



11/18,318

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

14-ESQ-0118

OCT 09 2014

RECEIVED

OCT 16 2014

WA Dept of Health
Radioactive Air Emissions Section

Mr. J. Schmidt
Radiation Protection
State of Washington
Department of Health
309 Bradley Boulevard
Richland, Washington 99352

Dear Mr. Schmidt:

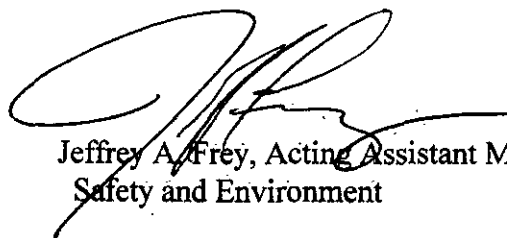
TRANSMITTAL OF REPORTS OF CLOSURE FOR WASTE SAMPLING AND CHARACTERIZATION FACILITY (WSCF) EMISSION POINTS: 696-W-1, 696-W-2, AND 600 J NONPOINT SOURCE (EMISSION UNITS: 62, 63, AND 504)

This letter transmits three "Reports of Closure" (Enclosures 1-3) in support of the WSCF emission points that will no longer operate and produce emissions of radioactive material. In accordance with Washington Administrative Code 246-247-080(6), "Report of Closure for Emission Point 696-W-1," "Report of Closure for Emission Point 696-W-2," and "Report of Closure of Emission Point 600.J Nonpoint Source" are being submitted to the State of Washington, Department of Health, to document cessation of radionuclide emitting activities. Emissions from WSCF analytical services and operations will cease on September 18, 2014.

We respectfully request a review and approval of the enclosed "Reports of Closure" in support of the WSCF closure action currently being implemented.

If you have any questions, please contact me, or your staff may contact Ed MacAlister, Director, Environmental, Safety and Quality Division, on (509) 372-0879.

Sincerely,



Jeffrey A. Frey, Acting Assistant Manager for
Safety and Environment

ESQ:DEJ

Enclosures

cc: See page 2.

NOC 820

Eu 62, 63, + 504

Mr. J. Schmidt
14-ESQ-0118

-2-

OCT 09 2014

cc w/encls:

G. Bohnee, NPT

P. K. Brockman, MSA

D. H. Butler, MSA

L. L. Fritz, MSA

P. M. Gent, Ecology

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R. A. Kaldor, MSA

J. B. Kon, MSA

K. Niles, OR Office of Energy

T. E. Sackett, MSA

Environmental Portal, LMSI

ENCLOSURE 1

REPORT OF CLOSURE FOR EMISSION POINT 696-W-1

License / ALARACT Revision Request

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

Submittal Date: _____

License Revision

WDOH Condition Number: _____

ALARACT Revision

New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: Report of Closure for Emission Point 696-W-1
Current NOC Application Number: AOP Permit 00-05-006/ License Number FF-01
WDOH EU ID Number: 600 S-6266-001, EUID: 62
Current WDOH Approval Letter Number(s): Air 12-303
WDOH NOC ID Number: 820

DESCRIPTION OF CHANGE

Number of Attachments: _____

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 Emission Unit 600 S-6266-001 (696-W-1)**

Background

In order to reduce infrastructure costs across the Hanford Site, the U.S. Department of Energy (DOE) Richland Operations Office (RL) has decided to close the Waste Sampling and Characterization Facility (WSCF) and remove the analytical services work scope from the Mission Support Alliance, LLC (MSA) Contract effective September 30, 2014. Offsite laboratories can provide these analytical services at significantly lower cost, resulting in savings that can be used to conduct additional cleanup work at Hanford.

The WSCF Analytical Laboratory (696-W-1) will be placed in an environmentally safe and regulatory compliant configuration. Specifically, the WSCF Analytical Laboratory is being placed in a minimal cost maintenance mode including cessation of ventilation. To eliminate the potential to emit for stack 696-W-1 the ventilation system will be altered with two positive physical actions: Electric cables feeding power to the fans will be disconnected and the exhaust

flow path will be interrupted by removing duct (expansion joint) and installing a blanking plate on fan inlets.

Purpose

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 from 696-W-1. This emission unit has been deactivated and isolated.

The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future plans
- Emissions control and monitoring

Date of closure

Emission Unit 696-W-1 has been deactivated and isolated and is no longer operational. The closure date will be September 18, 2014.

Remaining material

The remaining equipment (ducting, HEPA filters, fans, and the vertical discharge stack) was isolated to preclude its operation, prevent the intrusion of precipitation, and confine any remaining radiological contamination. The potential for radioactive air emissions will be eliminated by the physical controls of isolation and deactivation of the HVAC system from the environment. Isolation and deactivation will preclude any need for an active or passive ventilation system with emission control and/or monitoring devices.

Assessment of potential continued emissions

There is currently no potential for continued emissions from the 696-W-1 unit/stack. Operations will disable the exhaust and supply fans at the WSCF Laboratory to support decommissioning activities. Power will be removed from the fans and the exhaust fan inlets will be blanked off. Fuses will be removed for fan and damper controls. Specifically, conductors will be de-terminated at supply and exhaust fan motors; conductors will be de-terminated at motor stater/breaker for exhaust fan motors; metal plates will be installed to blank off exhaust fan inlets; fuses will be removed from control circuits in standby motor control center; fuses will be removed from Uninterrupted Power Supply (UPS) distribution panel.

Future plans

Emission Unit 696-W-1 will remain isolated until the necessary funding is authorized to proceed with removal and disposition and/or a decision has been made for repurpose.

Emissions control and monitoring

Engineering controls as described above eliminate the need for continued monitoring and/or emission controls. This stack will be added to the diffuse and fugitive table in FF-01 License until removal and disposition or repurpose. Free release surveys of ductwork and removal of filters would remove ductwork from diffuse and fugitive tables. The Hanford Site ambient air monitoring program will demonstrate compliance with WAC 246-247-040(5) and 060(5) for emissions limits for diffuse and fugitive sources.

Conclusion

Based on this report of closure, it is requested that emission unit 600 S-6266-001 (696-W-1) be removed from the Hanford Site Air Operating Permit (AOP Permit 00-05-006/ License Number FF-01).

ENCLOSURE 2

REPORT OF CLOSURE FOR EMISSION POINT 696-W-2

License / ALARACT Revision Request

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

Submittal Date: _____

License Revision

WDOH Condition Number: _____

ALARACT Revision

New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: Report of Closure for Emission Point 696-W-2

Current NOC Application Number: AOP Permit 00-05-006/ License Number FF-01

WDOH EU ID Number: 600 S-6266-002, EUID: 63

Current WDOH Approval Letter Number(s): Air 12-303

WDOH NOC ID Number: 820

DESCRIPTION OF CHANGE

Number of Attachments: _____

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 Emission Unit 600 S-6266-002 (696-W-2)**

Background

In order to reduce infrastructure costs across the Hanford Site, the U.S. Department of Energy (DOE) Richland Operations Office (RL) has decided to close the Waste Sampling and Characterization Facility (WSCF) and remove the analytical services work scope from the Mission Support Alliance, LLC (MSA) Contract effective September 30, 2014. Offsite laboratories can provide these analytical services at significantly lower cost, resulting in savings that can be used to conduct additional cleanup work at Hanford.

The WSCF Radiochemistry Laboratory (696-W-2) will be placed in an environmentally safe and regulatory compliant configuration. Specifically, the WSCF Radiochemistry Laboratory will cease all counting activities that warrant a controlled airspace within the building. Future use, from an administrative stand-point, could take place which would require the current heating,

ventilation and air conditioning (HVAC) system to operate. The HVAC system would only support occupancy and not analytical services.

Purpose

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 from 696-W-2. All current and future radiological sources with the potential to emit will be eliminated. No further analytical services would be conducted requiring a controlled airspace and abatement technology.

The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future plans
- Emissions control and monitoring

Date of closure

Emission Unit 696-W-2 has removed all low level radiological and chemical sample(s) and ceased counting activities and analysis that warrant a controlled airspace within the building. The closure date will be September 18, 2014.

Remaining material

Emission Unit 696-W-2 High-Efficiency Particulate Air (HEPA) filters will be surveyed (smear and direct) to confirm no residual radiological contamination exists in the system to support future non-radiological operations. The remaining equipment (ducting, HEPA filters, fans, and the vertical discharge stack) will continue to operate in support of future administrative occupancy.

Assessment of potential continued emissions

There is currently no potential for continued emissions from the 696-W-2 unit/stack. Analytical services conducted within the 696-W-2 airspace created no residual contamination that would warrant any potential continued emissions while the HVAC continues to operate in support of administrative activities.

Future plans

Emission Unit 696-W-2 will no longer be needed in support of analytical services.

Emissions control and monitoring

There is currently no potential for continued emissions from the 696-W-2 unit/stack. No emissions control and monitoring is necessary based on the HEPA filters surveys results that concluded no residual contamination was present.

Conclusion

Based on this report of closure, it is requested that emission unit 600 S-6266-002 (696-W-2) be removed from the Hanford Site Air Operating Permit (AOP Permit 00-05-006/ License Number FF-01).

ENCLOSURE 3

REPORT OF CLOSURE OF EMISSION POINT 600 J NONPOINT SOURCE

License / ALARACT Revision Request

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

Submittal Date: _____

License Revision

WDOH Condition Number: _____

ALARACT Revision

New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: Report of Closure for Emission Point "600 J Nonpoint Source"

Current NOC Application Number: AOP Permit 00-05-006/ License Number FF-01

WDOH EU ID Number: 600 Area Diffuse/Fugitive, EUID: 504

Current WDOH Approval Letter Number(s): Air 12-303

WDOH NOC ID Number: 820

DESCRIPTION OF CHANGE

Number of Attachments: _____

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 Emission Unit "600 J Nonpoint Source" (600 Area Diffuse/Fugitive)**

Background

In order to reduce infrastructure costs across the Hanford Site, the U.S. Department of Energy (DOE) Richland Operations Office (RL) has decided to close the Waste Sampling and Characterization Facility (WSCF) and remove the analytical services work scope from the Mission Support Alliance, LLC (MSA) Contract effective September 30, 2014. Offsite laboratories can provide these analytical services at significantly lower cost, resulting in savings that can be used to conduct additional cleanup work at Hanford.

WSCF will be placed in an environmentally safe and regulatory compliant configuration to support future repurposing and/or decommissioning activities. Under the purvey of Mission Support Alliance, all radionuclides requiring measurement(s) with the potential to emit will be removed and/or transferred for repurposing/disposition.

Purpose

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 from this minor, fugitive, non-point source emission unit (600 Area Diffuse/Fugitive). Emissions from WSCF analytical services and operations will cease.

The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future plans
- Emissions control and monitoring

Date of closure

Emission Unit "600 Area Diffuse/Fugitive" has ceased all radiological activities requiring fugitive emissions monitoring and testing through the Sitewide Ambient Monitoring Program. The closure date will be September 18, 2014.

Remaining material

All radiological material (i.e., source term, MLLW samples, LLW) associated with the analytical services provided by WSCF will either be removed and/or repurposed for a different work scope outside of the WSCF complex. Possible fugitive, non-point source emissions will be eliminated by dispositioning radionuclide inventory and operations. No potential of radioactive air emissions will exist nor the need for an active or passive ventilation system with emission control and/or monitoring devices.

Assessment of potential continued emissions

In support of analytical services provided by WSCF, each of the four (4) buildings 6267, 6269, 6265A, and 6266A detailed in this emission unit will have all radiological inventories removed to preclude any potential continued emissions. Portable Tanker(s) used for wastewater transport from WSCF to other facilities will be permanently eliminated from any operational support. No Portable Tanker(s) currently reside at WSCF.

Future plans

Emission Unit "600 Area Diffuse/Fugitive" will no longer be needed in support of analytical services and operations. Future repurposing will determine the need for any emission controls and/or monitoring devices.

Emissions control and monitoring

MSA near-facility monitoring (Sitewide Ambient Monitoring Program) and radiological surveys of waste containers and surrounding areas will not be necessary in support of WSCF analytical operations.

Conclusion

Based on this report of closure, it is requested that emission unit "600 J Nonpoint Source" (600 Area Diffuse/Fugitive) be removed from the Hanford Site Air Operating Permit (AOP Permit 00-05-006/ License Number FF-01).