



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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January 27, 1992



Mr. R.D. Izatt  
United States Department of Energy  
P.O. Box 550  
Richland, Washington 99352

**Re: BAT/AKART Study, Decontamination Laundry Facility**

Dear Mr. Izatt:

I have reviewed the "Best Available Technology/All Known and Reasonable Methods of Technology Analysis and Treatability Study Report, Decontamination Laundry Facility, Westinghouse Hanford Facility, Project B-503" submitted to us by your department.

As a practical matter, an AKART study establishes those hazardous substances for which there is no practical treatment (so called exceedances), thus requiring that the usual and statutory limits on these substances be waived.

This report lists a number of exceedances, but does not justify their waiver. I find this report deficient for the following reasons:

This is an end-of-pipe, treat whatever comes out study. The section dealing with source control alternatives is superficial. Any study of this sort should inventory the chemicals used in the process, attempt to trace all unexpected substances encountered and present methods to eliminate toxics from the discharge. Cyanide, TOC, ammonia, hydrazine, arsenic, and vanadium all fall in this category

All exceedances listed were based on the performance of the bench scale test. This is overly conservative. Please approximate the result of routing all suspected hazardous substances through the treatment process.

Insufficient justification is given for eliminating ultrafiltration and selecting the recirculation percentage. Please justify these actions using the AKART procedure.



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Please positively identify the source of bis 2-ethylhexyl phthalate. If this is an inevitable result of using PVC pipe, present research showing this to be so.

If you have further questions concerning this letter, please call me at (206) 438-7558.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Anderson". The signature is written in dark ink and is positioned above the typed name and title.

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

GA:ga

cc: Dan Duncan, EPA  
~~████████████████████~~  
Rick Oldham, WHC  
Toby Michelena, Ecology  
Dave Nylander, Ecology  
David Jansen, Ecology

# CORRESPONDENCE DISTRIBUTION COVERSHEET

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**Subject:** BAT/AKART STUDY, DECONTAMINATION LAUNDRY FACILITY

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