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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 19, 2002



Mr. Joel Hebdon
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Dear Mr. Hebdon

Re: Washington State Department of Ecology (Ecology) Response to Air Emission
New Source Review (NSR) Evaluation for the Plutonium Finishing Plant's (PFP)
232-Z Deactivation Activities

The Washington State Department of Ecology (Ecology) has reviewed the subject New Source Review (NSR) Evaluation for the Plutonium Finishing Plant (PFP) 232-Z Deactivation Activities. Ecology tentatively agrees the activity is exempt from Criteria Pollutant Permitting, but not necessarily from Air Toxics Permitting. Since the nature of the particulate emissions is not given, and maybe unknown, the applicability of Washington Administrative Code (WAC) 173-460 to this project cannot be evaluated fully. Additional information may also be needed concerning decontamination methods and specific reagents that will be employed. Based on the current proposal, Ecology cannot allow the use of any decontamination reagents that include constituents that are Toxic Air Pollutants (TAPs).

WAC 173-400-110(5)(b) defers to WAC 173-460 for TAPs. Ecology has not established threshold levels for TAP compounds. If all the emissions will be in particulate form, Ecology will tentatively accept the controls imposed under the radioactive air permit (WAC 246-247) as Toxics-Best Available Control Technology (T-BACT) for air toxics also. However, this does not relieve the United States Department of Energy (USDOE) from characterizing the materials that may potentially be released to the environment, particularly where containment and filtration controls are difficult or impossible to implement. Once the materials are characterized, a Notice of Construction (NOC) may be needed if TAP compounds are detected that are not otherwise constituents of concern for compliance with WAC 246-247, and for which controls imposed under WAC 246-247 are ineffective.



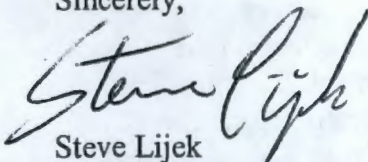
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Ecology agrees with USDOE that the activity is exempt from New Source Review for Criteria Pollutants. Ecology tentatively disagrees with USDOE that the activity is exempt from WAC 173-460; additional information is needed for evaluating the applicability of this requirement. If all TAPs present are in particulate form then USDOE still needs to submit an NOC; except a T-BACT analysis will probably not be necessary, since the controls imposed through the WAC 246-247 permit should be acceptable. If the only TAP present is lead chromate, with emissions of only 0.6 pounds per year, and if none of the decontamination reagents are TAPs, then the activity is deemed by Ecology to not require a Notice of Construction (NOC) pursuant to WAC 173-460.

If the activity is still considered to be exempt according to stipulations of this letter, then Ecology concurs with USDOE that an NOC is not required. No additional information is needed, and this letter will serve as Ecology's approval of the decontamination activities. If new information becomes available during deactivation and/or characterization, USDOE must notify Ecology promptly and Ecology may need to require an NOC for the activity to continue.

If you have further questions or need more information or clarification please contact me at 736-3095.

Sincerely,



Steve Lijek
Environmental Engineer
Nuclear Waste Program

SL:nc

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Administrative Record