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Department of Energy

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Richland Operations Office
P.O. Box 550
Richland, Washington 99352

91-WOB-299

AUG 27 1991

Contractors, Richland, Washington

President
Kaiser Engineers Hanford Company

Director
Pacific Northwest Laboratory

President
Westinghouse Hanford Company

Gentlemen:



HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (AGREEMENT)

The Hanford Federal Facility Agreement and Consent Order (Agreement) currently requires cessation of liquid discharges to the 300 Area Process Trenches (Trenches) by December 1991 (TPA Milestone M-17-06). At the time the agreement was signed, the U.S. Department of Energy (DOE) indicated that a study was needed to confirm what actions could be taken associated with the Trenches. An additional milestone (M-17-05) was established to "select 300 Area Process Trench effluent treatment option and establish schedule for implementing treatment and ceasing liquid discharges" by March 1990. On the basis of the M-17-05 milestone study, it was concluded that the cessation of discharges to the Trenches by December 1991 was not readily achievable without adverse impacts to programs dealing with safety and the meeting of other Agreement milestones. On March 31, 1990 an implementation plan was submitted to the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) requesting deletion of the M-17-06 milestone and the addition of other milestones associated with waste minimization and volume reductions for the Trenches.

The proposed volume reductions will reduce flow to the Trenches from the 1990 flows of approximately 1300 gpm to a maximum of 400 gpm (average daily) by December 1991, 300 gpm (average daily) by December 1992, and 200 gpm (average daily) by May 1993. The residual effluent flow of 200 gpm will be routed to the treatment facility when it comes on-line in December 1994 (Milestone M-17-09). Although this change request was denied by the EPA and Ecology on April 8, 1991, firm commitments have been made during TPA negotiations by DOE to both agencies that these waste minimization and volume reductions will be met.

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Contractors

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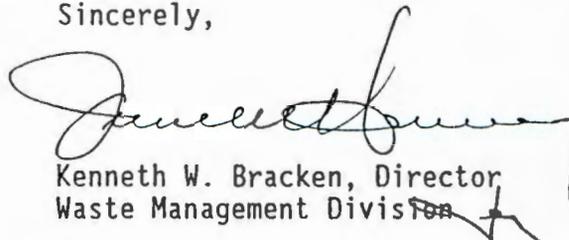
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The Westinghouse Hanford Company (WHC) and the Pacific Northwest Laboratories (PNL) are jointly requested to implement liquid effluent conservation measures throughout your operating facilities within the 300 Area. In support of these efforts, Kaiser Engineers Hanford (KEH) must provide adequate construction schedules, as requested, to ensure proper planning has been made. All contractors are further requested to plan and implement specific modifications within your operating facilities which discharge to the Trenches to meet the volume reduction commitments made to the EPA and Ecology. It is my understanding that waste minimization planning has been conducted which identifies by contractor and specific building the current flow rates, proposed reductions, and resources necessary to implement the reductions. You are requested to implement the waste minimization plans for achieving these reductions. The commitment for December 1991 is 400 gpm based on average daily flow. To meet this commitment, WHC and PNL have indicated in the waste minimization plan that they would have to implement additional flow reductions of 174 gpm and 161 gpm respectively.

It is the expectation of DOE that these commitments will be made. In addition, any difficulties in meeting these commitments will need to be reported promptly along with a recovery plan which may include alternative reductions to meet targeted volume reductions. A WHC-headed task force consisting of key representatives from each contractor is required to monitor progress toward achievement of the above goals and to report cost and schedule difficulties and resolutions to this office.

WHC is to contact Mr. Lance S. Mamiya of my staff at 376-1471, and provide the date for the first meeting within five working days of receipt of this letter. Monthly reports and status meetings will be required beginning in September 1991.

Sincerely,



Kenneth W. Bracken, Director
Waste Management Division

WMD:LSM

cc: R. J. Bliss, WHC
V. R. Dronen, WHC
W. M. Hamilton, WHC
J. R. Knight, WHC
R. E. Lerch, WHC
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