



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 20, 2020

20-NWP-087

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

Re: Status of Air Operating Permit Application Associated with Radioactive Air Emissions
License for the Waste Encapsulation and Storage Facility Associated with Letter
20-ESQ-0022

References: See Page 2

Dear Brian T. Vance:

The Washington Department of Ecology (Ecology) received your Air Operating Permit (AOP) Significant Modification Request as Attachment 3 to Letter 20-ESQ-0022 (Reference 1), on February 10, 2020. In this application, the United States Department of Energy (USDOE) requests revision of the Radioactive Air Emissions License (RAEL) FF-01 which Ecology incorporates as Attachment 2 of AOP Number 00-05-006, Renewal 3, for the Hanford Site.

The requested revisions close seven emission units and remove the requirement to operate a heater and demister on the K3 ventilation system. These changes are associated with completion of grouting activities in Hot Cells A through F and grout no longer introducing moisture into the K3 ventilation system after curing. The Washington Department of Health (WDOH) has declared the application to revise RAEL FF-01 complete in Letter AIR 20-311 (Reference 2).

At this time, Ecology cannot determine the final applicable requirements to include in AOP Number 00-05-006 because WDOH has not yet revised RAEL FF-01. In accordance with WAC 173-401-500(4), Ecology requests that USDOE provide additional information within a reasonable time frame to support processing the AOP significant revision. This additional information is a notification that RAEL FF-01 has been revised, once this occurs, and a summary of how the final revisions differ from those proposed in Letter 20-ESQ-0022 if the suggested language is not accepted verbatim.

Please provide this information within 15 days after WDOH issues the updated RAEL FF-01. Ecology is not requesting any additional supplemental information prior to issuance of RAEL FF-01.

If you have questions, please contact me at matt.williams@ecy.wa.gov or (509) 372-7910, or Lilyann Murphy at lilyann.murphy@ecy.wa.gov or (509) 372-7951.

Sincerely,

Williams, Matt
(ECY)

Digitally signed by Williams,
Matt (ECY)
Date: 2020.05.20 11:23:54
-07'00'

Matt Williams, PE
Environmental Engineer
Washington State Department of Ecology

References:

1. Letter 20-ESQ-0022, dated January 31, 2020, "Transmittal of Radioactive Air Notice of Construction Application for the Waste Encapsulation and Storage Facility, DOE/RL-2015-50, Revision 2, License/As Low As Reasonably Achievable Control Technology Revision Requests, Significant Permit Modification Request, Hanford Site Air Operating Permit, Permit Number 00-05-006, Renewal 3, and Notification of Permit Modification"
2. Letter AIR 20-311, Dated March 11, 2020, "Completeness Determination of Revision Application for Waste Encapsulation and Storage Facility (WESF)"

cc electronic:

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Environmental Portal
Hanford Administrative Record
Hanford Facility Operating Record
CHPRC Correspondence Control
MSA Correspondence Control
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control
USEPA Region 10 Hanford Field
Office Correspondence Control