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Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

OCT 20 1992

93-RPB-016

Mr. Paul Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. David Jansen  
Hanford Project Manager  
State of Washington  
Department of Ecology  
P. O. Box 47600  
Olympia, Washington 98504-7600

Dear Messrs. Day and Jansen:

CONTINUED DISCHARGE TO THE 300 AREA PROCESS TRENCHES (M-17-06)

Reference: Letter, D. B. Jansen, Ecology, and P. T. Day, EPA, to  
S. H. Wisness, RL, "Continued Discharges to the 300 Area Process  
Trenches (M-17-06)," dated September 29, 1992. - 0023797

We have received your letter of September 29, 1992, which outlines your approval for the continued discharge of the 300 Area Process Sewer to the 300 Area Process Trenches. We are currently evaluating your proposals for additional requirements and expect to discuss them with you in the very near future.

Of particular concern to us in the U.S. Department of Energy, Richland Field Office (RL) is the assertion in your September 29, 1992, letter that Milestones M-17-06A through E were only partially met. We do not concur and question your assertion.

As you recognized in your letter, the purpose of interim milestones M-17-06B through E was to provide your agencies with sufficient information to make a decision regarding the continued discharge of the 300 Area Process Sewer to the trenches. Your letter states that you have made the decision to allow discharge to the trenches until December 1994, at which time the effluent will be treated by the 300 Area Treated Effluent Disposal Facility (M-17-09). Since your agencies had sufficient information not only to make this decision but also to outline several Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestone proposals for additional restrictions, it is our opinion that your agencies were provided with adequate information thereby meeting both the intent and the provisions of the milestones.

It should also be pointed out that interim milestones M-17-06B through E were



Messrs. Day and Jansen  
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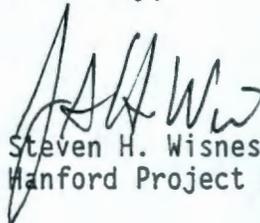
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submitted to your agencies in March, April, and July as scheduled. The referenced letter contained our first indication of your dissatisfaction with these submittals. RL still has not received your comments on these submittals and we are somewhat at a loss that the milestones would be declared not met with no previous communication to us. In fact, these reports are not designated as either a secondary or primary document as defined in the Tri-Party Agreement and do not require approval.

As a final note, Milestone M-17-06A, which required a 400-gallon-per-minute flow restriction by December 1991, was met. In fact, not only has RL met this flow restriction but has embarked on an aggressive flow reduction campaign in the 300 Area. Flow reductions that have occurred to date in the 300 Area have exceeded our expectations and are a significant accomplishment in the ongoing task of environmental management at Hanford.

We look forward to discussing the provisions you outlined in your letter. The Tri-Party Agreement Project Managers will include the 300 Area Process Trench in their on-site review of Tri-Party Agreement milestone activities which is tentatively scheduled to occur on October 21, 1992. If you have any further concerns, please do not hesitate to contact me at (509) 376-6798 or Mr. Lance Mamiya at (509) 376-1471.

Sincerely,

  
Steven H. Wisness  
Hanford Project Manager

EAP:SDS

cc: B. A. Austin, WHC



