



AIR 13-905

STATE OF WASHINGTON
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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September 18, 2013

Mr. Ray J. Corey, Assistant Manager
for Safety and Environment
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-14
Richland, Washington 99352

Re: Transition of the Cold Vacuum Drying Facility (CVDF) to Regulation under the
Comprehensive Environmental Response, Compensation, and Liability Act
(CERCLA)

Mr. Corey:

This letter serves as the Radioactive Air Emissions Section's (RAES) response to the transition of the CVDF to CERCLA. The Department of Energy, Richland Operations (USDOE) has requested that the emission unit associated with CVDF (EU 436) be removed from the USDOE FF-01 Radioactive Air Emissions License. USDOE also requests that the affected licenses/Notices of Construction are deleted from the enforceable list. The RAES understands that the CVDF mission has been completed and will be used as an operations/ maintenance location supporting CERCLA activities until D4 activities are started.

With the interim mission as an operation/maintenance location, RAES has provided comments to the United States Environmental Protection Agency placing emphasis on the requirements that are stated in the Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities. RAES agrees with the transition of CVDF to CERCLA and will remove the associated emission unit from the FF-01 license. The license/Notices of Construction for the affected emission unit will also be removed from the enforceable list. With the removal of the associated emission unit from the FF-01 license, it is understood that all substantive requirements for the emission unit will be included into the CERCLA implementation document.

The removal of the emission unit from FF-01 and the removal of the emission unit from the enforceable list will take place on the next update of the FF-01 license. If you have any questions regarding this letter please feel free to contact Randy Utley at (509)-946-0534.

Sincerely,

John Martell, Manager
Radioactive Air Emissions Section

cc: (see next page)

cc: Ruth Allen, WRPS
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Environmental Portal
RAES Tracking: EU 436, NOC 836, IM# 7,711