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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

JAN 31 1996

96-PCA-106

Mr. William Brandes, Chief  
Waste Identification Branch  
Office of Solid Waste  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, District of Columbia 20460



Dear Mr. Brandes:

DELAY IN REPORTING ANALYTICAL AND OPERATIONAL DATA, CONDITION 1A OF THE FEDERAL DELISTING (60 FR 31115)

As part of the conditions for delisting the effluent from the Hanford Site 200 Area Effluent Treatment Facility (ETF), the U.S. Environmental Protection Agency (EPA) required the U.S. Department of Energy, Richland Operations Office (RL) to implement a testing program following startup of the facility. The purpose of this letter is to inform you of delays in submitting data from this testing program.

Condition 1A of the final Delisting (60 Federal Register [FR] 31115) requires analysis of samples collected from each of the first three verification tanks and monitoring of operating parameters during the period required to fill these tanks. This condition also provides that RL "must report the operational and analytical data . . . obtained during the initial period no longer than 90 days after the first verification tank is filled with ETF effluents."

While preparing the proposed Delisting (60 FR 6054), EPA discussed these conditions with RL and Westinghouse Hanford Company personnel. This discussion included a review of information that would be used to establish the condition to report initial operating data within 90 days. It was agreed that a 90-day reporting period would be adequate for an initial operating period of approximately 10 days, based on the assumption that the ETF would operate at or near its design treatment capacity (150 gallons per minute) during the filling of the first three verification tanks.

The ETF began operating on November 12, 1995, and the first verification tank was filled on November 26, 1995. During the period required to fill the first tank, a number of equipment and system problems were encountered. These problems ultimately required a maintenance outage of the ETF on December 11, 1995, before the second tank was filled. This outage allowed for the repair and maintenance of the treatment system to enhance the operating efficiency of the ETF, but did not impact the treatment capability of the ETF.

On January 12, 1996, ETF operations resumed. However, because of the delays encountered in the initial operating period, the analytical and operational data will not be received in time to prepare and submit a meaningful report to EPA within the 90-day period (February 24, 1996).

Mr. William Brandes  
96-PCA-106

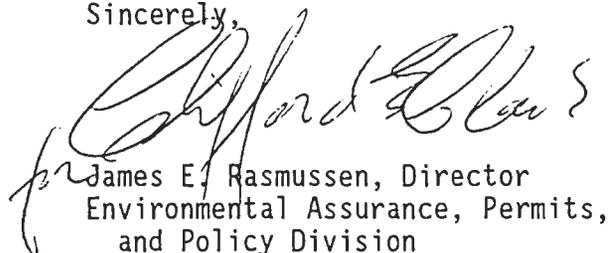
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In order to minimize the delays in meeting the 90-day reporting requirement and the milestone, RL is taking the following steps:

- Prepare a draft report based on available analytical and operational data from the first verification tank for RL review,
- Request rapid turnaround of analytical results from the laboratory, and
- Operate the ETF at highest, optimal flow rate.

By taking these steps, RL intends to minimize the delay on reporting the analytical and operational data. Assuming no outages in ETF operations (e.g., from system failures), a report should be ready for submittal to EPA by March 31, 1996. Should you have any questions, please contact me or Mr. Roger A. Quintero of RL on (509) 373-0421.

Sincerely,



James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division

EAP:RNK

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Subject: DELAY IN REPORTING ANALYTICAL AND OPERATIONAL DATA, CONDITION 1A OF  
THE FEDERAL DELISTING (60 FR 31115)

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