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

March 17, 2011 11-NWP-014

Mr. Jonathan A. Dowell, Acting Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Determination of Incomplete Application, Tank Ventilation Upgrades

Reference: USDOE-ORP Letter 11-ESQ-017, *Submittal of Hanford Facility Criteria and Toxics Notice of Construction (NOC) for the Operation of the 241-AP, 241-SY, and 241-AY/AZ Tank Farm Ventilation System Upgrades and Second Tier Review Petition for the Operation of the 241-AP, 241-SY, and 241-AY/AZ Tank Farm Ventilation System Upgrade,* dated February 17, 2011

Dear Mr. Dowell:

On behalf of the United States Department of Energy, Office of River Protection, you petitioned for approval of a Notice of Construction to install and operate tank waste management (mixing) equipment and upgraded ventilation systems (Reference). The Department of Ecology (Ecology) has determined that your application is presently incomplete.

Provisions of the Washington Administrative Code (WAC) 173-400-110(6) require that we advise you of aspects of your application which are incomplete so that you may be able to fulfill informational requirements necessary to continue your permit processing.

Specific information required to complete your permit application is clarification and correction of the emission estimates and emission consequences in your application. Your emission estimate appendix (Appendix A) develops a scalar factor for emissions based upon a set of tank head space pollutant concentrations and your operations projections. You handled the scalar propagation of emissions in grams per second (g/s) to pounds per unit time for ammonia differently than all other toxic air pollutant (TAP) species. This data manipulation, without provision of the raw data sources applied in the development of emissions as termed in g/s for the sum of the thirteen tanks in the project, results in our inability to clearly identify your project emissions.

For this reason, and for the purposes of section 140 of WAC 173-455, *Air Quality Fee Regulation*, you must correct and submit the emission estimates and dispersed concentrations of each of the air pollutants, as detailed in Appendix Tables A-1 and A-2 to complete your application.

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

Sincerely,

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

dh/jvs

cc: Dennis Bowser, USDOE
David Ogulei, ECY
Robert H. Anderson, MSA
Felix Miera, WRPS
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
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Administrative Record: AIR Permits
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