

LB# 4346



AIR 15-406
NOC 954

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

April 15, 2015

CERTIFIED MAIL

7011 2000 0002 2834 8655

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

Re: Notice of Construction Application to Modify Radionuclides Monitored/Sampled

Reference: 1. Letter 15-ECD-0003 (IM# 8,388), K.W. Smith to P. John Martell, "Notice of Construction (NOC) Application for the License Revision Requests for 2000W S-296S021-001 (296-S-21), 200E P-296A044-001 (296-A-44), 200E P-296A045-001 (296-A-45), 200E P-296A046-001 (296-A-46), and 200E P-296A047-001 (296-A-47), Contained in the Hanford Site Air Operation Permit, Permit Number 00-05-006, U.S. Department of Energy Hanford Site Radioactive Air Emissions License Number FF-01"

Dear Mr. Smith:

The completeness review for reference 1, pertaining to emission unit 296-S-21 (EU 254) only, was completed and no further information is required. The license revision for EU 254 requests the addition of Am-241 to the "Radionuclides Requiring Measurement" section of the license. Pursuant to Chapter 246-247 of the Washington Administrative Code (WAC), your revision will be approved according to the enclosed emission unit specific license for:

**License to Operate the 222-S Laboratory (Replaced NOC ID 881)
(NOC 954; EU 254)**

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.



Mr. Kevin Smith
April 15, 2015
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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 draft approval, please contact Mr. Thomas Frazier at (509) 946-0774.

Sincerely,


P. John Martell, Manager
Radioactive Air Emissions Section

Enclosures: 1. Emission Unit Information for EU 254
2. Request for Adjudicative Proceedings

cc: (see next page)

Mr. Kevin Smith
April 15, 2015
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cc: Ruth Allen, WRPS
Matthew Barnett, PNNL
Lucinda Borneman, WRPS
Lee Bostic, BNI
Dennis Bowser, USDOE-ORP
Cliff Clark, USDOE-RL
Jack Donnelly, WRPS
Rick Engelmann, CHPRC
Dennis Faulk, EPA
Thomas Frazier, WDOH
Gary Fritz, MSA
Phil Gent, Ecology
Robert Haggard, BNI
Dale Jackson, USDOE-RL
Jessica Joyner, WRPS
Reed Kaldor, MSA
Paul Karschnia, CHPRC
Ed MacAlister, USDOE-RL
Valarie Peery, Ecology
Maria Skorska, Ecology
Bryan Trimberger, USDOE-ORP
Randy Utley, WDOH
Jeff Voogd, WRPS
Joan Woolard, MSA
Davis Zhen, EPA
Environmental Portal
RAES Tracking: Line 15-3; Resp. to IM# 8,388; EU 254; NOC 954

Emission Unit ID: 254

200W S-296S021-001

296-S-21

This is a MAJOR, ACTIVELY ventilated emission unit.

222-S LABORATORY

Emission Unit Information

Stack Height: 68.00 ft. 20.73 m. Stack Diameter 5.50 ft. 1.68 m.

Average Stack Effluent Temperature: 78 degrees Fahrenheit. 26 degrees Celsius.

Average Stack Exhaust Velocity: 63.16 ft/second. 19.25 m/second.

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
	HEPA	3	In series for both the primary and backup exhaust systems (222-S Lab Hot Cells)
	HEPA	1	For both primary and backup exhaust systems (222-S Lab Complex)
	Fan	3	Primary exhaust operated in parallel, serves both hot cell addition & main lab.
	Fan	1	Backup exhaust operates independently or in parallel with primary exhaust

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
40 CFR 61.93(b)(4)(i) & WAC 246-247-075(2)	40 CFR 61, Appendix B Method 114	Sr-90, Cs-137, Am-241 and Pu-239	Continuous

Sampling Requirements Record Sample

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 is a laboratory building/facility exhauster that is used to ventilate building and facility operations such as but not limited to contaminated rooms, hot cells, glove boxes, and hoods, that support tank farm waste characterization activities, research and development, environmental sample analysis, and Hanford operations and remediation projects. The exhauster can be used to support current surveillance, maintenance activities, operations, decontamination, and cleanup activities within the building/facility. The emission unit is a laboratory building/facility exhauster ventilation system that operates continuously.

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

Project Title	Approval #	Date Approved	NOC_ID
License to Operate the 222-S Laboratory (Replaced NOC ID 881)		Not Approved	954

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 1.02E-03 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 3.00E+00 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).

- 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.

The 222-S Laboratory was built in the early 1950's to provide analytical services, first for the reduction and oxidation (REDOX) process, and later for several programs and plant operations. In 1994 Project W-041H, Environmental Hot Cell Expansion, provided the hot cell facility, an addition of the east end of the 222-S Laboratory that includes the 11A hot cells and associated fume hoods. The increased hot cell capacity was required to support an increased demand for analytical services.

The 222-S Laboratory primarily receives, processes, and stores samples from various projects and packages samples for shipment to other onsite and offsite laboratories. The 222-S Laboratory is also used for sample analysis, testing, and process development. The majority of samples are from the single-shell tanks (SST) and double-shell tanks (DST) in the tank farm system with a few samples coming from other facilities such as the 242-A Evaporator, K Basins Project, Plutonium Finishing Plant (PFP), and the 219-S Waste Handling Facility. All SST and DST samples and most other samples are received through the 11A hot cell.

The 222-S Laboratory is also used for waste management activities, such as waste transfers to the 219-S Waste Handling Facility and other activities supporting laboratory and other Hanford Site operations. The 222-S Laboratory manages waste generated at 222-S Laboratory and small amounts of radioactive waste not generated at the 222-S Laboratory (i.e., for short-term storage or transfer to the 219-S Tank System).

The 222-S Laboratory undergoes operation and maintenance activities that occur in the radioactive portion of the facility and contribute to emissions through the 296-S-21 stack. Nonanalytical portions of the facility that exhaust through the 296-S-21 stack are the basement, tunnels, and other miscellaneous sources (e.g., vented storage cabinets).

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

<p>Ac - 227 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Am - 241 6.76E+01 Identified as contributing greater than 0.1 mrem/yr to the MEI, greater than 10% of the potential TEDE to the MEI, and greater than 25% of the TEDE to the MEI after controls.</p>	<p>Am - 243 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>
<p>Ba - 137 m Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>C - 14 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Cd - 113 m Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>
<p>Cm - 242 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Cm - 243 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Cm - 244 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>
<p>Co - 60 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Cs - 134 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Cs - 137 3.16E+03 Identified as contributing greater than 0.1 mrem/yr to the MEI, greater than 10% of the potential TEDE to the MEI, and greater than 25% of the TEDE to the MEI after controls.</p>
<p>Eu - 152 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Eu - 154 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>	<p>Eu - 155 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.</p>
<p>H - 3 Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10%</p>		

of the unabated PTE and represents less than 25% of the abated dose.

Ni - 59

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Pa - 231

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Pu - 240

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Ra - 226

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Sb - 125

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Sn - 126

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Th - 229

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

U - 233

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

U - 236

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Zr - 93

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

I - 129

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Ni - 63

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Pu - 238

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Pu - 241

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Ra - 228

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Se - 79

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Sr - 90

9.00E+03

Identified as contributing greater than 0.1 mrem/yr to the MEI

Th - 232

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

U - 234

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

U - 238

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Nb - 93 m

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Np - 237

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Pu - 239

6.85E+01

Identified as contributing greater than 0.1 mrem/yr to the MEI, greater than 10% of the potential TEDE to the MEI, and greater than 25% of the TEDE to the MEI after controls.

Pu - 242

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Ru - 106

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Sm - 151

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Tc - 99

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

U - 232

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

U - 235

Contributes less than 0.1 mrem/yr to the MEI, and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

Y - 90

Contributes less than 0.1 mrem/yr to the MEI and represents less than 10% of the unabated PTE and represents less than 25% of the abated dose.

- 4) HEPA Filters for the S-21 exhauster will meet the requirements of HNF-S-0477 and/or HNF-S-0552 which assure equivalency to ASME AG-1: Code on Nuclear Air and Gas Treatment.
- 5) Quality Assurance program will meet the requirements of 40 CFR 61, Appendix B, Method 114.
- 6) Air sampling will be conducted in accordance with ANSI/HPS N13.1-1999: Sampling and Monitoring Releases of Airborne Radioactive Substances from the Stacks and Ducts of Nuclear Facilities.

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

Docket No:
REQUEST FOR ADJUDICATIVE PROCEEDING

In Re The Approval of:
License to Operate the 222-S Laboratory (Replaced NOC ID 881) (NOC 954; EU 254)

Draft Approval No: **AIR 15-406**

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 15-406.

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 15-303, dated March 11, 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 #: _____

U.S. Postal Service
CERTIFIED MAIL RECEIPT
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For delivery information visit our website at www.usps.com

OFFICIAL USE

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Return Receipt Fee (Endorsement Required)	2.70	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 7.19	

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City, State, ZIP+4

PS Form 3800, August 2006 See Reverse for Instructions

598 4922 0002 2834 8655 7011

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

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

AIR 15-406

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
[Signature] Addressee

B. Received by (Printed Name) Agent
[Signature] Addressee

C. Date of Delivery
4/29/15

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes