



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

AUG 27 2003

03-RCA-0363

Ms. Kathleen A. Conaway
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 1315 W. Fourth Avenue
 Kennewick, Washington 99336

RECEIVED
 SEP 11 2003

EDMC

Dear Ms. Conaway:

COMMENTS ON DRAFT PERMIT AND FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST-4501 FOR THE 400 AREA FAST FLUX TEST FACILITY (FFTF) PROCESS SEWER SYSTEM

This responds to your letter to me, no subject, dated July 23, 2003, which transmitted the above-referenced documents to the U.S. Department of Energy, Richland Operations Office (RL) for comment prior to final issuance. RL appreciates the opportunity to comment and has attached comments to both the permit and the fact sheet.

Thank you for considering these comments and the time you and Bud Derrick spent in workshops listening to our needs in regard to this permit. If you have any questions, please call Doug Chapin, FFTF Division, on (509) 373-9396, or Mary Jarvis, of my staff, on (509) 376-2256.

Sincerely,

Joel Hebdon, Director
 Regulatory Compliance and Analysis Division

RCA:MFJ

Attachment

cc w/attach:
 Environmental Portal, LMSI
 B. J. Dixon, FHI
 M. E. Eby, FHI
 R. H. Engelmann, FHI
 D. A. Isom, Admin. Record, LMSI
 C. A. Kooiker, FHI
 R. Ranade, FHI

59898

Attachment

Comments on Draft SWD Permit No. ST-4501:

- Page 1 of 15: In the lower left box, change the Facility Location to read: "U.S. Department of Energy, Richland Operations Office, 400 Area/Fast Flux Test Facility (FFTF) complex, Richland, Washington."
- Page 2 of 15, "Table of Contents:" Make sure the TOC's wording and page numbers are consistent with the permit's text and page numbers and/or vice versa.
- Page 4 of 15: Move "A. EFFLUENT LIMITATIONS" from the table title and move it to the beginning title of section while ensuring that text (now above table) is appropriately left-justified.
- Page 7 of 15: Ensure consistency of hyphenated or non-hyphenated spelling of the words "Non-Compliance" throughout draft permit titles and/or text.
- Page 8 of 15: Under "Section S.4, Facility Loading," bulletize the two lines beginning with the word "Maximum," for text/format consistency.
- Page 9 of 15: Under "B. Bypass Procedures," under the bulleted text beginning with "*Anticipated Bypass That Has...*" hyphenate the 3 paragraphs of text.
- Page 12 of 15: Under "General Conditions, G.1 Signatory Requirements," please confirm that this is the appropriate wording regarding the permit application signatories.
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Comments on Draft Fact Sheet for Draft SWD Permit No. ST-4501:

- On Page 2, "Summary," in the second line, replace the word "wastewater" with the clause "industrial process wastewater effluent...". Also in this section, change the last two sentences of the first paragraph to read as the following three sentences: "The facility is called the U.S. Department of Energy (DOE), Richland Operations Office (RL), 400 Area/Fast Flux Test Facility (FFTF) complex. This area/complex is located on the DOE's Hanford Site about 11 miles north of Richland, Washington. The 400 Area industrial process wastewater system discharges to two unlined infiltration ponds known as the 4608 Percolation Ponds B and C, and are located immediately north of the 400 Area fenced boundary.
- On Page 6, label the "General Information" table as Table 1 ... ensure that subsequent Table Nos. are changed accordingly with new table numbers corrected in corresponding text.
- On Page 6, in the "General Information" Table 1, change the "Facility Name" to read: "400 Area Industrial Wastewater Process System." Also, in this table, change the "Type of Treatment" to "Type of Discharge" and insert before the word effluent (column to the right), the clause "industrial process wastewater."
- On Page 6, "Background Information," "Description of Facility," change the first three lines of text in the opening paragraph to read as the following two sentences: "The 400 Area industrial process wastewater system collects and disposes of effluent from the U.S. Department of Energy, Richland Operations Office, 400 Area/FFTF complex facilities, which are located about 11 miles north of Richland, Washington. The system discharges to two unlined infiltration ponds known as the 4608 Percolation Ponds B and C, and are located immediately north of the 400

Area fenced boundary." Also, remove the word "unlined" from the next sentence in the paragraph.

- On Page 9, under "Treatment Processes," replace the entire paragraph text with the following: "The 400 Area industrial process wastewater system discharges untreated effluent to the 4608 Percolation Ponds B and C via a pipeline. A summary of the discharge sources is included below."
- On Page 12, please label and title the figure as "Figure 1 - U.S. Department of Energy, Hanford Site, Richland, Washington."
- On subsequent pages, please ensure that tables are appropriately renumbered, along with their reference numbers called out in the text, based on the "General Information" table now being labeled "Table 1" on Page 6. Also, remove all shading from Table text for consistency ... all table fonts should be consistent with wording or category titles unshaded.
- Ensure that text references are consistent with those cited in "Appendix A- Bibliography" and vice versa, as appropriate. Likewise comment for "Appendix C - Glossary of Terms," while checking on any other appropriate terms that should be added from the text.