



July 28, 2020

20-NWP-120

William F. Hamel
Assistant Manager for River and Plateau
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-30
Richland, Washington 99352

Re: Use of *Calculating Potential to Emit Radiological Releases and Doses*, DOE/RL-2006-29

Reference: See page 2

Dear William F. Hamel:

The United States Department of Energy (USDOE) must comply, to the extent practicable, with Applicable or Relevant and Appropriate Requirements (ARARs) when conducting Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal actions. USDOE uses removal action procedures for the Deactivation, Decontamination, Decommissioning, and Demolition (D4) of radioactively contaminated buildings. The Department of Ecology (Ecology) and the United States Environmental Protection Agency (EPA) monitor USDOE compliance with ARARs during D4 activities, including compliance with air quality regulations.

Ecology, EPA, and the Washington Department of Health (WDOH) received requests to use the document *Calculating Potential to Emit Radiological Releases and Doses*, DOE/RL-2006-29, (Reference) for non-chronic use during facility D4 work. There are several criteria that exclude most of this work from using the chronic release document, as discussed in comments and project manager meetings at both Plutonium Finishing Plant (PFP) and 224-B, including:

- The work includes release scenarios that are intermittent and/or have variable emission rates. DOE/RL-2006-29, 3.4.2, Nonchronic Releases states, “If release scenarios are intermittent, and/or have variable emission rate these types of releases are not considered chronic releases, which could make use of the dose-per-unit release factors in Section 4 inappropriate.”
- For potential radionuclide emissions, the requirement for NESHAP radionuclides, 40 CFR 61.93(a), states in part, “... EPA approved sampling procedures, computer models CAP-88 or AIRDOS-PC, or other procedures for which EPA has granted prior approval...” We request that modeling or alternative calculations for all emissions be reviewed by WDOH and EPA.

- The state radionuclide ambient air standard, Washington Administrative Code (WAC) 173-480-040, calls out WAC 173-480-070 which states, "...Radionuclide emissions shall be determined and dose equivalents to members of the public shall be calculated using department of health approved sampling procedures, department of health approved models, or other procedures, including those based on environmental measurements that department of health has determined to be suitable."

We would like to reiterate that any use of the DOE/RL-2006-29 document must include justification for why the facility demolition meets the chronic use criteria.

If you have questions or need further information, please contact me at (509)372-7940 or john.temple@ecy.wa.gov, or Craig Cameron, Remedial Project Manager, at (509) 376-8665 or cameron.craig@epa.gov.

Sincerely,



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John Temple
Facility Transition Project Manager
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Washington State Department of Ecology

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Craig Cameron
Remedial Project Manager,
Hanford Project Office
Environmental Protection Agency

th/jlg

Reference: Document DOE/RL-2006-29, dated January 2016, *Calculating Potential-to-Emit Radiological Releases and Doses*, Revision 2

cc electronic:

Dave Bartus, EPA
Dave Einan, EPA
Jon Perry, MSA
Mason Murphy, CTUIR
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