



Department of Energy
Richland Operations Office
P.O. Box 550
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APR 02 2012

12-EMD-0057

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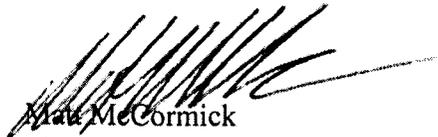
SUPPLEMENT TO DOE/RL-2011-27, HANFORD SITE AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION: COVERING THE PERIOD JANUARY 1, 2011, THROUGH DECEMBER 31, 2011 (DOE/RL-2012-04, REV. 0)

Enclosed is DOE/RL-2012-04, Supplement to DOE/RL-2011-27, "Hanford Site AOP Renewal Application: Covering the period January 1, 2011, through December 31, 2011." The AOP Renewal Application Supplement is being submitted in accordance with the requirements of Washington Administrative Code (WAC) 173-401-500(6) to supplement our previous submittal of the Hanford Site AOP Renewal Application.

The AOP Renewal Application Supplement is being submitted to ensure that the regulatory agencies have updated permitting documentation to support the planned issuance of a draft renewed Hanford Site AOP for public comment in Spring 2012, and is certified in accordance with WAC 173-401-520 by Scott L. Samuelson, Manager, U.S. Department of Energy Office of River Protection, and me, as the responsible officials as defined in WAC 173-401-200 (29)(c).

If you have any questions, please contact me, or your staff may contact Ray J. Corey, Assistant Manager for Safety and Environment, on (509) 376-0108.

Sincerely,


Matt McCormick
Manager

EMD:DEJ

Enclosure

cc: See Page 2

Addressees – Letter dated _____
12-EMD-0057

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Supplement to DOE/RL-2011-27, Hanford Site AOP Renewal Application: Covering the Period January 1, 2011 Through December 31, 2011

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

 U.S. DEPARTMENT OF **ENERGY** Richland Operations
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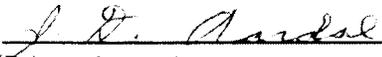
**Supplement to DOE/RL-2011-27, Hanford Site AOP Renewal
Application: Covering the Period January 1, 2011 Through
December 31, 2011**

T. G. Beam
Mission Support Alliance

Date Published
March 2012

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

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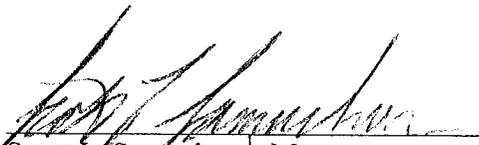
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CERTIFICATION FOR DOE/RL-2012-04
"SUPPLEMENT TO DOE/RL-2011-27, HANFORD SITE AIR OPERATING PERMIT
RENEWAL APPLICATION"

Certification:

In accordance with WAC 173-401-200(29)(c) as the responsible official, I certify, pursuant to WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information provided in DOE/RL-2012-04, *Supplement to DOE/RL-2011-27, Hanford Site Air Operating Permit Renewal Application: Covering the Period January 1, 2011 through December 31, 2011*, are true, accurate and complete.


Scott L. Samuelson¹, Manager
U.S. Department of Energy
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C. ADDITIONAL INFORMATION PROVIDED IN RESPONSE TO STATE OF WASHINGTON, DEPARTMENT OF HEALTH QUESTIONS ON FF-01 RENEWAL APPLICATION.....C-1

TERMS

| | |
|---------|--|
| ALARACT | As Low As Reasonably Achievable Control Technology |
| AOP | Air Operating Permit |
| CFR | <i>Code of Federal Regulations</i> |
| CVDF | Cold Vacuum Drying Facility |
| DOE | U.S. Department of Energy |
| DOH | State of Washington, Department of Health |
| Ecology | State of Washington, Department of Ecology |
| GHG | Greenhouse Gas |
| NOC | Notice of construction |
| PTE | Potential to Emit |
| WAC | <i>Washington Administrative Code</i> |
| WRAP | Waste Receiving and Processing Facility |

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1.0 INTRODUCTION

The Hanford Site Air Operating Permit (AOP), permit number 00-05-006, was initially issued to the U.S. Department of Energy (DOE) Hanford Operations by the State of Washington, Department of Ecology (Ecology) on June 20, 2001, with an effective date of July 2, 2001. The Hanford Site AOP was renewed (00-05-006 Renewal 1) effective January 1, 2007, with an expiration date of December 31, 2011. A complete AOP renewal application (DOE/RL-2011-27, *Hanford Site Air Operating Permit 2011 Renewal Application*) was submitted to Ecology in June 2011 and declared "complete" in August 2011. As a result, the existing Hanford Site AOP (00-05-006 Renewal 1) continues to be in effect until Ecology issues a new AOP. In accordance with *Washington Administrative Code (WAC) 173-401-500(6)* requirements, the renewal application will be supplemented until such time as Ecology issues a draft permit for public or affected state review. Ecology has not yet issued a draft AOP renewal for public review.

The original AOP renewal application (DOE/RL-2011-27) primarily contained information for the time period January 1, 2007, through December 31, 2010, although certain specified information was current through April 30, 2011. This renewal application supplement provides additional updated information through December 31, 2011 (certain specified information is current through February 2012).

This renewal application supplement was prepared in accordance with applicable requirements for an AOP application. It is compatible with the underlying regulatory requirements for quality assurance.

1.1 PURPOSE AND PROCESS

The purpose of this renewal application supplement is to inform affected regulatory agencies and the public of changes that have occurred since the submission of the original AOP renewal application (DOE/RL-2011-27).

For ease of comparison, the section and table numbers in this supplemental document directly correspond to those in the original AOP renewal application. Only revised or additional information to that provided in the original AOP renewal application is included in this document.

1.2 OVERVIEW OF AIR OPERATING PERMIT RENEWAL APPLICATION REQUIREMENTS

There are no changes to this section.

2.0 AIR OPERATING PERMIT RENEWAL APPLICATION REQUIREMENTS

Information to satisfy the primary AOP renewal application requirements is provided in the following sections.

2.1 CURRENT AIR OPERATING PERMIT NUMBER

There are no changes to this section.

2.2 AIR OPERATING PERMIT REVISIONS AND OFF-PERMIT CHANGES

Additions and changes to Table 2-1 of the original AOP renewal application (which covered the time period from January 1, 2007, through April 30, 2011) have been provided to reflect AOP revisions (i.e., significant modifications, minor modifications, and administrative amendments) and off-permit changes that have taken place during the supplemental period from May 1, 2011, through March 6, 2012. In addition, any changes not requiring a permit revision (WAC 173-401-722) that have been attached to the permit are included as informational data to ensure that a complete and accurate permit is issued by Ecology for the Hanford Site.

2.3 APPLICABLE/INAPPLICABLE REQUIREMENTS

2.3.1 Applicable Requirements

There are no changes to this section or Table 2-2.

2.3.2 Inapplicable Requirements

There are no changes to this section or Table 2-3.

2.4 INSIGNIFICANT EMISSION UNITS

There are no changes to Sections 2.4.1 through 2.4.5 or Table 2-4 through Table 2-7.

2.5 DIFFUSE AND FUGITIVE RADIOACTIVE EMISSION SOURCES

Except as addressed in the additional information provided in Appendix C, there are no changes to this section or Table 2-8.

2.6 FF-01 LICENSE RENEWAL APPLICATION REQUIREMENTS FOR RADIOACTIVE AIR EMISSION SOURCES

2.6.1 Summary of Emission Unit and Operational Status Information

Except as addressed in the additional information provided in Appendix C, there are no changes to this section or Table 2-9.

Table 2-1. Air Operating Permit Revisions and Off-Permit Changes that Occurred During the Permit Term. (5 Sheets)

| Type of Change | Letter | Letter Date | Description | Comment |
|--------------------------|---|-------------|---|---|
| Off-Permit Change | AIR 12-343 | 03/06/2012 | Renewal of Hanford Site Radioactive Air Emissions License #FF-01. | Effective date of FF-01 renewal was 02/23/2012 per DOH letter. |
| Administrative Amendment | 12-NWP-028 | 02/24/2012 | Removal of 300 E-1000 001 Emergency Backup Diesel Generator from the Air Operating Permit | Original Hanford Site request was submitted 12/15/2011 (12-AMRC-0035). Effective date of removal was 12/31/2011 per Ecology letter. |
| Off-Permit Change | AIR 12-203 | 02/08/2012 | Use of Portable Tanks and Revised Source Term Description at the Waste Sampling and Characterization Facility | Included as part of FF-001 renewal 28-day draft. |
| Off-Permit Change | AIR 12-203 | 02/08/2012 | Revisions to ALARACT Demonstrations 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 29, & 30 | Included as part of FF-01 renewal 28-day draft. Original Hanford Site revision request was submitted 11/28/2011 (11-ESQ-298). |
| Off-Permit Change | AIR 12-203 | 02/08/2012 | Construction and Operation of the Waste Receiving and Processing Facility (WRAP) | Included as part of FF-01 renewal 28-day draft. |
| Off-Permit Change | 12-NWP-012 | 02/06/2012 | 200W Sewage Lagoon Treatment System, Project L-691 | |
| Administrative Amendment | 12-NWP-009 (Reissued to replace incorrect letter 12-NWP-147) | 02/01/2012 | Permit Cancellation for EP-331-01-V Life Sciences Laboratory I [97NM-147] | This emission unit is eligible for the exemption at WAC 173-400-110(4)(f)(iv): Laboratory research, experimentation, analysis, and testing at sources whose primary purpose and activity is research or education. Effective date of permit cancellation was 09/30/2011 per Ecology letter. |
| Administrative Amendment | 12-NWP-007 | 01/30/2012 | Permit Amendment to Remove Requirement for a Lower Limit of Sulfur Content in #2 Diesel Fuel DE02NWP-001, Amendment 2 | This amendment does not constitute a modification subject to new source review under WAC 173-400. Initiated by Ecology to correct mistake in original approval order. |

Table 2-1. Air Operating Permit Revisions and Off-Permit Changes that Occurred During the Permit Term. (5 Sheets)

| Type of Change | Letter | Letter Date | Description | Comment |
|-------------------------------|--|---|---|--|
| Off-Permit Change | NA (Hand Delivered to DOH) | 12/14/2011 | 241-AZ Tank Farm Annulus Exhauster Operation | Included as part of FF-01 renewal 28-day draft. |
| Off-Permit Change | NA (Hand Delivered to DOH) | 12/14/2011 | Operation of the 242-A Evaporator Emission Unit 296-A-22 | Included as part of FF-01 renewal 28-day draft. |
| Off-Permit Change | NA (Hand Delivered to DOH) | 12/14/2011 | Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations | Included as part of FF-01 renewal 28-day draft. |
| Off-Permit Change | 11-ESQ-017 11-NWP-121 | 2/11/2011 11/30/2011 | Submittal of Hanford Facility Criteria and Toxics Air Emissions Notice of Construction (NOC) for the Operation of the 241-AP, 241-SY and 241-AY/AZ Tank Farm Ventilation System Upgrades | Ecology approval still pending. Ecology requested additional information on 03/17/2011 (11-NWP-014). Hanford Site provided requested data on 04/27/2011 (11-ESQ-091). |
| Off-Permit Change | AIR 11-1105 | 11/18/2011 | Construction and Operation of the Cold Vacuum Drying Facility (CVDF). | Effective date of changes was 11/4/2011 per DOH letter. |
| Change Not Requiring Revision | 12-AMRC-0024 | 11/17/2011 | Updated Notification of Change Not Requiring Permit Revision for 385 Building Emergency Backup Diesel Engine-Driven Fire-Water Pump | Provides notification that actual pump installed was a different model than identified in original notification to Ecology on 02/28/2011 (11-AMRC-0095). |
| Off-Permit Change | AIR 11-1104 | 11/10/2011 | Canister Storage Building, Building 221-H | Effective date of changes was 11/4/2011 per DOH letter. |
| Closure | AIR 11-1102 | 11/04/2011 | Closeout of Emission Units 296-P-28 (EU 54), 296-A-27 (EU 150), 296-C-6 (EU 236), Air Rotary Drilling (EU 539), Air Hammer Drilling (EU 541), and 244-CR Vault Passive Filter B (EU 714) | DOE closure request submitted via 11-ESQ-241 on 09/23/2011. |

Table 2-1. Air Operating Permit Revisions and Off-Permit Changes that Occurred During the Permit Term. (5 Sheets)

| Type of Change | Letter | Letter Date | Description | Comment |
|--------------------------|-------------|-------------|--|--|
| Off-Permit Change | AIR 11-1006 | 10/28/2011 | Operation of the Transuranic Waste Retrieval Project (NOC 804) | Effective date of changes was 10/19/2011 per DOH letter. This NOC obsoletes previous NOCs 719 and 795. |
| Administrative Amendment | 11-NWP-119 | 10/18/2011 | Request for Expedited Amendment to DE 02NWP-001 to Incorporate 40 CFR 63.6640(f)(2) for Operation of 325 and 331 Building Generators as Emergency Stationary RICE | Effective date of changes was 10/14/2011 per Ecology letter. Hanford Site amendment request was submitted on 10/12/2011 (12-EMD-0005). |
| Off-Permit Change | AIR 11-1004 | 10/18/2011 | Operation of New Ventilation Systems in AN and AW Tank Farms | Effective date of changes was 10/10/2011 per DOH letter. |
| Off-Permit Change | AIR 11-919 | 09/30/2011 | 241-AY/AZ Tank Farm Ventilation System Upgrades Installation and Pre-Operational Permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" | Effective date of changes was 09/26/2011 per DOH letter. |
| Off-Permit Change | AIR 11-918 | 09/30/2011 | 241-AP Tank Farm Ventilation System Upgrades Installation and Pre-Operational Permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" | Effective date of changes was 09/26/2011 per DOH letter. |
| Off-Permit Change | AIR 11-917 | 09/30/2011 | 241-AY/AZ Tank Farm Ventilation System Upgrade Operational Permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" | Effective date of changes was 09/26/2011 per DOH letter. |

Table 2-1. Air Operating Permit Revisions and Off-Permit Changes that Occurred During the Permit Term. (5 Sheets)

| Type of Change | Letter | Letter Date | Description | Comment |
|-------------------|------------|-------------|--|--|
| Off-Permit Change | AIR 11-916 | 09/30/2011 | 241-A Tank Farm Ventilation System Upgrade Operational Permit for "Radioactive Air Emission NOC for 241-SY, 241-AP, and 241-AZ Tank Farm Ventilation System Upgrade" | Effective date of changes was 09/26/2011 per DOH letter. |
| Off-Permit Change | AIR 11-915 | 09/30/2011 | 241-SY Tank Farm Ventilation System Upgrade Operational Permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241-AZ Tank Farm Ventilation System Upgrade" | Effective date of changes was 09/26/2011 per DOH letter. |
| Off-Permit Change | AIR 11-914 | 09/30/2011 | 241-SY Tank Farm Ventilation System Upgrades Installation and Pre Operational Permit for 241-SY/AP/AZ Tank Farm Exhauster Upgrade | Effective date of changes was 09/26/2011 per DOH letter. |
| Closure | 11-ESQ-241 | 09/23/2011 | Notification of Closure of Emission Units P-296-P028-001, P-296AW-001, C-106 Sluicing, P-Vadose-002, P-Vadose-003 and P-244CR-003 | |
| Closure | 11-ESQ-240 | 09/23/2011 | Notification of Closure of Non-Radioactive Notices of Construction DE00NWP-001, DE03NWP-001, and 97NM-001 | |
| Off-Permit Change | AIR 11-809 | 08/23/2011 | Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations | Effective date of changes was 08/11/2011 per DOH letter. |

Table 2-1. Air Operating Permit Revisions and Off-Permit Changes that Occurred During the Permit Term. (5 Sheets)

| Type of Change | Letter | Letter Date | Description | Comment |
|-------------------|---|--|---|--|
| Off-Permit Change | AIR 11-808 | 08/23/2011 | J-318 Fugitive Emissions from the 318 Building (Radiological Calibrations Laboratory) | Effective date of changes was 08/11/2011 per DOH letter. |
| Off-Permit Change | 11-EMD-0030 <u>AIR 11-705</u> | 02/17/2011 <u>07/22/2011</u> | Life Sciences Laboratory – 1 (331 Bldg.), Revision 2. | Original Hanford Site revision request was submitted on 02/17/2011 (11-EMD-0030) |
| Off-Permit Change | AIR 11-704 | 07/07/2011 | Conducting General Laboratory Processes Research Activities in the 325 Building, Revision 2 | |
| Off-Permit Change | AIR 11-401 <u>AIR-11-502</u> | 04/01/2011 <u>05/11/2011</u> | Tank Farm ALARACT Demonstration for Installation/Operation/Removal of Push Mode Core Sampling Equipment (ALARACT 2) | |
| Off-Permit Change | AIR 10-1007 | 10/04/2010 | Liquid Pumping and Enhanced Sluicing on Tank 241-C-106 (NOC ID 790) | DOH is no longer working on this application per request from Hanford Site staff. Emission unit and all NOCs were closed via <u>11-ESQ-240</u> and <u>11-ESQ-241</u> , both sent <u>09/23/2011</u> . |

2.6.2 Status of Facility Compliance

The Hanford Site is required to report the status of compliance with the standards in WAC 246-247-040 in the renewal application. Table 2-10 has been updated to identify the calendar year 2011 compliance demonstration documentation.

Table 2-10. Compliance Demonstration Documentation.

| Calendar Year | Annual Radionuclide Air Emissions Report | AOP Annual Compliance Certification Report | AOP Semiannual Reports |
|---------------|---|---|---|
| 2011 | DOE/RL-2012-19 (will be issued in June 2012) | DOE/RL-2012-09 (will be issued in June 2012) | DOE/RL-2011-09 (January through June 2011) DOE/RL-2012-08 (July through December 2011) |

2.6.3 Status of Corrective Actions

There are no changes to this section or Table 2-11.

3.0 MISCELLANEOUS REQUESTED PERMIT CHANGES

3.1 ATTACHMENT 1 – ECOLOGY PERMIT

3.1.1 Modifications to Air Operating Permit Attachment 1 Table 1.1, List of Significant Emission Units.

During the term of the current Hanford Site AOP, several Significant Emission Units have been permanently deactivated. Additional changes to Table 3-1 are provided below to reflect the supplemental period changes necessary to permanently remove these units from Attachment 1, Table 1.1, List of Significant Emission Units. Corresponding changes to Attachment 1, Table 1.6 will also be required.

Table 3-1. Deactivated Emission Units to be Removed from Air Operating Permit Attachment 1 Table 1.1. (2 Sheets)

| Emission Unit | Requirements | Description |
|---------------------------|---|-------------|
| 222-S, Boilers 1 & 2 | 200 HP fuel oil boilers permanently shutdown prior to October 2011 (formal DOE notification to Ecology pending). | |
| 320, Boilers 1 & 2 | 100 HP natural gas boilers permanently shutdown June 2011 (per DOE 06/17/2011 letter 11-EMD-0070). | |
| 326, Boilers 1 & 2 | 100 HP natural gas boilers permanently shutdown prior to October 2011 (formal DOE notification to Ecology pending). | |
| 329, Boilers 1, 2, 3, & 4 | 50 HP natural gas boilers permanently shutdown prior to October 2011 (formal DOE notification to Ecology pending). | |

Table 3-1. Deactivated Emission Units to be Removed from Air Operating Permit Attachment 1 Table 1.1. (2 Sheets)

| Emission Unit | Requirements | Description |
|-------------------|---|-------------|
| 382-A-D, Boiler 1 | 200 HP natural gas boiler permanently shutdown prior to November 2011 (formal DOE notification to Ecology pending). | |

3.1.2 Modifications to Air Operating Permit Attachment 1 Table 1.3, Emission Limits and Periodic Monitoring Requirements for Steam Generating Units

To reflect the changes to Table 1.1 of Attachment 1, permanently deactivated steam generating units deactivated during the supplemental period also need to be removed from Table 1.3 of the current AOP. These additional changes are reflected in Table 3-2.

Table 3-2. Deactivated Steam Generating Units to be Removed from Air Operating Permit Attachment 1, Table 1.3.

| Boiler Annex | Unit | >5 mmBTU/hr input | Fuel |
|--------------|---|-------------------|------|
| 222-S | Boilers 1 & 2 permanently shutdown prior to October 2011. | | |
| 320 | Boilers 1 & 2 permanently shutdown in June 2011. | | |
| 326 | Boilers 1 & 2 permanently shutdown prior to October 2011. | | |
| 329 | Boilers 1, 2, 3 & 4 permanently shutdown prior to October 2011. | | |
| 382-A-D | Boiler 1 permanently shutdown prior to November 2011. | | |

3.1.3 Modifications to Air Operating Permit Attachment 1 Table 1.4, Internal Combustion Engines: 500 Horsepower and Greater

There are no changes to this section or Table 3-3.

3.1.4 Proposed Changes to Attachment 1, Section 2.1

There are no changes to this section.

3.2 ATTACHMENT 2 – RADIOACTIVE AIR EMISSIONS LICENSE, FF-01

There are no changes to Sections 3.2.1 through 3.2.3.

3.3 ATTACHMENT 3 – BENTON CLEAN AIR AGENCY

There are no changes to this section or Section 3.3.1.

3.4 NEWLY REGULATED STATIONARY ENGINES

Table 3-4 below identifies two additional Hanford Site stationary engines that are potentially subject to either 40 CFR 63 Subpart ZZZZ, 40 CFR 60 Subpart IIII, and/or 40 CFR 60 Subpart JJJJ.

Table 3-4. Non-Permitted Stationary Engines Less-Than 500 Horsepower.

| Stationary Engine Location | HP | Model Year | Usage | Fuel Type | Potentially Applicable Regulation(s) | Compliance Date |
|----------------------------|------|------------|-----------------------------|-----------|--------------------------------------|-----------------|
| 200 West Area (MO646) | 31.5 | 2005 | Non-Emergency | Diesel | 40 CFR 63 Subpart ZZZZ | 05/03/2013 |
| 400 Area | 175 | 1974 | Emergency Backup, Fire Pump | Diesel | 40 CFR 63 Subpart ZZZZ | 05/03/2013 |

3.5 ALTERNATIVE APPROVALS

Table 3-5 below provides a list of additional approvals issued by appropriate regulatory agencies as “alternatives” to applicable 40 CFR 61 Subpart H and WAC 246-247 requirements for specified radioactive air emission units on the Hanford Site. These alternative approvals are in addition to Table 3-5 included in the original AOP renewal application.

Table 3-5. Radioactive Air Emissions “Alternative” Approvals.

| Emission Unit | Approved Method Description | Approval Documentation |
|---|--|---|
| 486 (200 Areas Diffuse/Fugitive [Near Facility Monitoring]) | Alternative Monitoring Approval for 200 Area Diffuse/Fugitive major emission unit (EU 486) | AIR 02-0503, dated 05/09/2002 |
| 1322 (Portable Enclosure System #1) | Alternative Approval for Destructive Examination (Condition #8) | AIR 11-1006, dated 10/28/2011 (changes effective on 10/19/2011) |
| 1327 (Next Generation Retrieval) | Alternative Approval for Destructive Examination (Condition #9) | AIR 11-1006, dated 10/28/2011 (changes effective on 10/19/2011) |

4.0 REFERENCES (ADDITIONAL)

- 11-EMD-0070, 2011, "Hanford Site Air Operating Permit (AOP) Number 00-05-006, Renewal 1," (Letter to J. A. Hedges, State of Washington, Department of Ecology), from S. R. Weil, U.S. Department of Energy, Richland Operations Office, Richland, Washington, June 17.
- 11-ESQ-240, 2011, "U.S. Department of Energy (DOE), Office of River Protection (ORP) Notification of Closure of Non Radioactive Notices of Construction DE00NWP-001, DE03NWP-001, and 97NM-001 in the Hanford Site Air Operating Permit (AOP), Permit Number 00-05-006," (Letter to J. A. Hedges, Washington State Department of Ecology), from S. L. Samuelson, U.S. Department of Energy, Office of River Protection, Richland, Washington, September 23.
- 11-ESQ-241, 2011, "U.S. Department of Energy (DOE), Office of River Protection (ORP) Submittal of Closure Reports for Six Emission Units in the Hanford Site Air Operating Permit (AOP), Permit Number 00-05-006/License Number FF-01," (Letter to J. Martell, Washington State Department of Health), from S. L. Samuelson, U.S. Department of Energy, Office of River Protection, Richland, Washington, September 23.
- 11-NWP-119, 2011, "Re: Modification to Approval Order DE02NWP-001," (Letter to R. Corey, U.S. Department of Energy, Richland Operations Office), from R. Skinnarland, State of Washington Department of Ecology, Richland, Washington, October 18.
- 11-NWP-121, 2011, "Re: Approval of Criteria and Toxic Air Emissions Notice of Construction (NOC) Application for the Operation of the 241-AP, 241-SY and 241-AY/AZ Tank Farm Ventilation System Upgrades (Approval Order DE11NWP-001)," (Letter to S. L. Samuelson, U.S. Department of Energy, Office of River Protection), from J. A. Hedges, State of Washington, Department of Ecology, Richland, Washington, November 30.
- 11-PRO-0398, 2011, "Contract No. DE-AC06-97RL13184 – 329 and 326 Boiler Annexes," (Letter to J. G. Burrell, Johnson Controls, Inc.), from R. D. Walter, U.S. Department of Energy, Richland Operations Office, Richland, Washington, August 12.
- 12-AMRC-0035, 2011, "300 E-1000 001 Emergency Backup Diesel Generator Notification of Permanent Shutdown," (Letter to J. A. Hedges, State of Washington, Department of Ecology), from R. J. Corey, U.S. Department of Energy, Richland Operations Office, Richland, Washington, December 15.
- 12-NWP-007, 2012, "Re: Approval Order No. DE02NWP-001 Non-Radioactive Air Emission Notice of Construction for Installation and Operation of Emergency Diesel Generators in the 300 Area of Hanford for the United States Department of Energy-Richland, January 15, 2002," (Letter to R. Corey, U.S. Department of Energy, Richland Operations Office), from R. Skinnarland, State of Washington, Department of Ecology, Richland, Washington, January 30.

- 12-NWP-009, 2012, "Re: Voiding of the Life Sciences Laboratory Approval Order 97NM-147," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from R. Skinnerland, State of Washington, Department of Ecology, Richland, Washington, February 1.
- 12-NWP-012, 2012, "Re: Order of Approval for Notice of Construction Application, 200 West Evaporative Sewage Lagoon (Project L-691)," (Letter to R. J. Corey, U.S. Department of Energy, Office of River Protection), from J. A. Hedges, State of Washington, Department of Ecology, Richland, Washington, February 6.
- 12-NWP-028, 2012, "Re: Removal of 300 E-1000 001 Emergency Backup Diesel Generator from Air Operating Permit," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from Ron Skinnerland, State of Washington, Department of Ecology, Richland, Washington, February 24.
- 40 CFR 60, "Standards of Performance for New Stationary Sources," Title 40, *Code of Federal Regulations*, Part 60, as amended.
- 40 CFR 63, "National Emission Standards for Hazardous Air Pollutants for Source Categories," Title 40, *Code of Federal Regulations*, Part 63, as amended.
- AIR 10-1007, 2010, "Liquid Pumping and Enhanced Sluicing on Tank 241-C-106 (NOC 790; EU 486 & 498)," (Letter to D. Brockman, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, October 4.
- AIR 11-502, 2011, "Tank Farm ALARACT Demonstration for Installation/Operation/Removal of Push Mode Core Sampling Equipment (ALARACT 2)," (Letter to J. A. Dowell, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, May 11.
- AIR 11-704, 2011, "Radiochemical Processing Laboratory (325 Building), Revision 2, 300 Area, Hanford Site, Richland, Washington (NOC 807, EU 361)," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from J. Martell, State of Washington, Department of Health, Richland, Washington, July 7.
- AIR 11-705, 2011, "Life Sciences Laboratory – 1 (331 Building), Revision 2, 300 Area, Hanford Site, Richland, Washington (NOC 808, EU 412)," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from J. Martell, State of Washington, Department of Health, Richland, Washington, July 22.
- AIR 11-808, 2011, "J-318 Fugitive Emissions from the 318 Building (Radiological Calibrations Laboratory), 300 Area, Hanford Site (NOC 815, EU 1333)," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from J. Martell, State of Washington, Department of Health, Richland, Washington, August 23.
- AIR 11-809, 2011, "Categorical Tank Farm Facility Waste Retrieval and Closure: Phase II Waste Retrieval Operations (NOC 816; EU 50, 57, 58, 486, 498, 749, 885, 886, 1293, 1334, & 1343)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, August 23.

- AIR 11-914, 2011, "241-SY Tank Farm Ventilation System Upgrades Installation and pre operational permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" (NOC 805; EU 486)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, September 30.
- AIR 11-915, 2011, "241-SY Tank Farm Ventilation System Upgrade operational permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" (NOC 817; EU 1335 & 1342)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, September 30.
- AIR 11-916, 2011, "241-AP Tank Farm Ventilation System Upgrade operational permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" (NOC 818; EU 1328 & 1329)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, September 30.
- AIR 11-917, 2011, "241-AY/AZ Tank Farm Ventilation System Upgrade operational permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" (NOC 819; EU 1330 & 1331)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, September 30.
- AIR 11-918, 2011, "241-AP Tank Farm Ventilation System Upgrades Installation and pre operational permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" (NOC 823; EU 486)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, September 30.
- AIR 11-919, 2011, "241-AY/AZ Tank Farm Ventilation System Upgrades Installation and pre operational permit for "Radioactive Air Emissions NOC for 241-SY, 241-AP, and 241 AY/AZ Tank Farm Ventilation System Upgrade" (NOC 832; EU 486)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, September 30.
- AIR 11-1004, 2011, "Operation of New Ventilation Systems in AN and AW Tank Farms. (Replaced NOC ID 802) (NOC 809; EU 735, 736, 855, & 856)," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, October 18.
- AIR 11-1006, 2011, "Operation of the Transuranic Waste Retrieval Project (Replaces NOC 719) (NOC 804; EU 455, 486, 755, 756, 1181, 132, 1326, & 1327)," (Letter to R. J. Corey, DOE-ORP), from J. Martell, State of Washington Department of Health, Richland, Washington, October 28.

- AIR 11-1102, 2011, "Closeout of Inspection (Audit 747) for Closeout of Emission Units," (Letter to S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, November 4.
- AIR 11-1104, 2011, "Container Storage Building, 212-H (Replaces NOC 652) (NOC 835; EU 435)." (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from J. Martell, State of Washington, Department of Health, Richland, Washington, November 10.
- AIR 11-1105, 2011, "Construction and Operation of the Cold Vacuum Drying Facility (CVDF) (Replaces NOC 643) (NOC 836; EU 436)," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office), from J. Martell, State of Washington, Department of Health, Richland, Washington, November 18.
- AIR 12-203, 2012, "USDOE FF-01 Renewal License, All Emission Units," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office and S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, February 8.
- AIR 12-343, 2012, "USDOE FF-01 Renewal License, All Emission Units," (Letter to R. J. Corey, U.S. Department of Energy, Richland Operations Office and S. Samuelson, U.S. Department of Energy, Office of River Protection), from J. Martell, State of Washington, Department of Health, Richland, Washington, March 6.
- DOE/RL-2011-09, 2011, *Hanford Site Air Operating Permit Semiannual Report for the Period January 1, 2011 through June 30, 2011*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- DOE/RL-2011-27, 2011, *Hanford Site Air Operating Permit 2011 Renewal Application*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- DOE/RL-2012-08, 2012, *Hanford Site Air Operating Permit Semiannual Report for the Period July 1, 2011 through December 31, 2011*, Rev. 0, U.S. Department of Energy, Richland Operations Office, Richland, Washington.
- Resource Conservation and Recovery Act of 1976, 42 USC 6901, et seq.
- WAC 173-400, "General Regulations for Air Pollution Sources," *Washington Administrative Code*, Olympia, Washington.
- WAC 173-401, "Operating Permit Regulation," *Washington Administrative Code*, Olympia, Washington.

APPENDIX A

SUMMARY OF EMISSION UNIT AND OPERATIONAL STATUS INFORMATION

Except as addressed in the additional information provided in Appendix C, there are no changes to Appendix A as presented in the original AOP renewal application.

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APPENDIX B**GREENHOUSE GAS POTENTIAL-TO-EMIT CALCULATIONS****B.1 GHG POTENTIAL TO EMIT (PTE) ESTIMATES**

Two additional engines, represented in Table B-1 below, have been added to the greenhouse gas (GHG) calculations performed in the original AOP renewal application (DOE/RL-2011-27). The resulting additional engine emissions have been added to the maximum annual potential-to-emit (PTE) of GHGs from Hanford Site sources identified in the original AOP renewal application with the new maximum PTE identified in Table B-2 below.

Table B-1. Stationary Combustion Source Greenhouse Gas Emission Calculation Data.

| Engine/Source | Fuel Type | Maximum Fuel Consumption Rate | Maximum Annual Operating Hours | Maximum Annual Fuel Consumption |
|-----------------------------|------------------|--------------------------------------|---------------------------------------|--|
| 200 West Area (MO646) | Diesel #2 | 1.4 gal/hr | 8,760 | 12,264 gal |
| 400 Area (Emergency Engine) | Diesel #2 | 10 gal/hr | 100 | 1,000 gal |

The total revised Hanford Site GHG PTE is summarized in Table B-2 below.

Table B-2. Total Hanford Site GHG Emissions Potential to Emit (PTE) (metric tons CO₂e/year).

| | Combined CO₂e |
|--------------------------------|---------------------------------|
| Stationary Combustion Sources | 270,800.29 |
| Municipal solid waste landfill | 15,331.44 |
| Total | 286,131.73 |

B.2 ASSUMPTIONS

There are no changes to the assumptions presented in the original AOP renewal application.

B.3 EXAMPLE GHG EMISSIONS CALCULATIONS

There are no changes to the method of GHG calculations presented in the original AOP renewal application.

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APPENDIX C

**ADDITIONAL INFORMATION PROVIDED IN RESPONSE TO STATE OF
WASHINGTON, DEPARTMENT OF HEALTH QUESTIONS
ON FF-01 RENEWAL APPLICATION**

This appendix contains a copy of the October 31, 2011 email and attachments transmitted to the State of Washington, Department of Health (DOH) from Thomas G. Beam, Hanford Site AOP/FF-01 Program Manager, in response to questions raised by DOH staff during review of the AOP/FF-01 renewal application.

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Beam, Thomas G

From: Beam, Thomas G
Sent: Monday, October 31, 2011 11:03 AM
To: Schmidt, John; McCormick, Ernest; Utley, Randell; Martell, John; Berven, Shawna
Cc: 'zhen.davis@epamail.epa.gov'; Rasmussen, James E; Jackson, Dale E.; Bowser, Dennis W; 'THERESA.ALDRIDGE@PNSO.SCIENCE.DOE.GOV'; Bates, John A; Penn, Lucinda L; Bowers, Holly M; Barnett, Matthew; Woolard, Joan G; Beam, Thomas G; Peterson, Kirk A; Weil, Stephen; Stephenson, Michael J; Landon, Roger J
Subject: RE: Additional Information in Response to DOH questions on FF-01 Renewal Application
Attachments: RE: FF-01 Renewal information; AOP Renewal Re: MASF & FFTF; RE: Emission Units Not Being Closed for FF-01 Renewal; Closure Information Regarding 1706KE, -KEL, and -KER; DOH Additional Info--EU and NOC Closure Documentation Status.docx

John,

In response to DOH's questions and request for additional information as outlined below for the FF-01 renewal application, the following information (including attachments) is provided as a consolidated information package on behalf of DOE and Hanford Site contractors. Please note that some of the attached emails are referenced in the text below, while others are referenced within the text of the attached Word file that contains most of the additional information being provided in response to your questions below.

1. Closure reports are needed for those emission units and Notice of Construction approvals marked in your renewal as being closed. Please provide a schedule detailing when these submittals will be completed.
 Table 1 (emission units) and Table 2 (NOCs) in the attached Word file "DOH Additional Info—EU and NOC Closure Documentation Status.docx" contain additional information on the status of closure documentation for emission units and NOCs identified in Table 2-9 and Appendix A of the renewal application as being proposed for closure/deletion.
2. EU 93 (296-A-42) is a major stack. Supporting documentation to allow intermittent operation will need to be submitted. This may result in additional conditions of operation.
 Although the Hanford Site did propose language changes to the Operational Status description for EU 93 that would reflect an ability to operate intermittently instead of continuously, we have subsequently re-evaluated our initial proposal and determined that we do not wish to pursue this revision at this time. We request that DOH ignore the proposed Operational Status language change for EU 93 and retain the existing Operational Status description in the renewed FF-01. We apologize for any confusion or inconvenience this may have caused DOH staff.
3. EU 385 (437-MN&T) Operational Status change looks to be a change in operation of the emission unit process which may trigger a modification. Please provide documentation to support the change.
 Per the attached email "AOP Renewal Re: MASF & FFTF", dated 7/25/2011, DOE notified DOH in response to questions raised at a technical exchange meeting with CHPRC that the textual changes to the Operational Status language for FFTF and MASF emission units in the FF-01 renewal application did not represent operational changes, but were simply intended to reflect changes in operational responsibility within the CHPRC organizational structure. No changes have occurred which would trigger a need to modify the emission unit license.
4. EU 399 (437-1-61) Operational Status change looks to be a change in operation of the emission unit process. If this is the case please provide documentation to support the change.
 Per the attached email "AOP Renewal Re: MASF & FFTF", dated 7/25/2011, DOE notified DOH in response to questions raised at a technical exchange meeting with CHPRC that the textual changes to the Operational Status language for FFTF and MASF emission units in the FF-01 renewal application did not represent operational changes, but were simply intended to reflect changes in operational responsibility within the CHPRC organizational structure. No changes have occurred which would trigger a need to modify the emission unit license.
5. EU 714 (244-CR Vault Passive Filter B) was not installed and when documentation is received it will be removed from the license.

DOE-ORP submitted a report of closure for this EU to DOH on September 23, 2011 (Letter 11-ESQ-241, "U. S. Department of Energy (DOE), Office of River Protection (ORP) Submittal of Closure Reports for Six Emission Units in the Hanford Site Air Operating Permit (AOP), Permit Number 00-05-006/License Number FF-01).

6. EU 735 (296-A-44) please verify Cm-244 is a radionuclide requiring measurement and provide documentation. Per the attached email "RE: FF-01 Renewal information", dated 8/12/2011, DOH concurred that no additional information to address this question is required at this time. This issue was addressed as part of DOH's approval of NOC ID 802 on 4/14/2011 (AIR 11-404).
7. EU 736 (296-A-45) please verify Cm-244 is a radionuclide requiring measurement and provide documentation. Per the attached email "RE: FF-01 Renewal information", dated 8/12/2011, DOH concurred that no additional information to address this question is required at this time. This issue was addressed as part of DOH's approval of NOC ID 802 on 4/14/2011 (AIR 11-404).
8. EU 1176 (FFTF PTRAEU's) documentation (NOC revision form) needs to be submitted to support closure of the emission unit and removal from the NOC ID 776.
Although the Hanford Site did propose/request deletion and subsequent closure of EU 1176 as part of the FF-01 renewal application (as well as its removal from being linked with NOC ID 776), we have subsequently re-evaluated our initial request and determined that we do not wish to close this emission unit at this time. We request that DOH ignore our request to delete/close EU 1176 "FFTF PTRAEU's" and retain it in the renewed FF-01 as-is. We apologize for any confusion or inconvenience this may have caused DOH staff. It is noted that the designation of "NONE" under the Abatement Technology section of the license likely needs to be revised to "BARCT" for consistency with other entries in the FF-01.
9. EU (Multiple) closure reports and documentation supporting name changes are needed for requested changes in Enclosure 2, Table 2-1.
Table 3 in the attached Word file "DOH Additional Info—EU and NOC Closure Documentation Status.docx" contains additional information on the status of closure documentation and supporting information for proposed changes identified in Table 2-8 of the renewal application (which corresponds to Enclosure 2, Table 2-1 of the current FF-01) for minor diffuse and fugitive emission units.

We would also request the opportunity for further discussion regarding the DOH position on the definition of "annual" prior to issuance of formal correspondence documenting your stated position. We believe our request is simply "memorializing" guidance/clarification that has already consistently been provided to site personnel for a number of years by the regulatory agencies and which is reflected in contractor operating procedures. We do not believe this is an "alternative approval" situation. There is no formal definition of "annual" that stipulates an exact period of 12 months and thus, DOH would not be granting a global approval by "memorializing" existing guidance.

The changes to the identified stack dimensions for EU 63 are reasonable given the constraints of DOH's permitting database, as are the associated textual changes to the "Operational Status" language for EU 63. In addition, DOH's intended replacement of the current text "NONE" with a reference to the appropriate control standard "BARCT" in the Abatement Technology section of EUs 439, 448, 454, 461, 465, 472 and 473 is also a reasonable change to ensure consistency within the FF-01.

I apologize for the extended delay in providing the requested information. If you have any questions, wish to discuss further or need to request additional information in support of the FF-01 renewal effort, please feel free to contact me at your convenience. Thanks.

Tom Beam
Hanford Site FF-01/AOP Program Manager
MSA Environmental Integration
376 4876

From: Schmidt, John W (DOH) [mailto:John.Schmidt@doh.wa.gov]
Sent: Friday, August 12, 2011 10:11 AM
To: Schmidt, John; Rasmussen, James E; Bates, John A; Beam, Thomas G; Penn, Lucinda L; Doss, Shelly D; Bowser, Dennis W

Cc: Martell, John; Berven, Shawna D (DOH); Utley, Randell J (DOH); McCormick, Ernest R (DOH); zhen.davis@epamail.epa.gov
Subject: RE: FF-01 Renewal Information

The department needs additional information to complete the license renewal process is in response to your request for the FF-01 renewal (DOE/RL-2011-27, Rev. 0). The additional information needed is detailed as follows:

10. Closure reports are needed for those emission units and Notice of Construction approvals marked in your renewal as being closed. Please provide a schedule detailing when these submittals will be completed.
11. EU 93 (296-A-42) is a major stack. Supporting documentation to allow intermittent operation will need to be submitted. This may result in additional conditions of operation.
12. EU 385 (437-MN&T) Operational Status change looks to be a change in operation of the emission unit process which may trigger a modification. Please provide documentation to support the change.
13. EU 399 (437-1-61) Operational Status change looks to be a change in operation of the emission unit process. If this is the case please provide documentation to support the change.
14. EU 714 (244-CR Vault Passive Filter B) was not installed and when documentation is received it will be removed from the license.
15. EU 735 (296-A-44) please verify Cm-244 is a radionuclide requiring measurement and provide documentation.
16. EU 736 (296-A-45) please verify Cm-244 is a radionuclide requiring measurement and provide documentation.
17. EU 1176 (FFTF PTRAEU's) documentation (NOC revision form) needs to be submitted to support closure of the emission unit and removal from the NOC ID 776.
18. EU (Multiple) closure reports and documentation supporting name changes are needed for requested changes in Enclosure 2, Table 2-1.

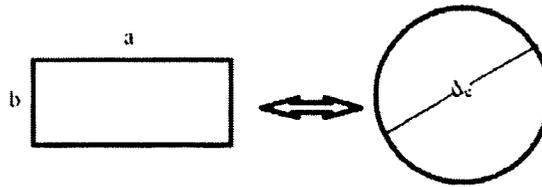
In addition, in section 3.2.1 of the referenced document you have requested to be allowed to implement the clarification of the requirements for annual inspections obtained in November 16, 2005 email from EPA Region 10. Without a basis and to be consistent with past interpretations, WDOH cannot give global approval to allow a timeframe of greater than 12 months to expire when an "annual" requirement is called out by a standard. WDOH will, on a case-by-case basis review requests for alternative approvals and accept or reject these request based on the individual case. The department will be following up with a formal letter documenting this position.

Also, the following changes will be made:

Emission Unit (EU) 63 (696-W-2) stack diameter was requested to be changed to 3 X 1 ft. rectangular. Our database is only set to take stack diameters (an effective stack diameter of 1.83 was calculated for the rectangular stack and will be used. See note below). A note has been placed in the Operational Status as follows "Operations at the Waste Sampling and Characterization Facility involve low level radiological and chemical sample analyses and storage on the Hanford Site. The stack is a 3' X 1' rectangular duct."

EUs 439, 448, 454, 461, 465, 472, 473 Abatement Technology was changed to BARCT.

Note: The equivalent diameter is the diameter of a circular duct or pipe that gives the same pressure loss as an equivalent rectangular duct or pipe.



The equivalent diameter of a rectangular tube or duct can be calculated as:

$$d_e = 1.30 \times ((a \times b)^{0.625} / (a + b)^{0.25})$$

where

d_e = equivalent diameter

a = length of major or minor side

b = length of minor or major side

From: Schmidt, John W (DOH)
Sent: Thursday, August 04, 2011 7:56 AM
To: Rasmussen, James E; Bates, John A; 'Beam, Thomas G'; 'Penn, Lucinda L'; Shelly_D_Doss@RL.gov; 'Dennis_W_Bowser@orp.doe.gov'
Cc: Martell, P John (DOH); Berven, Shawna D (DOH); Utley, Randell J (DOH); McCormick, Ernest R (DOH)
Subject: FF-01 Renewal information

All,

We are doing the completeness review of the FF-01 renewal application and have found some EUs we have questions on. I'll be sending a list sometime next week with questions to be answered. Our current schedule is to have a completeness determination and letter sent to DOE by COB August 21. As a heads-up we will need a schedule of when DOE will be submitting closure documentation for the NOC's and EU's requested to be closed.

Please feel free to call if you have any questions,

John Schmidt
Washington State Department of Health Radioactive Air Emissions
309 Bradley Blvd Suite 201
(Hanford Mail Stop 81-42)
Richland, WA 99352
Phone: (509)946-3874 Cell: (509)727-0644
Fax: (509)946-0876
Public Health - Always Working for a Safer and Healthier Washington Please visit our web site
<http://www.doh.wa.gov/ehp/rp/air/airhm.htm>

RAES TRACKING INFORMATION

(EU, NOC, AU, ALARACT, IM, LB)

All comments or statements are provided as Technical Assistance as allowed under the authority of Chapter 43.05 RCW Technical Assistance Programs 010(3).

Emission Unit and NOC Closure Documentation – Status/Schedule

(Additional Information Provided to DOH in Support of the FF-01 Renewal Effort)

Table 1 contains a list of those Hanford Site emission units (EUs) identified in Table 2-9 and Appendix A of the AOP/FF-01 renewal application (DOE/RL-2011-27) for deletion/closure and the status for submittal of the appropriate closure documentation in support of those requests.

Table 1. Closure Documentation for EUs Identified in Table 2-9 of FF-01 Renewal Application

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------------|--|
| 0054 200W P-296P028-001 | DOE-ORP submitted a report of closure for this EU to DOH on September 23, 2011 (Letter 11-ESQ-241). |
| 0150 200E P-296AW-001 | DOE-ORP submitted a report of closure for this EU to DOH on September 23, 2011 (Letter 11-ESQ-241). |
| 0168 100K R-1706KE-001 | This EU has been demolished and disposed of in ERDF. It is permanently closed. Closure information was provided to DOH via email on 7/29/2011 (John Bates, CHPRC to John Schmidt, DOH "Closure Information Regarding 1706KE, -KEL, -KER), with the same email subsequently re-forwarded on 8/17/2011 (John Bates, CHPRC to John Schmidt and Ernest McCormick, DOH). The Hanford Site believes the information provided via email includes the appropriate information to support administrative closure of this EU. We request that DOH accept the previously provided information as sufficient "report of closure" for this EU. <i>[For convenience, the referenced email is also attached to the email transmitting this additional information file.]</i> |
| 0236 200E C-106 Sluicing | DOE-ORP submitted a report of closure for this EU to DOH on September 23, 2011 (Letter 11-ESQ-241). |
| 0308 200W P-213W-001 | Although the Hanford Site did propose/request deletion and closure of EU 308 as part of the FF-01 renewal application, we have subsequently re-evaluated our initial request and determined that we do not wish to close this emission unit at this time. We request that DOH ignore the request to delete/close EU 308 and retain it in the renewed FF-01. This message was also communicated via email to DOH staff on 8/18/2011 (Shelly Doss, WRPS, to John Schmidt, DOH "Emission Units Not Being Closed for FF-01 Renewal") and acknowledged by DOH staff the same day. We apologize for any confusion or inconvenience this may have caused DOH staff. <i>[For convenience, the referenced email is also attached to the email transmitting this additional information file.]</i> |
| 0355 300 EP-320-02-S | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT documented transition of EU 355 to regulation under CERCLA effective February 2011 and requested that DOH remove this EU from the FF-01. As part of its close-out of Audit 693, DOH documented completion of its closure inspection |

2011 FF-01 Renewal—Additional Information

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|-------------------------|---|
| | for 320 Building emission units and indicated that they would be removed from the FF-01 (Letter AIR 11-811, dated 8/30/2011). |
| 0357 300 EP-320-04-S | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT documented transition of EU 357 to regulation under CERCLA effective February 2011 and requested that DOH remove this EU from the FF-01. DOE-RL submitted a separate report of closure for this EU to DOH on February 16, 2011 (Letter 11-EMD-0031). As part of its close-out of Audit 693, DOH documented completion of its closure inspection for 320 Building emission units and indicated that they would be removed from the FF-01 (Letter AIR 11-811, dated 8/30/2011). |
| 0358 300 EP-320-01-S | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT documented transition of EU 358 to regulation under CERCLA effective February 2011 and requested that DOH remove this EU from the FF-01. Additionally, as part of its close-out of Audit 693, DOH documented completion of its closure inspection for 320 Building emission units and indicated that they would be removed from the FF-01 (Letter AIR 11-811, dated 8/30/2011). |
| 0362 300 EP-326-01-S | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT documented transition of EU 362 to regulation under CERCLA effective February 2011 and requested that DOH remove this EU from the FF-01. Consistent with the CERCLA transition strategy used for other EUs, the Hanford Site does not believe that additional closure documentation is necessary to support removal of EU 362 from the FF-01. |
| 0366 300 EP-329-01-S | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT documented transition of EU 366 to regulation under CERCLA effective February 2011 and requested that DOH remove this EU from the FF-01. Consistent with the CERCLA transition strategy used for other EUs, the Hanford Site does not believe that additional closure documentation is necessary to support removal of EU 366 from the FF-01. |
| 0422 300 P-340DECON-001 | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on November 23, 2010 (Letter 11-AMRC-0033). The NOT documented transition of EU 422 to regulation under CERCLA effective September 2010 and |

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| Emission Unit (EU) | Closure Documentation Status/Schedule |
|-------------------------------|--|
| | requested that DOH remove this EU from the FF-01. DOH acknowledged transition of EU 422 to CERCLA regulation on February 24, 2011 and agreed to remove it from the FF-01 as part of renewal process (Letter AIR 11-207). |
| 0423 300 P-340NTEX-001 | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on November 23, 2010 (Letter 11-AMRC-0033). The NOT documented transition of EU 423 to regulation under CERCLA effective September 2010 and requested that DOH remove this EU from the FF-01. DOH acknowledged transition of EU 423 to CERCLA regulation on February 24, 2011 and agreed to remove it from the FF-01 as part of renewal process (Letter AIR 11-207). |
| 0539 200 P-Vadose-002 | DOE-ORP submitted a report of closure for this EU to DOH on September 23, 2011 (Letter 11-ESQ-241). |
| 0541 200 P-Vadose-003 | DOE-ORP submitted a report of closure for this EU to DOH on September 23, 2011 (Letter 11-ESQ-241). |
| 0874 200W Concrete Containers | EU 874 is part of the PFP Complex and has been transitioned to regulation under CERCLA. DOE-RL submitted a CERCLA Notice of Transition (NOT) for the PFP Complex on September 10, 2009 (Letter 09-EMD-0123). Although EU 874 was mistakenly not specifically identified, the NOT did identify NOC ID 655 "Transition of the Plutonium Finishing Plant" as part of the CERCLA transition process. EU 874 is encompassed as part of the activities approved by NOC ID 655. DOH acknowledged transition of the PFP Complex to CERCLA regulation on October 23, 2009 and indicated that the EUs and NOC identified in the NOT (including NOC ID 655) would be removed from the FF-01 (Letter AIR 09-1003). The Hanford Site requests that DOH recognize the transition of EU 874 to CERCLA based on its prior acknowledgment for NOC ID 655, and delete EU 874 from the FF-01 without the need for additional documentation. |
| 0891 100K Diffuse/Fugitive | EU 891 was added to the FF-01 when DOH issued NOC ID 742. The Hanford Site anticipates providing DOH with appropriate report of closure documentation for NOC ID 742 "Waste Repackaging Outdoors at Cold Vacuum Drying Facility" no later than December 30, 2011, and this will include closure of EU 891. |
| 1176 FFTF PTRAEU's | Although the Hanford Site did propose/request deletion and subsequent closure of EU 1176 as part of the FF-01 renewal application (as well as its removal from being linked with NOC ID 776), we have subsequently re-evaluated our initial request and determined that we do not wish to close this emission unit at this time. We request that DOH ignore the request to delete/close EU 1176 and retain it in the renewed FF-01. We apologize for any confusion or inconvenience this may have caused DOH staff. It is noted that the designation of "NONE" under the Abatement |

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| Emission Unit (EU) | Closure Documentation Status/Schedule |
|-------------------------|--|
| | Technology section of the license likely needs to be revised to "BARCT" for consistency with other entries in the FF-01. |
| 1228 600 P-6241V-001 | Although the Hanford Site did propose/request deletion and closure of EU 1228 as part of the FF-01 renewal application, we have subsequently re-evaluated our initial request and determined that we do not wish to close this emission unit at this time. We request that DOH ignore the request to delete/close EU 1228 and retain it in the renewed FF-01. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 1230 600 P-6241A-001 | Although the Hanford Site did propose/request deletion and closure of EU 1230 as part of the FF-01 renewal application, we have subsequently re-evaluated our initial request and determined that we do not wish to close this emission unit at this time. We request that DOH ignore the request to delete/close EU 1230 and retain it in the renewed FF-01. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 1249 200W P-241S102-002 | Although the Hanford Site did propose/request deletion and closure of EU 1249 as part of the FF-01 renewal application, we have subsequently re-evaluated our initial request and determined that we do not wish to close this emission unit at this time. We request that DOH ignore the request to delete/close EU 1249 and retain it in the renewed FF-01. This message was also communicated via email to DOH staff on 8/18/2011 (Shelly Doss, WRPS, to John Schmidt, DOH "Emission Units Not Being Closed for FF-01 Renewal") and acknowledged by DOH staff the same day. We apologize for any confusion or inconvenience this may have caused DOH staff. <i>[For convenience, the referenced email is also attached to the email transmitting this additional information file.]</i> |

Table 2 contains a list of the Hanford Site notice of construction (NOC) approvals identified in Table 2-9 and Appendix A of the AOP/FF-01 renewal application (DOE/RL-2011-27) for deletion/closure and the status for submittal of the appropriate closure documentation in support of those requests.

Table 2. Closure Documentation for NOCs Identified in Table 2-9 of FF-01 Renewal Application

| NOC ID | Impacted EUs | Closure Documentation Status/Schedule |
|--------|--------------|--|
| 655 | 486, 874 | DOE-RL submitted a CERCLA Notice of Transition (NOT) for the PFP Complex on September 10, 2009 (Letter 09-EMD-0123). The NOT specifically identified NOC ID 655 "Transition of the Plutonium Finishing Plant" as part of the CERCLA transition process. DOH acknowledged transition of the PFP Complex to CERCLA transition on October 23, 2009 and agreed that NOC ID 655 would be removed from the FF-01 (Letter AIR 09-1003). |
| 677 | 362 | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of |

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| NOC ID | Impacted EUs | Closure Documentation Status/Schedule |
|--------|------------------|---|
| | | Transition (NOT) for the 326 Building to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT specifically identified NOC ID 677 "Research at the 326 Facility" as part of the CERCLA transition process. Because activities at the 326 Building with the potential to produce radioactive air emissions have transitioned to regulation under CERCLA, the Hanford Site does not believe that additional closure documentation is necessary to support deletion of NOC ID 677 from the FF-01. |
| 683 | 498 | Although the Hanford Site did propose/request deletion and closure of NOC ID 683 "Liquid Pumping and Enhanced Sluicing on Tank 241-C-106" in the FF-01 renewal application, we have subsequently re-evaluated our initial request and decided not to pursue closure of this NOC at this time. We request that DOH ignore the request to delete/close NOC ID 683 and retain it in the renewed FF-01 under EU 498. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 694 | 57, 58, 134, 486 | Although the Hanford Site did propose/request deletion and closure of NOC ID 694 "241-S-102 Installation and Operation of Waste Retrieval" in the FF-01 renewal application, we have subsequently re-evaluated our initial request and decided not to pursue closure of this NOC at this time. We request that DOH ignore the request to delete/close NOC ID 694 and retain it in the renewed FF-01 under EUs 57, 58, 134 and 486. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 698 | 486, 749 | Although the Hanford Site did propose/request deletion and closure of NOC ID 698 "241-C-200 Series Tanks Retrieval" in the FF-01 renewal application, we have subsequently re-evaluated our initial request and decided not to pursue closure of this NOC at this time. We request that DOH ignore the request to delete/close NOC ID 698 and retain it in the renewed FF-01 under EUs 486 and 749. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 701 | 366 | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for the 329 Building to DOH on February 25, 2011 (Letter 11-AMRC-0096). The NOT specifically identified NOC ID 701 "Operation of Research Activities conducted in the Chemical Sciences Laboratory (329 Building)" as part of the CERCLA transition process. Because activities at the 329 Building with the potential to produce radioactive air emissions have transitioned to regulation under CERCLA, the Hanford Site does not believe that additional closure documentation is necessary to support deletion of NOC ID 701 from the FF-01. |
| 704 | 423 | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for the 340 Complex on November 23, 2010 (Letter 11-AMRC-0033). The NOT specifically identified NOC ID 704 |

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| NOC ID | Impacted EUs | Closure Documentation Status/Schedule |
|--------|--------------|---|
| | | "Operation of the 340 Waste Storage" as part of the CERCLA transition process. DOH acknowledged transition of the 340 Complex to CERCLA regulation on February 24, 2011 and agreed to remove it from the FF-01 as part of renewal process (Letter AIR 11-207). |
| 705 | 486, 878 | Although the Hanford Site did propose/request deletion and closure of NOC ID 705 "Supplemental Treatment Test and Demonstration Facility" in the FF-01 renewal application, we have subsequently re-evaluated our initial request and decided not to pursue closure of this NOC at this time. We request that DOH ignore the request to delete/close NOC ID 705 and retain it in the renewed FF-01 under EUs 486 and 878. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 742 | 891 | The Hanford Site anticipates providing DOH with appropriate report of closure documentation for NOC ID 742 "Waste Repackaging Outdoors at Cold Vacuum Drying Facility" no later than December 30, 2011. |
| 747 | 465 | The Hanford Site anticipates providing DOH with appropriate report of closure documentation for NOC ID 747 "Demolition of the Purgewater Storage and Treatment Facility Unit #1" no later than December 30, 2011. |
| 776 | 1176 | Although the Hanford Site did propose/request deletion and closure of NOC ID 776 "Sodium Residuals Reaction/Removal and other Deactivation Work Activities at the Fast Flux Test Facility" in the FF-01 renewal application as part of the requested closure of EU 1176, we have subsequently re-evaluated our initial request and determined that we do not wish to close this NOC at this time. We request that DOH ignore the request to delete/close NOC ID 776 and retain it in the renewed FF-01 under EU 1176. We apologize for any confusion or inconvenience this may have caused DOH staff. |
| 785 | 539, 541 | The request to delete NOC ID 785 "Tank Waste Remediation System Vadose Zone Characterization" is only in the context of the requested closure/deletion of EUs 539 and 541 (see above Table 1 for additional information on closure of these EUs). NOC ID 785 would continue to be identified under EU 486. Thus, the Hanford Site is not actually proposing to close NOC ID 785 and is not planning to submit closure documentation. |
| 788 | 57, 203, 486 | Although the Hanford Site did propose/request deletion and closure of NOC ID 788 "Installation and Operation of Waste Retrieval Systems in Single Shell Tank (SST) 241-S-112" in the FF-01 renewal application, we have subsequently re-evaluated our initial request and decided not to pursue closure of this NOC at this time. We request that DOH ignore the request to delete/close NOC ID 788 and retain it in the renewed FF-01 under EUs 57, 203 and 486. We apologize for any confusion or inconvenience this may have caused DOH staff. |

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Table 3 contains a list of the Hanford Site minor diffuse and fugitive emission units (D/F EUs) identified in Table 2-8 of the AOP/FF-01 renewal application (DOE/RL-2011-27) to reflect proposed changes to the corresponding table of D/F EUs in Enclosure 2 Table 2-1 of the current AOP, including both those proposed for deletion/closure and those requiring administrative changes to eliminate redundancies or correct typographical errors. The table includes either a status of EU closure documentation (as appropriate) or a more detailed explanation of proposed administrative changes. The information provided below includes references to relevant supplemental information provided on November 28, 2005 in support of the 2006 FF-01 renewal effort (Letter 06-ESD-0019 “Hanford Site Diffuse and Fugitive Radioactive Emission Sources”).

Table 3. Closure Documentation for D/F EUs Identified in Table 2-8 of FF-01 Renewal Application

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| 424 P-340BBLDG-001 | As referenced in Table 2-1 of the AOP/FF-01 renewal application (DOE/RL-2011-27), DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on November 23, 2010 (Letter 11-AMRC-0033). The NOT documented transition of EU 424 to regulation under CERCLA effective September 2010 and requested that DOH remove this EU from the FF-01. DOH acknowledged transition of EU 424 to CERCLA regulation on February 24, 2011 and agreed to remove it from the FF-01 as part of renewal process (Letter AIR 11-207). |
| 477 J-241ER152-001 | Diversion box 241-ER-152 is a single diffuse/fugitive source that is redundantly captured by multiple EUs in Enclosure 2 Table 2-1 of the current FF-01 (EU 170 P-241ER152-001 and EU 477 J-241ER152-001). To address this administrative redundancy, the Hanford Site is proposing to delete EU 477 and retain EU 170. Retaining the “P” designation appears to be more appropriate for a diversion box diffuse/fugitive source. However, if DOH believes retention of the “J” designation (EU 477) is more appropriate, that would be acceptable to the Hanford Site. In either case, the Hanford Site does not believe separate closure documentation is necessary to correct this administrative redundancy in the FF-01. |
| 809 216A-2-2 | The “216A-2-2” designation does not apply to any known Hanford Site structure, waste site or other potential source of diffuse/fugitive radioactive air emissions. Based on an evaluation of information provided to support the 2006 FF-01 renewal effort (Letter 06-ESD-0019) and that contained in the DOH EU database (description, latitude, longitude, etc.), the Hanford Site has determined that EU 809 is redundant with EU 1003 (“216A”) in the current FF-01 Enclosure 2 Table 2-1. Unfortunately, this discrepancy was not noted during the 2006 FF-01 renewal effort. We are proposing to address this administrative redundancy by deleting EU 809 and retaining EU 1003. The Hanford Site does not believe separate closure documentation is necessary to correct this administrative redundancy in the FF-01. |
| 896 200-E-5 | Use of the incorrect designation “200-E-5” for EU 896 is an inadvertent typographical error that was carried forward from the information provided to DOH in support of the 2006 FF-01 renewal effort (Letter 06-ESD-0019). Unfortunately, the Hanford Site failed to note and correct this |

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| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| | administrative discrepancy during the 2006 renewal effort. The Hanford Site is proposing to correct this error and reflect the appropriate designation for EU 896 ("200-E-53"). |
| 964 291-U | EU 964 is part of the U Plant Facilities and has been transitioned to regulation under CERCLA. DOE-RL submitted a CERCLA Notice of Transition (NOT) for the U Plant Facilities on September 10, 2009 (Letter 09-EMD-0124). Although EU 964 was mistakenly not specifically identified, the NOT did reference DOE/RL-2006-21 "Remedial Design/Remedial Action Work Plan for the 221-U Facility" as one of the controlling CERCLA documents for U Plant Facilities. DOE/RL-2006-21 identifies that the 291-U building (EU 964) is encompassed as part of the U Plant Facilities. DOH acknowledged transition of the U Plant Facilities to CERCLA regulation on October 23, 2009 (Letter AIR 09-1002). The Hanford Site requests that DOH recognize the transition of EU 964 to CERCLA based on its prior acknowledgment for U Plant Facilities, and delete EU 964 from the FF-01 without the need for additional documentation. |
| 965 600-148 | EU 965 (Designation "600-148") is the Environmental Restoration Disposal Facility (ERDF), which has always been operated under CERCLA authority and should not have been included in the FF-01 license as part of the 2006 renewal effort. ERDF was identified in the supplemental information provided to support the 2006 renewal effort (Letter 06-ESD-0019) for informational purposes only, but was mistakenly not clearly identified as such. Unfortunately, the Hanford Site failed to note and correct this inappropriate inclusion at that time. We request that EU 965 be removed from the FF-01 as part of this renewal effort without the need for additional closure documentation. |
| 973 116-K-3 | <p><i>[[The Hanford Site inadvertently failed to include EU 973 as a proposed FF-01 deletion in the original renewal application. This oversight was noted during preparation of this additional information for DOH.]]</i></p> <p>EU 973 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-96-17 "Remedial Design Report/Remedial Action Work Plan for the 100 Area" • "Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units, Hanford Site, Benton County Washington" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 973 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 973 from the FF-01, without the need for additional documentation.</p> |

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| 997 212N | <p>EU 997 was transitioned to regulation under CERCLA. The 212N structure has been demolished and disposed of in ERDF, eliminating the source of permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2009-11 "212-N, -P, and -R Facilities Removal Action Work Plan" • DOE/RL-2008-80 "Action Memorandum for the Non-Time-Critical Removal Action for the 212-N, -P, and -R Facilities" • DOE/RL-2008-07 "212-N, -P, and -R Facilities Engineering Evaluation/Cost Analysis" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 997 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 997 from the FF-01 without the need for additional documentation.</p> |
| 998 212P | <p>EU 998 was transitioned to regulation under CERCLA. The 212P structure has been demolished and disposed of in ERDF, eliminating the source of permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2009-11 "212-N, -P, and -R Facilities Removal Action Work Plan" • DOE/RL-2008-80 "Action Memorandum for the Non-Time-Critical Removal Action for the 212-N, -P, and -R Facilities" • DOE/RL-2008-07 "212-N, -P, and -R Facilities Engineering Evaluation/Cost Analysis" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 998 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 998 from the FF-01 without the need for additional documentation.</p> |
| 999 212R | <p>EU 999 was transitioned to regulation under CERCLA. The 212R structure has been demolished and disposed of in ERDF, eliminating the source of permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2009-11 "212-N, -P, and -R Facilities Removal Action Work Plan" • DOE/RL-2008-80 "Action Memorandum for the Non-Time-Critical Removal Action for the 212-N, -P, and -R Facilities" • DOE/RL-2008-07 "212-N, -P, and -R Facilities Engineering Evaluation/Cost Analysis" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 999 to CERCLA regulation, accept this</p> |

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|--|
| | information as a “surrogate” CERCLA Notice of Transition, and delete EU 999 from the FF-01 without the need for additional documentation. |
| 1010 216ZPIA | <p>EU 1010 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 “Removal Action Work Plan for Central Plateau General Decommissioning Activities” • DOE/RL-2010-22 “Action Memorandum for General Hanford Site Decommissioning Activities” • DOE/RL-2010-14 “Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities” <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1010 to CERCLA regulation, accept this information as a “surrogate” CERCLA Notice of Transition, and delete EU 1010 from the FF-01 without the need for additional documentation.</p> |
| 1027 211TB | <p>The “211TB” designation does not apply to any known Hanford Site structure, waste site or other potential source of diffuse/fugitive radioactive air emissions. Based on an evaluation of information provided to support the 2006 FF-01 renewal effort (Letter 06-ESD-0019) and that contained in the DOH EU database (description, latitude, longitude, etc.), the Hanford Site has determined that “221TB” is the correct designation for EU 1027 instead of “211TB” as shown in the current FF-01 Enclosure 2 Table 2-1. Unfortunately, this administrative error was not noted and corrected during the 2006 FF-01 renewal effort.</p> |
| 1030 224U | <p>EU 1030 was transitioned to regulation under CERCLA. The 224U structure has been demolished and disposed of in ERDF, eliminating the source of permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2004-83 “U Plant Ancillary Facilities Removal Action Work Plan” • DOE/RL-2004-67 “Action Memorandum for the Non-Time-Critical Removal Action for the U Plant Ancillary Facilities” • DOE/RL-2004-40 “Engineering Evaluation/Cost Analysis for the U Plant Ancillary Facilities” <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1030 to CERCLA regulation, accept this information as a “surrogate” CERCLA Notice of Transition, and delete EU 1030 from the FF-01 without the need for additional documentation.</p> |
| 1037 225WA | <p>EU 1037 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action</p> |

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| | <p>included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1037 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1037 from the FF-01 without the need for additional documentation.</p> |
| 1050 2710S | <p>EU 1050 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1050 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1050 from the FF-01 without the need for additional documentation.</p> |
| 1052 2711B | <p>EU 1052 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1052 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1052 from the FF-01 without the need for additional documentation.</p> |
| 1053 2711S | EU 1053 was transitioned to regulation under CERCLA, eliminating the |

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| | <p>requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1053 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1053 from the FF-01 without the need for additional documentation.</p> |
| 1054 2712A | <p>EU 1054 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1054 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1054 from the FF-01 without the need for additional documentation.</p> |
| 1056 2714A | <p>EU 1056 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1056 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete</p> |

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|--|
| | EU 1056 from the FF-01 without the need for additional documentation. |
| 1064 271U | <p>EU 1064 is part of the U Plant Facilities and has been transitioned to regulation under CERCLA. DOE-RL submitted a CERCLA Notice of Transition (NOT) for the U Plant Facilities on September 10, 2009 (Letter 09-EMD-0124). Although EU 1064 was mistakenly not specifically identified, the NOT did reference DOE/RL-2006-21 "Remedial Design/Remedial Action Work Plan for the 221-U Facility" as one of the controlling CERCLA documents for U Plant Facilities. DOE/RL-2006-21 identifies that the 271U building (EU 1064) is encompassed as part of the U Plant Facilities. DOH acknowledged transition of the U Plant Facilities to CERCLA regulation on October 23, 2009 (Letter AIR 09-1002). The Hanford Site requests that DOH recognize the transition of EU 1064 to CERCLA based on its prior acknowledgment for U Plant Facilities, and delete EU 1064 from the FF-01 without the need for additional documentation.</p> |
| 1065 2727W | <p>EU 1065 was transitioned to regulation under CERCLA. The 2727W structure has been demolished and disposed of in ERDF, eliminating the source of permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1065 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1065 from the FF-01 without the need for additional documentation.</p> |
| 1069 275EA | <p>EU 1069 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1069 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete</p> |

2011 FF-01 Renewal—Additional Information

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| | EU 1069 from the FF-01 without the need for additional documentation. |
| 1075 276U | <p>EU 1075 is part of the U Plant Facilities and has been transitioned to regulation under CERCLA. DOE-RL submitted a CERCLA Notice of Transition (NOT) for the U Plant Facilities on September 10, 2009 (Letter 09-EMD-0124). Although EU 1075 was mistakenly not specifically identified, the NOT did reference DOE/RL-2006-21 "Remedial Design/Remedial Action Work Plan for the 221-U Facility" as one of the controlling CERCLA documents for U Plant Facilities. DOE/RL-2006-21 identifies that the 276U building (EU 1075) is encompassed as part of the U Plant Facilities. DOH acknowledged transition of the U Plant Facilities to CERCLA regulation on October 23, 2009 (Letter AIR 09-1002). The Hanford Site requests that DOH recognize the transition of EU 1075 to CERCLA based on its prior acknowledgment for U Plant Facilities, and delete EU 1075 from the FF-01 without the need for additional documentation.</p> |
| 1076 281A | <p>EU 1076 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1076 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1076 from the FF-01 without the need for additional documentation.</p> |
| 1077 2901A | <p>EU 1077 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1077 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete</p> |

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|--|
| 1082 2904SA | <p>EU 1077 from the FF-01 without the need for additional documentation.</p> <p>EU 1082 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1082 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1082 from the FF-01 without the need for additional documentation.</p> |
| 1090 291AG | <p>EU 1090 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1090 to CERCLA regulation, accept this information as a "surrogate" CERCLA Notice of Transition, and delete EU 1090 from the FF-01 without the need for additional documentation.</p> |
| 1092 291AJ | <p>EU 1092 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 "Removal Action Work Plan for Central Plateau General Decommissioning Activities" • DOE/RL-2010-22 "Action Memorandum for General Hanford Site Decommissioning Activities" • DOE/RL-2010-14 "Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities" <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that</p> |

2011 FF-01 Renewal—Additional Information

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|---|
| | DOH recognize the transition of EU 1092 to CERCLA regulation, accept this information as a “surrogate” CERCLA Notice of Transition, and delete EU 1092 from the FF-01 without the need for additional documentation. |
| 1109 292U | EU 1109 is part of the U Plant Facilities and has been transitioned to regulation under CERCLA. DOE-RL submitted a CERCLA Notice of Transition (NOT) for the U Plant Facilities on September 10, 2009 (Letter 09-EMD-0124). Although EU 1109 was mistakenly not specifically identified, the NOT did reference DOE/RL-2006-21 “Remedial Design/Remedial Action Work Plan for the 221-U Facility” as one of the controlling CERCLA documents for U Plant Facilities. DOE/RL-2006-21 identifies that the 292U building (EU 1109) is encompassed as part of the U Plant Facilities. DOH acknowledged transition of the U Plant Facilities to CERCLA regulation on October 23, 2009 (Letter AIR 09-1002). The Hanford Site requests that DOH recognize the transition of EU 1109 to CERCLA based on its prior acknowledgment for U Plant Facilities, and delete EU 1109 from the FF-01 without the need for additional documentation. |
| 1119 295AE | <p>EU 1119 was transitioned to regulation under CERCLA, eliminating the requirement for permitted diffuse/fugitive radioactive air emissions from this EU. The controlling CERCLA documentation for this removal action included:</p> <ul style="list-style-type: none"> • DOE/RL-2010-33 “Removal Action Work Plan for Central Plateau General Decommissioning Activities” • DOE/RL-2010-22 “Action Memorandum for General Hanford Site Decommissioning Activities” • DOE/RL-2010-14 “Engineering Evaluation/Cost Analysis for General Hanford Site Decommissioning Activities” <p>Each of these documents went through the appropriate CERCLA public involvement process and was approved by DOE and the designated lead regulatory agency (EPA, Ecology or both). The Hanford Site requests that DOH recognize the transition of EU 1119 to CERCLA regulation, accept this information as a “surrogate” CERCLA Notice of Transition, and delete EU 1119 from the FF-01 without the need for additional documentation.</p> |
| 1121 307 | The proposed name change for this EU was an error in the AOP/FF-01 renewal application (DOE/RL-2011-27) that failed to recognize the previous transition of EU 1121 to regulation under CERCLA and the previous submittal of corresponding documentation to DOH. As referenced in Table 2-1 of the AOP/FF-01 renewal application, DOE-RL submitted a CERCLA Notice of Transition (NOT) for this EU to DOH on November 23, 2010 (Letter 11-AMRC-0033). The NOT documented transition of EU 1121 to regulation under CERCLA effective September 2010 and requested that DOH remove this EU from the FF-01. DOH acknowledged transition of EU 1121 to CERCLA regulation on February 24, 2011 and agreed to remove it from the FF-01 as part of renewal process (Letter AIR 11-207). |
| 1125 Alkali Metal | The designation “Alkali Metal” for this EU as reflected in the current FF-01 Enclosure 2 Table 2-1 is vague and could refer to multiple facilities on the |

2011 FF-01 Renewal—Additional Information

| Emission Unit (EU) | Closure Documentation Status/Schedule |
|--------------------|--|
| | <p>Hanford Site, leading to potential confusion as to which specific source EU 1125 is intended to reflect. Based on an evaluation of information provided to support the 2006 FF-01 renewal effort (Letter 06-ESD-0019) and that contained in the DOH EU database, it was determined that the complete description for this EU is "Alkali Metal Waste Storage Modules at CWC". Additional review of Hanford Site data systems verified that this is the correct description. The Hanford Site is proposing to revise the designation for EU 1125 to "Alkali Metal Waste Storage Modules at CWC" to ensure there is no future confusion as to which structure this EU is referring to.</p> |

Beam, Thomas G

From: Rasmussen, James E
Sent: Monday, July 25, 2011 5:03 PM
To: Schmidt, John
Cc: LeBaron, Gregory J; Williams, Joel F Jr; Simmons, Fen M; Engelmann, Richard H; Quintero, Roger; Norman, Dottie L; Farabee, Oliver A; Weil, Stephen; Jackson, Dale E.; Bates, John A
Subject: AOP Renewal Re: MASF & FFTF

Mr. Schmidt,

During the CHPRC/WDOH Technical Exchange meeting held with you on Wednesday, July 20, we received your request for clarification of the "Operational Status" entries we submitted earlier for the FFTF and MASF licenses as part of the AOP renewal application. The revised text in question is as follows:

* For the NOC titled "Sodium Residuals Reaction/Removal and other Deactivation Work Activities at the Fast Flux Test Facility", the 437 Maintenance & Storage (units 1 and 2), Emission Unit ID 385, the Operational Status entry was revised as follows:

"Activities at the MASF support K Basin sludge research and development activities." Activities at the MASF support FFTF deactivation activities, and surveillance and maintenance operations at the Hanford Site.

* For the NOC titled "Sodium Residuals Reaction/Removal and other Deactivation Work Activities at the Fast Flux Test Facility", the HTTR and CBEX, Emission Unit IDs 396 and 397, respectively, the Operational Status entry was revised as follows:

FFTF changes for HTTR and CBEX were: "Activities at the FFTF support surveillance and maintenance operations for decontamination and deactivation at the Hanford Site." The FFTF is undergoing deactivation.

* For the NOC titled "Construction and Operation of Sodium Storage Facility", the 400 Sodium Storage Facility, Emission Unit ID 398, the Operational Status entry was revised as follows:

"Activities at the SSF support surveillance and maintenance operations for decontamination and deactivation at the Hanford Site by storing the sodium. The Sodium Storage Facility (SSF) stores the sodium in a solid state for an extended period. Approximately 984,100 liters of sodium from the FFTF was offloaded to four tanks in SSF." The mission of the Sodium Storage Facility (SSF) is to receive molten sodium coolant from the Fast Flux Test Facility (FFTF) and store the sodium in a solid state for an extended period. Approximately 984,100 liters of sodium from the FFTF will be offloaded to tank storage in SSF. Unused, carbon steel sodium tanks (three 302,800 liter tanks and one 196,800 liter tank) originally built for the Clinch River Breeder Reactor Plant have been installed adjacent to the FFTF complex

In each case, the intent in updating the operational status for these facilities was to show that they are now under different organizations -

1. The MASF is now part of the CHPRC D&D Project and the sludge research and development activities conducted there are all non-radioactive with no PTE associated with the research work. The only reason the MASF remains an NOC licensed emission unit is to address the contaminated glovebox housed within the building. The sludge research and development activities do not affect the glovebox nor its ventilation.

2. The HTTR and CBEX emission units associated with FFTF had the operational status entries revised simply to reflect their being managed under the CHPRC D&D Project, with no change in processing or PTE.

3. The 400 Sodium Storage Facility emission unit had the operational status entry revised to update the sodium storage status at that unit. No change in process or PTE are involved.

As explained in the three items above, no revision or modification of the subject emission unit licenses is being requested or described as part of the AOP renewal effort. Please feel free to call me on 376-7574 with any questions or need for further information.

Thanks,

JAMES E. RASMUSSEN
RASMUSSEN ENVIRONMENTAL LLC
Sub-contractor to YAHS GS LLC
Contractor to U.S. Department of Energy
825 Jadwin Avenue
Richland, Wa. 99352
(509) 376-7574
MSN A5-15 Rm. 587
james.rasmussen@rl.doe.gov

Beam, Thomas G

From: Bates, John A
Sent: Friday, July 29, 2011 3:07 PM
To: Schmidt, John
Cc: Watson, David J (Dave); Rasmussen, James E; Engelmann, Richard H; Simmons, Fen M; Martell, John; Beam, Thomas G; Anderson, Robert H
Subject: Closure Information Regarding 1706KE, -KEL, and -KER
Attachments: 1706KE,-KEL-KER in AOP History.pdf; 1706KE,-KEL,-KER Descript from EECA.pdf; 1706KE,-KEL,-KER Floor Plans.pdf

John,

Dave Watson has provided essentially all the following information in response to your request at the July 20 Technical Exchange meeting. In the interest of adequately confirming permanent closure (in this case elimination) of the 1706K emission units listed below, please see the attached copy (file name 1706KE, -KEL, -KER Descript from EECA.pdf) which provides excerpts from the Engineering Evaluation/Cost Analysis for the 105-KE and 105-KW Reactor Facilities and Ancillary Facilities, DOE/RL-2005-86, Rev. 0. The entire EE/CA file is available at the following link: <http://www2.hanford.gov/arpir/?content=findpage&AKey=DA02850332>. This information is provided in the interest of confirming that a public notice mechanism was involved prior to the closure and removal of the various 1706K emission units.

Regarding the archival 1706KE facility descriptive paper you provided copies of during the Technical Exchange, it represented a pre-EC/CA effort descriptive of the closure of the 1706KEL stack. Please note that it included an emission unit number associated with 1706KE written on the cover. On that paper work, Work Package 1K-98-1999 should be 1K-98-1997.

The emission unit designations in the 1706KE complex can be confused easily because there were four units: 1706KE, 1706KEL, and two associated with 1706KER. Each of these at one time were fitted with stacks or exhaust vents.

Below is a summary table of information to help clarify things. The DOH ID numbers may be switched for the two 1706 KER vents, as what was available in the history files of the AOP didn't provide enough to discriminate between these two.

In addition, attached are the following:

1. Excerpt from an AOP historical data file
2. Excerpt from the Engineering Evaluation and Cost Analysis for the 100K Ancillary Facilities describing each of these facilities
3. Floor plans for each

1706 KE Associated Facilities and Stack Status

| Associated Facility | DOH ID | Closure Means | Closure Date | Work Package that Performed the Closure |
|----------------------|--------|---|----------------------------|---|
| 1706 KE | 168 | Shutting exhaust fan off and removing it as part of facility demo | 2009(deact) 2010 (demo) | 1K-08-7799 (demo) |
| 1706 KEL | 178 | Capping the exhaust | 6/23/1999 | 1K-98-1997 |
| 1706 KER(EV-2 vent) | 196 | Capping the | 12/3/1998 | 1K-98-1995 |

| | | | | |
|----------------------|-----|---------------------|------------|------------|
| | | exhaust | | |
| 1706 KER (EV-7 vent) | 176 | Capping the exhaust | 12/18/1998 | 1K-98-2423 |

Please accept this email as our confirmed evidence of permanent closure of the four listed emission units. Please contact Dave Watson 438-6721 (cell), or Fen (372-0413), or myself with any questions.

Thanks,

John
376-2088

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R-1706KE-001

1706KE

AEI Number: R-1706KE-001

DOH ID: 168

Designation: Minor

AOP Pages: EU0168-001

Contractor: CHPRC-100K

Operational Status: Activities at the 1706KE Laboratory involve decontamination and decommissioning activities including CERCLA cleanup operations at the Hanford Site.

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Current Control Technology

Applicable Requirement: ALARACT

(Flow Diagram)

| Zone | Description | Required Number of Units | Additional Description |
|------|-------------|--------------------------|------------------------|
| | HEPA | 1 | |
| | Fan | 1 | Intermittent operation |

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(ABCASH Codes: Y243)

| Federal and State Regulatory Requirement | Permit Monitoring and Testing Procedure | Permit Required Sampling | Permit Sampling Frequency | Radionuclide Requiring Measurement |
|--|---|--------------------------|---------------------------|------------------------------------|
| 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) | 40 CFR 61, Appendix B, Method 114(3) | Record Sample | 4 week sample/year | TOTAL ALPHA TOTAL BETA |

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| Document Number | Document Date | Title | Description |
|-----------------|---------------|---|---|
| AIR 08-1024 | 10/31/2008 | Closure of NOV and Compliance Order (Audit 425) | This letter provides the actions and responses detailed as a result of the closure of the Notice of Violation. |
| 08-EMD-0042 | 06/03/2008 | Partial Advance Response to the State of Washington, Department of Health Notice of Violation Required Actions, | The referenced letter AIR 08-106, required reassessments of the PTE for four stacks (296-P-31, 1706-KE, 291-S-1 and 291-U-1. This partial response includes reassessments of the PTE for 296-P-31 and |

| | | | |
|----------------------|------------|--|---|
| | | AIR 08-106. Dated January 11, 2008 | 1706-KE. The reassessments result in 296-P-31 remaining Major and 1706-KE remaining Minor. This submittal closes all actions under the NOV for stacks 291-P-31 and 1706-KE. |
| AIR 08-302 | 03/07/2008 | Notice of Violation (NOV) Extension, Audit 425 | Per the Feb. 27 meeting and follow-up email exchanges, WDOH (the department) is in agreement of granting an extension from the original March 11, 2008, response date to July 18, 2008, for the three continued actions specified in this letter. |
| AIR 08-106/Audit 425 | 01/11/2008 | Response to Hanford Sitewide Actions in Notice of Violation (NOV) and Compliance Order on Emission Unit 296-S-21 [EU ID 254] at the 222S Laboratory Dated July 27 2007 | This document outlines WDOHs response to a NOV and Compliance Order on 296-S-21 at the 222-S Laboratory on July 27, 2007. The inspection also found that insufficient information was being collected to evaluate PTE. |
| 0601559 | 06/15/2006 | Public Comment Period for the Significant Modification of the AOP, Removal of 1706-K, 142-K, and 1724-K Building Sources | Transmittal of the public comment Focus Sheet by Ecology for the public comment period associated with the removal of emission units R-1706-KE, P-296K142 and NOC approval 97 NM-551 from the Hanford Site air operating permit. |
| RTAM (4/9/1996) | 04/09/1996 | Relocation of the 183-KE Radiological Counting Lab | Approval to relocate the 183-KE radiological counting lab to 1706-KE. 1706-KE lab hoods are not HEPA filtered. only the main stack is filtered. Obsolete 2/2/1999. |

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 URL: <http://www7.rl.gov/aop/epinfo.cfm?epID=970>

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R-1706KEL-001

1706KE LAB

Closed: 12/10/1999

AEI Number: R-1706KEL-001

DOH ID: 178

Designation: Minor

Operational Status: - None -

AOP Pages: Not in AOP

Contractor: CHPRC-100K

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Current Control Technology

Applicable Requirement: ALARACT

(Flow Diagram)

| Zone | Description | Required Number of Units | Additional Description |
|------|-------------|--------------------------|------------------------|
| | Fan | 1 | Intermittent operation |
| | HEPA | 1 | |

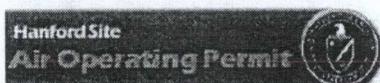
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| Federal and State Regulatory Requirement | Permit Monitoring and Testing Procedure | Permit Required Sampling | Permit Sampling Frequency | Radionuclide Requiring Measurement |
|---|---|--------------------------|---------------------------|------------------------------------|
| 40 CFR 61.93[b][4][i] WAC 246-247-075[3] | Appendix B, Method 114(3) | NDA | 1 every 5 years | Cs 137 |

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 URL: <http://www7.rl.gov/aop/epInfo.cfm?epID=4>

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R-1706KER-001

1706KER

Closed: 02/18/1999

AEI Number: R-1706KER-001

DOH ID: 196

Designation: Minor

Operational Status: - None -

AOP Pages: Not in AOP

Contractor: CHPRC-100K

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Current Control Technology

Applicable Requirement: ALARACT

(Flow Diagram)

| Zone | Description | Required Number of Units | Additional Description |
|------|-------------|--------------------------|------------------------|
| | Fan | 1 | Intermittent operation |
| | HEPA | 1 | |

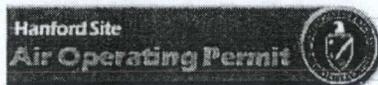
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| Federal and State Regulatory Requirement | Permit Monitoring and Testing Procedure | Permit Required Sampling | Permit Sampling Frequency | Radionuclide Requiring Measurement |
|---|---|--------------------------|---------------------------|------------------------------------|
| 40 CFR 61.93[b][4][i] WAC 246-247-075[3] | Appendix B, Method 114(3) | Record Sample | 4 week sample/year | TOTAL ALPHA TOTAL BETA |

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 URL: <http://www7.rl.gov/aop/epInfo.cfm?epID=5>

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R-1706KER-002

1706KER

Closed: 02/18/1999

AEI Number: R-1706KER-002

DOH ID: 176

Designation: Minor

Operational Status: - None -

AOP Pages: Not in AOP

Contractor: CHPRC-100K

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Current Control Technology

Applicable Requirement: ALARACT

(Flow Diagram)

| Zone | Description | Required Number of Units | Additional Description |
|------|-------------|--------------------------|------------------------|
| | Fan | 1 | Intermittent operation |
| | HEPA | 1 | |

[Back to TOP](#)**Current Sampling & Monitoring**

| Federal and State Regulatory Requirement | Permit Monitoring and Testing Procedure | Permit Required Sampling | Permit Sampling Frequency | Radionuclide Requiring Measurement |
|--|---|--------------------------|---------------------------|------------------------------------|
| | Appendix B, Method 114 | Record Sample | | TOTAL ALPHA TOTAL BETA |

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For questions or comments about this page, please send email to: Robert_H_Anderson@rl.gov
 URL: <http://www7.rl.gov/aop/epInfo.cfm?epID=6>

DOE/RL-2005-86
Rev. 0

Engineering Evaluation/ Cost Analysis for the 105-KE and 105-KW Reactor Facilities and Ancillary Facilities

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Department of Energy

Appendix A – Facility Descriptions

Table A-23 *DOH ID 168*

| | |
|----------------------|---|
| Name: | Water Studies Semi-Works Building |
| Number | 1706-KE |
| Location | Located at the southwest corner of the 105-KE Reactor. |
| Operational Years | 1955-1971 (K Basin Closure Support) |
| Building Description | The 1706-KE building is a single-story concrete and steel frame structure with corrugated transite siding, concrete floors, and flat roof with built-up asphalt and gravel surfacing over cement board and 6.3mm (1/4 in) steel plate. It has a full basement with half sub-basement. The ground floor walls are concrete block and the upper levels are of transite siding. Dimensions: approximate area of 1,042 m ² (11,216 ft ²). |
| Status/History | Purpose is to provide out-of-reactor facilities in support of in-reactor test loops and single-pass tubes. It provides water treatment facilities and instrumented supply systems for eight KE-Reactor tubes used for studies of corrosion and effects of water treatment parameters on effluent activity. One small room contains a TSD unit that is still active. |
| Characterization | Radiological and chemical contamination; unquantified hazardous construction materials |

Table A-24 *DOH ID 178*

| | |
|----------------------|--|
| Name | Development Laboratory |
| Number: | 1706-KEL |
| Location | Adjoins the 1706-KER Water Studies Recirculation building. |
| Operational Years | 1955-1971 (K Basin Closure Support) |
| Building Description | A 251 m ² (2,702 ft ²) building adjoining the 1706-KER building. |
| Status/History | About half of this building is used for instrument development pertinent to water treatment and corrosion control. The remaining part is outfitted for handling corrosion coupons that may be mildly contaminated. |
| Characterization | Radiological and chemical contamination; unquantified hazardous construction materials |

Appendix A – Facility Descriptions

Table A-25

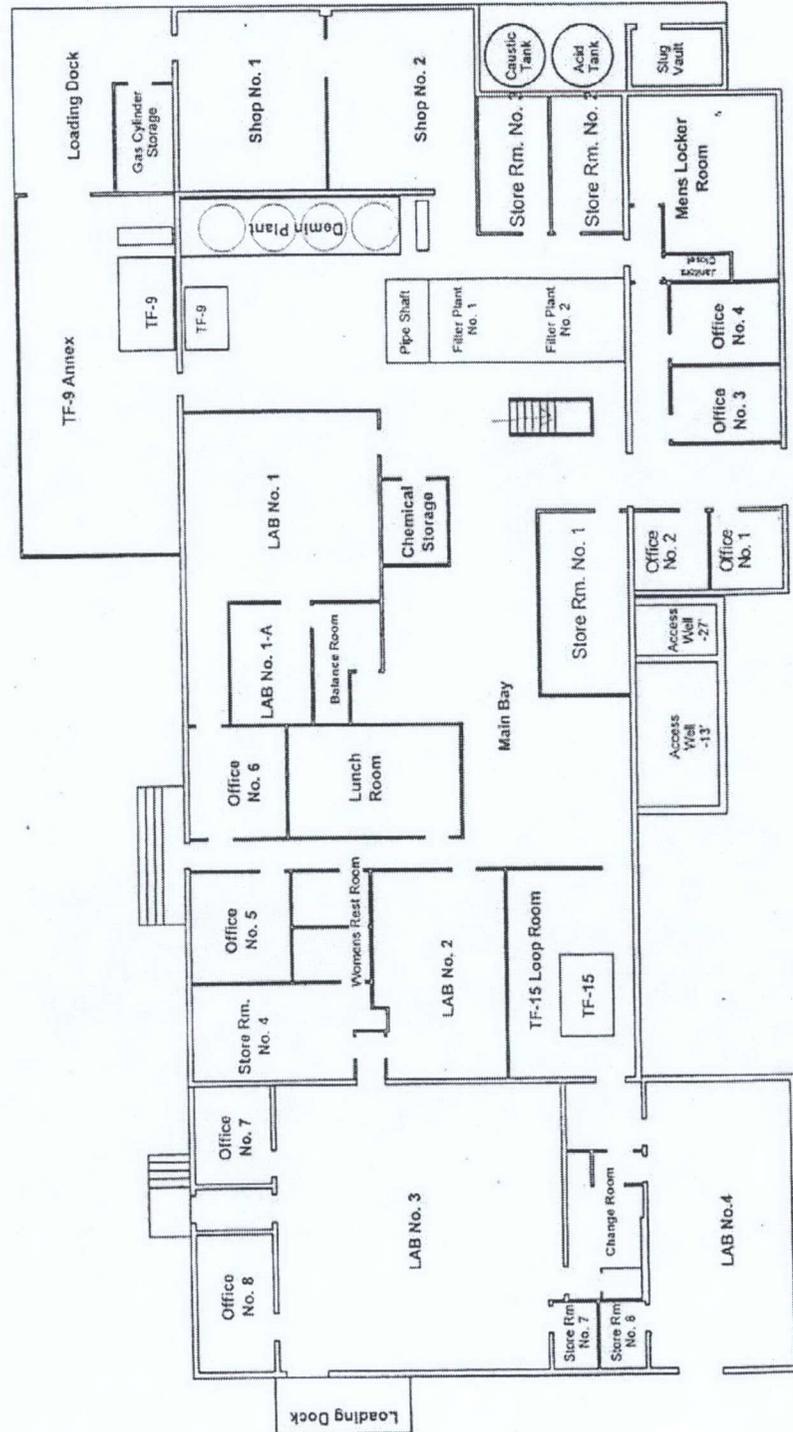
*2 Stacks/Units
DWH ID 196, 176*

| | |
|----------------------|---|
| Name | Water Studies Recirculation Building |
| Number | 1706-KER |
| Location | Located adjacent to the west wall of the 105-KE Reactor. |
| Operational Years | 1955-1971 (K Basin Closure Support) |
| Building Description | A single-story concrete and steel frame structure with approximately 1,075 m ² (11,571 ft ²) of space. It has corrugated transite siding, concrete floors, and flat roof with built-up asphalt and gravel surfacing over cement board and 6.4 mm (¼ in.) steel plate. |
| Status/History | The 1706-KER building contains four shielded cells below-grade, each housing the water treatment, heat exchange, pumping, and remote instrument equipment for each of the four in-reactor loops. These loops are capable of operation to 285° C. (545° F) at 1600 psig. Loop materials are Zircaloy-2 and carbon steel or Zircaloy-2 and stainless steel with in-reactor portions to 6.8 cm (2.7 in.) ID. Appurtenances: The 1706-KEL laboratory, a 251 m ² (2702 ft ²) building adjoins the 1706-KER building. |
| Characterization | Radiological and chemical contamination; unquantified hazardous construction materials |

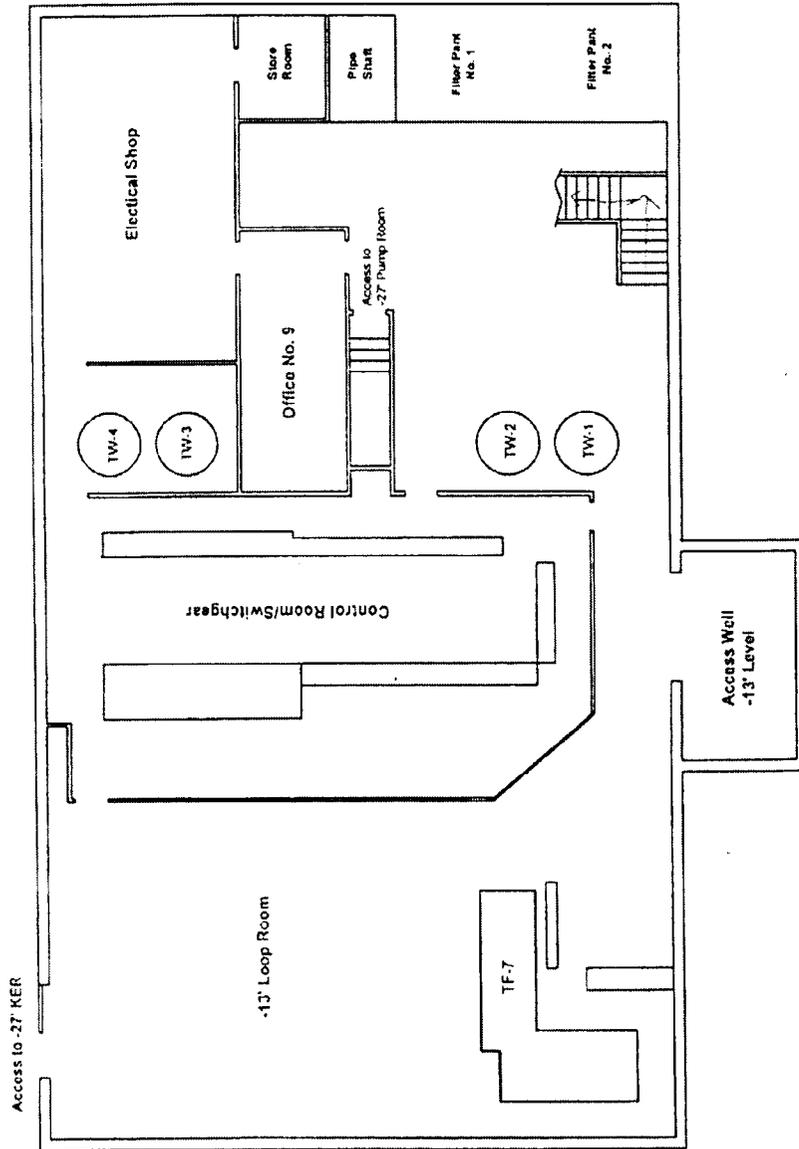
Table A-26

| | |
|----------------------|---|
| Name | Shop Building |
| Number | 1713-KE |
| Location | Located at the northwest corner of the 105-KE. |
| Operational Years | 1955-present |
| Building Description | A sheet metal "butler" building with concrete floor and footings. 74 m ² (797 ft ²) |
| Status/History | Used primarily for storage. |
| Characterization | Unquantified hazardous construction material, radiological contamination |

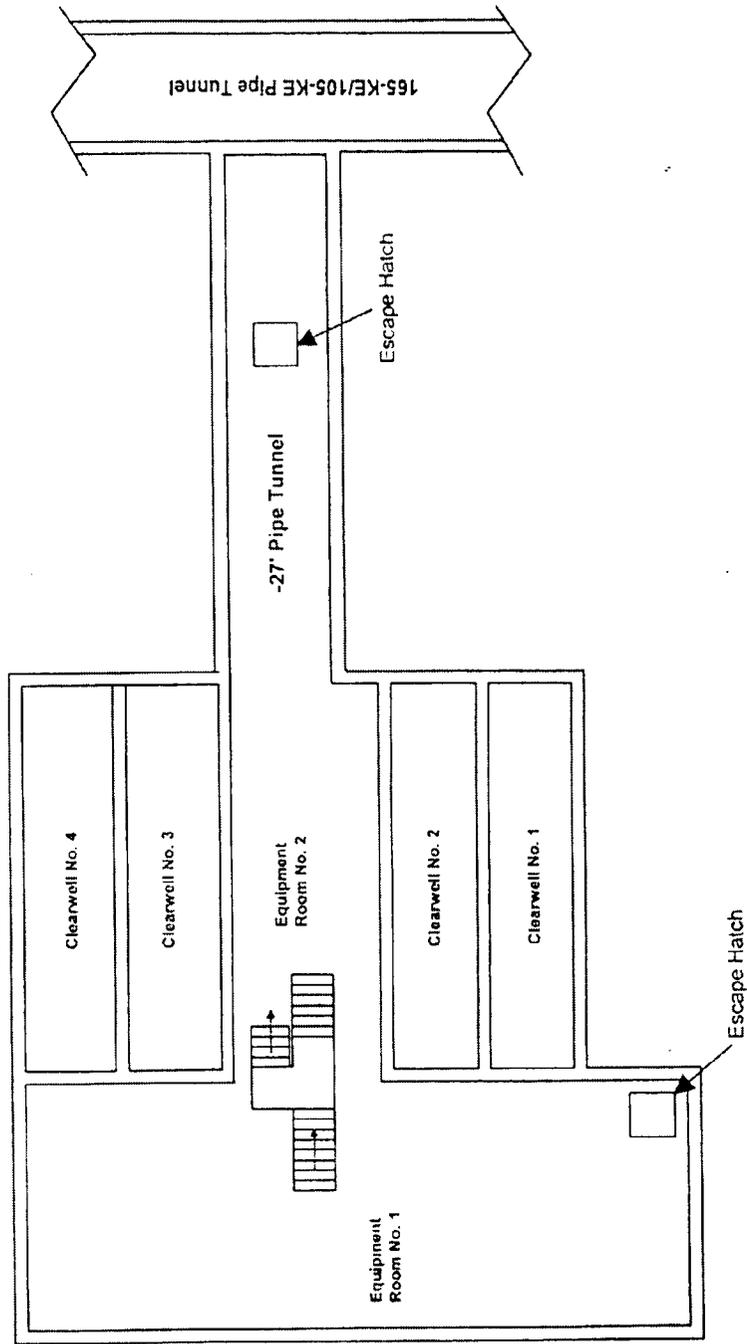
1706-KE AND 1706-KEL 0' LEVEL



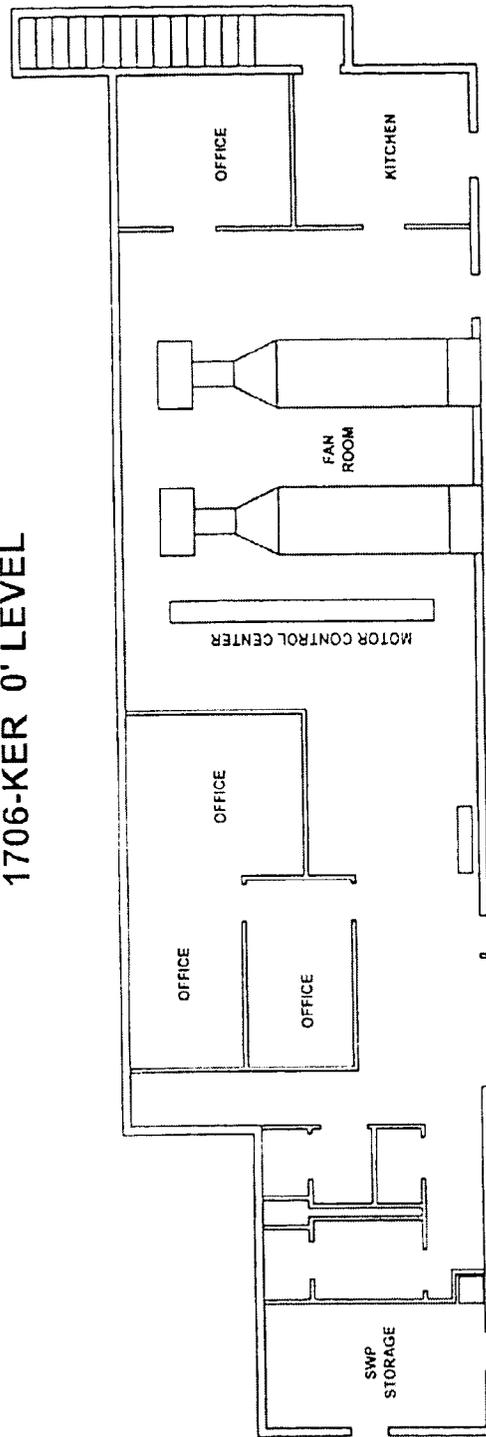
1706-KE -13' LEVEL

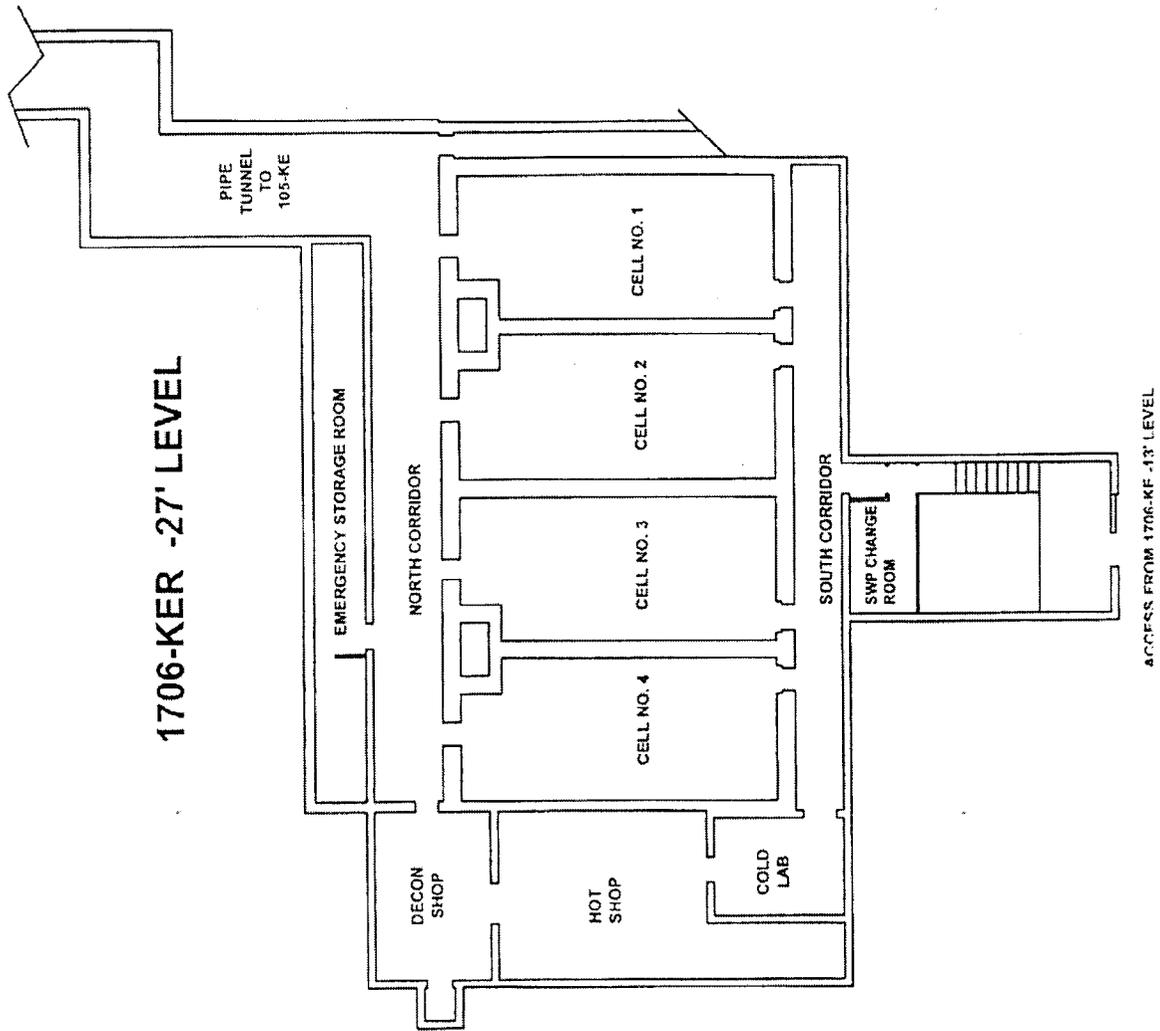


1706-KE -27' LEVEL (PUMP ROOM)



1706-KER 0' LEVEL





Beam, Thomas G

From: Schmidt, John
Sent: Friday, August 12, 2011 2:27 PM
To: Bowers, Holly M
Cc: Doss, Shelly D; Penn, Lucinda L; Beam, Thomas G
Subject: RE: FF-01 Renewal information

Yes, and I always reserve the right to ask additional questions ☺

From: Bowers, Holly M [mailto:Holly_M_Bowers@RL.gov]
Sent: Friday, August 12, 2011 2:14 PM
To: Schmidt, John W (DOH)
Cc: Doss, Shelly D; Penn, Lucinda L; Beam, Thomas G
Subject: RE: FF-01 Renewal information

Understood.

Just to verify we are all now on the same page: we are all agreed then, that what was approved in AIR 11-404 is correct, and you no longer require WRPS to submit any additional information regarding items 6 & 7 on your original list correct?

Thanks!

Holly

From: Schmidt, John W (DOH) [mailto:John.Schmidt@doh.wa.gov]
Sent: Friday, August 12, 2011 2:05 PM
To: Bowers, Holly M
Cc: Doss, Shelly D; Penn, Lucinda L; Beam, Thomas G
Subject: RE: FF-01 Renewal information

Thank you...the renewal came after the letter 11-404 was issued. I was going off the renewal.

From: Bowers, Holly M [mailto:Holly_M_Bowers@RL.gov]
Sent: Friday, August 12, 2011 1:48 PM
To: Schmidt, John W (DOH)
Cc: Doss, Shelly D; Penn, Lucinda L; Beam, Thomas G
Subject: RE: FF-01 Renewal information

John,

We would like to request some official clarification regarding items 6 and 7 on your list of questions below. We are uncertain what this question is actually in regards to and need to know more before we can supply you with the requested information.

In the Renewal materials we submitted, we did request that Cm-244 be removed from the radionuclide requiring measurement lists for EUs 855 (296-A-46), and 856 (296-A-47), however, we did not request, at the time, any changes regarding Cm-244 as it was listed for EUs 735 (296-A-44) and 736 (296-A-45).

In the recent WDOH air approval, AIR 11-404 (NOC ID 802) dated 4/14/11, we did request the removal of Cm-244 from the radionuclide requiring measurement list for all four of these EUs (735, 736, 855, & 856), and the change was accepted. The removal of Cm-244 from the radionuclide requiring measurement lists for all four of these EUs, as requested and approved in the referenced approval, will be reflected in the AOP Renewal Supplemental Materials package which will be submitted later this year.

Please let us know what Cm-244 documentation is being requested in relation to EUs 735 & 736 given the above information.

Thank you.

Holly Bowers

From: Schmidt, John W (DOH) [mailto:John.Schmidt@doh.wa.gov]
Sent: Friday, August 12, 2011 10:11 AM
To: Schmidt, John; Rasmussen, James E; Bates, John A; Beam, Thomas G; Penn, Lucinda L; Doss, Shelly D; Bowser, Dennis W
Cc: Martell, John; Berven, Shawna D (DOH); Utley, Randell J (DOH); McCormick, Ernest R (DOH); zhen.davis@epamail.epa.gov
Subject: RE: FF-01 Renewal information

The department needs additional information to complete the license renewal process in response to your request for the FF-01 renewal (DOE/RL-2011-27, Rev. 0). The additional information needed is detailed as follows:

1. Closure reports are needed for those emission units and Notice of Construction approvals marked in your renewal as being closed. Please provide a schedule detailing when these submittals will be completed.
2. EU 93 (296-A-42) is a major stack. Supporting documentation to allow intermittent operation will need to be submitted. This may result in additional conditions of operation.
3. EU 385 (437-MN&T) Operational Status change looks to be a change in operation of the emission unit process which may trigger a modification. Please provide documentation to support the change.
4. EU 399 (437-1-61) Operational Status change looks to be a change in operation of the emission unit process. If this is the case please provide documentation to support the change.
5. EU 714 (244-CR Vault Passive Filter B) was not installed and when documentation is received it will be removed from the license.
6. EU 735 (296-A-44) please verify Cm-244 is a radionuclide requiring measurement and provide documentation.
7. EU 736 (296-A-45) please verify Cm-244 is a radionuclide requiring measurement and provide documentation.
8. EU 1176 (FFTF PTRAEU's) documentation (NOC revision form) needs to be submitted to support closure of the emission unit and removal from the NOC ID 776.
9. EU (Multiple) closure reports and documentation supporting name changes are needed for requested changes in Enclosure 2, Table 2-1.

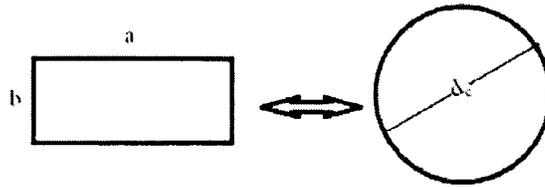
In addition, in section 3.2.1 of the referenced document you have requested to be allowed to implement the clarification of the requirements for annual inspections obtained in November 16, 2005 email from EPA Region 10. Without a basis and to be consistent with past interpretations, WDOH cannot give global approval to allow a timeframe of greater than 12 months to expire when an "annual" requirement is called out by a standard. WDOH will, on a case-by-case basis review requests for alternative approvals and accept or reject these request based on the individual case. The department will be following up with a formal letter documenting this position.

Also, the following changes will be made:

Emission Unit (EU) 63 (696-W-2) stack diameter was requested to be changed to 3 X 1 ft. rectangular. Our database is only set to take stack diameters (an effective stack diameter of 1.83 was calculated for the rectangular stack and will be used. See note below). A note has been placed in the Operational Status as follows "Operations at the Waste Sampling and Characterization Facility involve low level radiological and chemical sample analyses and storage on the Hanford Site. The stack is a 3' X 1' rectangular duct."

EUs 439, 448, 454, 461, 465, 472, 473 Abatement Technology was changed to BARCT.

Note: The equivalent diameter is the diameter of a circular duct or pipe that gives the same pressure loss as an equivalent rectangular duct or pipe.



The equivalent diameter of a rectangular tube or duct can be calculated as:

$$d_e = 1.30 \times ((a \times b)^{0.625} / (a + b)^{0.25})$$

where

d_e = equivalent diameter

a = length of major or minor side

b = length of minor or major side

From: Schmidt, John W (DOH)
Sent: Thursday, August 04, 2011 7:56 AM
To: Rasmussen, James E; Bates, John A; 'Beam, Thomas G'; 'Penn, Lucinda L'; Shelly_D_Doss@RL.gov; 'Dennis_W_Bowser@orp.doe.gov'
Cc: Martell, P John (DOH); Berven, Shawna D (DOH); Utley, Randell J (DOH); McCormick, Ernest R (DOH)
Subject: FF-01 Renewal information

All,

We are doing the completeness review of the FF-01 renewal application and have found some EUs we have questions on. I'll be sending a list sometime next week with questions to be answered. Our current schedule is to have a completeness determination and letter sent to DOE by COB August 21. As a heads-up we will need a schedule of when DOE will be submitting closure documentation for the NOC's and EU's requested to be closed.

Please feel free to call if you have any questions,

John Schmidt
Washington State Department of Health Radioactive Air Emissions
309 Bradley Blvd Suite 201
(Hanford Mail Stop B1-42)
Richland, WA 99352
Phone: (509)946-3874 Cell: (509)727-0644
Fax: (509)946-0876
Public Health - Always Working for a Safer and Healthier Washington Please visit our web site
<http://www.doh.wa.gov/ehp/rp/air/airhm.htm>

RAES TRACKING INFORMATION

(EU, NOC, AU, ALARACT, IM, LB)

All comments or statements are provided as Technical Assistance as allowed under the authority of Chapter 43.05 RCW Technical Assistance Programs 010(3).

Beam, Thomas G

From: Schmidt, John
Sent: Thursday, August 18, 2011 8:15 AM
To: Doss, Shelly D; Martell, John
Cc: Utley, Randell; McCormick, Ernest; Beam, Thomas G; Bowser, Dennis W; Miller, Phillip C; Bowers, Holly M; Penn, Lucinda L
Subject: RE: Emission Units Not Being Closed for FF-01 Renewal

Thank you. We will reinstate these units.

From: Doss, Shelly D [mailto:Shelly_D_Doss@RL.gov]
Sent: Thursday, August 18, 2011 7:51 AM
To: Martell, P John (DOH)
Cc: Schmidt, John W (DOH); Utley, Randell J (DOH); McCormick, Ernest R (DOH); Beam, Thomas G; Bowser, Dennis W; Miller, Phillip C; Bowers, Holly M; Penn, Lucinda L
Subject: Emission Units Not Being Closed for FF-01 Renewal
Importance: High

John,

This email is to inform WDOH the following emission units will not be closed as stated in the FF-01 renewal:

- P-241S102-002, 241-S-102 Inlet Filter, NOC ID 1249
- P-213-W-001, 296-W-3 Waste Compactor, NOC ID 308
- P-296P032-001, 296-P-32, NOC ID 145

Please reinstate these emission units in the FF-01 Renewal as WRPS will be certifying these units in the AOP. WRPS sincerely apologizes for the inconvenience this has caused WDOH.

If there are any questions, please give me a call.

Thank you,

*Shelly Doss
Environmental Permitting & Reporting
WRPS, Contractor to DOE
Office 373-6048*

'He is your friend, your partner, your defender, your dog. You are his life, his love, his leader. He will be yours, faithful and true, to the last beat of his heart. You owe it to him to be worthy of such devotion.' -- Author Unknown

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RADIOACTIVE/AIR TOXICS SCHEDULE INTERFACE
MEETING SUMMARY --- April 11, 2012

ATTENDEES

Robert Anderson, MSA
Tom Beam, MSA
Holly Bowers, WRPS
Phil Gent, Ecology

Bob Haggard, BNI
Lucinda Penn, WRPS
Jim Rasmussen, DOE-RL (YAH)
John Schmidt, DOH

Maria Skorska, Ecology
Pat Wicks, JCI (ARES)
Rodger Woodruff, PNNL

1. Opening Discussion/Old Business

There was no opening discussion or old business.

2. Notice of Construction Status

2a. NOCA Status Updates

The NOC tracking spreadsheet was handed out and outstanding NOCs were stasured. The spreadsheet has been updated as requested and to reflect all other new information received at the meeting. It is attached to the email transmitting this meeting summary. It can also be found on the MSA Environmental Integration (EI) website. Additional updates should be provided to Mr. Robert Anderson.

3. Regulatory Updates/Technical Topics

3a. WEIRD Data Entry for Criteria/Toxic Emissions

Mr. Tom Beam inquired whether Ecology had come to an agency position regarding responsibility for doing the data entry of facility emissions into WEIRD (Washington Emissions Inventory Repository Database). Because the current data system does not include sufficient provisions for certification of the reported data to satisfy AOP requirements, the Hanford Site plans to continue generating a hard copy report for submittal to Ecology on provided forms until WEIRD includes such capability. Mr. Phil Gent indicated that he would like to have the site do its own data entry. Mr. Beam noted that Ecology will need to formally communicate this desire so that MSA can engage DOE in discussions about additional work scope since the regulatory requirements are satisfied by the hard copy submittal. The database is primarily used as a tool for Ecology to meet reporting obligations to EPA. There is a conference call on WEIRD data entry scheduled for April 19, 2012. Additional discussions with Ecology will be necessary.

3b. WAC 173-400 Revision – SIP Submittal

Mr. Beam reported that Ecology HQ was planning to issue a revision to WAC 173-400 for purposes of supporting a subsequent submittal of a revised State Implementation Plan (SIP) to EPA Region 10. He noted that it did not appear that there were any changes of significance impacting the Hanford Site. The primary focus of the changes appears to be updating the incorporation by reference dates and citations in the rule, better integration between Ecology's minor new source review (NSR) program and the prevention of significant deterioration (PSD)/non-attainment NSR major modification/permitting program, and clarification that local clean air agencies must maintain rules that are at least as stringent as Ecology's. Formal issuance for public comment is expected within the next month or so.

**RADIOACTIVE/AIR TOXICS SCHEDULE INTERFACE
MEETING SUMMARY --- April 11, 2012**

3c. Other

No additional regulatory updates or technical topics were raised for discussion.

4. Air Operating Permit (AOP) Status

4a. AOP/FF-01 Renewal

Mr. Gent reported that Ecology and DOH are working on finalizing the draft AOP Statement of Basis. Ecology expects to wrap up incorporation of comments and revisions this week. Mr. Gent is meeting with DOH and Benton Clean Air Agency (BCAA) within the next week to resolve final issues. Ecology is trying to produce a draft AOP that is consistent with the format it uses across the state. A meeting is scheduled for 1pm on April 18, 2012 to go over Ecology's responses and resolution of the site's informal advance comments on the draft AOP sections. Most comments and changes have been accepted, and there are probably only a couple issues where disagreement potentially still exists. Mr. Gent reported that Ecology is targeting late May 2012 to put the draft AOP out for public comment. The public comment period will last 60 days. Following that, Ecology will respond to comments, make final changes and provide the final draft AOP to EPA for review with the goal of issuing the renewed AOP with an effective date of January 1, 2013.

4b. CY2010 Compliance Certification Report Review/Verification

Mr. Gent reported that he will shift his focus back to wrapping up this process once the AOP renewal effort begins to wind down. Mr. John Schmidt reported that DOH has completed its portion of the review/verification and has provided its report to Ecology. Mr. Gent noted that he expects to issue the close out letter sometime in May 2012. No issues of significance have been noted, so the letter should accept the compliance certifications as presented in the report. The letter will likely make some process improvement suggestions that were identified during field verification activities.

4c. Other

Mr. Schmidt reported that DOH expects to have the renewed Hanford Site Radioactive Air Emissions License #FF-01 posted on its website by May 1, 2012.

5. Closing Discussion/Future Agenda Topics

The meeting concluded with agreement that the next meeting will be held on **Wednesday, June 13, 2012** at the Ecology office, **Conference Room 3B at 8:30 a.m.** (located at 3100 Port of Benton Blvd., Richland). Mr. Gent noted that he will be out of the office that day and Ms. Maria Skorska will represent Ecology. Mr. Jim Rasmussen noted that he will need to call in via teleconference, if possible.