



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
3100 Port of Benton Blvd • Richland, WA 99354 • 509-372-7950  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 6, 2020

20-NWP-041

Brian T. Vance, Manager  
United States Department of Energy  
Richland Operations Office  
PO Box 550, MSIN: H5-20  
Richland, Washington 99352

Re: Department of Ecology's Review of *L-897 Central Plateau Water Treatment Facility  
BAT/AKART Analysis*, Rev. 0

Reference: United States Department of Energy, October 7, 2019, *BAT/AKART Analysis,  
Project L-897, Central Plateau Water Treatment Facility*, HNF-ENG-64305, Rev 0

Dear Brian T. Vance:

The Washington Department of Ecology (Ecology) has completed our review of your submittal for the Best Available Technologies/All Known Available and Reasonable Technologies (BAT/AKART) analysis for Project L-897, Central Plateau Water Treatment Facility (Reference). In a meeting on December 17, 2018, Ecology requested an assessment of the facility's process wastewater management to ensure the project's discharge can meet the permitted discharge limits at the Treated Effluent Disposal Facility, subject to State Waste Discharge Permit ST0004502 (ST4502).

Ecology does not have any substantial comments on the submitted BAT/AKART and accepts the document as justification that project L-897 employs the use of all known, available and reasonable methods to prevent and control the discharge of wastes into the waters of the state in accordance with Washington Administrative Code (WAC) 173-216-020(1). The assumptions and claims in the BAT/AKART must be substantiated during the facility's startup and commissioning phases. The United States Department of Energy (USDOE) must be prepared to implement adaptive management options for reducing chloroform and total trihalomethanes in the waste stream, as discussed in Section 6 of the BAT/AKART, if the proposed process wastewater management plan does not maintain compliance with ST4502. In such case, failure to implement these management options may result in exceedance of permitted limits and, thus, violation of permit conditions resulting in enforcement action.



Brian T. Vance  
March 6, 2020  
Page 2 of 2

20-NWP-041

Ecology encourages water conservation efforts statewide, including on the Hanford Site. The BAT/AKART analysis states:

*“The [facility] will include provisions to divert and blend raw water, referred to as Export Water, with the process wastewater stream. This administrative control can be exercised as needed to manage the concentration of constituents in the process wastewater. Specifically, this practice may be used during monthly CIP [clean in place] cleanings to manage DBP [disinfection byproduct] concentrations...”*

Increasing the volume of wastewater to dilute the concentration of constituents seems to be a heavily relied upon management option for achieving compliance with ST4502. It is important that USDOE considers future inputs to the Treated Effluent Disposal Facility (TEDF) system and ensures that the combination of these inputs remains below the flow limits set forth in the ST4502 permit.

If you have questions or need further information, please contact Katie Hall, Permit Lead, at [katie.hall@ecy.wa.gov](mailto:katie.hall@ecy.wa.gov) or (509) 372-7885 or John Temple, Facility Transition Project Manager, at [john.temple@ecy.wa.gov](mailto:john.temple@ecy.wa.gov) or (509) 372-7929.

Sincerely,



Theresa Howell  
Acting Waste Management Manager  
Nuclear Waste Program

kh/jlg

cc electronic:

Rana Evans, USDOE-ORP  
Joseph Sondag, USDOE-ORP  
Doug Hildebrand, USDOE-RL  
Allison Wright, USDOE-RL  
Dan Parr, MSA  
Jennifer Russell, MSA  
James Hamilton, WRPS  
Doug Hendrickson, WRPS  
Behr Turner, WRPS  
Katie Hall, Ecology

Theresa Howell, Ecology  
Joseph Lippold, Ecology  
Ellie Ott, Ecology  
John Temple, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
USDOE ORP Correspondence Control  
USDOE RL Correspondence Control  
WRPS Correspondence Control

cc: NWP Central File