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**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

05-AMCP-0385

AUG 23 2005

Mr. A. W. Conklin, Supervisor  
Air Emissions and Defense Waste Section  
Washington State Department of Health  
P.O. Box 47827  
Olympia, Washington 98504

**RECEIVED**  
AUG 31 2005

**EDMC**

Mr. O. S. Wang  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Addressees:

REQUEST FOR SIGNIFICANT MODIFICATION TO THE HANFORD SITE TITLE V AIR OPERATING PERMIT (NUMBER 00-05-006), DOWNGRADE OF STACK P-296B001-001

- References: (1) WDOH ltr. to Addressees, from A. W. Conklin, "Department of Health Radioactive Air Emissions Notice of Construction Approval for Operation of the 296-B-1 Emission Unit, AIR 05-604," dtd. June 24, 2005.
- (2) EPA ltr. to K. A. Klein, RL, from R. Albright, "Request to Redesignate the 296-B-1 Stack as a Minor Emission Point," dtd. August 25, 2004.

The U.S. Environmental Protection Agency and Washington State Department of Health have both approved the Notice of Construction for the downgrade of the B Plant Stack from a major to a minor emission point source (References 1 and 2). Therefore, enclosed is a request for a Significant Modification to the Hanford Site Title V Air Operating Permit (AOP) pursuant to Washington Administrative Code (WAC) 173-401-725(4). Enclosure 1 provides the Significant Modification Request Form for a change in status of emission unit P-296B001-001 (Emission Unit ID 402) from a major point source to a minor point source. Specifically, the requested changes are as follows:

- Remove emission unit P-296B001-001 (Emission Unit ID 402) from Air Operation Permit (AOP) Attachment 2, Table 1.1, page 2-37;
- Update AOP Attachment 4, pages 4-2 through 4-8 with a new National Emission Standards for Hazardous Air Pollutants (NESHAP) quarterly status report;
- Add emission unit P-296B001-001 (Emission Unit ID 402) to AOP Attachment 2, Table 1.2;
- Change "Sampling Frequency" from "continuous" to "4 week sample/year;"

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- Change "Radionuclide Requiring Measurement" to "Total Alpha, Total Beta;"
- Change "Monitoring and Testing Procedure" to "Appendix B, Method 114(3);"
- Change "Federal and State Regulatory Requirements" to "40 CFR 61.93[b][4] & WAC 246-247-075[3];"
- Change "Sampling Requirements" to "Record Sample."

Also included in the Significant Modification in Enclosure 2, is a form titled "Notification of Permit Modification Request to the U.S. Environmental Protection Agency, Region 10 (EPA), the Tribes, and Affected States."

The AOP modification process for Significant Modifications is contained in WAC 173-401-725(4). According to this process, the State of Washington Department of Ecology will be responsible to:

- Provide EPA a copy of the permit application;
- Maintain and update the permit register;
- Prepare and publish public notices and/or public hearings;
- Conduct 30 day public and affected states review period;
- Respond to any public and affected state's comments, prepare responsiveness summary, and revise application accordingly;
- Provide to EPA for 45 day review;
- Issue within 15 days after EPA review/approval, or deny the change;
- Update and publish modified AOP as required.

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein  
Manager

AMCP:FMR

Enclosures

1. Significant Modification Request Form
2. Notification to Affected Parties

cc: See Page 3

**Enclosure 1**

**Hanford Site Title V Air Operating Permit  
Request for Significant Modification to the AOP**

**Consisting of 2 pages, including coversheet**

## HANFORD SITE AIR OPERATING PERMIT

### Significant Permit Modification Request

Permit Number 00-05-006

Significant permit modifications are allowed under WAC 173-401-725(4) for those modifications that do not meet the requirements for a minor permit modification or an administrative amendment.

Provide the following information pursuant to WAC-173-401-725(4)

#### **Emission point identification and description of the change:**

P-296B001-001 (Emission Unit ID 402), AOP Attachment 2, page 2-37. In accordance with the approval of the Notice of Construction by the U.S. Environmental Protection Agency and Washington State Department of Health, DOE requests to downgrade the stack from major to minor based on a potential to emit radionuclide air emissions of less than 0.1 millirem per year with a corresponding reduction in monitoring from "continuous" to "4 week sample per year."

#### **Describe the emissions resulting from the change:**

There are no new emissions resulting from the changes described in this significant permit modification request.

#### **Describe the new applicable requirements that will apply as a result of the change:**

New applicable requirements include:

- Sampling frequency [WAC 246-247-075(3)] [WAC 173-401-615(1)]: 4 week sample/year,
- Sampling requirement [WAC 246-247-075(3), WAC 173-401-615(1)]: record sample,
- federal regulatory requirement: 40 CFR 61.93[b][4],
- state regulatory requirement: WAC 246-247-075[3],
- monitoring and testing procedure: Appendix B, Method 114(3), and
- radionuclides requiring measurement [WAC 173-401-615(1)]: Total Alpha, Total Beta

#### **Suggested Draft Permit Language:**

*for example:*

- *Monitoring/PCM that will be used to support compliance determination/certification*
- *Description of air pollution control equipment (abatement technology)*
- *Other controls such as limits on inventory, process limits such as throughput, hours of operation, or acceptance criteria, or other assumptions used in Potential to Emit calculations*
- *Other process descriptions that constitute a term or condition, such as reporting or recordkeeping requirements.*

No suggested language.

**Enclosure 2**

**Hanford Site Title V Air Operating Permit  
Notification of Permit Modification Request to the U.S. Environmental Protection Agency,  
Region 10, the Tribes, and Affected States**

**Consisting of 2 pages, including coversheet**

**NOTIFICATION OF PERMIT MODIFICATION REQUEST TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 10, THE TRIBES, AND AFFECTED STATES**

Attached is a request to revise the Hanford Site Air Operating Permit. This form serves as notification to EPA, tribes, and affected states of a request for an Air Operating Permit Modification per WAC 173-401-725(2), (3) and (4).

<b>Air Operating Permit Number:</b> 00-05-006	
<b>Source:</b> U.S. Department of Energy, Richland Operations, Hanford Site	
<b>Mailing Address:</b> P.O. Box 550 Richland, WA 99352	<b>Physical Address:</b> 825 Jadwin Ave. Richland, WA 99352
<b>Brief Description:</b>  <p>The U.S. Environmental Protection Agency and Washington State Department of Health have approved the Notice of Construction for the downgrade of the B Plant Stack to a minor emission point. Therefore, the purpose of this significant modification to the Hanford Site Air Operating Permit is to change the status of emission unit P-296B001-001 from a National Emission Standards for Hazardous Air Pollutants (NESHAP) designated stack to a minor, non-designated stack. This change will result in a decrease in monitoring from continuous to a 4-week sample per year.</p> <p>Based on results from measurements taken upstream of the high efficiency particulate air (HEPA) filters, the potential to emit radionuclides from this stack is less than 0.05 mrem/year. A stack is considered to be a NESHAP designated stack if the potential to emit radionuclides results in an impact to the maximally exposed individual (MEI) of 0.1 mrem/year or greater. Based on results from measurements taken upstream of the high efficiency particulate air (HEPA) filters, the potential to emit radionuclides from this stack results in an impact to the MEI of less than 0.05 mrem/year. No new activities are anticipated to occur at P-296B001-001 that will increase the potential to emit.</p>	
<b>Contact Name:</b> Matthew S. McCormick	<b>Phone:</b> 509-373-9971
<b>Title:</b> Assistant Manager for the Central Plateau U.S. Department of Energy, Richland Operations Office	
<b>FOR ECOLOGY USE ONLY</b>	
<b>Application Number</b>	<b>Date Received</b>
<b>Ecology Contact</b>	
<b>Date of Publication in Permit Register</b>	<b>Public Comment Period Ends</b>

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cc w/encls:

G. Bohnee, NPT  
L. J. Cusack, Ecology  
D. W. Hendrickson, Ecology  
R. Harris, CTUIR  
R. Jim, YN  
T. M. Martin, HAB  
K. Niles, ODOE  
J. Schmidt, WDOH  
D. Zhen, EPA  
Administrative Record (B Plant Stack  
Downgrade)  
Environmental Portal

cc w/o encls:

B. M. Barnes, FHI  
J. A. Bates, FHI  
L. P. Diediker, DFSH  
R. H. Engelmann, DFSH  
L. L. Fritz, FHI  
N. A. Homan, FHI  
D. L. Johnson, FFS  
G. J. LeBaron, FHI  
E. J. Murphy-Fitch, FHI  
K. A. Peterson, FHI  
F. M. Simmons, FHI