

START



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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

May 11, 1992

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

Re: 242-A Evaporator Cooling Water Sampling and Analysis Plan

Dear Mr. Izatt:

I have reviewed the 242-A Evaporator Cooling Water Sampling and Analysis Plan, WHC-SD-WM-EV-078, Revision 1. I have the following comments:

1. **Sampling Locations.** The hazardous waste regulations define the amount of waste of concern to be a pint or a pound. As a result, the proposal to not sample some intermittent and relatively small streams is not acceptable to this office. Since this facility has been renovated since the Tri-Party Agreement was signed, it is astonishing that no sampling provisions for these sources were designed into the structure. We do not regard cutting into the pipes as an unacceptable condition. The only two reasons that would relieve you of the necessity of sampling the proposed waste streams would be ALARA or unacceptable cost (AKART).
2. Given the evidence presented, it has not been demonstrated to this office that steam condensate is universally innocuous. This question has been asked as a general question concerning the overall wastestream problem, and as such is not a particular problem at this site.
3. Please check the container list on pages 16 and 17, to insure that it conforms to 40 CFR 136.3.

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

Sincerely,

Gary Anderson, P.E.
Environmental Engineer 3
Nuclear and Mixed Waste Management Program

GA:jw

- cc: Dan Duncan, EPA
J.M.Hennig, DOE
R.M.Hiegel, DOE
Rick Oldham, WHC
J.E. Rasmussen, DOE
Doug Sherwood, EPA
T. Veneziano, WHC



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Author	Addressee	Correspondence No.
Gary Anderson, Ecology	R. D. Izatt, RL	Incoming:9203010

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