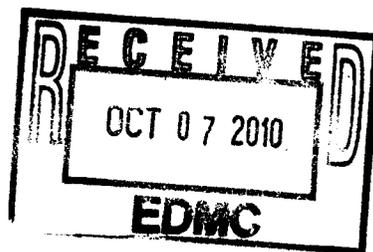




STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

October 5, 2010

Mr. Matthew S. McCormick, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352



Re: Incomplete Applications for Significant Modification of the Hanford Site Air Operating Permit (AOP) and Treatment as Administrative Amendment

Dear Mr. McCormick:

The Department of Ecology (Ecology) has received your transmittals, as referenced below, indicating your wish to undertake significant modification of the Hanford Air Operating Permit (AOP) in accord with Washington Administrative Code (WAC) 173-401-725.

Transmittal of the Notice of Construction for each of your proposed actions initiates license modification to the Washington Department of Health's (WDOH) Radioactive Air Emission License (RAEL) FF-01. However, your transmittals failed to include certifications required by WAC 173-401-725 and by Condition 3.11 of the Hanford AOP Standard Terms and General Conditions. Without the certifications, Ecology cannot consider these transmittals to be complete applications for AOP significant modification.

The RAEL FF-01 change regarding Reference 1 would be implemented by incorporation of a new NOC within the license. When WDOH incorporates your new NOC and license content for this action, Ecology will gladly manage the action as an administrative amendment to the AOP and will do so based upon the information provided in Reference 1 and the revised RAEL FF-01. The effective submittal date for the administrative amendment submittal will be that of WDOH license content issuance. No further submittals to Ecology are required to effect this AOP change.

The RAEL FF-01 change regarding Reference 2 would be implemented by alteration of Emission Unit ID 210 and NOC 707 as existing in the license. Our review indicates that the changed activity of the unit from surveillance and monitoring to deactivation and decontamination will not result in any significant change in monitoring, reporting, or

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recordkeeping conditions, nor violate any applicable requirement. The specific language and conditions to be established by WDOH in RAEL FF-01 will determine whether AOP changes to reflect your proposed action would be administrative in nature or a permit modification. When WDOH incorporates your modified NOC and license content for this action, Ecology will gladly accept a permit modification application or administrative amendment request as is deemed appropriate.

If you have questions, please contact me at (509) 372-7983.

Sincerely,



Doug Hendrickson, P.E.
Lead Air Engineer
Nuclear Waste Program

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References:

1. *Transmittal of Radioactive Air Emissions Notice of Construction (NOC) Application/Air Operating Permit Significant Modification Notification for Retrieval and Disposition Activities for Boxes 80 and 82 for the Transuranic Waste Retrieval Project*, Letter 10-EMD-0093, R. Cory (USDOE-RL) to J. Martell (WDOH) and O. Wang (Ecology), September 10, 2010.
2. *Transmittal of Radioactive Air Emissions Notice of Construction (NOC) Application/Air Operating Permit Significant Modification Notification for Deactivation of the 209-E Building, Critical Mass Laboratory*, Letter 10-EMD-0096, R. Cory (USDOE-RL) to J. Martell (WDOH) and O. Wang (Ecology), September 16, 2010.

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cc: David Brockman, USDOE-ORP
Dennis Bowser, USDOE-ORP
Dale Jackson, USDOE-RL
Stephen Weil, USDOE-RL
Dave Lauer, BCAA
John Martell, WDOH
Administrative Record
Environmental Portal

Laurie Kral, USEPA
Davis Zhen, USEPA
Robert H. Anderson, MSA
Mike Jansky, CHPRC
Fen Simmons, CHPRC
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Andy Ginsburg, ODEQ
Ken Niles, ODOE
Russell Jim, YN