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

AUG 24 2004

04-AMCP-0419

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

RECEIVED
AUG 30 2004
EDMC

Dear Mr. Conklin:

REQUEST FOR APPROVAL OF COMPLETED UPSTREAM SAMPLING FOR
REDESIGNATION OF THE 291-A-1 STACK AS A MINOR EMISSION POINT

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This is a request for approval of the sampling recently performed upstream of the high efficiency particulate air (HEPA) filters and downstream of the Deep Bed Fiberglass prefilters at the 291-A-1 stack, for purposes of reassessing potential-to-emit (PTE). Measured concentrations were back-calculated to determine the PTE upstream of the prefilters. As indicated in Washington Administrative Code 246-247-030(21), "Determine the potential-to-emit by one of the following methods." Among the methods listed are (d) "Sample the effluent upstream from all control devices, as approved by the department," and (b) "Perform a back-calculation using measured emission rates and in situ measurements of the control equipment efficiencies, as approved by the department." Due to the vent system configuration described in the enclosure, the sampling method invokes a combination of these two methods for an accurate assessment, with some variation to provide conservatism. The enclosure provides a complete description of the sampling method and evaluation report.

Based on the upstream air sampling results, the unabated calculated PTE is approximately 0.03 millirem per year total effective dose equivalent to the maximally exposed public individual. The sampling data and calculation results are provided in the enclosure.

This sampling provides the basis for our request to the U. S. Environmental Protection Agency (EPA) to redesignate the 291-A-1 stack as a minor emission point. Upon receiving the Washington State Department of Health (WDOH) approval of the sampling method and results, the U. S. Department of Energy, Richland Operations Office will submit permit documentation modification requests to WDOH and State of Washington Department of Ecology for approval.

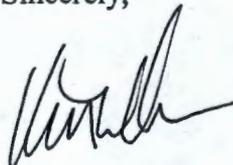
The facility ventilated by the 291-A-1 stack is currently in a long-term surveillance and maintenance mode of operation. No modified activities are anticipated to occur in the foreseeable future.

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A parallel letter is being submitted to EPA for review and approval. You are on copy distribution for that letter. According to Appendix A, Section IV of the FFCA, the EPA agreed to respond to a stack redesignation request within 30 days. Please review and approve the upstream measurement method and results and respond within 20 days, in consideration of the EPA timeframe.

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, or Joel Hebdon, Director, Office of Environmental Services, on (509) 376-6657.

Sincerely,



Keith A. Klein
Manager

AMCP:PJV

Enclosure

cc w/encl:

J. A. Bates, FHI
S. L. Clark, WDOH
L. P. Diediker, DFSH
W. E. Green, FHI
S. Harris, CTUIR
R. Jim, YN
D. L. Johnson, FFS
G. J. LeBaron, FHI
R. W. Poeton, EPA
J. W. Schmidt, WDOH
P. Sobotta, NPT
O. S. Wang, Ecology
D. Zhen, EPA
Administrative Record (PUREX 291-A-1-Stack)
Environmental Portal, LMSI