

This document was too large to scan as a single document. It has been divided into smaller sections.

Section 2 of 3

Document Information			
Document #	DOE/RL-2003-27	Revision	0
Title	HANFORD SITE AIR OPERATING PERMIT ANNUAL COMPLIANCE CERTIFICATION REPORT FOR THE PERIOD 01/01/2002 THROUGH 12/31/2002		
Date	06/01/2003		
Originator		Originator Co.	DOE-RL
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Keywords			
Projects			
Other Information			

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<p>Rods (TPBARs): The eight TPBARs are approximately 0.96 centimeters (0.38 inch) in diameter with Type 316 stainless steel cladding. Each full length TPBAR contains twelve pencil assemblies. Each pencil is 12-inches long and is composed of an inner liner of Zircaloy-4, six lithium aluminate (LiAlO₂) pellets and a tritium getter (collector) of nickel-plated Zircaloy-4 (NPZ). Getter disks of NPZ are also located at the top and bottom of the pencil column. The eight TPBARs were irradiated in the Watts Bar Nuclear Plant from October 1997 through February 1999. Short-lived activation products from the irradiation of these TPBARs will have decayed significantly during the one-year period between irradiation and proposed examination. No additional radioactive decay is assumed to occur during the TTQP activities. Argonne National Laboratory (ANL-W) will section the TPBARs into approximately 4-foot long sections. The sectioned target rods will be placed in airtight tubes with an argon cover gas for shipping to Pacific Northwest National Laboratory (Pacific Northwest). Pacific Northwest will receive the tritium target rods at the High-Level Radiochemical Facility (HLRF) within the 325 Facility where additional sectioning of the rods and component separation will occur.</p> <p>Basic Program Activities: The three basic program activities, described in AIR 97-307, will remain unchanged. The activities include 1) TPBAR sectioning, 2) tritium extraction and analysis, and 3) ex-reactor tritium permeation tests.</p> <p>1. TPBAR Sectioning: Activity 1 of the TTPQ will include sectioning TPBARs in the HLRF. Sections will be cut from the tritium target rods for quantitative analysis using a diamond saw within Plexiglas containment. Each section will be disassembled in the Shielded Analytical Lab (SAL), and the components will be analyzed for lithium burn up as well as tritium,</p>		

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<p>helium and hydrogen content in Rooms 416 and 420. The sections will also be subjected to protium, metallography, and microprobe studies. Emissions as a result of sectioning of the rods in the hot cells of the HLRF will be vented directly to the existing exhaust system and eventually to the main exhaust stack.</p> <p>2. Tritium Extraction and Analysis: In Activity 2, tritium will be extracted by heating either a 4-foot length TPBAR or components from the TPBAR sections in the presence of a sweep gas. Following tritium extraction the 4-foot length TPBARs will be sectioned and analyzed as described in Activity 1. Tritium extraction and analysis will be performed at two separate locations within the 325 Facility. Small-scale tritium extraction tests will be performed in Room 416, while full tritium-rod extraction tests will be conducted in the hot cells of the HLRF. Radionuclide emissions not captured during the tritium extraction tests will pass through a laboratory hood or glove box to the existing ventilation system and eventually to the main exhaust stack.</p> <p>3. Ex-reactor Tritium Permeation Tests: Activity 3 includes measurements to determine the cladding material permeability used in the TPBARs. The test is conducted in an enclosed test loop, a section of which will be constructed from TPBAR cladding material. Tritium absorption/release kinetics validation, correlation development and hydrogen ingress characterization, safety testing, and mechanical testing will also be conducted. The tritium permeation tests will be performed in Lab 48 in the basement of the 325 Building. Radionuclide emissions not captured during the permeation tests will pass through a laboratory hood or glovebox to the existing ventilation system and eventually to the main exhaust stack.</p>		
<p>This NOC does not have "Annual Possession Quantity" limits.</p>	<p>Not Applicable</p>	<p>CDM: Not applicable.</p>

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		<p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>This condition was obsoleted on 8/14/02. The approved process activities include the sectioning of eight Tritium Producing Burnable Absorber Rods (TPBAR) tritium extraction and analysis, and the extraction and permeation testing.</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment:</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Implementation of the "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspection", dated July 2001. The MOU defines, at a site-wide level, the roles and responsibilities for regulator access to the Hanford Site. SBMS subject area "External Regulatory Inspections (ES&H)" further defines the roles and responsibilities at a contractor level for hosting, conducting, and documenting external regulatory inspections.</p>
<p>Tritium emissions are to remain below 1.8E+3 curies. This total includes 379 Ci (rods currently approved) + 1.42E+3 Ci (additional eight TPBARs) for a total of 1.8E+3 Ci.</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: The "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002", DOE/RL-2003-19, was reviewed to verify the tritium emissions were below the NOC limits.</p>
<p>The project began January 2000 and will extend through the year 2003.</p>	<p>Continuous</p>	<p>CDM: Personnel interview.</p> <p>Comment: TTQP operations were conducted during the reporting period. Note: An extension of the TTQP was approved by WDOH in June 2002.</p>
<p>The inventory of commercial H-3 may only increase from 1,000 Ci to 3,000 Ci.</p>	<p>Continuous</p>	<p>CDM: Personnel interview.</p> <p>Comment: Verified that the initial 1,000 Ci of tritium were brought into RPL in a Type A container. This material remains in the Type A and has not been opened since the date it was received. The additional 2,000 Ci of tritium that was proposed in the NOC modification was</p>

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		never brought onsite. The permeation testing that this tritium-bearing material was to be used in was not conducted at RPL during the reporting period.
<p>The sampling system shall consist of an isokinetic sampling probe. The exhaust flow rate is to be a nominal rate of 61m³/sec. Emission shall be monitored for H-3 using a 2-stage silica gel collector.</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Sampling system information is maintained on the Effluent Management's web page under: "300 Area Facility Radionuclide Emission Points and Sampling Systems." A six-nozzle isokinetic probe has been installed to collect exhaust samples. Exhaust flowrate is measured quarterly and is very stable: ~140K CFM or ~66m³/s. Tritium samples are collected on two stage columns (RPL Facility Effluent Monitoring Plan and EM-AIR-011, Stack Tritium Sampling Procedure).</p>
<p>Equipment and procedures for continuous monitoring shall conform to ANSI N13.1. The specific design must be approved by the department prior to installation. The department prior to construction must approve any deviation from ANSI N13.1 (WAC 246-247-075(2)).</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Sampling system information is maintained on the EM web page under: "300 Area Facility Radionuclide Emission Points and Sampling Systems." This demonstrates how the sampling system meets the ANSI N13.1 requirements. EM-QA-01, "Effluent Management Quality Assurance Plan", outlines the processes used in performing radiological stack sampling at PNNL. This document is based on the requirements of 40 CFR 61, Method 114, and specifies requirements for performing work in accordance with procedures based on ANSI N13.1. These requirements are transmitted to the RCT organization via a SOW to identify requirements for sampling activities. The sampling system was installed and operational before issuance of this condition; therefore the design was not approved by the WDOH before installation.</p>
<p>Molecular sieves may be used until the exhaust gas as measured with an ion chamber indicates the sieves approaching a breakthrough. Disposal of spent molecular sieves must be in compliance with Pacific Northwest's radioactive waste management procedure.</p>	Continuous	<p>CDM: Personnel interview.</p> <p>Comment: Confirmed with research staff that the ion chamber was used to provide indication of breakthrough. All wastes submitted for disposal were through the Waste Operations group. Note: All wastes are handled in accordance with operating procedures. Operational procedures specific to HWTU are labeled HWTU-XXX and general packaging/shipping/etc. applicable to all rad waste operations RWO-XXX. These are maintained on the Waste Operations web page. Verified with the Radioactive Waste Operations Manager that these procedures are followed in operations at HWTU.</p>
<p>This condition was obsoleted on 8/14/02. The annual possession quantity for the radionuclides for the eight TPBARs is enclosed.</p>	Not Applicable	<p>CDM:</p> <p>Comment:</p>

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<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: Personnel interview / records review.</p> <p>Comment: Use and maintenance: RCTs are responsible for the collection of samples and operating monitoring equipment. These personnel are trained to procedures (located on the EM web page) for these activities. Evidence of training to these procedures is maintained with the Laboratory Training group. Air Balance personnel are responsible for the efficiency testing and replacement of HEPA filters. This testing is performed in accordance with Air Balance procedures located on the F&O web page. Evidence of training to these procedures is maintained with the Laboratory Training group. Emergency Response: The Emergency Preparedness group trains the building emergency directors (BEDs) via PNNL courses 402, 403, and 404. Under each BED is a response organization (BERO); these personnel are trained under course 405. Training records are maintained with Laboratory Training. Emergency preparedness exercises are conducted on a scheduled basis to evaluate performance. Evaluations are maintained with the EP group.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: Not applicable.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>This condition was obsoleted on 8/14/02. This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)) and will at that time, constitute a revision of the Radioactive Air Emissions License.</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment:</p>
<p>The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).</p>	<p>Not Applicable</p>	<p>CDM: Not applicable.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Compliance to this condition is demonstrated</p>

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		through the implementation of PNNL's Laboratory Policies and Standards (http://sbms.pnl.gov/common/c100d010.htm) and the documents referenced in the "Approval Order AIR 00-208 Procedure Matrix" maintained in the Effluent Management project record file.
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in the NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: Not applicable. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13)) and (WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.	Continuous	CDM: Records review. Comment: Data collected through support organizations are coordinated through SOWs that outline project expectations for collection and reporting of data: Airborne Radionuclide Emission Sample Analysis Statement of Work (sample analysis), Airborne Radionuclide Emission Sampler and Monitor Operations Statement of Work (Collection of samples, daily inspections, and delivery to laboratory), Effluent Sampling and Monitoring Support-Memorandum of Agreement (performance of stack flow measurements and maintenance of equipment), and Memorandum of Agreement for Calibration Services (calibration of rotameters and vacuum gauges). Note: All of these documents are maintained on the EM web page.
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).	Continuous	CDM: Operational procedure. Comment: Retention period is specified in the Effluent Management Quality Assurance Plan (EM-QA-01) and also identified in the EM Records Inventory and Disposal Schedule (RIDS).
The department reserves the right to inspect and audit this unit during operation. This includes all activities, equipment, operation procedures, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	CDM: Not applicable. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Approval is given to analyze eight additional (TPBARs) containing approximately 88,000 Ci of tritium. The rods must decay a minimum of one year from the time of irradiation to	Continuous	CDM: Personnel interview. Comment: Only four of the projected eight TPBARs were received at PNNL for extraction analysis. The

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the proposed examination.		activities performed during the reporting period were consistent with the NOC description (sectioning, extraction, analysis, and permeation testing). The rods were irradiated in March 1999 and received in the summer of 2000.
Sectioning of the TPBAR rods must be performed in the hot cells in HLRF. Sectioning must be done inside Plexiglas containment.	Continuous	CDM: Personnel interview. Comment: All sectioning of rods was performed inside the HLRF hot cells and inside a plexiglass containment (that was located inside the hot cell).
Tritium extraction and analysis activities are limited to the hot cells in HLRF and to small-scale extractions in Room 416.	Continuous	CDM: Personnel interview. Comment: All tritium extraction was performed inside of the hot cell. Analysis of the gas stream was conducted in room 611A and B (both inside the HLRF). These areas were reviewed by WDOH during a pre-start inspection in April 2002. Small-scale extractions were also performed in room 416 as stated in the NOC.
The facility shall make requested documents available for timely review (WAC246-247-080(10)).	Continuous	CDM: Records review. Comment: Records requested for review during WDOH Level II inspection on May 23, 2002. Provided within the requested timeframe. Inspection closed with no findings on June 13, 2002.
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), ALARACT (paragraph 4), or any limitations included in this approval (paragraph 5) or the original Tritium Target Qualification Notice of Construction approval (letter # AIR 97-307).	Not Applicable	CDM: Records review. Comment: No reports were required.
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	CDM: Records review. Comment: Retention period for Rad Air records is specified as part of the Effluent Management Quality Assurance Plan, EM-QA-01. Retention periods are

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		further documented in the EM project files under the Records Inventory and Disposal Schedule (RIDS).
The tritium permeation testing shall be conducted in room 48 of the basement in the laboratory hood or glovebox.	Not Applicable	<p>CDM: Personnel interview.</p> <p>Comment: Although the activity was permitted under approval order AIR 00-208, it was never performed under TTQP operations.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: Records review.</p> <p>Comment: Abated emissions are included in DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that emissions data previously submitted by PNNL was included in the report.</p>
The "Mandatory Use Procedures" require that each step be read prior to performing the activity. These procedures are those that involve the following: * Operation of the furnace and gas clean-up system used to extract tritium from the Tritium Producing Burnable Absorber Rods and; * The transfer of the extracted tritium to hydride transport vessels.	Continuous	<p>CDM: Personnel interview / records review.</p> <p>Comment: These activities are captured under procedure TTQP-5-005. During the reporting period, operations were performed under revision 6 of this procedure.</p>
The required emission control technology consists of mandatory use procedures, control valves, two molecular sieves, and two stages of testable HEPAs. In Room 416, two stage bladder traps in series must be used. The uranium getter material must be uranium hydride.	Continuous	<p>CDM: Personnel interview / records review.</p> <p>Comment: There is a final bank of HEPA filters located in the equipment room off the northwest corner of the RPL. Individual laboratory processes (Laboratory) are also filtered by a "primary" stage of HEPA filtration, these filters are located in the basement area of RPL. (Drawing H-3-70230). Confirmed with research staff on 4/2/03 that the other listed controls were in place during operations.</p>
This condition was obsoleted on 8/6/02. When this project is completed, or operations cease, the facility shall notify the department via a report of closure, and indicate whether or not any potential for airborne release occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment:</p>
Project activities are limited to High Level Radiochemical Facility (HLRF), Shielded Analytical Laboratory (SAL), and Rooms 420, 418, and Room 48 in the basement.	Continuous	<p>CDM: Personnel interview / records review.</p> <p>Comment: Discussed with researcher on 4/2/03. TTQP operations were conducted within the areas specified in the Permit approval. Note: Room location 418 should be identified as room 416 as indicated in the NOC</p>

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		application, and room 421 should be 420. An administrative amendment will be submitted to correct this inaccuracy.
This condition was obsoleted on 8/14/02. Potential-to emit abated (total effective dose equivalent to the maximally exposed individual): 0.1 mrem/year.	Not Applicable	<p>CDM: N/A.</p> <p>Comment:</p>
This condition was obsoleted on 8/14/02. Control Technology: 2 - high efficiency particulate air filters (2 in series), 3 fans (2 in parallel, 1 backup. Additional controls: Two stage bubbler-type trapping system, molecular sieve.	Not Applicable	<p>CDM: N/A.</p> <p>Comment:</p>
This condition was obsoleted on 8/14/02. Stack measurement: Continuous measurement. Additional measurement: Tritium sampling using a 2-stage silica gel collector.	Not Applicable	<p>CDM: N/A.</p> <p>Comment:</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting requirements which are no longer applicable for that emission unit or activity.</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

NOC: 325 Building Hazardous Waste Treatment Unit **Permit:** AIR 02-809 **Date:** 08-22-2002 **NOC ID:** 302
Date In AOP: 08-27-2002

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<p>The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).</p>	<p>Intermittent</p>	<p>CDM: Review of compliance status for each approval condition listed for this approval order.</p> <p>Comment: Intermittent compliance reported for this condition, since three other conditions of this license are reported as intermittent.</p>
<p>The total abated emission limit for this Notice of Construction is limited to 1.10E-01 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 1.10E+01 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).</p>	<p>Intermittent</p>	<p>CDM: Records Review</p> <p>Comment: The "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002", DOE/RL-2003-19, was reviewed to verify the abated emissions from the 325 Building were below the NOC limits. The NESHAPS inventory of radioactive materials is conducted for PNNL facilities on an annual basis in accordance with PNL-10855, "Assessment of Unabated Facility Emission Potentials for Evaluating Airborne Radionuclide Monitoring Requirements at PNNL-2001." A review of this document indicates the unabated emissions for 325 were 1.28E+03 mrem/year.</p>
<p>This process is limited to: operation of the Hazardous Waste Treatment Unit (HWTU). The HWTU consists of Rooms 520, 524 and 528. The Shielded Analytical Laboratory (SAL) consists of Rooms 200, 201, and 203. The waste compactor is located in Room 43. In the HWTU/SAL, hazardous materials and radioactive mixed waste will be stored, dispensed, used, handled, packaged in drums, and treated using various small bench-scale treatment processes. Approved waste treatment processes used in the HWTU/SAL include pH adjustment, ion exchange, carbon absorption, venting of gas cylinders, using polymer beads or mineral absorbents; such as clays, chemical oxidation, chemical precipitation, chemical reduction, waste concentration by evaporation, neutralization, filtration, solvent extraction, catalytic destruction, and grout encapsulation (cementation). The other activities approved for this NOC are the following operations: Radiochemical Processing - Basic and applied research for the development of technologies that provide solutions for</p>	<p>Continuous</p>	<p>CDM: Personnel interview and records review</p> <p>Comment: Verified with the Radioactive Waste Operations Lead that the scope of work within the HWTU is limited to these areas of the facility, as detailed in the NOC and the RCRA Part B permit. Rooms 202 and 32, are included in the RCRA Part B permit, but are not used for treatment, storage, or handling of radioactive mixed waste. An Administrative Amendment was submitted on August 27, 2002 to add room 524, and reissue AIR 98-909 as AIR 02-809.</p>

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<p>environmental and industrial problems. Research emphasis is the characterization of radiochemical and spent-fuel samples using analytical and metallurgical capabilities, and determining fluid and thermal behavior of waste processes and engineering systems. Analytical Chemistry - Provides quantitative gas analyses, isotopic analyses of elements, volume calibrations, and special gas standard mixtures. Typical operations include analytical weighing, sample dissolution, sample dilution, and aliquoting, digestion, distillation, titrimetric analysis, solvent extraction, and ion exchange separations. Environmental Management Services - Provides evaluation and implementation of compliant methods for waste treatment, storage and disposal. Technical staff are allowed to conduct research and development of various treatment processes and implementing the processes in waste management operations.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides Am 241 5.20E-01 Am 242 m 1.42E-03 Am 243 6.70E-04 Ba 137 m 4.90E+01 Ba 140 6.00E+02 C 14 1.00E-04 Ce 144 1.00E+02 Cm 242 2.00E-03 Cm 243 9.70E-04 Cm 244 1.03E+00 Co 60 2.80E+02 Cs 134 4.20E+01 Cs 137 6.50E+02 Eu 152 9.70E-04 Eu 154 2.00E+02 Eu 155 9.40E+02 Fe 55 5.40E+03 H 3 1.00E+02 I 129 4.10E-06 Kr 85 1.00E+02 La 140 1.60E+01 Mn 54 8.80E+02 Nb 95 9.60E+02 Np 237 7.00E-01 Pm 147 1.00E+03 Pr 144 1.60E+01 Pu 238 6.20E-01 Pu 239 5.20E-01 Pu 241 3.54E+00 Ra 226 1.20E+01 Ru 106 1.00E+02 Sb 125 1.20E+03 Se 79 2.84E-05 Sm 151 1.80E-02 Sr 90 1.60E+02 Ta 182 1.25E+00 Tc 99 5.86E-03 Te 125 m 4.92E-03 Th 228 1.00E+00 Th 232 1.00E-01 U 233 2.00E-01 U 235 4.20E+00 U 238 4.20E+00 Zn 65 2.40E+02 Zr 95 7.00E+02</p>	<p>Intermittent</p>	<p>CDM: Records Review</p> <p>Comment: Reviewed the 2002 NESHAPS Radionuclide Inventory. The following radionuclides exceed the APQ listed in the NOC approval condition: Am-241, Am-243, Cm-244, Cm-242, Cm-243, C-14, Eu-152, H-3, I-129, Np-237, Pu-328, Pu-239, Pu-241, Sr-90, Se-79, Sm-151, Tc-99, Te-125m, Th-232, U-233, U-238.</p>

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<p>These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040(5)) and (WAC 246-247-060(5)).</p>	Continuous	<p>CDM: Records Review</p> <p>Comment: Compliance to this condition is demonstrated through the implementation of PNNL's Laboratory Policies and Standards (http://sbms.pnl.gov/common/c100d010.htm) and the documents referenced in the Annual Air Operating Permit Compliance self assessment maintained in the Effluent Management Project Record file.</p>
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	Continuous	<p>CDM: Operational Procedure.</p> <p>Comment: Retention period is specified in the Effluent Management Quality Assurance Plan (EM-QA-01) and also identified in the EM Records Inventory and Disposal Schedule (RIDS).</p>
<p>The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).</p>	Continuous	<p>CDM: Records Review</p> <p>Comment: Records requested for review during Level II inspection on May 23, 2002 were provided within the requested timeframe. Inspection closed with no findings on June 13, 2002.</p>
<p>All waste resulting from activities in the 325 Building HWTU/SAL operations must be disposed of in accordance with prescribed PNNL Procedures.</p>	Continuous	<p>CDM: Personnel interview and records review</p> <p>Comment: All wastes are handled in accordance with operating procedures. Operational procedures specific to HWTU are labeled HWTU-XXX and general packaging/shipping/etc. applicable to all rad waste operations RWO-XXX. These are maintained on the Waste Operations web page. Verified with the Rad Waste Operations that these procedures are followed in operations at HWTU.</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).</p>	Continuous	<p>CDM: Records Review</p> <p>Comment: PNNL's Rad Air monitoring program is conducted under the Effluent Management Quality Assurance Plan, EM-QA-01. This plan is based on the requirements of 40 CFR 61, Appendix B, Method 114.</p>
<p>The facility shall ensure all emissions units are fully accessible to department</p>	Continuous	<p>CDM: Records Review</p>

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<p>inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>		<p>Comment: Implementation of the “Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspection”, dated July 2001. The MOU defines, at a site-wide level, the roles and responsibilities for regulator access to the Hanford Site.SBMS subject area “External Regulatory Inspections (ES&H)” further defines the roles and responsibilities at a contractor level for hosting, conducting, and documenting external regulatory inspections.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The waste compactor must remain HEPA filtered and exhausted through the main stack. It is only to be used for low-level dry materials, such as gloves, wipes, and step off pad waste as described in the NOC. Take wipes of the small compactor drawer after each compactor cycle. A log of these wipes must be maintained and available for an inspectors review.</p>	<p>Intermittent</p>	<p>CDM: Personnel interview and records review</p> <p>Comment: RWO-012, Rev. 3 – LLW Compactor Operation is the procedure used during waste compaction. This procedure specifies the collection of radiological smear samples at various stages of the compaction process. Currently this procedure doesn’t require smear samples to be documented. A procedure revision is planned to require results be documented on radiological survey reports which will be interpreted as the “log” and will be maintained at the facility.The exhaust from the compactor is routed through HEPA filtration (H-3-70230, Rev. 4, Sheet 3 of 9). Room 43.</p>
<p>The department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
related to compliance with the requirements of this chapter (WAC 246-247-080(1)).		convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Equipment and procedures for continuous monitoring shall conform to ANSI N13.1. The specific design must be approved by the department prior to installation. Any deviation from ANSI N13.1 must be approved by the department prior to construction (WAC 246-247-075(2)).	Continuous	<p>CDM: Records Review</p> <p>Comment: Sampling system information is maintained on the Effluent Management's web page under: 300 Area Facility Radionuclide Emission Points and Sampling Systems. This demonstrates how the sampling system meets the ANSI N13.1 requirements. EM-QA-01, Effluent Management Quality Assurance Plan, outlines the processes utilized in performing radiological stack sampling at PNNL. This document is based on the requirements of 40 CFR 61, Method 114 and specifies requirements for performing work in accordance with procedures based on ANSI N13.1. These requirements are transmitted to the RCT organization via a statement of work to identify requirements for sampling activities. The sampling system was installed and operational before issuance of this condition; therefore the design was not approved by the WDOH before installation.</p>
The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).	Not Applicable	<p>CDM: Records Review</p> <p>Comment: No reports were required.</p>
The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).	Continuous	<p>CDM: Records Review</p> <p>Comment: Abated emissions are included in DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that emissions data previously submitted by PNNL was included in the report.</p>
The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: Records Review</p> <p>Comment: Retention period for Rad Air records is</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		<p>specified as part of the Effluent Management Quality Assurance Plan, EM-QA-01. Retention periods are further documented in the EM project files under the Records Inventory and Disposal Schedule (RIDS).</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).</p>	<p>Continuous</p>	<p>CDM: Records Review</p> <p>Comment: Data collected through support organizations are coordinated through statements of work (SOWs) that outline project expectations for collection and reporting of data: Airborne Radionuclide Emission Sample Analysis Statement of Work (Sample analysis) Airborne Radionuclide Emission Sampler and Monitor Operations Statement of Work (Collection of samples, daily inspections, and delivery to laboratory) Effluent Sampling and Monitoring Support-Memorandum of Agreement (performance of stack flow measurements and maintenance of equipment) Memorandum of Agreement for Calibration Services (Calibration of rotameters and vacuum gauges) Note: All of these documents are maintained on the EM web page.</p>
<p>The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: Records Review / Personnel Interview</p> <p>Comment: Use and Maintenance: § RCTs are responsible for the collection of samples and operating monitoring equipment. These personnel are trained to procedures (located on the Effluent Management webpage) for these activities. Evidence of training to these procedures is maintained with the Laboratory Training group. § Air Balance personnel are responsible for the efficiency testing and replacement of HEPA filters. This testing is performed in accordance with Air Balance procedures located on the F&O webpage. Evidence of training to these procedures is maintained with the Laboratory Training group. Emergency Response: The Emergency Preparedness group trains the building emergency directors (BEDs) via PNNL courses 402, 403, and 404. Under each BED is a response organization (BERO), these personnel are trained under course 405. Training records are maintained with Laboratory Training. Emergency preparedness exercises are conducted on a scheduled basis to evaluate performance. Evaluations are maintained with the EP group.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting, requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6)).</p>		
<p>If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060-(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: No planned pre-operational testing occurred during reporting period.</p>

Emission Unit : (300) EP-327-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 407

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
<p>Zone or Area: Remaining areas of Building 327</p>	<p>Continuous</p>	<p>CDM: System drawings and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications."</p>

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Abatement Technology: Fan Required Units: 1 Add'l Description: 2 in parallel (machine shop is power ventilated with a single fan to the main flowpath of the remaining areas of building 327.)		Inquiry with Cognizant Engineer. Comment:
Zone or Area: Remaining areas of Building 327 Abatement Technology: HEPA Required Units: 1 Add'l Description: Single stage	Continuous	CDM: System drawings, review of facility surveillance records/logs, and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
Zone or Area: Rm. 15 Hood and Cells Abatement Technology: Fan Required Units: 1 Add'l Description: 2 in parallel, one standby. Serves Rm. 15 and Cells	Continuous	CDM: System drawings and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
Zone or Area: Rm. 15 Hood and Cells Abatement Technology: Prefilter Required Units: 1 Add'l Description: Cells only	Continuous	CDM: System drawings and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
Zone or Area: Rm. 15 Hood and Cells Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: System drawings, review of facility surveillance records/logs, and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Continuous Sampling Frequency: Continuous Radionuclide Requiring Measurement: All radionuclides which could contribute 10% of the potential EDE.	Continuous	CDM: System drawings, review of facility surveillance records/logs, and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment: "Continuous compliance" means collection of all monitoring data required by the Permit under the data collection frequency specified in the Permit, with no deviations, and no other information that indicates deviations, except for planned shutdowns, upsets, or malfunctions during which compliance is not required.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)	Continuous	CDM: Stack sampling procedure satisfies the facility-specific portion of this monitoring requirement. The

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
WAC 246-247-75(2) Permit Monitoring and Testing Procedure: Method 2 appendix A Method 114 appendix B 61.93(b)(2)(ii) ANSI N13.1		"NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the quality assurance requirements. 61.93(b)(2)(ii) ANSI N13.1: In compliance as stated in the most recent FFCA quarterly report. Comment:

(No NOC records were found.)

Emission Unit : (300) EP-331-01-V Life Sciences Laboratory I

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 412

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Room 302 Abatement Technology: Fan Required Units: 2 Add'l Description: in parallel (fan common to glove box & hoods)	Continuous	CDM: Records review / personnel interview. Comment: Drawing H-3-70213, Sheet 6 of 8, indicates fans HVE-4-F and HVE-5-F, in parallel, vent exhaust from room 302 as well as all other double filtered exhaust in the 331 building. Verified radiological exhaust system with the Building Engineer.
Zone or Area: Rooms 101-107 fume hood/chambers(area 4) Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Records review / personnel interview. Comment: Rooms renumbered #152 (Drawing H-3-70213, Sheet 8 of 8). Exhaust from fume hoods pass through a single stage HEPA filter. Verified radiological exhaust system with the Building Engineer.
Zone or Area: Rooms 101-107 glove boxes Abatement Technology: HEPA Required Units: 2 Add'l Description: in series	Continuous	CDM: Records review / personnel interview. Comment: Rooms renumbered #152. (Drawing H-3-70213, Sheet 8 of 8) Exhaust from glove boxes pass through double stage HEPA filters. Verified radiological exhaust system with the Building Engineer.
Zone or Area: 3rd floor fume hood Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Records review / personnel interview. Comment: Drawing H-3-70213, Sheet 5 of 8, "Exhaust Flow Diagram Single-Filtered Exhaust System." Verified radiological exhaust system with the Building Engineer.
Zone or Area: Inhalation suite (glove boxes& fume hoods) Abatement Technology: HEPA Required Units: 2 Add'l Description: Before 5/21/02: in series	Intermittent	CDM: Records review / personnel interview. Comment: Inhalation suite is in room 170 on the first floor. Drawing H-3-70213, Sheet 6 of 8. All hoods shown with two stages of HEPA filtration with the exception of Hood # 5. NOC / AOP Administrative Admendment approved May 21,

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
		2002 that changed the abatement conditions for hood #5 from double to single stage HEPA filtration.
Zone or Area: Room 302 Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Records review / personnel interview. Comment: Drawing H-3-70213, Sheet 6 of 8, indicates exhaust from room 302 passes through a single stage HEPA filter. Verified radiological exhaust system with the Building Engineer.
Zone or Area: Third Floor Change Rm Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Records review / personnel interview. Comment: The old change room is now part of Rooms 313 and 315, which share a single stage HEPA filter. (Drawing H-3-70213, Sheet 5 of 8) Verified radiological exhaust system with the Bulding Engineer.
Zone or Area: Inhalation suite (glove boxes& fume hoods) Abatement Technology: HEPA Required Units: 1 Add'l Description: 5/21/02 and after	Continuous	CDM: Records review / personnel interview. Comment: Verified configuration of radiological exhaust system with the Building Engineer. (Inhalation suite is now room 170.) Drawing H-3-70213, Sheet 6 of 8, indicates all hoods, with the exception of Hood #5, exhaust to two stages of HEPA filtration. Intermittent compliance reported since an AOP Administrative Amendment submitted to change the abatement conditions for Hood #5 double stage to single stage HEPA filtration was not approved until May 21, 2002.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Continuous Sampling Frequency: Continuous Radionuclide Requiring Measurement: All radionuclides which could contribute 10% of the potential EDE.	Intermittent	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed all required samples were collected during the reporting period, including the start and end dates of sample periods. Radionuclides contributing greater than 10% of the EDE are evaluated during the annual NESHAPS inventory assessment. These isotopes are analyzed isotopically on semi-annual composites. Semi-annual composite data were included as part of the emission data review. Np-237 emissions were estimated based on the total alpha minus the Pu-238 and Am-241 values for 2002.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4) WAC 246-247-075(2) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

NOC: HEPA Filter Bank Removal **Permit:** RTAM **Date:** 03-12-1996 **NOC ID:** 143
Date In AOP: 07-02-2001

No WDOH Conditions for this NOC.

NOC: Life Sciences Laboratory I Modifications **Permit:** AIR 98-108 **Date:** 01-21-1998 **NOC ID:** 254
Date In AOP: 07-02-2001 **Date Obsolete:** 02-14-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Emission unit EP 331-01-V must use an isokinetic sampling probe with design specifications meeting ANSI N 13.1.	Continuous	CDM: Records review. Comment: Sampling system information is maintained on the EM web page under: "300 Area Facility Radionuclide Emission Points and Sampling Systems." This demonstrates how the sampling system meets ANSI N13.1 requirements.
Stack emissions will be sampled for particulate matter containing alpha and beta activity using methods prescribed within Environmental Protection Agency Methods A-4 and B-4, and analyzed for gross alpha and gross beta activity, and specific radionuclides, as required.	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed all required samples were collected during the reporting period, including the start and end dates of sample periods. Radionuclides contributing greater than 10% of the EDE are evaluated during the annual NESHAPS inventory assessment. These isotopes are analyzed isotopically on semi-annual composites. Semi-annual composite data were included as part of the emission data review. The SOW with the analytical laboratory identifies the required methods for gross alpha/beta and specific radionuclides.

NOC: Life Sciences Laboratory **Permit:** AIR 02-207 **Date:** 02-14-2002 **NOC ID:** 254
Date In AOP: 06-11-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Review of compliance status for each approval condition listed for this approval order. Comment: For this approval order, in compliance with all applicable conditions.
The total abated emission limit for this Notice of Construction is limited to 8.07E-02 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 7.13E+00 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).	Continuous	CDM: Records review Comment: The "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002", DOE/RL-2003-19, was reviewed to verify the abated emissions from the 331 Building were below the NOC limits. NESHAPS inventory of radioactive materials is conducted for PNNL facilities on an annual basis in accordance with PNL-10855, "Assessment of Unabated Facility Emission Potentials for Evaluating Arborne Radionuclide Monitoring Requirements at PNNL-2001."

WDOH Conditions	Comp. Status	Compliance Determination Method
		The 2002 Assessment was reviewed to verify that emission were below the NOC limits.
<p>This process is limited to: research activities conducted in the 331 Building support the Hanford environmental mission and other key DOE missions of national and international importance. Research activities are performed on both radioactive and non-radioactive samples. Laboratory processes are conducted continuously (i.e., year-round, during normal business hours). The following processes are allowed in the 331 Building: Study of the health effects of chemical and radiation exposure on animals and in cells grown in culture. Examining the uptake and transformation effects of radionuclides in soils, plants, animals and microorganisms. Molecular level studies using radioactive tracer materials in biological and non-biologic systems. Subsurface microbiology including the physiology and ecology of subsurface microorganisms, degradation of organic contaminants and bioremediation, enzymatic reduction of metals, and biogeochemical cycling of nutrients. Investigation of macromolecular structure and dynamics: modeling of radiation (or chemically) damaged DNA; study the effects of tumor formation and biological systems; study of materials that concentrate or detoxify pollutants from the environment. Development of instrumentation and analytical methods. Characterizing and monitoring aquatic and terrestrial ecosystems through the development and deployment of new technologies and methods. Researching impacts of water use practices on fisheries and wildlife and the response of aquatic ecosystems to engineered structures and to natural and man-induced stresses. Research to promote the understanding of the chemical and biological processes that govern the mobility and degradation of a range of inorganic, radionuclide and organic contaminants in soils,</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Under the PNNL Standards Based Management System (SBMS) each new research project is required to be reviewed via the Electronic Proposal & Risk assessment process. The reviews are recorded in the EPR database. Facility changes are required to be reviewed via the SBMS Subject Area for "Engineering Calculations, Drawings and Specifications Creating and Modifying." Projects with potential air emissions are reviewed by Effluent Management under the SBMS Airborne Emission Subject Area.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>sediments, and ground water systems. Measurements of exposures to physical, radiological, and chemical agents. Developing technology for the separation, purification, production, and delivery of medically useful isotopes.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Am 241 4.51E-01 Am 243 1.86E-01 Ba 133 1.00E-02 C- 14 7.74E-01 Ca 45 2.00E-01 Cd 109 2.00E-01 Cm 248 4.20E-05 Co 57 2.00E-01 Co 60 2.00E-01 Cr 51 2.00E-01 Cs 137 2.25E-01 Eu 152 1.20E-01 Fe 55 2.00E-01 Fe 59 2.00E-01 H- 3 1.26E+01 I- 125 1.00E+00 I- 131 5.01E-01 Mn 54 2.00E-01 Ni 63 2.00E-01 Np 237 3.67E-01 P- 32 1.00E+01 P- 33 2.00E-01 Pu 238 1.71E+00 Pu 239 6.29E-01 Pu 240 1.03E-01 Pu 241 1.69E+00 Pu 242 4.59E-02 S- 35 1.52E+02 Sr85 1.20E-01 Sr 90 1.00E+02 Tc 99 9.27E+02 Tc 99 m 2.00E+01 Th 232 9.81E-01 U- 235 1.87E-01 U- 238 1.15E+00 Y- 90 3.50E+01 Zn 65 2.00E-01</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Reviewed the 2002 NESHAPs Radionuclide Inventory. All radionuclides in inventory were within the APQ listed in the NOC. Na-22, however was listed as a sealed source assigned to Rad. Controls (sealed sources have a PTE of zero mrem/yr).</p>
<p>Emission unit EP 331-01-V must use an isokinetic sampling probe with design specifications meeting ANSI N 13.1.</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Sampling system information is maintained on the Effluent Management's web page under: "300 Area Facility Radionuclide Emission Points and Sampling Systems." This demonstrates how the sampling system meets the ANSI N13.1 requirements.</p>
<p>Stack emissions will be sampled for particulate matter containing alpha and beta activity using methods prescribed within Environmental Protection Agency Methods A-4 and B-4, and analyzed for gross alpha and gross beta activity, and specific radionuclides, as required.</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Sampling system information is maintained on the Effluent Management's web page under: "300 Area Facility Radionuclide Emission Points and Sampling Systems." This demonstrates how the sampling system meets the ANSI N13.1 requirements. The SOW with the analytical laboratory identifies the required methods for gross alpha/beta and specific radionuclides.</p>
<p>These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040(5) and</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Compliance to this condition is demonstrated through the implementation of PNNL's Laboratory</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
246-247-060(5)).		Policies and Standards (http://sbms.pnl.gov/common/c100d010.htm) and the documents referenced in the Annual Air Operating Permit Compliance self assessment maintained in the Effluent Management Project Record file.
If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060-(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	CDM: N/A. Comment: No planned pre-operational testing occurred during reporting period.
The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).	Continuous	CDM: Records review. Comment: PNNL's Rad Air monitoring program is conducted under the Effluent Management Quality Assurance Plan, EM-QA-01. This plan is based on the requirements of 40 CFR 61, Appendix B, Method 114.
The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).	Not Applicable	CDM: Not applicable. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).	Continuous	CDM: Personnel interview / records review. Comment: Use and Maintenance: RCTs are responsible for the collection of samples and operating monitoring equipment. These personnel are trained to procedures (located on the Effluent Management web page) for these activities. Evidence of training to these procedures is maintained with the Laboratory Training group. Air Balance personnel are responsible for the efficiency testing and replacement of HEPA filters. This testing is performed in accordance with Air Balance procedures located on the F&O web page. Evidence of training to these procedures is maintained with the Laboratory Training group. Emergency Response: The Emergency Preparedness group trains the building emergency

WDOH Conditions	Comp. Status	Compliance Determination Method
		<p>directors (BEDs) via PNNL courses 402,403, and 404. Under each BED is a response organization (BERO), these personnel are trained under course 405. Training records are maintained with Laboratory Training. Emergency preparedness exercises are conducted on a scheduled basis to evaluate performance. Evaluations are maintained with the EP group.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).</p>	<p>Continuous</p>	<p>CDM: Records review</p> <p>Comment: Data collected through support organizations are coordinated through SOWs that outline project expectations for collection and reporting of data: Airborne Radionuclide Emission Sample Analysis Statement of Work (Sample analysis), Airborne Radionuclide Emission Sampler and Monitor Operations Statement of Work (Collection of samples, daily inspections, and delivery to laboratory), Effluent Sampling and Monitoring Support-Memorandum of Agreement (performance of stack flow measurements and maintenance of equipment), Memorandum of Agreement for Calibration Services (Calibration of rotameters and vacuum gauges) Note: All of these documents are maintained on the EM web page.</p>
<p>The Department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Retention period for Rad Air records is specified as part of the Effluent Management Quality Assurance Plan, EM-QA-01. Retention periods are further documented in the EM project files under the Records Inventory and Disposal Schedule (RIDS).</p>
<p>The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Abated emissions are included in</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that emissions data previously submitted by PNNL was included in the report.
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	<p>Not Applicable</p>	<p>CDM: Records review. Comment: No reports were required.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with WAC 246-247-080 (8).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(WAC 246-247-080 (6)).		
The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).	Continuous	<p>CDM: Operational procedure.</p> <p>Comment: Retention period is specified in the Effluent Management Quality Assurance Plan (EM-QA-01) and also identified in the EM Records Inventory and Disposal Schedule (RIDS).</p>
The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).	Continuous	<p>CDM: Records review.</p> <p>Comment: Implementation of the "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspection", dated July 2001. The MOU defines, at a site-wide level, the roles and responsibilities for regulator access to the Hanford Site. SBMS subect area "External Regulatory Inspections (ES&H)" further defines the roles and responsibilities at a contractor level for hosting, conducting, and documenting external regulatory inspections.</p>
The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).	Continuous	<p>CDM: Records review.</p> <p>Comment: Records requested for review during Level II inspection on April 14, 2002 were provided within the requested timeframe. Inspection closed with no findings on May 17, 2002.</p>
The emission unit monitoring system shall have the following activities performed: Within two years of this approval, and annually thereafter: a. A visual check of nozzle position and orientation as well as measurememnts of ;nozzle openings; b. Checks to ensure the tightness of all fittings and connections as well as a leak test of the	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
entire sampling system; and c. Visual inspections for corrosion, physical damage, or dust loading of the probe sample lines, and monitoring system equipment. Annually starting within one year of this approval: d. A functional/calibration check of monitoring system instrumentation shall be performed; and e. USDOE shall provide to WDOH for review copies of the procedures used to perform the above activities.		

Emission Unit : (300) P-340NTEX-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 423

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Moisture separator Required Units: 1 Add'l Description: Serves the vessel off-gas portion of the treatment system	Continuous	CDM: As-Built Drawings Comment: H-3-34404
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: In parallel, (only one fan operates at a time, one is a backup)	Continuous	CDM: As-built drawings Comment: H-3-34404
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series. 3 parallel flow paths, (Minimum of 2 active flow paths providing 1 stage prefiltration and 2 stages HEPA filtration)	Continuous	CDM: As-built drawings. Comment: H-3-34404
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 3 parallel flow paths, (Minimum of 2 active flow paths providing 1 stage prefiltration and 2 stages HEPA filtration)	Continuous	CDM: As-built drawings Comment: H-3-34404.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
<p>Required Sampling: Continuous Sampling Frequency: Continuous Radionuclide Requiring Measurement: All radionuclides which could contribute 10% of the potential EDE.</p>	Continuous	<p>CDM: Continuous sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements.</p> <p>Comment: "Continuous compliance" means collection of all monitoring data required by the Permit under the data collection frequency specified in the Permit, with no deviations, and no other information that indicates deviations, except for planned shutdowns, upsets, or malfunctions during which compliance is not required.</p>
<p>Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4) WAC 246-247-75(2) Permit Monitoring and Testing Procedure: Method 2 appendix A Method 114 appendix B 61.93(b)(2)(ii) ANSI N13.1</p>	Continuous	<p>CDM: Method 2 appendix A: Procedure 340-RC-004 Rev A/6 "Check K1 Exhauster Effluent Monitor." Method 114 Appendix B: The NESHAP Quality Assurance Plan for Radioactive Air Emissions (HNF-EP-0582, Rev. 4 specifies the quality assurance requirements.) 61.93(b)(2)(ii)ANSI N13.1 (1969): In compliance as stated in the most recent FFCA quarterly report.</p> <p>Comment:</p>

NOC: Tank Sludge Cleanout **Permit:** AIR 97-604 **Date:** 06-19-1997 **NOC ID:** 228
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Only one tank solids removal campaign shall be performed during any annual period which consists of the removal of all sludge in the subject tanks.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Did not remove tank solids during reporting period.</p>
The total abated offsite dose from the 340-A Building Tank Sludge Cleanout activities shall not exceed 3.05E-07 mrem/year.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Did not use this NOC during the reporting period.</p>
The ventilation system consists of 3 parallel flow paths. A minimum of two active flow paths is required Each path shall include a minimum of one prefilter, two HEPA filters in series, and two exhaust fans (one of which will be a backup fan)	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Did not use this NOC during the reporting period.</p>

Emission Unit : (300) EP-3720-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 419

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 stages of HEPAs, two in parallel	Continuous	CDM: Records review / personnel interview. Comment: Drawing Number H-3-70231 indicated the exhaust passes through two HEPA filters as described. The Building Engineer confirmed the radiological exhaust configuration.
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 1 operational, 1 backup	Continuous	CDM: Records review /Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust configuration.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Continuous Sampling Frequency: Continuous Radionuclide Requiring Measurement: All radionuclides which could contribute 10% of the potential EDE.	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed all required samples were collected during the reporting period, including the start and end dates of sample periods. Radionuclides contributing greater than 10% of the EDE are evaluated during the annual NESHAPS inventory assessment. These isotopes are analyzed isotopically on semi-annual composites. Semi-annual composite data were included as part of the emission data review. 'Continuous compliance' means collection of all monitoring data required by the Permit under the data collection frequency specified in the Permit, with no deviations, and no other information that indicates deviations, except for planned shutdowns, upsets, or malfunctions during which compliance is not required.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4) WAC 246-247-75(2) Permit Monitoring and Testing Procedure: Method 2 appendix A Method 114 appendix B 61.93(b)(2)(ii) ANSI N13.1	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (100K) R-1706KE-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 168

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Intermittent operation	Continuous	CDM: Walkdown of the system in May 2003. This included a review of the entries made in the log book kept by the switch by the fan that records when the fan is turned on. Comment: The fan is turned on when work is being performed within the hood in the laboratory.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Walkdown of the system in May 2003 in which a current DOP test sticker from Vent & Balance was observed on the side of the HEPA filter housing. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the quality assurance requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)		CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200) W-PORTEX 005

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 454

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(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Smear Survey Sampling Frequency: Annual	Continuous	CDM: The requirements for this smear survey are found in Process Standard 418. The Annual Surveillance is performed under procedure SP-29-29-001S. This was last performed in September 2002 and due in August 2003. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3)	Continuous	CDM: DOE/RL 2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002" verifies sampling was performed as required. Comment:

NOC: Construction and Operation **Permit:** AIR 98-503 **Date:** 05-20-1998 **NOC ID:** 272
Date In AOP: 07-02-2001 **Date Obsolete:** 07-24-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
All conditions and limitations must be proceduralized prior to the implementation of this NOC.	Not Applicable	CDM: N/A. Comment: The facility did not startup during the reporting period. In addition, none of the approval conditions were of a nature requiring implementation by a procedure.
Any deviation from the description of the modification of new construction, without approval of the department, may result in enforcement action under WAC 246-247-100.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department reserves the right at any time to require the licensee to provide for split or collocated sampling of this emission unit (WAC 246-247-075(10)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department reserves the right to conduct an environmental surveillance program around this emission unit and to require the facility to conduct or modify its	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that

WDOH Conditions	Comp. Status	Compliance Determination Method
own environmental monitoring program (WAC 246-247-075(9)).		pertain to actions to be completed in the future, or that pertain to actions required of the agency.
There are no preoperational tests planned for this unit, so the requirement for notification at least seven days prior to such testing under WAC 246-247-060(4) will not apply.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
This project must be included in the next revision of the Air Operating Permit, if active at that time (WAC 246-247-060(1)(e)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The NOC constitutes a contract between the department and the facility. Any changes must be approved by the department.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Any deviation from required or recommended monitoring standards must be approved by the department.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The emission limit for this emission unit is no detectable radioactivity as a result of any monitoring with standard portable instruments used, and survey methods followed, at Hanford (WAC 246-247-040(5)).	Continuous	<p>CDM: Procedure SP-29-001S is used to perform the annual smears. This was last performed in September 2002 and is due in August 2003.</p> <p>Comment:</p>

Emission Unit : (200W) W-PORTEX 028

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 492

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(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Work Activities Permit: AIR 99-1011 Date: 10-29-1999 NOC ID: 408 Date In AOP: 07-02-2001
Date Obsolete: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable compliance determination methods. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	CDM: CH2M HILL compliance matrix/work packages. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
This approval, with its conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in this NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emission control, monitoring, or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department retains the right to conduct its own stack sampling, environmental monitoring, or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be

WDOH Conditions	Comp. Status	Compliance Determination Method
provision for such testing (WAC 246-247-075(10) and (11)).		completed in the future, or that pertain to actions required of the agency.
<p>Periodic confirmatory emission monitoring shall be verified using the following two methods: (1) Non destructive analysis to be performed at the end of the calendar year, and log is to be maintained with a record of the exhauster's activities for the pit work. This log shall include information as to location, start and stop time and date, total of hours of operation with purpose specified. Additionally, the ductwork, seams and potential release locations on the portable exhauster shall be smeared at the end of each day to demonstrate that no contamination is escaping. The results of this shall be entered as part of the exhauster's record log. In the event that the exhauster is used on different emission units, the Department of Health reserves the right to request a nondestructive analysis/assay (NDA) after each exhauster job assignment (WAC 246-247-075(3)).</p>	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate that workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	Continuous	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation, including</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).		the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours.</p> <p>Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	Continuous	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
When this project is completed, via a report of closure, or operations cease, the facility shall notify the department, including whether or not any potential for airborne release occur (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Records must be readily (promptly)	Continuous	CDM: CH2M HILL records management.

WDOH Conditions	Comp. Status	Compliance Determination Method
available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).		Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance to have reasonable time to meet the requirements.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).	Continuous	CDM: CH2M HILL records management. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
The approved process is limited to that listed below as documented in the NOC. No other processes are approved. Department inspectors will verify this condition. Removal and/or installation of cover blocks: Inspections: Installation, disconnection, changing, leak testing, and cutting up jumpers/blanks or other pit equipment: Repairing/replacing valves, jumpers, pumps, leak detectors, or other instrumentation/equipment: Decontamination activities: Applying fixative with cover blocks on or off: Cleaning drains and checking the flow of drains: Unplug transfer lines:	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
The required control are as follows: Abatement Control Technology: 1. The portable exhauster providing active ventilation within the bullpen shall consist of a pre-filter, one HEPA filter, and a blower that draws air through the filters and pushes air out	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>an exhaust port. As Low As Reasonably Achievable Control Technology: 1. Radiation control technicians shall inspect and approve required containment. 2. Pit work shall shut down (or not initiated) when sustained wind speeds exceed 25 miles per hour or are predicted to do so by Hanford Meteorological Station personnel for the period of planned work. 3. The opening of the bullpen shall not exceed an area one-third the size of a fully opened roof. 4. Affected transfer lines shall be flushed with cover blocks in place. 5. Jumpers or other instrumentation/equipment removed from the pit shall be drained of free liquid and decontaminated or contained before removal. The outer-most surface shall not exceed 1,000 disintegrations per minute/100 square centimeters beta/gamma and 20 disintegrations per minute/100 square centimeters beta/gamma and 20 disintegrations per minute/100 square centimeters alpha before removal from the bullpen. 6. Only blocks necessary to perform intended work shall be removed. At the end of the work shift, the cover blocks shall be re-installed unless waste in the pit is contained in transfer lines or other pit equipment. 7. Active ventilation of the bullpen shall be used after removal of the cover blocks and during work activities to minimize radiological releases. Air inflow shall be achieved by using a 1,000 cubic feet per minute exhauster. 8. The inlet and outlet of the ventilation system will be sealed with plastic when the ventilation system is not in operation.</p>		
<p>The abated dose limit for this NOC shall not exceed 1.53E-02 mrem/yr to the MEI.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The total annual possession quantity is limited to 3.21E+03 curies.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		the period of January 1 - December 31, 2002.
To assure the intent of the ALARACT standard is sustained, and the adequacy of the design for the control technology equipment is maintained, continuous personnel coverage shall be employed while this equipment is in operation.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
This NOC is valid until July 14, 2004.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The radionuclides and annual possession quantities are limited to those stated in the following table.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

Emission Unit : (200E) W-PORTEX 032

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 497

Page in AOP: 2-78

(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Work Activities at Tank Farm 244-CR Vault **Permit:** AIR 00-206 **Date:** 02-15-2000 **NOC ID:** 424
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable Compliance Determination Methods. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Not Applicable	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)) and will at that time, constitute a revision of the Radioactive Air Emissions License.</p>	<p>Continuous</p>	<p>CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006.</p> <p>Comment:</p>
<p>If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction or during operation, it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>This NOC approval includes the following activities which might be performed in the diversion box of the 244-CR-Vault; remove or install cover blocks, perform inspections, install, disconnect, change, and cut up jumpers/blanks or other pit equipment, repair/replace valves, jumpers, pumps, filters, leak detectors, or other instrumentation/equipment. Perform decontamination activities, apply fixative with cover blocks on or off, clear drains and check flow of drains, unplug transfer lines. Miscellaneous activities that will not increase emissions above the sum of a conservative concentration of particulate radionuclides potentially airborne due to the splashing of drain back to the pit plus the radionuclides partitioned from the remaining 10 gallons of liquid and solid waste after 490 gallons drains to the vault. The partitioning fraction used for the splashing of drain back is 8.0 E-05. This value is to be used to account for the fact that the drain back height into the vault will occur from less than three meters. A</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
release fraction of 1.0E-03 was used for the 10 gallons of liquid remaining in the vault.		
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Periodic confirmatory samples consisting of contamination surveys during pit activities will be taken. Air samples will be taken at all times the bullpen is occupied and the exhauster is operating. Pre-job and post-job surveys will also be performed to verify containment. In the event that the exhauster is used on different emission units, the Department of Health reserves the right to request a nondestructive analysis / assay (NDA) after each exhauster job assignment (WAC 246-247-075(3)).	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).	Continuous	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080 (1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		required of the agency.
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H. (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site, scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours.</p> <p>Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	Continuous	<p>CDM: CH2M HILL notification procedures and deviation logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
When this project is completed, or operations cease, the facility shall notify the department and indicate whether or not any potential for airborne release occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080 (8)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must maintain a log in an approved format for this activity or emission unit (WAC 246-247-080(7)).</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1, - December 31, 2002.</p>
<p>The abated dose limit for this NOC shall not exceed 5.7E-2 mrem/yr. to the MEI.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The required controls are as described: Pre-job and post-job radiation surveys by radiation protection technicians, radiation work permits, pit work is shut down or not initiated if wind speeds exceed 25mph, fixatives could be applied inside the pit with cover blocks on or off or accessible portions of the pit decontaminated to less than 100,000 dpm beta/gamma and 2000 dpm for alpha, when cover blocks are removed a handrail for fall protection is installed. The handrail must be draped in plastic forming a contamination barrier; affected transfer lines could be flushed with cover blocks in place with water before removing jumpers. Radiation control</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1, - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>technicians monitor the affected work area while jumpers are being removed from nozzles. Additional controls will be used for any pit activity that has a potential for exposing additional waste to the pit environment which would otherwise remain contained in transfer lines or there pit equipment. Primary activities which would require these additional controls include jumper change outs, valve and nozzle replacements and cutting up contaminated equipment. The additional controls are: an open top bullpit designed to minimize the top opening, if the bullpen is to be left unattended at any time a temporary cover is placed over the pit or the cover blocks will be reinstalled. Active ventilation of the bullpen will be used after removal of the cover blocks during work activities to minimize radiological releases. Air inflow will be achieved by using a 1,000 cfm exhauster.</p>		
<p>The possession quantity is limited to 7.45E+3 curies.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1, - December 31, 2002.</p>
<p>This NOC is valid through fiscal year 2005.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

Emission Unit : (200W) P-276S141 001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 482

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
<p>Zone or Area: Abatement Technology: HEPA Required Units: Add'l Description: HEPA filtration</p>	<p>Continuous</p>	<p>CDM: Visual inspections of the system. Hexone Tank NOC (NOC ID 441) and the emission unit (ID 482) were cloased 24 May 2002. Comment: The tanks were grout filled in 2002.</p>

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Sampling Frequency: During characterization activities	Not Applicable	CDM: N/A. Comment: Characterization activities were completed before the reporting period. Hexone Tank NOC (NOC ID 441) and the emission unit (ID 482) were closed 24 May 2002.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3)	Continuous	CDM: NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware used to sample and the analytical methods used in the laboratory." Comment: Hexone Tank NOC (NOC ID 441) and the emission unit (ID 482) were closed 24 May 2002.

(No NOC records were found.)

Emission Unit : (200W) W-PORTEX 011

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 461

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(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Quarterly for 2 weeks of operations Sampling Frequency: Quarterly frequency revisited after a year for changes to annual.	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.

NOC: Modular Containment (PermaCon) for Sampling Activities at the Central Waste Complex **Permit:** RTAM
Date: 08-18-1998 **NOC ID:** 292 **Date In AOP:** 07-02-2001 **Date Obsolete:** 07-29-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Emissions shall be vented through a 2,000 cfm or less testable HEPA filter exhauster.	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
A fixed head sampler, located inside the PermaCon near the exhaust stack, shall be used at least	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.

WDOH Conditions	Comp. Status	Compliance Determination Method
quarterly for a minimum of two weeks of operations to obtain samples of the airspace within the PermaCon unit during operation.		

NOC: Central Waste Complex Operations Permit: AIR 02-710 Date: 07-29-2002 NOC ID: 295
Date In AOP: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
The total abated emission limit for this Notice of Construction is limited to 2.40E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 4.80E-02 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
This process is limited to: the process of managing four primary types of waste: low-level (LLW), low-level mixed (LLMW), transuranic (TRU), and TRU-mixed waste. The LLW typically contains rags, paper, rubber gloves, disposal supplies, tools, industrial waste (e.g., failed equipment), solidified process byproducts, and laboratory wastes that are contaminated with radioactive material. This waste is considered LLW if it contains radioactive material and is not classified as TRU waste, high-level waste, or spent nuclear fuel. Generally, LLW and LLMW accepted for storage at the CWC must meet the criteria for low specific activity through Type A2 quantities. Containers in excess of A2 quantities may also be accepted with a specific approved safety analysis. Although transuranic radionuclides may also be present in concentrations up to 100 nCi/g, this waste form is significantly less hazardous than TRU because the material is limited to Type A2 quantities. (Note: Contact handled TRU container limits are more than 1,000 times greater	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>than Type A2 quantities.) TRU and TRU-mixed waste typically contains rags, paper, rubber gloves, disposable supplies, tools, industrial waste (e.g., failed equipment), solidified process byproducts, and laboratory wastes that are contaminated with TRU material. This waste must contain at least 100 nCi of TRU material per gram of waste or it is considered LLW. The TRU waste accepted by CWC may contain varying concentrations of TRU radionuclides and limited amounts of non-TRU radionuclides. With some exceptions allowed based on safety analysis, the TRU content of waste containers is generally limited to 53 239/240 Pu dose equivalent curies (DE-Ci), where the DE-Ci is derived by multiplying the isotopic composition (i.e., weight fractions of the various TRU isotopes) by the specific activities of each isotope, and then converting that number with corrections factors taken from the Hanford Site Solid Waste Acceptance Criteria. The DE-Ci unit is designed to control inhalation dose impacts independent of radionuclide type. The radionuclides Pu-39 and Pu-240 are considered equivalent and are combined for calculation purposes. The annual possession quantity (APQ) shall be tracked by the DE curies and is represented by Pu-239 for this purpose. The CWC stores low-level (LLW), low-level mixed (LLMW), transuranic (TRU), and TRU-mixed waste. The CWC is designed for the receipt and storage of contact-handled waste packages, which are defined as packages having surface dose rate of less than 2 mSv/h (200 mrem/h). Although packages up to 200 mrem/h can be stored at CWC, an operation limit of 1 mSv/h (100 mrem/h) has been established. Each waste package is characterized before receipt and based on this information; incompatible forms of waste are physically segregated. CWC personnel receive and inspect waste packages at the Waste Receiving and Staging Area. Transport off-load operations are performed by hand truck, forklift, or</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>crane by qualified personnel. Packages are transported, generally by forklift to the mixed waste storage pad and then to the assigned facility. Alternatively, waste packages may be received, inspected, and unloaded at the specific facility where waste will be stored. Waste containers are not opened during normal operations at the CWC buildings. Under normal operating conditions there is no airborne release of radioactive material expected from opening waste containers. Inventories of TRU content, non-TRU radionuclides, and hazardous waste constituents are controlled at all waste storage facilities at the CWC. The inventory control system ensures that each building, building quadrant, or module will comply with its established inventory limit. TRU waste containers are generally equipped with a pressure relief vent device, such as the NucFil filter. This filter allows the release of any gases that may be produced as a result of radiolysis inside the container, while preventing release of any particulate matter. Waste shipments are transported to the Waste Receiving and Staging Area where the waste containers are radiologically surveyed and the exterior visually inspected for physical integrity. Waste records are checked for completeness and accuracy in accordance with procedures that provide instructions for performing detailed entry-by-entry reviews of waste records. To the extent practicable, this work is performed before unloading. However, partial unloading of a shipment may be necessary to complete a thorough survey and inspection. Verification of container contents, which may involve the opening of containers and sampling of waste contents, is performed at a facility separate from the CWC (e.g., T-Plant). Waste packages meeting all acceptance criteria are accepted for storage. Non-compliant waste packages (e.g., with paperwork errors or omissions and damaged containers) are held until the non-compliant condition is corrected to the satisfaction of the responsible Solid Waste Manager or designee. To detect</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>leaking or deteriorating containers, or deterioration of the containment system, all waste containers are inspected on a weekly basis. To ensure access for inspection, aisles are provided and rows may be no more than two drums wide. Nominal aisle width between container rows is 76.2 cm (30 in.) for all locations except the storage modules where 61 cm (24 in.) is the minimum. PermaCon unit: This approval also allows the placement of a modular containment PermaCon unit within the 2404WC Building (or similar CWC building) for the purpose of sampling the head space gas within solid waste storage containers.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Pu 239 4.69E+06</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>Emissions from the PermaCon shall be vented through a 2,000 cfm or less testable HEPA filter exhauster.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>A fixed head sampler, located inside the PermaCon near the exhaust stack, shall be used at least quarterly (for the period of operation or two weeks which ever is lower) to obtain samples of the airspace within the PermaCon unit during operation for each quarter that the PermaCon is operated.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040(5)) and (WAC 246-247-060(5)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(WAC 246-247-060(4)).		completed in the future, or that pertain to actions required of the agency.
The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).	Not Applicable	CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.
The department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).	Not Applicable	CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Not Applicable	CDM: N/A. Comment: Unit not operated during reporting period.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>
<p>The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Unit not operated during reporting period.</p>

Emission Unit : (200W) W-PORTEX-023

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 479

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Visual Verification. Comment:
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Intermittent operation	Continuous	CDM: Visual Verification. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Collect air samples on particulate air filters Sampling Frequency: One week per quarter during operation Radionuclide Requiring Measurement: GROSS ALPHA/BETA	Not Applicable	CDM: N/A. Comment: No entries were made into the 219-S vault area during the reporting period.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: N/A. Comment: No entries were made into the 219-S vault area during the reporting period.

NOC: Waste Handling Facility, Secondary Containment Upgrade, Rev 0A **Permit:** NRA **Date:** 01-20-1999
NOC ID: 336 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
The control equipment shall include an enclosure with an (intermittently operated) exhauster with HEPA filtration.	Not Applicable	CDM: N/A. Comment: No entries were made into the 219-S vault area during the reporting period.
Periodic confirmatory measurement shall include sample collection on particulate air filters for a period of one week per quarter. Sample collection shall be performed during exhauster operation and analyzed for gross alpha/beta activity.	Not Applicable	CDM: N/A. Comment: No entries were made into the 219-S vault area during the reporting period.

Emission Unit : (200W) W-PORTEX 026

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 490

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(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Double-Contained Receiver Tank Pit Work Permit: AIR 99-1002 Date: 10-06-1999 NOC ID: 403
Date In AOP: 07-02-2001 Date Obsolete: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable compliance determination methods. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction	Continuous	CDM: CH2M HILL compliance matrix/work packages. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)), and will at that time, constitute a revision of the Radiation Air Emissions License.	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction or during operation. The department reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical

WDOH Conditions	Comp. Status	Compliance Determination Method
decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).		summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
<p>Periodic confirmatory emission monitoring shall be verified using the following two methods. (1) Non destructive analysis to be performed at the end of the calendar year, and log is to be maintained with a record of the exhausters activities for the pit work. This log shall include information as to location, start and stop time and date, total of hours of operation with purpose specified. Additionally, the ductwork, seams and potential release locations on the portable exhauster shall be smeared at the end of each day to demonstrate that no contamination is escaping. The results of this shall be entered as part of the exhausters record log. In the event that the exhauster is used on different emission units, the Department of Health reserves the right to request a nondestructive analysis / assay (NDA) after each exhauster job assignment (WAC 246-247-075(3)).</p>	Not Applicable	<p>CDM: Field interviews</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	Continuous	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
regulations (WAC 246-247-080 (1)).		completed in the future, or that pertain to actions required of the agency.
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H. (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours.</p> <p>Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5)).</p>	Continuous	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
When this project is completed, or operations cease, the facility shall notify the department and indicate whether or not any potential for airborne release occur (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080 (8)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The abated dose limit for approved pit activities shall not exceed 0.0236 mrem/yr to the MEI.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The approved process for pit activities are limited to those listed below. No other processes are approved. Department inspectors will verify this condition. Removal and/or installation of cover blocks: Inspections: Installation, disconnection, changing, leak testing, and cutting up jumpers/banks or other pit equipment: Repairing/replacing valves, jumpers, pumps, leak detectors, or other instrumentation/Equipment: Decontamination activities: Applying fixative with cover blocks on or off: Clearing drains and checking the flow of drains: Unplug Transfer Lines:</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The required controls are as follows: Abatement control technology: The portable exhauster providing active ventilation within the bullpen shall consist of a pre-filter, one HEPA filter, and a blower that draws air through the filters and pushes air out an exhaust port. Alaract: Radiation control technicians shall inspect and approve required containment. Pit work shall be shut down (or not be initiated) when sustained wind speeds exceed 25 miles per hour or are predicted to do so by Hanford Meteorological Station personnel for the period of planned pit work. The opening of an open top bullpen shall not exceed an area one-third the size of a fully opened roof. Affected transfer lines shall be flushed with cover blocks in place. Jumpers or other instrumentation/equipment removed from the pit shall be drained of free liquid and decontaminated or contained before removal. The outer-most surface shall not exceed 1,000 disintegrations per minute/100 square centimeters beth/gamma and 20 disintegrations per minute/100 square centimeters alpha before removal from the bullpen. Only blocks necessary to perform intended work shall be removed. At the end of the work shift, the cover blocks shall be re-installed unless waste in the pit is contained in transfer lines or other pit equipment. Active ventilation of the bullpen shall be used after removal of the cover blocks and during work activities to minimize radiological releases. Air inflow shall be achieved by using a 1,000 cubic feet per minute exhauster. The inlet and outlet of the ventilation system will be sealed with plastic when the ventilation system is not in operation.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The radionuclides and annual possession quantities are limited to those stated in the following table: SUMMARY OF OVERALL EMISSIONS FOR 244-TX PIT WORK contained in the NOC</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>To assure the intent of the ALARACT standard is sustained, and the adequacy of the design for the control technology equipment is maintained, continuous</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
personnel coverage shall be employed while this equipment is in operation.		the period of January 1 - December 31, 2002.
This NOC is valid until July 14, 2004.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200W) W-PORTEX 029

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 493

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(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Tank Farm 241-S-151 Diversion Box Permit: AIR 99-1010 Date: 10-28-1999 NOC ID: 407
Date In AOP: 07-02-2001 Date Obsolete: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable compliance determination methods. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	CDM: CH2M HILL compliance matrix/work packages. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
This approval, with its conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in this NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emission control, monitoring, or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department retains the right to conduct its own stack sampling, environmental monitoring, or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Periodic confirmatory emission monitoring shall be verified using the following two methods: (1) Non destructive analysis to be performed at the end of the calendar year, and log is to be maintained with a record of the exhauster's activities for the pit work. This log shall include information as to location, start and stop time and date, total of hours of operation with purpose specified. Additionally, the ductwork, seams and potential release locations on the portable exhauster shall be smeared at the end of each day to demonstrate that no contamination is escaping. The results of this shall be entered as part of the exhauster's record log. In the event that the exhauster is used on different emission units, the Department of Health reserves the right to request an nondestructive analysis/assay (NDA) after each exhauster job assignment (WAC 246-247-075(3)).</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate that workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit</p>	<p>Continuous</p>	<p>CDM: CH2M HILL quality assurance program.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>(WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>		<p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>When this project is completed, via a report of closure, or operations cease, the facility shall notify the department, including whether or not any potential for airborne release occur (WAC 246-247-080(6)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance to have reasonable time to meet the requirements.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The approved process is limited to that listed below as documented in the NOC. No other processes are approved. Department inspectors will verify this condition. Removal and/or installation of cover blocks: Inspections: Installation, disconnection, changing, leak testing, and cutting up jumpers/blanks or other pit equipment: Repairing/replacing valves, jumpers, pumps, leak detectors, or other instrumentation/equipment: Decontamination activities: Applying fixative with cover blocks on or off: Cleaning drains and checking the flow of drains: Unplug transfer lines:</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The required control are as follows: Abatement Control Technology: 1. The portable exhauster providing active ventilation within the bullpen shall consist of a pre-filter, one HEPA filter, and a blower that draws air through the filters and pushes air out an exhaust port. As Low As Reasonably Achievable Control Technology: 1. Radiation control technicians shall inspect and approve required containment. 2. Pit work shall shut down (or not initiated) when sustained wind speeds exceed 25 miles per hour or are predicted to do so by Hanford Meteorological Station personnel for the period of planned work. 3. The opening of the bullpen shall not exceed an area one-third the size of a fully opened roof. 4. Affected transfer lines shall be flushed with cover blocks in place. 5. Jumpers or other instrumentation/equipment removed from the pit shall be drained of free liquid and decontaminated or contained before removal. The outer-most surface shall not exceed 1,000 disintegrations per minute/100 square centimeters beta/gamma and 20 disintegrations per minute/100 square centimeters beta/gamma and 20 disintegrations per minute/100 square centimeters alpha before removal from the bullpen. 6. Only blocks necessary to perform intended work shall be removed. At the end of the work shift, the cover blocks shall be re-installed unless waste in the pit is contained in transfer lines or other pit equipment. 7. Active ventilation of the bullpen shall be used after removal of the cover blocks and during work activities to minimize radiological releases. Air inflow shall be achieved by using a 1,000 cubic feet per minute exhauster. 8. The inlet and outlet of the ventilation system will be sealed with plastic when the ventilation system is not in operation.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The abated dose limit for this NOC shall not exceed 1.53E-02 mrem/yr to the MEI.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The total annual possession quantity is limited to 3.21E+03 curies.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
To assure the intent of the ALARACT standard is sustained, and the adequacy of the design for the control technology equipment is maintained, continuous personnel coverage shall be employed while this equipment is in operation.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
This NOC is valid until July 14, 2004.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The radionuclides and annual possession quantities are limited to those stated in the following table.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

Emission Unit : (200E) P-204AR-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 96

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E297. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296P031-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 210

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Parallel paths merge and pass through fan	Continuous	CDM: The fan is in place and operates continuously. Comment: Visual inspection and drawing H-2-96072.
Zone or Area: Abatement Technology: HEPA Required Units: 8 Add'l Description: 2 banks of 4 HEPAs each	Continuous	CDM: The HEPA filters are in place and are efficiency tested annually. Comment: Visual inspection and drawings H-2-95729 and H-2-96072, and efficiency test work package FA-02-001041P.
Zone or Area: Abatement Technology: Prefilter Required Units: 4 Add'l Description: 1 bank	Continuous	CDM: The pre-filter is in place. Comment: Visual inspection and drawings H-2-95729 and H-2-96072.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA	Continuous	CDM: Effluent stream is passed through a filter media. Filter is removed and analyzed. Comment: Analytical results are in ABCASH.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
TOTAL BETA		
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296AN-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 227

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths, 1 in operation at a time	Continuous	CDM: Field interviews. Comment: Exhauster shutdown on November 21, 2002, reported per CH2M HILL notification procedure, A-train started.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel flow paths with 2 HEPAs in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E901. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: Installation of a Small Mixer Pump to Support Routine pH Adjustment **Permit:** RTAM
Date: 06-08-1994 **NOC ID:** 38 **Date In AOP:** 07-02-2001 **Date Obsolete:** 10-15-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Installation of a small mixer pump to support routine pH adjustment. No impact on air emissions. Mixing with pump not considered routine.	Not Applicable	CDM: Refer to other conditions for applicable Compliance Determination Methods. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
Increased PTE makes it a modification, but not a significant one.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. The emission unit did not operate during the period of January 1-October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
All mixing must be in-tank.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1-October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
There shall be no measurable increase in air emissions downstream of the abatement system.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1-October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
The pump must be	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1-October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
The waste surface must remain quiescent during mixer pump action.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1-October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

NOC: Installation and Operation of Waste Retrieval System in Tanks 241-AN-101, 241-AN-102, 241-AN-103, 241-AN-104, 241-AN-105, and 241-AN-107 **Permit:** AIR 00-701 **Date:** 07-09-2000 **NOC ID:** 449
Date In AOP: 07-02-2001 **Date Obsolete:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
All conditions and limitations must be proceduralized prior to the implementation of this NOC.	Continuous	<p>CDM: Field interviews, CH2M HILL compliance matrix/work packages.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
This approval to commence construction is valid for only two years from the date of approval. If construction is not commenced within two years of approval, the approval is void.	Continuous	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
Any deviation from the description of the modification or new construction, without approval of the department, may result in enforcement action under WAC 246-247-100.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The emission data, including periodic confirmatory monitoring, must be reported in the Hanford Site Annual Air Emission Report.	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
No radionuclides other than those listed in the NOC may be emitted in any detectable concentrations (WAC 246-247-110(10)(11)(12)).	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The department reserves the right at any time to require the licensee to provide for split or co-located sampling of this project (WAC 246-247-075(10)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department reserves the right to conduct an environmental surveillance program around this emission unit and to require the facility to conduct or modify its own environmental monitoring program (WAC 246-247-075(9)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall notify the department at least seven days prior to any pre-operational testing (cold or hot) of the monitoring or containment system involved in this project. The department reserves the right to observe any such testing (WAC 246-247-060(4)). Notification may be by phone, electronic mail or written correspondence.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
This project must be included in the next revision of the Air Operating Permit if active at the time (WAC 246-247-060(1)(e)).	Continuous	<p>CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006.</p> <p>Comment:</p>
The NOC constitutes a contract between the department and the facility. Any changes must be approved by the department.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Any deviation from required or recommended monitoring standards must be approved by the department. The NOC makes a commitment on what standards (required or recommended) will be followed. At that point, the	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
commitment is binding.		completed in the future, or that pertain to actions required of the agency.
All records required by WAC 246-247 must be retrievable within 24 hours of the request, and must be stored onsite. All records shall be maintained for a minimum of five years (WAC 246-247-080(8)).	Continuous	<p>CDM: Field interviews, and CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
An ALARACT demonstration may be required at any time by the department (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Nothing may be inferred that is not specifically described in this NOC (WAC 246-247-060 and 110).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
When this project is completed, and ceases to be an emission unit, a report of closure must be filed with the department (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The project shall be fully accessible to department inspectors (WAC 246-247-080(9)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours.	Continuous	<p>CDM: Field interviews, CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Applicable standards included in WAC 246-247-040, unit specific emission limits, the offsite dose standard, ALARACT or BARCT, whichever is applicable, or any limitations included in this approval.</p>		
<p>The TEDE to the MEI from transfer pipe cuts will not exceed 3.34E-02 mrem/year. The annual possession quantity (APQ) shall not exceed 6.79E+02 curies. The annual dose to the MEI and APQ will be tracked on a WDOH approved log.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The unabated curies will not exceed the values for the radionuclides listed below: Unabated curies for pipe cuts: 3H, 2.72E-04; 14C, 3.81E-05; 59Ni, 2.21E-06; 60Co, 1.46E-04; 63Ni, 2.20E-04; 79Se, 4.22E-06; 90Sr, 1.07E-01; 90Y, 1.07E-01; 93mNb, 1.49E-05; 93Zr, 2.04E-05; 99Tc, 2.25E-04; 106Ru, 1.08E-08; 113mCd, 1.09E-04; 125Sb, 2.56E-04; 126Sn, 6.39E-06; 129I, 2.12E-06; 134Cs, 4.01E-05; 137Cs, 4.47E-01; 151Sm, 1.49E-02; 152Eu, 7.84E-06; 154Eu, 5.83E-04; 155Eu, 9.11E-04; 226Ra, 1.76E-07; 227Ac, 1.09E-09; 228Ra, 3.95E-04; 229Th, 9.13E-09; 231Pa, 4.80E-09; 232Th, 4.47E-08; 232U, 1.22E-06; 233U, 4.66E-06; 234U, 1.06E-06; 235U, 4.16E-08; 236U, 5.49E-08; 237Np, 5.97E-06; 238Pu, 2.43E-06; 238U, 1.26E-06; 239Pu, 1.75E-06; 240Pu, 3.56E-07; 241Am, 7.03E-04; 241Pu, 2.04E-04; 242Cm, 1.90E-07; 242Pu, 9.57E-10; 243Am, 3.62E-09; 243Cm, 9.34E-07; 244Cm, 2.97E-06. Unabated Curies for Pit Work/Equipment Installation and Removal: 3H, 2.31E-04; 14C, 3.24E-05; 59Ni, 1.88E-06; 60Co, 1.24E-04; 63Ni, 1.87E-04; 79Se, 3.59E-06; 90Sr, 9.08E-02; 90Y, 9.08E-02; 93mNb, 1.27E-05; 93Zr, 1.74E-05; 99Tc, 1.92E-04; 106Ru, 9.17E-09; 113mCd, 9.26E-05; 125Sb, 2.18E-04; 126Sn, 5.44E-06; 129I, 1.80E-06; 134Cs, 3.41E-05; 137Cs, 3.80E-01; 151Sm, 1.26E-02; 152Eu, 6.67E-06; 154Eu, 4.96E-04; 155Eu, 7.75E-04; 226Ra, 1.50E-07; 227Ac, 9.26E-10; 228Ra,</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>3.36E-04; 229Th, 7.77E-09; 231Pa, 4.08E-09; 232Th, 3.80E-08; 232U, 1.04E-06; 233U, 3.96E-06; 234U, 9.01E-07; 235U, 3.54E-08; 236U, 4.67E-08; 237Np, 5.08E-06; 238Pu, 2.06E-06; 238U, 1.07E-06; 239Pu, 1.49E-06; 240Pu, 3.03E-07; 241Am, 5.98E-04; 241Pu, 1.74E-04; 242Cm, 1.62E-07; 242Pu, 8.14E-10; 243Am, 3.08E-09; 243Cm, 7.95E-07; 244Cm, 2.52E-06. Unabated Curies for Soil Extraction (Guzzler): 90Sr, 1.01E-01; 90Y, 1.01E-01 and 241Am, 4.42 E-03. Unabated Curies for Soil Extraction (Hand Digging): 90Sr, 2.55E-02; 90Y, 2.55E-02 and 241Am, 1.02 E-03.</p>		
<p>The TEDE to the MEI from soil excavation by hand digging will not exceed the calculated annual dose of 1.61E-02 mrem/year, and will be performed in accordance with ALARACT 5 TWRS ALARACT Demonstration for Soil Excavation (using hand tools). The APQ shall not exceed 2.65E+01 curies. The annual dose to the MEI and the APQ will be tacked on a WDOH approved log.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The TEDE to the MEI from soil excavation by the Guzzler will not exceed 6.96E-02 mrem/year, and will be performed in accordance with the regulated Guzzler approval identified in (98-EAP-037). The APQ shall not exceed 1.15E-01 curies. The annual dose to the MEI and the APQ will be tracked on a WDOH approved log. Periodic confirmatory monitoring for soil excavation will consist of soil contamination surveys.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The TEDE to the MEI from pit work including equipment installation and removal will not exceed the calculated annual dose of 2.85E-02 mrem/year. The pit work will be performed in accordance with TWRS ALARACT Demonstration for Pit Access (6) and TWRS ALARACT Demonstration for Pit Work (14). When contamination levels inside the pit exceed those identified in the ALARACT Demonstrations a notification shall be made to the WDOH,</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
identifying the additional controls to be added in accordance with the containment matrix guide from HNF-IP-0842. The APQ shall not exceed 5.77E+02 curies. The annual dose to the MEI and the APQ will be tracked on a WDOH approved log.		
When a Portable/Temporary Radioactive Air Emission Unit (DOE/RL-96-75), or a HEPA Filtered Vacuum (DOE/RL-97-50) are used all Conditions and Limitations associated with those NOCs must be followed, all required logs must be maintained and emissions reported in the annual air emission report.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
Total soil excavated during the project will not exceed 6,000 cubic yards, which includes approximately 3,600 cubic yards inside the tank farm.	Continuous	CDM: Field interviews. Comment: Construction manager confirmed that limits were not exceeded during calendar year 2001, and 2002. The emission unit did not operate during the period of January 1 - December 31, 2002.
Pipe cuts will be made with a sawzall/tri-tool or equivalent tool. If removable contamination levels are greater than 10,000 dpm/100 cm ² beta-gamma and 200 dpm/100 cm ² alpha, the cuts and welding preparation must be performed inside a glovebag.	Not Applicable	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
Work in glove bags will not be performed if sustained wind speeds are greater than 30 miles per hour. This criterion applies to sustained wind speed as determined by the Hanford Meteorological Station.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
Removal of in-tank equipment will be performed in accordance with ALARACT Demonstration 13, TWRS ALARACT Demonstration for Installation, Operation, and Removal of Tank Equipment, and ALARACT 12 TWRS ALARACT Demonstration for Packaging and Transportation of Equipment and Vehicles.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
To confirm low emissions during equipment removal and installation periodic confirmatory monitoring will be as outlined in ALARACT 13, in	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>addition, periodic confirmatory monitoring for the Flexible Receiver Bagging Process will consist of taking a smear survey of the cut bag. Documentation of the survey will be maintained in a WDOH approved log.</p>		
<p>Monitoring of diffuse and fugitive emissions from this activity will be accomplished through the use of Ambient Near Field Monitors N984, N972, N999 and N158.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The HEPA filter on the endcap of the Long Length Contaminated Equipment Disposal System shall be installed and maintained in accordance with manufactures recommendations.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>Periodic confirmatory monitoring for use of the regulated guzzler, portable/temporary radioactive air emissions unit or a HEPA filtered vacuum will be as required by the approved NOC for that equipment.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>Periodic confirmatory monitoring for the 296-A-29 stack will consist of collecting a two-week sample four times a year, and will be representative of operation of the waste retrieval system. In addition, to ensure the potential-to-emit from these proposed activities remains less than 0.1 mrem/year, a non-destructive analysis (NDA) of the 296-A-29 HEPA filters will be performed annually during waste retrieval system operation. A baseline NDA will be performed prior to operation of the waste retrieval system.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The annual abated emissions from the 296-A-29 to the MEI, from mixer pump operations shall be 2.06E-5 mrem/yr.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

Emission Unit : (200E) P-296A030-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 228

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 4 Add'l Description: 1 stack ventilates 2 mirror trains of abatement systems	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 1 in each train(one in operation at a time)	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 2 Add'l Description: 1 in each train	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Deentrainer Required Units: 2 Add'l Description: 1 in each train	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E903. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296P041-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 95

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Not Applicable	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for this emission unit on October 15, 2002. The emission point and all equipment have been removed from AN Tank Farm and are in storage at 2727-WA. This stack is designated incorrectly and should not be designated for 241-AN Tank Farm alone.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 in series	Not Applicable	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for this emission unit on October 15, 2002. The emission point and all equipment have been removed from AN Tank Farm and are in storage at 2727-WA. This stack is designated incorrectly and should not be designated for 241-AN Tank Farm alone.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Not Applicable	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for this emission unit on October 15, 2002. The emission point and all equipment have been removed from AN Tank Farm and are in storage at 2727-WA. This stack is designated incorrectly and should not be designated for 241-AN Tank Farm alone.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for this emission unit on October 15, 2002.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for this emission unit on October 15, 2002.

(No NOC records were found.)

Emission Unit : (200E) P-296AP-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 204

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths, 1 in operation at a time	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel flow paths with 2 HEPAs in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description: 2 parallel flow paths,	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E013. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: Installation and Operation of Waste Retrieval System in Tanks 241-AP-102 and 241-AP-104
Permit: AIR 00-106 Date: 01-24-2000 NOC ID: 421 Date In AOP: 07-02-2001
Date Obsolete: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Field interviews. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.
These conditions and limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	CDM: CH2M HILL operational procedures/work packages. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.
This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)), and will at that time, constitute a revision of the Radioactive Air Emissions License.	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 245-247-040 during construction (as described in this NOC, or during operation) it reserves the right to require modifications to	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions

WDOH Conditions	Comp. Status	Compliance Determination Method
bring it into compliance (WAC 246-247-060-(2)(d)).		required of the agency.
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use an maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).	Continuous	CDM: CH2M HILL training program. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.	Continuous	CDM: CH2M HILL quality assurance program. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, procedures, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), ALARACT (paragraph 4) or BARCT (paragraph 3), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>		
<p>The work approved is limited to the installation and operation of Waste Retrieval System Tanks 241-AP-102 and 241-AP-104. It includes removal of existing equipment, installation of new equipment and construction of an annex to the 241-AP-71 instrument building and construction of a new pump pit in the AP Tank Farm (241-AP-04D).</p>	<p>Continuous</p>	<p>CDM: Field Interviews.</p> <p>Comment: Annex construction was completed May, 2001. There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>Construction of a Caustic Supply Dilution System to be constructed outside of the AP tank farm fence as described in the NOC. The Caustic Supply Dilution System must be isolated to prevent any backflow or radioactive material of the caustic feed tank. This system will not handle radioactive waste outside the tank farm.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>The new equipment to be installed is to include: a 300-horse power motor, spray wash system on each riser, one decant/transfer pump and one closed circuit television system in each tank.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>Installation of double contained waste transfer piping and diluent piping to and from the process pits and installation of approximately 32 feet of eight-inch diameter annulus ventilation piping. These 1,400 linear feet of piping will be installed about five feet underground.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>Installation of jumpers inside existing AP02A, AP02D, and new AP04A, AP04D, and new pit covers in the AP tank farm pits.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The following equipment is approved to be removed for AP-102: mixer pump, transfer pump, and drop-leg jumper.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
The following equipment is approved to be removed for AP- 104: transfer pump, a slurry distributor, and relocation of a drip tube assembly to a different riser (AP04D).	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Approval is given to remove jumpers: the central pump pit cover blocks and pump pit cover blocks of these pits.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Removal of approximately 15 linear feet of existing two-inch waste line.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Removals of about 32 feet of existing eight inch diameter annulus ventilation piping.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Use of equipment and containers for removal, cleaning, decontamination, transport, storage and burial of in-tank components and soil are approved.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The use of the regulated Guzzler, Portable/Temporary Radioactive Air Emission Unit and HEPA filtered vacuum radioactive emissions units may be used as needed as prescribed by DOH in their NOC approval.	Continuous	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Performance of miscellaneous activities on support of construction and operation activities will not increase emissions above those estimated in this NOC.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Soil excavation is limited to approximately 1,000 cubic yards total of which 600 cubic yards inside the tank farm backfill must be made with original soil or addition of controlled density fill composed of sand, water, and a small amount of cement. Cuts to transfer line must be done in a glove bag.</p>	<p>Continuous</p>	<p>CDM: Field interviews. Comment: Excavation work was limited to the outside the tank farm areas and it was confirmed less than limits were excavated during calendar year 2001 and 2002 and documented in CHG records.</p>
<p>An expandable plug must be placed when the riser is opened in order to maintain constant vapor space and material from falling into the tank.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>Glove bags will be removed before all welds.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>If smeared surface shows removable contamination levels are equal to or greater than 10,000-dpm/100cm² beta gamma and 200 dpm/100cm² alpha it must be cut and prepared for welding inside of a glove bag. Expandable foam and fixatives may be used to fix contamination.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
<p>If the wind speeds exceed 30 miles per hour the work in the glove bags will stop. If sustained wind speed exceeds 25 miles per hour pit work must stop. Records of wind speeds reading must be kept and made available to DOH, if requested.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
All pit work must be performed in accordance with TWRS ALARACT Demonstrations 6 and 14 for Pit Access and, ALARACT Demonstrations for Pit Work.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Equipment removed from the tank is not to be decontaminated in the tank farm. If decontamination is needed it must be performed inside a decontamination tent.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall make requested documents available for timely review (WAC 246-247-080(10)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Flexible bagging process of equipment shall be performed as outlined in the NOC. All equipment shall be double bagged. Disposal Long Length Contained Equipment (LLCE) Disposal System waste packaging process is used after the equipment is bagged. A vent penetration is made at the top of the end cap to the container. The vent must be fitted with or piped to a high-efficiency particulate air filter (HEPA).	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Soil excavation emission controls during construction activities must be based on TWRS ALARACT Demonstration 5 for soil excavation (using hand tools), and must follow the radiological controls specified in that ALARACT.	Continuous	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
In tank emission controls for the installation and removal of equipment activities must be based on TWRS ALARACT Demonstration 13 for installation, Operation and Removal of Tank Equipment, and must follow the radiological controls specified in that ALARACT.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
All HEPAs must be individually tested annually (per ASME 510) to a minimum efficiency of 99.95% for the removal of particulate with a median diameter of 0.3 microns.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Sample collection flow rate shall be approximately 120+/-12 cubic feet per hour.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
Periodic confirmatory measurements for the AP Tank Farms existing 296-A-40 stack shall consist of a two-week sample collected four times a year.	Continuous	<p>CDM: Field interviews.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
TEDE to the Maximally Exposed Individual (MEI) unabated dose from all construction activities is 0.042 millirem per year. The abated offsite dose from mixer pump operation is 2.17 E-05 millirem per year.	Continuous	<p>CDM: Verified that the release information used to determine unabated emissions in the NOC application has not increased.</p> <p>Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.</p>
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All construction approved in this NOC must be completed by 2011.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(From 5/22/02) All HEPAs must be individually tested annually (per ASME 510) to a minimum efficiency of 99.95% for the removal of particulate using a DOP aerosol as defined in ASME N510 or approved equivalent.	Continuous	CDM: Field interview Comment: There was no work inside the fence lines of the tank farm and there was no use of the guzzler, HEPA Vacuum or PTRAEU emissions units for the period January 1 - December 31, 2002.

Emission Unit : (200E) P-296A041-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 205

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths, minimum of 1 in operation at a time; annulus exhauster	Continuous	CDM: Records review and deviations report. Comment: Exhauster was shutdown several time during calendar year 2002. Reported per the CH2M HILL notification procedure.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel flow paths with 2 HEPAs in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description: 2 parallel flow paths with 1 heater	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E015. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296AW-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 150

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths, 1 in operation at a time	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel flow paths with 2 HEPAs in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E270. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296A028-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 156

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Heater Required Units: 2 Add'l Description: 1 for each train	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 2 Add'l Description: 1 for each train	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 4 Add'l Description: In series (1 stack ventilates 2 mirror trains of abatement systems)	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 1 for each train	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E272. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296A018-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 217

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment: Heater is not functional.
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Annulus exhauster AY 101, intermittent operations.	Continuous	CDM: Field interviews and deviation report. Comment: The exhauster was shutdown on March 30, 2002, and reported through the CH2M HILL notification procedure.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E060. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: 241-AY-101 Annulus Primary Tank Wall Cleaning Activities **Permit:** AIR 01-1108 **Date:** 11-15-2001
NOC ID: 484 **Date In AOP:** 06-11-2002 **Date Obsolete:** 10-15-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Not Applicable	CDM: Refer to other conditions for applicable Compliance Determination Methods. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
The total abated emission limit for this Notice of Construction is limited to 1.56E-09 mrem/year to the Maximally Exposed Individual. The total unabated emission limit for this Notice of Construction is limited to 3.12E-06 mrem/year to the Maximally Exposed Individual.	Not Applicable	CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
This process is limited to: the removal and collection of corrosion product debris from the exterior of the primary tank wall within the double-shell tank 241-AY-101 annulus area. The wall cleaning system will remove corrosion product and concrete splatter from initial tank construction that is affixed to the primary tank. The cleaning system will expose clean base metal as required to accommodate performance of visual inspection and nondestructive testing. The remote wall cleaning mechanism will consist of a high-pressure water spray. The water spray head will be mounted in shroud and the water and debris will be channeled into a collection vessel. The remote wall cleaning system will be inserted into the annulus through risers and will employ a crawler that is	Not Applicable	CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>attached to the tank wall by means of vacuum suction. The vacuum suction shall serve to collect the debris and wastewater generated during the wall cleaning operations. The debris, wastewater, and exhaust associated with the vacuum suction are channeled out of the annulus to a mobile tank via pumping. The debris and wastewater will be collected in the tank. The vacuum suction exhaust air will be directed back into the annulus, and will be exhausted by the 296-A-18 emission unit.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Alpha 0 7.00E-05 Beta 0 2.99E-02</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040(5) and 246-247-060(5)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>The department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting, requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6))</p>	<p>Continuous</p>	<p>CDM: Closure approval document dated October 15, 2002.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The current sampling probe must be qualified to show that it collects an adequate sample. The qualification documentation shall be provided to WDOH for review and approval.</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>Diffuse/Fugitive emissions shall be monitored using the 200 Area near-field ambient air monitors. Sample collection and analysis shall follow that of the near</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
field monitoring program. Analytical results shall be reported in the Annual Air Emissions Report. Any change to this near-field ambient monitoring program must be approved by the department.		was approved for the emission unit NOC on October 15, 2002.
Prior to initial operation a leak check will be performed on the ductwork leading from the vacuum suction exhaust back to the 241-AY-101 annulus. After the initial leak check a visual inspection shall be performed weekly to look for cracks and deformities in the ductwork. The results of the visual inspections shall be documented on a WDOH approved log.	Not Applicable	CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
The emission unit monitoring system shall have the following activities performed: Annually starting within one year of this approval: a. A functional/calibration check of monitoring system instrumentation shall be performed. b. Checks to ensure the tightness of all fittings and connections. c. Visual inspections for physical damage of the sampling system. d. USDOE shall provide to WDOH for review copies of the procedures used to perform the above activities.	Not Applicable	CDM: CH2M HILL records and field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.

Emission Unit : (200E) P-296A019-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 218

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment: Heater is not functional.
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Annulus exhauster	Continuous	CDM: Field interviews. Comment: Exhauster shutdown on May 31, 2002, reported per CH2M HILL notification procedure.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E061. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296A020-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 174

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: Non-operational Add'l Description: This unit is inactive and will require an NOC to resume operation or a report of closure to deregister.	Continuous	CDM: Field interviews. Comment: AIR 01-805, startup approved on August 22, 2001.
Zone or Area: Abatement Technology: HEPA Required Units: Non-operational Add'l Description: This unit is inactive and will require an NOC to resume operation or a report of closure to deregister.	Continuous	CDM: Draft-Mike Field interviews. Comment: AIR 01-805, startup approved on August 22, 2001.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E197. Comment: Record sampler shutdown on May 23, 2002, reported per the CH2M HILL notification procedure.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-296A043-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 216

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths; only 1 flow path normally operates at a time; either fan can be used with either filter train.	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description: 2 parallel flow paths; only 1 flow path normally operates at a time	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 2 parallel flow paths; only 1 flow path normally operates at a time	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E148. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200E) W-PORTEX 022

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 477

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(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: NDA after each job; or maintain operating logs once per year if not used on different jobs	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

NOC: 241-ER-152 Diversion Box and 244-A Lift Station Pit Work **Permit:** AIR 99-204 **Date:** 02-12-1999
NOC ID: 340 **Date In AOP:** 07-02-2001 **Date Obsolete:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Field interviews. Refer to other conditions for applicable Compliance Determination Methods. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
This approval, with its Conditions and Limitations, constitutes an amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:

WDOH Conditions	Comp. Status	Compliance Determination Method
(2)(c).		
<p>If the department finds that the emission unit described in this NOC, is not in compliance with the standards in WAC 245-247-040 during construction, as described in this NOC, or during operation, it reserves the right to require modifications to bring it into compliance (WAC 246-247-060-(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems (if conducted). The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Periodic confirmatory sampling is required. It must consist of non-destructive analysis (NDA) after each work package. An acceptable alternative is the maintenance of logs and NDA once a year, unless the exhauster is used on another emission unit during that year. In the event the exhauster is used on different emission units, an NDA will be required after each job (WAC 246-247-075(3)).</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use an maintenance of emission control and monitoring systems, and in the performance of associated test and</p>	<p>Continuous</p>	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
emergency response procedures (WAC 246-247-075(12)).		
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be	Continuous	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5).</p>		
<p>When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred (WAC 246-247-080(6)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must maintain a log in an approved format for this activity or emission unit if the latter monitoring method is used (WAC 246-247-080(7)).</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The facility shall make requested documents available in a timely manner for review. (WAC 246-247-080(10)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The approved process is limited to that described in the NOC and as clarified in the faxed response to department questions and comments dated February 10, 1999. No other processes are approved. Department inspectors will verify this condition.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The required controls are approved as clarified in the February 10, 1999 faxed response to department questions and comments. The pit must not be left unattended when the pit is open, without some cover (as described in the response to question 11 in the department's comments),	Not Applicable	<p>CDM: Field interviews</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
If flushing pressure is expected to exceed 50 psig, the department must be notified and assured that proper hoses, couplings and fittings are appropriate for the pressure used. Between 50 and 120 psig, only a notification is required. Anything above 120 psig requires approval from the department.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The annual possession quantity is limited to 3.92E+03 curies per pit.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The emission limits for each pit may not cause an offsite dose to exceed 2.45E-02 mrem/yr to the MEI.	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	<p>CDM: CH2M HILL compliance matrix.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All commitments made in the clarification fax of February 10, 1999 are required.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
This NOC is valid until January 1, 2005, when it expires (only for the activities described in this NOC and the clarification fax of February 10, 1999).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200E) P-242A-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 141

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths (Minimum 1 parallel path in operation)	Continuous	CDM: Review essential drawing and round sheets. Comment: Drawing H-2-69294, sheet 2; TO-620-020, "Operate the 242-A Evaporator Ventilation System"; OR-PWR-03, "ETF and 242-A Evaporator Stationary Operating Engineer Rounds."
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel flow paths with 2 HEPAs in series	Continuous	CDM: Review essential drawing. Comment: Drawing H-2-69294, sheet 2.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 2 parallel flow paths with 1 prefilter	Continuous	CDM: Review essential drawing. Comment: Drawing H-2-69294, sheet 2.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Review ABCASH data. Comment: Results documented in DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002"

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200E) P-242A-002

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 142

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Fan operates during 242-A processing.	Continuous	CDM: Review essential drawing, round sheets, and facility operating schedule. Comment: Drawing H-2-98998.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Review essential drawing. Comment: Drawing H-2-98998.
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Review essential drawing. Comment: Drawing H-2-98998.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample; Continuous monitoring during campaigns. Sampling Frequency: Non-campaign: 4 weeks per year Campaign: one sample in the quarter prior to each campaign; one during each campaign; one sample during the quarter following the campaign. Radionuclide Requiring Measurement: TOTAL ALPHA, TOTAL BETA, 137 Cs, 90 Sr, 239 Pu, 238 Pu, 241 Am	Continuous	CDM: Review ABCASH data and facility operating schedule. Comment: 2002 was a campaign year.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
<p>Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3)</p> <p>Permit Monitoring and Testing Procedure: During campaigns: Method 2 appendix A Method appendix B 61.93(b)(2)(ii) ANSI N13.1: During non-campaigns Appendix B, Method 114(3)</p>	Continuous	<p>CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory.</p> <p>61.93(b)(2)(ii) ANSI N13.1: In compliance as stated in the most recent FFCA quarterly report.</p> <p>Comment: 2002 was a campaign year.</p>

NOC: Stack 296-A-22 Downgrade **Permit:** AIR 98-704 **Date:** 07-09-1998 **NOC ID:** 284
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Periodic confirmatory monitoring requirements during years with no campaigns include: A total of four weeks of sampling data for each non-operating year. Analysis for total alpha, total beta, and Cs-137</p>	Continuous	<p>CDM: Review ABCASH data and facility operating schedule.</p> <p>Comment: 2002 was a campaign year.</p>
<p>Periodic confirmatory monitoring requirements during years with campaigns include: A minimum of one sample in a quarter prior to each campaign A minimum of one sample during the campaign runs A minimum of one sample during the quarter preceding the campaign runs The monitoring system must be NESHAPs compliant and operating in compliance with NESHAPs and WAC 246-247 designated stack requirements when it is operating. Sampling for total alpha, total beta, Cs-137, Sr-90, Pu-239(sic), Pu-238, I-129, Am-241 and any other specific radionuclides contributing to 10% of the potential-to-emit for each campaign.</p>	Continuous	<p>CDM: Review ABCASH data, process control plan, and facility operating schedule.</p> <p>Comment: 2002 was a campaign year.</p>
<p>The monitoring system must be NESHAPs compliant and operating in compliance with NESHAPs and WAC 246-247 designated stack requirements when it is operating.</p>	Continuous	<p>CDM: The Radcon sample exchange procedure satisfies the facility-specific portion of this monitoring requirement. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the quality assurance requirements. 61.93(b)(2)(ii) ANSI N13.1: In compliance as stated in the most recent FFCA quarterly report.</p> <p>Comment: 2002 was a campaign year.</p>

NOC: Stack 296-A-22 Downgrade **Permit:** AIR 98-808 **Date:** 08-24-1998 **NOC ID:** 296
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Sampling for total alpha, total beta, Cs-137, Sr-90, Pu-239, Pu-238, I-129, Am-241 and any other specific radionuclides contributing to 10% of the potential-to-emit for each campaign.	Continuous	CDM: Review of ABCASH data and facility operating schedule. Comment: 2002 was a campaign year.
Monitoring for I-129 needs to occur only when this isotope exceeds 10% of the PTE.	Continuous	CDM: Review process control plan and facility operating schedule. Comment: 2002 was a campaign year. I-129 did not exceed 10% of the PTE.

Emission Unit : (200E) P-244AR-002

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 211

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: Non-operational Add'l Description:	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.
Zone or Area: Abatement Technology: HEPA Required Units: Non-operational Add'l Description:	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.
Zone or Area: Abatement Technology: Prefilter Required Units: Non-operational Add'l Description:	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.
Zone or Area: Abatement Technology: Heater Required Units: Non-operational Add'l Description:	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Prefilter Required Units: Non-operational Add'l Description:	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.
Zone or Area: Abatement Technology: Required Units: Add'l Description: (This unit is inactive and will require an NOC to resume operation or a report of closure to deregister this emission unit).	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: This unit is passively ventilated. Radionuclide Requiring Measurement: This unit is nonoperational and will require an NOC to operate or report of closure to deregister	Not Applicable	CDM: ABCASH Program, EDP code number E052. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: CH2M HILL quality assurance program. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A Closure Report was approved for this emission unit on October 15, 2002.

(No NOC records were found.)

Emission Unit : (200E) P-2025E ETF

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 301

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Building Ventilation System Abatement Technology: Fan Required Units: 2 Add'l Description: Serves both areas	Continuous	CDM: Field interviews; Drawing H-2-89021. Comment:

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Building Ventilation System Abatement Technology: HEPA Required Units: 2 Add'l Description: 3 parallel flowpaths each with 1 filter and 1 fan; minimum 2 in operation.	Continuous	CDM: Field interviews; Drawing H-2-89021. Comment:
Zone or Area: Vessel Off-Gas System Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews; Drawing H-2-88993. Comment:
Zone or Area: Vessel Off-Gas System Abatement Technology: HEPA Required Units: 3 Add'l Description: 1 heater and 2 filters in series, with 2 parallel fans (minimum of 1 in operations). VOG discharges into Building Ventilation	Continuous	CDM: Field interviews; Drawing H-2-88993. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Monitoring stations N498, N499, N972, and N999 Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Review of ABCASH data. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: 200 Area Effluent Treatment Facility and Load-In Station Permit: RTAM Date: 01-14-1997
NOC ID: 211 Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
ETF abated emissions: 1.25 E-5 mrem/yr.	Continuous	CDM: Review facility inventory tracking records. Comment: WMP-331-3.09, "NOC Compliance for ETF, Load-In Facility, and LERF."

NOC: Increase in Potential to Emit, Rev 0A Permit: NRA Date: 01-19-1999 NOC ID: 331
Date In AOP: 07-02-2001 Date Obsolete: 07-10-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
WDOH Conditions and Limitations dated 1/14/97 (RTAM) are applicable. There are no new WDOH conditions that apply to this NOC.	Not Applicable	CDM: N/A. Comment: WDOH determined the licensee does not need to certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200E) P-242AL42-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 148

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Charcoal filter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing H-2-88766. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Environment Sampling; Monitoring stations N498, N499, N972, and N999 Sampling Frequency: Air- every 2 weeks continuous deposition annually Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Review of ABCASH data. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Increase in Potential to Emit, Rev 0 **Permit:** RTAM **Date:** 01-14-1997 **NOC ID:** 211
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
ETF Load in station and LERF = 2.50E-02 mrem/yr to the MEI.	Continuous	CDM: Review facility inventory records to confirm estimated emissions. Comment: WMP-331-3.09, "NOC Compliance for ETF, Load-In Facility, and LERF."

NOC: Increase in Potential to Emit, Rev 0 **Permit:** NRA **Date:** 01-19-1999 **NOC ID:** 331
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
WDOH Conditions and Limitations dated 1/14/97 (RTAM) are applicable. There are no new WDOH conditions that apply to this NOC.	Not Applicable	CDM: N/A. Comment: WDOH determined the licensee does not need to certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200E) P-242AL43-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 147

Page in AOP: 2-117

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Charcoal filter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing H-2-88766. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Environment Sampling; Monitoring stations N498, N499, N972, and N999 Sampling Frequency: Air- every 2 weeks continuous deposition annually Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Review of ABCASH data. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Increase in Potential to Emit, Rev 0 **Permit:** RTAM **Date:** 01-14-1997 **NOC ID:** 211
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
ETF Load in station and LERF = 2.50E-02 mrem/yr to the MEI.	Continuous	CDM: Review facility inventory records to confirm estimated emissions. Comment: WMP-331-3.09, "NOC Compliance for ETF, Load-In Facility, and LERF."

NOC: Increase in Potential to Emit, Rev 0 **Permit:** NRA **Date:** 01-19-1999 **NOC ID:** 331
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
WDOH Conditions and Limitations dated 1/14/97 (RTAM) are applicable. There are no new WDOH conditions that apply to this NOC.	Not Applicable	CDM: N/A. Comment: WDOH determined the licensee does not need to certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200E) P-242AL44-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 146

Page in AOP: 2-118

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Charcoal filter Required Units: 1 Add'l Description:	Continuous	CDM: Review as-built drawings H-2-88766. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Environment Sampling; Monitoring stations N498, N499, N972, and N999 Sampling Frequency: Air- every 2 weeks continuous deposition annually Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Review of ABCASH data. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Increase in Potential to Emit, Rev 0 **Permit:** RTAM **Date:** 01-14-1997 **NOC ID:** 211
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
ETF Load in station and LERF = 2.50E-02 mrem/yr to the MEI.	Continuous	CDM: Review facility inventory records to verify low emission estimates. Comment: WMP-331-3.09, "NOC Compliance for ETF, Load-In Facility, and LERF."

NOC: Increase in Potential to Emit, Rev 0 Permit: NRA Date: 01-19-1999 NOC ID: 331
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
WDOH Conditions and Limitations dated 1/14/97 (RTAM) are applicable. There are no new WDOH conditions that apply to this NOC.	Not Applicable	CDM: N/A. Comment: WDOH determined the licensee does not need to certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200E) P-296A010-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 384

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Inactive	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description: 1 blank	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample Sampling Frequency: 1 week sample / year (when operating) Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.

NOC: Reactivation of PUREX Storage Tunnel #2 **Permit:** AIR 99-1205 **Date:** 12-20-1999 **NOC ID:** 417
Date In AOP: 07-02-2001 **Date Obsolete:** 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction or during operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.

WDOH Conditions	Comp. Status	Compliance Determination Method
with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.		
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)). Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5) (WAC 246-247-080(5)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
This unit must be fully accessible to Department of Health inspectors.	Not Applicable	CDM: N/A.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Inspectors must be able to verify that the stack is operational or capped and sealed when the tunnel is shut down. Access must be given to the department for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>		<p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>Stack 296-A-10 HEPAs must be tested and determined to be operational prior to transfer of waste. This includes testing and nondestructive analysis/assay (NDA) of the testing of the high-efficiency particulate air (HEPA) filters on the tunnel exhauster as a baseline for determination of filter loading after the placement was completed.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>If the tunnel is opened for more than three months between transfers an NDA of the filters is required.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>The processes will consist of receiving up to 3.5 million curries of radioactive waste loaded into 22-ton steel waste disposal boxes (SWDBs). The SWDBs will be transferred by truck, transferred onto rail cars, and placed into the PUREX Tunnel.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>The steel waste disposal boxes (SWDBs) are engineered to minimize emissions during the loading, transportation, and transfer processes. Only waste received in SWDBs will be placed in the PUREX Tunnel. Dispersible waste must be contained in engineered containers placed (maximum of eight) in the rectangular grout container. Nondispersible waste (e.g., filters, ion exchange columns, cut-up metal tanks and racks, etc.) must be held directly inside the rectangular grout container. Alternate packaging for receipt/storage,</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>must provide equivalent or greater degree of airborne control, and be approved by WDOH before use.</p>		
<p>Each SWDB container must be equipped with a minimum of two NucFil® filters in series. If the container has dispersible material, it must have three NucFil® filters. A maximum of twelve rail cars containing waste may be added to the tunnel.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>All containers must meet transportation requirements to be moved by truck to the PUREX Tunnel rail cut. A mobile crane will be used to transfer the SWDB from the truck to the rail car. The impact liner and overpack must be free of loose contamination before it can be reused for subsequent transfers.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>The rail car may remain in the rail cut, with appropriate postings, or could be moved just inside the exterior door into the outer area of the PUREX Tunnel while waiting the next transfer. Only two SWDBs are allowed on a single rail car. The rail cars must not have any dispersible contamination on them. If they do, they must be stored inside the tunnel doors and cannot be held outside.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>The required average stack flow rate is 2.0 cubic meters per second. The stack must have a single stage of HEPA filters (3x3) with a particulate removal efficiency of at least 99.95 percent.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
<p>The stack will operate during waste placement. Depending on the length of time before the next transfer, the stack should be shutdown and capped between transfers, especially if the next transfer is not expected for a year or more. If the next transfer is expected within the same year, the stack can be operated between transfers. Testing of the HEPA filters will be performed annually. NDA would be required each year when a rail car is placed in the tunnel, or when the stack is uncapped and used for powered ventilation. During years in which no waste is placed in the PUREX Tunnel and the 296-A-10 stack is capped</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(weather tight), testing of the HEPAs and NDA analysis would not be required until the stack is reactivated for the next transfer.		
The sampling system will be upgraded to include the installation of test ports that will conform to 40 CFR 60, Appendix A	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
If the stack is opened for any three-month period between transfers an NDA analysis of the filters is required. Environmental air samplers N158, N985, N970, N957, N969, N977 and N978 may not be removed without DOH approval.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
Up to 3.5 million curies of radioactive waste can be placed into the remaining 12 rail car positions of the PUREX Tunnel over the next 10 years. Up to 1 percent (35 thousand curies) of the additional waste can be transuranic.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
The facility shall make requested documents available for timely review (WAC 246-247-080(10)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
Periodic confirmatory measurements to confirm low emissions from the 296-A-10 stack will be performed by NDA. NDA provides detection of cesium-137 loaded on HEPA filters. The loading of strontium-90, plutonium-239/240 and americium-241 on the HEPA filters will be calculated from ratios with cesium-137 from reported 1995 actual emissions. NDA methodology for the 296-A-10 stack is provided in 97-EAP-225.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>
Periodically smears will be taken of the SWDBs during transfer operations prior to insertion into the tunnel. Records of smears, HEPA tests and NDA analysis must be made available to WDOH upon request.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The total unabated dose due to emissions from the 296-A-10 stack (including current inventory, placement of rail cars into the PUREX Tunnel, and proposed increase in inventory) cannot exceed 7.8E-04 mrem per year to the MEI.	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
The total abated dose limit is 3.9E-07 mrem per year to the MEI.	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, and indicate whether or not any potential for airborne release occurred (WAC 246-247-080(6)).	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.
All transfers of additional radioactive materials from various onsite facilities to the PUREX Tunnel must take place during the period in fiscal years 2000 through 2010.	Not Applicable	CDM: N/A. Comment: The stack was deactivated and isolated during PUREX deactivation before the issuance of the AOP and has not been reactivated.

Emission Unit : (200W) P-296S016-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 337

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: As built drawings. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: As built drawings. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: DOE/RL-2003-19, Rev.0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions", (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200W) S-296S021-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 254

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Backup Exhaust Abatement Technology: Fan Required Units: 1 Add'l Description: Operates independently or in parallel with primary exhaust	Continuous	CDM: As-built drawings. Comment: H-2-46710, H-2-46518, H-2-81072.
Zone or Area: Primary Exhaust Abatement Technology: Fan Required Units: 3 Add'l Description: In parallel, serves both hot cell addition & main lab.	Continuous	CDM: As-built drawings. Comment: H-2-46710, H-2-46518, H-2-81072.
Zone or Area: 222S Lab Complex Abatement Technology: HEPA Required Units: 1 Add'l Description: For both primary and bachup exhaust systems	Continuous	CDM: As-built drawings. Comment: H-2-46710, H-2-46518, H-2-81072.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: 222-S Lab Hot Cells Abatement Technology: HEPA Required Units: 3 Add'l Description: In series for both the primary and backup exhaust system	Continuous	CDM: As-built drawings. Comment: H-2-46710, H-2-46518, H-2-81072.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week samples/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: DOE/RL-2003-19, Rev.0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Hot Cell Expansion **Permit:** AIR-Feb11 **Date:** 02-28-1992 **NOC ID:** 10
Date In AOP: 07-02-2001 **Date Obsolete:** 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Exhaust air shall pass through existing HEPAs in the 222-SC and 222-SB facilities prior to discharge to the atmosphere.	Continuous	CDM: As-built drawings. Comment: H-2-46710, H-2-46518, H-2-81072.
HEPA filters shall be tested in place to ensure that they remove at least 99.95 percent of particles using a DOP aerosol as defined in ASME N510 or approved equivalent.	Continuous	CDM: Leak rate test data reports. Comment:
The source term shall not exceed 7.84E-2 curies of SR-90 and 3.92E-2 curies of CS-137. If the project exceeds this projected source term, additional notification will be required.	Continuous	CDM: Engineering calculations. Comment:

Emission Unit : (200W) S-296S023-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 438

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-2-46613.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: As-built drawing. Comment: H-2-46613.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-2-46613.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: NDA Sampling Frequency: 1 every 2 years Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: A NDA will be performed within 2 years of the AOP issue date. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Truck Transfers to 204-AR , Rev. 0 Permit: AIR 91-1101 Date: 11-12-1991 NOC ID: 8
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
The dose to the maximally exposed individual (MEI) shall not exceed 0.039 mrem/year.	Not Applicable	CDM: N/A. Comment: There were no truck transfers during the reporting period.

NOC: Truck Transfers to 204-AR , Rev 0A **Permit:** NRA **Date:** 01-19-1999 **NOC ID:** 8
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Complete and submit log sheets of waste transfers.	Not Applicable	CDM: N/A. Comment: There were no truck transfers during the reporting period.

Emission Unit : (200W) P-296SX-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 64

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 1 flow path	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 1 flow path	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 1 flow path	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number W111. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: Rotary Mode Core Sampling Systems at 241-SX **Permit:** AIR 97-1101 **Date:** 11-13-1997
NOC ID: 242 **Date In AOP:** 07-02-2001 **Date Obsolete:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Due to uncertainties in tank content and to assure that conditions are adequately monitored, the SX exhauster must be continuously sampled whenever samples are being collected under the umbrella of the NOC in rotary mode.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
The existing sampling system may be used, providing it successfully passes an inspection by the department. That inspection can be arranged as soon as the project is ready to proceed. The sampling system must be isokinetic or subsisokinetic.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
Records must clearly indicate when core samples are being collected in rotary mode versus push mode.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
During push mode sampling, periodic confirmatory sampling may be conducted; in the manner currently documented in the Air Operating Permit for 296-S-15.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
Only those activities described specifically in this NOC may be conducted. No inferences to other projects will be allowed.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
The offsite projected abated dose to the Maximally Exposed Individual was verified with CAP-88 PC, after several conversations with Hanford staff to assure us that we were using the same parameters. The CAP-88 run in the NOC was the mainframe version, using parameters that the department has not approved. The officially accepted calculation for verification is the PC version, which is the only version we have. All issues between the two versions were satisfactorily resolved for this project.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
This project is only approved for the 241-SX-101 through 105 tanks, in any combination, not to exceed eight cores per year. No other tanks in the SX Tank Farm may be sampled under this NOC;, since no data for those tanks is provided.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
The SX tank being sampled during rotary mode core sampling must be actively ventilated at all times.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The process description in Section 6.0, with the equipment described, is the only activity and equipment approved. The sequence of events to protect the air pathway must be followed. No processes are approved, unless described in this section.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
All activities associated with this approval must be proceduralized prior to beginning the project.	Continuous	<p>CDM: CH2M HILL compliance matrix.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
Health physics and existing near field monitoring must be routinely performed to verify that no fugitive emissions occur. The fan or fans must be operated sufficiently to ensure that tank pressure is maintained below atmospheric pressure. If negative pressure is lost in the tank being sampled in rotary mode, the drill system must be shut down.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The HEPA filters must be successfully demonstrated to have passed an efficiency test prior to operating the RMCS in rotary mode. It must be at least 99.95% efficient (for 0.3 micron median diameter particles).	Continuous	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
Abated emissions of each radionuclide are limited to those in Table 8. No radionuclide that is not listed in this table may be emitted in any detectable concentrations (using current laboratory detection methods).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The offsite dose limit for this project, added to current SX Tank Farm emissions, may not exceed 2.0 E-6 mrem/year to the maximally exposed individual.	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
(From 5/22/02) The HEPA filters must be successfully demonstrated to have passed an efficiency test prior to operating the RMCS in rotary mode. It must be at least 99.95% efficient (using a	Continuous	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
DOP aerosol as defined in ASME N510 or approved equivalent).		

NOC: Saltwell Pumping Permit: RTAM Date: 03-12-1998 NOC ID: 263 Date In AOP: 07-02-2001 Date Obsolete: 10-15-2002

No WDOH Conditions for this NOC.

NOC: Saltwell Pumping Permit: RTAM Date: 07-02-1998 NOC ID: 283 Date In AOP: 07-02-2001 Date Obsolete: 12-31-2002

No WDOH Conditions for this NOC.

NOC: Saltwell Pumping Tanks 241-SX-101, 241-SX-102, 241-SX-103, and 241-SX-105 Permit: AIR 00-108 Date: 02-09-2000 NOC ID: 423 Date In AOP: 07-02-2001 Date Obsolete: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable Compliance Determination Methods. Comment:
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	CDM: CH2M HILL compliance matrix/work packages. Comment:
This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)) and will at that time, constitute a revision of the Radioactive Air Emissions License.	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in the NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emission control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL training program. Comment:</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>	<p>Continuous</p>	<p>CDM: CH2M HILL quality assurance program. Comment:</p>
<p>The department reserves the right to inspect and audit this unit during operation. This includes all activities, equipment, operation procedures, documents, data, and other records related to compliance with the regulations (WAC 246-247-080 (1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H. (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management. Comment:</p>
<p>Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be</p>	<p>Continuous</p>	<p>CDM: CH2M HILL records management.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
retained for at least five years (WAC 246-247-080 (8)).		Comment:
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003. Comment:
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards(WAC 246-247-040)include unit specific emission limits (paragraph 5), the offsite dose standard(paragraph 1), BARCT(paragraph 3)or ALARACT(paragraph 4), whichever is applicable, or any limitations included in this approval(paragraph 5).</p>	Continuous	CDM: CH2M HILL notification procedures and notification logbook. Comment:
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall make requested documents available for timely review (WAC 246-247-080(10)).	Continuous	CDM: CH2M HILL records management. Comment:
The work approved in this NOC is limited to saltwell pumping in tanks 241-SX-101, 241-SX-102, 241-SX-103 and 241-SX-105 in the 241-SX-Tank Farm.	Continuous	CDM: Field interviews. Comment:

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Approved saltwell pumping activities include the following: installation of the saltwell screen, installation of jet pump, flushing the transfer lines, transferring of the liquid waste (via the pumping process), addition of limited amounts of water to prevent plugging of the saltwell screen and transfer line, and miscellaneous activities that will not increase emissions.</p>	<p>Continuous</p>	<p>CDM: Field interviews. Comment:</p>
<p>Unabated alpha emissions are limited to 1.04 E-04 Ci/yr., beta emissions are limited to 6.33E-03 Ci/yr., and Cs-137 emissions are limited to 8.68E-04 Ci/yr.</p>	<p>Continuous</p>	<p>CDM: Verified that the release information used to determine unabated emissions in the NOC application has not increased. Comment:</p>
<p>The total unabated emissions are limited to 2.03E-02 mrem/yr.</p>	<p>Continuous</p>	<p>CDM: Verified that the release information used to determine unabated emissions in the NOC application has not increased. Comment:</p>
<p>The total abated emissions are limited to 1.02E-05 mrem/yr.</p>	<p>Continuous</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003. Comment:</p>
<p>The average stack flow rate of 2.8 cubic meters per second. Testing of the HEPA filters will be performed annually.</p>	<p>Continuous</p>	<p>CDM: Field interviews and ABCASH Program. Comment:</p>
<p>When this project is completed, or operations cease, the facility shall notify the department via a report of closure, and indicate whether or not any potential for airborne release occurred (WAC 246-247-080(6)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

Emission Unit : (200W) P-296P022-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 53

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: CH2M HILL documents and field interview. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Intermittent	CDM: CH2M HILL documents and field interview. Comment: There is no longer a pre-filer associated with this emission unit. Previously reported in 2002 report that the unit was replaced under Project W-314.
Zone or Area: Abatement Technology: Heater Required Units: Non operational Add'l Description:	Intermittent	CDM: CH2M HILL documents and field interview. Comment: The heater equipment is not installed for this emission unit. Previously reported in 2002 report that the unit was replaced under Project 2002.
Zone or Area: Abatement Technology: Moisture Separator Required Units: 1 Add'l Description:	Intermittent	CDM: CH2M HILL documents and field interview. Comment: There is no longer a moisture separator associated with this emission unit. Previously reported in 2002 report that the unit was replaced under Project W-314.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 in series	Continuous	CDM: CH2M HILL documents and field interview. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number W191. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200W) P-296SY-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 56

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: Non operational Add'l Description:	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: ABCASH Program, EDP code number W190. Comment: This is a back-up unit, which did not operate for the required 4 weeks in calendar year 2002, however it was monitored continuously while operating. The other EDP codes associated with the SY farms are W145 and W195.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: Mixer Pump Replacement Permit: AIR 95-203 Date: 02-21-1995 NOC ID: 62
Date In AOP: 07-02-2001 Date Obsolete: 10-15-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Process Description: This NOC describes the activities required to safely remove and replace the mixer pump in 101-SY in the event of pump failure, and assesses the potential for increased air emissions associated with those activities.	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
Control System: Potential emissions are to be controlled by a flush and decontamination system and a flexible receiver system which maintains tank containment during pump decon and removal, prevents waste spills while pump is maneuvered into	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
Monitoring System: The flexible receiver system contains a gamma detection system to monitor the decon process. HPT coverage will monitor radiation levels outside the tank.	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
Dose: 2.0 E-06 mrem/yr.	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.

NOC: Crust Growth Near-Term Mitigation Permit: Shortform Approval Date: 04-23-1999 NOC ID: 358
Date In AOP: 07-02-2001 Date Obsolete: 10-15-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all requirements and limitations of this license.	Not Applicable	CDM: Refer to other conditions for applicable compliance determination methods. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
This approval, with its conditions and limitations, constitutes and amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit.	Not Applicable	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
If the department finds that the emission unit described in this NOC, is not in compliance with the standards in WAC 245-247-040 during construction, as described in this NOC, or during operation, it reserves the right to require modifications to bring it into compliance.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Periodic confirmatory sampling is required. It must consist of: As described in the NOC, the task specific confirmatory monitoring called out in the TWRS ALARACT Demonstration.	Not Applicable	<p>CDM: CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
U.S. DOE shall monitor this project or emission unit as follows: As stated in this NOC and the original NOC titled Mixer pump test in tank 241-SY-101.	Not Applicable	<p>CDM: CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use an maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures.	Not Applicable	<p>CDM: CH2M HILL training program. CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)).	Not Applicable	<p>CDM: CH2M HILL quality assurance program. CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL quality assurance program. CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H.</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>All measured or calculated emissions must be reported annually.</p>	<p>Not Applicable</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. (Note: Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL notification procedures and notification logbook. CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5)).		
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred.	Continuous	<p>CDM: A Closure Report was approved on October 15, 2002.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
The facility must maintain a log in an approved format for this activity or emission unit.	Not Applicable	<p>CDM: CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years.	Not Applicable	<p>CDM: CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections. At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall make requested documents available in a timely manner for review.	Not Applicable	<p>CDM: CH2M HILL records and field interview.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The process is limited to the exact description described in the NOC.	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
The required controls are: As per NOC.	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
The radionuclides are limited to: As per NOC	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
The annual possession quantity is limited to: As per NOC.	Not Applicable	CDM: CH2M HILL records and field interview. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.
The abated emission limit is: 1.89E-05 mrem/yr to the MEI.	Not Applicable	CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002. A closure report was approved for the emission unit NOC on October 15, 2002.

Emission Unit : (200W) P-296P028-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 54

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Backup exhauster, intermittent operation	Continuous	CDM: Field Interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 in series	Continuous	CDM: Field interviews. Comment:

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: Non operational Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: ABCASH Program, EDP code number W195. Comment: This is a back-up unit, which did not operate for the required 4 weeks during calendar year 2002, however, it was monitored continuously when operating. The other EDP codes associated with the SY farms are W145 and W190.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200W) W-PORTEX 020

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 57

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Fan is in operational standby	Continuous	CDM: Field interviews. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: HEPAs in series	Continuous	CDM: Field interviews. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Active ventilation: continuous during operation. Sampling Frequency: 4 weeks/year Radionuclide Requiring Measurement: TOTAL ALPHA/TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E045. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.

NOC: Use of a Portable Exhauster During Saltwell Pumping, Rev 2 **Permit:** AIR 98-1207 **Date:** 12-16-1998
NOC ID: 327 **Date In AOP:** 07-02-2001 **Date Obsolete:** 10-25-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable compliance determination methods. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction. All activities are limited to these tanks. 241-AX-101, 241-BY-105, 241-BY-106, 241-S-101, 241-S-102,	Continuous	CDM: CH2M HILL work packages. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>241-S-103, 241-S-106, 241-S-107, 241-S-109, 241-S-111, 241-S-112, 241-U-103, 241-U-105, 241-U-106, 241-U-107, 241-U-108, 241-U-109, 241-U-111</p>		
<p>This approval, with its Conditions and Limitations, constitutes and amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c).</p>	<p>Continuous</p>	<p>CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006.</p> <p>Comment:</p>
<p>All portable exhausters used in the salt-well pumping must meet the requirements specified in 40 CFR 61, Subpart H and associated requirements.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Periodic confirmatory sampling is required on passively ventilated tanks. It is outlined in the draft Air Operating Permit. It must consist of annual verification of smearable levels of activity on the inside surface of the ducting downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent, if one exists.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use an maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit</p>	<p>Continuous</p>	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.		the period of January 1 - December 31, 2002.
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site, scheduled for submittal by June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. (Note: Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable,	Continuous	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
or any limitations included in the approval (paragraph 5)).		
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080(8)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements, they must be given to the department when they are known to allow for unannounced inspections as required by EPA (WAC 246-247-080(9)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall make requested documents available in a timely manner for review. (WAC 246-247-080(10)).	Not Applicable	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All preoperational activities described in the NOC must be satisfactorily completed prior to waste transfer.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This emission unit did not operated during the period of January 1 - December 31, 2002.</p>
Portable exhausters will be available during transfer and used when flammable gases concentrations exceed 25 percent of the lower flammability limit (LFL) during salt-well pumping.	Continuous	<p>CDM: Field interviews.</p> <p>Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.</p>
All other commitments made in the NOC are considered requirements. Any deviation from those commitments must be approved by the department.	Continuous	<p>CDM: Field interviews.</p> <p>Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.</p>

NOC: Use of a Portable Exhauster During Saltwell Pumping, Rev 2B **Permit:** NRA **Date:** 07-31-1999
NOC ID: 380 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Conditions of AIR 98-1207 apply to portable exhauster use on single shell tanks 241-A-101 and 241-U-102.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

Emission Unit : (200) W-PORTEX 024

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 58

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Fan is in operational stand-by	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 HEPAs in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Active ventilation: continuous during operation. Sampling Frequency: 4 weeks/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E046. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: Use of a Portable Exhauster During Saltwell Pumping, Rev 2 **Permit:** AIR 98-1207 **Date:** 12-16-1998
NOC ID: 327 **Date In AOP:** 07-02-2001 **Date Obsolete:** 10-25-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: For the approval order, in compliance with all approval conditions. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction. All activities are limited to these tanks. 241-AX-101, 241-BY-105, 241-BY-106, 241-S-101, 241-S-102, 241-S-103, 241-S-106, 241-S-107, 241-S-109, 241-S-111, 241-S-112, 241-U-103, 241-U-105, 241-U-106, 241-U-107, 241-U-108, 241-U-109, 241-U-111	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
This approval, with its Conditions and Limitations, constitutes and amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
All portable exhausters used in the salt-well pumping must meet the requirements specified in 40 CFR 61, Subpart H and associated requirements.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to action to be completed in the future, or that pertain to actions required of the agency.
Periodic confirmatory sampling is required on passively ventilated tanks. It is outlined in the draft Air Operating Permit. It must consist of annual verification of smearable levels of	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
activity on the inside surface of the ducting downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent, if one exists.		
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertains to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12).	Continuous	<p>CDM: CH2M HILL training program.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to action to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertains to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. (Note: Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5)).	Continuous	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertains to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080(8)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements, they must be given to the department when they are known to allow for unannounced inspections as required by EPA (WAC 246-247-080(9)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The facility shall make requested documents available in a timely manner for review. (WAC 246-247-080(10)).	Continuous	CDM: CH2M HILL records management. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
All preoperational activities described in the NOC must be satisfactorily completed prior to waste transfer.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002. It is assumed that, based on interviews, the proportional activities or in actuality pre-operational activities are completed before waste transfers.
Portable exhausters will be available during transfer and used when flammable gases concentrations exceed 25 percent of the lower flammability limit (LFL) during salt-well pumping.	Not Applicable	CDM: Field interviews Comment: This NOC was not used during the period of January 1 - December 31, 2002.
All other commitments made in the NOC are considered requirements. Any deviation from those commitments must be approved by the department.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.

NOC: Use of a Portable Exhauster During Saltwell Pumping, Rev 2B **Permit:** NRA **Date:** 07-31-1999
NOC ID: 380 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Conditions of AIR 98-1207 apply to portable exhauster use on single shell tanks 241-A-101 and 241-U-102.	Not Applicable	CDM: Field interviews Comment: This NOC was not used during the period of January 1 - December 31, 2002.

Emission Unit : (200) W-PORTEX 025

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 50

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Fan is in operational stand-by	Continuous	CDM: Field interviews. Comment:

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 HEPAs in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Active ventilation: continuous during operation. Sampling Frequency: 4 weeks/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number E047. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

NOC: Use of a Portable Exhauster During Saltwell Pumping, Rev 2 **Permit:** AIR 98-1207 **Date:** 12-16-1998
NOC ID: 327 **Date In AOP:** 07-02-2001 **Date Obsolete:** 10-25-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable Compliance Determination Methods. Comment: This NOC was not used during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction. All activities are limited to these tanks. 241-AX-101, 241-BY-105, 241-BY-106, 241-S-101, 241-S-102,	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.

WDOH Conditions	Comp. Status	Compliance Determination Method
241-S-103, 241-S-106, 241-S-107, 241-S-109, 241-S-111, 241-S-112, 241-U-103, 241-U-105, 241-U-106, 241-U-107, 241-U-108, 241-U-109, 241-U-111		
This approval, with its Conditions and Limitations, constitutes and amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c).	Continuous	<p>CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006.</p> <p>Comment:</p>
All portable exhausters used in the salt-well pumping must meet the requirements specified in 40 CFR 61, Subpart H and associated requirements.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to action to be completed in the future, or that pertain to actions required of the agency.</p>
Periodic confirmatory sampling is required on passively ventilated tanks. It is outlined in the draft Air Operating Permit. It must consist of annual verification of smearable levels of activity on the inside surface of the ducting downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent, if one exists.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12).	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit	Continuous	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: This NOC was not used during the period</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.		of January 1 - December 31, 2002.
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. (Note: Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable,	Continuous	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
or any limitations included in the approval (paragraph 5)).		
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080(8)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements, they must be given to the department when they are known to allow for unannounced inspections as required by EPA (WAC 246-247-080(9)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall make requested documents available in a timely manner for review. (WAC 246-247-080(10)).	Continuous	<p>CDM: CH2M HILL records management</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
All preoperational activities described in the NOC must be satisfactorily completed prior to waste transfer.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
Portable exhausters will be available during transfer and used when flammable gases concentrations exceed 25 percent of the lower flammability limit (LFL) during salt-well pumping.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>
All other commitments made in the NOC are considered requirements. Any deviation from those commitments must be approved by the department.	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: This NOC was not used during the period of January 1 - December 31, 2002.</p>

NOC: Use of a Portable Exhauster During Saltwell Pumping, Rev 2B **Permit:** NRA **Date:** 07-31-1999
NOC ID: 380 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Conditions of AIR 98-1207 apply to portable exhauster use on single shell tanks 241-A-101 and 241-U-102.	Not Applicable	CDM: Field interviews. Comment: This NOC was not used during the period of January 1 - December 31, 2002.

Emission Unit : (200W) S-296S025 001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 59

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Emission unit operates intermittently	Continuous	CDM: Field interviews. Comment: The exhauster shut down several times during CY 2002, and reported per the CH2M HILL notification procedure.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description: Heater runs intermittently due to temperature Regulation	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: De-entrainer Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number W145. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program Comment:

(No NOC records were found.)

Emission Unit : (200W) W-PORTEX 027

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 344

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: NDA ; operating log; smear seams and potential release locations on the portable exhauster Sampling Frequency: NDA of filter at the end of the calendar year; smear seams and potential release locations at the end of each day	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3)	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

NOC: 241-UX-154 Diversion Box **Permit:** AIR 99-1003 **Date:** 10-06-1999 **NOC ID:** 401
Date In AOP: 07-02-2001 **Date Obsolete:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Refer to other conditions for applicable compliance determination methods. Comment: This emission unit did not operate during the period of January 1 - December 31, 2002.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	CDM: CH2M HILL compliance matrix/work packages. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)), and will at that time, constitute a revision of the Radiation Air Emissions License.	Continuous	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment:
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in this NOC or during operation), it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Periodic confirmatory emission monitoring shall be verified using the following two methods. (1) Non destructive analysis to be performed at the end of the calendar year, and log is to be maintained with a record of the exhauster's activities for the pit work. This log shall include information as to location, start and stop time and date, total of hours of operation with purpose specified. Additionally, the ductwork, seams and potential release locations on the portable exhauster shall be smeared at the end of each day to demonstrate that no contamination is escaping. The results of this shall be entered as part of the exhauster's record log. In the event that the exhauster is used on different emission units, the Department of Health reserves the right to request a nondestructive analysis / assay (NDA) after each exhauster job assignment (WAC 246-247-075(3)).</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: CH2M HILL training program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>	<p>Continuous</p>	<p>CDM: CH2M HILL quality assurance program.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The department reserves the right to</p>	<p>Not</p>	<p>CDM: N/A.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080 (1)).	Applicable	Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
All reports and records must be kept and reported according to 40 CFR 61, Subpart H. (WAC 246-247-080(2)).	Continuous	CDM: CH2M HILL records management. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
If there is an unexpected release of radioactivity or is there is a shutdown or other condition that, if it were allowed to persist, would result in emissions or radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5).	Continuous	CDM: CH2M HILL notification procedures and notification logbook. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
When this project is completed, or operations cease, the facility shall notify the department and indicate whether or not any potential for airborne release occur (WAC 246-247-080(6)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions

WDOH Conditions	Comp. Status	Compliance Determination Method
		required of the agency.
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080 (8)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).	Continuous	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The abated dose limit shall not exceed 1.53E-02 mrem/yr. to the MEI.	Continuous	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
The process for approved activities are limited to those listed below. No other processes are approved. Department inspectors will verify this condition. Removal and/or installation of cover blocks: Inspections: Installation, disconnection, changing, leak testing, and cutting up jumpers/blanks or other pit equipment: Repairing/replacing valves, jumpers, pumps, leak detectors, or other instrumentation/Equipment: Decontamination activities: Applying fixative with cover blocks on or off: Clearing drains and checking the flow of drains: Unplug Transfer Lines:	Not Applicable	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The required controls are as follows: Abatement control technology: The portable exhauster providing active ventilation within the bullpen shall consist of a pre-filter, one HEPA filter, and a blower that draws air through the filters and pushes air out an exhaust port. Alaract: Radiation control technicians shall inspect and approve required containment; Pit work shall be shut down (or not be initiated) when sustained wind speeds exceed 25 miles per hour or are predicted to do so by Hanford Meteorological Station personnel for the period of planned pit work; The opening of the bullpen shall not exceed an area one-third the size of a fully opened roof; Affected transfer lines shall be flushed with cover blocks in place; Jumpers or other instrumentation/equipment removed from the pit shall be drained of free liquid and decontaminated or contained before removal. The outer-most surface shall not exceed 1,000 disintegrations per minute/100 square centimeters beta/gamma and 20 disintegrations per minute/100 square centimeters alpha before removal from the bullpen; Only blocks necessary to perform intended work shall be removed. At the end of the work shift, the cover blocks shall be re-installed unless waste in the pit is contained in transfer lines or other pit equipment; Active ventilation of the bullpen shall be used after removal of the cover blocks and during work activities to minimize radiological releases. Air inflow shall be achieved by using a 1,000 cubic feet per minute exhauster; The inlet and outlet of the ventilation system will be sealed with plastic when the ventilation system is not in operation;</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>
<p>The radionuclides and annual possession quantities are limited to those stated in the following table. SUMMARY OF OVERALL EMISSIONS FOR 241-UX-154 PIT WORK ISOTOPE ANNUAL POSSESSION QUANTITY CURIES UN/ABATED RELEASE CURIES UNABATED OFFSITE DOSE MREM/YEAR PERCENT</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>OFOFFSITEDOSE 3H 6.30E-01 6.17E-05 1.23E-09 0.00% 14C 9.48E-02 9.29E-06 1.86E-08 0.00% 59Ni 1.53E-02 1.50E-06 3.61E-10 0.00% 60Co 4.30E-01 4.22E-05 8.01E-06 0.05% 63Ni 1.45E+00 1.43E-04 2.85E-08 0.00% 79Se 9.26E-03 9.08E-07 9.08E-08 0.00% 90Y 6.94E+02 6.80E-02 1.77E-05 0.12% 90Sr 6.94E+02 6.80E-02 5.99E-03 39.18% 93mNb 3.35E-02 3.29E-06 2.27E-30 0 .00% 93Zr 4.49E-02 4.40E-06 4.38E-09 0.00% 99Tc 6.70E-01 6.57E-05 1.18E-06 0.01% 106Ru 1.95E-05 1.91E-09 2.25E-11 0.00% 113mCd 2.37E-01 2.32E-05 2.32E-06 0.02% 125Sb 4.63E-01 4.54E-05 9.52E-07 0.01% 126Sn 1.39E-02 1.36E-06 5.03E-08 0.00% 129I 1.30E-03 1.27E-07 9.65E-09 0.00% 134Cs 7.20E-03 7.06E-07 5.51E-08 0.00% 137Cs 9.43E+02 9.24E-02 1.94E-03 12.70% 137mBa 8.91E+02 8.74E-02 7.52E-15 0.00% 151Sm 3.27E+01 3.21E-03 1.86E-06 0.01% 152Eu 1.30E-02 1.27E-06 2.42E-07 0.00% 154Eu 4.49E+00 4.40E-04 6.60E-05 0.43% 155Eu 9.72E-01 9.53E-05 6.00E-07 0.00% 226Ra 1.09E-06 1.07E-10 3.86E-11 0.00% 228Ra 3.83E-04 3.76E-08 5.64E-09 0.00% 227Ac 5.38E-06 5.27E-10 5.80E-09 0.00% 229Th 8.96E-06 8.78E-10 1.05E-08 0.00% 232Th 3.16E-05 3.09E-09 1.92E-08 0.00% 231Pa 1.14E-05 1.12E-09 9.98E-09 0.00% 232U 2.27E-03 2.23E-07 1.91E-06 0.01% 233U 8.69E-03 8.52E-07 2.04E-06 0.01% 234U 9.52E-03 9.34E-07 2.24E-06 0.01% 235U 3.76E-04 3.68E-08 8.47E-08 0.00% 236U 4.91E-04 4.81E-08 1.11E-07 0.00% 238U 7.56E-03 7.41E-07 1.56E-06 0.01% 237Np 2.41E-03 2.37E-07 2.11E-06 0.01% 238Pu 1.45E-01 1.42E-05 8.39E-05 0.55% 239Pu 2.39E+00 2.34E-04 1.50E-03 9.80% 240Pu 4.29E-01 4.20E-05 2.69E-04 1.76% 241Pu 5.45E+00 5.35E-04 5.35E-05 0.35% 242Pu 1.28E-04 1.26E-08 7.68E-08 0.00% 241Am 5.55E+00 5.45E-04 5.34E-03 34.91% 243Am 6.57E-05 6.44E-09 6.31E-08</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
0.00% 242Cm 4.78E-03 4.69E-07 1.50E-07 0.00% 243Cm 4.60E-04 4.51E-08 2.97E-07 0.00% 244Cm 1.06E-02 1.04E-06 5.40E-06 0.04% TOTAL 3.28E+03 3.21E-01 1.53E-02 100.00%		
To assure the intent of the ALARACT standard is sustained, and the adequacy of the design for the control technology equipment is maintained, continuous personnel coverage shall be employed while this equipment is in operation.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
This license approval is valid until July 14, 2004.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The total annual possession quantity is limited to 3.28E+03 curies.	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

**NOC: Double-Contained Receiver Tank Pit Work Permit: NRA Date: 09-05-2000 NOC ID: 492
Date In AOP: 07-02-2001**

WDOH Conditions	Comp. Status	Compliance Determination Method
Primary Controls (The following activities require pre-job and post-job radiation surveys, and 25 mph wind speed controls) * Perform remote inspections with cover blocks on * Perform decontamination of pit surfaces or pit contents with cover blocks on * Apply fixative with cover blocks on * Flush drains and check flow of drains with cover blocks on	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of July 2 - December 31, 2001.
Secondary Controls (The following activities require installation of a fall protection handrail draped in plastic forming a contamination barrier around the top of the pit) * Remove/replace cover blocks * Perform inspections with cover blocks off * Perform decontamination of pit contents with cover blocks off * Apply fixative with a hand held sprayer with cover blocks off *	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of July 2 - December 31, 2001.

WDOH Conditions	Comp. Status	Compliance Determination Method
Flush drains and check flow of drains with cover blocks off * Repair/replace/move leak detectors or other pit instrumentation/equipment with cover blocks off		
Tertiary Controls (The following activities require installation of a fall protection handrail draped in plastic forming a contamination barrier around the top of the open pit and a bullpen with an operating portable exhauster) * Removal of cover blocks and performing - Install, disconnect, change or cut up jumpers/blanks, valves or nozzles	Not Applicable	CDM: Field interviews. Comment: The emission unit did not operate during the period of July 2 - December 31, 2001.

Emission Unit : (200W) P-242S-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 163

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 parallel flow paths	Continuous	CDM: Field Interviews Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 in parallel with 2 in series	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 2 in parallel	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number W096. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200W) P-242T-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 162

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 in parallel	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 4 Add'l Description: 2 trains with 2 parallel flow paths with 2 HEPAs in series (Minimum of 1 train operates at a time)	Continuous	CDM: Field interviews. Comment:
Zone or Area: Abatement Technology: Heater Required Units: Non operational Add'l Description:	Continuous	CDM: Field interviews. Comment: Heater is non operational.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: ABCASH Program, EDP code number W117. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL NESHAPS quality assurance program. Comment:

(No NOC records were found.)

Emission Unit : (200W) CWC

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 439

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(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Environment Sampling; Ambient air monitors N-449, N-457, N-964, and N-433 Sampling Frequency: Near field ambient monitoring program	Continuous	CDM: Required near-facility monitoring was conducted as reported in the ABCASH database. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Enhanced Radioactive and Mixed Waste Storage, Rev 1 **Permit:** RTAM **Date:** 08-24-1998
NOC ID: 295 **Date In AOP:** 07-02-2001 **Date Obsolete:** 07-29-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all requirements and limitations of this license.	Continuous	CDM: Complied with all NOC approval conditions for this unit. Comment:
This approval, with its conditions and limitations, constitutes an amendment to the Department's Radioactive Air Emissions License. This amendment must be included in the next revision of the Hanford Air Operation Permit.	Not Applicable	CDM: N/A. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

WDOH Conditions	Comp. Status	Compliance Determination Method
Periodic confirmatory sampling is required. It must consist of: As in Section 9 of the referenced NOC.	Continuous	<p>CDM: Solid Waste Storage and Disposal Radiological Control Scheduled Radiation Survey Task Description SWP-Q101.</p> <p>Comment:</p>
U.S. DOE shall monitor this project or emission unit as follows: See other conditions.	Continuous	<p>CDM: Complied with other conditions related to monitoring.</p> <p>Comment:</p>
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use an maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures.	Continuous	<p>CDM: Facility training records</p> <p>Comment:</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)).	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions"</p> <p>Comment:</p>
The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions"</p> <p>Comment:</p>
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The department may require an ALARACT demonstration at any time.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H.	Continuous	<p>CDM: Administrative procedure WMP-342-1.2 (Records Program). For reporting, Input to the most recent radionuclide air emissions report (e.g., DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002.")</p> <p>Comment:</p>
All measured or calculated emissions must be reported annually.	Continuous	<p>CDM: Input to the most recent radionuclide air emissions report (e.g., DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002.")</p> <p>Comment:</p>
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. (Note: Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: No reports were required.</p>
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne release occur.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The facility must maintain a log in an approved format for this activity or emission unit.	Continuous	<p>CDM: The Solid Waste Information and Tracking System (SWITS) is used as a log for this activity.</p> <p>Comment:</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years.	Continuous	<p>CDM: Administrative procedure WMP-342-1.2 (Records Program).</p> <p>Comment:</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections. At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.	Continuous	<p>CDM: "Memorandum of Understanding for Initial Point of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001.</p> <p>Comment:</p>
The facility shall make requested documents available in a timely manner for review.	Continuous	<p>CDM: Administrative procedure WMP-342-1.2 (Records Program).</p> <p>Comment:</p>
The process is limited to the exact description described in this NOC.	Continuous	<p>CDM: HNF-SD-WM-ISB-007 (Interim Safety Basis for the Central Waste Complex)</p> <p>Comment:</p>
The required controls are: As in Section 6 of this NOC.	Continuous	<p>CDM: 1. HNF-EP-0063 Hanford Site Solid Waste Acceptance Criteria. 2. HNF-5173 PHMC Radiological Control Manual</p> <p>Comment 1. Requires Nucfil filters for venting containers. 2. Describes corrective actions for positive smears.</p>
The radionuclides are limited to: As in Section 8 of this NOC.	Continuous	<p>CDM: SWITS database</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The annual possession quantity is limited to: As in Section 9 of this NOC.	Continuous	CDM: Basis for APQs in NOC Application verified. Comment:
The abated emission limit is 2.4E-5 mrem/yr to the MEI.	Continuous	CDM: Input to the most recent radionuclide air emissions report (e.g., DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002.") Comment:
Ambient air monitors N-449, N-457, N-964, N-433 shall be maintained for the duration of this project as monitors for diffuse fugitive emissions	Continuous	CDM: Required near-facility monitoring was conducted as reported in the ABCASH database. Comment:
Container inventory shall be tracked (logged) using the SWITS database.	Continuous	CDM: Procedure WMP-370-5.01 "SWITS Data Entry For Waste" Comment:
If a positive smear is detected (>20dpm/100cm ² alpha and > 10,000 dpm/100cm ² for beta/gamma) while performing the routine survey as in Attachment A, the department shall be notified.	Not Applicable	CDM: N/A. Comment: This requirement was removed. (NOC revision approved 1/4/00)

NOC: Enhanced Radioactive and Mixed Waste Storage, Rev 1A **Permit:** NRA **Date:** 01-04-2000
NOC ID: 419 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Weekly smear sampling of 30 NucFil® filters is no longer required	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Periodic confirmatory measurement is a quarterly air sample collected for a two-week interval.	Continuous	CDM: Solid Waste Storage and Disposal Radiological Control Scheduled Radiation Survey Task Description SWP-Q101. Comment:

NOC: Central Waste Complex Operations **Permit:** AIR 02-710 **Date:** 07-29-2002 **NOC ID:** 295
Date In AOP: 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	<p>CDM: Complied with all NOC approval conditions for this unit.</p> <p>Comment:</p>
The total abated emission limit for this Notice of Construction is limited to 2.40E-05 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 4.80E-02 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).	Continuous	<p>CDM: Input to the most recent radionuclide air emissions report (e.g., DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002.")</p> <p>Comment:</p>
This process is limited to: the process of managing four primary types of waste: low-level (LLW), low-level mixed (LLMW), transuranic (TRU), and TRU-mixed waste. The LLW typically contains rags, paper, rubber gloves, disposal supplies, tools, industrial waste (e.g., failed equipment), solidified process byproducts, and laboratory wastes that are contaminated with radioactive material. This waste is considered LLW if it contains radioactive material and is not classified as TRU waste, high-level waste, or spent nuclear fuel. Generally, LLW and LLMW accepted for storage at the CWC must meet the criteria for low specific activity through Type A2 quantities. Containers in excess of A2 quantities may also be accepted with a specific approved safety analysis. Although transuranic radionuclides may also be present in concentrations up to 100 nCi/g, this waste form is significantly less hazardous than TRU because the material is limited to Type A2 quantities. (Note: Contact handled TRU container limits are more than 1,000 times greater than Type A2 quantities.) TRU and TRU-mixed waste typically contains rags, paper, rubber gloves, disposable supplies, tools, industrial waste (e.g., failed equipment), solidified process byproducts, and laboratory wastes that are contaminated with TRU material. This waste must contain at least 100 nCi	Continuous	<p>CDM: HNF-SD-WM-ISB-007 (Interim Safety Basis for the Central Waste Complex)</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>of TRU material per gram of waste or it is considered LLW. The TRU waste accepted by CWC may contain varying concentrations of TRU radionuclides and limited amounts of non-TRU radionuclides. With some exceptions allowed based on safety analysis, the TRU content of waste containers is generally limited to 53 239/240 Pu dose equivalent curies (DE-Ci), where the DE-Ci is derived by multiplying the isotopic composition (i.e., weight fractions of the various TRU isotopes) by the specific activities of each isotope, and then converting that number with corrections factors taken from the Hanford Site Solid Waste Acceptance Criteria. The DE-Ci unit is designed to control inhalation dose impacts independent of radionuclide type. The radionuclides Pu-39 and Pu-240 are considered equivalent and are combined for calculation purposes. The annual possession quantity (APQ) shall be tracked by the DE curies and is represented by Pu-239 for this purpose. The CWC stores low-level (LLW), low-level mixed (LLMW), transuranic (TRU), and TRU-mixed waste. The CWC is designed for the receipt and storage of contact-handled waste packages, which are defined as packages having surface dose rate of less than 2 mSv/h (200 mrem/h). Although packages up to 200 mrem/h can be stored at CWC, an operation limit of 1 mSv/h (100 mrem/h) has been established. Each waste package is characterized before receipt and based on this information; incompatible forms of waste are physically segregated. CWC personnel receive and inspect waste packages at the Waste Receiving and Staging Area. Transport off-load operations are performed by hand truck, forklift, or crane by qualified personnel. Packages are transported, generally by forklift to the mixed waste storage pad and then to the assigned facility. Alternatively, waste packages may be received, inspected, and unloaded at the specific facility where waste will be stored. Waste containers are not opened during normal</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>operations at the CWC buildings. Under normal operating conditions there is no airborne release of radioactive material expected from opening waste containers. Inventories of TRU content, non-TRU radionuclides, and hazardous waste constituents are controlled at all waste storage facilities at the CWC. The inventory control system ensures that each building, building quadrant, or module will comply with its established inventory limit. TRU waste containers are generally equipped with a pressure relief vent device, such as the NucFil filter. This filter allows the release of any gases that may be produced as a result of radiolysis inside the container, while preventing release of any particulate matter. Waste shipments are transported to the Waste Receiving and Staging Area where the waste containers are radiologically surveyed and the exterior visually inspected for physical integrity. Waste records are checked for completeness and accuracy in accordance with procedures that provide instructions for performing detailed entry-by-entry reviews of waste records. To the extent practicable, this work is performed before unloading. However, partial unloading of a shipment may be necessary to complete a thorough survey and inspection. Verification of container contents, which may involve the opening of containers and sampling of waste contents, is performed at a facility separate from the CWC (e.g., T-Plant). Waste packages meeting all acceptance criteria are accepted for storage. Non-compliant waste packages (e.g., with paperwork errors or omissions and damaged containers) are held until the non-compliant condition is corrected to the satisfaction of the responsible Solid Waste Manager or designee. To detect leaking or deteriorating containers, or deterioration of the containment system, all waste containers are inspected on a weekly basis. To ensure access for inspection, aisles are provided and rows may be no more than two drums wide. Nominal aisle width between container rows is 76.2 cm (30 in.) for all locations</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>except the storage modules where 61 cm (24 in.) is the minimum. PermaCon unit: This approval also allows the placement of a modular containment PermaCon unit within the 2404WC Building (or similar CWC building) for the purpose of sampling the head space gas within solid waste storage containers.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Alpha 0 2.50E+04 B/G 0 2.50E+05</p>	Continuous	<p>CDM: Basis for APQs in NOC Application verified. Comment:</p>
<p>The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).</p>	Continuous	<p>CDM: Facility Training Records Comment:</p>
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	Not Applicable	<p>CDM: N/A. Comment: No reports were required.</p>
<p>Container inventory shall be tracked (logged) using the SWITS database.</p>	Continuous	<p>CDM: Procedure WMP-370-5.01 "SWITS Data Entry For Waste" Comment:</p>
<p>The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).</p>	Not Applicable	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Periodic confirmatory sampling is required. It must consist of: sampling quarterly using a portable sampler for a two-week interval inside the CWC building (excluding outdoor pads) containing vented containers with the highest cumulative inventory of DE curies during the quarter sampled. (Samples will be handled following the applicable sections of 40 CFR 61, Appendix B, Method 114).</p>	<p>Continuous</p>	<p>CDM: Solid Waste Storage and Disposal Radiological Control Scheduled Radiation Survey Task Description SWP-Q101.</p> <p>Comment:</p>
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: Administrative procedure WMP-342-1.2 (Records Program).</p> <p>Comment:</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions"</p> <p>Comment:</p>
<p>The facility must maintain a log in an approved format (SWITS database) for this activity or emission unit.</p>	<p>Continuous</p>	<p>CDM: Procedure WMP-370-5.01 "SWITS Data Entry For Waste"</p> <p>Comment:</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions"</p> <p>Comment:</p>
<p>The radionuclides are limited to: H-3, C-14, K-40, Ar-41, Cr-51, Mn-54, Fe-59, Co-58, Co-60, Zn-65, Kr-85, Sr-89, Sr-90, Y-90, Zr-95, Nb-95, Tc-99, Ru-103, Ru-106, Sn-113, Sb-124, Sb-125, I-129, I-131, Cs-134, Cs-137, Ba-137, Ce-141, Ce-144, Pm-147, Eu-152, Eu-154, Eu-155, Tl-208, Po-210, Po-212, Po-216, Bi-212, Bi-214, Pb-212, Pb-214, Rn-220, Ra-224, Ra-226, Ac-228, Th-232, Th-228, Th-234, U-232, U-233, U-234, U-235, U-236, U-238, Np-237, Pu-238, Pu-239, Pu-240, Pu-241, Pu-242, Am-241, Am-243, Cm-242, Cm-243, Cm-244, and</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0063 Hanford Site Solid Waste Acceptance Criteria.</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Cf-252 The above list of radionuclides represents all of the significant radionuclides historically present at the Central Waste Complex (CWC), including some that are not significant. Any radionuclide on the chart of the nuclides could be present or received at CWC in the future. Periodic confirmatory measurements to verify low emissions are performed by taking a two-week air sample on a quarterly basis and analyzing for total alpha and total beta. Although any radionuclide could be present, for conservatism all beta is assumed to be Cs-137 and all alpha is assumed to be Am-241 for dose calculation estimates.</p>		
<p>Ambient air monitors N-449, N-457, N-964, N-433 shall be maintained for the duration of this project as monitors for diffuse fugitive emission.</p>	Continuous	<p>CDM: Required near-facility monitoring was conducted as reported in the ABCASH database.</p> <p>Comment:</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>	Continuous	<p>CDM: "Memorandum of Understanding for Initial Point of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001.</p> <p>Comment:</p>
<p>The required controls are: Emissions control for vented containers within the</p>	Continuous	<p>CDM: 1. HNF-EP-0063 Hanford Site Solid Waste Acceptance Criteria. 2. HNF-5173 PHMC</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>CWC will consist of NucFil {tm} filters. (Under normal operating conditions, non-vented containers are not expected to produce radioactive emissions.) A NucFil {tm} filter consists of a porous carbon/carbon composite of non-activated carbon fibers housed in stainless steel that as a minimum, restricts the release of 99.95% of particles with a mean 0.3 microns in size. In addition, housekeeping (e.g., decontamination and replacing leaking containers as needed) and frequent smears throughout the CWC will be used to ensure that the emission control equipment is working properly. Smears that exceed 20 dpm/100 sqcm for alpha and 1,000 dpm/100 sqcm for beta/gamma contamination will be investigated to determine the cause of the contamination and appropriate corrective actions will be implemented.</p>		<p>Radiological Control Manual</p> <p>Comment: 1. Requires Nucfil filters for venting containers. 2. Describes corrective actions for positive smears.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
(WAC 246-247-080(6)).		
The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: Administrative procedure WMP-342-1.2 (Records Program). For reporting, input to the most recent radionuclide air emissions report (e.g., DOE/RL-2003-19, revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002").</p> <p>Comment:</p>
The department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).	Continuous	<p>CDM: Input to the most recent radionuclide air emissions report (e.g., DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002").</p> <p>Comment:</p>

Emission Unit : (200W) P-296Z014-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 391

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
<p>Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: 2 fans, 1 fan is backup</p>	Continuous	<p>CDM: Essential drawings were reviewed.</p> <p>Comment:</p>
<p>Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 3 parallel paths of 2 HEPAs in series, minimum of 1 path in operation</p>	Continuous	<p>CDM: Essential drawings were reviewed.</p> <p>Comment:</p>
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA		Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev.4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions", (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200W) P-296Z015-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 387

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Essential drawings were reviewed. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Essential drawings were reviewed. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Essential drawings were reviewed. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample Sampling Frequency: One 4 week period per year Radionuclide Requiring Measurement: TOTAL ALPHA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
		Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions", (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Liquid Low-Level Waste Treatment Facility **Permit:** AIR 92-710 **Date:** 07-30-1992 **NOC ID:** 11
Date In AOP: 07-02-2001 **Date Obsolete:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Process Description: PFP Liquid Low Level Waste Treatment Facility prior to discharge to crib 216-Z-20 Crib.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Control System: The ventilation system shall consist HEPA filters to control particulate radionuclides, which shall remove at least 99.95 percent.	Continuous	CDM: HNF-SD-CP-SDD-005, Section 3.1 was reviewed. Comment:
Monitoring: shall use record sampler. The sampler probe and system design is to be consistent with ANSI N13.1 guidance for sampling particulate matter.	Continuous	CDM: Essential drawings were reviewed. Comment:
Abated dose to the MEI is not expected to exceed 9.7E-05 mrem/yr.	Continuous	CDM: DOE/RL 2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:

Emission Unit : (200W) P-296Z003-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 386

Page in AQP: 2-150

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 2 parallel paths with minimum of 1 path in operation	Continuous	CDM: Essential drawings were reviewed. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel paths with 2 HEPAs in series, minimum of 1 path in operation	Continuous	CDM: Essential drawings were reviewed. Comment:
Zone or Area: Abatement Technology: Prefilter Required Units: 2 Add'l Description: In parallel	Continuous	CDM: Essential drawings were reviewed. Comment:
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Essential drawings were reviewed. Comment:
Zone or Area: Abatement Technology: Demister Required Units: 1 Add'l Description:	Continuous	CDM: Essential drawings were reviewed. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions", (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200W) P-296Z005-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 389

Page in AOP: 2-151

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 2 parallel flow paths with 2 fans in parallel	Continuous	CDM: Essential drawings. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 parallel 2-stage HEPA filters of 4 banks each. Abatement credit taken for one HEPA filter.	Continuous	CDM: Essential drawings. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Continuous sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions", (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Plutonium Stabilization and Handling **Permit:** AIR 01-1004 **Date:** 10-08-2001 **NOC ID:** 450
Date In AOP: 06-11-2002 **Date Obsolete:** 12-05-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).</p>	<p>Continuous</p>	<p>CDM: For this approval order, in compliance with all applicable conditions. Comment:</p>
<p>The total abated emission limit for this Notice of Construction is limited to 4.52E-04 mrem/year to the Maximally Exposed Individual. The total unabated emission limit for this Notice of Construction is limited to 1.67E+03 mrem/year to the Maximally Exposed Individual.</p>	<p>Continuous</p>	<p>CDM: DOE/RL 2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:</p>
<p>This process is limited to: stabilizing and/or repackaging plutonium, uranium, oxide, and metal for long term storage in the method described below. Within the 2736Z Building, existing vault storage cubicles may be modified to accommodate larger, long term storage canisters as described below. Activities associated with the 296-Z-7 Emission Unit. Americium, plutonium, and uranium oxides will be stabilized by heating the material in an oven to a temperature of greater than 950°C for a minimum of two hours. In-line monitoring equipment will be provided for determining the moisture/volatile content of the material processed. An alternative method will exist to use thermogravimetric mass spectrometer analysis. The material will be considered thermally stabilized when there is less than 0.5 percent loss on ignition (LOI). Representative samples of 100 percent of the packages will be subjected to LOI testing (glovebox GB-642D). The LOI process will verify dryness and suitability for packaging. The LOI process will heat a sample taken from each material batch. The sample will be weighed and placed into a muffle furnace where the sample will undergo a heating cycle similar to the stabilization process. After the heating cycle is completed, the sample will be weighed again and the beginning and ending weights compared. If the beginning and ending weights</p>	<p>Continuous</p>	<p>CDM: PFP Final Safety Analysis Report (HNF-SD-CP-SAR-021, Rev. 2). Comment: In compliance up to revisions 2B and 2C.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>differ by less than 0.5 percent, the material will go to final packaging in the BTS Module. If the difference in weights is greater than 0.5 percent, the material will be sent back through the stabilization process until the LOI result is less than 0.5 percent. The furnaces will be heated electrically. The purge gas in the LOI furnace will be nominally 1 scfm of air. The operating temperature of the offgas will be approximately 1,150°C to 1,200°C. The offgas will be discharged directly to the glovebox where the offgas will mix with approximately 13°C nitrogen atmosphere in the LOI glovebox. Thermogravimetric analysis (TGA) is an analytical tool that is similar to LOI, and may be used as an alternative method to determine moisture content of samples (gram quantities) of stabilized plutonium-bearing materials. Existing gloveboxes in the 2736-ZB Building may be configured to accommodate TGA instrumentation supporting moisture determinations related to the aforementioned 3013 Standard requirements (current version in effect at the time of testing). Minor modification activities include removal of unnecessary equipment and purge gas hookup (air, nitrogen, argon). Gaseous effluents from TGA operations will be routed to the existing ventilation system in 2736-BZ Building, which passes through two stages of HEPA filtration before discharge to the environment via the 297-Z-7 stack. Another alternative method (to LOI) for determining the moisture content of the processed material is approved and may be implemented in the future. The method, supercritical fluid extraction (SFE), involves placing representative samples of stabilized material from a batch into porous sample cells in a glovebox. Supercritical carbon dioxide (CO₂, approximately 100°C and 3,000 pounds per square inch) is passed through the sample, solubilizing water in the sample. The solubilized water is carried in the fluid stream to a spectrometer for water detection and quantification. The measured fluid stream, composed of</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>CO2 and water, is released into the glovebox atmosphere. In normal operation, it is expected the SFE effluent would be only CO2. -Stabilization Module. The Stabilization Module consists of the material preparation area, furnace area, and the product fill area. In the material preparation area, canned items containing plutonium-bearing materials can be received, measured for accountability, and placed into a furnace tray (or boat) for insertion into a furnace in the furnace area. The module may also provide a waste pathway to dispose of the waste cans and plastic. In the furnaces, the material in the boats will be heated to greater than 950°Centigrade (C) for at least 2 hours, as specified in U.S. Department of Energy Standard 3013 (DOE-STD-3013, Criteria for Safe Storage of Plutonium Metals and Oxides). The material will be cooled, placed in a convenience can, sampled to verify dryness, and inserted into the Bagless Transfer System (BTS) Module. -BTS Module. In the BTS Module, the filled convenience cans can be received from the Stabilization Module and placed into an inner can. The inner can head space can then be backfilled with helium. A plug will be welded to the inner wall of the container, and the middle of the weld would be cut (maintaining glovebox confinement at all times). -Inner Can Leak Test Module. The Inner Can Leak Test Module will receive an inner welded container [bagless transfer container (BTC)]. Operations in this module will verify the BTC meets or exceeds the leak tightness requirements of DOE Standard 3013. Activities associated with the 296-Z-5 Emission Unit. Activities in 2736-ZB consist of continued operations historically associated with repackaging of special nuclear materials (SNM), shipping and receiving of SNM, non-destructive assay, and office space. The following are activities being conducted under this NOC. -Outer Can Weld Module. The Outer Can Weld Module will receive a leak-checked BTC. The BTC will be placed in an outer container. The outer</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>can head space will then be backfilled with helium, and an outer container lid will be welded onto the container in accordance with the requirements of DOE Standard 3013. -Outer Can Leak Test Module. The Outer Can Leak Test Module will receive an outer welded container (3013 package) and operations in this module will verify that the package meets or exceeds the leak tightness requirements of 3013. -NDA Laboratory Modification Module. The Nondestructive Analysis (NDA) Laboratory will receive the 3013 package and will analyze the 3013 package for isotopic distribution, heat load, and container baseline. Activities associated with the 296-Z-6 Emission Unit. -Vault Modification Module. The secure vault storage locations in the 2736Z Building will be modified to accommodate the 3013 packages. These packages will be sealed, offering no additional potential-to-emit (PTE). No modifications to the existing 2736-Z Building ventilation system, exhausting through minor stack 296-Z-6, will be made. A new chiller will be installed on the 2736Z Building roof to assist in cooling the current supply air temperature. The cooling coil will be placed in the current (exterior) air supply ductwork with no change in the supply air flow rate or route, or in the 296-Z-6 radioactive airborne emissions. Additionally, a vault heating, ventilation, and air conditioning (HVAC) supply isolation damper will be installed on the supply air to minimize unfiltered release of effluent from the building via backflow out the HVAC supply system. Activities associated with the 296-Z-5 and Z-7 Emission Units. -Infrastructure Modification Module. Project W-460 will modify existing infrastructure support systems. Capacities of ventilation systems will be verified and enhanced if necessary. Configuration of the systems will be modified, if necessary, to provide appropriate separation of PFP and process enclosure ventilation. New systems will be installed if no system currently exists,</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>but only if such systems do not effect potential to emit or current control capabilities of the effluent control system. Addition is planned of a new major exhaust stack 296-Z-7 and associated compliant monitoring equipment. Equipment pads for a nitrogen system and a gas bottle storage area will be installed.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Am 241 3.50E+04 Pu 239 1.00E+05 U- 233 1.10E+04</p>	Continuous	<p>CDM: Basis for APQ verified. ZO-160-137 (Operating CM Furnaces in 2736-ZB); LANMAS. Comment:</p>
<p>The 2736-ZB building will exhaust out of the existing 296-Z-5 stack through two stages of individually testable HEPA filters. They will have a minimum efficiency of 99.95% for particulate using a DOP aerosol as defined in ASME N510 or approved equivalent.</p>	Continuous	<p>CDM: HNF-RD-8703, Air Quality--Radioactive Emissions. WHC-SD-CP-OSR-010, Rev. 0-U, PFP Operational Safety Requirements, dated 08/01. Comment:</p>
<p>Functional test differential pressure magnehelic gauges associated with 296-Z-5 HEPA filters annually.</p>	Continuous	<p>CDM: JCS database inquiry; regulatory DPI. Comment:</p>
<p>These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040-(5) and 246-247-060-(5)).</p>	Continuous	<p>CDM: HNF-RD-8703, Air Quality--Radioactive Emissions. Comment:</p>
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph5) (WAC 246-247-080(5)).</p>	Continuous	<p>CDM: DOE/RL 2002-38 for the period 01/01/02 to 06/30/02 and DOE/RL 2003-14 for the period 07/01/02 to 12/31/02. Comment:</p>
<p>The facility shall make available, in timely manner, all documents requested by the department for review. The</p>	Continuous	<p>CDM: WDOH has requested information and records during the past 2 Level II stack inspections, and records promptly were made available. Records are</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).</p>		<p>maintained per administrative procedure AP-IR-5-001. Comment:</p>
<p>The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: No planned pre-operational testing occurred.</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev.4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions." Comment:</p>
<p>The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: Training Records. Comment:</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev.4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions." Comment:</p>
<p>The Department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H. (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: For calculations and input data from stack and ambient air monitors, the ERS electronic system. Information from other than stacks and ambient air monitors resides at the individual facility. For annual reporting, DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).</p>	<p>Continuous</p>	<p>CDM: DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060-(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: WDOH has requested information and records during the past 2 Level II stack inspections, and records promptly were made available. Records are maintained per administrative procedure AP-IR-5-001.</p> <p>Comment:</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator</p>	<p>Continuous</p>	<p>CDM: "Memorandum of Understanding for Initial Point of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001.</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>		
<p>The unabated TEDE to the hypothetical MEI is 2.9E-2 millirem/year from the 296-Z-5 emission unit. The abated TEDE to the hypothetical MEI is 1.5E-5 millirem/year from the 296-Z-5 emission unit (giving abatement credit for one HEPA filter).</p>	<p>Continuous</p>	<p>CDM: DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting, requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

Emission Unit : (200W) P-296Z006-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 390

Page in AOP: 2-152

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Essential drawing (H-2-80167, sht 11) was reviewed. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 banks of 2-stage filters. Abatement credit given for one HEPA.	Continuous	CDM: Essential drawing (H-2-80167, sht 11) was reviewed. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions", (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Plutonium Stabilization and Handling **Permit:** AIR 01-1004 **Date:** 10-08-2001 **NOC ID:** 450
Date In AOP: 06-11-2002 **Date Obsolete:** 12-05-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC	Continuous	CDM: For this approval order, in compliance with all applicable conditions. Comment:

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The total abated emission limit for this Notice of Construction is limited to 4.52E-04 mrem/year to the Maximally Exposed Individual. The total unabated emission limit for this Notice of Construction is limited to 1.67E+03 mrem/year to the Maximally Exposed Individual.</p>	<p>Continuous</p>	<p>CDM: DOE/RL 2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>This process is limited to: stabilizing and/or repackaging plutonium, uranium, oxide, and metal for long term storage in the method described below. Within the 2736Z Building, existing vault storage cubicles may be modified to accommodate larger, long term storage canisters as described below. Activities associated with the 296-Z-7 Emission Unit. Americium, plutonium, and uranium oxides will be stabilized by heating the material in an oven to a temperature of greater than 950°C for a minimum of two hours. In-line monitoring equipment will be provided for determining the moisture/volatile content of the material processed. An alternative method will exist to use thermogravimetric mass spectrometer analysis. The material will be considered thermally stabilized when there is less than 0.5 percent loss on ignition (LOI). Representative samples of 100 percent of the packages will be subjected to LOI testing (glovebox GB-642D). The LOI process will verify dryness and suitability for packaging. The LOI process will heat a sample taken from each material batch. The sample will be weighed and placed into a muffle furnace where the sample will undergo a heating cycle similar to the stabilization process. After the heating cycle is completed, the sample will be weighed again and the beginning and ending weights compared. If the beginning and ending weights differ by less than 0.5 percent, the material will go to final packaging in the BTS Module. If the difference in weights is greater than 0.5 percent, the material will be sent back through the stabilization process until the LOI result is less than 0.5 percent. The furnaces will be heated electrically. The purge gas in</p>	<p>Continuous</p>	<p>CDM: PFP Final Safety Analysis Report (HNF-SD-CP-SAR-021, Rev. 2).</p> <p>Comment: In compliance up to issuance of revisions 2B and 2C.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>the LOI furnace will be nominally 1 scfm of air. The operating temperature of the offgas will be approximately 1,150°C to 1,200°C. The offgas will be discharged directly to the glovebox where the offgas will mix with approximately 13°C nitrogen atmosphere in the LOI glovebox. Thermogravimetric analysis (TGA) is an analytical tool that is similar to LOI, and may be used as an alternative method to determine moisture content of samples (gram quantities) of stabilized plutonium-bearing materials. Existing gloveboxes in the 2736-ZB Building may be configured to accommodate TGA instrumentation supporting moisture determinations related to the aforementioned 3013 Standard requirements (current version in effect at the time of testing). Minor modification activities include removal of unnecessary equipment and purge gas hookup (air, nitrogen, argon). Gaseous effluents from TGA operations will be routed to the existing ventilation system in 2736-BZ Building, which passes through two stages of HEPA filtration before discharge to the environment via the 297-Z-7 stack. Another alternative method (to LOI) for determining the moisture content of the processed material is approved and may be implemented in the future. The method, supercritical fluid extraction (SFE), involves placing representative samples of stabilized material from a batch into porous sample cells in a glovebox. Supercritical carbon dioxide (CO₂, approximately 100°C and 3,000 pounds per square inch) is passed through the sample, solubilizing water in the sample. The solubilized water is carried in the fluid stream to a spectrometer for water detection and quantification. The measured fluid stream, composed of CO₂ and water, is released into the glovebox atmosphere. In normal operation, it is expected the SFE effluent would be only CO₂. -Stabilization Module. The Stabilization Module consists of the material preparation area, furnace area, and the product fill area. In the material preparation area, canned</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>items containing plutonium-bearing materials can be received, measured for accountability, and placed into a furnace tray (or boat) for insertion into a furnace in the furnace area. The module may also provide a waste pathway to dispose of the waste cans and plastic. In the furnaces, the material in the boats will be heated to greater than 950° Centigrade (C) for at least 2 hours, as specified in U.S. Department of Energy Standard 3013 (DOE-STD-3013, Criteria for Safe Storage of Plutonium Metals and Oxides). The material will be cooled, placed in a convenience can, sampled to verify dryness, and inserted into the Bagless Transfer System (BTS) Module.</p> <p>-BTS Module. In the BTS Module, the filled convenience cans can be received from the Stabilization Module and placed into an inner can. The inner can head space can then be backfilled with helium. A plug will be welded to the inner wall of the container, and the middle of the weld would be cut (maintaining glovebox confinement at all times).</p> <p>-Inner Can Leak Test Module. The Inner Can Leak Test Module will receive an inner welded container [bagless transfer container (BTC)]. Operations in this module will verify the BTC meets or exceeds the leak tightness requirements of DOE Standard 3013. Activities associated with the 296-Z-5 Emission Unit. Activities in 2736-ZB consist of continued operations historically associated with repackaging of special nuclear materials (SNM), shipping and receiving of SNM, non-destructive assay, and office space. The following are activities being conducted under this NOC.</p> <p>-Outer Can Weld Module. The Outer Can Weld Module will receive a leak-checked BTC. The BTC will be placed in an outer container. The outer can head space will then be backfilled with helium, and an outer container lid will be welded onto the container in accordance with the requirements of DOE Standard 3013.</p> <p>-Outer Can Leak Test Module. The Outer Can Leak Test Module will receive an outer welded container (3013 package) and operations</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>in this module will verify that the package meets or exceeds the leak tightness requirements of 3013. -NDA Laboratory Modification Module. The Nondestructive Analysis (NDA) Laboratory will receive the 3013 package and will analyze the 3013 package for isotopic distribution, heat load, and container baseline. Activities associated with the 296-Z-6 Emission Unit. -Vault Modification Module. The secure vault storage locations in the 2736Z Building will be modified to accommodate the 3013 packages. These packages will be sealed, offering no additional potential-to-emit (PTE). No modifications to the existing 2736-Z Building ventilation system, exhausting through minor stack 296-Z-6, will be made. A new chiller will be installed on the 2736Z Building roof to assist in cooling the current supply air temperature. The cooling coil will be placed in the current (exterior) air supply ductwork with no change in the supply air flow rate or route, or in the 296-Z-6 radioactive airborne emissions. Additionally, a vault heating, ventilation, and air conditioning (HVAC) supply isolation damper will be installed on the supply air to minimize unfiltered release of effluent from the building via backflow out the HVAC supply system. Activities associated with the 296-Z-5 and Z-7 Emission Units. -Infrastructure Modification Module. Project W-460 will modify existing infrastructure support systems. Capacities of ventilation systems will be verified and enhanced if necessary. Configuration of the systems will be modified, if necessary, to provide appropriate separation of PFP and process enclosure ventilation. New systems will be installed if no system currently exists, but only if such systems do not effect potential to emit or current control capabilities of the effluent control system. Addition is planned of a new major exhaust stack 296-Z-7 and associated compliant monitoring equipment. Equipment pads for a nitrogen system and a gas bottle storage</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
area will be installed.		
The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Am 241 8.05E+04 Pu 239 2.30E+05 U- 233 2.53E+04	Continuous	<p>CDM: Basis verified. ZO-160-137 (Operating CM Furnaces in 2736-ZB); LANMAS.</p> <p>Comment:</p>
An approved modification for the 2736-Z Building is the replacement of the current shelving for new larger units to store the new 3013 compliant cans. The new 3013 cans (considered sealed sources) are approved for long-term storage in the 2736-Z Building. A new chiller will be installed on the 2736-Z Building roof to assist in cooling the current supply air temperature. The cooling coil will be placed in the current (exterior) air supply ductwork with no change in the supply air flow rate or route, or in the 296-Z-6 radioactive airborne emissions. Additionally, a vault HVAC supply isolation damper will be installed on the supply air to prevent unfiltered release of plutonium from the building via backflow out the HVAC supply system.	Continuous	<p>CDM: HNF-SD-CP-SAR-021, Rev. 2 (PFP Final Safety Analysis Report), and drawing H-2-829443/sheet 7.</p> <p>Comment: The chiller was not installed.</p>
All differential pressure magnehelic gauges associated with 296-Z-6 HEPA filters must be functionally tested annually.	Continuous	<p>CDM: JCS database inquiry; regulatory DPI.</p> <p>Comment:</p>
These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040-(5)) and 246-247-060-(5)).	Continuous	<p>CDM: HNF-RD-8703, Air Quality--Radioactive Emissions.</p> <p>Comment:</p>
If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the	Not Applicable	<p>CDM: N/A.</p> <p>Comment: No planned pre-operational testing occurred.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
right to observe such tests (WAC 246-247-060(4)).		
The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).	Continuous	<p>CDM: HNF-EP-0528, Rev. 4: "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).	Continuous	<p>CDM: Training records.</p> <p>Comment:</p>
The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).	Continuous	<p>CDM: HNF-EP-0528, Rev. 4: "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
The department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H. (WAC 246-247-080(2)).	Continuous	<p>CDM: For calculations and input data from stack and ambient air monitors, the ERS electronic system. Information from other than stacks and ambient air monitors resides at the individual facility. For annual</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		<p>reporting, DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).</p>	<p>Continuous</p>	<p>CDM: DOE/RL 2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	<p>Continuous</p>	<p>CDM: DOE/RL 2002-38 for the period 01/01/02 to 06/30/02 and DOE/RL 2003-14 for the period 07/01/02 to 12/31/02.</p> <p>Comment:</p>
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: WDOH has requested information and records during the past 2 Level II stack inspections, and records promptly were made available. Records are maintained per administrative procedure AP-IR-5-001.</p> <p>Comment:</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told</p>	<p>Continuous</p>	<p>CDM: "Memorandum of Understanding for Initial Point of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001.</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>		
<p>The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).</p>	<p>Continuous</p>	<p>CDM: WDOH has requested information and records during the past 2 Level II stack inspections, and records promptly were made available. Records are maintained per administrative procedure AP-IR-5-001.</p> <p>Comment:</p>
<p>The unabated TEDE to the hypothetical MEI is 5.43E-2 millirem/year from the 296-Z-6 emission unit. The abated TEDE to the hypothetical MEI is 2.72E-05 millirem/year from the 296-Z-6 emission unit (giving abatement credit for one HEPA filter).</p>	<p>Continuous</p>	<p>CDM: DOE/RL 2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
the shutdown or completion, to meet any monitoring, record keeping, and reporting, requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6))		

Emission Unit : (200W) P-291S001-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 332

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Sandfilter Required Units: 1 Add'l Description:	Continuous	CDM: Filter is in place and is efficiency tested annually. Comment: Drawings, H-2-825446, H-2-825444 & H-2-8501, and efficiency test procedure 3-V-492.
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: In parallel, only 1 operates at a time	Continuous	CDM: Fans are in place and operates continuously. System operation is verified via RMS. Comment: Visual inspection and drawings, H-2-825446, H-2-825444 & H-2-8501.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 1 week sample / year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Effluent stream is passed through a filter media. Filter is removed and analyzed. Comment: Analytical results are in ABCASH. Samples are taken per procedure BHI-RC-04, Instruction 4.6.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200W) P-296T011-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 61

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: One fan serves both 296-T-11 and 296-T-12	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 stage, last stage 4 in parallel (HEPA's serve both 296-T-11 and 296-T-12)	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.

(No NOC records were found.)

Emission Unit : (200W) P-296T012-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 60

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: One fan serves both 296-T-11 and 296-T-12	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: 2 stage, last stage 4 in parallel (HEPA's serve both 296-T-11 and 296-T-12)	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: N/A. Comment: The ventilation system has been shutdown since Aug 1999.

(No NOC records were found.)

Emission Unit : (200W) P-291T001-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 314

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 3 Add'l Description: 2 in series, 2 parallel (two fans operate while the third fan is a backup)	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Note: This is a minor stack but operated continuously.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Note: This is a minor stack but operated continuously.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Note: This is a minor stack but operated continuously.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: Particulates shall be continuously sampled and analyzed every two-weeks for gross alpha and gross beta, composited on a quarterly basis and analyzed isotopically. Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Periodic confirmatory measurements are done to verify low emissions. Comment: At least 168 hours of cumulative operation are used to provide a representative sample. Note: This is a minor stack but is operated continuously.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (200W) P-296T007-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 315

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Continuous when ACT I and/or ACT II is/are operating.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Continuous when ACT I and/or ACT II is/are operating.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Continuous when ACT I and/or ACT II is/are operating.
Zone or Area: Abatement Technology: Heater Required Units: 1 Add'l Description:	Continuous	CDM: Facility surveillance is a daily plant requirement. Heaters have established set points for operation. Comment: Continuous when ACT I and/or ACT II is/are operating. Note: Heater does not operate when not needed (thermostatically controlled).
Zone or Area: Abatement Technology: Demister Required Units: 1 Add'l Description:	Continuous	CDM: Facility surveillance is a daily plant requirement. Surveillance logsheets document operation during periods of operation. Comment: Continuous when ACT I and/or ACT II is/are operating.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Periodic confirmatory measurements are done to verify low emissions. Comment: At least 168 hours of cumulative operation are used to provide a representative sample.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Secondary Containment and Leak Detection Upgrades to the 2706-T, 2706-TA, and 2706-TB Buildings
Permit: RTAM Date: 06-12-1996 NOC ID: 164 Date In AOP: 07-02-2001 Date Obsolete: 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Approval of T Plant secondary and leak detection upgrades to allow increased decontamination activities within the 2706-T building, and to initiate decon activities in the 2706-TA building and construct the 2706-TB holding tanks.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

Emission Unit : (200W) P-291U001-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 310

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
<p>Zone or Area:</p> <p>Abatement Technology: Fan</p> <p>Required Units: 2</p> <p>Add'l Description: In parallel</p>	Continuous	<p>CDM: Fans are in place and operates continuously.</p> <p>Comment: Visual inspection and drawings H-2-825451 and H-2-827361. System operation is verified via RMS.</p>
<p>Zone or Area:</p> <p>Abatement Technology: Sandfilter</p> <p>Required Units: 1</p> <p>Add'l Description:</p>	Continuous	<p>CDM: Filter is in place and is efficiency tested annually.</p> <p>Comment: Drawings H-2-825451 and H-2-827361, and efficiency test rocedure 3-V-492.</p>
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
<p>Required Sampling: Record Sample</p> <p>Sampling Frequency: 1 week sample / year</p> <p>Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA</p>	Continuous	<p>CDM: Effluent stream is passed through a filter media. Filter is removed and analyzed.</p> <p>Comment: Analytical results are in ABCASH. Samples are taken per procedure BHI-RC-04, Instruction 4.6.</p>
<p>Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3]</p> <p>Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)</p>	Continuous	<p>CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory.</p> <p>Comment:</p>

(No NOC records were found.)

Emission Unit : (200W) P-213W-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 308

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: Non operational Add'l Description: This unit is inactive and will require an NOC to resume operation or a report of closure to deregister.	Continuous	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1, - December 31, 2002.
Zone or Area: Abatement Technology: HEPA Required Units: Non operational Add'l Description: This unit is inactive and will require an NOC to resume operation or a report of closure to deregister.	Continuous	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1, - December 31, 2002.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: CH2M HILL Quality Assurance Program. Comment: The emission unit did not operate during the period of January 1 - December 31, 2002.

(No NOC records were found.)

Emission Unit : (300) EP-305B-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 197

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured with 2 HEPA filters in series.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: Continuous Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed all required samples were collected during the reporting period, including the start and end dates of sample periods.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

NOC: Modification, Rev 0 **Permit:** AIR 95-811 **Date:** 08-25-1995 **NOC ID:** 105
Date In AOP: 07-02-2001 **Date Obsolete:** 12-03-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Potential-to-emit abated (total effective dose equivalent to the maximally exposed individual) 3.0 E-04 mrem/yr	Not Applicable	CDM: N/A. Comment: The potential-to-emit (abated) for this emission unit was superceded by the WDOH permit approval AIR 98-1007. (NOC superceded 12/3/02 by AIR 02-1202)
Control Technology 1 - high efficiency particulate air filter, 1 - fan	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured with 2 HEPA filters, in series, and 1 fan. (NOC superceded 12/3/02 by AIR 02-1202)

WDOH Conditions	Comp. Status	Compliance Determination Method
Stack measurement - Periodic confirmatory measurements - 2 week sample/year	Not Applicable	CDM: N/A. Comment: The sampling frequency for this emission unit was superseded by the WDOH permit approval AIR 98-1007. (NOC supercede 12/3/02 by AIR 02-1202)

NOC: Modification, Rev 1 **Permit:** AIR 98-1007 **Date:** 10-08-1998 **NOC ID:** 319
Date In AOP: 07-02-2001 **Date Obsolete:** 12-03-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license.	Intermittent	CDM: Compliance review of approval conditions. Comment: For this reporting period, one condition of this license (AIR 98-1007) is reported as intermittent compliance (Refer to other condition in this approval order for specific details). (NOC superceded 12/3/02 by AIR 02-1202)
This approval, with its conditions and limitations, constitutes an amendment to the Department's Radioactive Air Emissions License. This amendment must be included in the next revision of the Hanford Air Operating Permit.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. (NOC superceded 12/3/02 by AIR 02-1202)
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in the NOC or during operation it reserves the right to require modifications to bring it into compliance.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. (NOC superceded 12/3/02 by AIR 02-1202)
U.S. DOE shall monitor this project or emission unit as follows: Continuous	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A review of this data (that includes the sample results) was used to verify compliance. (NOC superceded 12/3/02 by AIR 02-1202)
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be

WDOH Conditions	Comp. Status	Compliance Determination Method
for such testing.		completed in the future, or that pertain to actions required of the agency. (NOC superceded 12/3/02 by AIR 02-1202)
<p>The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures.</p>	Continuous	<p>CDM: Personnel interview.</p> <p>Comment: Use and Maintenance: RCTs are responsible for the collection of samples and operating monitoring equipment. These personnel are trained to procedures (located on the EM web page for these activities). Evidence of training to these procedures is maintained with the Laboratory Training group. Air Balance personnel are responsible for the efficiency testing and replacement of HEPA filters. This testing is performed in accordance with Air Balance procedures located on the F&O web page. Evidence of training to these procedures is maintained with the Laboratory Training group. Emergency Response: The Emergency Preparedness group trains the building emergency directors (BEDs) via PNNL courses 402, 403, and 404. Under each BED is a response organization (BERO); these personnel are trained under course 405. Training records are maintained with Laboratory Training. Emergency preparedness exercises are conducted on a scheduled basis to evaluate performance. Evaluations are maintained with the EP group. (NOC superceded 12/3/02 by AIR 02-1202)</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)).</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Data collected through support organizations are coordinated through SOWs that outline project expectations for collection and reporting of data: Airborne Radionuclide Emission Sample Analysis Statement of Work (sample analysis), Airborne Radionuclide Emission Sampler and Monitor Operations Statement of Work (collection of samples, daily inspections, and delivery to laboratory), Effluent Sampling and Monitoring Support-Memorandum of Agreement (performance of stack flow measurements and maintenance of equipment)and Memorandum of Agreement for Calibration Services (calibration of rotameters and vacuum gauges). Note: All of these documents are maintained on the EM web page. (NOC superceded 12/3/02 by AIR 02-1202)</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: PNNL's Rad Air monitoring program is conducted under the EM Quality Assurance Plan, EM-QA-01. This plan is based on the requirements of</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		40 CFR 61, Appendix B, Method 114. (NOC superceded 12/3/02 by AIR 02-1202)
<p>The department reserves the right to inspect and audit this unit during operation and operation including all activities, equipment, operation procedures, documents, data, and other records related to compliance with the regulations.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. (NOC superceded 12/3/02 by AIR 02-1202)</p>
<p>The department may require an ALARACT demonstration at any time.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. (NOC superceded 12/3/02 by AIR 02-1202)</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H.</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Retention period for Rad Air records is specified as part of the EM Quality Assurance Plan, EM-QA-01. Retention periods are further documented in the EM project files under RIDS. (NOC superceded 12/3/02 by AIR 02-1202)</p>
<p>All measured or calculated emissions must be reported annually.</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Abated emissions are included in DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that emissions data previously submitted by PNNL were included in the report. (NOC superceded 12/3/02 by AIR 02-1202)</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. (Note: Applicable standards(WAC 246-247-040)include unit specific emission limits (paragraph 5), the offsite dose standard(paragraph</p>	<p>Not Applicable</p>	<p>CDM: Records review.</p> <p>Comment: There were no incidents that required notification to the WDOH during the reporting period. (NOC superceded 12/3/02 by AIR 02-1202)</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
1), BARCT (paragraph 3) or ALARACT (paragraph 4), or any limitations included in this approval(paragraph 5)).		
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, including whether or not any potential for airborne release occur.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. (NOC superseded 12/3/02 by AIR 02-1202)</p>
The facility must maintain a log in an approved format for this activity or emission unit.	Intermittent	<p>CDM: Records review.</p> <p>Comment: The Waste Operations organization within PNNL uses the Integrated Waste Management System (database) to track containers of waste that are generated within PNNL. This database captures drum numbers and locations, form (liquid/solid), as well as information on the radiological content (pCi/g) and weight of the containers. Interim compliance was determined because the use of the database was not formally 'approved' by WDOH. Approval has been obtained from J. Schmidt (WDOH, 05-01-02) for the method used to meet this condition. (NOC superseded 12/3/02 by AIR 02-1202)</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years.	Continuous	<p>CDM: Operational procedure.</p> <p>Comment: Retention period for Rad Air records is specified as part of the EM Quality Assurance Plan, EM-QA-01. Retention periods are further documented in the EM project files under RIDS. (NOC superseded 12/3/02 by AIR 02-1202)</p>
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections. At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.	Continuous	<p>CDM: Records review.</p> <p>Comment: Implementation of the "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspection", dated July 2001. The MOU defines, at a site-wide level, the roles and responsibilities for regulator access to the Hanford Site. SBMS subject area "External Regulatory Inspections (ES&H)" further defines the roles and responsibilities at a contractor level for hosting, conducting, and documenting external regulatory inspections. (NOC superseded 12/3/02 by AIR 02-1202)</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The facility shall make requested documents available in a timely manner for review.	Not Applicable	CDM: N/A. Comment: WDOH did not request any records for this emission unit during the reporting period. (NOC superseded 12/3/02 by AIR 02-1202)
The process is limited to the exact description described in the NOC.	Continuous	CDM: Personnel interview. Comment: Verified, with Rad Waste Operations on 04/22/03, that the activities performed within 305B were consistent with those contained in the Permit. (NOC superseded 12/3/02 by AIR 02-1202)
The required controls are: HEPA Filters (Two) Fume Hood and Room Exhaust.	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described. (NOC superseded 12/3/02 by AIR 02-1202)
The radionuclides re limited to: As listed in the NOC Letter # 98-EAP-455	Continuous	CDM: Records review. Comment: On 9-17-2002 a NOC revision was approved modifying this condition. Staging of radioactive waste was moved from 305B to 325 Building during 2001. 305B no longer stores radioactive waste. (NOC superseded 12/3/02 by AIR 02-1202)
The annual possession quantity is limited to: NOC Letter # 98-EAP-455	Continuous	CDM: Records review. Comment: Staging of radioactive waste was moved from 305B to the 325 Building during 2001. 305B no longer stores radioactive waste. (NOC superseded 12/3/02 by AIR 02-1202)
The abated emission limit is 1.56E-05 mrem/yr to the MEI.	Continuous	CDM: Records review. Comment: The "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002", DOE/RL-2003-19, was reviewed to verify the emissions from 305B were below the NOC limits. (NOC superseded 12/3/02 by AIR 02-1202)

NOC: Clarification to condition in AIR 98-1007 **Permit:** RTAM **Date:** 09-17-2002 **NOC ID:** 0
Date In AOP: 09-17-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Clarification to AIR 98-1007 condition that states that radionuclides are limited to "as listed in NOC letter #98-EAP-455":	Continuous	CDM: Records Review / Personnel Interview Comment: Staging of radioactive waste was moved from 305B to the 325 Building during 2001. 305B no longer stores

WDOH Conditions	Comp. Status	Compliance Determination Method
The radionuclides of concern, as listed in the NOC letter #98-EAP-455, exist as particulates. All radionuclides are assumed to be either americium-241 for alpha activity or cesium-137 for beta activity. This assumption provides a conservative estimate of the potential to emit from the emission unit. In addition to the radionuclides of concern listed in the NOC, essentially any radionuclide isotope could be encountered.		radioactive waste. (NOC condition superceded 12/3/2002 by AIR 02-1202)

Emission Unit : (300) EP-306W-03-V

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 348

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In Series	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed that all required samples were collected during the reporting period, including the start and end dates of sample periods.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

NOC: X-Ray and Low Level Waste Repackaging Permit: Shortform Approval Date: 08-04-1997
NOC ID: 233 Date In AOP: 07-02-2001 Date Obsolete: 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The exhaust air from the building will be HEPA filtered	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured with two HEPA filters, in series, and one fan.
Perform periodic monitoring	Continuous	CDM: Records review. Comment: Emission data are maintained in the Gaseous GED. A query of the database confirmed that all required samples were collected during the reporting period, including the start and end dates of sample periods.

Emission Unit : (300) P-309PRTR-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 195

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Intermittent operation	Continuous	CDM: As-built drawing, H-3-11062. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing, H-3-11062. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Smear Survey Sampling Frequency: 1 per year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Operational procedure, FS-NOP-16-007. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Plutonium Recycle Test Reactor Decontamination and Stabilization Activities, Rev 0 Permit: Shortform Approval Date: 08-18-1998 NOC ID: 291 Date In AOP: 07-02-2001 Date Obsolete: 04-18-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Emissions shall be exhausted through the 309-PR-TR stack having a single stage of HEPA filtration with a minimum efficiency of 99.95 percent for 0.3 micron diameter particles.	Intermittent	CDM: Filter testing/operational procedure FS-NOP-16-007. Comment: The AOP condition states a standard for manufacturers' testing of HEPA filters. Current in-field annual testing of HEPA filters meets the intent of the AOP condition. Compliance is continuous for poly-dispersal droplet testing, the appropriate standard, but intermittent for the condition as written in the AOP.
Monitor emission using the existing 309-PR-TR stack sampling system.	Continuous	CDM: Smear sampling/operational procedure, FS-NOP-16-007. Comment:

NOC: Plutonium Recycle Test Reactor Decontamination and Stabilization Activities, Rev 0A Permit: NRA Date: 09-08-1999 NOC ID: 391 Date In AOP: 07-02-2001 Date Obsolete: 04-18-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
WDOH Conditions and Limitations dated 8/18/98 (Shortform approval) are applicable. There are no new WDOH conditions that apply to this NOC.	Not Applicable	CDM: N/A. Comment: No new requirements or conditions to be met.

Emission Unit : (300) EP-318-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 175

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(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Intermittent	CDM: Records review. Comment: Failed to obtain the required annual periodic confirmatory 2-week sample. Appendix D calculation will be reported in place of sampling. Notification regarding the missed sampling was reported to WDOH on January 9, 2003 and was reported as a deviation in Air Operating Permit Semi Annual Report for the Period July 1, 2002 through December 30, 2002 (DOE/RL-2003-1).

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan (EM-QA-01) specifies quality assurance requirements.

NOC: Removal of HEPA Filtration **Permit:** RTAM **Date:** 12-07-1995 **NOC ID:** 131
Date In AOP: 07-02-2001

No WDOH Conditions for this NOC.

NOC: Stack Relocation **Permit:** Shortform Approval **Date:** 01-06-1998 **NOC ID:** 251
Date In AOP: 07-02-2001 **Date Obsolete:** 12-23-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
There are no stack controls on the building exhaust	Continuous	CDM: Personnel interview. Comment: Facility personnel were contacted to discuss future plans to install a HEPA filter to provide emission controls to support a change in work scope.
Periodic confirmatory measurement = 2 week sample/year	Intermittent	CDM: Records review. Comment: Emission data are maintained in the GED. Failed to obtain the required annual periodic confirmatory 2-week sample. Appendix D calculation will be reported in place of sampling.
Unabated dose is 3.74E-07 mrem/year	Continuous	CDM: Records review. Comment: PNNL performs an annual assessment of radiological inventory to meet NESHAPS requirements. This process is conducted in accordance with PNL-10855, "Assessment of Unabated Facility Emission Potential for Evaluating Airborne Radionuclide Monitoring Requirements at Pacific Northwest National Laboratory - 2001." The potential unabated emissions for this unit were less than permit approvals.
Abated dose is 3.74E-07 mrem/year	Continuous	CDM: Records review. Comment: Abated emissions are included in DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." The report was reviewed to verify that emissions were below the NOC limits.

WDOH Conditions	Comp. Status	Compliance Determination Method
Annual possession quantity of radionuclides: inventory unchanged and in project files	Intermittent	CDM: Records review. Comment: Review of the 2002 NESHAPS radionuclide inventory assessment. Eu-154, Eu-155, Sb-125, and Y-88 are listed on this inventory, but are not included in the approved APQ for the facility.

Emission Unit : (300) EP-320-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 358

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 3 Add'l Description: Before 5/21/02: 2 In parallel, 1 backup	Intermittent	CDM: Personnel interview/record review. Comment: Condition reported as "Intermittent" compliance since the Abatement Control Technology previously described in the AOP was incorrect. An Administrative Amendment to the AOP signed May 21, 2002, corrected the required number of units (2 units, [1 operational, 1 backup]). The Building Engineer confirmed the radiological exhaust system is configured with 2 fans, one operational, one backup.
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 5/21/02 and later: 1 operational, 1 backup	Continuous	CDM: Personnel interview/record review. Comment: AOP signed May 21, 2002, corrected the required number of units (2 units, 1 operational, 1 backup). The Building Engineer, MD Hughes, confirmed the radiological exhaust system is configured with 2 fans, one operational, one backup.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed that all required samples were collected during the reporting period, including the start and end dates of sample periods.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-320-02-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 355

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed that all required samples were collected during the reporting period, including the start and end dates of sample periods.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-320-03-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 356

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed that all required samples were collected during the reporting period, including the start and end dates of sample periods.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-320-04-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 357

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirms that all required samples were collected during the reporting period, including the start and end dates of sample periods.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-323-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 359

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Equipment Room Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described.
Zone or Area: Hot Cell Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Common to both areas	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed that all required samples were collected during the reporting period, including the start and end dates of sample periods.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-326-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 362

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Hot cells and hoods Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview / records review. Comment: Drawing H-3-70235, sheet 1 of 3 indicates all hot cells and hoods exhaust through HEPA filters before exhausting through the emission point. Verified the radiological exhaust system with the Building Engineer.
Zone or Area: Hoods, SEM Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: Fan Required Units: 3 Add'l Description: In parallel, common to both areas	Continuous	CDM: Records review / personnel interview. Comment: Drawing H-3-70235 indicates the facility is serviced by three exhaust fans (EF-1, EF-2, and EF-3) before exhausting through the emission point. Verified the radiological exhaust system with the Building Engineer.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed all required samples were collected during the reporting period, including the start and end dates of sample periods.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-327-02-V

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 408

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: Serves compactor area.	Continuous	CDM: System drawings, review of facility surveillance records, and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: System drawings, review of facility surveillance records, and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: System drawings, review of facility surveillance records, and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sampling Sampling Frequency: One 4-week sample per year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Review of facility surveillance records and specified procedure HNF-3444, "324/327 Facilities Environmental Effluent Specifications." Inquiry with Cognizant Engineer. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) &	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)		the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (300) EP-329-01-S Chemical Sciences Laboratory

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 366

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: 2 in parallel, 1 Standby (3 total)	Continuous	CDM: Records review / Personnel interview Comment: Drawing H-3-70275, Sheet 1 of 2, shows the facility is serviced by fans HVE-1-F, HVE-2-F, and HVE-3-F. Verified radiological exhaust system with the Building Engineer.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series, (System includes up to 5 banks of 2 stages of HEPA filters in series, minimum of 1 bank of 2 testable filters in use)	Continuous	CDM: Records review / Personnel interview Comment: Drawing H-3-70275, Sheet 1 of 2, shows the facility is serviced by five separate banks of filters (with each bank including a pre-filter, primary, and secondary HEPA filters). Verified radiological exhaust system with the Building Engineer.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirms all required samples were collected during the reporting period, including the start and end dates of sample periods.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

NOC: Research at the 329 Facility **Permit:** AIR 01-1006 **Date:** 10-09-2001 **NOC ID:** 494
Date In AOP: 06-11-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).</p>	<p>Intermittent</p>	<p>CDM: Compliance review of approval conditions.</p> <p>Comment: For this reporting period, two conditions of this license (AIR 01-1006) are reported as intermittent compliance. Refer to other conditions in this approval order for specific details.</p>
<p>The total abated emission limit for this Notice of Construction is limited to 9.40E-05 mrem/year to the Maximally Exposed Individual. The total unabated emission limit for this Notice of Construction is limited to 8.00E-03 mrem/year to the Maximally Exposed Individual.</p>	<p>Intermittent</p>	<p>CDM: Records review.</p> <p>Comment: The "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002", DOE/RL-2003-19, was reviewed to verify the abated emissions for the 329 Building were below the NOC limits. The NESHAPS inventory of radioactive materials is conducted for PNNL facilities on an annual basis in accordance with PNL-10855, "Assessment of Unabated Facility Emission Potentials for Evaluating Airborne Radionuclide Monitoring Requirement at PNNL-2001." This assessment indicates the unabated emissions for the 329 Building were 3.33E-02 mrem/year.</p>
<p>This process is limited to: laboratory processes conducted in the 329 facility. The processes allowed to be conducted in the 329 Facility are outlined below. Current Laboratory Processes Research activities currently in the 329 Building are conducted in support of the Hanford environmental mission and other key DOE missions of national and international importance. Research activities are performed on both radioactive and non-radioactive samples. The following research processes are allowed in the 329 Building: Development of special purpose radiation detection and sampling systems, Development of electronics and software to enhance gamma and neutron detector performance, Gamma detection equipment is used for radioisotope quantification that may involve chemical separations, Solid, liquid, and gas samples (both radioactive and non-radioactive) are analyzed in specialized laboratories, Wet chemistry techniques and the operation of specialized analytical instrumentation such as mass spectrometers, organic mass spectrometers, and the inductively</p>	<p>Continuous</p>	<p>CDM: Records review / personnel interview.</p> <p>Comment: Verified with Operations Manager. Under the PNNL Standards Based Management System (SBMS) each new research project is required to be reviewed via the Electronic Proposal & Risk assessment process. The reviews are recorded in the EPR database. Facility changes are required to be reviewed via the SBMS Subject Area for "Engineering Calculations, Drawings and Specifications creating and Modifying." Projects with potential air emissions are reviewed by Effluent Management under the SBMS Airborne Emission Subject Area.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>coupled plasma spectrometers, Separations and analyses of radionuclides, Preparation of radioactive standards (solid, liquid, and gas). Argon Project It is allowed to fabricate and develop gas ionization detectors testing against known quantities of argon gas for comparisons against modeling simulations. The gas ionization detectors will be set up inside a hood in the 329 Facility that exhausts through emission point EP-329-01-S. An argon gas mixture will be connected to the detection system. The argon would be vented from the test apparatus, through the hood, and finally through the building's main stack. The radionuclides that will be utilized in these studies are Ar-37, Ar-39, and Ar-41.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Ac 227 3.85E-05 Ag 110 m 3.00E-05 Al 26 5.00E-04 Am 241 2.10E-02 Am 243 2.31E-05 Ar 37 6.00E-05 Ar 39 6.00E-07 Ar 41 6.00E-05 Au 195 5.00E-04 Ba 133 8.00E-04 Bi 207 1.00E-03 C- 14 2.00E-03 Cd 109 1.08E-05 Ce 144 2.00E-04 Cf 252 7.00E-05 Cl 36 6.01E-04 Cm 243 1.00E-04 Cm 244 9.90E-04 Co 57 4.00E-01 Co 60 2.20E-05 Cs 134 6.20E-03 Cs 137 2.20E-03 Eu 152 4.00E-03 Eu 154 1.00E-03 Eu 155 9.00E-04 Fe 55 1.00E+01 Fe 59 5.00E-02 H- 3 2.00E-01 I- 125 5.00E-04 I- 129 3.00E-06 I- 131 2.00E-05 Ir 192 1.00E-03 Kr 85 m 5.00E-03 Mn 54 4.00E-03 Na 22 8.00E-03 Nb 93 m 8.06E+00 Nb 94 1.00E-05 Nb 95 5.20E-03 Ni 59 3.00E+02 Ni 63 2.00E-03 Np 235 5.00E-04 Np 237 1.37E-03 Np 239 5.00E-01 P- 32 5.00E-02 Pb 210 1.16E-06 Pb 212 5.00E-02 Pm 147 1.00E-03 Pu 236 3.00E-07 Pu 238 5.20E-07 Pu 239 8.77E-07 Pu 241 1.00E-05 Pu 242 6.58E-08 Pu 244 8.00E-08 Ra 224 1.00E-03 Ra 226 2.00E-05 Ra 228 4.00E-06 Rn 222 5.00E-03 Ru 106 6.00E-05 Sb 125 1.08E-03 Sc 46 5.00E-03 Se 75 5.00E-04 Sm 151 5.00E+01 Sr 85 5.00E-04 Sr 90</p>	<p>Intermittent</p>	<p>CDM: Records review.</p> <p>Comment: The 2002 NESHAPS Radionuclide Inventory was reviewed. The following radionuclides exceeded the APQ listed in the approval condition: Co-60, Cs-137, Pu-238, Pu-239, and Sr-90. The following radionuclides were found in inventory but were not in the NOC: Ce-141, Co-58, Cr-51, Hg-203, Pa-231, Pu-240, Ru-103, Sn-113, Ta-182, Te-123m, Te-125m, U-236, Y-88. A new NOC is being prepared with an expanded APQ list.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>1.53E-02 Tc 95 m 5.00E-04 Tc 97 8.00E-05 Tc 99 2.00E-03 Th 228 2.00E-07 Th 229 1.16E-06 Th 230 2.20E-05 Th 232 1.86E-03 TI 204 5.00E-04 Tm 171 5.00E-04 U- 232 2.40E-05 U- 233 1.75E-06 U- 234 4.00E-07 U- 235 6.50E-05 U- 238 1.66E-02 Xe 131 m 3.00E-03 Xe 133 2.00E-05 Xe 133 m 2.00E-05 Xe 135 1.00E-05 Zn 65 8.00E-04 Zr 95 5.00E+01</p>		
<p>These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040(5)) and 246-247-060(5)).</p>	<p>Continuous</p>	<p>CDM: Records review. Comment: Compliance to this condition is demonstrated through the implementation of PNNL's Laboratory Policies and Standards (http://sbms.pnl.gov/common/c100d010.htm) and the documents referenced in the Annual Air Operating Permit Compliance self assessment maintained in the Effluent Management Project Record file.</p>
<p>If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060-(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: Not applicable. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM: Not applicable. Comment: No planned pre-operational testing occurred during reporting period.</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).</p>	<p>Continuous</p>	<p>CDM: Records review. Comment: PNNL's Rad Air monitoring program is conducted under the Effluent Management Quality Assurance Plan EM-QA-01. This plan is based on the requirements of 40 CFR 61, Appendix B, Method 114.</p>
<p>The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).</p>	<p>Not Applicable</p>	<p>CDM: Not applicable. Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		required of the agency.
<p>The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).</p>	Continuous	<p>CDM: Personnel interview / records review.</p> <p>Comment: Use and Maintenance: RCTs are responsible for the collection of samples and operating monitoring equipment. These personnel are trained to procedures (located on the Effluent Management web page) for these activities. Evidence of training to these procedures is maintained with the Laboratory Training group. Air Balance personnel are responsible for the efficiency testing and replacement of HEPA filters. This testing is performed in accordance with Air Balance procedures located on the F&O web page. Evidence of training to these procedures is maintained with the Laboratory Training group. Emergency Response: The Emergency Preparedness group trains the building emergency directors (BEDs) via PNNL courses 402, 403, and 404. Under each BED is a response organization (BERO), these personnel are trained under course 405. Training records are maintained with Laboratory Training. Emergency preparedness exercises are conducted on a scheduled basis to evaluate performance. Evaluations are maintained with the EP group.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).</p>	Continuous	<p>CDM: Records review.</p> <p>Comment: Data collected through support organizations are coordinated through SOWs that outline project expectations for collection and reporting of data: Airborne Radionuclide Emission Sample Analysis Statement of Work (Sample analysis), Airborne Radionuclide Emission Sampler and Monitor Operations Statement of Work (Collection of samples, daily inspections, and delivery to laboratory), Effluent Sampling and Monitoring Support-Memorandum of Agreement (performance of stack flow measurements and maintenance of equipment), Memorandum of Agreement for Calibration Services (Calibration of rotameters and vacuum gauges). Note: All of these documents are maintained on the EM web page.</p>
<p>The department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).</p>	Not Applicable	<p>CDM: Not applicable.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: Not applicable.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must meet all reporting and record keeping requirements of 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Retention period for Rad Air records is specified as part of the Effluent Management Quality Assurance Plan, EM-QA-01. Retention periods are further documented in the EM project files under the Records Inventory and Disposal Schedule (RIDS).</p>
<p>The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: Abated emissions are included in DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that emissions data previously submitted by PNNL was included in the report.</p>
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	<p>Not Applicable</p>	<p>CDM: Records review.</p> <p>Comment: No reports were required.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown, and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission</p>	<p>Not Applicable</p>	<p>CDM: Not applicable.</p> <p>Comment: Ecology and Health have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the shutdown or completion, to meet any monitoring, record keeping, and reporting requirements, no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6))</p>		
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: Operational procedure. Comment: Retention period is specified in the Effluent Management Quality Assurance Plan (EM-QA-01) and also identified in the EM Records Inventory and Disposal Schedule (RIDS).</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>	<p>Continuous</p>	<p>CDM: Records Review. Comment: Implementation of the "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspection", dated July 2001. The MOU defines, at a site-wide level, the roles and responsibilities for regulator access to the Hanford Site. SBMS subject area "External Regulatory Inspections (ES&H)" further defines the roles and responsibilities at a contractor level for hosting, conducting, and documenting external regulatory inspections.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).	Not Applicable	CDM: Not applicable. Comment: WDOH did not request any records for this emission unit during the reporting period.

Emission Unit : (300) EP-331G-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 342

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(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Registration of Existing Stacks Permit: RTAM Date: 01-16-1998 NOC ID: 252
Date In AOP: 07-02-2001 Date Obsolete: 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
A single stage HEPA filter is installed at each stack	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described. (NOC superseded by AIR 02-1217, 12/12/2002)
Radionuclides of concern include 14C, 3H, 32P, and 35S (radioactive tracers).	Continuous	CDM: Records review. Comment: The facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its "periodic" use in the April 25,2000 RTAM. (NOC superseded by AIR 02-1217, 12/12/2002)
Annual emissions estimates are based on engineering calculations; no monitoring because quantity too small to detect	Not Applicable	CDM: Not applicable. Comment: Emission unit inactive during the reported compliance period. (NOC superseded by AIR 02-1217, 12/12/2002)
Unabated dose is 1.90E-08 mrem/year	Continuous	CDM: Records review. Comment: The facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its "periodic" use in the April

WDOH Conditions	Comp. Status	Compliance Determination Method
		25,2000 RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)
Abated dose is 1.90E-10 mrem/year	Continuous	CDM: Records review. Comment: The facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its "periodic" use in the April 25,2000 RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)
Annual possession quantity limited to: Total 4.25E-03 Ci	Continuous	CDM: Records review. Comment: This facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its 'periodic' use in the April 25, 2000, RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)

Emission Unit : (300) EP-331G-02-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 343

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(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Registration of Existing Stacks **Permit:** RTAM **Date:** 01-16-1998 **NOC ID:** 252

Date In AOP: 07-02-2001 **Date Obsolete:** 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
A single stage HEPA filter is installed at each stack	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed the radiological exhaust system is configured as described. (NOC superceded by AIR 02-1217, 12/12/2002)
Radionuclides of concern include 14C, 3H, 32P, and 35S (radioactive tracers).	Continuous	CDM: Records review. Comment: This facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its 'periodic' use in the April 25, 2000, RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)

WDOH Conditions	Comp. Status	Compliance Determination Method
Annual emissions estimates are based on engineering calculations; no monitoring because quantity too small to detect	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Emission unit inactive during the reported compliance period. (NOC superceded by AIR 02-1217, 12/12/2002)</p>
Unabated dose is 1.90E-08 mrem/year	Continuous	<p>CDM: Records review.</p> <p>Comment: This facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its 'periodic' use in the April 25, 2000, RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)</p>
Abated dose is 1.90E-10 mrem/year	Continuous	<p>CDM: Records review.</p> <p>Comment: This facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its 'periodic' use in the April 25, 2000, RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)</p>
Annual possession quantity limited to: Total 4.25E-03 Ci	Continuous	<p>CDM: Records review.</p> <p>Comment: This facility was not in use during the reporting period, and there were no dispersible radiological material in the facility. This facility has been in this condition since WDOH was notified of its 'periodic' use in the April 25, 2000, RTAM. (NOC superceded by AIR 02-1217, 12/12/2002)</p>

Emission Unit : (300) EP-331-02-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 509

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(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Portable Radon Research Facility Permit: AIR 96-506 Date: 05-15-1996 NOC ID: 158
Date In AOP: 07-02-2001 Date Obsolete: 12-30-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The potential to emit from the Radon Generating Facility must not, when added to another source term, affect the NESHAPS status of the emission unit without writing a new NOC to DOH and to the EPA	Continuous	CDM: Personnel interview. Comment: The portable radon generator has been in a 'moth-balled' condition (equipment still in crates) since moved from the LSL-II facility. The equipment was never brought on-line in any of the PNNL facilities. Verified with Building Manager. (A Notice of Closure for this facility was submitted to WDOH and approved on 12/30/02)
All controls, or equivalent, committed to in the original NOC are require. If changes are planned, approval must be sought from DOH	Not Applicable	CDM: N/A. Comment: Emission unit inactive during the reported compliance period. (A Notice of Closure for this facility was submitted to WDOH and approved on 12/30/02)

NOC: Radon Research Facility Permit: AIR 95-803 Date: 08-08-1995 NOC ID: 95
Date In AOP: 07-02-2001 Date Obsolete: 12-30-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Process description: This project primarily focuses on radon exposures of animals and addresses the major biologic effects and factors influencing risks of indoor radon exposures. Both invitro and invivo experiments are performed using laboratory animals and cell lines. The radon generator contains approximately 1 Ci of a radium chloride solution which will generate up to 130 uCi/minute of Rn-222. The radon is routed directly to HEPA filters and charcoal columns of the radon-holdup system. Exhaust from the radon holdup system is routed to the building exhaust that is HEPA filtered.	Not Applicable	CDM: N/A. Comment: Emission unit inactive during the reported compliance period. (A Notice of Closure for this facility was submitted to WDOH and approved on 12/30/02)
Control Technology: 2 - high efficiency particulate air filters (2 in series); 3 fans (2 in parallel, 1 backup); Additional controls: in-line HEPA, dehumidifier, and charcoal beds	Not Applicable	CDM: N/A. Comment: Emission unit inactive during the reported compliance period. (A Notice of Closure for this facility was submitted to WDOH and approved on 12/30/02)
Stack measurement: Continuous measurement. Additional measurement: Radon	Not Applicable	CDM: N/A.

WDOH Conditions	Comp. Status	Compliance Determination Method
		Comment: Emission unit inactive during the reported compliance period. (A Notice of Closure for this facility was submitted to WDOH and approved on 12/30/02)
Potential-to-emit abated (total effective dose equivalent to the maximally exposed individual): 7.0 E-03 mrem/yr.	Not Applicable	CDM: N/A. Comment: Emission unit inactive during the reported compliance period. (A Notice of Closure for this facility was submitted to WDOH and approved on 12/30/02)

Emission Unit : (300) P-340DECON-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 422

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Moisture separator Required Units: 1 Add'l Description: Serves the decon sump	Continuous	CDM: As-built drawings Comment: H-3-34188
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawings Comment: H-3-34188
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series, both HEPA filters are tested as a single unit	Continuous	CDM: As-built drawings Comment: H-3-34188
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 3 in parallel, Change Room doesn't pass through prefilter	Continuous	CDM: As-built drawings Comment: H-3-34188.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 weeks/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (300) P-340BBLDG-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 424

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Fan operates intermittently	Not Applicable	CDM: N/A. Comment: The stack did not operate during the reporting period.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description: 2parallel (minimum of 1 active flow paths providing 1 stage of HEPA filtration)	Not Applicable	CDM: N/A. Comment: The stack did not operate during the reporting period.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: In parallel (minimum of 1 active flow paths providing 1 stage of HEPA filtration)	Not Applicable	CDM: N/A. Comment: The stack did not operate during the reporting period.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 weeks/year (inactive) Radionuclide Requiring Measurement: monitoring not currently performed	Not Applicable	CDM: N/A. Comment: The stack did not operate during the reporting period.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(I) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Not Applicable	CDM: N/A. Comment: The stack did not operate during the reporting period.

(No NOC records were found.)

Emission Unit : (300) EP-3730-01-S

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 417

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In series	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Emission data are maintained in the GED. A query of the database confirmed all required samples were collected during the reporting period, including the start and end dates of sample periods.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

(No NOC records were found.)

Emission Unit : (300) EP-3020-01-S (Rad Emissions Stack)

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 307

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described (H-3-71710, Rev. 2).
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described (H-3-71710, Rev. 2).
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Records review. Comment: Abated emissions are included in DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that monitoring requirements were met.
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: Records review. Comment: The "Pacific Northwest National Laboratory Effluent Management Quality Assurance Plan" (EM-QA-01) specifies quality assurance requirements.

NOC: Construction and Operation, Rev 0 **Permit:** AIR 94-803 **Date:** 08-02-1994 **NOC ID:** 41
Date In AOP: 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
Potential-to-emit abated (total effective dose equivalent to the maximally exposed individual) 2.6 E-03 mrem/yr.	Not Applicable	CDM: Records review. Comment: This project was never started up in this facility. Additionally, since the time of this approval, the facility has instituted Volumetric Release criteria for minute amounts of radioactive materials. The facility's volumetric release process was reviewed by WDOH and it was determined that if any radiological material could be released to the public (through volumetric release) that it would fall outside the purview of the WAC 246-247 regulations. This project would meet the criteria for volumetric release. This approval was closed by WDOH on 7/10/02.
Control Technology 1 - high efficiency particulate air filter, 1-fan	Continuous	CDM: Personnel interview. Comment: The Building Engineer confirmed that the radiological exhaust system is configured as described (H-3-71710, Rev. 2).
Stack Measurement - Periodic Confirmatory Measurements - 2 week sample/year	Continuous	CDM: Records review. Comment: Abated emissions are included in DOE/RL-20003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." This report was reviewed to verify that monitoring requirements were met.

NOC: Uranyl Nitrate Hexahydrate Project, Rev 1 **Permit:** Shortform Approval **Date:** 12-16-1997
NOC ID: 248 **Date In AOP:** 07-02-2001 **Date Obsolete:** 08-09-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The exhausted air from the evacuated cryostat chamber will be HEPA filtered and tied directly into the building exhaust of stack #4.	Not Applicable	CDM: N/A. Comment: N/A.
No periodic confirmatory measurement is required.	Not Applicable	CDM: N/A. Comment: N/A.
Unabated emissions will be reported annually using mass balance (engineering calculations)	Not Applicable	CDM: Records review. Comment: This project was never started up in this facility. Additionally, since the time of this approval, the facility has instituted Volumetric Release criteria for minute amounts of radioactive materials. The facility's volumetric release process was reviewed by WDOH and determined that if any radiological material could be released to the public (through volumetric release) that it would fall outside the purview of

WDOH Conditions	Comp. Status	Compliance Determination Method
		the WAC 246-247 regulations. This project would meet the criteria for volumetric release. This approval was closed by WDOH on 7/10/02.
Unabated dose: 6.8E-07 mrem/yr to the MEI	Not Applicable	CDM: N/A. Comment: N/A.
Abated dose: 6.8E-09 mrem/yr to the MEI	Not Applicable	CDM: N/A. Comment: N/A.
The annual possession quantities of depleted uranium (uranyl nitrate hexahydrate) - [234U, 235U, and 238U] for each calendar year cannot be exceeded without approval from Health. [The estimated annual quantities are 6.48 nCi for Calendar Year (CY) 1997, 19.2 nCi for Fiscal Year (FY) 1998, and 19.2 nCi for FY 1999.]	Not Applicable	CDM: N/A. Comment: N/A.

Emission Unit : (400) P-437-002

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 399

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Intermittent operation	Continuous	CDM: As-built drawing. Comment: H-4-62242.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description: 16 Parallel flow paths, each path provides 1 prefilter minimum of 1 in operation; intermittent operation	Continuous	CDM: As-built drawing. Comment: H-4-62242.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: 16 Parallel flow paths, each path provides 1 prefilter minimum of 1 in operation intermittent operation	Continuous	CDM: As-built drawing. Comment: H-4-62242.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (400) P-437MN&ST-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 385

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Contaminated Equipment Repair Area Abatement Technology: HEPA Required Units: 1 Add'l Description: 2 in parallel	Continuous	CDM: As-built drawings. Comment: H-4-62243.
Zone or Area: Contaminated Equipment Repair Area Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Waste Tank 1 & 2 Vents Abatement Technology: HEPA Required Units: 1 Add'l Description: 1 stage with 2 parallel flowpaths	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Radiological Waste Tank Room Ventilation Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-4-62243.

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Radiological Waste Tank Room Ventilation Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Liquid Radioactive Waste Loadout Facility Ventilation Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Liquid Radioactive Waste Loadout Facility Ventilation Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Decon 1 & 2 Abatement Technology: HEPA Required Units: 1 Add'l Description: 2 parallel flow paths, minimum of one HEPA operational	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Shipping Cask Maintenance and Decon Glove Box Abatement Technology: HEPA Required Units: 1 Add'l Description: 2 parallel flow paths, minimum of one HEPA operational	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Shipping Cask Maintenance and Decon Glove Box Abatement Technology: Prefilter Required Units: 1 Add'l Description:	Continuous	CDM: As-built drawing. Comment: H-4-62243.
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: In parallel, serves all MN&ST, intermittent use	Continuous	CDM: As-built drawing. Comment: H-4-62243.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (400) Sodium Storage Facility

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 398

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(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: N/A. Comment: No radioactive material has been added to this facility.

NOC: Sodium Storage Facility, Construction and Operation Permit: AIR 95-204 Date: 02-24-1995
NOC ID: 65 Date In AOP: 07-02-2001 Date Obsolete: 11-26-2002

No WDOH Conditions for this NOC.

Emission Unit : (400) P-FFTCBEX-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 397

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Access Control Area Process Abatement Technology: Fan Required Units: 2 Add'l Description: 2 in parallel, one leg has 2 in series, intermittent use	Continuous	CDM: As-built drawing. Comment: H-4-51203.
Zone or Area: Access Control Area Process Abatement Technology: HEPA Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-51203.
Zone or Area: Access Control Area Process Operations Abatement Technology: Prefilter Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-51203.
Zone or Area: Bldg 405 Process Operations Abatement Technology: Fan Required Units: 2 Add'l Description: In parallel (intermittent use)	Continuous	CDM: As-built drawing. Comment: H-4-11501.
Zone or Area: Bldg 405 Process Operations Abatement Technology: HEPA Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-11501.
Zone or Area: Bldg 405 Process Operations Abatement Technology: Prefilter Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-11501.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA Tritium	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (400) P-FFTFHTTR-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 396

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: In parallel, intermittent use	Continuous	CDM: As-built drawing. Comment: H-4-51262.
Zone or Area: Abatement Technology: Fan (Booster) Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-51262.
Zone or Area: Abatement Technology: HEPA Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-51262.
Zone or Area: Abatement Technology: Prefilter Required Units: 1 Add'l Description: Emergency standby	Continuous	CDM: As-built drawing. Comment: H-4-51262.

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

(No NOC records were found.)

Emission Unit : (400) P-FFTFRESB-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 395

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: Intermittent use. No other controls.	Continuous	CDM: As-built drawing. Comment: H-4-51251.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 4 week sample/ year Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EP-0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Ion Exchange Resin Columns Changeout **Permit:** AIR 97-1203 **Date:** 12-10-1997 **NOC ID:** 246
Date In AOP: 07-02-2001 **Date Obsolete:** 11-21-2002

No WDOH Conditions for this NOC.

Emission Unit : (600) S-6266-001

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 62

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WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 2 Add'l Description: In parallel	Continuous	CDM: As-built drawing. Comment: H-6-13325.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In parallel	Continuous	CDM: As-built drawing. Comment: H-6-13325.
Zone or Area: Abatement Technology: Prefilter Required Units: 2 Add'l Description: In parallel	Continuous	CDM: As-built drawing. Comment: H-6-13325.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/ quarter Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, CY02." Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Use or Portable Tanks and Revised Source Term Description **Permit:** AIR 01-1201 **Date:** 12-20-2001
NOC ID: 451 **Date In AOP:** 06-11-2002 **Date Obsolete:** 11-26-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Intermittent	CDM: Comment: Two deviations pertaining to the ventilation system were reported in the AOP Semiannual Report for the period July 1, 2002 through December 31, 2002.
The total abated emission limit for this Notice of Construction is limited to 2.80E-03 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 1.40E-02 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).	Continuous	CDM: The basis for the calculated abated and unabated emission limits is WHC-SD-WM-ASA-001, "Auditable Safety Analysis" (ASA). The basis did not change during the reporting period. Comment:
This process is limited to: WSCF providing analytical services to support chemical and radiological analyses conducted on a variety of solid, liquid, and vapor media. WSCF consists of the following: * Analytical Laboratory Building (696-W-1) - Solid, liquid, and vapor samples contaminated with low levels of radioactive material are processed, on a bench-scale basis, in fume hoods or other controlled air spaces in the building. Evaporation and wet chemistry also are used to prepare samples for analysis. Low-level waste drums are filled inside the laboratory building and transferred either to the solid waste storage building (described as follows) or other approved facilities on the Hanford Site, or the low-level waste drums are moved to various locations with WSCF. * Radiochemistry Laboratory (696-W-2) - This is a below	Continuous	CDM: Project procedure. Comment: Process descriptions are contained in a procedure. Processes did not change during the reporting period. An AOP Administrative Revision, approved on 7/23/02, changed the reference from 6266 to 6266A.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>grade counting room in the Analytical Laboratory Building with a separately controlled airspace within the building. * Environmental Data/Computer Center (6270) - This is a non-radiological building and will not be addressed further. * Environmental Sample Archive Building (6267) - This building provides for controlled storage, indexing, categorizing and retrieval of low-level contaminated samples. Storage is provided for up to 2,500 samples requiring refrigerated storage and up to 11,500 samples requiring ambient storage. This building also provides for temporary storage of unvented drums or other low-level waste, packaged in accordance with applicable laboratory procedures. Less than 100 low-level waste packages are stored at any one time. * Mobile Laboratory Storage Facility (6269) - This structure houses up to five mobile laboratories and provides protection from adverse weather conditions for the instrumentation and computers inside the mobile laboratories. This area contains calibration laboratory instrumentation used in the mobile laboratories, and a sample preparation area for adding chemical buffers and preservatives to sample containers. This building provides temporary storage of drums, or other waste packages contained with low-levels of radioactive material. Less than 100 low-level waste packages are stored at any one time. * Solid Waste Storage Building (6265A) - This open-sided building shall provide for temporary storage of drums or other low-level waste packages. Less than 100 low-level waste packages are stored at any one time and will not be addressed further in this license, as these are unvented drums. * Contaminated Liquid Waste Retention Vault (6266) - Consists of two 3,785-liter polyethylene tanks contained in a common concrete vault. The tanks are designed to receive low-level inorganic and radiologically contaminated liquid waste or sample excess from the analytical laboratory. The liquid routinely is transferred to an approved disposal facility on the Hanford</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Site using the portable tanker described as follows. This building also provides temporary storage of drums, or other waste packages contaminated with low-levels of radioactive material. Less than 100 low-level waste packages are stored at any one time. * Sample Equipment Cleaning Facility û This is a non-radiological building and will not be addressed further. * Portable Tanker(s) used for Wastewater Transport - Wastewater drums containing liquid waste contaminated with low-levels of radioactive material are stored temporarily at various locations within WSCF. In some cases, the contents of these drums are pumped into a portable tanker at the various locations for transport to other facilities. To accomplish the pumping, a small pump has its drop leg inserted into each drum through the bunghole or other opening, and flexible hose transfers the liquid to the tanker.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Alpha 0 3.30E-01 B/G 0 6.80E+00</p>	<p>Continuous</p>	<p>CDM: The basis for the calculated APQs is WHC-SD-WM-ASA-001, "Auditable Safety Analysis" (ASA). The basis did not change during the reporting period.</p> <p>Comment:</p>
<p>These Conditions and Limitations must be proceduralized and these procedures maintained for the lifetime of the facility.</p>	<p>Continuous</p>	<p>CDM: Project procedure</p> <p>Comment: The conditions and limitations are contained in a project level procedure.</p>
<p>If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during operation (as described in the NOC) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		required of the agency.
<p>The U.S. DOE shall monitor this emission unit as follows: 696-W-1 emission units shall be monitored periodically. The periodic sampling shall consist of a sample of stack effluent being withdrawn a minimum of two weeks per quarter.</p>	Continuous	<p>CDM: DOE/RL-2003-19, Rev.0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:</p>
<p>The department reserves the right to conduct its own environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).</p>	Not Applicable	<p>CDM: Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that the workers associated with these emission units are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(10)).</p>	Continuous	<p>CDM: Training records Comment:</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from these units (WAC 246-247-075(13)) and (WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above-cited regulation.</p>	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions." Comment:</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)). Periodic inspections will occur.</p>	Not Applicable	<p>CDM: Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	Not Applicable	<p>CDM: Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		completed in the future, or that pertain to actions required of the agency.
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: ERS for input data and calculations; DOE/RL-2003-19, Rev. 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: DOE/RL-2003-19, Rev. 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	Intermittent	<p>CDM:</p> <p>Comment: - On 8/14/02, the ventilation system shutdown from what was suspected to be several doors being open at the same time. The controller system was triggered from the low atmospheric pressure in the building and shut the system down. Rad air monitoring devices were operational during the shutdown. Boundary rad surveys did not show spread of contamination. Notification was made to WDOH within the required 24 hour timeframe. - On 12/2/02, during a restart of the ventilation system, after a pre-planned maintenance activity, the system shut down unexpectedly due to an electrical problem with a fan motor. The fan motor was replaced. Facility operations were halted and the ventilation system remained in the shutdown mode during the replacement. Rad air monitoring devices were operational during the shutdown. Boundary rad surveys did not show spread of contamination. Due to a misinterpretation of the reporting requirement, notification was not made to WDOH within the required 24 hour timeframe.</p>
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, and indicate whether or not any potential for airborne release occurred (WAC 246-247-080(6)).	Not Applicable	<p>CDM: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Records must be readily (promptly) available for these units. These records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: Facility regulatory file.</p> <p>Comment:</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	<p>Continuous</p>	<p>CDM: "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001.</p> <p>Comment:</p>
<p>The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The annual possession quantity of plutonium and strontium are considered conservative and noted that these radionuclides representative types of alpha and beta radiation that this facility expects to handle. The facility needs to verify annually that plutonium and strontium are the most conservative radionuclides this facility handles.</p>	<p>Continuous</p>	<p>CDM: Facility manager certification.</p> <p>Comment: The WSCF Facility Manager has certified, in writing, that plutonium and strontium were the radionuclides most conservatively handled at the facility during the reporting period.</p>
<p>The radiological control technology requirements are as follows: * 696-W-1 stack operates a pre-filter and a HEPA filter before entering the exhaust stack. When the ventilation system exits the analytical laboratory building and divides into two legs, each leg shall consist of a damper, a pre-filter, a HEPA filter bank (4x3), a damper, and a fan. The pre-filter housing is designed for</p>	<p>Intermittent</p>	<p>CDM:</p> <p>Comment: - On 8/14/02, the ventilation system shutdown from what was suspected to be several doors being open at the same time. The controller system was triggered from the low atmospheric pressure in the building and shut the system down. Rad air monitoring devices were operational during the shutdown. Boundary rad surveys did not show spread of contamination. - On 12/2/02, during a restart</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
ease of filter change without increased dust loading on the HEPA filters. Two exhaust fans are installed and operate in parallel under normal power.		of the ventilation system, after a pre-planned maintenance activity, the system shut down unexpectedly due to an electrical problem with a fan motor. The fan motor was replaced. Facility operations were halted and the ventilation system remained in the shutdown mode during the replacement. Rad air monitoring devices were operational during the shutdown. Boundary rad surveys did not show spread of contamination.

Emission Unit : (600) S-6266-002

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 63

Page in AOP: 2-194

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Fan Required Units: 1 Add'l Description: An additional standby fan recirculates the air flow back to Bldg. 6266 or can vent it to the atmosphere.	Continuous	CDM: As-built drawing. Comment: H-6-13331.
Zone or Area: Abatement Technology: HEPA Required Units: 2 Add'l Description: In parallel	Continuous	CDM: As-built drawing. Comment: H-6-13331.
Zone or Area: Abatement Technology: Prefilter Required Units: 2 Add'l Description: In parallel	Continuous	CDM: As-built drawing. Comment: H-6-13331.
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Record Sample Sampling Frequency: 2 week sample/ quarter Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Continuous	CDM: DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, CY02." Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93[b][4][i] WAC 246-247-075[3] Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Use or Portable Tanks and Revised Source Term Description **Permit:** AIR 01-1201 **Date:** 12-20-2001
NOC ID: 451 **Date In AOP:** 06-11-2002 **Date Obsolete:** 11-26-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: In compliance with all applicable conditions for this approval order. Comment:
The total abated emission limit for this Notice of Construction is limited to 2.80E-03 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 1.40E-02 mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).	Continuous	CDM: The basis for the calculated abated and unabated emission limits is WHC-SD-WM-ASA-001, "Auditable Safety Analysis" (ASA). The basis did not change during the reporting period. Comment:
This process is limited to: WSCF providing analytical services to support chemical and radiological analyses conducted on a variety of solid, liquid, and vapor media. WSCF consists of the following: * Analytical Laboratory Building (696-W-1) - Solid, liquid, and vapor samples contaminated with low levels of radioactive material are processed, on a bench-scale basis, in fume hoods or other controlled air spaces in the building. Evaporation and wet chemistry also are used to prepare samples for analysis. Low-level waste drums are filled inside the laboratory building and transferred either to the solid waste storage building (described as follows) or other approved facilities on the Hanford Site, or the low-level waste drums are moved to various locations with WSCF. * Radiochemistry Laboratory (696-W-2) - This is a below grade counting room in the Analytical Laboratory Building with a separately	Continuous	CDM: Project procedure. Comment: Process descriptions are contained in a procedure. Processes did not change during the reporting period. An AOP Administrative Revision, approved on 7/23/02, changed the reference from 6266 to 6266A.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>controlled airspace within the building. * Environmental Data/Computer Center (6270) - This is a non-radiological building and will not be addressed further. * Environmental Sample Archive Building (6267) - This building provides for controlled storage, indexing, categorizing and retrieval of low-level contaminated samples. Storage is provided for up to 2,500 samples requiring refrigerated storage and up to 11,500 samples requiring ambient storage. This building also provides for temporary storage of unvented drums or other low-level waste, packaged in accordance with applicable laboratory procedures. Less than 100 low-level waste packages are stored at any one time. * Mobile Laboratory Storage Facility (6269) - This structure houses up to five mobile laboratories and provides protection from adverse weather conditions for the instrumentation and computers inside the mobile laboratories. This area contains calibration laboratory instrumentation used in the mobile laboratories, and a sample preparation area for adding chemical buffers and preservatives to sample containers. This building provides temporary storage of drums, or other waste packages contained with low-levels of radioactive material. Less than 100 low-level waste packages are stored at any one time. * Solid Waste Storage Building (6265A) - This open-sided building shall provide for temporary storage of drums or other low-level waste packages. Less than 100 low-level waste packages are stored at any one time and will not be addressed further in this license, as these are unvented drums. * Contaminated Liquid Waste Retention Vault (6266) - Consists of two 3,785-liter polyethylene tanks contained in a common concrete vault. The tanks are designed to receive low-level inorganic and radiologically contaminated liquid waste or sample excess from the analytical laboratory. The liquid routinely is transferred to an approved disposal facility on the Hanford Site using the portable tanker described as follows. This building also provides</p>		

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>temporary storage of drums, or other waste packages contaminated with low-levels of radioactive material. Less than 100 low-level waste packages are stored at any one time. * Sample Equipment Cleaning Facility û This is a non-radiological building and will not be addressed further. * Portable Tanker(s) used for Wastewater Transport - Wastewater drums containing liquid waste contaminated with low-levels of radioactive material are stored temporarily at various locations within WSCF. In some cases, the contents of these drums are pumped into a portable tanker at the various locations for transport to other facilities. To accomplish the pumping, a small pump has its drop leg inserted into each drum through the bunghole or other opening, and flexible hose transfers the liquid to the tanker.</p>		
<p>The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Alpha 0 3.30E-01 B/G 0 6.80E+00</p>	<p>Continuous</p>	<p>CDM: The basis for the calculated APQs is WHC-SD-WM-ASA-001, "Auditable Safety Analysis" (ASA). The basis did not change during the reporting period.</p> <p>Comment:</p>
<p>If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during operation (as described in the NOC) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The U.S. DOE shall monitor this emission unit as follows: 696-W-2 emission units shall be monitored periodically. The periodic sampling shall consist of a sample being drawn a</p>	<p>Continuous</p>	<p>CDM: DOE/RL-2003-19, Rev.0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
minimum of two weeks per quarter.		
The department reserves the right to conduct its own environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).	Not Applicable	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate that the workers associated with these emission units are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).	Continuous	<p>CDM: Training records</p> <p>Comment:</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from these units (WAC 246-247-075(13)) and (WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above-cited regulation.	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
The department reserves the right to inspect and audit this unit during construction and operation including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)). Periodic inspections will occur.	Not Applicable	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: ERS for input data and calculations; DOE/RL-2003-19, Rev. 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		Comment:
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	CDM: DOE/RL-2003-19, Rev. 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours.</p> <p>Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	Not Applicable	CDM: N/A. Comment: There were no shutdowns or unexpected releases that resulted in emissions in excess of any cited standards during the reporting period.
When this project is completed, or operations cease, the facility shall notify the department via a report of closure, and indicate whether or not any potential for airborne release occurred (WAC 246-247-080(6)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Records must be readily (promptly) available for these units. These records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).	Continuous	CDM: Facility regulatory file. Comment:
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced	Continuous	CDM: "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001. Comment:

WDOH Conditions	Comp. Status	Compliance Determination Method
inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.		
The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The radiological control technology requirements are as follows: * 696-W-2 stack operates a ventilation system that splits into two legs. Each leg of the parallel system must consist of a damper, a pre-filter, a HEPA filter bank (4x3), and a damper. The installed filtration system provides a minimum of 99.95% collection efficiency. After the air passes through the parallel system, the legs join together and pass through the fan. The airflow is divided into two paths, with approximately 10% of the airflow exhausting directly to the stack, and the other approximately 90% of flow recycling back into the building. The damper and fan regulate the flow.	Continuous	<p>CDM: As-built drawings, leak test, and stack flow test data reports.</p> <p>Comment:</p>
The annual possession quantity of plutonium and strontium are considered conservative and noted that these radionuclides representative types of alpha and beta radiation that this facility expects to handle. The facility needs to verify annually that plutonium and strontium are the most conservative radionuclides this facility handles.	Continuous	<p>CDM: Facility manager certification.</p> <p>Comment: The WSCF Facility Manager has certified, in writing, that plutonium and strontium were the most conservative radionuclides handled at the facility during the reporting period.</p>
These Conditions and Limitations must be proceduralized and these procedures maintained for the lifetime of the facility.	Continuous	<p>CDM: Project procedure.</p> <p>Comment: The conditions and limitations are contained in a project level procedure.</p>

Emission Unit : (Sitewide) W-PORTEX 021

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 476

Page in AOP: 2-198

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Collection Tank and Plate Separator Required Units: 1 Add'l Description:	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589
Zone or Area: Abatement Technology: Cyclone Separator Required Units: 1 Add'l Description: Baghouse with 72 bags each.	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589
Zone or Area: Abatement Technology: Micro-strainer Device Required Units: 1 Add'l Description:	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589
Zone or Area: Abatement Technology: HEPA Required Units: 3 Add'l Description: Three in-place tested HEPA filters in parallel.	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589

(No WDOH Monitoring records were found.)

NOC: Use of the Guzzler Vacuum Excavation System for Radiologically Limited Activities, Rev.0A
Permit: AIR 02-302 **Date:** 03-06-2002 **NOC ID:** 328 **Date In AOP:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Continuous	CDM: Review of compliance status for conditions in this NOC approval. In compliance with all applicable conditions for this approval order. Comment:
The total abated emission limit for this Notice of Construction is limited to 5.00E-02 mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to 5.00E-02 mrem/year to the Maximally Exposed Individual	Continuous	CDM: Review of Radiological Survey Records and "PNNL Box Assayer Results." Comment: Review of Radiological Survey Reports showed that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results showed that any radionuclides observed were equivalent to levels detected in background spectra.

WDOH Conditions	Comp. Status	Compliance Determination Method
(WAC 246-247-030(21)).		
This process is limited to: the utilization of the Guzzler Vacuum Excavation System (Guzzler) for potholing to support utility locations, soil removal/general excavations, and radiologically limited activities (i.e.,	Continuous	<p>CDM: Review of Guzzler procedure, Radiological Survey Reports and usage request information by Guzzler Coordinator, training.</p> <p>Comment:</p>
The Annual Possession Quantity is limited to the following radionuclides (Curies/year): Alpha 0 4.44E-03 Beta 0 1.49E-01	Continuous	<p>CDM: Review of Radiological Survey Records and "PNNL Box Assayer Results."</p> <p>Comment: Review of Radiological Survey Reports showed that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results showed that any radionuclides observed were equivalent to levels detected in background spectra.</p>
The facility must be able to demonstrate the reliability and accuracy of emissions data and other test results from this emission unit (WAC 246-247-075(13)).	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
These Conditions and Limitations must be documented in an established procedure prior to starting activities granted by this approval (WAC 246-247-040(5) and WAC 246-247-060(5)).	Continuous	<p>CDM: Procedure AP-03-EO-002, Rev.1, "Conditions and Limitations for Radiologically Controlled Guzzler."</p> <p>Comment:</p>
If this emission unit is not in compliance with the standards in WAC 246-247-040 during construction or operation, the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060-(2)(d)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall notify the department seven days in advance of any planned pre-operational testing of the emission unit's control, monitoring or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Continuous	<p>CDM: Copy of e-mail notification to Ecology.</p> <p>Comment: Ecology was notified by e-mail within the seven day limit of the intent to perform the annual NDA of the HEPA filters.</p>
U.S. DOE shall monitor this project or emission unit as follows: In addition to the surveys described in	Continuous	<p>CDM: Review of Radiological Survey Records and "PNNL Box Assayer Results."</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>this NOC periodic confirmatory measurements are required. This may include but is not limited to NDA testing of the HEPA filters when the HEPA filters are replaced and annually screening the HEPA filtration system using gamma spectroscopy (WAC 246-247-075(8)).</p>		<p>Comment: Review of Radiological Survey Reports showed that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results showed that any radionuclides observed were equivalent to levels detected in background spectra.</p>
<p>The department retains the right to conduct stack sampling, environmental monitoring or other testing around this unit to assure compliance. If directed by the department, the facility must make provision for such testing (WAC 246-247-075(9) and (10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate workers associated with this emission unit are trained in the use and maintenance of control and monitoring systems, and in the performance of associated tests and emergency procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: Training records, pre-job meetings, experience and self-study.</p> <p>Comment:</p>
<p>The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards (WAC 246-247-075(6)).</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
<p>The Department reserves the right to inspect and audit all construction activities, equipment, operations, documents, data and other records related to compliance with the requirements of this chapter (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM:</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must meet all reporting and record keeping requirements of</p>	<p>Continuous</p>	<p>CDM: "PNNL Box Assayer Results on Guzzler Truck" are on file and used for reporting in DOE/RL-2003-19,</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
40 CFR 61, Subpart H. (WAC 246-247-080(2)).		<p>"Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
The facility shall report all measured or calculated emissions annually (WAC 246-247-080(3)).	Continuous	<p>CDM: DOE/RL-2003-19, Rev.0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>The facility shall report to the department within 24 hours, any unexpected release of radioactivity, shutdown or other condition that, if allowed to persist, or lasts more than four hours, would result in the emission of radionuclides in excess of any standards or limitation in the license. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitation included in this approval (paragraph 5) (WAC 246-247-080(5)).</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: No reports were required during the reporting period.</p>
<p>Prior to permanent shut down of an emission unit or completion of an activity, the permittee shall file a report of closure with the Department of Health. The report of closure shall include the date of the shutdown and indicate whether, despite cessation of operation, there is still a potential for radioactive air emissions and a need for any active or passive ventilation system with emission control and/or monitoring devices. An emission unit or activity will not be considered permanently shut down or completed until a report of closure is received and approved by Health. Once an emission unit is permanently shut down or an activity is completed, thereby rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>shutdown or completion, to meet any monitoring, record keeping, and reporting, requirements which are no longer applicable for that emission unit or activity. All records, relating to the shut down emission unit or completion of an activity, generated while the emission unit or activity was in operation, shall be kept in accordance with (WAC 246-247-080(8)). (WAC 246-247-080(6)).</p>		
<p>The facility must maintain a log in an approved format for this activity or emission unit (WAC 246-247-080(7)).</p>	Continuous	<p>CDM: Ecology approved Guzzler Operating Log is maintained by the Guzzler Coordinator. Comment:</p>
<p>The facility shall maintain readily (promptly) retrievable storage areas (on site) for all records and documents related to, and which may help establish compliance with, the requirements of this chapter. The facility shall keep these records available for department inspection for at least five years (WAC 246-247-080(8)).</p>	Continuous	<p>CDM: Regulatory file. Comment:</p>
<p>The facility shall ensure all emissions units are fully accessible to department inspectors. In the event the hazards associated with accessibility to a unit require training and/or restriction or requirements for entry, the facility owner or operator shall inform the department, prior to arrival, of those restrictions or requirements. The owner or operator shall be responsible for providing the necessary training, escorts, and support services to allow the department to inspect the facility. At a minimum for unannounced inspections, such requirements or restrictions must be told to inspectors to provide an opportunity for inspectors to meet those requirements prior to the inspection (WAC 246-247-080(9)).</p>	Not Applicable	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The facility shall make available, in timely manner, all documents requested by the department for review. The facility shall allow the department to review documents in advance of an inspection. The facility shall allow access to classified documents by representatives of the department with the appropriate security clearance and a demonstrable need-to-know (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The following are the allowable radionuclides: Co-60, Sr-90, Cs-137, Cs-134, Th-232, U-234, U-235, U-238, Eu-152, Eu-154, Eu-155, Ru-106, Sn-113, Sb-125, Am-241, Pu-238, Pu-239, Pu-240, and Pu-241. If any other radionuclides are suspected or verified through soil analysis the department must be notified.</p>	<p>Continuous</p>	<p>CDM: No other radionuclides are suspected or verified by analysis.</p> <p>Comment:</p>
<p>The following are the annual emission limits for the NOC: 100 AREA: For Guzzler Cleaning/Excavation: 2.88E-3 mrem Sr-90, 3.4E-2 mrem Am-241 For Backfilling: 2.88E-6 mrem Sr-90, 3.45E-5 mrem Am-241 200 AREA: For Guzzler Cleaning/Excavation: 1.96E-3 mrem Sr-90, 2.34E-2 mrem Am-241 For Backfilling: 1.96E-6 mrem Sr-90, 2.34E-5 mrem Am-241 300 AREA: For Guzzler Cleaning/Excavation: 3.9E-2 mrem Sr-90, 8.3E-3 mrem U-234 For Backfilling: 3.9E-5 mrem Sr-90, 8.3E-6 mrem U-234 400 AREA: For Guzzler Cleaning/Excavation: 8.5E-4 mrem Sr-90, 8.34E-3 mrem Pu-239 For Backfilling: 8.5E-7 mrem Sr-90, 8.34E-6 mrem Pu-239.</p>	<p>Continuous</p>	<p>CDM: Review of Radiological Survey Records and "PNNL Box Assayer Results."</p> <p>Comment: Review of Radiological Survey Reports showed that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results showed that any radionuclides observed were equivalent to levels detected in background spectra.</p>
<p>All soil excavation activities operating under this NOC must cease operations when sustained wind conditions reach or exceed 20 miles per hour.</p>	<p>Continuous</p>	<p>CDM: Operator and RCT training to NOC Conditions/Limitations.</p> <p>Comment:</p>

NOC: Guzzler Vacuum Excavation System for Radiologically Limited Activities on the Hanford Site
Permit: AIR 98-1215 Date: 12-18-1998 NOC ID: 328 Date In AOP: 07-02-2001
Date Obsolete: 03-05-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Intermittent	CDM: Review of compliance status for conditions in this NOC approval. Comment: As not all the conditions listed were complied with, this condition is intermittent. This deviation was originally reported on November 29, 2001.
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Intermittent	CDM: Procedure review. Comment: The existing procedure did not adequately cover all conditions and limitations. This deviation was originally reported on November 29, 2001.
This approval, with its Conditions and Limitations, constitutes an amendment to the Department's Radioactive Air Emission License. This amendment must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
If the department finds that the emission unit described in this NOC, is not in compliance with the standards in WAC 245-247-040 during construction, as described in this NOC, or during operation, it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emissions control, monitoring or containment systems (if conducted). The department reserves the right to observe such tests (WAC 246-247-060(4)).	Continuous	CDM: Copy of e-mail notification to Ecology. Comment: Ecology was notified by e-mail within the seven day limit of the intent to perform the annual NDA of the HEPA filters.
U.S. DOE shall monitor this project or emission unit as follows: In addition to the surveys described in this NOC periodic confirmatory measurements are required. This may include but not limited to NDA testing of the HEPA filters when the HEPA filters are replaced and annually screening the HEPA filtration system using gamma	Continuous	CDM: Radiological Survey Records and "PNNL Box Assayer Results on Guzzler Truck." Comment: Review of Radiological Survey Reports showed that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results showed that any radionuclides observed were equivalent to levels detected in background spectra.

WDOH Conditions	Comp. Status	Compliance Determination Method
spectroscopy (WAC 246-247-075(8)).		
The department retains the right to conduct its own stack sampling, environmental monitoring or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility must be able to demonstrate that the workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).	Continuous	<p>CDM: Training records, pre-job meetings, experience and self-study.</p> <p>Comment:</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in, or equivalent to, those listed in the above cited regulation.	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: Regulatory file for recordkeeping and DOE/RL-2003-19, Revision 0, "Radioactive Air Emissions Report for the Hanford Site, Calendar Year 2002."</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		Comment:
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	CDM: DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that last more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in the approval (paragraph 5) (WAC 246-247-080(5)).	Not Applicable	CDM: N/A. Comment: No reports were required during reporting period.
When the Guzzler ceases operations in conjunction with this NOC, the facility shall notify the department via a report of closure, including whether or not any potential for airborne releases occurred (WAC 246-247-080(6)).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The facility must maintain a log in an approved format for this activity or emission unit (WAC 246-247-080(7)).	Intermittent	CDM: Records review. Comment: The Guzzler Operating Log was approved by Ecology on January 24, 2002.
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least 5 years (WAC 246-247-080(8)).	Continuous	CDM: Regulatory file. Comment:
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections as	Continuous	CDM: "Memorandum of Understanding for Initial Point-of-Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001. Comment:

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors immediately, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>		
<p>The facility shall make requested documents available in a timely manner for review. (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The Guzzler is a self contained vacuum type equipment system allowing soil to be slowly dumped from the collection tank by controlling the raising and lowering speed of the tank. Soil from contaminated areas will be cleaned and excavated using the Guzzler. In some cases, however, an area may be physically in accessible for the regulated Guzzler. In those instances, the cleaning or excavation, as well as any backfilling activities will be completed using backhoes, loaders, compactors with plates, and/or picks an shovels, as appropriate.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The Guzzler filtration system must consist of a collection tank and plate separator device, cyclone separators; baghouse systems (99% efficient) with 72 bags each, equipped with a cyclic bag cleaning air blow-back system; micro-strainer device; and a HEPA filter system consisting of three in place tested HEPA filters in parallel (99.95% efficient system). The air lance system located on the Guzzler must be utilized when the system is operating. During the use of the Guzzler and soil excavation the hand held water mister must be used to control the generation of dust. During cleaning or excavation, the soil will be surveyed by Health Physicist</p>	<p>Intermittent</p>	<p>CDM: Records review.</p> <p>Comment: The air lance system is not always used when the guzzler is operating. This condition has been changed. This deviation was originally reported on November 29, 2001.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
Technicians (HPTs) over every linear and vertical foot prior to excavation or cleaning.		
The following are the allowable radionuclides: Sr-90, CS-137, Cs-134, Th-232, U-234, U-235, U-238, Eu-154, Eu-155, Ru-106, Sn-113, Sb-125, Am-241, Pu-238, Pu-239, Pu-240, and Pu-241. If any other radionuclides are suspected or verified through soil analysis the department must be notified.	Continuous	<p>CDM: No contamination was encountered during the reporting period. Proper notification was made to the department.</p> <p>Comment:</p>
The annual possession quantities are not to exceed the limits for each area describd in enclosure 3 of this NOC.	Continuous	<p>CDM: Review of Radiological Survey Records and "PNNL Box Assayer Results."</p> <p>Comment: Review of Radiological Survey Reports show that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results show that any radionuclides observed were equivalent to levels detected in background spectra.</p>
The following are the annual emission limits for the NOC:: 100 AREA For Guzzler Cleaning/Excavation: 1.44E-3mrem Sr-90 3.4E-2mrem Am-241 For Backfilling: 1.44E-6mrem Sr-90 3.45E-5mrem Am-241 200AREA For Guzzler Cleaning/Excavation: 9.81E-4mrem Sr-90 2.34E-2mrem Am-241 For Backfilling: 9.81E-7mrem Sr-90 2.34E-5mrem Am-241 300 AREA For Guzzler Cleaning/Excavation: 1.95E-3mrem Sr-90 8.3E-3mrem U-234 For Backfilling: 1.95E-5mrem Sr-90 8.3E-6mrem U-234 400 AREA For Guzzler Cleaning/Excavation: 4.25E-4mrem Sr-90 8.34E-3mrem Pu-239 For Backfilling: 4.25E-7mrem Sr-90 8.34E-6mrem Pu-239	Continuous	<p>CDM: Review of Radiological Survey Reports and "PNNL Box Assayer Results."</p> <p>Comment: Review of Radiological Survey Reports showed that no contamination was found during any of the guzzler activities in calendar year 2002. NDA results showed that any radionuclides observed were equivalent to levels detected in background spectra.</p>
All soil excavation activities operating under this NOC must cease operations when sustained wind conditions reach or exceed 20 miles per hour.	Continuous	<p>CDM: Operator and RCT training to NOC Conditions/Limitations.</p> <p>Comment:</p>

Emission Unit : (Sitewide) W-PORTEX 021

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 476

Page in AOP: 2-200

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: Abatement Technology: Collection Tank and Plate Separator Required Units: 1 Add'l Description:	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589
Zone or Area: Abatement Technology: Cyclone Separator Required Units: 1 Add'l Description: Baghouse with 72 bags each.	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589
Zone or Area: Abatement Technology: Micro-strainer Device Required Units: 1 Add'l Description:	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589
Zone or Area: Abatement Technology: HEPA Required Units: 3 Add'l Description: Three in-place tested HEPA filters in parallel.	Continuous	CDM: Visual verification Comment: Guzzler manufacture drawing SK-589

(No WDOH Monitoring records were found.)

NOC: Guzzler Excavation and Backfilling Activities **Permit:** Shortform Approval **Date:** 12-23-1997
NOC ID: 250 **Date In AOP:** 07-02-2001 **Date Obsolete:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
HPT field surveys every vertical and linear foot of excavation.	Continuous	CDM: Field interviews. Comment:
Aerosol testing and NDA of Guzzler HEPA filters, annually.	Intermittent	CDM: Field interviews. Comment: Records are misplaced and a work package was not generated to complete annual testing.

Emission Unit : (Sitewide) W-PORTEX 007

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 455

Page in AOP: 2-201

(No WDOH Abatement Controls records were found.)

(No WDOH Monitoring records were found.)

NOC: Use of HEPA Filtered Vacuum Radioactive Air Emission Units, Revision 1 Permit: AIR 99-1103

Date: 11-04-1999 NOC ID: 410 Date In AOP: 07-02-2001 Date Obsolete: 03-05-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Intermittent	<p>CDM: Review of conditions in this approval order.</p> <p>Comment: Compliance for the HEPA filter testing condition was intermittent. Current in-field annual testing of HEPA filters meets the intent of the AOP condition. Compliance is continuous for poly-dispersal droplet testing, the appropriate standard, but intermittent for the condition as written in the AOP.</p>
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	<p>CDM: Compliance matrix/procedures, and procedures FS-NOP-16-002, 2201 0808 002, LEF-OP-008, and WMP-340, Section 4.03.</p> <p>Comment:</p>
This approval, with its Conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)), and will at that time, constitute a revision of the Radioactive Air Emissions License.	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in this NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emission control, monitoring, or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: No pre-operational tests performed.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The department retains the right to conduct its own stack sampling, environmental monitoring, or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).</p>	<p>Continuous</p>	<p>CDM: Training records and/or training program.</p> <p>Comment:</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: For calculations and input data from stack and ambient air monitors, the ERS electronic system. Information from other than stacks and ambient air monitors resides at the individual facility. For annual reporting, DOE/RL-2002-20, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2001."</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
		Comment:
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	CDM: DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Comment:
If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).	Not Applicable	CDM: N/A. Comment: No reports required. There were no unexpected releases of radioactivity or shutdowns.
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).	Continuous	CDM: Records verification. Comment:
This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance to have reasonable time to meet the requirements.	Continuous	CDM: "Memorandum of Understanding For Initial Point of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001, satisfies this requirement. Comment:
The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).	Not Applicable	CDM: N/A. Comment: No documents were requested.

WDOH Conditions	Comp. Status	Compliance Determination Method
The required controls are as described as follows: The HVU's must be field tested annually, requiring an aerosol test/efficiency test or equivalent pass/fail criteria of 95.95% for particles of 0.3 micron median diameter. In addition, the HVU's filtration systems are to be tested whenever the configuration is modified and/or the filtration system is opened. A smear of the exhaust port shall be conducted before and after each use of HVU's. If the exhaust port smear is positive, the unit shall be tagged and removed from service.	Intermittent	<p>CDM: Test procedures and field interview.</p> <p>Comment: The AOP condition states a standard for manufacturers testing of HEPA filters. Current in-field annual testing of HEPA filters meets the intent of the AOP condition. Compliance is continuous for poly-dispersal droplet testing, the appropriate standard, but intermittent for the condition as written in the AOP.</p>

NOC: Use of HEPA Filtered Vacuum Radioactive Air Emission Units, Revision 1A **Permit:** RTAM
Date: 02-15-2000 **NOC ID:** 425 **Date In AOP:** 07-02-2001 **Date Obsolete:** 03-05-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
(condition revised from AIR 99-1103) Monitoring requirements are as follows: In the event that the exhauster is used on different emission units Department of Health reserves the right to request a nondestructive analysis / assay (NDA) after each exhaust job assignment (WAC 246-247-075(3)). The monitoring includes: emission estimates to include the methodology, all monitoring measurement results taken during the operation, copy of all logs kept on site and the summary submitted to the department on June 30th. One of the following methods may be chosen for actual emissions reporting, results of smears on the exhaust ports, maximum contamination level encountered or analysis results, area cleaned, air emission source constituents if other than plutonium 239 and strontium 90 potential radionuclide releases.	Continuous	<p>CDM: No NDA was requested by WDOH. Monitoring is reported in annual HEPA Vacuum report. Exhaust port was smeared.</p> <p>Comment:</p>
(condition revised from AIR 99-1103) The abated dose limit for this NOC shall not exceed 2.5E-05 mrem/yr to the MEI for each facility as described in the NOC. The unabated dose limit calculated for each facility is 4.97E-02 mrem/yr.	Continuous	<p>CDM: Smearing exhaust port showed no radionuclides.</p> <p>Comment:</p>
(condition revised from AIR 99-1103) The approved process is as follows: The HVU's fall into two categories. The first category is the use if the HVU's for the	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
reduction of smearable contamination (including the special cases listed in Appendix C) and the other is to reduce fixed contamination. Soil matrices are excluded from this NOC.		the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
(condition revised from AIR 99-1103) The required possession quantity is APQ's calculated for a maximum annual combined use of HVU's by an individual facility or activity. APQ's are based on hypothetical worst-case source terms that all HVU's at an individual facility combined could handle during a year and remain below 0.05 mrem per year unabated dose.	Continuous	CDM: Calculations and/or field interview. Calculations are on file. Comment:

NOC: HEPA vacuums dedicated for use in routine cleanup **Permit:** ERC Team Meeting Minutes, CCN 053924
Date: 10-24-1997 **NOC ID:** 239 **Date In AOP:** 07-02-2001 **Date Obsolete:** 07-10-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Logs must be kept up to date, and are auditable.	Not Applicable	CDM: N/A. Comment: This condition applies only to ERC and not to sitewide use of the HEPA Vac. This request is not used any more.

NOC: HEPA Filtered Vacuum Radioactive Air Emission Units (HVU) **Permit:** AIR 02-303 **Date:** 03-06-2002
NOC ID: 410 **Date In AOP:** 12-31-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
The U.S. Department of Energy shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Intermittent	CDM: Comment: Current in-field annual testing of HEPA filters meets the intent of the AOP condition. Compliance is continuous for poly-dispersal droplet testing, the appropriate standard, but intermittent for the condition as written in the AOP. The logs for one use of the HVU were transmitted 3 days late.
The total abated emission limit for this Notice of Construction is limited to 2.50E-05 mrem/year to the Maximally Exposed Individual. The total unabated emission limit for this Notice of Construction is limited to 4.97E-02 mrem/year to the Maximally Exposed Individual.	Continuous	CDM: Abated: DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002." Unabated: Verified that the release information used to determine unabated emissions in the NOC application has not increased. Comment:
This process is limited to: the use of specified HVUs located and operated on	Not Applicable	CDM: N/A.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>the Hanford Site, and represents establishment of unregistered, portable and temporary, insignificant emission units. For the purposes of estimating (modeling) offsite exposures for this application, all applicable HVU emissions at an individual facility (e.g., B Plant Complex, C Tank Farm, SX Tank Farm, T Plant Complex, 100-K East Basin, 100-K West Basin, 324 Building, 340 Complex, etc.) or activity (e.g., D&D of a building) will be considered as a single emission point for that facility. HVUs are portable cleaners with exhaust flow rates ranging from 50 to 300 cubic feet per minute. The units control radionuclide emissions by providing filtered vacuuming for surfaces that radioactively are contaminated. HVUs fall into two categories of use, those used for the reduction of smearable contamination and those used to reduce fixed contamination. For smearable contamination, the use of HVUs is limited to reduction of contamination on hard surfaces (e.g., concrete, permanently installed metal equipment such as riser, ventilation system components, piping, etc.). Soil matrices are excluded from this NOC. Smearable contamination on these hard surfaces will not exceed limits established in DOE/RL-96-109. These limits, if exceeded, require the affected are to be posted as a high contamination area. The limits are 2,000 disintegrations per minute per 100 square centimeters (dpm/100cm²) alpha contamination and 100,000 dpm/100cm² beta/gamma contamination. An exception to these limits is restricted to spot surface contamination areas found during outdoor radiological field surveys, and to clean up localized, radiologically contaminated material (e.g., dust, dirt, bird droppings, animal feces, insects, spider webs, tumbleweed fragments, etc.). These types of materials could have beta/gamma contamination levels exceeding 1 million dpm/100 cm², but are very localized, (I.e., a few square meter, rather than hundreds of square</p>		<p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
meters) and occur in contamination areas, buffer zones, and clean zones. This exception does not apply to areas normally posted as high contamination areas. The second category of use is for reduction of fixed contamination, involving the removal and/or penetration of contaminated surfaces. This category of use includes using HVUs and associated shrouded tools for sanding, stripping, spalling, drilling, and cutting operations. Limits in areas of fixed contamination to ensure compliance will be established before these tools are used.		
The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emission control, monitoring, or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: No pre-operational tests performed.</p>
If the department finds that the emission unit described in the NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in this NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.	Continuous	<p>CDM: Compliance matrix/procedures, and procedures FS-NOP-16-002, 2201 0808 002, LEF-OP-008, and WMP-340, Section 4.03.</p> <p>Comment:</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The required controls are described as follows: The HVUs must be field tested annually, requiring an aerosol test/efficiency test or equivalent pas/fail criteria of 95.95% for particles of 0.3 micron median diameter. In addition, the	Intermittent	<p>CDM: Test procedures and field interview.</p> <p>Comment: The AOP condition states a standard for manufacturers testing of HEPA filters. Current in-field annual testing of HEPA filters meets the intent of the</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>HVU's filtration systems are to be tested whenever the configuration is modified and/or the filtration system is opened. A smear of the exhaust port shall be conducted before and after each use of HVUs. If the exhaust port smear is positive, the unit shall be tagged and removed from service.</p>		<p>AOP condition. Compliance is continuous for poly-dispersal droplet testing, the appropriate standard, but intermittent for the condition as written in the AOP.</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).</p>	<p>Continuous</p>	<p>CDM: For calculations and input data from stack and ambient air monitors, the ERS electronic system. Information from other than stacks and ambient air monitors resides at the individual facility. For annual reporting, DOE/RL-2003-19, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: No documents were requested.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance to have reasonable time to meet the requirements.</p>	<p>Continuous</p>	<p>CDM: "Memorandum of Understanding For Initial Point of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001, satisfies this requirement.</p> <p>Comment:</p>
<p>The department retains the right to conduct its own stack sampling, environmental monitoring, or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility must be able to demonstrate that workers associated with this emission unit are adequately trained in the use and maintenance of emission</p>	<p>Continuous</p>	<p>CDM: Training records and/or training program.</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).		
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours.</p> <p>Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard (paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: No reports required. There were no unexpected releases of radioactivity or shutdowns.</p>
<p>The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and (WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulations.</p>	<p>Continuous</p>	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
<p>The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).</p>	<p>Continuous</p>	<p>CDM: Records verification.</p> <p>Comment:</p>
<p>Monitoring requirements are as follows: In the event that the exhauster is used on different emission units, the Department of Health reserves the right to request a nondestructive analysis/assay (NDA) after each exhaust job assignment</p>	<p>Continuous</p>	<p>CDM: Records review.</p> <p>Comment: No NDA requested. Reports submitted quarterly as required via email. Reports included scanned copies of the logsheets.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>(WAC 246-247-075(3)). The monitoring includes: emission estimates to include the methodology, all monitoring measurement results taken during the operation, copy of all logs kept on site and the summary submitted to the department on June 30th. Log sheets will include the following information: results of smears on the exhaust port, maximum contamination level encountered or analysis results, area cleaned, and air emission source constituents if other than plutonium 239 and strontium90 potential radionuclide releases.</p>		
<p>The approved process is as follows: The HVUs fall into two categories. The first category is the use if the HVU's for the reduction of smearable contamination (including the special cases listed in Appendix C) and the other is to reduce fixed contamination. Soil matrices are excluded from this NOC.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The required possession quantity is APQ's calculated for a maximum annual combined use of HVU's by an individual facility or activity. APQ's are based on hypothetical worst-case source terms that all HVU's at an individual facility combined could handle during year and remain below 0.05 mrem per year unabated dose.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>All HEPA vacuum logs shall be submitted to the department on a quarterly basis (beginning with the first quarter of 2002). This submittal shall be to the department 30 days after the end of each quarter.</p>	<p>Intermittent</p>	<p>CDM: Comment: Logs submitted as required via email. The logs for one HVU use were transmitted 3 days late.</p>
<p>This NOC shall be revised no later than September 1, 2002.</p>	<p>Continuous</p>	<p>CDM: Revision submitted before September 1, 2002 via letter 02-RCA-0551 (8/29/02). Comment:</p>

Emission Unit : (Sitewide) PTRAEU

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 447

Page in AOP: 2-204

WDOH Abatement Conditions	Comp. Status	Compliance Determination Method / Comments
Zone or Area: type-1 Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: type-2 and type-3 Abatement Technology: HEPA Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
Zone or Area: type-2 and type-3 Abatement Technology: Charcoal filter Required Units: 1 Add'l Description:	Continuous	CDM: Field interviews. Comment:
WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Sampling Frequency: Annual, unless otherwise specified by the NOC. Radionuclide Requiring Measurement: TOTAL ALPHA TOTAL BETA	Not Applicable	CDM: N/A. Comment: No annual sampling is required by the NOC, smear surveys taken.
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies both the hardware and method used to sample and the analytical methods used in the laboratory. Comment:

NOC: Use of Portable/Temporary Radionuclide Airborne Emissions Units, Rev 2 **Permit:** AIR 99-1102
Date: 11-04-1999 **NOC ID:** 411 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this license (WAC 246-247-060(5)).	Intermittent	CDM: Compliance status review for conditions in this NOC approval. Comment: RHL calculations are not being tracked in all cases.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>These Conditions and Limitations must be proceduralized prior to starting the activities described in the Notice of Construction.</p>	<p>Continuous</p>	<p>CDM: HNF-RD-8703, compliance matrix/work packages. Comment:</p>
<p>This approval, with its conditions and Limitations, must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction (as described in this NOC or during operation) it reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The facility shall notify the department at least seven days prior to any planned preoperational testing of the emission unit's emission control, monitoring, or containment systems. The department reserves the right to observe such tests (WAC 246-247-060(4)).</p>	<p>Continuous</p>	<p>CDM: No planned pre-operational testing occurred during reporting period. Comment:</p>
<p>The department retains the right to conduct its own stack sampling, environmental monitoring, or other testing, as required around this unit to assure compliance. If the department so decides, the facility must make provision for such testing (WAC 246-247-075(10) and (11)).</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>Monitoring requirements are as follows: In the event that the exhauster is used on different emission units Department of Health reserves the right to request a nondestructive analysis / assay (NDA) after each exhaust job assignment (WAC 246-247-075(3)). The monitoring includes: emission estimates to include the methodology, all monitoring measurement results taken during the operation, copy of all logs submitted to the department on June 30th. One of the following methods may be chosen for</p>	<p>Continuous</p>	<p>CDM: No NDA requested by WDOH. Monitoring reported in Annual IPTRAEU Report. Smear survey of exhaust port taken. Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
actual emissions reporting, nondestructive assay, record sampler, or continuous air monitoring, whichever is more appropriate.		
The facility must be able to demonstrate that workers associated with this emission unit are adequately trained in the use and maintenance of emission control and monitoring systems, and in the performance of associated test and emergency response procedures (WAC 246-247-075(12)).	Continuous	<p>CDM: Training records and/or training program.</p> <p>Comment:</p>
The facility must be able to demonstrate the reliability and accuracy of emission data and other test results from this unit (WAC 246-247-075(13) and WAC 246-247-075(6)). The facility must be able to demonstrate that it has a quality assurance program compatible with applicable national standards listed in, or equivalent to, those listed in the above cited regulation.	Continuous	<p>CDM: HNF-EP-0528, Rev. 4, "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions."</p> <p>Comment:</p>
The department reserves the right to inspect and audit this unit during construction and operation, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
The department may require an ALARACT demonstration at any time (WAC 246-247-080(1)).	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
All reports and records must be kept and reported according to 40 CFR 61, Subpart H (WAC 246-247-080(2)).	Continuous	<p>CDM: For calculations and input data from stack and ambient air monitors, the ERS electronic system. Information from other than stacks and ambient air monitors resides at the individual facility. For annual reporting, DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
All measured or calculated emissions must be reported annually (WAC 246-247-080(3)).	Continuous	<p>CDM: DOE/RL-2003-19, Revision 0, "Radionuclide Air Emissions Report for the Hanford Site, Calendar Year 2002."</p> <p>Comment:</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any standards or limitations in the license or that lasts more than four hours, it must be reported to the department within 24 hours.</p> <p>Applicable standards (WAC 246-247-040) include unit specific emission limits (paragraph 5), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: There were no unexpected releases of radioactivity or shutdowns. No reports were required.</p>
Records must be readily (promptly) available for this unit. Those records must be maintained onsite, and must be retained for at least five years (WAC 246-247-080(8)).	Continuous	<p>CDM: Records verification.</p> <p>Comment: Records maintained according to records management system and administrative procedure.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance to have reasonable time to meet the requirements.</p>	Continuous	<p>CDM: "Memorandum Of Understanding For Initial Point Of Contact Activities Supporting Regulatory Agency Environmental Inspections", dated July 2001, satisfies this condition.</p> <p>Comment:</p>
The facility shall make requested documents available in a timely manner for review (WAC 246-247-080(10)).	Continuous	<p>CDM: Records review.</p> <p>Comment: WDOH requested information and records during the 2 Level II stack inspections. Requested records were promptly supplied.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>The abated dose limit for this NOC shall not exceed 1.91E-05 mrem/yr to the MEI.</p>	<p>Continuous</p>	<p>CDM: Smears of exhaust port showed no radionuclides.</p> <p>Comment:</p>
<p>The approved process is limited to the following: 1. Type I units that are vacuums and are to be used as ventilation units. If the vacuum is used in any other manner WDOH must approve its use under a separate application before the activity commences. 2. Type II units decrease the chance of unintentional cross contamination and are sample preparation units. These units enable the removal of material from core barrels, homogenize the material, and fill prescribed sample containers for onsite and offsite analysis. 3. Type III units are used for sample screening and analysis and provide preliminary screening of samples to determine potential problem areas. They also screen samples requiring further in depth analysis. The source of radionuclides handled by the mobile sample preparation facilities and mobile screening and analysis facilities is contaminated soils and/or liquids extracted from cribs, ditches, ponds, burial sites, and other such areas with surficial soil contamination. An additional source of radionuclides is the preparation of radioactive standards to be used for instrument calibration.</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.</p>
<p>The required controls are as described as follows: Type I units shall be equipped with a HEPA Filter. Some also will be equipped with an additional HEPA Filter in series, charcoal absorbers, or moisture separators. Type II and Type III have an exhaust system consisting of a single stage HEPA filter followed by an activated charcoal absorber.</p>	<p>Continuous</p>	<p>CDM: Verified by walk down.</p> <p>Comment:</p>
<p>The required possession quantity is RHL's calculated for a daily use because many of the activities are of short duration. In calculating the RHL's, 0.1 mrem per year criteria will be used as a beginning point and the source term, which can be handled each day, is back calculated.</p>	<p>Intermittent</p>	<p>CDM: Records review.</p> <p>Comment: RHL calculations are not being tracked in all cases.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
Ductwork, seams, and potential release locations on the portable exhauster are to be monitored on a routine basis for potential radionuclide releases and noted on the log sheets (e.g., post-survey results negative). These routine checks should be kept as retrievable records.	Continuous	CDM: Field interview and/or operation logs. Comment:

NOC: Use of Portable/Temporary Radionuclide Airborne Emissions Units, Rev 2 **Permit:** RTAM
Date: 02-15-2000 **NOC ID:** 426 **Date In AOP:** 07-02-2001

WDOH Conditions	Comp. Status	Compliance Determination Method
A copy of the log will be submitted annually to the WDOH on June 30. The June submittals will consist of PTRAEU operations from January through December for the previous year. The estimated emissions from the units will be reviewed as directed by DOE/RL and summarized in the annual radioactive air emissions report for the Hanford Site.	Continuous	CDM: Annual PTRAEU Report Comment: The required Annual PTRAEU Report was submitted on by June 30.

Emission Unit : (Sitewide) Vented Containers

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 448

Page in AOP: 2-207

(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: Environment Sampling Sampling Frequency: Air-every 2 weeks continuous/deposition - annually Radionuclide Requiring Measurement: TOTAL ALPHA/TOTAL BETA	Continuous	CDM: Sampling is verified by information in ABCASH. The "Statement of Work for Services Provided by the Waste Sampling and Characterization Facility for the Environmental Compliance Program during Calendar Year 2002" (HNF-EJ ^P -0835-8) defines what analyses are performed and the frequency. The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-E ^P -0528, Rev. 4) specifies the QA requirements. Comment:

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Federal and State Regulatory Requirement: 40 CFR 61.93(b)(4)(i) & WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114(3)	Continuous	CDM: The "NESHAP Quality Assurance Project Plan for Radioactive Air Emissions" (HNF-EP-0528, Rev. 4) specifies the QA requirements. Comment:

NOC: Vented Container Storage **Permit:** Shortform Approval **Date:** 09-19-1996 **NOC ID:** 188
Date In AOP: 07-02-2001 **Date Obsolete:** 12-13-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
Establishes a categorical As Low As Reasonably Achievable Control Technology (ALARACT) demonstration for existing Hanford Site vented containers.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Establishes a categorical Best Available Radionuclide Control Technology (BARCT) demonstration for all future Hanford Site vented containers (i.e. up to 10,000 vented container units (UVC) based on total unabated emissions and 27,000,000 UVC based on total abated emissions offering less than 0.1mrem/yr to the MEI).	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Pu239/240 equivalent curies (PE-Ci) represents the radionuclide of concern as discussed in the Hanford Site Solid Waste Acceptance Criteria, WHC-EP-0063, 1994, Westinghouse Hanford Company, Richland Washington.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The vented container Lat and Longitude coordinates (46 degrees 22' 13.8", 119 degrees 16' 12.3") refer to the location resulting in the highest impact to the MEI.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

WDOH Conditions	Comp. Status	Compliance Determination Method
The estimated unabated and abated TEDE to the MEI per container is 1.5 E-5 and 5.1 E-9 mrem/yr, respectively.	Continuous	CDM: Review of notice of construction application. Comment:
WDOH accepts vent clips as ALARACT since they are no longer installed.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
The annual possession quantity for each vented container varies. The maximum quantity per container is based on preventing nuclear criticality, which is managed by: (i)controlling the amount of fissionable material in each container, (ii)container spacing requirements, (iii)container segregation. The annual possession quantity for this categorical approval is accepted due to the variability of waste types.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
NucFil(TM) filter or an equivalent filter shall be BARCT, and ALARACT. Vent clips are accepted as ALARACT for existing systems to date, however when conditions require repackaging vent clips shall be replaced by NucFil(TM) or equivalent filters.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
These containers are used for storing mixed and or radioactive waste generated on or off Hanford Site.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.
Containers other than drums are also approved if they meet the conditions of this NOC.	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency.

Emission Unit : (200) 200 Area Diffuse/fugitive

Compliance Status Report Period : January 1, 2002 through December 31, 2002

WDOH Emission Unit ID: 486

Page in AOP: 2-208

(No WDOH Abatement Controls records were found.)

WDOH Monitor Condition	Comp. Status	Compliance Determination Method / Comments
Required Sampling: There are no sampling requirements. Sampling Frequency: NA Radionuclide Requiring Measurement: All radionuclides which could contribute 10% of the potential EDE.	Not Applicable	CDM: N/A. Comment: None listed in the Permit.
Federal and State Regulatory Requirement: WAC 246-247-075(3) Permit Monitoring and Testing Procedure: Appendix B, Method 114	Not Applicable	CDM: N/A. Comment: None listed in the Permit.

NOC: Installation of the Liquid Effluent Transfer System, Rev 0 Permit: AIR 00-706 Date: 07-24-2000
NOC ID: 487 Date In AOP: 07-02-2001 Date Obsolete: 10-15-2002

WDOH Conditions	Comp. Status	Compliance Determination Method
U.S. DOE shall comply with all Conditions and Limitations of this NOC (WAC 246-247-060(5)).	Not Applicable	CDM: Refer to other conditions for applicable Compliance Determination Method. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.
These conditions and limitations must be proceduralized prior to the implementation of this NOC.	Not Applicable	CDM: CH2M HILL work package. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.
This approval with its conditions and Limitations must be included in the next revision of the Hanford Air Operating Permit (WAC 246-247-060(1)(e) and (2)(c)).	Not Applicable	CDM: Placed into the Hanford Air Operating Permit, June 2001, Ecology Publication Number 00-05-006. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.
The licensed emissions allowed by this approval are only those associated with the construction activities related to the installation of the Liquid Effluent Transfer System (LETS) and its tie-ins to the Liquid Effluent Retention Facility	Not Applicable	CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be

WDOH Conditions	Comp. Status	Compliance Determination Method
(LERF) and the PC5000 waste transfer line.		completed in the future, or that pertain to actions required of the agency. This NOC was inactive in 2002 and was closed October 15, 2002.
<p>This license does not provide the operating approval that shall be required prior to use of the LETS by the LERF and the Treatment and Immobilization Facility (Vitrification Plant). The LETS shall be dependent on the operation of the Vitrification Plant and its use shall be addressed in the permitting documentation for this facility. As there are no emission points along the transfer piping, the potential new emissions shall add potential to emit to LERF, which shall also require modification approval prior to its use of LETS. The LETS shall also provide tie-in to waste water feed line to the 200 Area Treated Effluent Disposal Facility (TEDF), from the Vitrification Plant. This NOC does not request that TEDF be a registered emission unit, nor to be allowed to receive radioactive potential-to-emit. This condition shall be associated with the LEF and the Vitrification Plant for the Hanford Air Operating Permit until the appropriate permitting revisions and approvals for the operation of the LETS are obtained (WAC 246-247-060(1)(e) and (2)(c)).</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. This NOC was inactive in 2002 and was closed October 15, 2002.</p>
<p>If the department finds that the emission unit described in this NOC is not in compliance with the standards in WAC 246-247-040 during construction , the department reserves the right to require modifications to bring it into compliance (WAC 246-247-060(2)(d)).</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. This NOC was inactive in 2002 and was closed October 15, 2002.</p>
<p>The department reserves the right to inspect and audit this unit during construction, including all activities, equipment, operations, documents, data, and other records related to compliance with the regulations (WAC 246-247-080 (1)).</p>	Not Applicable	<p>CDM: N/A.</p> <p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. This NOC was inactive in 2002 and was closed October 15, 2002.</p>
The department may require an	Not	CDM: N/A.

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>ALARACT demonstration at any time (WAC 246-247-080(1)).</p>	<p>Applicable</p>	<p>Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. This NOC was inactive in 2002 and was closed October 15, 2002.</p>
<p>All reports and records must be kept and reported according to 40 CFR 61, Subpart H. (WAC 246-247-080(2)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records management.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>For this activity the estimated emission levels are too low to measure using conventional stack sampling methods. The emissions of this NOC are based on and calculated from a maximum threshold contamination levels and a maximum volume of contaminated soil. For the reporting requirements of WAC 246-247-080(3), all results of the contamination surveys must be kept on file as confirmation of low emissions and a verification of low contamination levels, and thus low emissions, shall be reported annually in the Hanford Site Air Emissions Report.</p>	<p>Not Applicable</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>If there is an unexpected release of radioactivity or if there is a shutdown or other condition that, if it were allowed to persist, would result in emissions of radionuclides in excess of any Conditions or Limitations in this NOC approval or that lasts more than four hours, it must be reported to the department within 24 hours. Applicable standards(WAC 246-247-040) include unit specific emission limits (paragraph 5), the offsite dose standard(paragraph 1), BARCT (paragraph 3) or ALARACT (paragraph 4), whichever is applicable, or any limitations included in this approval (paragraph 5).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL notification procedures and notification logbook.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>The facility must maintain a log in an approved format for this activity to track the total volume of contaminated soil (to ensure that the contaminated soil volumes in conjunction with their respective contamination levels do not</p>	<p>Not Applicable</p>	<p>CDM: N/A.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>exceed the approved estimated potential-to-emit). This amount is an important factor in the approved method to verify the low emissions for this activity.</p>		
<p>All records required by WAC 246-247 must be retrievable within 24 hours of the request, and must be stored onsite. All records shall be maintained for a minimum of five years (WAC 246-247-080(8)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records management. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>This unit must be fully accessible to Department of Health inspectors. If there are any specific training requirements or have restrictions or special requirements for entry, they must be given to the department when they are known to allow for unannounced inspections, as required by EPA (WAC 246-247-080(9)). At a minimum, for unannounced inspections, such requirements or restrictions must be told to inspectors that morning, with the opportunity for the inspectors to meet those requirements. For prior announced inspections, such notification must occur far enough in advance for the inspectors to have reasonable time to meet the requirements.</p>	<p>Not Applicable</p>	<p>CDM: N/A. Comment: Ecology and WDOH have determined that the licensee need not certify compliance with conditions that convey a right, that are a historical summary or fact that pertain to actions to be completed in the future, or that pertain to actions required of the agency. This NOC was inactive in 2002 and was closed October 15, 2002.</p>
<p>The facility shall make requested documents available for timely review (WAC 246-247-080(10)).</p>	<p>Not Applicable</p>	<p>CDM: CH2M HILL records management Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: Controlled use of the Guzzler Vacuum Excavation System for radiologically activities shall meet the conditions, controls, monitoring requirements and limitations of "Guzzler Vacuum Excavation System for Radiologically Limited Activities on the Hanford Site" approval letter # AIR 98-1215, dated December 18, 1998; or the latest approved version for this emission unit.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: After backfilling, the area shall be surveyed to verify that</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>radiological contamination levels on the soil surface are less than 5,000 dpm/100 cm² beta-gamma and less than 100 dpm/100 cm² alpha. If contamination is present on the surface above these levels, it will be removed and containerized for disposal or covered or fixed to provide containment of the contamination.</p>		<p>the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: As the potential unabated offsite dose associated with this activity is calculated to be less than 0.1 millirem per year, in accordance with 40 CFR 61, Subpart H, periodic confirmatory measurements (PCM) shall be made to verify emissions. The PCM shall consist of the radiological soil contamination surveys. Soil surveys for radioactive contamination will be performed for beta/gamma. If beta/gamma contamination is detected, surveys for alpha contamination will also be performed. This method of PCM is intended to demonstrate that compliance can be maintained administratively as the performed surveys shall limit activities with a potential-to-emit below the maximum threshold contamination work levels. As the emission estimates are based and calculated from the maximum threshold contamination levels and the maximum volume of contaminated soil, the true emissions shall inherently be below the estimated emissions.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: During tie-in activities, if removable contamination levels around the flange after reduction efforts are greater than 10,000 dpm/100 cm² beta gamma and 200 dpm/100 cm² alpha, the work shall be performed in a glove bag.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: If a Portable/Temporary Radioactive Air Emission Unit (PTRAEU) is used during tie-in activities, the conditions, controls, monitoring requirements and limitations of (PTRAEU), Revision 2" approval letter # AIR 99-1102, dated November 4, 1999, shall be required; or the latest approved version for this emission unit.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews. Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>

WDOH Conditions	Comp. Status	Compliance Determination Method
<p>Construction and tie-in condition or limitation: If a HEPA Filtered Vacuum Radioactive Air Emission Unit (HEPA VAC) is used during tie-in activities, the conditions, controls, monitoring requirements and limitations of the HEPA VAC, Revision 1," approval letter # AIR 99-1103, dated November 4, 1999, shall be required; or the latest approved version for this emission unit.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: The following radionuclides are allowed by this approval and may also contribute to the gross alpha and gross beta-gamma measurements (conservatively represented by Sr-90 and Am-241 estimate): H-3, C-14, Co-60, Se-79, Sr-90, Nb-94, Te-99, I-129, Cs-134, Cs-137, Ce-144, Eu-155, Ra-226, U-234, Np-237, Pu-238, Pu-239, Pu-241, Am-241, Cm-244. If any other radionuclides are suspected or verified through soil analysis the department must be notified.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: Source term contribution is limited from the Guzzler at: 1.92 E-01 curies Sr-90, and 1.28 E-03 curies Am-241. Source term contribution from conventional excavation is limited to: 6.3 E-02 curies Sr-90, and 1.46 E-03 curies Am-241. Total source term contribution is limited to 2.55 E-01 curies Sr-90 and 2.74 E-03 curies Am-241.</p>	<p>Not Applicable</p>	<p>CDM: Field interviews.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>
<p>Construction and tie-in condition or limitation: The abated dose limit for this NOC shall not exceed 5.1 E-02 mrem/yr to the MEI, 15,990 meters east-southeast at Energy Northwest (CAP88 run for a new MEI location) and 6.37 E-02 mrem/yr to the MEI at 20,000 meters east-southeast (using dose conversion factors HNF-3602, Volume 1: Calculating Potential to Emit releases and Doses for FEMPs and NOCs, July 1999, J.S. Hill, P.D. Rittman, Fluor Daniel Hanford, Inc., Richland, Washington.</p>	<p>Not Applicable</p>	<p>CDM: The annual Radionuclide Air Emissions Report for the Hanford Site scheduled for submittal on June 30, 2003.</p> <p>Comment: The emission unit did not operate during the period of January 1 - October 14, 2002 and the NOC was officially closed October 15, 2002.</p>