



IM#8,387

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

JAN 14 2015

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JAN 16 2015

WA Dept of Health
Radioactive Air Emissions Section

15-ECD-0002

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)

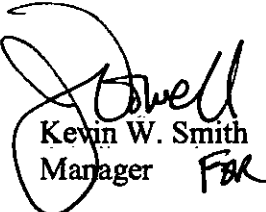
Mr. Martell:

**U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SUBMITTAL TO
THE WASHINGTON STATE DEPARTMENT OF HEALTH, LICENSE REVISIONS
PERTAINING TO THE BREATHER FILTER FOR SINGLE-SHELL TANK 241-BX-104**

As a result of recent discussions with the Washington State Department of Health, the U.S. Department of Energy, Office of River Protection is requesting your review and approval of the attached license revision forms. When approved, the revision contained in the attached forms will modify air permitting requirements for the breather filter on Single-Shell Tank 241-BX-104.

If you have any questions, please contact Dennis W. Bowser, Environmental Compliance Division, (509) 373-2566.

ECD:DWB


Kevin W. Smith
Manager *FK*

Attachments:

1. License/ALARACT Revision Request for 241-BX-104
2. Notification of Change not Requiring Permit Revision for 241-BX-104

cc: See page 2

Mr. John Martell
15-ECD-0002

-2-

JAN 14 2015

cc w/attachs:

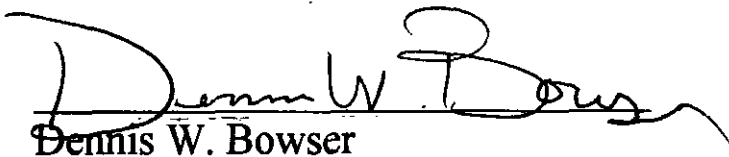
P.M. Gent, Ecology
R.A. Kaldor, MSA
R.J. Utley, WDOH
Environmental Portal, LMSI
WRPS Correspondence

cc w/o attachs:

B.G. Erlandson, BNI
J. Cox, CTUIR
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
15-ECD-0002
(1 Page)

License/ALARACT Revision Request


Dennis W. Bowser

License / ALARACT Revision Request

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

Submittal Date: 10/29/2014

- License Revision**
WDOH Condition Number: N/A
- ALARACT Revision**
New ALARACT Rev. #: _____
- Report of Closure**

PROJECT IDENTIFICATION

Project Title: 241-BX-104 Breather Filter
Current NOC Application Number: n/a
WDOH EU ID Number: EU 255
Current WDOH Approval Letter Number(s): n/a
WDOH NOC ID Number: n/a

DESCRIPTION OF CHANGE

Number of Attachments: 0

WDOH will provide a new approval letter containing any new or modified conditions that result from the following proposed change.

Enter original and proposed wording here:

Under Additional Requirements:

Current wording:

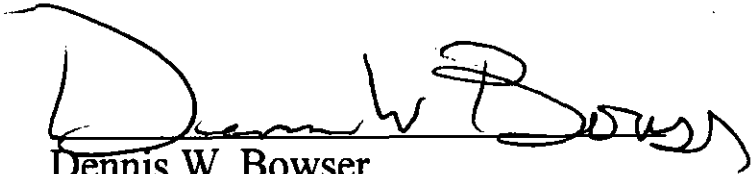
An alternate sampling method for breather filters with stack extensions may be performed by removing the test port cap downstream of the HEPA filter, surveying the cap and inserting smear media (e.g. swab, masslin) in the opening and smearing the interior ducting surface on the opposite side of the test port cap opening. Breather filters shall be aerosol tested every 365 days.

Change to:

Radial breather filters shall be replaced every 365 days

Attachment 2
15-ECD-0002
(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 proved to Ecology, WDOH, and EPA at least 7 days before making the change, and
5. Change does not violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
6. A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Permit Number: 00-05-006

Provide the following information pursuant to WAC-173-401-722(2)(a):

Description of the change:
241-BX-104 (EU 255) has been changed from a G-1 breather filter to a radial breather filter. The following is proposed for the "Additional Requirements" condition for this emission unit: "Radial breather filters shall be replaced every 365 days."
Date of change:
September 9, 2014.
Describe the emissions resulting from the change:
There is no anticipated change to the emissions.
List any permit term or condition that will no longer be applicable as a result of the change:
"An alternate sampling method for breather filters with stack extensions may be performed by removing the test port cap downstream of the HEPA filter, surveying the cap and inserting smear media (e.g. swab, masslin) in the opening and smearing the interior ducting surface on the opposite side of the test port cap opening. Breather filters shall be aerosol tested every 365 days."

* 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.