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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

February 3, 1992

Mr. Cliff Clark
U. S. Department of Energy
Post Office Box 550
Richland, Washington 99352

Re: Waste Water Pilot Plant Research, Development, and Demonstration
Permit Application - Notice of Deficiency

Dear Mr. Clark:

Ecology has reviewed the Waste Water Pilot Plant Research, Development, and Demonstration (RD&D) Permit Application submitted on October 31, 1991. Our comments are limited to the portions of the application relating to Pilot Plant specifically and not to the narrative regarding the 242-A Evaporator and the Liquid Effluent Retention Facility (LERF). We acknowledge receipt of the U.S. Environmental Protection Agency's comments on the RD&D permit application and intend our comments to be supplemental. Our comments are as follows:

1. There is no mention of the container management provisions of WAC 173-303-630. The tank trailers are containers and they must be managed in accordance with the applicable provisions.
2. Individual test plans must be submitted to Ecology for review.
3. Proposals for substituting a treatment technology with an "equivalent" technology must follow the appropriate permit modification procedures.
4. Section 4.2.1 states, the testing of several filtration systems will be performed as described in Section 4.1.5.6. Is this an error?
5. The loading and unloading of liquid tank trailer waste must be conducted in accordance with WAC 173-303-395(4). Visqueen or other sheet plastic liners are not adequate for containment purposes. All modifications at the LERF to support the pilot plant studies must also be documented in the LERF permit application.
6. If wipe sampling conducted during the implementation of closure activities indicates the ventilation system is contaminated, a request for modification of the closure plan must be submitted in accordance with the appropriate permit modification procedures.
7. Section 8.3 is inaccurate.

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If you have any questions, comments, or both, please contact me at (206) 459-6725.

Sincerely,



Paul R. Stasch
Compliance Specialist

cc: Steve Wisness, USDOE-RL
Paul Day, USEPA
T. Veneziano, AR
Dave Jansen
Toby Michelena

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