

RESPONSE TO COMMENTS

The public comment period for the draft NPDES permit for the U.S. Department of Energy 300 Area Treated Effluent Disposal Facility (TEDF) began on January 12, 1999 and expired on February 11, 1999. Comment letters were received from the Department of Energy, Richland Operations Office (RL) and from the Washington Department of Ecology (WDOE). These comments and EPA's response are summarized below.

1. Comment: RL stated that Bis(2-ethylhexyl)phthalate and Methylene Chloride are common laboratory contaminants present in laboratory blanks. RL requested that limitations for these substances be based on increases above any detected laboratory contamination.

Response: The technology-based effluent limitations for Bis(2-ethylhexyl)phthalate and Methylene Chloride proposed in the draft permit were increased from existing limitations to represent both the TEDF treatment efficiency and laboratory analytical capabilities that have been demonstrated since this facility became fully operational. The permittee is expected to use a reagent grade water for analytical purposes in which an interferant is not observed at the method detection level (MDL) of the parameter of interest. EPA has not defined the MDL in this permit for analytical methods. Rather, the permittee has been directed to use EPA approved analytical methods which will demonstrate compliance with limitations.

2. Comment: RL requested that the effluent limitations for chloroform, iron, nickel and zinc applicable to TEDF discharge after 'dangerous wastes' are received for treatment be consistent with those in table 1.A.

Response: Application information submitted by RL erroneously requested lower limitations for these parameters after 'dangerous wastes' are added to the TEDF influent waste stream. RL submitted a letter clarifying this error and EPA is changing the limitations for these parameters such that limitations in 1.A are consistent with 1.B.

3. Comment: RL identified some minor errors in the permit and fact sheet.

Response: EPA made corrections to section 1.G, 1.H and II.B of the permit and included the comments about the fact sheet in the administrative record.

4. Comment: Washington Department of Ecology provided 401 certification of the permit with the condition that the TEDF discharge be monitored for radionuclides.

Response: Analyses for radionuclides of TEDF discharges are already routinely conducted by the permittee. The requested monitoring and reporting requirements are included in the reissued permit.