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United States
Environmental Protection
Agency

Region 10
Hanford Project Office
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Richland WA 99352

9203513



May 20, 1992



Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: Review of the 242-S Evaporator Steam Condensate Sampling and Analysis Plan

Dear Mr. Wisness:

The U.S. Environmental Protection Agency (EPA) has completed the review of the 242-S Evaporator Steam Condensate Sampling and Analysis Plan.

The document is well written and adequately addresses the scope of the sampling activity. However, EPA does have two concerns with the plan. The list of analytes appears to be incomplete. The sampling matrix should include PCB's and total dissolved solids as well as testing for herbicides. If these substances will not be analyzed then the document should discuss reasons for not including these substances in at least the first sampling regime. In addition, the holding times for each sample should be specified.

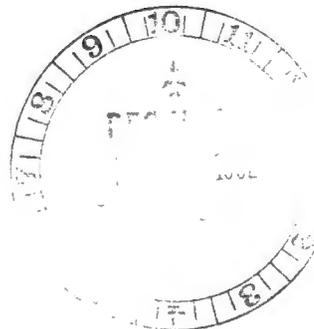
Also enclosed for your convenience are the general comments pertaining to the Liquid Effluent Sampling Quality Assurance Project Plan. If you have any comments or questions, please call me at (509) 376-8631.

Sincerely,

Dennis A. Faulk
Environmental Scientist

Enclosure

cc: Gary Anderson, Ecology
Joel Eacker, WHC
Jim Mecca, DOE
Dave Nylander, Ecology
Tim Veneziano, WHC



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LIQUID EFFLUENT SAMPLING QUALITY ASSURANCE PROJECT PLAN

1. Section 2.1 Objectives, page 2-1

Comment: Two additional objectives should be added to the Objectives section of the QAPjP. One objective not included in the current plan is "...provide data to support a RCRA delisting petition for those streams designated as dangerous waste". The second objective that should be included is "...provide data to support National Pollutant Discharge Elimination System permits or permit modifications subject to future surface water discharge".

Recommendation: Modify objectives.

2. Section 3.0 Figure 3.2, page 3-2

Comment: Figure 3.1 needs to be revised to identify the organization responsible for data reporting.

3. Section 10.0 Internal Quality Control, page 10-11

Comment: The QAPjP suggests that in cases where a one-time single analysis is performed, these requirements may be limited in scope. EPA considers this approach to be severely flawed. If DOE's position is to obtain a minimum number of samples, they then should consider a more thorough internal quality control program to ensure that those analyses are valid. One example of the importance of internal quality control can be illustrated by a review of past liquid effluent data. A review of previous UO₃ Plant Process Condensate analyses indicate that field, equipment, or trip blanks have not been collected and analyzed for metals, cyanide, or semi-volatile organics, therefore, if these constituents are found in the liquid effluent Ecology and EPA will attribute those contaminants to the process. If these constituents exceed effluent quality criteria, treatment for these substances may be required. EPA considers blanks, splits, and duplicates to be the most cost effective method to identify the presence of sample contaminants not attributable to the process in liquid effluent samples.

Recommendation: Consider the use of additional internal quality control measures for these liquid effluents and analytes previously identified in Hanford liquid effluents to verify their presence in these liquids as opposed to sample contaminants introduced into the sample in either the laboratory or in the field.

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4. Section 15.0 Quality Assurance Reports, page 15-1

Comment: Data reporting language is inconsistent with the TPA. EPA and Ecology can request unvalidated data any time after completion of analysis. EPA does not consider specific quality assurance reports to be a requirement. EPA will request data packages from the appropriate organization and perform independent reviews of the QA/QC program. This effort will be performed on selected samples identified by EPA through a written request.

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Subject: REVIEW OF THE 242-S EVAPORATOR STEAM CONDENSATE SAMPLING AND ANALYSIS PLAN

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