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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

December 18, 2007

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EDMC

Mr. David A. Brockman, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Determination of Incomplete Application to Modify Order DE06NWP-002

References:

1. USDOE-RL Letter 08-SED-0047, Transmittal of *Proposed Modification to the Notice of Construction Approval Order #DE06NWP-002 for Operation of Two Diesel Engines at the High Bay Testing Facility (336 Building)*, November 16, 2007.
2. Order DE06NWP-002, July 20, 2006.

Dear Mr. Brockman:

On November 16, 2007 (Reference 1), the United States Department of Energy – Richland Operations wrote to Ecology requesting modification of Order DE06NWP-002 (Reference 2). We received your request on November 21, 2007, and have determined that your request for modification is incomplete.

Your letter requested permit modification to allow the use of older engines with higher air pollutant emission rates. Emission estimates and dispersion analyses you provided to support your proposed operations do not demonstrate compliance to standards for public exposure to nitric oxide emissions. Specifically, your request to operate two such older engines would exceed acceptable source impact levels (ASILs) of WAC 173-460 when both engines are operated at the same time. Without demonstration of compliance to standards, Ecology must determine that your permit modification request is incomplete.

In order to complete a demonstration of compliance, Ecology requires that your modification request be based upon dispersion modeling consistent with current U.S. Environmental Protection Agency -approved standards and that emissions resulting from proposed operations will not exceed ASILs.

Your complete application for modification of the permit must include (WAC 173-460-070 and WAC 173-460-080):

1. Dispersion analyses, prepared using AERMOD, supporting Class B Toxic Air Pollutant dispersion coefficients appropriate for your proposed operations.
2. Description of proposed operations and emissions demonstrating compliance with ambient impact requirements of WAC 173-460.

Following the receipt of a complete application, we will process your application to modify the Order and will advise you of our intent to either approve or deny your application.

If you have any questions, contact me at 509-372-7983.

Sincerely,

Doug Hendrickson, P.E.
Lead Air Engineer
Nuclear Waste Program

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cc: Dennis Bowser, USDOE
Pete Garcia, USDOE
Mary Jarvis, USDOE
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
John Martell, WDOH
Administrative Record: AIR Permits
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