



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 8, 2011

11-NWP-070

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

Re: Draft Notice of Construction Approval Order DE11NWP-001 (Phased Installation)

Dear Mr. Samuelson:

Please find draft Order No. DE11NWP-001 enclosed with this letter. This draft order is for phased replacement of primary tank ventilation exhaust systems involving 241-AP, 241-SY, and 241-AZ tank farms. This draft order is based upon emissions increases which include criteria air pollutants above exemption thresholds, TAPs above de minimis thresholds, and upon the emission consequence of dimethyl mercury above its acceptable source impact level (ASIL) in WAC 173-460-150.

To further assess the environmental and public health impact of dimethyl mercury, this draft order is being transmitted to Washington Department of Ecology (Ecology) headquarters for processing of Toxic Air Pollutant (TAP) permitting provisions of Washington Administrative Code (WAC) 173-460-090. Following the TAP Second Tier review, the proposed permit action will be subject to public comment in accord with WAC 173-400-171(3)(b). The final order will be issued after the conclusion of the public comment period.

This letter replaces Reference 1 in order to facilitate the multi-phased construction plan. The proposed tank farm ventilation systems will be constructed, installed, tested, and fully operational in three phases beginning with 241-AP, to be followed by 241-SY and 241-AZ, respectively. Specific permit conditions are added for the phased construction.

Provisions under section 140 of WAC 173-455, *Air Quality Fee Regulation*, assess a fee for the processing of your NOC approval request. Please be advised that you should anticipate receipt of a fee invoice in the amount of \$18,000.00 under this standard. Second tier TAPs fees under this regulation are distinct from NOC application fees and have already been invoiced to you. All new NOCs will be in effect only after the permitting fees are fully paid.



Mr. Scott L. Samuelson  
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If you have any questions, please contact Oliver Wang at 509-372-7932.

Sincerely,

*Ron Skinnarland, Manager by Frederick A. Bond*

Ron Skinnarland, Manager  
Waste Management Section  
Nuclear Waste Program

ow:js

Enclosure (1)

References:

1. Ecology Letter 11-NWP-042 to U.S. Department of Energy, *Determination of Complete Application, Tank Ventilation Upgrades*, May 18, 2011

cc: Dennis Bowser, USDOE  
Robert H. Anderson, MSA  
Felix Miera, WRPS  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
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Environmental Portal

Mr. Scott L. Samuelson  
July 8, 2011

bcc/electronic w/enc:

David Ogulei, Ecology  
Ron Skinnarland, Ecology  
Oliver Wang, Ecology

bcc w/enc:

NWP Central File: Air Permitting

bcc w/o enc:

NWP Reader File