



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

05-AMCP-0333

JUL 8 2005

Mr. Richard Albright, Director  
 Office of Air, Waste, and Toxics  
 U.S. Environmental Protection Agency, Region 10  
 1200 Sixth Avenue  
 Seattle, Washington 98101

Mr. Allen W. Conklin, Supervisor  
 Air Emissions and Defense Waste Section  
 Washington State Department of Health  
 P.O. Box 47827  
 Olympia, Washington 98504

**RECEIVED**  
 JUL 21 2005  
**EDMC**

Addressees:

**REQUEST TO RE-DESIGNATE PUREX 291-A-1 STACK AS A MINOR EMISSION POINT**

The purpose of this letter is to respond to the U.S. Environmental Protection Agency (EPA) June 30, 2005, and Washington State Department of Health (WDOH) July 1, 2005, letters rejecting the U.S. Department of Energy, Richland Operations Office's (RL) request to re-designate the PUREX stack as a minor stack. RL intends to respond to your letters at greater length, but due to the response time set forth in the EPA letter, and the fact that RL did not receive the EPA letter until July 6, 2005, we are sending this brief response to notify you of our dissent. Since the WDOH letter covers the same issues, DOE is responding to both letters. In your letters you suggest that RL consider whether another test should be conducted with current operational parameters to assess the potential to emit (PTE). Although RL believes the historical data is supportive of re-designation, RL has decided to accept your proposals to perform a current test to conclusively eliminate any question of configuration, flow rates, or changes in efficiency since 1994, therefore an aerosol test on the PUREX deep bed filter number 2 will be performed and the PTE will be recalculated based on these test results. It is RL's understanding that deep bed filter efficiency is the entire issue and that the results of this test will conclusively determine the stack designation.

For clarification, an aerosol test of the deep bed filter cannot fully comply with ANSI N510, because the filtration system was not designed to ANSI N509, since its construction predated the standard. However, we can meet the substantive requirements of ANSI N510. And as allowed by N510, certain sections of N510 can be used as technical guidance for non-N509 systems. A test plan will be prepared and made available for EPA and WDOH review prior to performance of the test. After completion of the additional testing, RL Plans on requesting your agencies' reconsideration of our request to re-designate PUREX 291-A-1 Stack as a minor emission point based on the new data.

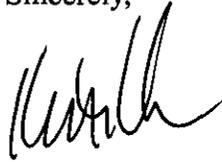
Addressees  
05-AMCP-0333

-2-

JUL 8 2005

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.

Sincerely,



Keith A. Klein  
Manager

AMCP:FMR

cc: G. Bohnee, NPT  
N. Ceto, EPA  
L. D. Crass, FHI  
L. J. Cusack, Ecology  
S. Harris, CTUIR  
J. S. Hertzell, FHI  
R. Jim, YN  
T. M. Martin, HAB  
E. J. Murphy-Fitch, FHI  
K. Niles, ODOE  
M. A. Wilson, Ecology  
D. A. Isom, Admin Record, H6-08  
Environmental Portal