



Recd.
Records
April 6, 2015

Department of Energy
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

April 2, 2015

DW:2015:0140

Mr. Daniel W. Coyne
President & General Manager
CH2M HILL B&W West Valley, LLC
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

ATTENTION: J. D. Rendall, Regulatory Strategy, AC-EA

SUBJECT: Environmental Protection Agency Approval of Request for Approval to Construct a Replacement Ventilation System for the Main Plant Process Building (MPPB) at the U.S. Department of Energy (DOE) West Valley Demonstration Project (WVDP)

REFERENCE: Letter (365327), P. A. Giardina to B. C. Bower, "Request for Approval to Construct a Replacement Ventilation System for the Main Plant Process Building (MPPB) – Approval of the Application," dated March 25, 2015

Dear Mr. Coyne:

The referenced letter with enclosure is being forwarded to CH2M HILL B&W West Valley, LLC for review for accuracy, action and future use. Please ensure that the WVDP complies with the conditions and terms set forth in the approval.

The content of this correspondence is not intended to impact or modify scope and/or cost. If you have any questions regarding this matter, please contact Moira Maloney of my staff on Extension 4255.

Sincerely,

Bryan C. Bower, Director
West Valley Demonstration Project

Enclosure: Referenced Letter

cc: J. J. Hoch, CHBWV, AC-EA, w/enc.
M. N. Maloney, DOE-WVDP, AC-DOE, w/enc.
T. J. Vero, DOE-WVDP, w/enc.

MPK:365352 – 454.2.2





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAR 25 2015

Mr. Bryan C. Bower, Director
U. S. Department of Energy
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, New York 14171-9799

Dear Mr. Bower:

We have completed review of the submission, *Request for Approval to Construct a Replacement Ventilation System for the Main Plant Process Building (MPPB)*, dated June 13, 2013. The Request for Approval (RFA) has been sent for our review and approval pursuant to 40 CFR Part 61, Subpart H. We have also reviewed the *Replacement Ventilation Unit System Revised Monitoring and Sampling Approach for the Main Plant Processing Building (MPPB) at the U.S. Department of Energy (DOE) West Valley Demonstration Plant (WVDP)*, dated October 1, 2014, and other DOE responses to our comments and requests for additional information concerning this RFA.

Please find enclosed the approval of the application to construct a Replacement Ventilation System for the MPPB, WVDP-MPPB-RVS-New-001, signed by John Filippelli, Director, Clean Air and Sustainability Division.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul A. Giardina".

Paul A. Giardina, Chief
Radiation and Indoor Air Branch

cc: M.P. Krentz, DOE-WVDP
P.A. Giardina, EPA-RIAB
O. G. Povetko, EPA-RIAB

Enclosure

WVDP-RVS-MPPB-New-001
Replacement Ventilation System for the Main Plant Process Building
Approval to Construct
Sources of Airborne Radionuclide Emissions

In compliance with provisions of the Clean Air Act, as amended (42 USC §7401 et seq.) the Department of Energy (DOE) West Valley Demonstration Project (WVDP) Office is granted approval to construct the radioactive emission source, WVDP-RVS-MPPB-New-001, a Replacement Ventilation System (RVS) for the Main Plant Process Building (MPPB), located at the WVDP in West Valley, New York.

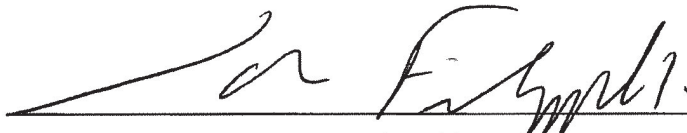
The approval is granted in accordance with the plans and materials submitted with the application and with Federal regulations governing the "National Emission Standards for Emissions of Radionuclides Other Than Radon from Department of Energy Facilities" (40 CFR Part 61, Subpart H). Any conditions attached to this document are considered part of this approval.

Failure to comply with the conditions or terms set forth in this approval may result in sanctions available under the authority of Section 1-604 of Executive Order 12088 as well as enforcement procedures established by the Clean Air Act.

This approval to construct/modify grants no relief from the responsibility for compliance with other applicable provisions of Federal regulations. This approval shall be effective immediately after receipt of the approval to construct by the applicant.

Dated

3/25/15



Director, Clean Air & Sustainability Division

CONDITIONS

I. Emergency Notification

- A. In the event of an accidental/unplanned release of radionuclides which leads to an air emission that may cause the standards of 40 CFR 61 to be exceeded; or may result in a health threat to the public; the DOE WVDP Office shall make timely notification to state, local, and Federal agencies.
- B. Initial phone notification should include the time of the accidental release; location of accident/release; estimate of quantity released; emergency steps taken to contain/control the release; type of assistance needed; and the name and title of person reporting the incident. A brief written summary of the event shall be submitted to Director, Clean Air and Sustainability Division, US Environmental Protection Agency (US EPA) Region 2 (Attn: Regional Radiation Program Manager) within 30 days of the event.
- C. US EPA Phone Notification - In Order of Preference
 - 1. Regional Radiation Program Manager
Paul A. Giardina
212-637-4010
 - 2. Health Physicist
Oleg Povetko
212-637-3746
 - 3. National Response Center
800-424-8802
- D. New York State (NYS) Phone Notification - In Order of Preference
 - 1. NYS Department of Health
Director, Bureau of Environmental Radiation Protection
Stephen Gavitt
518-402-7550
 - 2. NYS Department of Environmental Conservation
Chief, Radiological Sites Section
Timothy Rice
518-402-8789
 - 3. NYS Warning Point
518-292-2200

II. Permit Expiration

- A. Approval to construct is not transferable to another owner/operator.
- B. The DOE may submit to the US EPA Regional Administrator (Region 2 Clean Air and Sustainability Division Director) a written application for a determination of whether actions intended to be taken by the WVDP constitutes a modification or

construction of a source subject to the standard. The Regional Administrator will notify the owner/operator of his determination within 30 days after sufficient information to evaluate the application (40 CFR 61.06).

- C. If intended actions to be taken by the WVDP are determined to constitute construction/modification which effects existing permitted sources, the permit and conditions shall supersede and/or amend the existing permit.

Updates in notification requirements and phone contacts supersede previously submitted notification requirements and phone contacts.

III. Other Notifications

The owner/operator shall provide written notification to US EPA Region 2 as follows.

- A. The 30-day notification of startup testing.
- B. Within 30 days after completion of startup testing, provide report on the results and conclusions. A copy of this report shall be submitted to US EPA Region 2 for inclusion with the materials submitted for this application.
- C. As part of startup testing, confirm the physical locations where horizontal plume velocities for all proposed RVS' Emission Units (also referred to as "Replacement Ventilation Unit System" and "Replacement Ventilation Units" (RVUs) in some correspondence) reach zero and whether any Emission Unit plumes will be entrained by other plumes.
- D. If individual RVS' Emission Units are relocated from their startup positions, confirm the physical locations where horizontal plume velocities for all proposed RVS' Emission Units reach zero and whether any Emission Unit plumes will be entrained by other plumes.
- E. Notification of start of normal operations.
- F. Notification when the cumulative dose reaches 0.1 mrem in any given year. Notification will include a projection of the estimated end-of-year dose and usage of the RVS' Emission Units. Although the not-to-exceed standard is 10 mrem/yr for all radionuclide air emissions from the entire operations, the intent of the notification is to provide early notice that use of these units will contribute a higher than the normally expected fraction of WVDP's annual dose.

IV. Operations/Maintenance

- A. Operations, testing and maintenance described in the application and associated correspondence shall apply.

- B. The facility owner/operation shall maintain all equipment, facilities, and systems installed or used to achieve compliance with the standard (40 CFR 61.92) in accordance with 40 CFR 61 Subpart H, your application and associated correspondence, and in a manner consistent with good air pollution control practices for minimizing emissions.
- C. Records of operations, maintenance, inspection, testing, repair, monitoring data, and Standard Operating Procedures for conducting such activities shall be maintained pursuant to 40 CFR 61.12(c) and provided to EPA Region 2 upon request.
- D. Correspondence associated with WVDP-RVS-MPPB-New-001:
 - i. October 1, 2014, letter; Bryan C. Bower to John Filippelli, "Replacement Ventilation Unit System Revised Monitoring and Sampling Approach for the Main Plant Processing Building (MPPB) at the U.S. Department of Energy (DOE) West Valley Demonstration Plant (WVDP).
 - ii. April 1, 2014, email; Martin Krentz to O. G. Povetko, "RE: Comment Response Matrix for EPA comments on WVDP RFA to construct MPPB RVUs".
 - iii. March 27, 2014, email; O.G. Povetko to Martin Krentz, "RE: Comment Response Matrix for EPA comments on WVDP RFA to construct MPPB RVUs".
 - iv. February 18, 2014, email; John Rendall to O.G. Povetko, "RE: receipt of 2 compact disks".
 - v. February 18, 2014, email; O.G. Povetko to John Rendall, "RE: receipt of 2 compact disks".
 - vi. February 18, 2014, email; O.G. Povetko to John Rendall, James Fox, Lori Kearney, Moira Maloney "RE: receipt of 2 compact disks".
 - vii. February 14, 2014, Two compact discs mailed from Martin Krentz to O.G. Povetko; both disk were dated 02-12-14 and contain some documents referenced in the WVDP RFA to construct RVS for the MPPB.
 - viii. February 13, 2014, email; Martin Krentz to O.G. Povetko, "RE: Comment Response Matrix for EPA comments on WVDP RFA to construct MPPB RVUs".
 - ix. February 7, 2014, email; O.G. Povetko to Martin Krentz, "RE: Comment Response Matrix for EPA comments on WVDP RFA to construct MPPB RVUs".
 - x. January 29, 2014, email; Martin Krentz to O.G. Povetko, "WVDP Response to EPA Clarification to Comment #1 on WVDP MPPB Ventilation RFA and RVU Presentation".
 - xi. January 14, 2014, email; O.G. Povetko to Martin Krentz, "RE: WVDP RVU Photos".
 - xii. January 13, 2014, email; Martin Krentz to O.G. Povetko, "RE: WVDP RVU Photos File 3 of 3".
 - xiii. January 10, 2014, email; Martin Krentz to O.G. Povetko, "RE: WVDP RVU Photos".
 - xiv. October 28, 2013, email; Martin Krentz to O.G. Povetko, "Comment Response Matrix for EPA comments on WVDP RFA to construct MPPB RVUs".

- xv. August 13, 2013, email; O.G. Povecko to Martin Krentz, "EPA RFA Acceptance Review RAIs".
- xvi. June 13, 2013, letter; Bryan C. Bower to O.G. Povecko, "Request for Approval to Construct a Replacement Ventilation System for the Main Plant Process Building (MPPB)".

V. Severability

The provisions of this approval to construct are severable, and, if any provision of this approval to construct is held invalid, the remainder of this approval to construct shall not be affected thereby.

VI. Other Applicable Regulations

The owner/operator shall construct and operate the source in compliance with all other applicable provisions of 40 CFR 52, 60, and 61.

VI. Agency Notification

All correspondence as required by this approval to construct/modify shall be sent to:

U.S. Environmental Protection Agency
Director, Clean Air and Sustainability Division
Attention: Regional Radiation Program Manager
290 Broadway
New York, NY 10007

Distribution:

P. Bendarz	WV-PL6
S. W. Chase	WV-PL6
D. W. Coyne	WV-PL6
T. D. Dogal	WV-PL6
J. R. Fox	WV-PL6
R. M. Geimer	WV-ADM
J. J. Hoch	WV-PL6
J. D. Rendall	AC-EA
A. W. Upshaw	WV-PL6
C. M. Wrotniak	WV-ES