AREVA

April 19, 2004
JBP:04:013

Benton Clean Air Authority
Attn: Mr. John St. Clair
114 Columbia Point Drive, Suite C
Richland, WA 99352

Dear Mr. St.Clair:

Subject: CY 2003 Framatome ANP Inc. Plant Emissions Report

This letter transmits to the Benton Clean Air Authority (BCAA) the annual Washington Department of Ecology (WDOE) Air Emissions Inventory Information and BCAA Synthetic Minor Air Source (Order 95-05) summary for the CY 2003 plant emissions from Framatome ANP Inc.'s nuclear fuel fabrication plant at 2101 Horn Rapids Road.

With respect to Order 95-05, NOx source measurements for the UO2 Building dissolvers (K-32 stack) were obtained in October 2003, while the ELO Building dissolver (K-56 stack) measurements were obtained in December 2003. All NOx source measurements were obtained with a chemiluminescent analyzer instrument using EPA Method 7E, "Determination of Nitrogen Oxides Emissions from Stationary Sources (Instrumental Analyzer Procedure)". The measurement system is the Thermo Environmental Instruments Inc. Model 42H Chemiluminescence NO-NO2-NOx Analyzer (EPA Approval RFNA-1289-074) and Measurements Technologies Model 3040 Dilution Sampling System, although the dilution system was not used for the measurements.

Responses to the requirements of Order 95-05 Section 3 are as follows:

Section 3.a through 3.d – Attachment 1 shows the 12-month rolling sum of uranium dioxide (UO2) throughput for the dissolvers in the ELO and UO2 buildings during CY2002-2003. The data verify that the throughput did not exceed the 90,000 and 400,000 Kg UO2 limits for the ELO and UO2 dissolvers, respectively.

Sections 3.e and 3.f – Stack K-56 source measurements were obtained on December 9-10 2003 for the ELO dissolver. K-32 source measurements were obtained on October 7-9 2003 for the UO2 Building dissolvers. Attachment 2 summarizes the results and indicates that the 0.36 lb. NOx per Kg UO2 emission limit was not exceeded by any dissolver. Attachment 2 also summarizes the NOx emissions for CY2003 that indicate the 100 ton total NOx discharge limit also was not exceeded.

FRAMATOME ANP, INC.
2101 Horn Rapids Road, Richland, WA 99352
Tel. : 509-375-8100 - Fax : 509-375-8402 www.areva.com

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Section 3.g and h – Attachment 3 is the summary of the waste burned in the Solid Waste Uranium Recovery (SWUR) facility. The summary shows that the average feed rate did not exceed the 200 lb. per hour limit.

The completed Air Emissions Inventory forms are attached. Please do not hesitate to call if there are any questions regarding the information submitted; I can be reached at 375-8452.

Very truly yours,

Jim Perryman

Jim Perryman
Environmental Engineer

/mah

Enclosures

Attachment 1

								UDISSOLV.XLS			
	ELO DISSOLVERS			UO2 DISSOLVERS						UNH+PD	Overall
			12 month			12 month			12 month	12 month	Combined
	GSUR		sum	UNH		sum	PD		sum	sum	12 month total
Date	Kg - U	Kg - UO2	Kg-UO2	Kg - U	Kg - UO2	Kg - UO2	Kg - U	Kg - UO2	Kg - UO2	Kg - UO2	Kg - UO2
Jan-02	2986	3388	38176	1124	1275	48113	2670	3029	18179	66292	104468
Feb-02	590	669	36108	1303	1478	43049	1966	2230	19453	62502	98610
Mar-02	497	564	31878	2388	2709	45758	5716	6485	24901	70659	102537
Apr-02	933	1058	30971	738	837	41303	0	0	23694	64997	95968
May-02	622	706	27765	1031	1170	41374	311	353	24047	65421	93186
Jun-02	0	0	24748	652	740	35437	691	784	24201	59638	84386
Jul-02	890	1010	22280	1048	1189	36626	435	494	24695	61321	83601
Aug-02	675	766	20951	3088	3503	31714	3014	3419	28114	59828	80779
Sep-02	842	955	19758	695	788	24307	1307	1483	26605	50912	70670
Oct-02	2282	2589	18016	1602	1817	21591	2888	3276	29882	51472	69488
Nov-02	1461	1658	16879	0	0	18162	0	0	23146	41308	58187
Dec-02	829	941	14303	211	239	13880	0	0	21553	35433	49736
Jan-03	1321	1499	12414	2667	3026	17497	0	0	18524	36022	48435
Feb-03	934	1060	12804	3629	4117	20136	2112	2396	18690	38826	51630
Mar-03	400	454	12694	0	0	17427	0	0	12205	29632	42326
Apr-03	230	261	11896	0	0	16590	0	0	12205	28795	40691
May-03	681	773	11963	0	0	15420	0	0	11852	27272	39236
Jun-03	157	178	12141	3339	3788	18469	769	872	11941	30409	42551
Jul-03	333	378	11510	1932	2192	19471	2803	3180	14627	34099	45608
Aug-03	182	206	10950	0	0	15968	0	0	11208	27176	38126
Sep-03	197	223	10218	1428	1620	16800	0	0	9725	26525	36743
Oct-03	90	102	7732	2037	2311	17293	1979	2245	8694	25987	33718
Nov-03	872	989	7063	3514	3987	21280	4087	4637	13330	34610	41674
Dec-03	917	1040	7163	0	0	21040	0	0	13330	34371	41534

GSUR = Gadolinia Scrap Uranium Recovery dissolvers in the ELO Building

UNH = Uranium oxide powder dissolvers in the UO2 Building (Uranyl Nitrate Hexahydrate)

PD = Uranium oxide pellet dissolver in the UO2 Building

Attachment 2

2003 STACK NOX EMISSION SUMMARY

Stack No.	Dissolvers	NOX Emission Rate	Dissolver Feed Rate	Average # NOX / Kg UO2	Total Annual Kg UO2	Total Annual # NOX
K-56	ELO-GSUR	0.500 # per hour (Average over four hours)	5.1 Kg/hr	**0.098**	7163	702
K-32	UO2 Pellet	2.16 # per hour (Average over three hours)	33.0 Kg/hr	**0.065**	13330	866
K-32	UO2 Powder	0.601 # per batch (Average of ten batches)	18.00 Kg/batch	**0.033**	21040	694
Total						**2263 (1.13 Tons)**

Attachment 3

SWUR Average Daily And Monthly Burn Rate

Printed *Monday, April 12, 2004*

Date	Pounds Burned	Avrage Rate	Days Active
January 2003			
1/6/2003	780.4	32.5 lbs/hr	
1/7/2003	2165.6	90.2 lbs/hr	
1/8/2003	2420.9	100.9 lbs/hr	
1/9/2003	2662.9	111.0 lbs/hr	
1/10/2003	828.3	34.5 lbs/hr	
1/13/2003	1542.8	64.3 lbs/hr	
1/14/2003	2341.6	97.6 lbs/hr	
1/15/2003	2349.4	97.9 lbs/hr	
1/16/2003	2513.0	104.7 lbs/hr	
1/17/2003	704.4	29.3 lbs/hr	
1/20/2003	1263.4	52.6 lbs/hr	
1/21/2003	2431.6	101.3 lbs/hr	
1/22/2003	2229.1	92.9 lbs/hr	
1/23/2003	1034.1	43.1 lbs/hr	
1/29/2003	2497.6	104.1 lbs/hr	
1/30/2003	2592.0	108.0 lbs/hr	
	30357.0	**79.1 lbs/hr**	**16**
February 2003			
2/3/2003	705.2	29.4 lbs/hr	
2/4/2003	2678.3	111.6 lbs/hr	
2/5/2003	2351.2	98.0 lbs/hr	
2/6/2003	2353.6	98.1 lbs/hr	
2/7/2003	683.0	28.5 lbs/hr	
2/10/2003	697.6	29.1 lbs/hr	
2/11/2003	939.8	39.2 lbs/hr	
2/12/2003	2424.4	101.0 lbs/hr	
2/13/2003	2610.7	108.8 lbs/hr	
2/14/2003	2269.6	94.6 lbs/hr	
2/15/2003	928.3	38.7 lbs/hr	
2/19/2003	1022.7	42.6 lbs/hr	
2/20/2003	737.4	30.7 lbs/hr	
	20401.7	**65.4 lbs/hr**	**13**

Date	Pounds Burned	Avrage Rate	Days Active
March 2003			
3/10/2003	41.4	1.7 lbs/hr	
3/11/2003	1577.2	65.7 lbs/hr	
3/12/2003	2120.5	88.4 lbs/hr	
3/13/2003	2558.4	106.6 lbs/hr	
3/14/2003	1092.8	45.5 lbs/hr	
3/17/2003	1220.8	50.9 lbs/hr	
3/18/2003	2472.3	103.0 lbs/hr	
3/19/2003	2513.1	104.7 lbs/hr	
3/20/2003	2557.1	106.5 lbs/hr	
3/21/2003	584.3	24.3 lbs/hr	
3/24/2003	1104.9	46.0 lbs/hr	
3/25/2003	2763.3	115.1 lbs/hr	
3/26/2003	2310.1	96.3 lbs/hr	
3/27/2003	2110.5	87.9 lbs/hr	
3/28/2003	889.1	37.0 lbs/hr	
3/31/2003	1144.3	47.7 lbs/hr	
	27060.2	**70.5 lbs/hr**	**16**
April 2003			
4/1/2003	2148.3	89.5 lbs/hr	
4/2/2003	2832.3	118.0 lbs/hr	
4/3/2003	2091.3	87.1 lbs/hr	
4/4/2003	820.9	34.2 lbs/hr	
4/16/2003	1183.1	49.3 lbs/hr	
4/17/2003	2733.5	113.9 lbs/hr	
4/18/2003	2630.3	109.6 lbs/hr	
4/19/2003	2974.3	123.9 lbs/hr	
4/20/2003	2808.0	117.0 lbs/hr	
4/21/2003	2548.2	106.2 lbs/hr	
4/22/2003	2731.5	113.8 lbs/hr	
4/23/2003	2679.9	111.7 lbs/hr	
4/24/2003	2839.8	118.3 lbs/hr	
4/25/2003	1165.7	48.6 lbs/hr	
4/28/2003	1716.1	71.5 lbs/hr	
4/29/2003	2357.5	98.2 lbs/hr	
4/30/2003	2607.4	108.6 lbs/hr	
	38868.2	**95.3 lbs/hr**	**17**

Date	Pounds Burned	Avrage Rate	Days Active
May 2003			
5/1/2003	2572.4	107.2 lbs/hr	
5/2/2003	1046.2	43.6 lbs/hr	
5/5/2003	1024.7	42.7 lbs/hr	
5/6/2003	2956.6	123.2 lbs/hr	
5/7/2003	2171.8	90.5 lbs/hr	
5/8/2003	1947.5	81.1 lbs/hr	
5/9/2003	978.4	40.8 lbs/hr	
5/12/2003	1192.5	49.7 lbs/hr	
5/13/2003	1373.1	57.2 lbs/hr	
5/14/2003	2209.8	92.1 lbs/hr	
5/15/2003	2425.1	101.0 lbs/hr	
5/16/2003	732.0	30.5 lbs/hr	
	20630.0	**71.6 lbs/hr**	**12**

Grand Total For Year **137317.1**

BENTON CLEAN AIR AUTHORITY
2003 Request for Air Emissions Information

Plant Number: J - 005 - 0027 FRAMATOME ANP, INC

Section 1: Facility Information

(Is the following complete and accurate? If not, correct any errors and provide any missing information.)

ADDRESS, PHYSICAL AND MAILING			
Physical Addr: (no PO Box)	2101 HORN RAPIDS RD RICHLAND, WA 99352	**Mailing Address:**	2101 HORN RAPIDS RD RICHLAND, WA 99352

Universal Business Identifier (UBI): 600006226

TECHNICAL CONTACT			
Name:	JIM PERRYMAN	**Fax:**	(509)375-8202
Phone Number:	(509)375-8452	**e-mail:**	James.Perryman@framatome.anp.com

PRIMARY STANDARD INDUSTRIAL PROCESS (SIC) CODE (one only)	
SIC	**Industry Type**
2819	INDUSTRIAL INORGANIC CHEMICALS, NEC

GEOGRAPHIC COORDINATES (Facility Front Door)

UTM Horizontal (km): 323 **Vertical:** 5135.2 **Zone:** 11

Or

Latitude: N 46° 20' 56" **Longitude:** W 119° 18' 1"

CERTIFICATION OF DATA ACCURACY

Consistent with state law, the data presented here is accurate to the best of my knowledge. (Please submit this signed page with any electronic submissions.

Jim Perryman	Env. Engineer	Jim Perryman	4/12/04
Print Name	**Title**	**Signature**	**Date**

Plant Number: J - 005 - 0027 FRAMATOME ANP, INC

Section 2: Emission Point Information

(Is the following complete and accurate? If not, correct any errors and provide any missing information.)

Emission Point No: 01 **Description:** DISSOLVING UOx IN NITRIC ACID STACK K-56

Boiler Design Capacity (if applicable) in MMBTUs:

POINT STANDARD INDUSTRIAL PROCESS (SIC) CODE (one only)	
SIC	**Industry Type**
2819	INDUSTRIAL INORGANIC CHEMICALS, NEC

POINT GEOGRAPHIC COORDINATES

UTM Horizontal (km): 323 **Vertical:** 5135 **Zone:** 11

Or

Latitude: N 46° 20' 58" **Longitude:** W 119° 18' 1"

POINT OPERATING SCHEDULE (Quarterly throughput must equal 100 or 0 if not operating)

	2002	2003			2002	2003
Jan – Mar:	32	42	%	**Hrs/Day**	24	24
Apr – Jun:	13	17	%	**Days/Wk:**	4	4
Jul – Sep:	19	11	%	**Wks/Yr:**	50	50
Oct – Dec:	36	30	%			
	100	100	%			

STACK PARAMETERS (if applicable)

	2002	2003			2002	2003	
Temperature:	80	80	°F	**Flow Rate:**	619	743	ACFM
Water Vapor:	2	2	%	**Oxygen, Dry:**			%
Height:	50	50	ft	**Plume Height:**			ft
Diameter:	1	1	ft	(if no stack)			

CONTROL EQUIPMENT (Please associate with the proper segments on next page(s))

Code*	Description
002	WET SCRUBBER - MEDIUM EFFICIENCY
099	MISCELLANEOUS CONTROL DEVICES

* A list of valid codes may be found at http://www.ecy.wa.gov/ecology/programs/air/emisinv.htm

Plant Number: J - 005 - 0027 FRAMATOME ANP, INC

Section 2: Emission Point Information

(Is the following complete and accurate? If not, correct any errors and provide any missing information.)

Emission Point No: 02 **Description:** DISSOLVING UOx IN NITRIC ACID STACK K-32

Boiler Design Capacity (if applicable) in MMBTUs:

POINT STANDARD INDUSTRIAL PROCESS (SIC) CODE (one only)	
SIC	**Industry Type**
2819	INDUSTRIAL INORGANIC CHEMICALS, NEC

POINT GEOGRAPHIC COORDINATES

UTM Horizontal (km): 323 **Vertical:** 5135 **Zone:** 11

Or

Latitude: N 46° 20' 58" **Longitude:** W 119° 18' 1"

POINT OPERATING SCHEDULE (Quarterly throughput must equal 100 or 0 if not operating)

	2002	2003			2002	2003
Jan – Mar:	46	28	%	**Hrs/Day**	24	24
Apr – Jun:	11	14	%	**Days/Wk:**	7	7
Jul – Sep:	29	20	%	**Wks/Yr:**	38	30
Oct – Dec:	14	38	%			
	100	100	%			

STACK PARAMETERS (if applicable)

	2001	2002			2001	2002	
Temperature:	92	92	°F	**Flow Rate:**	2650	2400	ACFM
Water Vapor:	4	4	%	**Oxygen, Dry:**			%
Height:	77	77	ft	**Plume Height:**			ft
Diameter:	2	2	ft	(if no stack)			

CONTROL EQUIPMENT (Please associate with the proper segments on next page(s))

Code*	Description
002	WET SCRUBBER - MEDIUM EFFICIENCY
099	MISCELLANEOUS CONTROL DEVICES

* A list of valid codes may be found at http://www.ecy.wa.gov/ecology/programs/air/emisinv.htm

Plant Number: J - 005 - 0027 FRAMATOME ANP, INC
Point Number: 01 DISSOLVING UOx IN NITRIC ACID

Section 3: Emissions from Segments Information (Please use one page for each segment)

(Is the following complete and accurate? If not, correct any errors and provide any missing information.)

SCC Code: 30405099 **Segment Number:** 01
Miscellaneous Casting And Fabricating

Process Information

	2002	2003
Material (in TONS)	16	8

Insignificant Emissions Unit? (Y/N): N
Comments: _____
Confidentiality: Is process data confidential (see RCW 70.94.205)? _____ Yes X No

CRITERIA POLLUTANT EMISSIONS and AMMONIA (Specify in tons per year)

Criteria Pollutant	Emissions 2002	Emissions 2003	Estimation Code*	Control Equip. Code Primary	Control Equip. Code Secondary	Control Efficiency (%)
Particulate Total	0	0	5	099		99.95
PM_{10}	0	0	5	099		99.95
$PM_{2.5}$	0	0		099		
SO_2	0	0				
NOx as NO_2	0.26	0.35	1	002		80
VOC, (reported as _____)	0	0				
CO	0	0				
NH_3 (ammonia)		0				

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS #	Emissions 2002	Emissions 2003	Est. Code*

* A list of valid codes may be found at http://www.ecy.wa.gov/programs/air/emisinv.htm

Plant Number: J - 005 - 0027 FRAMATOME ANP, INC
Point Number: 02 DISSOLVING UOx IN NITRIC ACID

Section 3: Emissions from Segments Information (Please use one page for each segment)

(Is the following complete and accurate? If not, correct any errors and provide any missing information.)

SCC Code: 30405099 **Segment Number:** 01
Miscellaneous Casting And Fabricating

Process Information

	2002	2003
Material (in TONS)	41	37

Insignificant Emissions Unit? (Y/N): N
Comments: _____
Confidentiality: Is process data confidential (see RCW 70.94.205)? _____ Yes X No

CRITERIA POLLUTANT EMISSIONS and AMMONIA (Specify in tons per year)

Criteria Pollutant	Emissions 2002	Emissions 2003	Estimation Code*	Control Equip. Code Primary	Control Equip. Code Secondary	Control Efficiency (%)
Particulate Total	0	0	5	099		99.95
PM_{10}	0	0	5	099		99.95
$PM_{2.5}$	0	0		099		
SO_2	0	0				
NOx as NO_2	1.1	0.78	1	002		80
VOC, (reported as _____)	0	0				
CO	0	0				
NH_3 (ammonia)		0				

TOXIC POLLUTANT EMISSIONS (Specify in pounds per year)

Toxic Pollutant	CAS #	Emissions 2002	Emissions 2003	Est. Code*

* A list of valid codes may be found at http://www.ecy.wa.gov/programs/air/emisinv.htm