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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
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July 20, 2012

12-NWP-126

Mr. Scott L. Samuelson, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Determination of Incomplete Application, Waste Treatment and Immobilization Plant
(WTP) Nonradioactive Air Emissions Notice of Construction (NOC) Permit Application
Supplement to DE02NWP-002

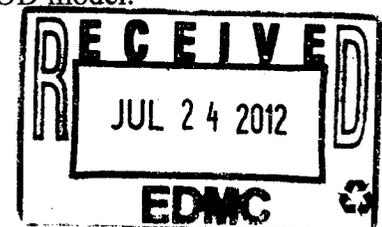
Reference: USDOE-ORP Letter 12-ECD-0010, *Waste Treatment and Immobilization Plant
(WTP) Nonradioactive Air Emissions Notice of Construction (NOC) Permit
Application Supplement to DE02NWP-002*, dated June 05, 2012 1214621

Dear Mr. Samuelson:

The Department of Ecology (Ecology) received your funded petition for approval of a Notice of Construction on June 22, 2012. Your petition on behalf of the United States Department of Energy - Office of River Protection proposes to eliminate the Type II emergency diesel generators (EDG) from WTP design and replace them with turbine generators for emergency power production. The application also proposes an increase to the annual operating hour restriction on each of the diesel engine-driven fire pumps (Reference). Ecology has determined that your application is presently incomplete.

Ecology finds that the operating hours for the turbines and fire pumps are not represented uniformly as manipulation of operating hours using averaging times for pollutants, as given in WAC 173-460-150, were performed for averaging periods other than a year. The requested operating hours for the turbines, 164 hours per year, and fire generators, 300 hours per year, need to remain consistent regardless of the averaging period.

The scalar propagation of emissions in grams per second (g/s) for pollutants was calculated using the operating hours of the emission units. The emission rate of a pollutant, as used for scalar propagation, is independent of the operating hours for the unit. The actual emission rate of the units needs to be calculated and used as the scalar factor in the AERMOD model.



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For these reasons, and for the purposes of section 140 of WAC 173-455, *Air Quality Fee Regulation*, you must correct and re-submit the emission estimates and dispersed concentrations of each of the air pollutants to complete your application in order for Ecology to continue processing your application. Please include the AERMOD output data files.

If you have any questions, contact me at 509-372-7983.

Sincerely,



Philip M. Gent, P.E.
Lead Air Engineer
Nuclear Waste Program

jvs

cc: Robert H. Anderson, MSA
Gabriel Bohnee, NPT
Dennis Bowser, USDOE
Robert Haggard, URS
Stuart Harris, CTUIR
Russell Jim, YN
Ken Niles, ODOE
Rich Hibbard, Ecology
Administrative Record: AIR Permits
Environmental Portal
USDOE-ORP Correspondence Control