



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

12-AMRP-0030

MAY 10 2012

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Dear Ms. Hedges:

**NOTIFICATION OF EXCEEDANCE OF CRITICAL MEAN VALUES FOR AN INDICATOR
PARAMETER AT LOW-LEVEL BURIAL GROUNDS, LOW-LEVEL WASTE
MANAGEMENT AREA 1**

The purpose of this letter is to provide notification that indicator parameter results exceeded critical mean comparison values for the treatment, storage, and/or disposal (TSD) unit regulated under requirements of the Dangerous Waste Regulations at WAC 173-303-400, which references 40 CFR 265 subpart F. The TSD unit is the Low-Level Burial Grounds, Low-Level Waste Management Area 1 (LLWMA 1).

The January 2012 sample results from downgradient well 299-E33-265 at LLWMA 1 exceeded the critical mean comparison value of 1,330 $\mu\text{g/L}$ for total organic carbon (TOC). The quadruplicate results averaged 2,663 $\mu\text{g/L}$. The well was re-sampled in April 2012 and results of split samples from two laboratories averaged 1,375 $\mu\text{g/L}$ and 1,468 $\mu\text{g/L}$, confirming the initial results.

The following actions are required as a consequence of these results:

“... the owner or operator must provide written notice to the Regional Administrator-within seven days ...that the facility may be affecting groundwater quality. [40 CFR 265.93(d)(1)]” (In this context, 'Regional Administrator' means State of Washington Department of Ecology) and,

“Within 15 days after the notification under paragraph (d)(1) of this section, the owner or operator must develop and submit to the Regional Administrator a specific plan... for a groundwater quality assessment program at the facility. [40 CFR 265.93(d)(2)]” (In this context, 'Regional Administrator' means State of Washington Department of Ecology). Note that although the U.S. Environmental Protection Agency has removed the requirement to submit the plan, the State of Washington Department of Ecology has retained the requirement through the Dangerous Waste Regulations.

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This letter fulfills the first requirement. The assessment plans are being written and will be submitted within fifteen days of this notification, fulfilling the second requirement.

If you have any questions, please contact me, or your staff may contact, Briant Charboneau, of my staff, on (509) 373-6137.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan A. Dowell" with "FOR" written to the right.

Jonathan A. Dowell, Assistant Manager
for the River and Plateau

AMRP:RDH

cc: F. W. Biebesheimer, CHPRC
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