



Department of Energy

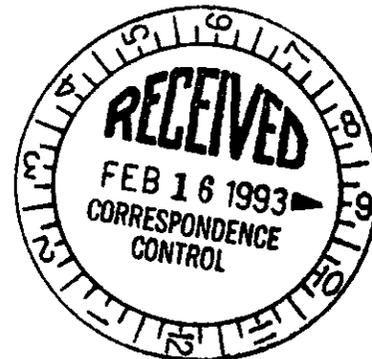
9301610

Richland Field Office

P.O. Box 550

Richland, Washington 99352

FEB 09 1993



93-LWB-027

Mr. Paul T. Day
Hanford Project Manager
U. S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Mr. Day:

LIQUID EFFLUENT SAMPLING AND ANALYSIS PLANS

In several letters to the U.S. Department of Energy, Richland Field Office, the U.S. Environmental Protection Agency provided comments to the revised liquid effluent Sampling and Analysis Plans (SAP). Those comments and responses are attached. In addition, revision 2 of the 2724-W Laundry Wastewater SAP is attached for your review and approval.

If you have any questions regarding this submittal, please contact Lance Mamiya of my staff on (509) 376-1471.

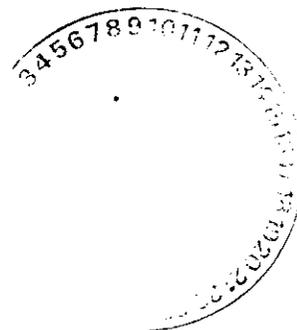
Sincerely,

for R.P. Cate
June M. Hennig, Director
Waste Management Division

WMD:LSM

Attachments

- cc w/att:
- D. R. Sherwood, EPA
- D. B. Jansen, Ecology
- G. Anderson, Ecology
- M. A. Selby, Ecology
- R. W. Oldham, WHC
- R. E. Lerch, WHC
- T. B. Veneziano, WHC
- B. A. Austin, WHC
- B. A. Davis, MACTEC



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RESPONSES TO
U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON
REVISED LIQUID EFFLUENT SAMPLING AND ANALYSES PLANS

References:

- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, 222-S Laboratory Waste Water to 216-S-Crib Sampling and Analysis Plan, (WHC-SD-EV-075, Rev.1), dated January 7, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, 2101-M Waste Stream Sampling and Analysis Plan, (WHC-SD-PLN-014, Rev. 1), dated January 7, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, N-Reactor Effluent Sampling and Analysis Plan, (WHC-SD-NR-PLN-008, Rev. 1), dated January 6, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, Sampling and Analysis Plan for the 183-D Area Filter Backwash Facility Process Wastewater, (WHC-SD-PLN-035, Rev. 2), dated January 6, 1993.
- Letter, D. R. Sherwood, EPA, to S.H. Wisness, RL, 2724-W Laundry Wastewater Sampling and Analysis Plan, (WHC-SD-LL-PLN-001, Rev 0), dated January 6, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, PUREX CSL Sampling and Analysis Plan, (WHC-SD-PLN-013, Rev 1), dated December 29, 1992.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, 400 Area Secondary Cooling Water Sampling and Analysis Plan, (WHC-SD-FF-PLN-002, Rev 2), dated December 29, 1992.

222-S Laboratory Waste Water to 216-S-26 Crib Sampling and Analysis Plan

COMMENT

"The U.S. Environmental Protection Agency (EPA) approves this plan for use, but we are somewhat concerned about the lack of description of Quality Control (QC) samples to be taken as part of this plan. Nearly all other plans approved to date provide a list of QC samples to be analyzed with each sampling event. Without QC samples, any hazardous substances found in the waste water will be attributed to the facility"

RESPONSE

The U.S. Department of Energy, Richland Field Office (RL) recognizes the EPA position on attributing any substances found in an effluent stream to the facility from which it came, unless it can be shown that the water influent to the facility contains that same substance in similar concentrations. To alleviate this potential problem, samples of the influent will be collected at least once and analyzed for those analytes noted in Section G.1 of the Sampling and Analysis Plan (SAP). In addition, quality control samples will be collected and analyzed in accordance with

Sampling and Analysis Plan for the 183-D Filter Backwash Facility Process Wastewater

COMMENT

"The (EPA) has completed its review of the Sampling and Analysis Plan for the 183-D Area Filter Backwash Facility Process Wastewater. This letter serves as approval of this plan.

The EPA and the Washington State Department of Ecology (Ecology) believe this plan should be implemented soon if the U.S. Department of Energy (DOE) plans to continue use of the 100-D ponds as the disposal site for the 183-D Area Filter Backwash Facility Process Wastewater after June 1995. Under Milestone M-17-10, the 100-D ponds are required to cease receipt of liquid discharges by June 1995, unless such units have been clean closed in accordance with Resource Conservation and Recovery Act. Data from the wastewater sampling and analysis program would help to support any request for continued discharge to the 100-D Ponds subsequent to clean closure.

Please advise EPA and Ecology of (y)our plans for discharge of the 183-D Area Filter Backwash Facility Process Wastewater after June 1995."

RESPONSE

RL has no plans to discharge this effluent after June 1995.

2724-W Laundry Wastewater Sampling and Analysis Plan

COMMENT

"The (EPA) has completed its review of the 2724-W Laundry Wastewater Sampling and Analysis Plan. It appears this plan was not revised in accordance with earlier comment review cycles. The EPA considers this plan to be deficient. The sampling objectives are incomplete. The analyte list is incomplete and inconsistent with the Quality Assurance Program Plan. No description of the routine sampling and analysis program is provided, yet it is clear from previous reports that Alpha, Beta, Strontium-90, gamma energy analysis, and Plutonium-239 were analyzed on a monthly basis. This plan requires major revision.

Please revise and resubmit this plan on or before January 31, 1993.

RESPONSE

The Plan has been revised and is attached for EPA approval.

PUREX CSL Sampling and Analysis Plan

COMMENT

"The (EPA) has completed its review of the PUREX CSL Sampling and Analysis Plan. This letter serves as formal approval of this plan.

In recent weeks, the U.S. Department of Energy has announced that the PUREX Plant will undergo a change in operational status from standby to shutdown. If this change in status is likely to influence the quality of the effluent discharge from the PUREX CSL, modifications to the plan may be necessary. As this transition proceeds, EPA and (Ecology) would like to be kept apprised of any significant changes in liquid effluent discharge practices."

RESPONSE

Effluent discharge practices will be monitored by PUREX Operations and any significant changes will be reported as requested. The Sampling and Analysis Plan will be revised and approved in accordance with the Tri-Party Agreement requirements as appropriate.

400 Area Secondary Cooling Water Sampling and Analysis Plan

COMMENT

"The (EPA) has completed its review of the 400 Area Secondary Cooling Water Sampling and Analysis Plan. This letter serves as formal approval of this plan.

As additional liquid effluent sampling and analysis plans are approved, EPA would like to meet with the U.S. Department of Energy and the Washington State Department of Ecology to discuss implementation of the sampling and analysis program."

RESPONSE

WHC had prepared a draft schedule for implementation. WHC is prepared to discuss this at the convenience of RL, EPA and Ecology.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: JM Hennig, RL Addressee: PT Day, EPA Correspondence No.: Incoming: 9301610

Subject: LIQUID EFFLUENT SAMPLING AND ANALYSIS PLANS

INTERNAL DISTRIBUTION

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		R. W. Oldham	H6-25	
		T. B. Veneziano, Assignee	L4-96	X
		EDMC	H6-08	X



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