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**Department of Energy**

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352  
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94-ERB-127

Mr. Dave C. Nylander  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 1386, MSIN N1-05  
Richland, Washington 99352-0539

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352



Dear Messrs. Nylander and Sherwood:

**SAMPLING REQUIREMENTS FOR 200-BP-11/216-B-3 MAIN POND**

This letter responds to the State of Washington Department of Ecology's (Ecology) letter to S. H. Wisness from D. C. Nylander, "Sampling Requirements for 200-BP-11/216-B-3 Pond," dated December 20, 1993. The letter requested an analysis of the constituent list in Appendix IX of 40 Code of Federal Regulations 264 for the Resource Conservation and Recovery Act (RCRA) 200-BP-11/216-B-3 Pond treatment, storage, or disposal (TSD) unit. A Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change request #M-13-93-01 was signed on August 3, 1993, to integrate sampling and remediation activities related to RCRA TSDs and past practice waste management units within the 200-BP-11 RCRA past practice unit in the 200 East Area. The U.S. Department of Energy, Richland Operations Office (RL), the U.S. Environmental Protection Agency (EPA), Ecology, and the contractors began the Data Quality Objectives (DQO) process to determine how to accomplish this integration in an efficient and cost effective manner.

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RL and the Westinghouse Hanford Company (WHC) have compared Appendix IX with a list of potential contaminants used in facilities that had the potential to discharge to the 216-B-3 Main Pond. This list of potential contaminants of concern was developed from the B-Plant and PUREX Aggregate Area Management Study (AAMS) reports. The AAMS reports used process knowledge and historical information to develop a list of all chemicals used in the subject Aggregate Areas. It is reasonable to assume chemicals not on the AAMS report were not used in the facilities in the 200 East Area and could not be contaminants in 215-B-3 Main Pond. RL and WHC believe this chemicals-used list developed from the AAMS reports is appropriate to compare with the Appendix IX. Additional information gleaned from near surface sampling of Phases I, II, and III show no contaminants other than metals.

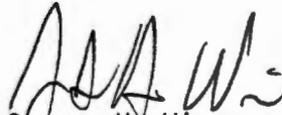
During the DQO process for the 200-BP-11/216-B-3 Pond, an analytes of concern list was developed for the 200-BP-11 Operable Unit (OU). This analytes of concern list includes all of the contaminants generated from the comparison of

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Appendix IX chemicals with the chemicals identified in the B-Plant and PUREX AAMS reports. Ecology had concerns about the accuracy of the AAMSs reports. An agreement was reached between RL, Ecology and WHC in the March 17, 1994, DQO meeting on sampling and analysis. The Appendix IX list using EPA SW-846 methods for analysis excluding methods 8280 (dioxins), 8150 (herbicides), 8140 (phosphorous pesticides), and 8015 (non-halogenated volatile organics) will be the Target Analyte list for the TSD within the 200-BP-11 OU. All tentatively identified compounds will be reported for volatile organic compounds and semi-volatile organic compounds.

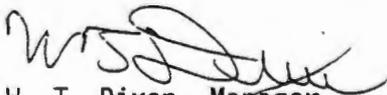
Should you have any questions, please contact Mr. R. G. McLeod, RL, at 372-0096 or Mr. F. A. Ruck III, WHC, at 376-9876.

Sincerely,



Steven H. Wisness, Acting Program Manager  
Office of Environmental Assurance,  
Permits, and Policy  
DOE Richland Operations Office

END:RGM



W. T. Dixon, Manager  
Regulatory Support  
Westinghouse Hanford Company

cc: W. Dixon, WHC  
D. Duncan, EPA  
S. Price, WHC  
F. Ruck, III, WHC  
J. Wallace, Ecology  
EDMC Records, H6-08