

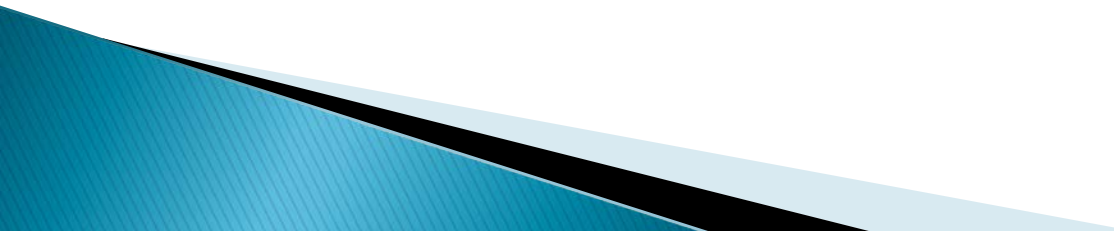
# Axial Variance Requirements

Agenda Item 21  
Technical Committee Mtg  
February 12–13, 2014

# Variance Requirements

- ▶ Beginning Oct 16, 2013:
  - Monthly mercury water quality monitoring upstream of Outfall 009 and at the downstream & lateral edge of the mixing zone. “Samples shall be representative of the entire water column.”
  - Annual fish tissue monitoring for total and methyl mercury. Two samples each from TL2,3 & 4.
  - Approval of sampling plans by ORSANCO.
  - Implementation of mercury reduction plan and submittal of annual progress reports.

# Axial Water Monitoring Plan

- ▶ Received water and fish sampling plan on Oct 30, 2013.
  - ▶ ORSANCO submitted comments on the water sampling plan on Nov. 7.
  - ▶ Held a conference call shortly thereafter to discuss ORSANCO's comments.
  - ▶ Received revised water sampling plan on Nov. 13.
  - ▶ Note: ORSANCO will submit comments, if any, this month on the fish sampling plan that will not begin until summer, 2014.
- 

# Water Sampling Plan Concern

- ❑ Initial plan indicated depth-integrated samples could not be collected above 50,000 cfs.
- ❑ There is a concern for missing a submerged discharge plume, and
- ❑ This flow is exceeded 1 / 3 of the year.
- ❑ ORSANCO and USGS collect depth-integrated samples under all flow conditions safe for being on water.
- ❑ Submitted comment on this and discussion revealed that their contractor is not equipped to collect depth samples under such flow conditions.
- ❑ Plan revised “samples collected to represent the entire water column to the extent feasible given river conditions.”

# Mercury Reduction Plans

- ▶ Have received 2012 & 2013 mercury reduction plans.
  
- ▶ 2012 Plan:
  - Evaluate new water well treatment system and ID areas for performance optimization ✓
  - Redefine internal sewer sampling protocol ✓
  - Investigate installation of dewatering station
    - Initial design begun ✓

# 2013 Mercury Reduction Plan

- ▶ Complete installation of dewatering station. X
  - Expected startup Feb, 2014.
- ▶ Review/evaluate 2012 treatment system operational data/ID & implement improvements. ✓
  - Mercury concentrations significantly reduced from internal process wastewater outfall 309.
- ▶ Investigate collection/treatment of non-captured stormwater from near 7 circuit bldg.
  - Some monitoring conducted. Decided to perform engineering evaluation of rain water collection and develop cost. Status unknown.

# 2013 Mercury Reduction (cont.)

- ▶ Continue mercury monitoring at internal locations, investigate high levels, and implement corrective actions.
  - Monitoring conducted. Specific investigation and implementation of corrective actions not discussed in report.
- ▶ Investigate new treatment technologies ✓
  - Working with Siemens Water Technologies

**Are Follow Up Actions  
Needed?**