

TRI-PARTY AGREEMENT

Change Notice Number TPA-CN- 524	TPA CHANGE NOTICE FORM	Date: 6/4/2012
Document Number, Title, and Revision: DOE/RL-2010-13, 200 West Area Groundwater Pump-and-Treat Remedial Design Report, Revision 1.		Date Document Last Issued: October 2010
Originator: M. E. Byrnes		Phone: 373-3996

Description of Change:
Delete the requirement for daily pipe walk downs and rely on flow meter monitoring to detect pipeline leaks. Set inspection frequency for wellheads to be once per week. Regard the 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-2010-13, 200 West Area Groundwater Pump-and-Treat Remedial Design Report, section 2.4.1.5, page 2-51, calls for a combination of daily walk downs and flow monitoring to provide leak detection for pipelines and wellheads. This is changed to use only flow monitoring for detecting pipeline leaks and to use weekly 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 has typically 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:

<u>Michael Clin for BIER via telecon</u>	<u>6/5/12</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
DOE Project Manager	Date	
<u>Emilio Diaz</u>	<u>6/14/12</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA Project Manager	Date	
_____	_____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology Project Manager	Date	

DOE/RL-2010-13, 200 West Area Groundwater Pump-and-Treat Remedial Design Report, Rev. 1, Section 2.4.1.5, page 2-51, Groundwater Conveyance Piping is changed as follows:

During operations, ~~a combination of daily pipe walkdowns and~~ flow-meter 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 significant variance in the measured flows between these points occurs,~~ 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 ~~the system~~ will automatically shut down and the potential leak will be inspected. ~~The measured difference representing this shutdown condition will be defined after steady state operations have commenced. In summary, daily pipe walkdowns will be initiated during normal operating periods, as required by WAC 173-303-640, "Tank Systems."~~ After the system has operated successfully through the shakedown period with no leaks, consideration could be given to reducing the frequency of the pipe walkdowns and relying more on automation/instrumentation for leak detection; however, this change would require written approval by RL and EPA.