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9401990

Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAR 31 1994

94-LWB-025



Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Roger F. Stanley, Director
Tri-party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Stanley:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL,
M-24-94-01, ESTABLISH CALENDAR YEAR 1994 INTERIM MILESTONES FOR RESOURCE
CONSERVATION AND RECOVERY ACT WELL INSTALLATIONS

This letter transmits, for approval, a proposal of Interim Milestones in support of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-24-00F. The enclosed change request, M-24-94-01, is a Class II change and requires approval by the Tri-Party Agreement Project Managers. The objective is that this change be approval at the Project Managers meeting scheduled for April 14, 1994.

Should you have any questions, please contact either Mr. Marvin J. Furman on (509) 376-7062, or me on (509) 376-6798.

Sincerely,

Steven H. Wisness
Steven H. Wisness
Hanford Project

LWB:MJF

Enclosures

cc w/encl:
B. A. Austin, WHC
D. J. Jansen, Ecology
D. C. Nylander, Ecology
K. R. Fecht, WHC
R. R. Thompson, WHC



Change Number M-24-94-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date March 18, 1994																
Originator R. R. Thompson		Phone 376-6914																
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager																		
Change Title ESTABLISH CALENDAR YEAR 1994 INTERIM MILESTONES FOR RCRA WELL INSTALLATION																		
Description/Justification of Change The following RCRA well location is in support of Milestone M-24-00, "Install RCRA groundwater monitoring wells at the rate of ... up to 50 per year..." after 1991 "as specified by agreed interim milestones..." This location is based on permitting and RCRA detection and monitoring requirements. The second milestone is devised to allow contingency for groundwater well requirements determined within a reasonable time for completion of installation with the calendar year.																		
<table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px solid black;">Milestone #</th> <th style="text-align: left; border-bottom: 1px solid black;">Milestone Description</th> <th style="text-align: left; border-bottom: 1px solid black;">Due Date</th> </tr> </thead> <tbody> <tr> <td>M-24-33</td> <td>Install 1 additional RCRA well by the U-12 Crib (5 total)</td> <td>DEC 1994</td> </tr> <tr> <td>M-24-34</td> <td>Ecology may establish up to 2 additional RCRA wells for CY 1994 with locations To Be Determined. (TBD)</td> <td>MAR 1994</td> </tr> </tbody> </table>			Milestone #	Milestone Description	Due Date	M-24-33	Install 1 additional RCRA well by the U-12 Crib (5 total)	DEC 1994	M-24-34	Ecology may establish up to 2 additional RCRA wells for CY 1994 with locations To Be Determined. (TBD)	MAR 1994							
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Impact of Change Administrative action required to incorporate this change into Table D-3 and the Work Schedule.																		
Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan - Appendix D, Work Schedule and Table D-3.																		
Approvals <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%; border-bottom: 1px solid black;"></td> <td style="width:15%; border-bottom: 1px solid black;">3/31/94</td> <td style="width:15%; border-bottom: 1px solid black;"><input checked="" type="checkbox"/> Approved</td> <td style="width:15%; border-bottom: 1px solid black;"><input type="checkbox"/> Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">DOE</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Approved</td> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Approved</td> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Ecology</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Approved</td> <td style="border-bottom: 1px solid black;"><input type="checkbox"/> Disapproved</td> </tr> </table>			3/31/94	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	DOE	Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	EPA	Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	Ecology	Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	<p style="font-size: 1.2em; font-weight: bold;">PLEASE SIGN & DATE</p> <p style="font-size: 1.2em; font-weight: bold;">PLEASE SIGN & DATE</p>
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PROPOSED TRI-PARTY AGREEMENT MILESTONE M-24-33, CURRENT YEAR 1994
New Groundwater Monitoring Well
Justification for the 216-U-12 Crib

The 216-U-12 Crib has been in assessment groundwater monitoring for hazardous contaminants under RCRA assessment monitoring requirements, 40 CFR 265.93 (d), since the first quarter of CY 93. As summarized in the RCRA Annual Report, DOE/RL-93-88, Section 4.3, groundwater contamination detected in two downgradient wells is being assessed to determine the contributing chemical constituents and source. This phase of assessment is outlined in the Interim Status Groundwater Quality Assessment Plan for the 216-U-12 Crib, WHC-SD-EN-AP-108, rev. 0, released January 28, 1993.

The second phase of the assessment will deal with the delineation and location of the contaminant plume(s) and includes the drilling of additional boreholes for groundwater monitoring. Based on data collected to date it can be shown that the contamination is a result of high concentrations of nitrates and associated radioisotopes (Tech-99) released to the groundwater from disposal practices at the 216-U-12 Crib. This interpretation and the supporting evaluation will be released in the forthcoming groundwater assessment report due to Ecology on July 1, 1994. The recommendation of this evaluation is to move into phase II and proceed with delineating and defining the plume(s) through the drilling of investigative boreholes.

Limited subsurface data in the area downgradient of the U-12 Crib requires additional drilling to define the extent of the plume (see location map). One groundwater monitoring well is proposed to begin this investigation. The discovery process will determine the need and location of additional boreholes if required.

This borehole will be located based on strategies and modeling developed both in RCRA and from the 200-UP-2 Operable Unit Project (CERCLA) which is providing regional plume mapping and remedial investigations of the U-Plant waste disposal activities in the area. Another beneficiary of this well will be the Double Shell Tank project which is being constructed in this general area downgradient of the contaminants sourced by the U-12 Crib (and presumably the U-8 Crib). This well will be the only groundwater monitoring well available and capable of determining the nature and extent of contaminants in the groundwater upgradient from and near to the new tank farm.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: S. H. Wisness, 376-6798
Addressee: D. R. Sherwood, EPA
R. F. Stanley, Ecology
Correspondence No.: Incoming: 9401990

Subject: HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL,
M-24-94-01, ESTABLISH CALENDAR YEAR 1994 INTERIM MILESTONES FOR
RESOURCE CONSERVATION AND RECOVERY ACT WELL INSTALLATIONS

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		L. D. Arnold	B2-35	
		B. A. Austin	B2-35	X
		P. J. Mackey	B3-06	X
		H. E. McGuire, Level I	B3-63	
		S. R. Moreno	B3-06	
		R. D. Morrison	B2-35	X
		R. R. Thompson	H6-32	X
		T. B. Veneziano, Assignee	H6-32	X
		J. L. Waite	B2-35	X
		EPIC	H6-08	X

