



**OFFICE OF RIVER PROTECTION**

P.O. Box 450, MSIN H6-60  
Richland, Washington 99352

**APR 17 2015**

15-ECD-0020

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 SUBMITS THE REPORT OF CLOSURE FOR NOTICE OF CONSTRUCTION IDENTIFICATION NUMBER 850 CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01**

The U.S. Department of Energy, Office of River Protection hereby submits to the Washington State Department of Health the License/As Low As Reasonably Achievable Control Technology Revision Request: Report of Closure for Notice of Construction Identification Number 850 (NOC\_ID 850), "Removal of Liquid from Catch Tank 241-ER-311," Attachment 1. NOC\_ID 850 is currently in the Hanford Site Air Operating Permit, Number 00-05-006, Hanford Site Radioactive Air Emissions License Number FF-01.

Catch Tank 241-ER-311 was taken out of service in June of 2005. NOC\_ID 850 allowed for the evaporation of liquid from Catch Tank 241-ER-311. Evaporation was completed and the ventilation system was shut down. The activities under NOC\_ID 850 are complete, the license is not anticipated to be needed again, and is therefore being proposed for closure.

The Office of River Protection is forwarding the Report of Closure to Washington State Department of Health with a copy to the Washington State Department of Ecology. The Notification of Change Not Requiring Permit Revision Form, Attachment 2, is needed by the Washington State Department of Ecology to proceed with an Air Operating Permit revision.

NOC 850

EU 50, 486, & 910

Mr. John Martell  
15-ECD-0020

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

ECD:DWB

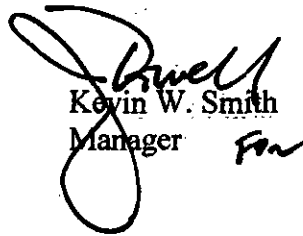
Attachments: (2)

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

  
Kevin W. Smith  
Manager *FW*

Attachment 1  
15-ECD-0020  
(2 Pages)

License/ALARACT Revision Request

  
\_\_\_\_\_  
Dennis W. Bowser *for*

## 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: 04/17/2015

License Revision

WDOH Condition Number: \_\_\_\_\_

ALARACT Revision

New ALARACT Rev. #: \_\_\_\_\_

Report of Closure

### PROJECT IDENTIFICATION

Project Title: Report of closure for Notice of Construction ID 850

Current WDOH NOC Number(s): AOP Permit 00-05-006/ License Number FF-01

WDOH EU ID Number(s): 50, 486, 910

Current WDOH Approval Letter Number(s): AIR 12-329

### 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 Notice of Construction ID 850**

#### **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.

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**

The closure date is the submittal date of this closure report.

**2. Remaining material**

As stated in 07-TOD-026, *Submittal of Notification of Completion of Liquid Removal from Catch Tank 241-ER-311*, the evaporation of liquid from Catch Tank 241-ER-311 was completed and the ventilation system licenses under NOC\_ID 850 was shut down February 15, 2007.

**3. Assessment of potential continued emissions**

The 500 cfm portable exhauster (EU 50) and HEPA filter (EU 910) provided ventilation for liquid evaporation operations in Catch Tank 241-ER-311. There is no potential for any future emissions from NOC\_ID 850 operations because the evaporation process in Catch Tank 241-ER-311 has been completed. The ventilation system has been shut down since February 15, 2007.

However, the radial breather filter remains attached to the tank and is operated and sampled per EU 910 license requirements. The potential for future emissions from Catch Tank 241-ER-311 is reasonably believed to be zero based on review of the annual smear surveys. Sampling requirements of this emission unit shall remain the same.

**4. Future plans**

The three emission units will operate without NOC\_ID 850.

- EU 50, the portable exhauster (296-P-45), has been moved to T-111 and will operate under NOC ID 825.
- EU 486, 200 Area Diffuse/Fugitive, has no further requirements under NOC\_ID 850.
- EU 910, the HEPA filter (241-ER-311), remains connected to Catch Tank 241-ER-311 and operates as a passive breather filter.

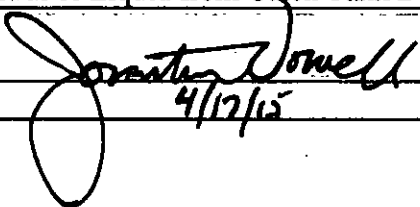
**5. Emissions control and monitoring**

Control and monitoring for:

- EU 50, the portable exhauster (296-P-45), will be monitored under NOC\_ID 825 and applicable requirements stated in the license.
- EU 486, 200 Area Diffuse/Fugitive, has no further requirements under NOC\_ID 850.
- EU 910, the HEPA filter (241-ER-311) continues to be sampled every 365 days, with an annual filter replacement.


Based on this report of closure, it is requested that the FF-01 license be revised such that NOC\_ID 850 is removed from emission units 50, 486, and 910.

**SIGNATURE**

Licensee Name: Department of Energy, Office of River Protection  
 Licensee Title: Removal of Liquid from Catch Tank 241-ER-311  
 Licensee Signature:   
 Date: 4/17/15

Attachment 2  
15-ECD-0020  
(1 Page)

Notification of Change Not Requiring Permit Revision

  
\_\_\_\_\_  
Dennis W. Bowser for

## 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):

<b>Description of the change:</b>
Close NOC_ID 850, "Removal of Liquid from Catch Tank 241-ER-311."  Basis: The project associated with NOC_ID 850 is complete and the ventilation system was shut down on February 15, 2007.
<b>Date of change:</b>
The closure date is the submittal date of this closure report.
<b>Describe the emissions resulting from the change:</b>
There is no anticipated change to the emissions.
<b>List any permit term or condition that will no longer be applicable as a result of the change:</b>
All NOC_ID 850 Conditions will be deleted from the FF-01 permit license for emission units 50, 486, and 910.

\* 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.