



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Richland Field Office

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November 3, 2023

23-NWP-142

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Agreed Order Document and Acknowledgement of Submittals for the Agreed Order Docket No. 21304, with Comments

References: See page 2

Dear Brian T. Vance:

The Department of Ecology (Ecology) conducted an initial review of RPP-RPT-64081, Revision 0, "241-B-109 Active Ventilation Practicability Evaluation" (Practicability Evaluation) which was submitted on August 23, 2023 (Reference 1).

Ecology determined that the Practicability Evaluation satisfies the requirement in Section V.C.1.i of Agreed Order Docket No. 21304 (Agreed Order) to perform an evaluation to determine the practicability of installing and operating an active ventilation system as an interim leak response action for single-shell tank (SST) B-109. It also satisfies the requirement in Section V.C.1.iv of the Agreed Order to submit this evaluation and notify Ecology of the determination by August 25, 2023.

As required, the Practicability Evaluation addresses potential air permitting requirements under the Washington Clean Air Act, as set forth in Washington Administrative Code (WAC) Chapters 173-400, 173-460 and 173-401.

Based upon the information provided, Ecology approves the evaluation and accepts the determination that active ventilation of SST B-109 at approximately 300 actual cubic feet per minute, with a single-pass system, would not trigger New Source Review requirements under WAC 173-400-110 or require creation of a new emission unit which would need to be specifically addressed in Attachment 1 of the Hanford Site Air Operating Permit (AOP).¹

¹ Section 4.2.2 of the Practicability Evaluation sets forth DOE's determination that radioactive air permitting requirements under Chapter 246-247 WAC, which would be incorporated into Attachment 2 of the AOP, would not render active ventilation of B-109 impracticable. Ecology notes that, under Section V.C.1.iii of the Agreed Order, installation of the active ventilation system on B-109 is not required if DOE determines that such installation would create a new emission point under the AOP. To the extent that DOE has elected to proceed with installation and operation of the active ventilation system despite the possibility that it may create a new emission point under Attachment 2 of the AOP, Ecology does not object.

Ecology also agrees with the determination that it is practicable to implement active ventilation of B-109 as an interim leak response action.

As a result, the United States Department of Energy must submit an Active Ventilation Work Plan for Ecology's review and approval within 90 days of receiving this letter, in accordance with Section V.C.2.i of the Agreed Order. Ecology will review the Active Ventilation Work Plan to evaluate and determine if it is appropriate to install the ventilation system.

Review of the SST System Leak Response Plan (Reference 2) and Active Ventilation Work Plan will be conducted separately.

If there are any questions regarding air permitting requirements, please contact Matt Williams at matt.williams@ecy.wa.gov or (509) 380-1314.

For questions regarding the SST System Leak Response Plan, or more general topics on the Agreed Order, please contact Jeff Lyon at jeff.lyon@ecy.wa.gov or (509) 539-1996.

Sincerely,

Bowen, David
(ECY)

Digitally signed by Bowen,
David (ECY)
Date: 2023.11.03 10:34:32
-07'00'

David B. Bowen
Program Manager
Nuclear Waste Program

mw/lb

cc: See page 3

References:

1. 23-TF-0033, dated August 21, 2023, "Submittal of RPP-RPT-64081, '241-B-109 Active Ventilation Practicability Evaluation,' Rev. 0"
2. 23-TF-0030, dated August 18, 2023, "U.S. Department of Energy Submittal of the Single-Shell Tank System Leak Response Plan"

Brian T. Vance
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cc electronic:

David Einan, EPA
Delmar Noyes, USDOE
Paul Schroder, USDOE
Jon Perry, HMIS
Michael Turner, HMIS
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