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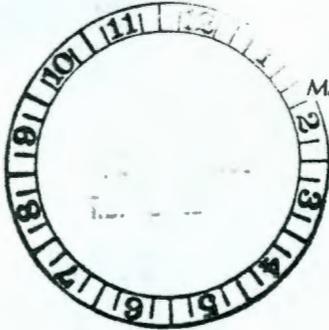
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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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



August 16, 1991



Mr. Ken Mosbaugh  
United States Environmental Protection Agency  
1200 6th Avenue  
Seattle, Washington 98101

Re: Project L-045H, Draft BAT Document

Dear Mr. Mosbaugh:

I have read the draft report for the BAT document for the 300 Area TEDF technology. My comments are as follows:

Page 23. We do not accept the "upper threshold for cost effectiveness" shown in the last sentence without considerably more study.

Page 102. The evaluation of Alternative 2 gives a precise amount for the cost of removal per toxic equivalent kilogram. No other alternate evaluation quotes a precise amount. This prevents accurate comparison.

Page 97. Alternate 4 is presented as the preferred alternative for treatment. We object to this for the following reasons:

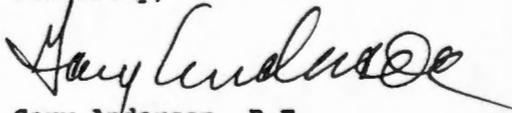
The economic analysis of the cost of treatment under Alternative 4 (page 87) shows a very low cost for secondary waste treatment compared to alternates with reverse osmosis units. Reverse osmosis units produce concentrated aqueous streams which are shown in the cost analyses to be treatable by costly grout techniques. On page 130, however, this report recommends spray drying as the preferred method of treating concentrated aqueous streams. We believe that the cost comparisons should use the costs for the recommended secondary waste treatment technology.

The treated effluent from Alternate 4 does not meet our standards for cyanide, silver or mercury. The cyanide is particularly troublesome since no attempt is made to treat cyanide at all. In our opinion, the neglect of any treatment at all does not constitute BAT. It is our belief that an ion exchange column or columns could remove cyanide and the mercury and silver as well.

Ken Mosbaugh  
August 16, 1991  
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If you have any questions, please call me at (206) 438-7558.

Sincerely,



Gary Anderson, P.E.  
Environmental Engineer  
Department of Ecology

GA:ga

cc: Dan Duncan, EPA  
Dave Nylander, Kennewick  
T. Veneziano, WHC  
Luis Soler, WHC  
Gary Mezger, Energy

