



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

0049419

059774

JUN 24 1998

Mr. E. R. Skinnarland
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336-6018



Dear Mr. Skinnarland:

GROUNDWATER MONITORING PLAN FOR THE HANFORD SITE 216-B-3 POND
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY, PNNL-11903,
UC-502, JUNE 1998

The attached groundwater monitoring plan for the 216-B-3 Pond facility is revised to emulate RCRA final-status monitoring requirements, as described by WAC 173-303-645 and 40 CFR 264, Subpart F. Although this site is still in interim status, the proposed monitoring plans improve the ability to detect/confirm impacts to groundwater quality and at the same time achieve significant cost savings by reducing the number of routine groundwater samples required for statistical testing purposes. This site is scheduled to be regulated under final-status regulations as part of the RCRA Permit Mod F, but the schedule for including these facilities was delayed; this site is scheduled for final-status designation in the year 2000.

In a Data Quality Objectives meeting held on September 25, 1997, the State of Washington Department of Ecology (Ecology) staff requested that groundwater monitoring plans are prepared that use alternate, technically justified approaches (e.g., methods allowed under final-status), rather than strict adherence to interim-status requirements. This revised groundwater monitoring plan meets this purpose by utilizing sampling and statistical analysis approaches based on recommendations of the U.S. Environmental Protection Agency's 1989 "Interim Final Guidance on Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities," and the 1992 Addendum of the Interim Final Guidance. The revised plan, therefore, reflects the current thinking on detecting facility impacts to groundwater quality (presented in the statistical methods workshop of December 8 and 9, 1997).

For expediency, the groundwater monitoring provisions described in this plan will be implemented on July 1, 1998, unless the U.S. Department of Energy, Richland Operations Office, is advised otherwise by Ecology in the interim.

Mr. E. R. Skinnarland

-2-

JUN 24 1998

059774

If you want to discuss this matter further or require additional information, please contact me at 373-9630.

Sincerely,



M. J. Furman, Project Manager
Groundwater Project

GWP:MJF

Attachment

cc w/attach:
S. Leja, Ecology

cc w/o attach:
S. P. Luttrell, PNNL