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Department of Energy

Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221
September 5, 2000



Mr. Clint Marshall
Ground Water Pollution Prevention Section
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502

SUBJECT: Discharge of Non-hazardous Brines under Discharge Plan DP-831

Dear Mr. Marshall:

The purpose of this letter is to confirm our discussion of August 25, 2000. During this discussion DOE informed the NMED of its intent to discharge non-hazardous brine collected from the surface ventilation ductwork of the exhaust shaft into the H-19 evaporation basin under WIPP's Discharge Plan DP-831.

This water consists of brine that seeps into the exhaust shaft and then follows one of two pathways. The brine either falls to the base of the exhaust shaft where it is collected in a catch basin or it becomes entrained in the exhaust shaft's air stream and collects in the exhaust fan ductwork.

The brine has been sampled and analyzed for total metals, and the analytical data demonstrate that the brines collected in the exhaust fan ductwork are consistently non-hazardous (Please see the attached data). Because these waters are non-hazardous brine, their discharge into the H-19 Evaporation Pond is allowed by WIPP's existing Discharge Plan. No change is required to the permitted volume of the H-19 Evaporation Pond.

In addition to the brine that collects in the exhaust shaft ductwork, WIPP intends to dispose of other non-hazardous brines that meet the Discharge Plan requirements. This includes the non-hazardous brine that falls into the catch basin at the bottom of the exhaust shaft. Since this brine has exceeded hazardous constituent limits in the past, it will be sampled each time it is removed from the catch basin to assure that it is non-hazardous. The volumes discharged to H-19 will be reported in the quarterly discharge monitoring report. The analytical data and the brine volumes generated will be maintained at the WIPP site.



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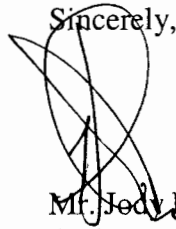


Mr. Clint Marshall

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If you have any questions regarding this request or require any additional information, please feel free to contact me at (505) 234-7462, or Cynthia Zvonar, CAO Environmental Compliance Manager at (505) 234-7495.

Sincerely,

A handwritten signature in black ink, appearing to read "Mr. Jody Plum", written over a horizontal line.

Mr. Jody Plum
Acting Assistant Manager
Office of Regulatory Compliance

Enclosures

cc: Steve Zappe, NMED

1998 EXHAUST DUCTWORK CONDENSATE/FLYWATER

Sample ID	Sample Date	Location	Analyte	Value	Units	Qualifier
WST98246	08/13/98	Ductwork Condensate	Arsenic	0.01	mg/L	U
WST98246	08/13/98	Ductwork Condensate	Barium	3.97	mg/L	B
WST98246	08/13/98	Ductwork Condensate	Cadmium	0.09	mg/L	B
WST98246	08/13/98	Ductwork Condensate	Chromium	2.20E-03	mg/L	U
WST98246	08/13/98	Ductwork Condensate	Lead	0.81	mg/L	B
WST98246	08/13/98	Ductwork Condensate	Mercury	2.00E-03	mg/L	UN
WST98246	08/13/98	Ductwork Condensate	Selenium	0.28	mg/L	B
WST98246	08/13/98	Ductwork Condensate	Silver	4.40E-03	mg/L	UN
WST98247	08/13/98	Ductwork Condensate	Arsenic	0.01	mg/L	U
WST98247	08/13/98	Ductwork Condensate	Barium	3.83	mg/L	B
WST98247	08/13/98	Ductwork Condensate	Cadmium	0.01	mg/L	U
WST98247	08/13/98	Ductwork Condensate	Chromium	2.20E-03	mg/L	U
WST98247	08/13/98	Ductwork Condensate	Lead	0.55	mg/L	B
WST98247	08/13/98	Ductwork Condensate	Mercury	2.00E-03	mg/L	UN
WST98247	08/13/98	Ductwork Condensate	Selenium	0.28	mg/L	B
WST98247	08/13/98	Ductwork Condensate	Silver	4.40E-03	mg/L	UN
WST98248	08/21/98	Ductwork Condensate	Arsenic	0.01	mg/L	U
WST98248	08/21/98	Ductwork Condensate	Barium	1.68	mg/L	BN
WST98248	08/21/98	Ductwork Condensate	Cadmium	0.04	mg/L	BN
WST98248	08/21/98	Ductwork Condensate	Chromium	2.20E-03	mg/L	UN
WST98248	08/21/98	Ductwork Condensate	Lead	0.63	mg/L	BN
WST98248	08/21/98	Ductwork Condensate	Mercury	2.00E-03	mg/L	U
WST98248	08/21/98	Ductwork Condensate	Selenium	0.23	mg/L	B
WST98248	08/21/98	Ductwork Condensate	Silver	0.03	mg/L	B
WST98249	08/21/98	Ductwork Condensate	Arsenic	0.01	mg/L	U
WST98249	08/21/98	Ductwork Condensate	Barium	1.61	mg/L	BN
WST98249	08/21/98	Ductwork Condensate	Cadmium	0.02	mg/L	UN
WST98249	08/21/98	Ductwork Condensate	Chromium	2.20E-03	mg/L	UN
WST98249	08/21/98	Ductwork Condensate	Lead	0.6	mg/L	BN
WST98249	08/21/98	Ductwork Condensate	Mercury	2.00E-03	mg/L	U
WST98249	08/21/98	Ductwork Condensate	Selenium	0.23	mg/L	B
WST98249	08/21/98	Ductwork Condensate	Silver	4.40E-03	mg/L	U

1999 EXHAUST DUCTWORK CONDENSATE/FLYWATER

Sample ID	Sample Date	Location	Analyte	Value	Units	Qualifier
WST99101	06/24/99	Ductwork Condensate	Arsenic	0.58	mg/L	
WST99101	06/24/99	Ductwork Condensate	Barium	1.00	mg/L	U
WST99101	06/24/99	Ductwork Condensate	Cadmium	0.01	mg/L	U
WST99101	06/24/99	Ductwork Condensate	Chromium	0.05	mg/L	U
WST99101	06/24/99	Ductwork Condensate	Lead	0.53	mg/L	
WST99101	06/24/99	Ductwork Condensate	Mercury	0.01	mg/L	U
WST99101	06/24/99	Ductwork Condensate	Selenium	0.05	mg/L	U
WST99101	06/24/99	Ductwork Condensate	Silver	0.05	mg/L	U

QUALIFIERS:

- B** - The reported value was obtained from a reading that was less than the Required Detection Limit (RDL) but greater than or equal to the actual Detection Limit (DL).
- U** - The analyte was not detected. The value reported is the DL corrected for any dilution in the sample preparation process and for the percent solids if the sample is a solid.
- N** - Spiked sample recovery is not within control limits.

1999 EXHAUST DUCTWORK CONDENSATE/FLYWATER

Volume Generated and Disposal Cost

DATE GENERATED	VOLUME GENERATED	# 55 GAL. DRUMS	DISPOSAL COST @ \$225/DRUM
01/07/99	55	1	\$225
03/01/99	55	1	\$225
03/22/99	55	1	\$225
03/29/99	55	1	\$225
04/14/99	110	2	\$450
05/03/99	165	3	\$675
05/18/99	55	1	\$225
05/24/99	220	4	\$900
06/03/99	220	4	\$900
06/10/99	55	1	\$225
06/21/99	220	4	\$900
06/22/99	275	5	\$1,125
06/23/99	440	8	\$1,800
07/07/99	165	3	\$675
07/08/99	55	1	\$225
07/19/99	110	2	\$450
07/29/99	110	2	\$450
08/10/99	110	2	\$450
08/16/99	55	1	\$225
08/30/99	165	3	\$675
09/09/99	165	3	\$675
09/13/99	110	2	\$450
09/21/99	110	2	\$450
10/06/99	55	1	\$225
10/19/99	55	1	\$225
11/08/99	55	1	\$225
11/15/99	110	2	\$450
12/08/99	55	1	\$225

1999 TOTAL VOLUME (gallons)	3,465		
1999 TOTAL 55-gal. DRUMS		63	
1999 DISPOSAL COST			\$14,175

1998 EXHAUST DUCTWORK CONDENSATE/FLYWATER

Volume Generated and Disposal Cost

DATE GENERATED	VOLUME GENERATED	# 55 GAL. DRUMS	DISPOSAL COST @ \$225/DRUM
1998	55	1	\$225
1998	55	1	\$225
07/07/98	110	2	\$450
07/31/98	110	2	\$450
08/18/98	110	2	\$450
08/21/98	110	2	\$450
08/26/98	110	2	\$450
08/28/98	55	1	\$225
09/01/98	110	2	\$450
1998	55	1	\$225
1998	55	1	\$225
1998	55	1	\$225

1998 TOTAL VOLUME (gallons)	990		
1998 TOTAL 55-gal. DRUMS		18	
1998 DISPOSAL COST			\$4,050