



**U.S. Department of Energy
Hanford Site**

20-ESQ-0026

FEB 04 2020

Addressees:

TRANSMITTAL OF LICENSE/AS LOW AS REASONABLY ACHIEVABLE CONTROL TECHNOLOGY REVISION REQUEST AND NOTIFICATION OF OFF-PERMIT CHANGE, PERMIT NUMBER 00-05-006, RENEWAL 2, FOR THE CLOSURE OF THE PLUTONIUM URANIUM EXTRACTION PLANT TUNNEL 2 STABILIZATION LICENSED RADIOACTIVE AIR EMISSION UNITS 1527 THROUGH 1529

This letter transmits the Notification of Off-Permit Change (Attachment 1) and License/As Low As Reasonably Achievable Control Technology (ALARACT) Revision Request (Attachment 2) to close the licensed point sources, associated with the Plutonium Uranium Extraction (PUREX) Plant Tunnel 2 Stabilization activity, listed within FF-01 Radioactive Air Emissions License, an attachment of the Hanford Site Air Operating Permit (AOP), Permit Number 00-05-006, Renewal 3. Although stabilization of PUREX Plant Tunnel 2 has been completed, the tunnel does have a minimal potential-to-emit. Upon receipt of the attached documentation, it is requested that the emission points associated with PUREX Plant Tunnel 2 Stabilization activity be maintained as one Emission Unit within the Diffuse and Fugitive Table 2-1 of the FF-01 license. Both Attachment 1 and Attachment 2 have been prepared in accordance with Washington Administrative Code 246-247 and 173-401-724.

Attachment 1 is submitted to the Washington State Department of Ecology for its administration of the AOP, as well as to the U.S. Environmental Protection Agency, Region 10, as part of the notification process for off-permit changes as outlined in the AOP.

Attachment 2 is submitted to the Washington State Department of Health for approval, consistent with its authority to administer and enforce the state radioactive air emissions regulations, including licensing.

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If you have any questions, please contact me, or your staff may contact Brian J. Stickney, Assistant Manager for Safety and Environment, Richland Operations Office, on (509) 376-9079.

Sincerely,



Brian T. Vance
Manager

ESQ:AET

Attachments:

1. Notification of Off-Permit Change
2. License/ALARACT Revision Request

cc w/attachs:

L. Bauder, Ecology (Electronic + Hardcopy)
S. D. Berven, WDOH (Electronic + Hardcopy)
J. M. McAuley, EPA
J. W. Schmidt, WDOH
Administrative Record
Environmental Portal, G3-35

cc w/o attachs:

J. Bell, NPT
R. Buck, Wanapum
J. E. Bramson, CHPRC
F. J. Carleo, CHPRC
L. Contreras, YN
G. M. Fritz, MSA
M. N. Jaraysi, CHPRC
M. Johnson, CTUIR
R. A. Kaldor, MSA
M. C. Klein, MSA
M. P. Marrott, CHPRC
M. T. Schanke, CHPRC

Addressees – Letter dated FEB 04 2020
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Mr. John Martell, Manager
Radioactive Air Emissions Section
Washington State Department of Health
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Ms. Kelly McFadden, Manager
Stationary Source Unit
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900, AWT-150
Seattle, Washington 98101

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
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Richland, Washington 99354

Attachment 1
Letter Number 20-ESQ-0026

Notification of Off-Permit Change

Consisting of 2 pages including cover sheet

NOTIFICATION OF OFF-PERMIT CHANGE

Permit Number: 00-05-006, Renewal 2

This notification is provided to the State of Washington, Department of Ecology (Ecology), the Washington State Department of Health (WDOH), and the U.S. Environmental Protection Agency as a notice of an off-permit change described as follows.

The following changes are allowed pursuant to WAC 173-401-724(1), WAC 173-401-724(2), and WAC 173-401-724(6):

1. Change is not specifically addressed or prohibited by the AOP terms and conditions;
2. Change does not weaken the enforceability of the existing AOP conditions;
3. Change is not a Title I modification or subject to the acid rain requirements under Title IV of the FCAA;
4. Change meets all applicable requirements and does not violate an existing permit term or condition;
5. Change has complied with applicable preconstruction review requirements established pursuant to RCW 70.94.152.

Description of the change:

This is an Off-Permit Change for the closure of the two permitted point sources relating to the grouting activities for stabilization of the Plutonium Uranium Extraction Plant (PUREX) Tunnel 2. The changes will remove Emission Units (EU) 1527 and 1529 for "PUREX Tunnel 2 Stabilization Activities – Point Source 1 and 2" from the Hanford FF-01 License. Although stabilization has occurred, this source does still have a minimal Potential to emit (PTE) as a diffuse and fugitive source and remains listed in Table 2-1 as EU 1016 within the Hanford Air Operating Permit (AOP), FF-01 License, until a final closure decision is made in the future. Documentation will be submitted to the WDOH and to the Ecology.

Date of change: (To be provided in the agency approval order.)

This change will become effective upon receipt by the WDOH.

Describe the emissions resulting from the change:

Stabilization of PUREX Tunnel 2 was accomplished with the placement of grout (stabilization) and the mechanical capping for each of the 17 risers that allow remote access into the tunnel. The 17 risers and the plenum have been closed by the use of concrete as a means to cap these access points. Although the PTE is minimal, a PTE does still exist as a diffuse and fugitive source. The listing within the AOP FF-01 License, Table 2-1, will remain until final closure decisions are made in the future.

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

(To be provided in the agency approval order.)

No new requirements will be added to PUREX Tunnel 2. The two licensed point sources will be closed and the entirety of Tunnel 2 will be managed as a diffuse and fugitive emission source (EU 1016).

Attachment 2
Letter Number 20-ESQ-0026

License/ALARACT Revision Request
Consisting of 2 pages including cover sheet

