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| Change Number M-24-00-01 | Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink. | Date March 3, 2000 |
| Originator Jane Hedges, Ecology | | Phone (509) 736-3016 |
| Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager | | |
| Change Title ESTABLISH CALENDAR YEAR 2000 INTERIM MILESTONE M-24-00L FOR RCRA WELL INSTALLATION | | |
| Description/Justification of Change Introduction: Regulatory standards for the generation, transportation, storage, treatment, and disposal of dangerous wastes are established in <i>Resource Conservation and Recovery Act of 1976 (RCRA)</i> and relate to ongoing waste-management and permitting at active facilities. The Hanford Facility RCRA Permit was issued by the Washington State Department of Ecology (Ecology) and the United States Environmental Protection Agency (EPA) in August 1994. Ecology and EPA designated the Hanford Site as a single RCRA facility with over 60 individual liquid and solid waste treatment, storage and disposal (TSD) units. The Tri-Party Agreement recognized that all of the TSD units cannot be permitted simultaneously and set up a schedule for submitting unit-specific Part B RCRA/dangerous waste permit applications and closure plans to Ecology and EPA. | | |
| Impact of Change The identification and securing of funding for well construction, and administrative action incorporating this change into Appendix D. | | |
| Affected Documents The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended, and Hanford site internal planning, management and budget documents (e.g., Agreement Action Plan Appendix D, DOE and DOE contractor Baseline Change Control documents; Multi Year Work Plans; Sitewide Systems Engineering Control Documents; Project Management Plans; and the Hanford site Integrated Priority List (IPL)). | | |
| Approvals _____ <u>W. Wade Ballard</u> _____ <u>3/10/00</u> _____ Approved <input checked="" type="checkbox"/> Disapproved DOE Date _____ <u>N/A</u> _____ Approved _____ Disapproved EPA Date _____ <u>Mike Wilson</u> _____ <u>3/3/00</u> _____ X Approved _____ Disapproved Ecology Date | | Page 1 of 3 |

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RECORD NOTE:

ERRORS OF FACT:

Ecology's cover letter states, in the second paragraph, that "...there was no debate regarding the justification for monitoring well construction, only the assertion by USDOE that funding was unavailable." In fact, there was considerable debate concerning the usefulness of installing the large number of wells, especially far-field, all in one year. The issue was one of timing, and DOE asserted that it would be more efficient, from a technical standpoint, to put in some of the wells this year, evaluate the data and then optimize future year well locations based on results from this year. There was not a consensus reached on the timing of well installation. Ecology's final well requirements did not include a technical justification. Ecology during the last negotiation meeting indicated that they had identified "data gaps", but did not provide any elaboration or detail to identify them or to provide a basis for priority or sequence of well installation.

Ecology's cover letter also states that, "These meetings also resulted in agreement among the parties that characterization during construction of these monitoring wells would provide critical information on both vadose zone and aquifer properties and on the distribution of contamination." Though it was generally agreed during the meetings that additional characterization is needed, there was no agreement on the extent of characterization necessary. Indeed, it was made clear to Ecology that many of these characterization needs, especially those for the SST WMAs, would have to be defined with input by other projects responsible for the data needed. Ecology did not identify their own characterization requirements.

ISSUES:

In the change control form, the third paragraph states, "Due to the risk to human health and the environment posed by releases from the 200 West Tank Farms...". Ecology has not presented any information or argument for how the installation of sixteen SST wells in this calendar year, versus an incremental installation schedule, would enhance risk mitigation.

The primary risk addressed in the Ecology letter is based on radionuclide release. Yet, source, special nuclear, or by-product materials as defined by the Atomic Energy Act that are components of a mixed waste are specifically excluded from regulation under RCRA. The authority that empowers Ecology to require the installation of these wells is for RCRA compliance.

Actual risk mitigation measures now underway and planned include corrective actions and interim stabilization. Corrective actions have decommissioned borehole 41-09-39, and conducted an engineering study on limiting infiltration in tank farms. The new well at SX-115 and the planned slant borehole at SX-108 will characterize contamination in the soil column beneath the tank farms, and geophysical monitoring will further characterize the subsurface contamination. Interim stabilization will be removing pumpable supernatant and interstitial liquid from a total of 29 SSTs to DSTs over the next four years. An accelerated RCRA-compliant groundwater monitoring well installation schedule could detract resources from this effort.

The funding scenario for well installation has undergone considerable evolution. Initially, there was no funding identified for RCRA-compliant well installation for calendar year 2000. Just before negotiations with Ecology were scheduled to start \$2,600,000 was tentatively identified. The initial and counter DOE proposals were based on a data-quality-objectives exercise and this funding scenario. Presently, the funding is identified at \$1,050,000, with \$600,000 provided through ORP and \$450,000 through RL. The present funding scenario is projected to pay for the installation of three ORP wells and three RL wells. The Ecology change control requires the installation of sixteen wells for the single-shell tanks and three wells for RL facilities.