



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 1, 1992

Mr. Ken Mosbaugh
U.S. Environmental Protection Agency
4660 151st Street
Seattle, WA 98066

Dear Mr. Mosbaugh:

Re: 300 Area Outfall Dilution Meeting, September 23, 1992 (M-17-09)

Thank you for inviting us to attend the meeting on September 23, 1992. Having now had the time to read the Engineering Summary Report, Hanford 300 Area, Treated Effluent Disposal Facility, Project L-045H. I would like to comment on the report and the meeting as follows:

The report is technically excellent. The recommended treatment alternative is acceptable to this office. Our exception to the report is strictly a regulatory matter. We prefer that end-of-treatment, detection limit restrictions be placed on effluent rather than undetectable limits being placed on the fringes of theoretical plumes. It appears that the recommended alternative will achieve detection limits at the end of the pipe. In addition, we would approve an end-of-pipe temperature limit higher than regulation as a necessary tradeoff for the zero residue UV/Oxidation process, rather than as a dilution limit. We will not approve any hazardous substance (much less a cumulative one) being treated by dilution in a mixing zone.

Our regulations require that All Known Available and Reasonable Treatments (AKART) be applied to the wastewater before diluting in a mixing zone. This test is analogous to the BAT test required under federal regulations. Since this study and others conducted at the Hanford Site, have demonstrated that techniques exist which will produce what is virtually de-ionized water, the BAT/AKART test is an economic one. What is required is a determination of what unit cost of removal (mass/dollars) is a reasonable one, for any or all facilities at Hanford. This has not been done.

Furthermore, we are unaware of the existence of any economic test for public non-profit organizations. The intent of the BAT/AKART test was to protect economically productive industry.

We do not know of any precedent BAT/AKART study that has been done to establish what is reasonable cost for treating the hazardous wastes from



Ken Mosbaugh
Page 2
October 1, 1992

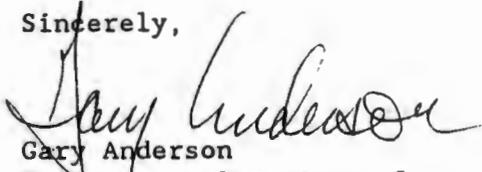
nuclear weapons manufacturing. Until we do, we will not allow mixing zones, just as our regulations require.

An attempt was made at our meeting to establish that the 300 Area is analogous to a pulp mill, so that mixing zone rules for pulp mill would apply to Hanford. To imply that the manufacture of grocery bags equates to the manufacture of weapons grade plutonium does reason a disservice.

To restate our position, we will not approve any permit that includes mixing zones until a rational economic test is applied to BAT/AKART for the Hanford reservation.

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

Sincerely,


Gary Anderson
Environmental Engineer 3
Nuclear & Mixed Waste Management

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Subject: 300 AREA OUTFALL DILUTION MEETING, SEPTEMBER 23, 1992 (M-17-09)

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