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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

November 4, 1992

Mr. C. E. Findley, Director
Water Division
U. S. Environmental Protection Agency
1200 Sixth Avenue, Mail Stop WD-131
Seattle, WA 98101



Dear Mr. Findley:

Re: National Pollutant Discharge Elimination System (NPDES)
Permit Number WA-000374-3 modification application -
N-Reactor wastewater treated effluent: M-17-15

The Washington State Department of Ecology (Ecology) has completed its review of the *Application for Modification to NPDES Permit Number WA-000374-3, 100-N Wastewater Treatment System for 1325-N and N Reactor Wastewater Treatment System Engineering Report, WHC-SD-NR-ES-014,* provided by the Department of Energy (DOE). Ecology has the following comments for your consideration:

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- Drawing Number H-1-20570, provided as Attachment B to the application, references Drawing Number H-1-45007 for updated underground information. Ecology would like to review this drawing. We have requested a copy of this drawing from DOE.
- On page 2 of Form 2-D, the maximum total volume is incorrectly given as a flow rate rather than a flow volume.
- The engineering report recommends that additional sampling and analysis of the wastewater and treatability testing be performed prior to final design and construction. We agree with this recommendation.
- The existing outfall was constructed in 1960. The engineering report states that a significant portion of the flow comes from leaking pipes inside the plant. It seems probable that the outfall piping may also be leaking. We recommend that an assessment of the condition of the outfall piping be performed to determine if it is capable of

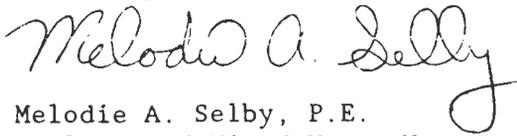
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functioning as designed. (Our primary concern is the stability of the bank.)

- On page 3 of Attachment F, the source of the 100 gpm and 60 gpm used to calculate the maximum daily values is not given.

If you have any questions about this letter, please call me at (509) 546-2967. Thank you.

Sincerely,



Melodie A. Selby, P.E.
Nuclear and Mixed Waste Management Program

MS:wlc
Enclosure

cc: Ron Izatt, DOE
Paul Day, EPA
Dave Jansen, Ecology
G. Thomas Tebb, Ecology
Administrative Record, M-17-15

