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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 11, 2004

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EDMC

Mr. Roy J. Schepens, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Dear Mr. Schepens:

Re: Ecology Response to Evaluation of Toxics - Best Available Control Technology - Waste Retrieval System Operations in the AN and AW Double Shell Tank Farms and Revised Pages to Non-radioactive Notice of Construction for Operation of New Ventilation Systems in AN and AW Tank Farms, Transmitted by Letter 04-ED-057, R. J. Schepens to M. A. Wilson, Received by Ecology July 12, 2004

References: 1) Organic Vapor Source Term for Double Shell Tanks During Phase 1 Waste Retrieval Operations, RPP-12735, G. Crummel, Vista Engineering for CH2M Hill Hanford Group, Inc. (CH2M), July 2004

2) Toxic Air Pollution Notice of Construction Multi-Function Waste Tank Facility, DOE/RL-94-91, Rev 0, Environmental Services Westinghouse Hanford Company, August 1994

Ecology has reviewed portions of the subject Toxics-Best Available Control Technology (T-BACT) analysis and the emissions estimate that established the basis of the determination (Reference 1). Ecology has not completed the cost review, but notes that the determination is very different than the T-BACT conclusions of Reference 2. Reference 2 indicated that there was not an adverse economic impact from using adsorption for emissions control. In addition, the High Efficiency Gas Absorption (HEGA) system slated for this exhauster's system was not considered in the analysis. Ecology does not request further work on the T-BACT analysis at this time.

Ecology is involved in two Data Quality Objective (DQO) processes intended to clarify the issues associated with tank farm emissions. Until these efforts are completed, it will not be possible to make a final decision on the T-BACT or determine what controls will be required.

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Mr. Roy J. Schepens
August 11, 2004
Page 2

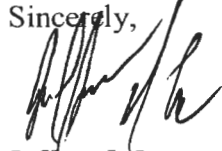
Ecology agrees the emissions estimate (Reference 1) forming the basis of the Notice of Construction and T-BACT is well thought out, but is still based upon a limited set of data, and extrapolating the results to encompass new waste additions to the AN/AW farms is difficult. Ecology hopes the DQO's will explain the air toxics problem and address a path-forward to solve it over the long-term.

In conclusion, the first step is to complete both DQO processes, or other decision making processes that may be developed during the DQO meetings, in an objective and thorough manner which considers all the evidence at our disposal and with mutually agreed-upon results. The resolution of this problem may take a long time, since very little data is currently available on the composition of the wastes and waste heterogeneity. In the interim, conservative protective measures utilizing engineering controls capable of preventing atmospheric contamination must be evaluated, approved by Ecology, and implemented as necessary.

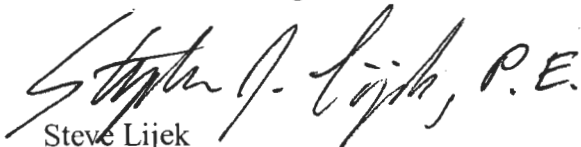
Ecology also requests that any research and engineering conducted on the HEGA system, or any other potential control technology not otherwise evaluated in the T-BACT, be provided to us. Ecology understands there was some effort to select and design a system that could remove a variety of air toxics. Ecology requests information on the evaluation(s) of any control technologies (e.g. HEGA), including why the controls were originally thought necessary and why these controls are now considered not necessary. Ecology requests this information by one month from the date this letter was mailed.

If you have questions, please contact me at (509) 372-7914 or Steve Lijek at (509)-372-7913.

Sincerely,



Jeffery J. Lyon
Project Manager Tank Waste Storage
Nuclear Waste Program



Steve Lijek
Environmental Engineer
Nuclear Waste Program

JJL:SL:nc

cc: See next page

Mr. Roy J. Schepens

August 11, 2004

Page 3

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