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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

February 24, 1992



Mr. Steve Wisness
U. S. Department of Energy
P. O. Box 550
Richland, Washington 99352

Re: 242-A Evaporator, Liquid Effluent Retention Facility, C-018H
Wastewater Treatment Facility, and Liquid Effluent Consent Order

Dear Mr. Wisness:

I have finally had the time to consolidate a number of documents relating to the treatment of the 242-A Evaporator Process Condensate for review. I am disappointed to conclude from the information provided by the U.S. Department of Energy (USDOE) that it appears you do not intend to meet, or are unable to meet the date which you consented to initiate full scale hot operations for the Project C-018H as recently as December 23, 1991. Were you aware of the schedule slippage when you signed the effluent Consent Order?

The U.S. Environmental Protection Agency's (USEPA) letter from Paul Day to you dated October 11, 1991, expressed concern about being able to process your delisting petition for the Evaporator Process Condensate within 14 months to support the initiation of the full scale hot operations by October 1994. This letter encourages the USDOE to accelerate the restart of the Evaporator from the agreed to June 1992 commitment if possible. However, during my recent discussions with the USEPA regarding the schedule for the C-018H Treatment Facility Pilot Plant, it was revealed the startup date for the 242-A Evaporator has now been pushed back to an October/December 1992 time frame. Has the USDOE formally informed Ecology that the June 1992 initiation of full scale hot operation of the C-018H Treatment Facility Pilot Plant agreed to in the Consent Order is not anticipated to be met?

The Hanford Federal Facility Agreement and Consent Order (FFACO) Milestone M-26-03 requires the USDOE to cease discharge to the LERF by December 1994. Milestone M-26-04 requires the USDOE to decommission the LERF by June 1995. Since the 242-A Evaporator has evidently been rescheduled without Ecology's consent until late fall of 1992, the LERF has an operational life of two to two and one half years. Yet, a number of documents have recently been submitted to Ecology that project the operational life span of LERF as five to seven years or state the LERF will operate until Project C-018H is operational. It appears that the USDOE is attempting to prepare Ecology for a number of schedule extension requests. Is this a correct interpretation?

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Please provide any clarifying explanations to explain these observed discrepancies and formally inform Ecology if the date the USDOE committed to will not be met. If you have any questions and/or comments, please contact me at (206) 459-6725.

Sincerely,



Paul R. Stasch
Compliance Specialist

PS:jw

cc: Cliff Clark, USDOE-RL
Paul Day, USEPA-RL
T. Venziano, WHC/AR
Dave Jansen, Ecology
Dave Nylander, Ecology
Toby Michelena, Ecology

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SUBJECT: 242-A EVAPORATOR, LIQUID EFFLUENT RETENTION FACILITY, C-018H
 WASTEWATER TREATMENT FACILITY, AND LIQUID EFFLUENT CONSENT ORDER

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