

START

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 11, 1995

Mr. James E. Rasmussen
Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-15
Richland, WA 99352-0550



Dear Mr. Rasmussen:

Re: State Waste Discharge Permit Number ST 4503 for the 183-N Backwash Discharge Pond

The *183-N Backwash Discharge Pond State Waste Discharge Permit Application* (DOE-RL-94-23) has been received and reviewed for completeness. The permit application is sufficiently complete for the Washington State Department of Ecology to begin preparing a draft permit. The public notice will be made in May 1995 (exact dates are not known at this time) in various Sunday newspapers.

Before the draft permit can be completed and a final permit issued, some additional information is needed. Please provide me with the information as soon as possible, to prevent any delay in the permitting process. Please provide the following data:

- No information was provided on the composition of the Coagulator Drains Wastewater (Contributor 1). This stream combines with the 183-N Backwash Sump discharge, down stream of the 183-N Backwash Sump sample point. The permit application states the 183-N Sludge Sump was not to be sampled until next year (1995). Provide analytical results for the coagulator drains wastewater discharging to the 183-N Sludge Sump.
- The Air Compressor Cooling Water (Contributor 3A) and the Fire Pump Cooling Water (Contributor 3B) make up about 1.3 M of the 2.0 M gallons discharged to the 183-N Discharge Pond. The permit application states these discharges will be eliminated in 1995. This will change the wastewater composition greatly. New analytical data or defensible

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calculations must be provided reflecting the composition of the flow to the 183-N Backwash Sump, or the 183-N Backwash Discharge Pond, after the two streams are discontinued.

- The permit application states wastewaters now discharging to 009 Outfall to the Columbia River will be rerouted to the 183-N Backwash Discharge Pond in 1996. The discharge rate is shown on Figure D-2 as 2.3 M gallons per month. No information regarding the composition of the 009 Outfall, or the combined stream, is provided in the permit application. This information is needed if the 009 Outfall wastewater is to be included in the permit.
- Based on analytical data in the permit application, the composition of the wastewater in the 108-N Neutralization Sump has a very low pH and is very high in Fe, Mn, Pb, Cr, and TDS. In order to reduce total contaminate load to a low which is reasonably achievable, methods should be investigated to reduce the metal concentration in this wastewater stream through treatment, or by reducing the amount of contamination at its source.
- The 183-N Backwash Sump wastewater exceeds the groundwater criteria slightly for Mn and by a factor of 10 for Fe. Determine if source control at the 108-N Neutralization Sump, where the Fe and Mn concentrations exceed groundwater criteria by a factor of over 100 and 25, respectively, will reduce the Fe and Mn concentrations to an acceptable level.

As the permitting process continues, I will notify you if additional data is needed. If you have any questions regarding this letter, please contact me at (509) 736-3011.

Sincerely,



Steven J. Skurla
Nuclear Waste Program

SS:skr

cc: Liz Bowers, USDOE
Randy Krekel, USDOE
Greg Sinton, USDOE
Doug Sherwood, EPA
Jeff Luke, WHC
Janice Williams, WHC

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Administrative Records: Liquid Effluents Consent Order ✓