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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

April 11, 1994

Mr. James D. Bauer, Program Manager
Office of Environmental Assurance
Permits and Policy
U.S. Department of Energy
P. O. Box 550
Richland, WA 99352



Dear Mr. Bauer:

Re: Letter, J. D. Bauer to D. Butler, "Request for Concurrence With Emissions Evaluation for Approval of Deactivation of PUREX Plant Pursuant to WAC 173-400 and WAC 173-460," dated March 10, 1994

This letter responds to the subject request, transmitted to the Washington State Department of Ecology (Ecology) on March 10, 1994, by the U.S. Department of Energy, Richland Operations Office (USDOE).

Your letter of March 10, 1994, requested that:

"... the State of Washington Department of Ecology (Ecology) provide written concurrence with the conclusion reached in the enclosed document, "Evaluation Of Proposed Plutonium Uranium Extraction (PUREX) Plant Deactivation Activities With Reference to Airborne Toxic Emission Releases," that approval is not required from Ecology prior to commencement of deactivation of the PUREX Plant."

Specifically, the March 10, 1994, letter requested that Ecology concur with the following:

"... the enclosed document which demonstrates that PUREX Plant TAP emissions from the proposed deactivation activities will not exceed past TAP emissions from the PUREX Plant during normal operations and that Prevention of Significant Deterioration (PSD) emissions will not exceed the limits set forth in permit PSD-X80-14, and, therefore, deactivation activities will not result in an emissions increase subject to prior approval by Ecology."

In regard to PSD emissions, Ecology agrees with the following cited guidance provided by the U.S. Environmental Protection Agency (EPA) on August 25, 1993, in a letter from Ann Pontius, EPA, to James Rasmussen, USDOE, that:

"Since DOE has an active PSD permit which has evaluated best available control technology for the operation of the PUREX facility, and since there will be no changes that eliminate or bypass the control devices, EPA has determined that no

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modification to the federally issued PSD permit would be necessary to accommodate operation of the PUREX facility during deactivation process."

This concurrence is based on the understanding that deactivation of the PUREX Plant will not require the sugar denitration process to reduce the nitric acid inventory, and that 1988 NO_x emission levels will not be exceeded. Therefore, this letter does not give USDOE permission for sugar denitration. Furthermore, if it is determined at a later date that the sugar denitration process will be required to reduce the nitric acid inventory, Ecology will reconsider, at that time, the possibility of permitting pursuant to WAC 173-400.

In regard to emissions of TAPs from PUREX Plant deactivation activities, the following guidance is provided:

On March 21, 1994, representatives of Ecology, USDOE, and Westinghouse Hanford Company met to discuss the "Evaluation of Proposed PUREX Plant Deactivation Activities with Reference to Airborne Toxic Emission Releases," (Evaluation) submitted with the March 10, 1994, letter. As a result of those discussions, Ecology concurs with the conclusion of the Evaluation that permitting pursuant to WAC 173-460 is not required for the deactivation of the PUREX Plant. Ecology does, however, request in regard to Section 2.15 of the Evaluation, that USDOE provide numerical values quantifying and comparing the TAPs inventory in the P and O Gallery and "White Room" during 1988 operations with the estimated TAPs during piping deactivation. It is not required that this comparison be provided prior to commencement of April 1994 deactivation activities, but that the comparison be provided to Ecology for concurrence within 30 days from receiving this letter. Also, note that the PUREX deactivation must be included in the Hanford site air operating permit application when it is submitted.

Should you have questions regarding this guidance, please contact me at (509) 736-3000, or Moses Jaraysi at (509) 736-3016.

Sincerely,

Dave Nylander

Dave Nylander
Nuclear Waste Program

DN:sr

cc: Jean Senat, USDOE
Steve Stite, USDOE
Doug Hamrick, WHC
Greg LaBaron, WHC
Jeff Luke, WHC
Julie Robertson, WHC
Dan Duncan, EPA

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Subject: REQUEST FOR CONCURRENCE WITH EMISSIONS EVALUATION FOR APPROVAL OF DEACTIVATION OF PUREX PLANT PURSUANT TO WASHINGTON ADMINISTRATIVE CODES 173-400 AND 173-460

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