



Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

Incoming:9203081

XREF:925402D

0024061

(910545-2) per M. Gram IRM

92-RPB-186

JUL 31 1992



Mr. J. M. Willenberg
Air Quality Program Manager
State of Washington
Department of Ecology
Post Office Box 47600
Olympia, Washington 98504-7600

Dear Mr. Willenberg:

CONFIRMATION OF ORAL POLICY GUIDANCE PROVIDED BY THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

The purpose of this letter is to request written confirmation of oral policy guidance provided by you during and after the June 25, 1992 seminar, "Controlling Toxics" sponsored by the State of Washington Department of Ecology (Ecology). The guidance pertained to application of Chapter 173-460 of the Washington Administrative Code (WAC). Please provide written confirmation of your policy guidance, as interpreted in the following paragraphs, or provide alternate guidance if the following has been misstated.

Each stack at a given plant or facility is considered a separate source for compliance with small quantity emission (SQE) rates and acceptable source impact levels (ASILs), provided the upstream emission systems are separate. The example given was of two spray booths in a single auto painting shop. If each spray booth is ventilated to a separate stack, each booth is considered separately. If both booths vent to the same stack, both booths are considered together. If both booths vent to a common header, and then are re-split to two stacks, both stacks are considered together.

The level of documentation needed to demonstrate Best Available Control Technology for Toxics (T-BACT) for emission sources should be commensurate with the quantity of emissions. For instance, for a source with very low emissions, the SQE rates would have a T-BACT analysis of significantly less detail than a source which requires second tier analysis. A T-BACT analysis a few pages in length would not be unusual for a source with very low emissions. Additionally, the level of scrutiny given to various toxic air pollutants (TAPs), within a single T-BACT analysis, should be proportional to the level of emissions. If a single TAP is emitted at rates exceeding the SQE rates, the T-BACT should provide more detail on controlling that TAP, than other TAPs which will also be emitted, but at rates below SQE rates.

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Mr. J. M. Willenberg
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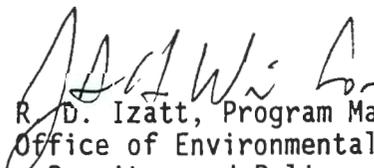
-2-

Public notice is not necessarily required for all notices of construction (NOCs) approved under WAC 173-460. Public notice would not normally be required for sources having emissions below SQE rates, but other circumstances could dictate the need for public notice (e.g., if the proposed action has substantial public interest). Additionally, public notice is not automatically required for sources that exceed SQE rates, but comply with ASILs.

Ms. Audrey O'Brien, of your staff, is coordinating a two-phase revision of WAC 173-460. Phase I will, among other things, add federal hazardous air pollutants (HAPs), not currently on the TAPs list, to the TAPs list. It is the U.S. Department of Energy, Richland Field Office's understanding that Ecology does not intend to include radionuclides (a HAP) in the list of pollutants, subject to WAC 173-460, because existing state and federal regulations (specifically WAC 246-247, WAC 173-480, and 40 Code of Federal Regulations, 61 Subpart H) adequately regulate radioactive air emissions.

Matters discussed in this memo have potential to significantly impact ongoing and planned Hanford site activities, therefore your timely response is encouraged. Should you have any questions, please contact Mr. S. D. Stites of my staff on (509) 376-8566.

Sincerely,


R. D. Izatt, Program Manager
Office of Environmental Assurance,
Permits, and Policy

RPB:SDS

cc: D. A. Lauer, APCA
R. C. H. King, Ecology
R. E. Lerch, WHC
R. W. Oldham, WHC

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Author	Addressee	Correspondence No.
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Subject: CONFIRMATION OF ORAL POLICY GUIDANCE PROVIDED BY THE STATE OF
WASHINGTON DEPARTMENT OF ECOLOGY

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