



IM# 8,502

OFFICE OF RIVER PROTECTION

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

APR 16 2015

15-ECD-0019

RECEIVED

APR 22 2015

WA Dept of Health
Radioactive Air Emissions Section

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 LICENSE REVISION FORM FOR EMISSION UNITS 885 (296-P-49, POR 126) AND 886 (296-P-50, POR 127) CONTAINED IN THE HANFORD SITE AIR OPERATING PERMIT, PERMIT NUMBER 00-05-006, "THE DEPARTMENT OF ENERGY HANFORD SITE RADIOACTIVE AIR EMISSIONS LICENSE NUMBER FF-01"

The U.S. Department of Energy, Office of River Protection hereby submits the License/As Low As Reasonably Achievable Control Technology (ALARACT) Revision Request form to the Washington State Department of Health (WDOH) (Attachment 1). The License/ALARACT Revision Request form changes the stack height for the two subject emission units and has been reviewed by WDOH prior to transmittal.

Based on recent discussions with WDOH, the License/ALARACT Revision Request form is anticipated to be combined with one or two other license revisions and consolidated by WDOH. Attachment 2 contains the Notification of Change Not Requiring Permit Revision required by the Hanford Air Operating Permit and needs to be provided to the Washington State Department of Ecology.

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


Kevin W. Smith
Manager *For*

ECD:DWB

Attachments: (2)

cc: See page 2

EU 885 + 886
NOC 825

Mr. John Martell
15-ECD-0019

-2-

APR 16 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-0019
(1 Page)

License/ALARACT Revision Request



Dennis W. Bowser *for*

License/ALARACT Revision Request

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

Submittal Date: 04/16/2015

License Revision

WDOH Condition Number: _____

ALARACT Revision

New ALARACT Rev. #: _____

Report of Closure

PROJECT IDENTIFICATION

Project Title: W-296P049-001 (296-P-49 [POR126]) and W-296P050-001 (296-P-50 [POR127]) Portable Exhausters

Current NOC Application Number: N/A

WDOH EU ID Number: EU 885 and EU 886

Current WDOH Approval Letter Number(s): AIR-12-307

WDOH NOC ID Number: 825

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:

Emission Unit Information for both EU885 and EU886:

Current wording:

Stack Height: 28.00 ft. 8.53m.

Change to:

Stack Height: 50.00 ft. 15.24m.

SIGNATURE

Licensee Name: Department of Energy, Office of River Protection

Licensee Title: Hanford Site FF-01

Licensee


Signature: _____

Date: _____

[Handwritten Signature]
4/16/15

Attachment 2
15-ECD-0019
(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):

Description of the change:

W-296P049-001 (296-P-49 [POR126]) and W-296P050-001 (296-P-50 [POR127]) Portable Exhausters emission unit information for the stack height is not reflected correctly in the FF-01 License. The following is proposed for the emission unit information:
Stack Height: 50.00 ft. 15.24 m.

Date of change:

Anticipated to be spring calendar year 2015.

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:

Emission Unit Information:

Current wording:

Stack Height: 28.00 ft. 8.53m.

* 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.