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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 13, 1992

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

Re: 200 Area Treated Effluent Disposal Facility (Project W-049H)
Wastewater Engineering Report.

Dear Mr. Izatt:

I have reviewed the "200 Area Treated Effluent Disposal Facility (Project W-049H) Wastewater Engineering Report" WHC-HD-W049H-ER-003. I have the following comments:

You are to be commended for your thoroughness in identifying the multiple sources in each of the contributing facilities. Further, the emphasis on source reduction in the treatment alternatives presented is exemplary.

The report is flawed by its fragmentary nature. Each facility is independent of all other facilities. Almost all the facilities reporting exceedances report trichloroethane and aluminum as some sort of inevitable pollutant while recognizing that these pollutants originate in the 284W Power Plant water treatment facility. The report for the 284W Power Plant neither acknowledges the fact that it fundamentally pollutes the water for a number of other facilities, nor does it propose an alternative sanitary water treatment system to reduce the volume of alum sludge or chlorine in the sanitary water system.

The water distribution system at the Hanford Facility seems to be controlled by observed overflow and telephone. No site-wide control system is proposed here since the diluting overflows occur at separate facilities. The technology for central control of water system distribution networks is well known, and should be used to prevent waste and dilution in the Hanford system.

The system of wastestream classification proposed in Appendix U is commendable in its effort to simplify and classify a multiplicity of streams in to a convenient system. The difficulty with this classification is that it is not backed by fact. A number of streams are baldly presented as "clean effluents" without little if any supporting data. Boiler discharge is assumed to be the raw water concentration times a factor of five. This is neither scientific nor acceptable to this office. Please submit scientifically valid data to this office demonstrating the composition of boiler discharge, yard and roof storm water and evaporative cooling water.



Mr. R.D. Izatt
March 13, 1992
Page 2

The last and most glaring deficiency of this report is that it proposes mixing effluents with different concentrations of pollutants before treatment or testing. This is illegal. Assuming, and only assuming that your proposed division of effluents into potentially contaminated and clean effluents is validated, the proposal to mix them is impermissible.

This is not news to you. After this office informed you of this requirement, and after we rejected the stream characterization reports because they sampled diluted effluents, you asked for and got a meeting with our Water Quality Program representative who told you the same thing.

It is outside the scope of this letter to speculate as to your reasons for ignoring the clear directives you have received, but suffice it to say that no further review of your proposals for these wastestreams will be accepted for review until sampling and treatment plans eliminate combined and diluted wastestreams.

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

Sincerely,



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

GA:jw

cc: Dan Duncan, EPA
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Subject: 200 AREA TREATED EFFLUENT DISPOSAL FACILITY (PROJECT W-049H)
WASTEWATER ENGINEERING REPORT

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