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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

December 13, 1993

Mr. James D. Bauer
Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Bauer:

Re: Notice of Construction (NOC) Permit for Nonradioactive Air Emissions
From the Waste Receiving and Processing Facility (WRAP 1 Facility)

Your application to construct and operate the WRAP 1 Facility at the Hanford Site was received by the Department of Ecology's Nuclear and Mixed Waste Management Program on April 2, 1993.

We have held two review meetings with your and Westinghouse staff at Ecology's Northwest Regional Office on May 12 and September 8, 1993, for discussing the staff's comments on the application and the draft NOC permit.

The approval of this application is attached for your use. Failure to meet the approval conditions may result in the revocation of this permit, the issuance of Notices of Violation, the imposition of civil penalties, and other civil or criminal actions as provided for in Chapter 70.94 RCW.

If you or your staff have any questions regarding this permit, please call me at (206) 407-7147.

Sincerely,

Robert C. H. King, P.E.
Chemical Engineer
Nuclear and Mixed Waste Management Program

cc: Steve Stites, USDOE
Alice Coenberg, WHC



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DEC 16 1993
194-RPS-125
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1 WASHINGTON DEPARTMENT OF ECOLOGY
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 3 OLYMPIA, WASHINGTON 98504-7600
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8	IN THE MATTER OF:]	NO. NOC-93-05
9]	APPROVAL OF NOC
10	United States Department of Energy]	APPLICATION FOR
11	Waste Receiving and Processing Facility]	NONRADIOACTIVE AIR
12	Richland, Washington]	EMISSIONS

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 15 On April 2, 1993 the United States Department of Energy (Energy) submitted a Notice of Construction
 16 (NOC) application to construct a new air emission unit - the Waste Receiving And Processing Module 1
 17 (WRAP 1) Facility. The WRAP 1 facility will be located in the 200 West Area of the Hanford Site,
 18 south of 23rd Street and west of Dayton Avenue.

19 DESCRIPTION

- 20 1. The WRAP 1 facility will be housed in a new 51,300 square feet metal building consisting of
 21 pre-insulated, pre-finished metal, interlocking roof and wall sandwich panels. WRAP 1 will
 22 provide waste handling areas, support areas, mechanical areas, electrical areas, heating,
 23 Ventilation, and Conditioning (HVAC) equipment, and administrative areas all located on the
 24 43,700 square feet main floor; with a control room, computer room, and the non-radiological
 25 HVAC equipment located on the 7,600 square feet second floor.
- 26 2. The solid wastes to be handled in the WRAP 1 facility include low level waste (LLW),
 27 transuranic (TRU) waste, and transuranic and low level mixed wastes (LLMW). The WRAP
 28 1 facility will only accept contact handled (CH) waste containers. Contact handled waste is a
 29 waste category whose external surface dose does not exceed 200 mrem/hr.
- 30 3. The primary function of WRAP 1 will be to handle CH wastes in 55 gal drums. This will
 31 include approximately 38,000 retrieved drums containing suspect TRU waste that were placed
 32 in storage beginning in 1970 (called retrieved waste). The secondary function will be to
 33 examine and assay newly generated CH waste in boxes up to 8 ft long by 5 ft wide by 5 ft

34 high. WRAP 1 will contain equipment necessary for non-destructive examination (NDE) of
35 wastes and to perform a non-destructive examination assay (NDA) of the total radionuclide
36 content of the wastes, without opening the outer container.

- 37 4. The general arrangement floor plan for WRAP 1 is composed of the following areas: 1)
38 Shipping and Receiving, 2) NDE and NDA, 3) Waste Processing, and 4) Ancillary Support.
39 Because drums are only opened in gloveboxes, which are located in the waste processing area,
40 the airborne contaminants released at WRAP 1 are expected to be in these gloveboxes. The
41 processing area consists of four glovebox lines: a Transuranic (TRU) Waste Process glovebox,
42 a TRU Restricted Waste Management (RWM) glovebox, a LLW Process glovebox, and a
43 LLW RWM glovebox.
- 44 5. Ventilation exhaust points at the WRAP 1 facility can be divided into two general categories;
45 the exhaust stack (46 ft high) and miscellaneous vents. The exhaust stack will be the emission
46 point for ventilation Zone I (gloveboxes) and ventilation Zone II (rooms in which gloveboxes
47 and Zone I ventilation equipment are located).

48
49 Pursuant to the Washington State regulations for the Notice of Construction (NOC) set forth in Chapter
50 173-400 WAC and Chapter 173-460 WAC, the new source review sections- WAC 173-400-110 and
51 173-460-040 and based upon the complete NOC application submitted by Energy, the Department of
52 Ecology (the department) hereby approves the application subject to the following conditions:

53 CONDITIONS

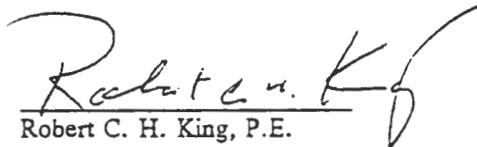
- 54 1. The exhaust stack height of the WRAP 1 facility shall be at least 46 feet high with a 32-inch
55 circular cross section. Opacity from the stack shall not exceed 5 percent as measured by EPA
56 Reference Method 9 as described in 40 CFR Part 60, Appendix A, dated July 1, 1992.
- 57 2. After start-up of the facility, Energy shall conduct performance tests for particulates. Energy
58 also shall conduct stack emission tests for VOC. After these tests, the department may require
59 Energy to conduct an annual test(s) for those pollutants. Energy shall submit a test plan for

60 department's approval at least 45 days before the testing. Energy and the department shall
61 meet before the testing occurs to discuss test protocol. Testing shall occur only after the
62 department approves the plan. Energy shall notify the department at least 7 days before each
63 test date. Testing results must be reported to the department within 60 days after the test
64 completion. If the department finds that the plan was not followed, the department may
65 conclude that the data of the testing results is invalid.

- 66 3. Sampling port and platform must be provided for the stack. An adequate and safe access to
67 the test ports must be provided. Other arrangements may be acceptable if approved by the
68 department before installation.
- 69 4. Prior to start-up of any new or modified emission units or process equipment that has the
70 potential to affect emissions to the atmosphere, Energy shall develop an operation and
71 maintenance plan for all such units and equipment. Copies of the manual shall be available to
72 the department. This plan shall include procedures and control methods described in the NOC
73 application as T-BACT in accordance with WAC 173-460-040(8). Prior to implementation,
74 Energy shall submit the plan to the department for approval. After approval, Energy shall
75 comply with the plan.
- 76 5. Operation and maintenance of equipment that has the potential to affect emissions to the
77 atmosphere must be conducted in compliance with all emission data and specifications
78 submitted as part of the NOC application unless otherwise approved by the department.
- 79 6. This final approval shall become void if construction of this unit is not commenced within
80 eighteen (18) months after issuance of the final approval, or if construction or operation of
81 these units is discontinued for eighteen (18) months.
- 82 7. Any activity undertaken by Energy in a manner that is inconsistent with the application or this
83 final approval, shall be subject to department enforcement under applicable regulations.
84 Nothing in this determination shall be construed to relieve Energy of its obligations under any
85 local, state, or federal laws or regulations.

- 86 8. Energy shall notify the department in writing at least 45 days before operational start-up of any
- 87 emission unit subject to this approval which could cause release of any air pollutants to the
- 88 atmosphere.
- 89 9. Access to this facility by the department shall be permitted upon request for the purpose of
- 90 compliance assurance inspections. Failure to allow access is grounds for enforcement action.
- 91 10. Energy shall not make any changes in the designs of the proposed air emission control system
- 92 without first notifying the department. The department may require a new approval or a
- 93 modification of this final approval.

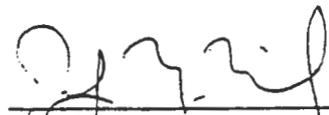
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96 PREPARED BY:

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98 
99 Robert C. H. King, P.E.
100 Chemical Engineer
101 Nuclear and Mixed Waste Management
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12-13-93

Date

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111 REVIEWED BY:

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115 Toby M. Michelena
116 Unit Supervisor
117 Nuclear and Mixed Waste Management
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12/13/93

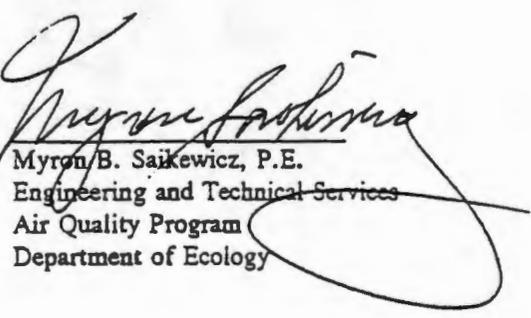
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APPROVED BY:


David B. Jansen, P.E.
Nuclear and Mixed Waste Management
Department of Ecology

12/13/1995
Date


Myron B. Saikewicz, P.E.
Engineering and Technical Services
Air Quality Program
Department of Ecology

12/13/95
Date

CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: NOTICE OF CONSTRUCTION FOR NONRADIOACTIVE AIR EMISSIONS FROM THE WASTE RECEIVING AND PROCESSING FACILITY (WRAP I FACILITY)

INTERNAL DISTRIBUTION

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		B. J. Broomfield	N3-13	
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		R. J. Landon	H6-22	
		D. R. Lucas	G6-46	
		J. J. Luke	H6-25	
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		H. E. McGuire, Level 1	B3-63	
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		J. A. Swenson	G6-45	
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