



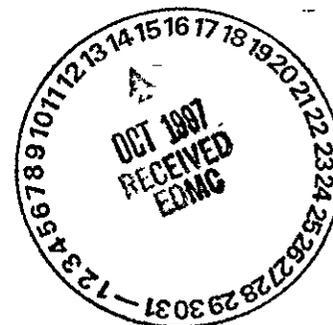
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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7587

September 30, 1997

Mr. James E. Rasmussen, Director  
Environmental Assurance, Permits, and Policy Division  
U.S. Department of Energy  
P. O. Box 550, MSIN: A5-15  
Richland, WA 99352



Dear Mr. Rasmussen:

Re: Request for Elimination of Ammonia Emissions Limit

Your request (97-EAP-451) for elimination of ammonia emissions limit from Notices of Construction (NOC) NOC-93-3 and NOC 96NW-1-301 was received by the Washington State Department of Ecology's (Ecology) Nuclear Waste Program on June 9, 1997. Your request is not approved. However, the Effluent Treatment Facility (ETF) campaign can proceed without further Ecology air emissions approvals. Ecology will use its enforcement discretion to: 1) regulate the organic emissions from the ETF and 242-A Evaporator under the Resources Conservation and Recovery Act (RCRA) Subpart AA, and 2) allow a one-time exceedance of the NOCs ammonia limits for the scheduled ETF process condensate campaign with elevated ammonia. This letter summarizes Ecology's rationale for the decision.

Chapter 173-460 WAC (Washington Administrative Code) establishes control of new sources emitting Toxic Air Pollutants (TAPs) listed in WAC 173-460-150 for 150 Class A pollutants and in WAC 173-460-160 for more than 400 Class B pollutants. Class A TAPs include known, probable and potential human carcinogens, and Class B TAPs include asphyxiant or nuisance particulate. WAC 173-460 covers both organic and inorganic compounds and substances. Public health is protected by application of Best Available Control Technology (BACT) for reduction of emissions of TAPs, including ammonia, and checking the maximum ambient air concentration of each TAP to be sure it does not exceed its ASIL (acceptable source impact level). Ammonia is an inorganic Class B TAP with an ASIL of 100 micrograms per cubic meter averaged over a 24-hour period.

Subpart AA of 40 CFR Part 264 and 265, under the RCRA, applies to process vents which treat organic wastes using designated treatment technologies. Subpart AA requires