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Department of Energy

Richland Field Office

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93-RPS-188

MAY 14 1993



Mr. George C. Hofer
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Roger Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Hofer and Stanley:

INTERIM OPERATING RESTRICTIONS FOR THE 300 AREA PROCESS TRENCHES (M-17-06)

At the recent meeting discussing interim operating restrictions for the 300 Area Process Trenches held among the U.S. Department of Energy, Richland Operations Office (RL), the State of Washington Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA), tentative agreements were made between members of our respective staffs. This letter serves to document those agreements (Enclosure 1), to transmit a proposed change to interim milestone M-17-06 of the Hanford Federal Facility and Consent Order (Tri-Party Agreement) (Enclosure 2), and to document the transmittal of the engineering study, "300 Area Process Sewer Replacement," for Project L-070, "300 Area Process Sewer Piping Upgrade," to Dave Einan of EPA and to Rich Hibbard of Ecology.

EPA and Ecology stated their proposed terms and conditions for the continued operation of the 300 Area Process Trenches in the letter from Dave Jansen and Paul Day to myself, "Continued Discharges to the 300 Area Process Trenches (M-17-06)," dated September 29, 1992. Resolution to those terms and conditions can be found in Enclosure 1 of this letter.



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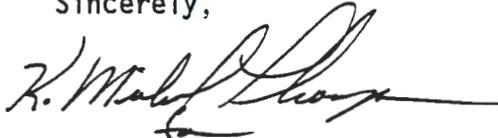
Messrs. Hofer and Stanley
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I would like to target the May 28, 1993, session of the Interagency Change Board, during the Tri-Party Agreement Project Managers' meeting, for final approval of this Tri-Party Agreement Change Package. If you have additional concerns regarding these responses or the proposed interim Tri-Party Agreement milestones, please contact me at (509) 376-6798.

Sincerely,



Steven H. Wisness
Hanford Project Manager

EAP:PJD

Enclosures:
Agreements, Operation of the 300 Area
Process Trenches
Tri-Party Agreement Change Request
M-17-93-03

cc w/enclosures:
B. Austin, WHC
T. Chikalla, PNL
R. Hibbard, Ecology
D. Jansen, Ecology
J. Stohr, Ecology
D. Nylander, Ecology
M. Selby, Ecology
D. Einan, EPA

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Enclosure 1

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Agreements Regarding Terms and Conditions for Operation
of the 300 Area Process Trenches

The following agreements were reached at a meeting held in HAPO, room 319, February 18, 1993, among representatives of the U.S. Department of Energy, Richland Operations Office (RL), the State of Washington Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), Westinghouse Hanford Company (WHC), and Pacific Northwest Laboratory (PNL). Topics discussed were stated in the EPA and Ecology letter of September 29, 1992, which outlined the proposed terms and conditions for continued discharge to the 300 Area Process Trenches.

1. "Permanently abandon the western-most trench of the 300 Area Process Trenches through physical disconnection or blocking, leaving only the east trench for discharge."

STATUS: Action completed. Discharge has been ceased to the west process trench. The west trench has been physically isolated; the flood gate is closed and locked; and the hand-wheel has been removed.

RESOLUTION: All three agencies agreed that the actions taken to date satisfied this requirement.

2. "Implement a pipe clean-out program that recovers pipe residue from active pipes leading to the trenches. An alternative proposal may be offered by RL. All inactive pipes should be capped and remediated in conjunction with the operable unit."

STATUS: This item has been discussed at length among our agencies. In 1991 RL evaluated different methods to clean-out or remediate the 300 Area Process Sewer piping in the engineering study for Project L-070. This engineering study concluded that clean-out of the piping was not advised due to the age, composition, and physical integrity of the piping. The engineering study proposed replacement of the piping as the most efficient and cost effective method of pipe remediation. Project L-070, "300 Area Process Sewer Piping Upgrade," will replace the active pipelines of the 300 Area Process Sewer system. Two copies of the engineering study are attached.

RL has reviewed this engineering study and finds the conclusions still valid. Project L-070 is a proposed fiscal year (FY) 1994 Congressional Line Item with an estimated cost at completion of \$9.9 million. Design of this project will be started in FY 1994 and the design completed by April 1995.

RESOLUTION: All three agencies agreed that Project L-070 would be the subject of an interim Tri-Party Agreement milestone in lieu of pipe clean-out. Proposed Tri-Party Agreement milestone wording for completion of Project L-070 design by April 1995 can be found in the attached Tri-Party Agreement Change Package (M-17-93-03).

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3. "Revise and submit the Sampling and Analysis Plan (SAP) that addresses protocol sampling and routine effluent monitoring for review and approval. Submit monthly reports on the quantity, quality, and supporting sample documentation for effluent entering the trench."

STATUS: The SAP for the 300 Area Process Sewer was submitted to EPA and Ecology by September 1991 in accordance with interim milestone M-17-12. EPA approved the SAP on March 23, 1993; Ecology has not approved it.

RESOLUTION: All three agencies agreed that sampling, monitoring, and reporting will be conducted in accordance with the terms and conditions of the approved 300 Area Process Sewer SAP. It is RL's intent to notify the regulators at least five days prior to initiation of sampling.

4. "Limit flow of the 300 Area Process Sewer to 300 gallons per minute by December 1992."

STATUS: See number 5 below.

RESOLUTION: See number 5 below.

5. "Limit flow of the 300 Area Process Sewer to less than 200 gpm by December 1993. This milestone would be expanded to ensure that facilities that do not support waste management and/or environmental restoration activities should be a flow reduction priority."

STATUS: The flow rate of the 300 Area Process Sewer to the 300 Area Process Trenches has been reduced dramatically over the past three years. At the beginning of the flow reduction activities, in March 1990, the flow rate averaged about 1600 gallons per minute (gpm). In less than two years, the flow rate had been reduced to less than 400 gpm (i.e., by December 1992). As the flow reduction program continues, continued reduction in flow rate will be less dramatic and will require more engineered solutions.

RL is confident of its ability to limit the 300 Area Process Sewer flow rate to less than 325 gpm on a monthly basis but cannot commit to lower flow rates until we are able to evaluate the effects of seasonal fluctuations and intermittent contributors on the current flow configurations.

RESOLUTION: All three agencies agreed that RL would limit the flow rate of the 300 Area Process Sewer to equal to or less than 325 gpm, calculated on a monthly basis. RL will propose completion of individual flow reduction activities as interim Tri-Party Agreement milestones. Proposed Tri-Party Agreement milestone wording for completion of these flow reduction activities can be found in the attached Tri-Party Agreement Change Package (M-17-93-03).

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6. "Install a flow meter capable of measuring proposed flow of 200 to 300 gallons per minute."

STATUS: Action completed. In early 1991 RL installed an ISCO Model 3220 flowmeter and an eighteen-inch Palmer Bowlus flume to better monitor flow to the 300 Area Process Sewer. At that time the flow rate was in excess of 1000 gallons per minute (gpm). Because of the comprehensive flow reduction programs that have occurred in the 300 Area, flows have been reduced below the range of the instrument. In December 1992 RL installed an ISCO Model 3230 flowmeter and a six-inch Parshal flume. The flowmeter was calibrated by the vendor in January 1993 and has since been used for flow measurements. This meter accurately measures flows below 300 gpm.

RESOLUTION: All three agencies agreed that the actions taken to date satisfied this requirement.

7. "Provide Ecology with copies of or easy access to as-built piping diagrams for all active and inactive 300 Area facilities."

STATUS: Action completed.

RESOLUTION: All three agencies agreed that the actions taken to date satisfied this requirement.

8. "Schedule monthly or bi-monthly meetings to discuss status of the effluent treatment facility."

STATUS: Regular meetings are held with the regulators to discuss the progress and issues associated with the 300 Area Treated Effluent Disposal Facility (Project L-045H).

RESOLUTION: All three agencies agreed that the actions taken to date satisfied this requirement.

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Enclosure 2

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Change Number M-17-93-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date April 15, 1993
Originator J. E. Rasmussen		Phone (509) 376-2247
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Interim Operating Restrictions for the 300 Area Process Sewer discharge to the 300 Area Process Trenches.		
Description/Justification of Change These proposed additional milestones address the terms and conditions under which the U.S. Department of Energy, Richland Operations Office (RL) can continue discharging to the 300 Area Process Trenches. These interim milestones specify the abandonment of the western-most trench, impose additional flow rate restrictions, specify completion dates for specific flow reduction projects, and specify dates for completion of design of the 300 Area Process Sewer Piping Upgrade. <p style="text-align: center;">(continued on next page)</p>		
Impact of Change These proposed interim milestones will specify more flow reductions and increased flow control in the 300 Area.		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan Table D-3 and Figure D-1		
Approvals <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved  <i>R. M. Sharp for SHW</i> DOE _____ Date <u>5/14/93</u> EPA _____ Date _____ Ecology _____ Date _____		

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Description/Justification of Change

Add the following interim milestones:

- M-17-06F Cease discharge of the 300 Area Process Sewer to the western-most of the 300 Area Process Trenches (i.e., west process trench) by December 1992.
- M-17-06G Limit discharges to the 300 Area Process Trench to less than or equal to 325 gallons per minute, averaged over the calendar month by May 1993.
- M-17-06H Complete installation of the 384 Power House Building cooling tower equipment by June 1993.
- M-17-06I Complete closed loop cooling equipment installation at the 325 Building (Project D-402), 306-W Building (Small Project ER 4039) and the 326 Building (Project D-403) by December 1993.
- M-17-06J Submit definitive design documentation for Project L-070, "300 Area Process Sewer Piping Upgrade" to EPA and Ecology by April 1995.

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