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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

November 19, 2002

Mr. Joel B. Hebdon, Director  
United States Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, Washington 99352

Dear Mr. Hebdon:

Re: GROUNDWATER MONITORING AT THE 300 AREA PROCESS TRENCHES

- References:
- (1) Letter, Marvin Furman, United States Department of Energy (USDOE), from Dib Goswami, Washington State Department of Ecology (Ecology), dated May 7, 2001
  - (2) Letter, Michael A. Wilson, Ecology, from Joel Hebdon, USDOE, "Permit modification and request for temporary authorization for post-closure monitoring at the 300 Area Process Trenches", dated December 12, 2001, 02-RCA-086
  - (3) Letter, Joel B. Hebdon, USDOE, from Michael A. Wilson, Ecology, dated February 6, 2002
  - (4) Letter; Joel B. Hebdon, USDOE, from Michael A. Wilson, Ecology, dated May 10, 2002
  - (5) Resource Conservation and Recovery Act (RCRA) Final Status Compliance Monitoring Plan, WHC-SD-EN\_AP-185, Rev. 0A

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The Washington State Department of Ecology (Ecology) is providing this letter to clarify the permit requirements and compliance history of post-closure groundwater monitoring at the 300 Area Process Trenches. The regulated units are in post-closure care and have a post-closure groundwater monitoring plan, as required by Washington Administrative Code (WAC) 173-303-610(7). Pursuant to WAC 173-303-645(8)(h), the specific groundwater monitoring requirements are detailed in WHC-SD-EN-AP-185, Rev. 0A

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(Reference 5), which is incorporated by reference at Part VI, Chapter I of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

Ecology has received and reviewed the United States Department of Energy's (USDOE's) request for permit modification and temporary authorization for post-closure monitoring at the 300 Area Process Trenches (Reference 2). Ecology provided a response on February 6, 2002 (Reference 3), granting temporary authorization allowing USDOE's use of the revised Groundwater Monitoring Plan for the 300 Area Process Trenches (PNNL-13645) that included changes to the groundwater monitoring network, and introduced the Shewhart-CUSUM statistical approach (References 1 and 2). Ecology re-issued the temporary authorization effective June 10, 2002, to December 9, 2002 (Reference 4).

Ecology's letter dated May 7, 2001 (Reference 1), did not stipulate an initiation date for the monitoring plan PNNL-13645, though it was anticipated to be June 2001. Following subsequent discussions, Ecology has agreed that the effective start date was December 2001. However, since the temporary authorization expires on December 9, 2002, Ecology will employ its enforcement discretion to allow completion of the sampling campaign described in the 300 Area Process Trenches Groundwater Monitoring Plan on or before September 30, 2003. After September 30, 2003, USDOE is required to revert to the groundwater monitoring regime for the 300 Area Process Trenches as described in Part VI, Chapter I of the Hanford Facility RCRA Permit.

Ecology will use the data obtained from implementation of PNNL-13645 to evaluate whether the Shewhart-CUSUM statistical approach is appropriate for the distribution of chemical parameters pursuant to WAC 173-303-645(8)(i)(i).

Also note that Ecology is required to respond to public comment received on the 300 Area Process Trenches Groundwater Monitoring Plan (PNNL-13645) by December 9, 2002. In this response, Ecology will advise the following:

The public comments on PNNL-13645 require additional evaluation. Upon receipt and review of the analytical data packages derived from analysis of the groundwater sampling performed per the 300 Area Process Trenches Groundwater Monitoring Plan (PNNL-13645), Ecology will complete the evaluation and provide detailed technical responses. If a permit modification is proposed, the permit modification process will be conducted pursuant to WAC 173-303 requirements.

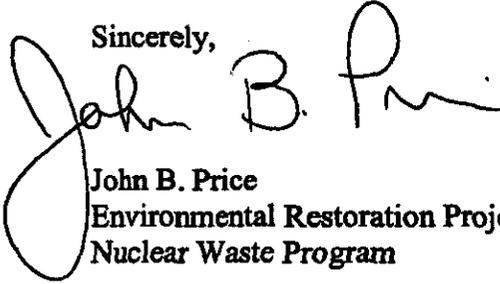
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to the groundwater monitoring regime for the 300 Area Process Trenches as described in Part VI, Chapter I of the Hanford Facility RCRA Permit.

Should you have any questions regarding this letter, please feel free to contact me at (509) 736-3029, or Bob Wilson at (509) 736-3031.

Sincerely,

A handwritten signature in black ink that reads "John B. Price". The signature is written in a cursive style with a large, looping initial "J".

John B. Price  
Environmental Restoration Project Manager  
Nuclear Waste Program

JV:sb

cc: Marvin Furman, USDOE  
Ellen Mattlin, USDOE  
Jonathan Lindberg, PNNL  
Ken Niles, OOE  
Administrative Record: 300 Area Process Trenches