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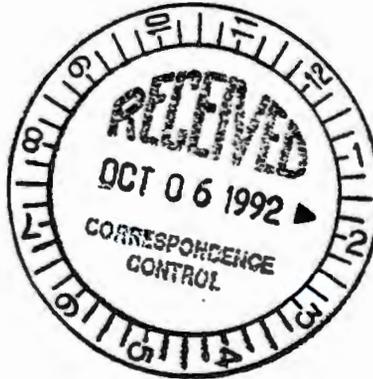
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

September 29, 1992

Mr. Steven Wisness
Hanford Project Manager
US Department of Energy
P.O. Box 550, MS: A5-15
Richland, WA 99352

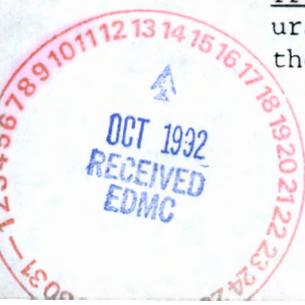


Dear Mr. Wisness:

Re: Continued Discharges to the 300 Area Process Trenches (M-17-06)

On December 19, 1991, The Washington State Department of Ecology (Ecology) and the Environmental Protection Agency (EPA) notified you of our decision to delete Milestone M-17-06 and create five new milestones. This decision was based on the need to obtain additional information on the environmental impacts of continued discharges to the 300 Area Process Trenches. We also stated that by September 30, 1992, EPA and Ecology would make a determination on continued discharges. The following is our evaluation of Milestones M-17-06A, B, C, D, and E, and a description of appropriate requirements for continued use of the trenches.

Our analysis of the five milestones listed above is that they were only partially met. M-17-06A (limit the discharge to less than or equal to 400 gallons per minute) was completed on time and in an acceptable manner. The conclusions in the M-17-06B report (300 Area Process Sewer Effluent Characterization) is in regulatory review and we have some concerns about the incorrect use of data qualifiers. Additional comments will be provided separately. The M-17-06C report (300 Area Process Trenches shutdown plan) did not fulfill the intent of the milestone. The report did not fully identify the TPA milestones that would be adversely impacted by shutdown of the trenches. The M-17-06D report (316-5 Process Trenches ERA final report) was encouraging but inconclusive. Significant quantities of hazardous and radioactive material were removed from both trenches, however, the west trench remains a concern. The M-17-06E report (Assessment of Potential Environmental Impacts from Continued Discharge to the 300 Area Process Trenches at Hanford) was submitted on time. The report states that uranium may still be entering the aquifer from continued discharges to the trenches, although at much reduced levels.



Steven Wisness
Page 2
September 29, 1992

After a detailed evaluation of available data, potential impacts to the environment, and likely impacts on TPA milestones if the trenches were required to be shut down, we have made a determination that is consistent with overall TPA objectives. This decision is to allow continued discharges to the process trenches until the 300 Area treated effluent disposal facility is operational in December 1994, as identified in M-17-09. Due to the importance of minimizing any adverse environmental impacts from continued use of the trenches, and to assure an aggressive program is implemented to achieve M-17-06 objectives, we have identified additional requirements for continued discharges. These requirements are as follows:

- Develop a new milestone to permanently abandon the West Process Trench (due to the higher radionuclide concentrations), through physical disconnection or blocking, leaving only the East trench for discharge (17-06H).
- Implement a pipe clean out program that recovers pipe residue from active pipes leading to the trenches. Alternative proposals may be offered by USDOE. All inactive pipes should be capped and remediated in conjunction with the operable unit.
- Revise and submit the sampling and analysis plan that addresses protocol sampling and routine effluent monitoring for review and approval. Submit monthly reports on the quantity, quality, and supporting sample documentation for effluent entering the trenches.
- Make the December 1992, 300 gallons per minute target date into a new milestone (17-06F).
- Develop a new milestone for 200 gallons per minute for December 1993 (17-06G). This milestone would be expanded to ensure that facilities that do not support waste management and/or environmental restoration activities should be a flow reduction priority.
- Install a flow meter capable of measuring proposed flows of 200 to 300 gallons per minute.
- Provide Ecology with copies of or easy access to as-built piping diagrams for all active and inactive 300 Area facilities.
- Schedule monthly or bimonthly meetings to discuss status of the effluent treatment facility (similar to meetings held for the C-018 project).

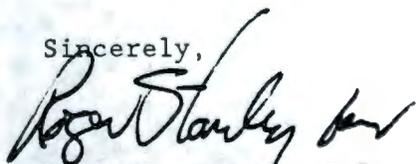
Steven Wisness

Page 3

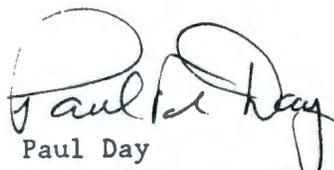
September 29, 1992

Other conditions that may be identified by the three parties or the public will be analyzed for suitability and implementation. Please have your staff contact Mr. Richard Hibbard (Ecology) at (206) 493-9367, Melodie Selby (Ecology/Kennewick) at (509) 546-2967, and Mr. David Einan (EPA) at (509) 376-3883, to arrange a convenient time to discuss implementation of the requirements identified above.

Sincerely,



David B. Jansen, P.E.
Hanford Project Manager
Department of Ecology



Paul Day
Hanford Project Manager
U.S. Environmental Protection Agency

DBJ:PD:jw

cc: Becky Austin, WHC
Dave Nylander, Ecology
Joe Stohr, Ecology

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: P. T. Day, Ecology Addressee: S. H. Wisness, RL Correspondence No.: Incoming: 9206580

Subject: CONTINUED DISCHARGES TO THE 300 AREA PROCESS TRENCHES (M-17-06)

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