Hanford Site perimeter. (WAC 246-247-040(5), WAC 246-247-060(5) and WAC 246-247-075(4))

**5**



LB# 4925

AIR 17-117  
NOC 1069

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 10, 2017

Mr. Doug Shoop, Manager  
United States Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN: A5-14  
Richland, Washington 99352

Re: Final Approval of Notice of Construction (NOC) 1069

Mr. Shoop:

Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your revision was approved, as negotiated, on January 9, 2017, according to the enclosed (EU) specific license for:

**Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (Replaces NOC 851)  
(EU 1462; NOC 1069)**

The conditions, controls, monitoring requirements, and limitations of this license must be observed in order for you to be in compliance with WAC 246-247. Failure to meet any provision of this license may result in the revocation of approval, the issuance of Notices of Violation, or other enforcement actions under WAC 246-247-100.

If you have any questions regarding this approval, please contact Tom Frazier at [Thomas.Frazier@doh.wa.gov](mailto:Thomas.Frazier@doh.wa.gov) or (509) 946-0774.

Sincerely,

John Martell, Manager  
Radioactive Air Emissions Section

Enclosure: NOC 1069 for EU 1462

cc: (see next page)



Mr. Doug Shoop  
January 10, 2017  
Page 2 of 2

AIR 17-117

cc: Ruth Allen, WRPS  
Matthew Barnett, PNNL  
Lilyann Bauder, Ecology  
Shawna Berven, WDOH  
Lucinda Borneman, WRPS  
Lee Bostic, BNI  
Frank Carleo, CHPRC  
Cliff Clark, USDOE-RL  
Jack Donnelly, WRPS  
Rick Engelmann, CHPRC  
Dennis Faulk, EPA  
Eric Faust, USDOE-RL  
Thomas Frazier, WDOH  
Gary Fritz, MSA  
Phil Gent, Ecology  
Reed Kaldor, MSA  
Paul Karschnia, CHPRC  
Jim McAuley, EPA  
John Schmidt, WDOH  
Jeff Voogd, WRPS  
Environmental Portal  
RAES Tracking: Line 16-190; EU 1462; NOC 1069



Emission Unit ID: 1462

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**Decon Trailers TRU Waste Retrieval (Diff/Fug)**

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

Miscellaneous Support Facilities

**Abatement Technology** NONE 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
--------------	----------------------	---------------------	------------------------

**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 246-247-040(5) & WAC 246-247-060(5)	Hanford Site Near-Facility Environmental Ambient Monitoring Program	Alpha/Beta/Gamma	Per the sitewide ambient monitoring program, samples will be collected from the existing near-facility monitoring stations.

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**Additional Requirements**

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

**Operational Status** This emission unit covers Diffuse and Fugitive emissions in Transuranic Decontamination trailers where contaminated material or individuals enters into the trailer when the active powered exhaust is not operational.

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

Project Title	Approval #	Date Approved	NOC_ID
Decon Trailers TRU Waste Retrieval Diffuse/Fugitive Operation (replaces NOC 851)	AIR 17-117	1/9/2017	1069

**Conditions (state only enforceable: WAC 246-247-040(5), 060(5) if not specified)**

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- 3) The PTE for this project as determined under WAC 246-247-030(21)(a-e) [as specified in the application] is  $1.55E-05$  mrem/year. Approved are the associated potential release rates (Curies/year) of:

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Alpha release rate based on Am-241. Any radionuclide might be present Am-241 is representative of the alpha-emitting radionuclides present.			
Cs - 137	4.19E-03	Solid	WAC 246-247-030(21)(a)
Beta/Gamma release rate based on Cs-137. CS-137 is representative of the Beta/gamma-emitting radionuclides present..			

The radioactive isotopes identified for this emission unit are (no quantities specified):

Am - 241            Cs - 137

The potential release rates described in this Condition were used to determine control technologies and monitoring requirements for this approval. DOE must notify the Department of a "modification" to the emission unit, as defined in WAC 246-247-030(16). DOE must notify the Department of any changes to a NESHAP major emission unit when a specific isotope is newly identified as contributing greater than 10% of the potential TEDE to the MEI, or greater than 25% of the TEDE to the MEI after controls. (WAC 246-247-110(9)) DOE must notify the Department of any changes to potential release rates as required by state or federal regulations including changes that would constitute a significant modification to the Air Operating Permit under WAC 173-401-725(4). Notice will be provided according to the particular regulation under which notification is required. If the applicable regulation(s) does not address manner and type of notification, DOE will provide the Department with advance written notice by letter or electronic mail but not solely by copies of documents.

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- 5) **EMISSIONS-Included in Overall Fugitive and Diffuse Estimate**  
Emissions will be included in the overall fugitive and diffuse emission estimate for reporting purposes as part of the approved ambient air monitoring conducted at the Hanford Site perimeter. (WAC 246-247-040(5), WAC 246-247-060(5) and WAC 246-247-075(4))