

# START

0026723



## Department of Energy

9301610

Richland Field Office

P.O. Box 550

Richland, Washington 99352

FEB 09 1993



93-LWB-027

Mr. Paul T. Day  
Hanford Project Manager  
U. S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Dear Mr. Day:

### LIQUID EFFLUENT SAMPLING AND ANALYSIS PLANS

In several letters to the U.S. Department of Energy, Richland Field Office, the U.S. Environmental Protection Agency provided comments to the revised liquid effluent Sampling and Analysis Plans (SAP). Those comments and responses are attached. In addition, revision 2 of the 2724-W Laundry Wastewater SAP is attached for your review and approval.

If you have any questions regarding this submittal, please contact Lance Mamiya of my staff on (509) 376-1471.

Sincerely,

*R.P. Cate*  
for June M. Hennig, Director  
Waste Management Division

WMD:LSM

### Attachments

cc w/att:

- D. R. Sherwood, EPA
- D. B. Jansen, Ecology
- G. Anderson, Ecology
- M. A. Selby, Ecology
- R. W. Oldham, WHC
- R. E. Lerch, WHC
- T. B. Veneziano, WHC
- B. A. Austin, WHC
- B. A. Davis, MACTEC



FEB 12 1993

93128680588

RESPONSES TO  
U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON  
REVISED LIQUID EFFLUENT SAMPLING AND ANALYSES PLANS

References:

- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, 222-S Laboratory Waste Water to 216-S-Crib Sampling and Analysis Plan, (WHC-SD-EV-075, Rev.1), dated January 7, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, 2101-M Waste Stream Sampling and Analysis Plan, (WHC-SD-PLN-014, Rev. 1), dated January 7, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, N-Reactor Effluent Sampling and Analysis Plan, (WHC-SD-NR-PLN-008, Rev. 1), dated January 6, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, Sampling and Analysis Plan for the 183-D Area Filter Backwash Facility Process Wastewater, (WHC-SD-PLN-035, Rev. 2), dated January 6, 1993.
- Letter, D. R. Sherwood, EPA, to S.H. Wisness, RL, 2724-W Laundry Wastewater Sampling and Analysis Plan, (WHC-SD-LL-PLN-001, Rev 0), dated January 6, 1993.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, PUREX CSL Sampling and Analysis Plan, (WHC-SD-PLN-013, Rev 1), dated December 29, 1992.
- Letter, D. R. Sherwood, EPA, to S. H. Wisness, RL, 400 Area Secondary Cooling Water Sampling and Analysis Plan, (WHC-SD-FF-PLN-002, Rev 2), dated December 29, 1992.

222-S Laboratory Waste Water to 216-S-26 Crib Sampling and Analysis Plan

COMMENT

"The U.S. Environmental Protection Agency (EPA) approves this plan for use, but we are somewhat concerned about the lack of description of Quality Control (QC) samples to be taken as part of this plan. Nearly all other plans approved to date provide a list of QC samples to be analyzed with each sampling event. Without QC samples, any hazardous substances found in the waste water will be attributed to the facility"

RESPONSE

The U.S. Department of Energy, Richland Field Office (RL) recognizes the EPA position on attributing any substances found in an effluent stream to the facility from which it came, unless it can be shown that the water influent to the facility contains that same substance in similar concentrations. To alleviate this potential problem, samples of the influent will be collected at least once and analyzed for those analytes noted in Section G.1 of the Sampling and Analysis Plan (SAP). In addition, quality control samples will be collected and analyzed in accordance with

25828  
25748  
25602  
25080  
25829  
25751  
25834  
25750  
25830  
19742  
25837  
25743  
25442  
24316  
3  
9

Section 10 of the Liquid Effluent Sampling Quality Assurance Program Plan, WHC-SD-WM-QAPP-011, latest edition.

#### 2101-M Waste Stream Sampling and Analysis Plan

##### COMMENT

"The EPA approves this plan for use. As noted in the plan, low flow conditions during the summer months may preclude sampling of this liquid effluent. If these conditions occur, and samples are not taken during the period of April through October EPA requires formal notification."

##### RESPONSE

Formal notification will be made as requested.

#### N Reactor Effluent Sampling and Analysis Plan

##### COMMENT

"The (EPA) has completed its review of the N Reactor Effluent Sampling and Analysis Plan. Of the plans reviewed to date, this plan is the only plan that suggests a potential delay in implementation due to the availability of a "qualified laboratory". The EPA does not accept identification of a "qualified laboratory" as a reason for any delay in implementation of this plan. Otherwise, EPA approves this plan for use. Please provide EPA and the Washington State Department of Ecology (Ecology) the basis for inclusion of this language in this plan. In addition, if samples are not taken within three months of approval, EPA requires formal justification for delays in implementation."

##### RESPONSE

RL and WHC have been working with the commercial laboratories currently under contract to provide the analysis protocols to support the National Pollutant Discharge Elimination System (NPDES) permit needs. The laboratories currently can provide analysis for the list of analytes but not to the mandated unmodified procedures needed to meet NPDES permit requirements as stipulated by the EPA. Current laboratory contracts are in the process of being extended and modification to these contracts cannot be done until April 1, 1993. The labs contracted have been asked to provide the unmodified methods for NPDES sample analysis in advance of the contract extension. However, the laboratories will most likely submit methods that contain modifications or decline to bid the unmodified methods altogether. If the contract laboratories bid the unmodified NPDES methods, review and assessment of the lab, specific to these needs, would be mandatory. Availability of contract laboratory support using unmodified methods remains questionable at best. A separate procurement specific to NPDES may be required. Until the above mentioned issues related to NPDES analysis can be resolved, a schedule for laboratory analysis of NPDES samples cannot be provided.

93128680590

**Sampling and Analysis Plan for the 183-D Filter Backwash Facility Process Wastewater**

**COMMENT**

"The (EPA) has completed its review of the Sampling and Analysis Plan for the 183-D Area Filter Backwash Facility Process Wastewater. This letter serves as approval of this plan.

The EPA and the Washington State Department of Ecology (Ecology) believe this plan should be implemented soon if the U.S. Department of Energy (DOE) plans to continue use of the 100-D ponds as the disposal site for the 183-D Area Filter Backwash Facility Process Wastewater after June 1995. Under Milestone M-17-10, the 100-D ponds are required to cease receipt of liquid discharges by June 1995, unless such units have been clean closed in accordance with Resource Conservation and Recovery Act. Data from the wastewater sampling and analysis program would help to support any request for continued discharge to the 100-D Ponds subsequent to clean closure.

Please advise EPA and Ecology of (y)our plans for discharge of the 183-D Area Filter Backwash Facility Process Wastewater after June 1995."

**RESPONSE**

RL has no plans to discharge this effluent after June 1995.

**2724-W Laundry Wastewater Sampling and Analysis Plan**

**COMMENT**

"The (EPA) has completed its review of the 2724-W Laundry Wastewater Sampling and Analysis Plan. It appears this plan was not revised in accordance with earlier comment review cycles. The EPA considers this plan to be deficient. The sampling objectives are incomplete. The analyte list is incomplete and inconsistent with the Quality Assurance Program Plan. No description of the routine sampling and analysis program is provided, yet it is clear from previous reports that Alpha, Beta, Strontium-90, gamma energy analysis, and Plutonium-239 were analyzed on a monthly basis. This plan requires major revision.

Please revise and resubmit this plan on or before January 31, 1993.

**RESPONSE**

The Plan has been revised and is attached for EPA approval.

93128680591

### PUREX CSL Sampling and Analysis Plan

#### COMMENT

"The (EPA) has completed its review of the PUREX CSL Sampling and Analysis Plan. This letter serves as formal approval of this plan.

In recent weeks, the U.S. Department of Energy has announced that the PUREX Plant will undergo a change in operational status from standby to shutdown. If this change in status is likely to influence the quality of the effluent discharge from the PUREX CSL, modifications to the plan may be necessary. As this transition proceeds, EPA and (Ecology) would like to be kept apprised of any significant changes in liquid effluent discharge practices."

#### RESPONSE

Effluent discharge practices will be monitored by PUREX Operations and any significant changes will be reported as requested. The Sampling and Analysis Plan will be revised and approved in accordance with the Tri-Party Agreement requirements as appropriate.

### 400 Area Secondary Cooling Water Sampling and Analysis Plan

#### COMMENT

"The (EPA) has completed its review of the 400 Area Secondary Cooling Water Sampling and Analysis Plan. This letter serves as formal approval of this plan.

As additional liquid effluent sampling and analysis plans are approved, EPA would like to meet with the U.S. Department of Energy and the Washington State Department of Ecology to discuss implementation of the sampling and analysis program."

#### RESPONSE

WHC had prepared a draft schedule for implementation. WHC is prepared to discuss this at the convenience of RL, EPA and Ecology.

93128680592

93128680593

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

JM Hennig, RL

PT Day, EPA

Incoming: 9301610

Subject: LIQUID EFFLUENT SAMPLING AND ANALYSIS PLANS

## INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-10	X
		President's Office	B3-01	
		B. A. Austin	B2-35	
		L. E. Borneman	B2-35	X
		S. K. Bradley	B3-06	
		D. E. Kelley	R3-45	X
		P. J. Mackey	B3-15	X
		H. E. McGuire, Level 1	B3-63	
		R. W. Oldham	H6-25	
		T. B. Veneziano, Assignee	L4-96	X
		EDMC	H6-08	X



93128680594