0062558

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

04-AMCP-0418

AUG 24 2004

Mr. D. Zhen
Radiation and Indoor Air Section
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED
AUG 30 2004
EDMC

Dear Mr. Zhen:

REQUEST TO REDESIGNATE THE 291-A-1 STACK AS A MINOR EMISSION POINT

This is a request to redesignate the 291-A-1 stack as a minor emission point, pursuant to Appendix A, Section IV of the 1994 Federal Facility Compliance Agreement (FFCA) for Radioactive National Emission Standards for Hazardous Air Pollutants. This request is based on results from air sampling that was performed upstream of pollution control equipment (Enclosure). The sampling was performed during a period representative of the source in its normal mode of operation.

This is also a request for approval of the alternative sampling methodology used to reassess the 291-A-1 stack potential-to-emit (PTE). Sampling was performed upstream of the high efficiency particulate air (HEPA) filters and downstream of the prefilters. As indicated in 40 CFR 60, Appendix A, Method 1, Sample and Velocity Traverses for Stationary Sources, Section 2.4, "If the average value of α is greater than 20 degrees, the overall flow condition in the stack is unacceptable and alternative methodology, subject to the approval of the administrator, must be used to perform accurate sample and velocity traverses." Since the flow condition exceeded this criterion, alternative methodology was developed in accordance with the evaluation and recommendations of ANSI N13.1-1999 Committee member John Glissmeyer. The enclosure provides a complete description of the alternative sampling method and evaluation report.

Based on the upstream air sampling at the 291-A-1 stack, an updated unabated PTE was calculated. The potential dose was modeled using the U.S. Environmental Protection Agency (EPA) - approved CAP-88 PC code. The resulting estimated dose to the maximally exposed public individual was approximately 0.03 millirem per year total effective dose equivalent.

The facility ventilated by the 291-A-1 stack is currently in a long term surveillance and maintenance mode. No out-year activities are anticipated to occur in the foreseeable future that would represent a physical or operational change and associated increase in the PTE.

According to Appendix A, Section IV of the FFCA, EPA agreed to respond to a stack redesignation request within 30 days. Please review the enclosed documentation, and provide approval of the stack downgrade accordingly.

A parallel letter is being submitted to the Washington State Department of Health for review and approval, and you are on copy distribution of that letter.

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971, or Joel Hebdon, Director, Office of Environmental Services, (509) 376-6657, for regulatory issues.

Sincerely,

Keith A. Klein
Manager

AMCP:PJV

Enclosure

cc w/encl:
J. A. Bates, FHI
A. W. Conklin, WDOH
L. P. Diediker, DFSH
W. E. Green, FHI
S. Harris, CTUIR
R. Jim, YN
D. L. Johnson, FFS
G. J. LeBaron, FHI
R. W. Poeton, EPA
J. W. Schmidt, WDOH
P. Sobotta, NPT
O. S. Wang, Ecology
Administrative Record (PUREX 291-A-1 Stack)
Environmental Portal, A3-01