



Department of Energy

Richland Operations Office
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9105130

91-EAB-310

OCT 10 1991

Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Dear Mr. Nord:

NOTIFICATION OF INITIATION OF PHASE I ACTIVITIES AT THE HWVP SITE

In May 1990, the DOE Field Office, Richland (RL) transmitted to the State of Washington Department of Ecology (Ecology) the Hanford Waste Vitrification Plant (HWVP) Clean Air Act (CAA) Permit Application (DOE/RL-89-26) pursuant to the Prevention of Significant Deterioration (PSD) program. The HWVP became subject to PSD review as a result of its potential to emit radionuclides. However, with the passage of the CAA Amendments of 1990, radionuclide emissions to air were specifically excluded from PSD review, and the HWVP application was subsequently withdrawn.

On July 1, 1991, Ecology formally recognized the withdrawal of the HWVP application. In response to a follow-up Ecology request, RL committed to submitting a PSD Applicability Form for the HWVP. It is understood that the PSD Applicability Form for HWVP must be submitted to Ecology prior to commencement of construction.

Ecology and RL have worked diligently over the past several months to define activities that constitute commencement of construction under the PSD program. Given recent Ecology clarification of the term "commencement of construction," it is RL's determination that proposed Phase I activities at the HWVP site do not constitute commencement of construction. If proposed HWVP Phase II activities include the construction of a structure that will emit regulated air pollutants (e.g., the main Vitrification Building), RL will submit the PSD Applicability Form to Ecology prior to initiation of Phase II, presently scheduled for November 1992.

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Pursuant to WAC 173-400-040, precautions will be taken at the HWVP site to minimize emissions of fugitive dust resulting from Phase I activities.

Any questions or comments regarding this transmittal should be directed to Mr. S. D. Stites of my staff on (509)376-8566.

Sincerely,



E. A. Bracken, Director
Environmental Restoration Division

- cc: A. W. Conklin, DOH
- J. P. Cooke, APCA
- T. Le, Ecology
- J. Leitch, EPA
- R. E. Lerch, WHC
- R. W. Oldham, WHC

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