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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 8, 2003

Ms. Laurie Kral
Office of Air Quality Program
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Andy Ginsburg, Administrator
Air Quality Division
Oregon Department of Environmental Quality
811 SW Sixth Avenue
Portland, Oregon 97204

Mr. Gary Burke, Chairman
Confederated Tribes of the Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

Mr. Russell Jim
Yakama Indian Nation
P.O. Box 151
Toppenish, Washington 98948

Dear Ms. Kral, Messrs. Ginsburg, Jim, and Burke:

Re: United States Environmental Protection Agency (EPA) and Affected State
Notification of Significant Modification to the Hanford Site Title V Air Operating
Permit (AOP)

Enclosed for your review is the notification of significant modification request to the Hanford Site Title V AOP pursuant to Washington Administrative Code (WAC) 173-401-725(4). This submittal contains a request for downgrading Stack 200E P-244A-001 (296-A-25) from a major point source to a minor point source. The attachment provides the United States Department of Energy's (USDOE) application document and requested changes.

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Ms. Kral, Messrs. Ginsburg, Jim, and Burke

December 8, 2003

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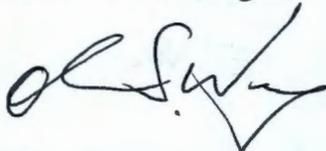
The Washington State Department of Ecology and the Washington State Department of Health have reviewed this application and consider it complete. All WAC 401-725(4) requirements will be followed for review and issuance of this significant modification. The public participation and comment period will start on January 10, 2004, for at least 30 days, in accordance with WAC 173-401-800 to 820.

If you have any questions regarding this notification and request for review, please contact Oliver Wang of my staff at (509) 736-3040.

Sincerely,



Michael Wilson
Program Manager
Nuclear Waste Program



Oliver Wang
Professional Engineer
Nuclear Waste Program

OW:nc

Attachment: USDOE's Application for Significant Modification.

cc w/ attachment:

Mary Jarvis
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Dennis Bowser
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Bill Green
Fluor Hanford
P.O. Box 1000, MSIN: N1-25
Richland, Washington 99352

Barry Curn
Bechtel National
2435 Stevens Center Place, MSIN: S6-M1
Richland, Washington 99352

Ms. Kral, Messrs. Ginsburg, Jim, and Burke
December 3, 2003
Page 3

Joan Woolard
Bechtel Hanford, Inc.
3350 George Washington Way
Richland, Washington 99352

Brad Atencio
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: P7-68
Richland, Washington 99352

Roy Evans
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504-7827

John Schmidt
Washington State Department of Health
309 Bradley Boulevard, Suite 201
Richland, Washington 99352

cc w/o attachment:

Joel Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-58
Richland, Washington 99352

Douglas Hardesty
Office of Air Quality Program
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Al Conklin
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504-7827

Pat Sobotta
Nez Perce Tribe
P.O. Box 365
Lapwai, Idaho 83540

Chris Kemp
CH2M Hill Hanford Group
P.O. Box 1500, MSIN: R1-51
Richland, Washington 99352-1505

John Mattell
Washington State Department of Health
309 Bradley Boulevard, Suite 201
Richland, Washington 99352

Sarah Clark
Washington State Department of Health
P.O. Box 47827
Olympia, Washington 98504-7827

Administrative Record: Hanford AOP

Ken Niles
Oregon Office of Energy
625 Marion Street NE
Salem, Oregon 97301

Permit Register-Washington State
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Stuart Harris
Confederated Tribes of the Umatilla
Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

Todd Martin
Hanford Advisory Board
1933 Jadwin Avenue, Suite 135
Richland, Washington 99352

Attachment

DOE's application for significant modification

(Consisting of 14 pages, including this sheet)



U.S. Department of Energy

Office of River Protection

P.O. Box 450
Richland, Washington 99352

Olwen
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NOV 24 2003
Department of Ecology
NWP - Kennewick

03-ED-168

NOV 20 2003

Addressees – See Attached

Central Files
File Name: _____
Cross Reference: _____

Dear Addressees:

REQUEST FOR SIGNIFICANT MODIFICATION TO THE HANFORD SITE TITLE V AIR OPERATING PERMIT (AOP) (NUMBER 00-05-006), DOWNGRADE OF STACK 200E P-244A-001 (296-A-25)

This letter requests the State of Washington Department of Health (WDOH) and the State of Washington Department of Ecology (Ecology) process, as listed below, Attachments 1, 2, and 3.

Attachment 1 – WDOH: “Report of Closure/Permit Revision for the (200E) P-244A-001 (296-A-25) Stack.” This stack is a Federal Facility Compliance Act stack, which was previously scheduled for upgrade by April 30, 2006, per the subject Air Operating Permit (AOP). This upgrade is no longer necessary, as the stack will not be operated as a major emission point.

Attachment 2 - WDOH and Ecology: “Hanford Site Title V Air Operating Permit Significant Modification Request Permit 00-05-006,” pursuant to Washington Administrative Code (WAC) 173-401-725(4). The Significant Modification request package contains a change in the status of emission unit 200E P-244A-001 from a major point source to a passive minor point source. Specifically the requested changes are as follows:

- Remove emission unit 200E P-244A-001 (Emission Unit ID 222) from the AOP Attachment 2, Table 1.1, Page 2-29;
- Update AOP Attachment 4, Pages 4-2 through 4-8 with a new National Emission Standards for Hazardous Air Pollutants quarterly status report;
- Add emission unit ID 738 to AOP Attachment 2;
- Change sampling frequency to once per year;
- Change “Radionuclide Requiring Measurement” to levels below 10,000 dpm/100cm²beta/gamma and 200 dpm/100cm²alpha to verify low emissions;
- Change “Monitoring and Testing Procedure” to no requirement;
- Change “Federal and State Regulatory Requirements” to WAC 246-247; and
- Addition of “Sampling Requirements” to the Personnel Contamination Monitor will be a smear survey on the inside surface of the ducting and downstream of the HEPA filter or on the outside of the screen covering the outlet of the vent.

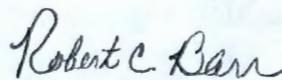
NOV 20 2003

Attachment 3 – Ecology: “Notification of Permit Modification Request to the U.S. Environmental Protection Agency, Region 10 (EPA), the Tribes, and Affected States.” The AOP modification process for a Significant Modification is contained in WAC 173-401-725(4). According to this process, Ecology will be responsible for the following:

- Provide EPA a copy of the permit application;
- Maintain and update the permit register;
- Prepare and publish public notices and/or public hearings;
- Conduct 30-day public and affected states review period;
- Respond to any public and affected states’ comments, prepare responsiveness summary, and revise the application accordingly;
- Provide Permit Modification to EPA for 45-day review;
- Issue Permit Modification within 15 days after EPA review/approval, or deny the change; update and publish modified AOP as required; and
- Complete review on the majority of significant AOP modifications within nine months after receipt of a complete application.

If you have any questions, please contact me, or your staff may contact Dennis W. Bowser, Environmental Division, (509) 373-2566.

Sincerely,



Roy J. Schepens
Manager

ED:DWB

Attachments: (3)

cc: See page 3

Addressees
03-ED-168

-3-

cc w/attachs:

C. J. Kemp, CH2M HILL

J. J. Luke, CH2M HILL

L. L. Penn, CH2M HILL

S. M. Wells, CH2M HILL

S. Harris, CTUIR

O. S. Wang, Ecology

W. E. Green, FHI

P. Sobotta, NPT

J. W. Schmidt, WDOH

Administrative Record

Environmental Portal, LMSI

Addressees
03-ED-168

-4-

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

Mr. Jeff KenKnight, Unit Manager
Office of Air Quality
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, OAQ-107
Seattle, Washington 98081

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

Attachment 1
03-ED-168

**Report of Closure/Permit Revision for the
(200E) P-244A-001 (296-A-25) Stack**

Report of Closure/Permit Revision

NOTE: Any increase to abated or unabated PTE requires a full NOC modification

REASON FOR CHANGE

Submittal Date: 10/3/03

Submittal Type: Letter Submittal

NOC Application Revision

New NOC Rev Number: NA

Condition Change/ Clarification

WDOH Condition Number: NA

AOP Condition Number: NA

ALARACT Revision

New ALARACT Rev Number: NA

(NEW ALARACT Number will be assigned by WDOH)

PROJECT IDENTIFICATION

Project Title: 244-A Lift Station Stack Closure

Current NOC Application Numbers: _____

AEI ID Number (AOP Emission Unit Number(s)): (200E) P-244A-001

Current WDOH Approval Letter Number(s): AIR 99-115

WDOH NOC ID Number: Emission Unit ID 222

DESCRIPTION OF CHANGE

Number of Attachments 0

Closure of (200E) P-244A001, 244-A Stack (296-A-25) (Emission Unit ID 222)

Summary/ Introduction

In accordance with the Washington Administrative Code 246-247-080(6), this report of closure is required to be submitted to the Washington Department of Health (WDOH) documenting the cessation of operations producing emission at any radioactive airborne emission unit.

The closure of the stack was done per AIR 03-611 which closes the stack emission unit ID 222. The field work portion for the installation of the ventilation breather filter on 296-A-25 emission unit ID 486 on AIR 03-611 page 2 and 3 is complete September, 2003. The emission unit for the 244-A HEPA filter bank and the field work for closing the 296-A-25 stack is emission unit ID 486. The HEPA filter for 244-A is now passively ventilated using emission unit ID 738.

This serves as a report of closure for the (200E) P-244A001 stack (296-A-25) used to ventilate the 244-A Catch Tank [previously referred to as a double-contained receiver tank (DCRT) of the 244-A lift station]. The 296-A-25 stack is isolated (inlet and outlet capped), the stack exhaust fan electrical power is disconnected and the fan housing is isolated (inlet and outlet capped), the stack drain is removed and plugged, electrical power to all associated ventilation monitoring equipment and alarms is disconnected, the continuous air monitor (CAM) and sample pumps are removed, the old annulus inlet filter is blanked and abandoned in place, the HEPA filter banks in the Filter Pit are removed and replaced with a duct jumper to support passive breathing, and a

passive (atmospheric) HEPA breather filter assembly is attached to the catch tank duct piping and another to an annulus space. The stack and monitoring equipment are no longer needed for operations. The following information is provided in this document:

- Date of closure
- Remaining material
- Assessment of potential continued emissions
- Future Plans
- Emissions Control and Monitoring
- Deletes the Abatement Technology, Monitoring Requirements, and Sampling Requirements AOP conditions (identified in the Hanford Air Operating Permit) for this emission unit.

1. Date of Closure

The 200E P-244A001 (296-A-25) stack is no longer operationally needed and has been isolated and de-energized and will not be used for 244-A operations. Field activities on the ventilation modifications were completed September, 2003. The closure date is the submittal date of this closure report.

2. Remaining Material

The remaining 244-A ventilation system material is the stack and exhaust fan (contaminated surfaces on their interiors). The old HEPA filter banks in the Filter Pit are removed and replaced with a duct jumper to support passive ventilation of the catch tank. The old annulus inlet filter is abandoned in place and the inlet riser is blanked closed.

3. Assessment of Potential for Continued Emissions

There is no potential for release based on the following:

- a) The electrical power to the stack exhaust fan is disconnected.
- b) The stack exhaust fan is isolated – the inlet and outlet are capped.
- c) The stack is isolated – the inlet and outlet are capped.
- d) Fugitive emissions cannot be released from the stack.
- e) A passive HEPA filter breather system is attached to the catch tank duct piping and another to the annulus riser.

4. Future Plans

There are no future plans to use the stack.

5. Emissions Control and Monitoring

Emissions control and monitoring is not required for the inactive and isolated 244-A filter bank connected to the 296-A-25 stack. The emission controls and monitoring systems are inactive and have been isolated or removed. Fugitive emission monitoring, in support of the Hanford Site

ambient air-monitoring program, which is described in the annual Radioactive Airborne Emissions Report, continues within the Hanford 200 Areas and includes the tank farms.

6. Deletes the Abatement Technology, Monitoring Requirements and Sampling Requirements AOP conditions for this emission unit

This emission unit is listed in the AOP, Attachment 2, Table 1.2, Requirements for major point sources, emission unit name: 200E P-244A-001, Emission Unit ID 222. Delete the AOP conditions for Abatement Technology and Monitoring Requirements for the emission unit found on page 2-29 of the AOP.

SIGNATURES

Reviewed by Contractor	Reviewed by RL/ORP	Approved by WDOH
C.J. Kemp <i>CJK</i>	D.W. Boyser <i>DW Boyser</i>	A.W. Conklin
Date: 11-6-03	Date: 11/14/03	Date:

FOR WDOH USE ONLY

Data Entry Completed By: _____ Date: _____

Attachment 2
03-ED-168

**Hanford Site Title V Air Operating Permit Significant
Modification Request Permit 00-05-006**

HANFORD SITE AIR OPERATING PERMIT

Significant Permit Modification Request

Permit Number 00-05-006

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

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

Emission point identification and description of the change:

See Attachment 2, page 2-29 of the revised Air Operating Permit (AOP).

Describe the emissions resulting from the change:

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

Describe the new applicable requirements that will apply as a result of the change: (To be provided in the agency approval order.)

- Remove Emission Unit 200E P-244A-001 (Emission Unit ID 222) from the AOP Attachment 2, Table 1.1, page 2-29.
- Update AOP Attachment 4, pages 4-2 through 4-8 with a new National Emission Standards for Hazardous Air Pollutants quarterly status report.
- Add Emission Unit ID 738 to AOP, Attachment 2.
- Change sampling frequency to once per year.
- Change "Monitoring and Testing Procedure" to no requirement.
- Change "Federal and State Regulatory Requirements" to WAC 246-247.
- Perform periodic confirmatory measurements annually and use a confirmation level below 10,000 dpm/100cm² beta/gamma and 200 dpm/100cm² alpha to verify low emissions on the passive breather filter outlet.

Suggested Draft Permit Language:

for example:

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

CERTIFICATION

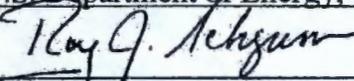
Provide certification pursuant to (WAC 173-401-520)

I certify that based on information and belief formed after reasonable inquiry of the person or persons who perform activities, or those persons directly responsible for gathering the information, the statements and information provided in this modification request are true, accurate, and complete.

Responsible Official: Roy J. Schepens

Title: Manager

U.S. Department of Energy, Office of River Protection

Signature: 

Date: 11/20/03

For Hanford Site Use Only:

AOP Change Control Number:

Date Submitted:

**Attachment 3
03-ED-168**

**Notification of Permit Modification Request to the
U.S. Environmental Protection Agency, Region 10,
The Tribes, and Affected States**

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

Attached is a request to revise the Hanford Site Air Operating Permit (AOP). This form serves as a notification of a request for an AOP modification to the U.S. Environmental Protection Agency (EPA), tribes, and affected states per Washington Administrative Code (WAC) 173-401-725(2), (3) and (4).

Air Operating Permit Number: 00-05-006	
Source: U.S. Department of Energy, Office of River Protection Richland Operations, Hanford Site	
Mailing Address: P.O. Box 450 Richland, WA 99352-0450	Physical Address: 2440 Stevens Drive Richland, WA 99352
Brief Description: This application describes the changes to the 200E P-244A-001 (296-A-25) stack closure effort and changes the monitoring requirements for the closed stack per AIR 03-611 to as follows: <ul style="list-style-type: none"> • Remove Emission Unit (200E) P-244A-001 (Emission Unit ID 222) from the AOP, Attachment 2, Table 1.1, page 2-29. • Update AOP Attachment 4, pages 4-2 through 4-8 with a new National Emission Standards for Hazardous Air Pollutants quarterly status report. • Add Emission Unit ID 738 to AOP Attachment 2. • Change sampling frequency to once per year. • Perform periodic confirmatory measurements annually and use a confirmation level below 10,000 dpm/100cm² beta/gamma and 200 dpm/100cm² alpha to verify low emissions on the passive breather outlet. • Change "Monitoring and Testing Procedure" to no requirement. • Change "Federal and State Regulatory Requirements" to WAC 246-247. 	
Contact Name: Roy J. Schepens	Phone: 509-376-6677
Title: Manager Office of River Protection, U.S. Department of Energy	
FOR ECOLOGY USE ONLY	
Application Number	Date Received
Ecology Contact	
Date of Publication in Permit Register	Public Comment Period Ends