



M#8,317

OFFICE OF RIVER PROTECTION
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

OCT 15 2014

14-ECD-0050

RECEIVED

OCT 16 2014

WA Dept of Health
Radioactive Air Emissions Section

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)

Mr. Martell:

THE U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITS THE REPORT OF CLOSURE FOR EMISSION UNIT 200E P-296AN-001 (296-A-29) CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, THE U.S. DEPARTMENT OF ENERGY HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01

The U.S. Department of Energy, Office of River Protection submits to the Washington State Department of Health the Report of Closure for Emission Unit 200E P-296AN-001 (296-A-29) currently in the Hanford Site Air Operating Permit, Permit Number 00-05-006, Renewal 1, U.S. Department of Energy Hanford Site Radioactive Air Emissions License Number FF-01. The Report of Closure is required pursuant to WAC 246-247-080(6), "Inspections, Reporting, and Recordkeeping," and documents the cessation of radionuclide emitting activities and is found in Attachment 1. This information and the required form in Attachment 2 are necessary to facilitate removal of the emission unit from the Air Operating Permit.

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

NOC 827
EU 227

Mr. John Martell
14-ECD-0050

-2-

OCT 15 2014

cc w/attachs:

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

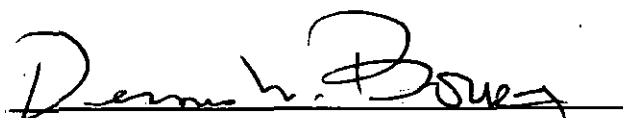
cc w/o attachs:

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

Attachment 1
14-ECD-0050
(3 Pages)

Report of Closure/Permit Revision

Report of Closure for Emission Point P-296AN-001 (296-A-29)


Dennis W. Bowser

Report of Closure/Permit Revision

NOTE: Any increase to abated or unabated PTE requires a full NOC modification

REASON FOR CHANGE

Submittal Date: 10/15/2014

Submittal Type: Other Submittal

- NOC Application Revision**
New NOC Rev Number: _____
- Condition Change/ Clarification**
WDOH Condition Number: _____
AOP Condition Number: _____
- ALARACT Revision**
New ALARACT Rev Number: _____
- REPORT OF CLOSURE ****

PROJECT IDENTIFICATION

Project Title: Report of Closure for Emission Point P-296AN-001 (296-A-29)
Current NOC Application Number: DOE/ORP-2000-15
AEI ID Number (AOP Emission Unit Number(s): P-296AN-001 (Eu 227)
Current WDOH Approval Letter Number(s): AIR 12-309
WDOH NOC ID Number: ~~227~~ 827

DESCRIPTION OF CHANGE

Number of Attachments None

**** Report of Closure for Emission Unit P-296AN-001 (296-A-29)**

Summary/Introduction

In accordance with Washington Administrative Code 246-247-080(6), this report of closure is being submitted to the State of Washington Department of Health (WDOH) to document cessation of radionuclide emitting activities for Emission Unit P-296AN-001 (296-A-29).

The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future plans
- Emissions control and monitoring

1. Date of closure

Emission unit P-296AN-001 (296-A-29) was a primary exhaustor for the 241-AN Tank Farm and has since been replaced with a new exhaustor system approved and operating under emission units P-296A044-001 (296-A-44, EU ID 735) and P-296A045-001(296-A-45, EU ID 736).

The 296-A-29 exhaustor operated under the *Radioactive Air Emissions Notice of Construction Application for Installation and Operation of a Waste Retrieval System in Tanks 241-AN-101,*

241-AN-102, 241-AN-103, 241-AN-104, 241-AN-105, and 241-AN-107 (DOE/ORP-2000-15, Revision 0, April 2000). Note: Tank 241-AN-106 was omitted from the title of DOE/ORP-2000-15, but was included in the summary listed in the Air Operating Permit Database.

The emissions from 296-A-29 were reported annually, until it ceased operations permanently in September 2008, as last reported in *Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2008* (DOE/RL-2009-14, Revision 0, June 2009), with the following excerpt:

296-A-29 This minor stack exhausted filtered air from the 241-AN tanks, until it ceased operations permanently in September 2008, replaced by the 296-A-44 and 296-A-45 major stacks. Particulate emissions were sampled.

2. Remaining material

The 296-A-29 exhauster, associated ventilation components, and condensate drain line were isolated in 2008, permanently ceasing operations in September 2008. Work Package (WFO-WO-07-3187; 241-AN Connect New VTP Exhausters to Vent System) which tied in the new exhauster was closed on June 6, 2008. The exhauster components were removed from the AN Tank Farm in four phases, completed in 2011, and disposed of at an onsite burial site with the following work packages:

TFC-WO-09-4037; 241-AN, Remove and Dispose K1 HEPAs
TFC-WO-10-4245; 241-AN, Isolate/Remove Abandoned K1 Electrical
TFC-WO-10-4246; 241-AN, Remove Abandoned K-1 Exhaust Equipment
TFC-WO-10-4247; 241-AN, Remove Abandoned K1 Exhaust Equipment (clean side)

3. Assessment of potential continued emissions

There is no potential for continued emissions from the 296-A-29 exhauster because it has been permanently isolated from the operational exhaust train and all associated equipment has been removed, as depicted in Figure 1.

4. Future plans

There are no future plans for the 296-A-29 exhauster.

5. Emissions control and monitoring

Emissions control and monitoring are no longer required. There is no potential to emit because the 296-A-29 exhauster has been removed.

Based on this report of closure it is requested that emission unit P-296AN-001 (296-A-29, EU ID 227) be removed from the FF-01 License and from the Hanford Site Air Operating Permit (AOP Permit 00-05-006/ License Number FF-01).

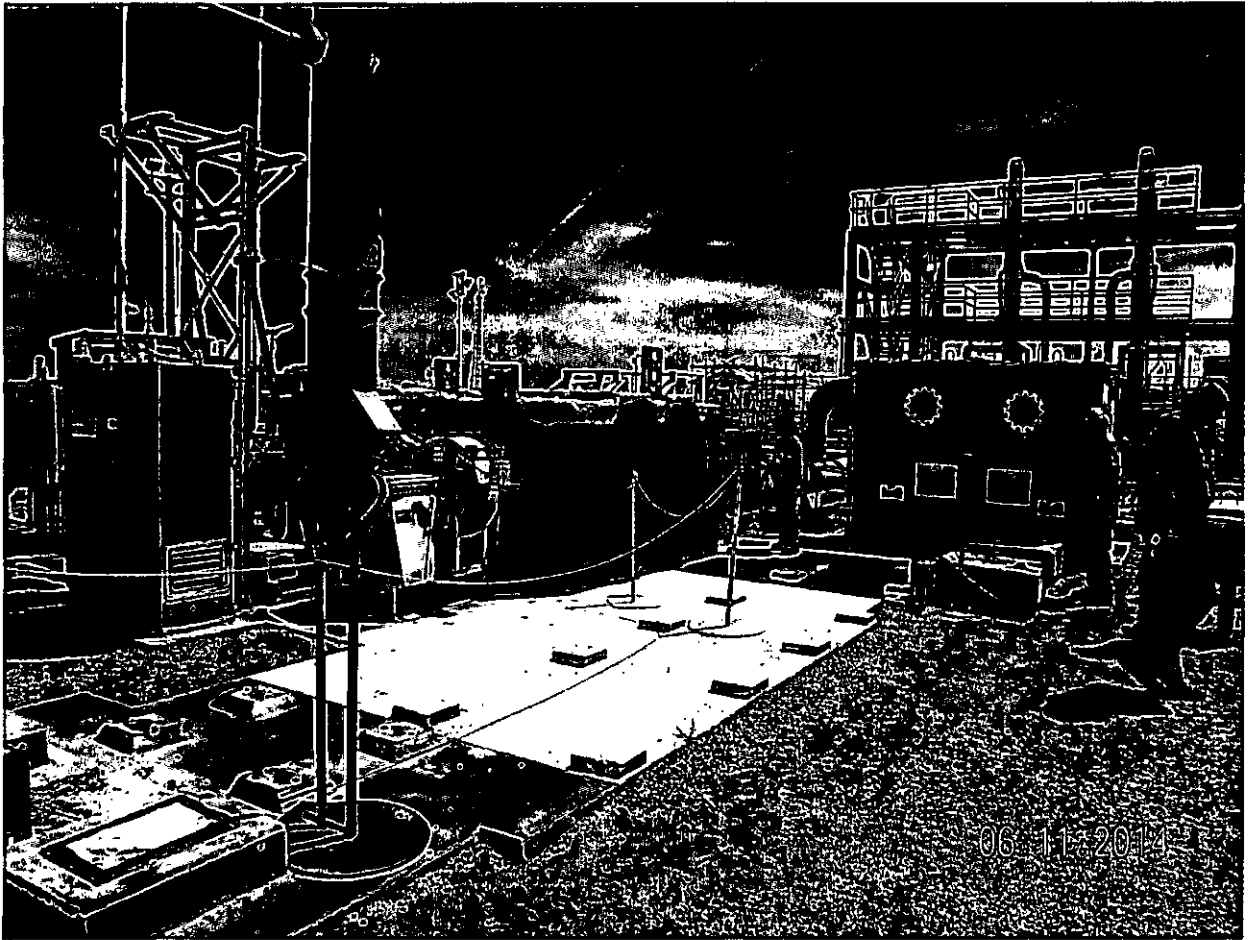
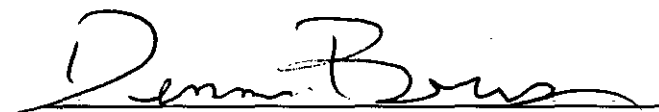


Figure 1. Empty Pad in AN Tank Farm, showing former location of 296-A-29 exhaust system, as of WDOH inspection on June 11, 2014

Attachment 2
14-ECD-0050
(1 Page)

Notification of Change Not Requiring Permit Revision


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 provided 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):

Description of the change:
Removing Emission point P-296AN-001 (296-A-29), EU #227, From AOP Permit 00-05-006/License number FF-01. See attached Report of Closure.
Date of change:
Effective upon approval, or on the 7 th day following submittal of the change.
Describe the emissions resulting from the change:
No emissions result from this change. See attached Report of Closure.
List any permit term or condition that will no longer be applicable as a result of the change:
Those identified in WDOH approval letter AIR-12-309.

* 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.