



**U.S. Department of Energy
Hanford Site**

February 25, 2021

21-ESQ-000539

John Martell, Manager
Radioactive Air Emission Section
Washington State Department of Health
309 Bradley Boulevard, Suite 201
Richland, Washington 99352

Dear Mr. Martell:

RESPONSE TO THE WASHINGTON STATE DEPARTMENT OF HEALTH LETTER
AIR-21-101 NOTICE OF FEDERALLY REPORTABLE VIOLATION FOR T PLANT
296-T-7 MISSED CALIBRATIONS (EU 315) – FEDERALLY REPORABLE VIOLATION
CASE # WA000A84100

This is responding to the Washington State Department of Health (WDOH) January 15, 2021, AIR-21-101 letter alleging a Federally Reportable Violation (FRV) on missed calibrations at EU 315. The following attachments provide a series of email communications that took place between the U.S. Department of Energy, Richland Operations Office (RL) and WDOH regarding this alleged FRV. The attachments cited below delineate a continued effort to inform WDOH of delays relating to completion of the required calibration activities for EU 315 and actual completion date for calibration. Additionally, there were no operational activities performed during the time period in question.

Attachment 1 provides an initial email notification to WDOH, dated May 27, 2020, informing them that two of the National Emission Standards for Hazardous Air Pollutants (NESHAP) calibrations (calibration of flow meters of sampling system and calibration of effluent flow measurement devices) were going to be performed late due to COVID-19 restrictions and the number of personnel needed for the calibrations. Attachment 1 further informed WDOH that the calibrations would be completed no later than July 31, 2020.

- Attachment 2 provides a follow-up email to WDOH dated July 23, 2020, providing an update to the initial notification provided in Attachment 1. The update included the change in completion date to “To Be Determined” as the facility required additional work planning assessments to safely execute this work activity while complying with the required COVID-19 controls.

- Attachment 3 provides an email dated, January 25, 2021, notifying WDOH of completion of the calibration activities on January 20, 2021, and of the system's availability for providing the required stack sampling results consistent with the license conditions. Since the last calibration completed in May 2019, no work was performed in 2706-T that required the use of the ventilation and sampling system.

All appropriate notifications regarding the delay and subsequent completion of the required calibration activities have been made through these attachments. As reported in Attachment 3, the last time the 2706-T stack was used was prior to the last NESHAP calibrations performed in May of 2019. On this premise, RL respectfully requests that WDOH consider rescinding the January 15, 2021, letter by closing out the alleged FRV reported in the U.S. Environment Protection Agency Integrated Compliance Information System database. In the event that the entry cannot be fully removed from the database, it is requested that it be closed out noting that the 2706-T stack had not been used in the interim. RL appreciates the cooperation provided by you and your staff bringing this issue to prompt closure.

If you have any questions, please contact me, or your staff may contact Glyn D. Trenchard, Acting Assistant Manager for Safety and Environment, RL, on (509) 373-4016.

Sincerely,

Brian T. Vance Digitally signed by Brian T. Vance
Date: 2021.02.25 14:43:38 -08'00'

Brian T. Vance
Manager

ESQ:AET

Attachments: (3)

cc w/attach:

M. Barnett, PNNL
D. B. Bartus, EPA
L. Bauder, ECY
J. Bell, NPT
S. Berven, WDOH
H. Bowers, WRPS
J. Bramson, CPCCo
R. Buck, Wanapum
F. Carleo, CHPRC
L. Contreras, YN
L. Davies, EPA
M. Demiter, HMIS
D. R. Einan, EPA
J. Hamilton, WRPS

J. Lerch, CPCCo
M. Marrott, CPCCo
J. McAuley, EPA
E. McCormick, WDOH
K. McFadden, EPA
M. Murphy, CTUIR
M. Proctor, CPCCo
J. Schmidt, WDOH
R. Utley, WDOH
J. L. Williams, CPCCo
Administrative Record, TSD: TS-2-7
Environmental Portal, G3-35
HF Operating Record

Attachment 1
21-ESQ-000539

EMAIL, 5/27/20
UPDATED NOTIFICATION TABLE TO
WASHINGTON STATE DEPARTMENT OF HEALTH

(16 pages including cover sheet)

From: [Carleo, Frank J](#)
To: [Martell, John](#); [Schmidt, John](#); [McCormick, Ernest](#); [Frazier, Thomas DOH](#); [Berven, Shawna](#)
Cc: [Teimouri, Alex E](#); [Ferns, Thomas W](#); [Toebe, Wayne E](#); [Schanke, Mark T](#); [Johansen, Stephanie K](#); [Mortensen, A S \(Stuart\)](#); [Atkinson, William H](#); [Hultman, John R](#); [Fullmer, Jonathan V](#); [Vesely, Miranda G](#)
Subject: Updated Notification Table (9) 5-27-20
Date: Wednesday, May 27, 2020 12:41:00 PM
Attachments: [Notification to WDOH \(9\) 5-27-20.docx](#)

John et al.

Given the substantially reduced staffing at the Hanford Site to a minimum of mission-critical, DOE-RL at the recommendation of its contractor CHPRC is providing the attached PDF file for multiple notifications that are to be made both now and potentially in the near future in order to streamline the reporting requirements for both agencies.

DOE-RL Site contractors continue to evaluate the compliance status of the permit Terms and Conditions, and we may need to make additional notifications, as necessary. We believe this will make it easier to track the entirety of the notifications/information provided to the agency and we'll continue to provide any new and emerging compliance issues with WDOH, if and when the circumstances change. Upon return to work, DOE intends to use this same table to close all of the notifications once the Site is placed in an operational posture.

Please see the updated table for delaying two of the Annual NESHAP requirements.

Let us know if you have any questions.

Frank

5-27-2020

Notification to the Washington State Department of Health (WDOH)

John et al.

By this, U.S. Department of Energy (RL) is providing the following notifications resulting from the recently instituted reduced operational activities to a mission-critical and staffing throughout the Hanford Site. At this time, as part of the Site's Min-safe posture, CHPRC is providing only essential personnel for the facilities it manages. The following constitutes a list of projects and compliance requirements consistent with the Terms and Conditions of the FF-01 license.

Stacks – DOE's expectation is that if permit conditions cannot be met at one of the regulated facilities, DOE project and compliance team in working with the CHPRC will make timely notification WDOH, as necessary.

- **Waste and Fuels Facilities** – For these facilities, based on availability of staff, CHPRC will be maintaining all of the compliance items required by the terms and conditions of the permit. The fan and sampling systems will continue to run.

- **Central Plateau Risk Management (CPRM)** – DOE/CHPRC have shut down all of the stacks and sampling systems throughout the entirety of the leave of absence as set forth below in the chart.

Recovery - Upon return to work, the facilities will prioritize missed requirements to ensure sampling defensibility and function of the stack/sampling systems.

NOTE: PUREX and B-Plant will be doing monthly ALARACT door smears (to begin at the end of April) as a verification of contamination control as discussed with WDOH and Wayne Toebe from CHPRC last week

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
B-Plant (B001)	1. Sample Exchanges 2. Gauge Calibrations – Stack Rotameter	1. License AIR 17-1005 (Emission Unit 402). Sample exchanges called out as every two weeks. 2. License AIR 17-1005 (Emission Unit 402) Monitoring and Testing Requirements	1. 4/6/20 2. 4/9/20	1. Upon return to work. TBD 2. Upon return to work. TBD	1. Samples were pulled on 3/23/20, per normal operations. Fans were shutdown that same day and notifications made to WDOH. As a manner of consolidating notifications, please take this as precautionary notification to save time due to the smaller number of personnel working during this time frame. We will continue to update you as details unfold. 2. As a part of the 40 CFR 61, Appendix B, Method 114, Table 2 requirements, the annual "calibrations of flow meters of sampling systems" was missed. The calibrations will be done when the exhaust system is turned back on to ensure that the system is in compliance with this requirement upon restart.		
PUREX (A001)	Sample Exchanges	License requirements under Emission Unit	4/6/20	Upon return to work. TBD	Samples were pulled on 3/23/20, per normal operations. Fans were		

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
		369. Sample exchanges called out as every two weeks.			shutdown that same day and notifications made to WDOH. As a manner of consolidating notifications, please take this as precautionary notification to save time due to the smaller number of personnel working during this time frame. We will continue to update you as details unfold.		
T Plant (T001)	Quarterly Vent and Balance Stack Flow Testing	40 CFR 61, Appendix B, Method 114, Table 2 – Quarterly Requirement	3/31/20	This is expected to get pushed out into early to mid-April timeframe but may be dependent on weather and personnel availability.	We will follow up this notification when the requirement is fulfilled.	4-6-19	The facility was able to complete this requirement to come back into compliance with the NESHAP requirements.
CSB	Quarterly Vent and Balance Stack Flow Test	40 CFR 61, Appendix B, Method 114, Table 2 – Quarterly Requirement	3/31/20	Upon return to work. TBD	We will follow up this notification when the requirement is fulfilled.	4-14-20	The facility was able to complete this requirement to come back into compliance with the NESHAP requirements.
WRAP	<ol style="list-style-type: none"> Unplanned Shutdown due to Electrical Issue Unplanned shutdown due to blown fuse 	<ol style="list-style-type: none"> WAC 246-247-110(18) 40 CFR 61.93(b)(4)(i) 	<ol style="list-style-type: none"> N/A N/A 	<ol style="list-style-type: none"> N/A. Already back up and operational. N/A. Already back up and operational. 	<ol style="list-style-type: none"> The 200W Area of the Hanford Site had experienced an unplanned electrical outage caused by a transformer issue. This issue had caused the W004 exhaust system to shutdown. This put the effluent flows of the system outside of the qualification window, causing the sampling system to be in an over-reporting state. Field personnel were able to restart the fans just a few hours after the outage occurred. <i>Please note that the T001 and T007 stacks were not affected by this outage. Only the WRAP facility had been affected.</i> Electrical issues at the sampling cabinet had caused a fuse to blow on the morning of 5/11/20. This had temporarily created a loss of 	<ol style="list-style-type: none"> N/A. Already back up and operational. N/A. Already back up and operational. 	<ol style="list-style-type: none"> N/A N/A

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
					sampling ability. After trouble shooting the facility was able to replace the fuse and return the sampling system to normal that same day.		
WESF	Continuous Sampling	40 CFR 61.93(b)(4)(i)	N/A	TBD	<p>This is a follow up email to the notification made on 5-15-20 (Friday). Late into the evening of 5-14-20 (Thursday), the WESF facility had experienced a power outage due to the top portion of a power pole snapping off. The exhaust and sampling system are not operating as a result of this. The facility is working to resolve this issue with MSA utilities and work has started, as of 5-18-20, to repair the broken utility pole. We will update you when we know more and power to the exhaust and sampling system is returned. As of right now, repairs on expected to be completed this week.</p> <p>As a result of this unplanned electrical outage, this is going to push the annual K1 HEPA filter aerosol testing out by at least one month. We will let you know when this work is completed.</p>	5-19-20	This notice is to inform WDOH that as of yesterday, 5-19-20, power was restored to the WESF. The exhaust and sampling system are once again operational.
2706T	AIR 17-115, 40 CFR 61, Appendix B, Method 114, Table 2	40 CFR 61, Appendix B, Method 114, Table 2: <ul style="list-style-type: none"> • Calibration of Flow Meters of Sampling System • Calibration of Effluent Flow Measurement Devices 	05/31/20	07/31/20 (Current extension due date.)	<p>Due to the minimum essential staffing at the Hanford Site, the annual calibration of the flow meters for the sampling system and the effluent flow measurement devices will be delayed. These are activities that require a larger number of personnel. In order to follow the recommended CDC guidelines to maintain good social distancing these two calibrations will be</p>		

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
					<p>done when the conditions are better suited to safely complete them. As stated in the previous column, the calibrations have been extended to no later than 07/31/20.</p>		

For any questions, please do not hesitate to contact Alex Teimouri at DOE-RL on 509-282-2311 or the CHPRC Single Point of Contact Wayne Toebe at 509-521-0333, or Jeff Bramson at 509-521-5188.

Attachment 2
21-ESQ-000539

EMAIL, 7/23/20
UPDATED NOTIFICATION TO
WASHINGTON STATE DEPARTMENT OF HEALTH

(7 pages including cover sheet)

From: [Carleo, Frank J](#)
To: [Martell, John](#); [Schmidt, John](#); [McCormick, Ernest](#); [Frazier, Thomas DOH](#)
Cc: [Ferns, Thomas W](#); [Teimouri, Alex E](#); [Thursby, Stacy A](#); [Schanke, Mark T](#); [Toebe, Wayne E](#); [Plager, Christopher L](#); [Hultman, John R](#); [Fullmer, Jonathan V](#); [Fisher, Ryan W](#); [Elkins, Jeanne M](#); [Cathel, Robert L](#); [Singleton, Deborah G](#); [Johansen, Stephanie K](#); [Horn, Sarah R](#); [Vesely, Miranda G](#); [Mortensen, A S \(Stuart\)](#); [Wilbanks, R G \(Rick\)](#); [Atkinson, William H](#); [Marrott, Mitchell P](#)
Subject: Notification to WDOH (13) 7-23-20
Date: Thursday, July 23, 2020 4:05:00 PM
Attachments: [Notification to WDOH \(13\) 7-23-20.pdf](#)

John et al.

Given the substantially reduced staffing at the Hanford Site to a minimum of mission-critical, DOE-RL at the recommendation of its contractor CHPRC is providing the attached PDF file for multiple notifications that are to be made both now and potentially in the near future in order to streamline the reporting requirements for both agencies.

DOE-RL Site contractors continue to evaluate the compliance status of the permit Terms and Conditions, and we may need to make additional notifications, as necessary. We believe this will make it easier to track the entirety of the notifications/information provided to the agency and we'll continue to provide any new and emerging compliance issues with WDOH, if and when the circumstances change. Upon return to work, DOE intends to use this same table to close all of the notifications once the Site is placed in an operational posture.

Please see the updated table for the (1) 2706T date change relating to the NESHAP calibrations, (2) the WESF unplanned outage, and (3) B-Plant closure on notifications previously made.

Let us know if you have any questions.

Frank

7-23-2020

Notification to the Washington State Department of Health (WDOH)

John et al.

By this, U.S. Department of Energy (RL) is providing the following notifications resulting from the recently instituted reduced operational activities to a mission-critical and staffing throughout the Hanford Site. At this time, as part of the Site's min-safe posture, CHPRC is providing only essential personnel for the facilities it manages. The following constitutes a list of projects and compliance requirements consistent with the Terms and Conditions of the FF-01 license.

Stacks – DOE's expectation is that if permit conditions cannot be met at one of the regulated facilities, DOE project and compliance team in working with the CHPRC will make timely notification WDOH, as necessary.

- **Waste and Fuels Facilities** – For these facilities, based on availability of staff, CHPRC will be maintaining all of the compliance items required by the terms and conditions of the permit. The fans and sampling systems will continue to run.

- **Central Plateau Risk Management (CPRM)** – DOE/CHPRC have shut down all of the stacks and sampling systems throughout the entirety of the leave of absence as set forth below in the chart.

Recovery - Upon return to work, the facilities will prioritize missed requirements to ensure sampling defensibility and function of the stack/sampling systems.

NOTE: PUREX and B-Plant will be doing monthly ALARACT door smears (to begin at the end of April) as a verification of contamination control as discussed with WDOH and Wayne Toebe from CHPRC last week

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
B-Plant (B001)	1. Sample Exchanges 2. Gauge Calibrations – Stack Rotameter	1. License AIR 17-1005 (Emission Unit 402). Sample exchanges called out as every two weeks. 2. License AIR 17-1005 (Emission Unit 402) Monitoring and Testing Requirements	1. 4/6/20 2. 4/9/20	1. Upon return to work. TBD 2. Upon return to work. TBD	1. Samples were pulled on 3/23/20, per normal operations. Fans were shutdown that same day and notifications made to WDOH. As a manner of consolidating notifications, please take this as precautionary notification to save time due to the smaller number of personnel working during this time frame. We will continue to update you as details unfold. 2. As a part of the 40 CFR 61, Appendix B, Method 114, Table 2 requirements, the annual "calibrations of flow meters of sampling systems" was missed. The calibrations will be done when the exhaust system is turned back on to ensure that the system is in compliance with this requirement upon restart.	7-22-20 (Notification update made on 7-23-20)	This is to update items 1 and 2 within this row of notifications by acknowledging that the B-Plant sampling system has been calibrated consistent with the requirements of 40 CFR 61, Appendix B, Method 114, Table 2. Both the exhaust and sampling system are now operating under normal conditions, as of late yesterday (7-22-20). Sample exchanges will resume per the AIR 17-1005 requirements.
PUREX (A001)	1. Sample Exchanges 2. Mass Flow Calibrations	1. License requirements	1. 4/6/20 2. 06/2020	1. Upon return to work. TBD	1. Samples were pulled on 3/23/20, per normal		

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
		<p>under Emission Unit 369. Sample exchanges called out as every two weeks.</p> <p>2. 40 CFR 61, Appendix B, Method 114, Table 2 - Check mass flow meters of sampling systems with a secondary or transfer standard – at least quarterly</p>		2. TBD	<p>operations. Fans were shutdown that same day and notifications made to WDOH.</p> <p>As a manner of consolidating notifications, please take this as precautionary notification to save time due to the smaller number of personnel working during this time frame. We will continue to update you as details unfold.</p> <p>2. This notification is with regard to a NESHAP preventative maintenance item that will not be done due to the reduction in staffing on the Plateau. The quarterly requirement to, “Check mass flow meters of sampling systems with a secondary or transfer standard” will not be completed until the sampling and exhaust system is brought back online.</p>		
T Plant (T001)	Quarterly Vent and Balance Stack Flow Testing	40 CFR 61, Appendix B, Method 114, Table 2 – Quarterly Requirement	3/31/20	This is expected to get pushed out into early to mid-April timeframe but may be dependent on weather and personnel availability.	We will follow up this notification when the requirement is fulfilled.	4-6-19	The facility was able to complete this requirement to come back into compliance with the NESHAP requirements.
CSB	Quarterly Vent and Balance Stack Flow Test	40 CFR 61, Appendix B, Method 114, Table 2 – Quarterly Requirement	3/31/20	Upon return to work. TBD	We will follow up this notification when the requirement is fulfilled.	4-14-20	The facility was able to complete this requirement to come back into compliance with the NESHAP requirements.
WRAP	<p>1. Unplanned Shutdown due to Electrical Issue</p> <p>2. Unplanned shutdown due to blown fuse</p>	<p>1. WAC 246-247-110(18)</p> <p>2. 40 CFR 61.93(b)(4)(i)</p>	<p>1. N/A</p> <p>2. N/A</p>	<p>1. N/A. Already back up and operational.</p> <p>2. N/A. Already back up and operational.</p>	<p>1. The 200W Area of the Hanford Site had experienced an unplanned electrical outage caused by a transformer issue. This issue had caused the W004 exhaust system to shutdown. This put the effluent flows of the system outside of the qualification window, causing the sampling system to be in</p>	<p>N/A. Already back up and operational.</p> <p>N/A. Already back up and operational.</p>	<p>1. N/A</p> <p>2. N/A</p>

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
					<p>an over-reporting state. Field personnel were able to restart the fans just a few hours after the outage occurred.</p> <p><i>Please note that the T001 and T007 stacks were not affected by this outage. Only the WRAP facility had been affected.</i></p> <p>2. Electrical issues at the sampling cabinet had caused a fuse to blow on the morning of 5/11/20. This had temporarily created a loss of sampling ability. After trouble shooting the facility was able to replace the fuse and return the sampling system to normal that same day.</p>		
WESF	<ol style="list-style-type: none"> Continuous Sampling Continuous Sampling Continuous Sampling 	<ol style="list-style-type: none"> 40 CFR 61.93(b)(4)(i) 40 CFR 61.93(b)(4)(i) 40 CFR 61.93(b)(4)(i) 	<ol style="list-style-type: none"> N/A N/A. Anomalous event occurred on 5-30-20. System brought up same day. N/A. System was repaired and brought back to normal operation on 7-23-20. 	<ol style="list-style-type: none"> TBD N/A N/A 	<ol style="list-style-type: none"> This is a follow up email to the notification made on 5-15-20 (Friday). Late into the evening of 5-14-20 (Thursday), the WESF facility had experienced a power outage due to the top portion of a power pole snapping off. The exhaust and sampling system are not operating as a result of this. The facility is working to resolve this issue with MSA utilities and work has started, as of 5-18-20, to repair the broken utility pole. We will update you when we know more and power to the exhaust and sampling system is returned. As of right now, repairs on expected to be completed this week. 	<ol style="list-style-type: none"> 5-19-20 5-30-20 7-23-20 	<ol style="list-style-type: none"> This notice is to inform WDOH that as of yesterday, 5-19-20, power was restored to the WESF. The exhaust and sampling system are once again operational. N/A. The system was brought back up the same morning. This notification closes the action. N/A. The sampling system was returned to operational status and is operating as normal.

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
					<p>As a result of this unplanned electrical outage, this is going to push the annual K1 HEPA filter aerosol testing out by at least one month. We will let you know when this work is completed.</p> <p>2. On 5-30-20, the WESF had experienced a loss of power due to the storm that affected the exhaust system. Power was brought back up on the same morning. The system is currently operating as normal.</p> <p>3. Late in the evening of 7-22-20 the sampling system had experienced an unplanned shutdown of the sampling system. After troubleshooting the system, the facility had exchanged the existing vacuum pump for a new one on 7-23-20. The sampling system is now operating, as normal.</p>		
2706T	AIR 17-115, 40 CFR 61, Appendix B, Method 114, Table 2	40 CFR 61, Appendix B, Method 114, Table 2: <ul style="list-style-type: none"> • Calibration of Flow Meters of Sampling System • Calibration of Effluent Flow Measurement Devices 	05/31/20	<p>07/31/20 (Current extension due date.)</p> <p>TBD*</p> <p>*The completion date for this item has been changed to "TBD" as the facility is assessing how to best complete this work activity and follow the required physical distancing to accomplish work safely.</p>	<p>Due to the minimum essential staffing at the Hanford Site, the annual calibration of the flow meters for the sampling system and the effluent flow measurement devices will be delayed. These are activities that require a larger number of personnel. In order to follow the recommended CDC guidelines to maintain good social distancing these two calibrations will be done when the conditions are better suited to safely complete them. As stated in the previous column, the calibrations have been extended to no later than 07/31/20.</p>		<p>7-23-20 Update:</p> <ul style="list-style-type: none"> - See edits made in the "Expected Completion Date" and "Comments/Disclaimers" columns.

Stack	Requirement Missed	Requirement Derived From	Due Date	Expected Completion Date	Comments/Disclaimers	Notification Closure Date	Follow Up Language
Multiple: <ul style="list-style-type: none"> • WRAP • WESF 	<u>WRAP:</u> Continuous Sampling <u>WESF:</u> Continuous Sampling	<u>WRAP:</u> WAC 246-247-110(18) <u>WESF:</u> 40 CFR 61.93(b)(4)(i)	<u>WRAP:</u> N/A. Anomalous event. <u>WESF:</u> N/A.	<u>WRAP:</u> N/A. Anomalous event. System is operational. <u>WESF:</u> N/A. Anomalous event. System is operational.	<u>WRAP:</u> The 200W Area of the Hanford Site had experienced an unplanned electrical outage caused by a failed power pole. This issue had caused the W004 exhaust system to shutdown. This put the effluent flows of the system outside of the qualification window, causing the sampling system to be in an over-reporting state. Field personnel are working with MSA to ensure that the issue is repaired. The system is was brought back online late yesterday and is currently operating as normal. <u>WESF:</u> The 200E area of the Hanford Site had experienced an unplanned electrical outage caused by a separate power pole that had failed. This had caused a partial loss of power to the exhaust system. The system was able to be brought back up less than 4 hours later and the system is currently operating as normal.		

For any questions, please do not hesitate to contact Alex Teimouri at DOE-RL on 509-282-2311 or the CHPRC Single Point of Contact Wayne Toebe at 509-521-0333, or Jeff Bramson at 509-521-5188.

Attachment 3
21-ESQ-000539

EMAIL, 1-5-21
FOLLOW UP NOTIFICATION FOR 2706T NESHAP CALIFICATIONS

(2 pages including cover sheet)

From: [Carleo, Frank J](#)
To: [Williams, Jennifer L](#)
Subject: FW: Follow Up Notification for 2706T NESHAP Calibrations 1-25-21
Date: Monday, January 25, 2021 9:51:09 AM

FYI

From: Carleo, Frank J
Sent: Monday, January 25, 2021 8:54 AM
To: Martell, John <john.martell@doh.wa.gov>; Schmidt, John <john.schmidt@doh.wa.gov>; Frazier, Thomas DOH <thomas.frazier@doh.wa.gov>; McCormick, Ernest <Ernest.Mccormick@doh.wa.gov>
Cc: Schanke, Mark T <mark_t_schanke@rl.gov>; Marrott, Mitchell P <mitchell_p_marrott@rl.gov>; Teimouri, Alex E <alex.teimouri@rl.doe.gov>; Ferns, Thomas W <thomas.fern@rl.doe.gov>; Thursby, Stacy A <stacy.thursby@rl.doe.gov>; Hultman, John R <john_r_hultman@rl.gov>; Fullmer, Jonathan V <jonathan_v_fullmer@rl.gov>; Vesely, Miranda G <miranda_g-vesely@rl.gov>; Toebe, Wayne E <wayne_e_toebe@rl.gov>; Johansen, Stephanie K <stephanie_k_johansen@rl.gov>; Pak, Paul M <paul.pak@rl.doe.gov>; French, Mark S <mark.french@rl.doe.gov>; Ebert, Kelly A <kelly.ebert@rl.doe.gov>; Szendre, Stephen A <stephen_a_szendre@rl.gov>; Petersen, Linda C <linda_c_petersen@rl.gov>; Mortensen, A S (Stuart) <a_s_stuart_mortensen@rl.gov>; Richards, David E (Dave) <david_e_dave_richards@rl.gov>; Berven, Shawna <Shawna.Berven@doh.wa.gov>
Subject: Follow Up Notification for 2706T NESHAP Calibrations 1-25-21

John, Ernest, Randy, and Tom

On May 27, 2020 we notified you via a direct email notification, phone-call, and DOE-RL's Weekly Regulatory Assistance Reporting Table that two NESHAPs calibrations (Calibration of Flow Meters of Sampling System and Calibration of Effluent flow measurement devices) were going to be performed late due to minimum staffing and social distancing issues. At that time the facility committed to completing the calibrations no later than July 31, 2020. On July 23, 2020 we provided a follow up to that notification stating the calibrations were still unable to be performed and the estimated date of completion would be changed to a "TBD" resulting from a large amount of uncertainty. Due to continued effort, as of January 20, 2021 the calibrations were completed and the system is able to provide the required sampling results consistent with the license conditions.

Separate from this effort, DOE and its contractor will be putting together an effort to respond to the AIR 21-101 letter, sent to DOE on or about January 15, 2021, regarding notification of a "Federally Reportable Violation."

NOTE: The facility typically ensures that the NESHAP calibrations are completed in a timely manner from year-to-year. However, condition 6 and 7 of AIR 17-115 requires the ventilation system to be operated only when work with radiological or contaminated material is performed. Record sampling is implemented continuously when this type of work is performed. Since the last calibration (May 2019) no work was performed requiring use of the ventilation and sampling system.

It should also be noted that DOE and the contractors were and continue to be in lengthy

discussions with the regulators concerning the ongoing public health constraints (i.e. social distancing, etc.) and good faith efforts were made on our part.

Timeline:

Because of the reduction of force and social distancing protocols posing limitation on work performance, the facility began work to complete the calibrations in September of 2020. It was at that time that the facility discovered a broken flow element. This created a need to perform a technical evaluation to determine if the system could operate manually, without use of the broken flow element, until the unit was fixed. A part of that evaluation was to determine if compliant sampling could be performed while operating manually. The answer was, "yes." In late October/early November 2020, the facility returned to completing the work package. The work effort included making field adjustments to manually control flow to ensure defensibility. At this time the instrument "out of tolerance" issues surfaced that created a need to contact the vendors on the pertinent changes that were required for the calibrations to pass. The calibrations were performed and passed on January 20, 2021.

Please let us know if you have any questions.

Frank