

# START

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TO: Cliff Clark: DOE-RL

10/26/92

From: Dan Duncan/Cathy Massimino: EPA

1. The following additional information is provided regarding our initial review of your October 21 and 23, 1992 submittals. The referenced RD&D Draft Permit Conditions are attached for your review and information.

o 3,000 Gallon Tank Integrity Assessment: Draft Permit Condition IV.C.3 requires that the structural integrity of the double shell tanks be performed every five (5) years. The integrity assessment must be included in the Operating Record.

o LERF Ventilation System: Draft Permit Condition V.D.3.a. specifies that the LERF Units shall be vented to a ventilation system designed, operated, monitored, and maintained equivalent or superior to the system in Section 4.1.3.

o Operating Parameter Review: Draft Permit Condition IV.C.2.a. requires that the Operating Parameters to be reviewed prior to startup of the RD&D Waste Water Pilot Plant.

o VOC Analyzer Breakthrough: The alarm and visual alarm control setpoint will be set at 1 ppm in the RD&D Permit. Draft Permit Condition IV.C.3.a. specifies breakthrough of the first stage charcoal absorber will be considered to be 1 ppm.

o Catch Tank Capacity: Additional information verifying the capacity of the catch tank is required i.e. the basis for the 199 gallons.

2. Cathy and I will be available on November 5, 1992 at 9:00 am for a conference call to discuss these and any other items.

3. If any additional information is required, call me on 3-6693.

cc: Steve Skurla: WHC

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OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL** # of pages **2**

To <b>STEVE SKURLA</b>	From <b>DAN DUNCAN</b>
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\*IV.C.2.a. The Permittees shall submit to the Director and the Administrator a written assessment reviewed and certified by an independent, qualified registered professional engineer, in accordance with Section 270.11(d) and WAC 173-303-810 attesting whether the control setpoints which activate feed pump shutdown for units identified in permit condition V.A. are set at above or below the level which result in the hazard specified on Table 4-4 of Attachment 4. Based on this assessment the Permittees shall modify any control setpoints that do not activate feed pump shutdown prior to occurrence of the hazard. The Permittee shall submit with the written assessment revisions to Attachment 4 of this permit to reflect these corrections to the control setpoints. These revisions to Attachment 4 of this permit to reflect these corrections to the control setpoints shall not be considered modifications to this permit and shall be implemented in accordance with permit condition II.N.

\*IV.C.3. The Permittees shall review, pursuant to Section 264.192(b) and WAC 173-303-640(2)(c), the structural integrity of the two Double Shell Tanks every five (5) years starting from the date the two Double Shell Tanks are installed. The initial structural integrity review shall also include testing for tightness pursuant to Section 264.192(d) and WAC 173-303-640(2)(e). Results of the integrity assessments shall be included in the Operating Record accessible at the facility. If either of the two Double Shell Tanks are found to be leaking or unfit for service, it must be immediately removed from service and the Permittees shall comply with Section 264.196 and WAC 173-303-640(7). The Permittees may not return the tank to service until he/she has obtained the required certification.

\*V.D.2.h. Subsection 4.1.3.2., page 4-6, last paragraph, sixth sentence, revise as follows: Breakthrough of the first stage charcoal adsorber will be considered to be at 1 parts per million as shown on the organic vapor analyzer.

\*V.D.3.a. The Liquid Effluent Retention Facility Units identified in permit condition V.A. shall be vented to a ventilation system designed, operated, monitored and maintained equivalent or superior to the system specified in Subsection 4.1.3, Figure 4-2, and Table 4-4 of Attachment 4 of this permit, Appendix 6, Appendix 5A, of this Permit and Attachment 7, Appendix 5B, of this Permit, for the 1706-KE Building Units identified in permit condition V.A.