

CHRISTINE O. GREGOIRE
Director



0002493

8903262

RECEIVED
R.E. LERCH

AUG 1 1989

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

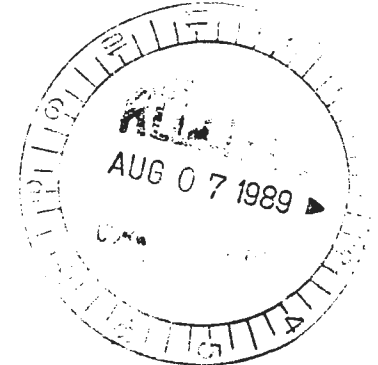
July 31, 1989

CLASS	_____
INDEXED	_____
FILED	_____
DATE	_____

START

Mr. R.D. Izatt, Director
Environmental Restoration Division
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, WA 99352

Mr. R.E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352



Dear Messrs. Izatt and Lerch:

Re: Comments on the SST Waste Characterization Plan

This letter transmits Ecology's comments on the May 31, 1989 draft of the Waste Characterization Plan for the Hanford Site Single-Shell Tanks. The plan was reviewed for compliance with waste designation and waste analysis requirements of the state dangerous waste regulations (chapter 173-303 WAC).

You will note that our comments have identified three key deficiencies in the waste characterization plan:

1. The waste characterization plan must provide for waste designation in compliance with all procedures required under the state Hazardous Waste Management Act (chapters 70.105 RCW and 173-303 WAC). As written, the plan omits or inadequately addresses many of these procedures. The waste characterization plan must be revised to incorporate hazardous waste designation in addition to the parameters now specified.
2. Holding time limits for the collection and analysis of hazardous constituents must not be exceeded. Limits proposed in the waste characterization plan are excessive. Increased holding times will be considered only after they have been shown not to increase sample degradation.
3. The waste characterization plan seems to contain conflicting descriptions regarding the extent of organic analyses to be performed on tank waste samples. In view of the recent concerns over hexone and other listed organic wastes in the 242 A process condensate, it is essential that the waste characterization plan provide for the analysis of all organic compounds which have been stored in the

Messrs. Izatt and Lerch
July 31, 1989
Page 2

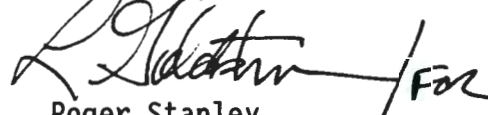
single-shell tanks in significant quantities. Proposed organic screening methods are not yet sufficient, on their own, to characterize the nature of the organic components in single-shell tank wastes.

These comments are mainly directed toward the analysis of waste from the first two tanks (Phase IA and IB). These two reference tanks should be subjected to full hazardous waste designation and comprehensive chemical, physical, and radiochemical analyses. Based on the results of this Phase IA and IB testing, Ecology and USDOE will be able to make informed decisions regarding the relative value of individual analytical procedures.

Ecology considers that the three deficiencies summarized above must be corrected before Phase IA analysis begins. Results of waste analyses performed under the proposed approach will be viewed as incomplete and resampling will be required.

We look forward to working with representatives of the USDOE, WHC, and PNL in resolving remaining SST waste sampling and analysis issues. Technical inquiries regarding this comment package may be directed to Mike Gordon of my staff at (206)438-7024.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Stanley" followed by a horizontal line and the word "For".

Roger Stanley
Hanford Project Manager

Enclosure

cc: Paul Day (USEPA)
Roger Freeberg (USDOE)

DISTRIBUTION COVERSHEET

Author R. F. Stanley, Ecology	Addressee R. D. Izatt, DOE-RL R. E. Lerch, WHC	INCOMING Correspondence No. 8903262
Subject Comments on the SST Waste Characterization Plan		

Internal Distribution

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		R. J. Baumhardt	R2-40	
		H. F. Daugherty	R2-53	
		A. J. DiLiberto	R2-12	
		C. J. Geier	H4-57	
		V. W. Hall	H4-17	
		K. L. Hoewing	B3-07	
		R. H. Koga	B3-06	
		R. E. Lerch (Assignee)	H4-51	X
		H. E. McGuire	H4-51	
		R. C. Nichols	B3-02	
		J. E. Nolan	B3-01	
		K. W. Owens	R1-19	
		L. L. Powers	H4-57	
		R. E. Raymond	R2-53	
		D. E. Simpson	B3-51	
		J. L. Waite	H4-52	
		S. A. Wiegman	H4-50	
		R. D. Wojasek	H4-51	
		EDMC	H4-51	X



90117490935