



June 30, 1992

Paul M. Pak
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: 216-T-4 Wastewater Sampling and Analysis Plan and
216-T-1 Laboratory Wastewater Stream Sampling and Analysis
Plan

Dear Mr. Pak:

Enclosed is a copy of the U.S. Environmental Protection Agency's (EPA) comments on the 216-T-4 Wastewater Sampling and Analysis Plan and 216-T-1 Laboratory Wastewater Stream Sampling and Analysis Plan.

Each Sampling and Analysis Plan (SAP) is very well written and both meet the intent of Milestone M-17-13. We conditionally approve both SAP's on the basis that our comments will be incorporated.

EPA apologizes for the extended review time and does not expect future review times to be as extensive.

Sincerely;

Paul R. Beaver
Operable Unit Manager

Enclosure

cc: G. Anderson, Ecology, w/Encl.
J. Mecca, DOE, w/Encl.
~~T. Veneziano~~ WHC, w/Encl.
D. Nylander, Ecology, w/Encl.



216-T-4 Wastewater Sampling and Analysis Plan

1. Page 5, Section 3.1.1, third paragraph.

The 214 Chemical Storage Building is not shown on any figure.

A description of the 2715-TA building is needed in this section.

2. Page 9, Section 3.2.1.1, second paragraph, second sentence.

"Shippingport" should be inserted before "reactor" in this sentence for clarification.

3. Page 13, Section 3.2.1.1, last paragraph, last sentence.

The date when the stream is scheduled to be eliminated needs to be stated here. This information can be used to update future sampling and analysis schedules.

4. Page 13, Section 3.2.1.2, first sentence.

The dimensions are inconsistent with those contained in the The T-Plant Aggregate Area Management Study.

5. Page 13, Section 3.2.1.2, second paragraph

According to The T Plant Wastewater Stream Specific Report, 221-T has a daily flow of 0-100 gallons, 221-TA has a daily flow of 0-20 gallons. This discrepancy needs to be rectified.

6. Page 15, Section 3.2.1.4

The date when the stream is scheduled to be eliminated needs to be stated here. This information can be used to update future sampling and analysis schedules.

7. Page 17, Section 3.2.2.3

According to the SAP, if radioactive contamination is found in the sump, the liquid is not sent to the 216-T-4 Wastewater stream. There is no mention of where it is sent or how it is disposed of. This information needs to be included.

8. Page 17, Section 3.2.2.4

How is the flow rate estimated? Is it estimated over the entire year or only over the summer months when the swamp cooler is in operation? The flow rate should be an average over the summer months only along with a maximum daily flow.

9. Page 19, Section 3.2.3, first paragraph, second to last sentence.

It is stated that no effluent has been sent to the ditch for several years. Several years is not an adequate account of time. The Plan should be more specific about time frames.

10. Page 22, Section 4.0, first sentence

Who does The Environmental Protection Programs group belong to? (ie; WHC or DOE ?) This should be stated here.

11. Page 26, Section 5.2, second paragraph

EPA recommends that samples should not be taken within one month of each other in order to help insure more representative sampling of the waste stream.

216-T-1 Laboratory Wastewater Stream Sampling and analysis Plan

1. Page 9, Section 3.1.3, last paragraph

The text states that "the procedure allowed for the solution to be transferred to the 221-T Building Head End." The text should also state what happens to the waste stream from there (ie: is the waste treated, rerouted to a double shell tank...etc?).

2. Page 10, Section 3.1.4, first paragraph

The text states that the ditch is 30 ft. wide at the top, 6 ft. wide at the bottom, average depth 4 ft., and a side slope of 1:1.5. The text needs to be corrected to reflect a more correct set of dimensions.

CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: 216-T-4 WASTEWATER SAMPLING AND ANALYSIS PLAN AND 216-T-1 LABORATORY
WASTEWATER STREAM SAMPLING AND ANALYSIS PLAN

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