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Department of Energy
Richland Operations Office
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WA Dept of Health
Radioactive Air Emissions Section

16-ESQ-0018

DEC 21 2015

Mr. D. Dossett, Unit Manager
Air Permits Unit AWT-150
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Mr. J. Martell, Manager
Radioactive Air Emissions Section
Washington State Department of Health
309 Bradley Boulevard, Suite 201
Richland, Washington 99352

Addressees:

TRANSMITTAL OF "RADIOACTIVE AIR EMISSIONS LICENSE/ALARACT REVISION REQUEST, AND NOTIFICATION OF OFF-PERMIT CHANGE, PERMIT NUMBER 00-05-006, RENEWAL 2," FOR CLOSURE OF THE PUREX TUNNELS AS A POINT SOURCE

This letter transmits per the Washington State Department of Health's (WDOH) letter dated May 6, 2014, (AIR 15-505) regarding "Closeout of Inspection (Audit 992) - Inspection of Emission Units 437 MN&ST (EU 385), 437-1-61 (EU 399), and 296-A-10 (EU 384)," the Radioactive Air Emissions License/As Low As Reasonably Achievable Control Technology (ALARACT) Revision Request form that requests closure of the Plutonium Uranium Extraction Plant (PUREX) Tunnels (EU 384) as a point source.

The PUREX Tunnels are currently listed in Table 2-1 of the FF-01 Radioactive Air Emissions License as Diffuse and Fugitive Emission Units 1015 and 1016. The License Closure Request Form and the Off-Permit Change Notification, Permit Number: 00-05-006, Renewal 2, documentation have been prepared in accordance with Washington Administrative Codes (WAC) 246-247 and WAC 173-401-724.

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Attachment 1 contains the Radioactive Air Emissions License/ALARACT Revision Request for submittal to the WDOH for approval, consistent with its authority to administer and enforce the State Radioactive Air Emissions Regulations, including licensing. A copy of this document is also being provided to the Washington State Department of Ecology (Ecology).

Attachment 2 is the Notification of Off-Permit Change, Permit Number: 00-05-006, Renewal 2 as required by WAC 173-401-724 for Ecology, pursuant with its administration of the Hanford Site Air Operating Permit.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,



Stacy Charboneau
Manager

ESQ:ETF

Attachments

cc w/attachs:

S. D. Berven, WDOH
D. A. Faulk, EPA
P. M. Gent, Ecology
E. R. McCormick, WDOH
V. L. Peery, Ecology
J. W. Schmidt, WDOH
D. Zhen, EPA
Environmental Portal

cc w/o attachs:

H. M. Belts, CHPRC
R. H. Engelmann, CHPRC
R. A. Kaldor, MSA
P. T. Karschnia, CHPRC

ATTACHMENT 1

LICENSE / ALARACT REVISION REQUEST
Permit Number: 00-05-006, Renewal 2

**Consisting of 3 pages,
including this cover page**

License / ALARACT Revision Request

NOTE: Any increase to abated or unabated potential to emit (PTE) is considered a modification and requires an Appendix A Application per Washington Administrative Code (WAC) 246-247.

Submittal Date: December 10, 2015

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

PROJECT IDENTIFICATION

Project Title: Reactivation of PUREX Storage Tunnel Number 2
Current WDOH NOC Number(s): 665
WDOH EU ID Number(s): 384
Current WDOH Approval Letter Number(s): AIR 06-1026

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:

Report of closure for PUREX tunnels (296-A-10).

As directed by WDOH letter air 15-505, this report of closure is submitted for closure of EU 384, PUREX tunnels (296-A-10) as a point source and removal from the FF-01 operating license. The PUREX Tunnels are already included in Table 2-1 of the FF-01 license as EUs 1015 and 1016.

The date of closure is the submittal date of this closure report. The amount of radioactive material in the tunnels remains unchanged from the placement of the last railcar in 1996. The 296-A-10 stack was deactivated and blanked off. The tunnel access points are posted and sealed to prevent access. The tunnel atmosphere is static and any potential continued emissions would come from a fugitive emission point. Air monitoring of these potential fugitive emissions is currently performed by the existing near facility monitoring network. The future plans for the

remediation of the waste stored in the tunnels is indeterminate. Any remediation actions that would require the unsealing of the tunnels would require the re-establishment of abatement controls and point source monitoring for a minor emission source.

Based on this report of closure, it is requested that the FF-01 license be revised to remove EU 384.

SIGNATURE

Licensee Name: STACY CHARBONEAU
Licensee Title: DOE RICHLAND OPERATIONS OFFICE MANAGER
Licensee Signature: Stacy Charbonau
Date: 12/21/15

ATTACHMENT 2

NOTIFICATION OF OFF-PERMIT CHANGE
Permit Number: 00-05-006, Renewal 2

**Consisting of 2 pages,
including this cover page**

NOTIFICATION OF OFF-PERMIT CHANGE

Permit Number: 00-05-006, Renewal 2

This notification is provided to the Washington State Department of Ecology, Washington State Department of Health, and the U.S. Environmental Protection Agency as a notice of an off-permit change described as follows.

The following changes are allowed pursuant to WAC 173-401-724(1), WAC 173-401-724(2), and WAC 173-401-724(6):

1. Change is not specifically addressed or prohibited by the AOP terms and conditions;
2. Change does not weaken the enforceability of the existing AOP conditions;
3. Change is not a Title I modification or subject to the acid rain requirements under Title IV of the FCAA;
4. Change meets all applicable requirements and does not violate an existing permit term or condition;
5. Change has complied with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Description of the change:

As directed by WDOH Letter Air 15-505, this Report of Closure is submitted for closure of EU 384, PUREX Tunnels (296-A-10) as a point source and removal from the FF-01 Operating License. The PUREX Tunnels are already included in Table 2-1 of the FF-01 license as EUs 1015 and 1016.

Date of change: (To be provided in the agency approval order.)

The date of closure is the date of approval.

Describe the emissions resulting from the change:

There will be no change in the emissions. The amount of radioactive material in the Tunnels remains unchanged from the placement of the last railcar in 1996. The 296-A-10 Stack was deactivated and blanked off. The Tunnel access points are posted and sealed to prevent access. The Tunnel atmosphere is static and any potential continued emissions would come from a fugitive emission point.

Describe the new applicable requirements that will apply as a result of the change:

(To be provided in the agency approval order.)

No new requirements apply. Air monitoring of these potential fugitive emissions is currently performed by the existing Near Facility Monitoring Network.