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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 20, 1994

Ms. Nancy Werdel  
Office of Environmental Assurance, Permits, and Policy  
U.S. Department of Energy  
P.O. Box 550 MSIN: A5-15  
Richland, WA 99352-0550



Dear Ms. Werdel:

Re: Description of Work for 100-D Ponds Sampling, Phase II, (BHI-00140, Rev. 0B),  
M-20-40

The Washington State Department of Ecology (Ecology) received the above referenced document on December 16, 1994. In addition, on December 19, 1994, Ecology representatives visited the Environmental Analytical Laboratory (EAL).

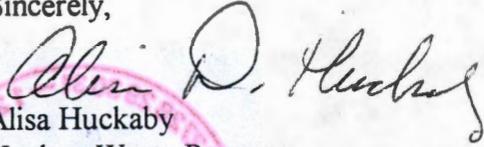
The above referenced document has been reviewed and will stand as is without comment. During the Data Quality Objectives (DQO) process, the document was repeatedly referred to as a Sampling and Analysis Plan (SAP). It should be noted that towards the end of the DQO, the sampling effort was agreed to represent only that of characterization. As such, Ecology accepts the decision by the U. S. Department of Energy and Bechtel Hanford, Inc. to develop and implement a description of work rather than a SAP. It should be noted that any data generated during the characterization effort cannot be utilized for Resource Conservation and Recovery Act (RCRA) closure certification purposes, as the description of work does not provide adequate detail to provide acceptable data.

During Ecology's visit of the EAL facility, it was determined that there was neither a quality assurance program, nor adequate validation procedures. Therefore, if the EAL facility is not operational, as defined by the Hanford Analytical Services Quality Assurance Plan (HASQAP) by the time samples are collected, then all samples are required, as agreed upon during the DQO process, to be sent off-site for analysis. In addition, as a reminder, it is imperative that sample holding times not be exceeded. Until the mentioned deficiencies are corrected, assurance of the accuracy of analytical data for RCRA closure certification purposes cannot be demonstrated. Therefore, again, the data generated from this characterization effort cannot be utilized for RCRA closure certification purposes. Lastly, due to the above identified concerns, Ecology will be collecting split samples during the characterization effort and the resulting data with the lowest practical quantification limits (PQL's) will be used.

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If you have any questions regarding the description of work, please contact me at 736-3034. If you have any questions regarding the analytical issues discussed above, please contact Jerry Yokel at (509) 736-3009.

Sincerely,



Alisa Huckaby  
Nuclear Waste Program

cc: Joan Bartz, GSSC  
William Cox, BHI  
Joan Woolard, BHI  
Administrative Record, 100 D Ponds

