

### TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 525	TPA CHANGE NOTICE FORM	Date: 6/4/2012
Document Number, Title, and Revision: DOE/RL-2009-124, 200 West Area Pump-and-Treat Facility Operations and Maintenance Plan, Revision 1.		Date Document Last Issued: August 2010
Originator: M. E. Byrnes		Phone: 373-3996

**Description of Change:**  
 Delete the requirement for visual inspection of pipelines and rely on flow meter monitoring to detect pipeline leaks. Set visual inspection frequency for wellheads at once per week. Treated groundwater to "no longer contain" F001 through F005 listed waste.

B. Charboneau and E. Laija agree that the proposed change  
**DOE** **Lead Regulatory Agency**  
 modifies an approved workplan/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*.

DOE/RL-2009-124, 200 West Area Pump-and-Treat Facility Operations and Maintenance Plan, Revision 1, section 3.6.1, page 3-4, and section 3.6.3, page 3-5, call for visual inspection of aboveground wellheads and above ground conveyance piping. This is changed to use only flow monitoring for detecting above ground conveyance pipeline leaks and to use weekly visual inspections for wellheads.

Deleted text is shown in ~~single line strike through~~, and added text is shown in **gray highlight** on the following page of this change notice.

Groundwater treated at the 200 West Pump and Treat will be regarded to "no longer contain" F001 through F005 listed dangerous waste.

**Note:** Include affected page number(s)

**Justification and Impacts of Change:**

The 200 West Area P&T was designed with all-welded, high-density polyethylene (HDPE) pipe as conveyance piping external to buildings and containments for extraction and injection water based on the 15-year interim 200-ZP-1 P&T system's operational record of no leaks in the conveyance pipelines. All-welded HDPE pipeline was used at the interim 200-ZP-1 P&T system based on positive experience from the use of all-welded HDPE pipe in the 100-HR-3 and 100-KR-4 P&T systems for 7 years without leaks (05-AMCP-0036, *Use of Single-Wall Piping for 200-ZP-1 Pump and Treat Expansion*). In total, there have been 22 years of pump and treat operations using high-density polyethylene (HDPE) pipe as conveyance piping without a leak.

Groundwater treated at the 200-ZP-1 pump and treat system consistently removed F001 (CC14) to less than detectable or less than the MTCA method B level of 3.4 ug/l and removed F002 through F005 constituents to less than detectable.

**Approvals:**

DOE Project Manager	<u>6/5/12</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA Project Manager	<u>6/4/12</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology Project Manager	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

DOE/RL-2009-124, 200 West Area Pump-and-Treat Facility Operations and Maintenance Plan, Revision 1, section 3.6.1, page 3-4, is changed as follows:

### **3.6.1 Extraction and Injection Well Inspection and Rehabilitation**

Extraction and injection wellhead piping and fittings will be visually inspected weekly to detect leaks. The inspection frequency will be the same as the above-ground conveyance piping. The inspection findings will be documented in a paper or electronic format that will be maintained in the work control system.

DOE/RL-2009-124, 200 West Area Pump-and-Treat Facility Operations and Maintenance Plan, Revision 1, section 3.6.3, page 3-5, is changed as follows:

### **3.6.3 Conveyance Piping Inspection**

A majority of the conveyance piping between the extraction wellheads and the treatment building will be above ground. Visual inspection of the piping will be conducted to confirm system integrity. The frequency of these inspections will be determined during construction. Inspections will be documented in an electronic or paper log to be maintained in the job control system. During operations, flow monitoring for early leak detection will be used. Flow-meter measurements will be taken between the well head and the transfer station and/or between the transfer station and the 200 West Area groundwater treatment facility. If a difference of +/- 5 percent occurs between flow at the facility and/or transfer building and at the well head, an alarm will be triggered, and the well pump and pipeline will automatically shut down, and the potential leak will be inspected.