



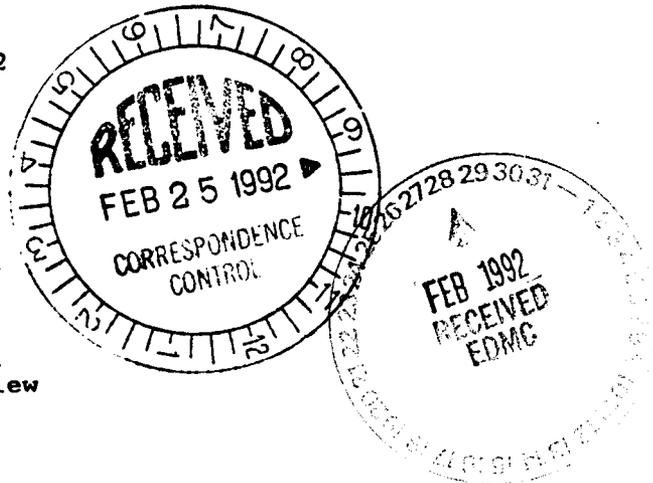
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

February 11, 1992

Mr. James E. Rasmussen
United States Department of Energy
P.O. Box 550
Richland, Washington 99352



Re: Sampling and Analysis Plan Review

Dear Mr. Rasmussen:

I am currently reviewing the various sampling and analysis plans that you have submitted. I am troubled by a recurrent statement in these plans.

The PUREX CSL Sampling and Analysis Plan says:

"This stream has been designated non-hazardous by comparing sample data to the dangerous waste criteria (WAC-173-303-100) and dangerous waste characteristics (WAC 173-303-090). The stream specific report³ provides detailed documentation of this comparison."

The Plutonium Finishing Plant Wastewater Sampling and Analysis Plan says:

"Past sampling, analysis, and process knowledge have indicated this stream is non-hazardous. The stream has previously been designated non-hazardous by comparing sample data to the dangerous waste criteria (WAC-173-303-100) and dangerous waste characteristics (173-303-090). Detailed documentation is provided in the PFP Wastewater Stream Specific Report (WHX-EP-0342, Addendum 8).

The UO₃ Plant to U-14 Ditch SAP quotes the Stream Specific Report in a more innocuous context.

It is my understanding that this office rejected the Stream Specific Report(s). It is certain that we do not feel that waste designation is justified by these reports.

Is the inclusion of these paragraphs a devious attempt to gain approval of the stream specific reports by combining them in another submission? We will certainly not accept the stream specific reports as a justification for diluting waste streams before sampling.

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I am attempting to work out some useful compromise to the existing problems in sampling and analysis. I will find it difficult to do so if old disputes are resurrected.

Sincerely,



Gary Anderson, P.E.
Environmental Engineer 3
Department of Ecology

cc: E.A. Bracken, DOE
Dan Duncan, EPA
T. Veneziano, WHC
Toby Michelena
Dave Nylander
David Jansen

