



0050754

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 28, 1999

Mr. James E. Rasmussen
Environmental Assurance, Permits and Policy Division
Department of Energy/Richland Field Office
P.O. Box 550: MSIN A5-15
Richland, Washington 99352

Dear Mr. Rasmussen:

Re: "99-EAP-293" Request from the U.S. Department of Energy Richland Operations Office to modify Notice of Construction (NOC) Application and Approval Revision forms for the Waste Receiving and Packaging Facility

This letter approves the changes to the Department of Energy's (DOE) Notice of Construction (NOC) Application, DOE/RL-93-18, Rev. 0, and Ecology's Approval Order No. NOC-93-05, as outlined per the attached NOC Revision Forms. The changes document minor corrections to process and equipment descriptions, to reflect the current configuration, and improve operational flexibility of the facility. The testing requirements under the Approval Order Conditions, Paragraph 2, state that testing would be performed as requested by the department (Ecology) to confirm Volatile Organic Compound (VOC) emissions from the Waste Receiving and Processing (WRAP) Facility, do not exceed the levels stated in the NOC. This condition requires VOC sampling, when process flow of waste is sufficient to produce measurable VOC emissions. Processing wastes from the Transuranic (TRU) Waste - Retrieval Project is expected to have the highest potential to produce measurable VOC emissions from the WRAP facility, therefore, Ecology requests notification at least fourteen (14) days prior to initial processing of retrieved waste at WRAP.

27110
34008

This authorization can be modified, suspended, or revoked, in whole or in part, if Ecology determines that any information provided does not ensure that emissions will not exceed ambient air quality standards.

If you have any questions, please contact Jerry Hensley at (509) 736-3017.

Sincerely,

Michael Wilson, Manager
Nuclear Waste Program

Enclosure

MW:JH:ld



cc: Arthur Ingle, DOE
Elizabeth Bilson, DOE
Marcia Rose, DOE
John Winterhalder, WMH
Barry Curn, WMH

Harlan Boynton, WMH
William Adair, FDH
Kirk Peterson, FDH
Russell Jim YIN
Donna Powaukee, NPT

J. R. Wilkinson, CTUIR
Mary Lou Blazek, OOE
Administrative Record:



Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1

Discrepancy:

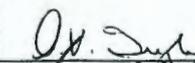
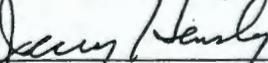
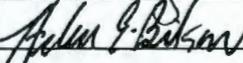
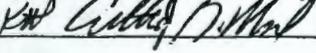
The Description of Operations Section 2.1, paragraph 2 indicates that waste will be received in 55 gallon drums and in boxes as large as 8' by 5' by 5'. The waste will be received in various sized containers up to 85-gallon drums, and the box dimensions are limited to 9' by 5' by 5'.

NOC Revision:

2.1 DESCRIPTION OF OPERATIONS

(2nd paragraph)

The primary function of WRAP 1 will be to handle CH wastes in ~~55-gallon~~ various sized containers up to 85-gallon drums. This will include approximately 38,000 retrieved drums containing suspect TRU waste that were placed in storage beginning in 1970 (called retrieved waste), and transuranic drums generated after WRAP 1 start-up in 1997 (called newly generated waste). A secondary function of WRAP 1 will be to examine and assay newly generated CH waste in boxes as large as ~~2.5~~ 2.7 m (~~8~~ 9 ft) long by 1.5 m (5 ft) wide by 1.5 m (5 ft) high. This boxed waste will not be opened in WRAP 1. If a box is examined and assayed, and found to not meet the acceptance criteria of the permanent disposal facility, the box will be sent to another permitted storage facility in the Hanford Waste Complex to await future processing

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
 4/14/99	 4/15/99	 5/13/99
 4/15/99	 4/19/99	
 4/14/99 Date	Date	Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1.1

Discrepancy:

The Shipping and Receiving Section 2.1.1, paragraph 1 indicates that information pertaining to each container will be entered into the plant management system, including examining shipping manifests for completeness and accuracy. The data (rather than plant) management system does not track results of shipping manifest reviews.

NOC Revision:

2.1.1 Shipping and Receiving

(1st paragraph)

Waste material will be delivered to, and process containers will be shipped from, the WRAP 1 shipping and receiving area by truck on a daily basis. In the shipping and receiving area, boxes and drums of waste are unloaded, visually inspected, bar code labeled, and radiologically surveyed, ~~and the accompanying shipping manifests examined for completeness and accuracy.~~ All information pertaining to each container will be entered into the plant data management system correlated to the bar code identification number.

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>Eric M. Greag</i> 4/14/99	<i>John S. ...</i> 4/15/99	<i>James Hensley</i> 5/13/99
<i>[Signature]</i> 4/15/99	<i>[Signature]</i> 4/19/99	
<i>[Signature]</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1.3

Discrepancy:

The Processing Area Section 2.1.3 indicates drums are only opened in gloveboxes, when a more accurate statement is that incoming waste drums are normally opened only in gloveboxes. In addition, the section indicates that compliant wastes will be sampled in the process gloveboxes, following transfer of non-compliant items to the RWM gloveboxes. Sampling will be done when necessary for either compliant or non-compliant items.

NOC Revision:

2.1.3 Processing Area

Because incoming waste drums are normally opened only in gloveboxes, the airborne contaminants produced at WRAP 1 are expected to be generated in these gloveboxes, which are located in the Processing Area.

The processing Area consists of four glovebox lines: a TRU Waste Process Glovebox, a LLW Process glovebox, a TRU Restricted Waste Management (RWM) glovebox, and a LLW RWM glovebox. Schematics showing the flow of material through the TRU lines and LLW lines are shown on Figure 2-3 and Figure 2-4, respectively. In the process gloveboxes, drums will be opened, the contents sorted and sampled, if necessary, non-compliant items removed and transferred to the RWM gloveboxes, and the remaining compliant wastes ~~sampled and~~ repackaged into new drums.

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>R. E. Quinn</i> 4/14/99	<i>D. V. Sipe</i> 4/15/99	<i>Jerry Hensley</i> 5/12/99
<i>R. C. Boyer</i> 4/15/99	<i>Julia G. Peterson</i> 4/19/99	
<i>Pat Cuthy</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1.3.2

Discrepancy:

Section 2.1.3.2 paragraph 2 indicates containers will only be opened and treated in the RWM lines, when treatment may also occur in the process lines.

NOC Revision:

2.1.3.2 Transuranic Restricted Waste Management Line

(2nd paragraph)

Because the RWM gloveboxes and Process Line gloveboxes are the only places where individual waste packages will be opened and waste items treated, it is anticipated that the majority of the toxic air emissions will be generated in these enclosures. The treatment operations that will take place in the TRU RWM glovebox on the non-compliant waste following receipt of the sample analysis results (and to a lesser extent, the TRU Process Line glovebox when sampling is not required) will include:

Reviewed by Contractor:		Reviewed by RL:		Received by Ecology:	
<i>W. E. M. George</i>	<i>4/14/99</i>	<i>J. V. Suple</i>	<i>4/15/99</i>	<i>Jerry Hendry</i>	<i>5/13/99</i>
<i>R. L. Boyd</i>	<i>4/15/99</i>	<i>John G. Baker</i>	<i>4/19/99</i>		
<i>W. Betty G. White</i>	<i>4/14/99</i>				
	Date		Date		Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1.3.1

Discrepancy:

The Transuranic Waste Process Line Section 2.1.3.1 indicates that operations will be performed inside of the glovebox by using remote controlled manipulators. This includes the use of the glovebox gloves. Also, delete the term "double lid", which occurs in Section 2.1.3.1 and Section 2.1.3.2.

NOC Revision:

2.1.3.1 Transuranic Waste Process Line

Waste process operations will be performed inside of the glovebox by using gloves and remote controlled manipulators. Drums will be loaded into the glovebox through airlock and sealed type entry systems. ~~Non-compliant~~ Non-compliant items will be bar code labeled and transferred to the RWM glovebox using a reusable "bagless" transfer system, and compliant waste will be repackaged into new drums ~~using a double lid transfer system.~~

2.1.3.2 Transuranic Restricted Waste Management Line The TRU RWM glovebox is stainless steel and is approximately 20 feet long by 5 feet wide by 12 feet high. Window, gloveport, ventilation, and manipulator features are similar to those described for the TRU Waste Process Glovebox. The noncompliant wastes will be received from the TRU Waste Process Line in a reusable ~~double lid~~ transfer container

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>Eric M. George</i> 4/14/99	<i>J. V. Sipe</i> 4/15/99	<i>Jerry Husky</i> 4/13/99
<i>Bob Boyer</i> 4/15/99	<i>Adam E. Patton</i> 4/19/99	
<i>Ken Cullin</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

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200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1

Discrepancy:

The Description of Operations Section 2.1, paragraph 3 indicates that containers would have been sampled prior to arrival at WRAP, and that the containers will be equipped with particulate filters. In some cases, the waste may not have been sampled prior to coming to WRAP. The NOC indicated that containers would only be opened inside the gloveboxes. That is normally the case, but there will be exceptions.

NOC Revision:

2.1 DESCRIPTION OF OPERATIONS

(3rd paragraph)

All incoming TRU and retrieved containers will be vented and equipped with ~~particulate filtered vents~~, either vent clips or NucFil™ filters, and the vapor spaces of the retrieved drums will have been sampled prior to receipt at WRAP1. The physical, chemical, and radiological attributes of the newly generated waste is expected to be well known prior to receipt at WRAP 1, while retrieved drums may contain less than fully characterized waste. Whether newly generated or retrieved, in some cases, the waste may not have been sampled prior to coming to WRAP 1. In every case, however, sufficient knowledge of the waste will be obtained by sampling or other means to assure proper management of the waste material. It is expected that any materials that could emit toxic air emissions will come from the small containers (e.g., aerosol cans, one liter plastic bottles) packaged inside of the incoming drums. All incoming waste containers will normally be maintained in closed condition within the WRAP 1 facility, and only opened inside of gloveboxes (gloveboxes are sealed, ventilated stainless steel enclosures designed to confine radioactive and toxic materials. It may be necessary to loosen a lid or replace a damaged lid outside of the glovebox lines, but this would only be done in the process area, which is exhausted through HEPA filters prior to exiting the stack. In addition, waste containers generated at WRAP 1 (e.g. maintenance activities) may be opened to add or remove waste at the point of generation or storage locations.

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>T. J. Erin M. George</i> 4/14/99	<i>John Smith</i> 4/15/99	<i>Jerry Hendley</i> 5/13/99
<i>R. C. [Signature]</i> 4/15/99	<i>Allen G. [Signature]</i> 4/19/99	
<i>W. [Signature]</i> 4/14/99		
Date	Date	Date

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200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1.3.2

Discrepancy:

The NOC indicates that liquid drained from aerosol cans and organic liquids will be repackaged for transfer to storage facilities. Treatment will also be done when possible.

NOC Revision:

2.1.3.2 Transuranic Restricted Waste Management Line

(bullets)

- Aerosol cans will be depressurized and drained. The drained liquids will be retained in containers which will be treated or sent to storage outside the WRAP 1 facility. Vapors from the aerosol cans will be passed through a series of demisters for removal of entrained liquids, and then be vented to the glovebox exhaust
- ~~Spent HEPA filters from incoming drums will be treated with a fixative to immobilize contaminants~~
- Miscellaneous inorganic liquids will be sampled for characterization, and neutralized, if required, and solidified by using cement or other additives
- Miscellaneous organic liquids will be sampled for characterization, and treated or repackaged for transfer to storage facilities pending future treatment
- Corrosive materials present in jugs or jars will be neutralized. After neutralization, the materials will be to liquid solidification, particulate immobilization, or loaded out for storage awaiting treatment outside WRAP 1 facility
- ~~Particulate material not meeting WIPP criteria will be immobilized with cement or plasticizer additives and sealed in a container.~~

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>R. E. M. George</i> 4/14/99	<i>G. V. Singh</i> 4/15/99	<i>Jerry Henley</i> 5/13/99
<i>[Signature]</i> 4/15/99	<i>[Signature]</i> 4/19/99	
<i>[Signature]</i> 4/14/99		
Date	Date	Date

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200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Figure 2-3

Discrepancy:

Figure 2-3 shows the flow diagram for the transuranic gloveboxes. A few minor description changes are needed.

NOC Revision:

Figure 2-3. Flow Diagram Through Transuranic Gloveboxes

The figure indicates that within in the dotted line labeled "Transuranic Waste Processing Glovebox," the path for suspect noncompliance waste is from the "Sorting Table" to "X-Ray" to "Load Out." The "X-Ray" box is not mandatory, and may be bypassed.

The two "Double Lid Transfer Drum" boxes to and from the RWM Glovebox in the figure should be changed to "Transfer Drum."

The path from the RWM "Load Out" box is labeled "empty aerosol can." The label should be "compliant waste (e.g., empty aerosol can)."

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>E. M. Greag</i> 4/14/99	<i>A. J. [Signature]</i> 4/15/99	<i>Jerry [Signature]</i> 5/13/99
<i>[Signature]</i> 4/15/99	<i>[Signature]</i> 4/19/99	
<i>[Signature]</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

Emissions Unit:

200E W-WRAP1-001 (296-W-4)

NOC Title and Approval Reference:

Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Figure 2-4**Discrepancy:**

Figure 2-4 shows the flow diagram for the low-level waste gloveboxes. A few minor description changes are needed.

NOC Revision:**Figure 2-4. Flow Diagram Through Low-Level Waste Gloveboxes**

The two "Double Lid Transfer Drum" boxes to and from the RWM Glovebox in the figure should be changed to "Transfer Drum."

The path from the RWM "Load Out" box is labeled "empty aerosol can." The label should be "compliant waste (e.g., empty aerosol can)."

Reviewed by Contractor:

Reviewed by RL:

Received by Ecology:

RFJ/Erin M. Slagge 4/14/99

Q.N. [Signature] 4/15/99

Jerry [Signature] 5/13/99

AC [Signature] 4/15/99

Adam [Signature] 4/14/99

Bob [Signature] 4/14/99

Date

Date

Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.1.3.3

Discrepancy:

Delete the term "using a double lid transfer system ", which occurs in Section 2.1.3.3.

NOC Revision:

2.1.3.3 Low-Level Waste Process Line The LLW Process Glovebox consists of stainless steel modular gloveboxes that are bolted together in a linear configuration. The overall LLW Process glovebox is approximately 53 feet long by 4 feet wide by 12 feet high. Window, gloveport, ventilation, and manipulator features are similar to those described for the TRU Waste Process Glovebox. Drums will be loaded into the glovebox through airlock and sealed type entry systems. ~~Non-compliant~~ Non-compliant items will be bar code labeled and transferred to the RWM glovebox using a reusable "bagless" transfer system, and compliant waste will be repackaged into new drums ~~using a double lid transfer system.~~

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>Eric M. Greag</i> 4/14/99	<i>J. V. Suple</i> 4/15/99	<i>Jerry Hendley</i> 5/13/99
<i>[Signature]</i> 4/15/99	<i>[Signature]</i> 4/19/99	
<i>[Signature]</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u> 200E W-WRAP1-001 (296-W-4)	<u>NOC Title and Approval Reference:</u> Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0
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Revision: Section 2.2

Discrepancy:

The Description of Ventilation Systems Section 2.2, paragraph 2 indicates that areas, where waste containers are handled only in a closed condition, have essentially no potential for contamination. This is true under normal operations; however, as described in Section 2.1, drums may be opened under limited situations where there is very little potential for contamination.

NOC Revision:

2.2 DESCRIPTION OF VENTILATION SYSTEMS

(2nd paragraph)

Areas of WRAP 1 where waste containers are either not handled, such as the administrative areas, or where waste containers are normally only handled in a closed condition, such as the administrative areas, shipping and receiving areas, and the NDE/NDA areas, have essentially no very little potential for contamination. These areas are considered "uncontrolled" because the air pressure in these areas is not specifically controlled with respect to either atmospheric pressure or other areas of WRAP 1. Exhaust air from these areas is not filtered.

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>J. E. M. George</i> 4/27/99	<i>John E. Baker</i> 4/28/99	<i>Jerry Hendley</i> 4/30/99
<i>H. Bayard</i> 4/28/99	<i>A. V. Singh</i> 4/28/99	
<i>HR Cathy P. White</i> 4/27/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Figure 2-5

Discrepancy:

Figure 2-5 shows the WRAP exhaust stack with spoilers for vortex shedding. These were never installed.

NOC Revision:

Figure 2-5. Exhaust Stack

The figure indicates "Spoilers for vortex shedding forces as required." The vortex shedders shown on the diagram were not required and were not installed. Delete the phrase, the arrow in the figure pointing to the spoilers, and the lines drawn on the stack indicating spoilers.

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>REP Eric M. Greag</i> 4/14/99	<i>D.W. Suple</i> 4/15/99	<i>Jerry Henley</i> 7/13/99
<i>R.C. Spence</i> 4/15/99	<i>Allen P. Peterson</i> 4/15/99	
<i>PA Kelly M. White</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

Emissions Unit:

200E W-WRAP1-001 (296-W-4)

NOC Title and Approval Reference:

Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.4**Discrepancy:**

Section 2.4 paragraph 1 indicates that only 55 gallon drums of waste will be handled, when various sized containers up to 85-gallon will be handled, as described in Section 2.1.

NOC Revision:**2.4 SOURCES OF EMISSIONS**(1st paragraph)

The source term assumes that only 55 gal drums of waste will be handled in such a manner as to potentially release toxic air pollutants as described in Section 2.1. (In some cases, containers other than 55-gallon drums will be handled, e.g., overpacks or smaller containers, but this does not impact the source term calculations). Boxes will not be opened in WRAP 1, and drums will be normally only be opened inside of the gloveboxes. Up to 6,825 drums per year per operating shift, or 20,475 drums per year with 3 shifts operating, will be handled in the WRAP 1 facility (WHC 1992). Of the drums to be processed at WRAP 1, approximately one-third will be expected to be retrieved wastes and approximately two-thirds will be expected to be newly generated wastes.

Reviewed by Contractor:

Reviewed by RL:

Received by Ecology:

JED Eric M. Grogan 4/14/99

A. J. Saylor 4/15/99

Jenny Hendey 7/13/99

A. C. Grogan 4/15/99

John G. Bristow 4/19/99

P. A. Cobby / P. Whit 4/14/99

Date

Date

Date

Hanford Facility NOC Application Revision Form

Emissions Unit:

200E W-WRAP1-001 (296-W-4)

NOC Title and Approval Reference:

Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.4

Discrepancy:

Section 2.4 paragraph 2 indicates that containers (e.g., one liter jugs of liquid, partially full aerosol cans) will be opened only in the RWM gloveboxes. This is normally the case; however, there may be circumstances when these containers are opened in the process glovebox lines as described in Section 2.1.

NOC Revision:

2.4 SOURCES OF EMISSIONS

(2nd paragraph)

The airborne contaminants produced at WRAP 1 are expected to be generated in the gloveboxes, which are located in the Processing Area. The toxic contaminants are expected to be in the forms of particulates and volatile organic compounds (VOCs). The vast majority of the toxic contaminants expected to be encountered in the waste handled in WRAP 1 are containerized within the drums (e.g., one liter jugs of liquids, partially full aerosol cans), and these containers will normally be opened ~~only~~ in the RWM gloveboxes. Therefore, it is expected that that essentially all of the toxic air emissions from WRAP 1 will be generated in the RWM gloveboxes, which are part of ventilation Zone I.

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>R. E. M. Grogan</i> 4/14/99	<i>D. V. Sipe</i> 4/15/99	<i>Jerry Hanley</i> 5/13/99
<i>A. C. B...</i> 4/15/99	<i>...</i> 4/19/99	
<i>...</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Application Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	Nonradioactive Air Emissions Notice of Construction for the Waste Receiving and Processing Facility DOE/RL-93-18, Rev. 0

Revision: Section 2.4

Discrepancy:

Section 2.4 paragraph 3 indicates that Table 2-1 summarizes an estimate of the types and quantities of hazardous materials that will be handled in WRAP 1. Table 2-1 should be deleted and replaced by reference to Table 3-1 and Section 4.0.

NOC Revision:

2.4 SOURCES OF EMISSIONS

(3rd paragraph)

An estimate of the types and quantities of hazardous materials which will likely be handled in WRAP 1, from which toxic air pollutants could be generated, is summarized in Table 2-1 3-1. Any regulated toxic air pollutant could be encountered at WRAP 1. The modeling described in Section 4.0 considered 4 categories of compounds, then assumed the most restrictive ASIL for each category. Impacts from all uncontrolled air emissions were lower than the ASILs for each category. Air emissions could result from the suspension or volatilization of all or portions of these materials during the waste processing steps described in Section 2.1.3.

Note: Delete Table 2-1

Reviewed by Contractor:	Reviewed by RL:	Received by Ecology:
<i>ELM George</i> 4/14/99	<i>J.N. Dwyer</i> 4/15/99	<i>Jerry Hendley</i> 5/13/99
<i>R.C. Sargent</i> 4/14/99	<i>Allen E. [unclear]</i> 4/19/99	
<i>[unclear]</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Approval Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	No. NOC-93-05 Approval of NOC Application for Nonradioactive Air Emissions

Revision: Description Section paragraph 2.

Discrepancy:

The Description Section paragraph 2 indicates that only contact handled waste will be accepted at WRAP. Wrap will accept remote handled waste on a case-by-case basis. In addition, nonradioactive dangerous wastes will be generated and handled at WRAP.

NOC Approval Order Revision:

DESCRIPTION

(2nd paragraph)

2. The solid wastes to be handled in the WRAP 1 facility include nonradioactive dangerous wastes, low-level waste (LLW), transuranic (TRU) waste, ~~and~~ transuranic mixed wastes (TRUMW), and low level mixed wastes (LLMW). The WRAP 1 facility will normally only accept contact handled (CH) waste containers. Contact handled waste is a waste category whose external surface dose rate does not exceed 200 mrem/hr. Remote handled radioactive waste may be received on a case-by-case basis.

Reviewed by Contractor:	Reviewed by RL:	Approved by Ecology:
<i>R. E. M. Greag</i> 4/14/99	<i>John L. ...</i> 4/15/99	<i>Jerry Hendey</i> 5/13/99
<i>...</i> 4/15/99	<i>Julia ...</i> 4/19/99	
<i>...</i> 4/14/99		
Date	Date	Date

Hanford Facility NOC Approval Revision Form

<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	No. NOC-93-05 Approval of NOC Application for Nonradioactive Air Emissions

Revision: Description Section paragraph 3..

Discrepancy:

Description Section paragraph 3 indicates that waste will be received in 55-gallon drums. Waste will be received in various sized containers up to 85-gallon drums.

Discrepancy:

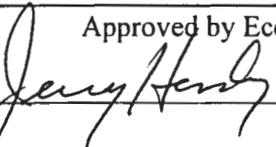
Description Section paragraph 3 indicates that the size of boxes accepted at WRAP is limited to 8' by 5' by 5'. The actual size is 9' by 5' by 5'.

NOC Approval Order Revision:

DESCRIPTION

(3rd paragraph)

3. The primary function of WRAP 1 will be to handle CH wastes in ~~55-gallon~~ various sized containers up to 85-gallon drums. This will include approximately 38,000 retrieved drums containing suspect TRU waste that were placed in storage beginning in 1970 (called retrieved waste). A secondary function of WRAP 1 will be to examine and assay newly generated CH waste in boxes as large as 8 9 ft long by 5 ft wide by 5 ft high. WRAP 1 will contain equipment necessary for non-destructive examination (NDE) of wastes and to perform non-destructive assay (NDA) of the total radionuclide content of the wastes, without opening the outer container.

Reviewed by Contractor:	Reviewed by RL:	Approved by Ecology:
 4/14/99  4/15/99  4/14/99 Date	 4/15/99  4/15/99 Date	 5/12/99 Date

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200E W-WRAP1-001 (296-W-4)	No. NOC-93-05 Approval of NOC Application for Nonradioactive Air Emissions

Revision: Conditions Section paragraph 1.

Discrepancy:

Conditions Section paragraph 1 indicates that opacity from the stack shall not exceed 5 percent as measured by EPA Reference Method 9 as described in 40 CFR 60 Appendix A, dated July 1, 1992. The presence of HEPA filtration eliminates the need for opacity monitoring.

NOC Approval Order Revision:

CONDITIONS

(1st paragraph)

- The exhaust stack height of the WRAP 1 facility shall be at least 46 feet high with a 32-inch circular cross section. ~~Opacity from the stack shall not exceed 5 percent as measured by EPA Reference Method 9 as described in 40 CFR Part 60, Appendix A, dated July 1, 1992.~~ Ecology has acknowledged that opacity monitoring requirements from mixed airborne effluent streams are not necessary due the presence of HEPA filtration abatement technology required by WDOH under WAC 246-247. HEPA filters control particulate emissions to less than visible levels. Because of the particulate control effectiveness provided by HEPA filters, no opacity monitoring is required.

Reviewed by Contractor:	Reviewed by RL:	Approved by Ecology:
<i>Jeffrey M. George</i> 4/14/99	<i>Q.V. Singh</i> 4/15/99	<i>Jerry Hendry</i> 5/13/99
<i>R.C. Borden</i> 4/15/99	<i>Allen G. Birtson</i> 4/19/99	
<i>W.P. ...</i> 4/14/99		
Date	Date	Date

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<u>Emissions Unit:</u>	<u>NOC Title and Approval Reference:</u>
200E W-WRAP1-001 (296-W-4)	No. NOC-93-05 Approval of NOC Application for Nonradioactive Air Emissions

Revision: Conditions Section paragraph 2.

Discrepancy:

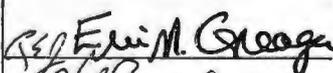
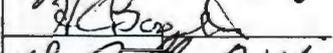
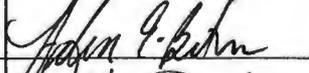
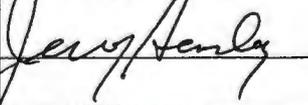
Conditions Section paragraph 2 indicates that Energy shall conduct performance tests for particulates and stack emission tests for VOC. The presence of HEPA filtration eliminates the need for performance tests for particulates. In addition, the Approval Order does not indicate when VOC testing will be conducted.

NOC Approval Order Revision:

CONDITIONS

(2nd paragraph)

2. After start-up of the facility, ~~Energy shall conduct performance tests for particulates~~ Energy also shall conduct stack emission tests for VOC. Because of the particulate control effectiveness provided by HEPA filters, performance tests for particulates will not be required. After these tests, the department may require Energy to conduct an annual test (s) for those pollutants. Energy shall submit a test plan for department's approval at least 45 days before the testing. Testing will be conducted during WRAP 1 operations as requested by the department. Energy and the department shall meet before the testing occurs to discuss test protocol. Testing shall occur only after the department approves the plan. Energy shall notify the department at least 7 days before each test date. Testing results must be reported to the department within 60 days after the test completion. If the department finds the plan was not followed, the department may conclude that the data of the testing results is invalid.

Reviewed by Contractor:	Reviewed by RL:	Approved by Ecology:
  	 	
4/24/99 4/27/99 4/27/99 Date	4/28/99 4/28/99 Date	4/30/99 Date