

## TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 0762	TPA CHANGE NOTICE FORM	Date: 11/28/2016
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Document Number, Title, and Revision: DOE/RL-2014-42, 300-FF-5 Operable Unit Remedy Implementation Sampling and Analysis Plan, Rev. 0	Date Document Last Issued: September 2015
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Approved Change Notices Against this Document: N/A

Originator: Patrick A. Baynes	Phone: 509-372-3583
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**Description of Change:**

Section 3.5.1.2: The requirement for biennial reporting is being modified to state that inclusion of the 300-FF-5 Operable Unit in the annual site-wide groundwater monitoring report satisfies this requirement.

M.W. Cline DOE and B.W. Simes Lead Regulatory Agency agree that the proposed change modifies an approved work plan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement*.

The last paragraph of Section 3.5.1.2 is modified to add the following sentence: Inclusion of the sampling results in the annual site-wide groundwater monitoring report satisfies the requirement for biennial reporting in a publicly available document.

Additions are shown using double underline, deletions are shown using ~~strikeout~~.

Note: Include affected page number(s): 3-12

**Justification and Impacts of Change:**

The change identifies the annual site-wide groundwater monitoring report as an acceptable document for reporting the performance monitoring results for the 300-FF-5 Operable Unit.

**Approvals:**

DOE Project Manager	11/28/2016 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA Project Manager N/A	11/28/2016 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology Project Manager	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

The attainment monitoring phase occurs after the remediation monitoring phase is complete. Once the groundwater concentration for a COC is observed to have reached the CUL, data are collected and evaluated to confirm that attainment has been achieved. The attainment monitoring phase at a monitoring well is complete when the data support both of the following conclusions:

- The contaminant CUL for each COC has been met.
- Groundwater will continue to meet the contaminant CUL for each COC in the future (OSWER 9355.0-129).

### ***3.5.1.2 Evaluation of Performance Monitoring***

Evaluation methods that will be used to assess progress toward CUL attainment are summarized in Table A-2 (Appendix A) and discussed in detail in Appendix B. These evaluation methods are based on the general guidance and recommendations discussed in EPA 600/R-11/204 as part of a general framework for implementation of MNA.

The primary evaluation method for MNA and EA is statistical analysis. Statistical analysis is summarized in Table A-2 (Appendix A) as follows:

COC concentrations will be evaluated on a well-by-well basis based on statistical analyses of monitoring data. Fundamental tests will be applied to the remediation and attainment monitoring phases to evaluate performance and determine whether additional actions are required. The strategy for completing site closure is implemented in two phases: remediation monitoring phase and attainment monitoring phase. Attainment monitoring for each COC will commence on a well-by-well basis, as soon as concentrations of a COC have met the CUL at a well, as part of the analyses performed during the remediation monitoring phase.

Evaluations of remediation and attainment monitoring will be provided in 300-FF-5 OU project reports, as needed. Performance monitoring results for the 300-FF-5 OU will be reported biennially, at a minimum, in a publicly available document. Inclusion of the sampling results in the annual site-wide groundwater monitoring report satisfies the requirement for biennial reporting in a publicly available document. The performance monitoring reports will be prepared to support the sitewide five-year review schedule. These reports will be the vehicle by which the well-by-well evaluations for each COC are documented and, ultimately, will support documenting remedial action completion for the 300-FF-5 OU.

### ***3.5.1.3 Time Frames for Restoring Groundwater to Cleanup Levels***

The time frame in the 300 Area ROD/ROD Amendment (EPA and DOE, 2013) for restoring uranium to CULs using EA is between 22 and 28 years from 2012. As discussed in Section 1.2.5, the time to achieve the CUL for uranium in the groundwater will be re-evaluated following completion of the uranium sequestration application.

The time frame in the 300 Area ROD/ROD Amendment (EPA and DOE, 2013) for restoring tritium to CULs using MNA is 18 years from 2012. Time frames for restoring nitrate, TCE, and *cis*-1,2-DCE to CULs using MNA were not defined in the 300 Area ROD/ROD Amendment (EPA and DOE, 2013).

## **3.5.2 Sample Location, Frequency, and Constituents To Be Monitored**

The sampling requirements and groundwater monitoring wells comprising the 300-FF-5 OU network for each COC are summarized in this section and also described in more detail in Appendix A. Monitoring locations are shown in Figures 3-4, 3-5, 3-6, 3-7, 3-8, and 3-9. The AWLN is shown in Figure 3-3. Table 3-6 lists the specific constituents to be analyzed and the sampling frequency for the first 5 years for those wells that have been selected for monitoring. After the first 5 years, remediation monitoring will continue at the frequencies indicated in the notes section of Table 3-6. Sampling frequencies for each COC are summarized in Table 3-7.