



Department of Energy

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

9207471

OCT 23 1992

93-TPA-008

Mr. Paul T. Day
Hanford Project Manager
U. S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. David B. Jansen, P.E.
Hanford Project Manager
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 99504-8711

Dear Messrs. Day and Jansen:

APPROVAL OF CHANGE REQUEST M-24-91-6

A copy of Change Request M-24-91-6, signed by Mr. John Wagoner, is attached for your approval. Milestone M-24-00 requires the U.S. Department of Energy, Richland Field Office (RL) to install Resource Conservation and Recovery Act (RCRA) compliant groundwater monitoring wells at the rate of 50 per year at the Hanford site to establish a monitoring system compliant with the requirements of the RCRA. Approximately 250 RCRA compliant wells have been installed since 1986 and the system is nearing compliance. RL and its contractor staff reached technical agreement with the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) to reword this milestone to reflect the relatively small number of wells now needed each year to reach and maintain compliance. In accordance with that agreement, a Class I Change Request (M-24-91-6) was prepared and submitted for public review and comment. After the comment period ended, the RL, Ecology, and EPA reviewed all comments and prepared responses to them. None of the comments required modification of the Change Request. All comments and responses are attached.



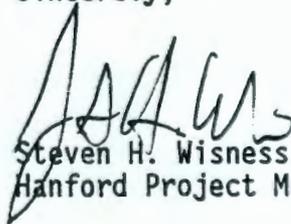
Messrs. Day and Jansen
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The original Hanford Federal Facility Agreement and Consent Order Change Request M-24-91-6 is forwarded by this letter to Ecology for signature and subsequent transmittal to the EPA for signature. Note that since this is a Class I change request it requires the signature of the Ecology Director and EPA Region 10 Administrator. I propose that 14 days be allowed for disposition by EPA and Ecology rather than 7 days as required by Article XL of the Tri-Party Agreement. Please return the completed original change form for the Administrative Record.

Sincerely,



Steven H. Wisness
Hanford Project Manager

EAP:KMT

Attachments:

1. M-24-91-6 Change Request
2. Public comments and responses

cc w/attach: B. A. Austin, WHC/



Change Number M-24-91-6	FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM Do not use blue ink. Type or print using black ink.	Date Feb. 12, 1992
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Originator R. R. Thompson	Phone 6-9988
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Class of Change <input checked="" type="checkbox"/> I - Signatories (Section 13.0) <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager

Change Title Change Total Number of RCRA Wells to be Installed in Calendar Year 1992

<p>Description/Justification of Change</p> <p>Existing Milestone M-24-00 reads as follows: M-24-00 Install RCRA groundwater monitoring wells at the rate of 29 in Annually CY 1989, 30 in CY 1990, and 50 per year thereafter until all land Beginning disposal units and single-shell tanks are determined to have RCRA CY 1989 compliant monitoring systems.</p> <p>USDOE will install groundwater monitoring wells around RCRA land disposal units and the single-shell tanks at the rate described above until Ecology determines that all such groundwater monitoring systems meet the requirements of WAC 173-303-645.</p> <p>Installation of groundwater wells shall mean that wells have been drilled, adequately sealed, and screened over no more than 15 feet of the aquifer unless otherwise approved by Ecology, that all pumps and associated sampling equipment have been installed, and that such wells have been developed sufficiently to provide satisfactory samples for all parameters to be analyzed.</p> <p>Specific units to receive groundwater wells and the number of wells to be installed at each unit will be identified in Appendix D in two-year intervals (i.e., CY 1989 and CY 1990, now CY 1990 and CY 1991 at the next annual update, etc.). Such milestones will be enforceable as interim milestones.</p> <p>(Continued on following page)</p>
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Impact of Change None.

Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Work Schedule and Table D-3.
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<p>Approvals <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved</p> <p><i>John D. Wagoner</i> <u>3/5/92</u> <small>DOE</small> Date</p> <p>_____ EPA Date</p> <p>_____ Ecology Date</p>	
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Change the first and second paragraphs only of the milestone to read as follows:

M-24-00	Install RCRA groundwater monitoring wells at the rate of 29 in CY 1989, 30 in CY 1990, and up to 50 per year thereafter as specified by agreed interim milestones until all land disposal units and single-shell tanks are determined to have RCRA compliant monitoring systems.	Annually Beginning CY 1989
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USDOE will install groundwater monitoring wells around RCRA land disposal units and the single-shell tanks at the rate described above until Ecology agrees that all such groundwater monitoring systems meet the requirements of WAC 173-303-645.

This change concerns setting the well installation rate at 30 in CY 1992 and requires the state to propose locations for four wells beyond those proposed in earlier change requests if these four wells are to be finished in CY 1992.

Add the following interim milestone:

M-24-29	Ecology may identify locations for 4 additional RCRA wells to be installed by December 1992 or within nine months of the date the locations are identified.	Mar. 1992
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The locations for 26 wells to be drilled in CY 1992 have been identified in M-24-19 through M-24-28 and there is technical agreement to these locations. Ecology may identify as many as four more wells. Technical discussions of well locations are in progress. The RCRA monitoring wells installed at the specified land disposal units and single-shell tanks are approaching the numbers specified in the groundwater monitoring plans. The changed rate of installation of wells will allow time for technical interpretation of additional analytical data from wells already installed and establish a sound technical basis for the location of additional wells. This is not intended to exclude an early start of drilling for the CY 1993 wells; neither will it change plans for CY 1993 as specified in Milestone M-24-00.

Attachment 2

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONE-24: RCRA GROUNDWATER MONITORING WELLS
SUMMARY OF PUBLIC COMMENTS

September 30, 1992

The State of Washington Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Richland Field Office conducted a 45-day public comment period to obtain public comments about draft changes to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). Specifically, the agencies asked the public to comment on proposed changes to Milestone-24, installing Resource Conservation and Recovery (RCRA) standard groundwater monitoring wells on the Hanford Site.

The public comment period began April 20, 1992 and ended June 3, 1992. Three individuals and organizations provided written comments about the proposed changes.

You can review the written comments at the Hanford Public Information Repositories:

U.S. Department of Energy, Richland Field Office,
Public Reading Room
Federal Building Room 157
825 Jadwin Avenue
Richland, WA
(509) 376-8583

Suzzalo Library,
University of Washington
Seattle, WA
(206) 543-4664

Crosby Library
Gonzaga University
E. 502 Boone, Spokane
(509) 328-4220

Portland State University Library
Corner of Harrison and Park
Portland, OR
(503) 464-4617

To receive a copy of the written comments, contact Mary Getchell, State of Washington Department of Ecology, P.O. Box 47600, Olympia, Washington 98504-7600, 1-800-321-2008.

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONE 24: RCRA GROUNDWATER MONITORING WELLS
SUMMARY OF COMMENTS AND RESPONSES
September 30, 1992

RESPONDENT: DOE

Comment: Understanding of proposed change is to pare back the number of wells from 50 per year to 30 per year. What will happen to the money that was supposed to be used for drilling the wells, if the wells will not be drilled? Will the money be set aside for groundwater monitoring in the future?

Response: The change is to specifically reduce the number of Resource Conservation and Recovery Act (RCRA) wells in Calendar Year 1992 from 50 to a possible 30 wells. For future years the milestone reads "up to 50" groundwater monitoring wells. Money not spent for the RCRA well drilling portion of the Hanford Environmental Compliance project will be redistributed to other sub-projects, many of which are Hanford Tri-Party Agreement related or directly related to other milestones. Beginning with next fiscal year, RCRA groundwater well installation will be funded under a new line item project. Groundwater monitoring activities, including sampling and analysis, are funded on a continuing basis.

RESPONDENT: ECOLOGY

Comment: The 50 groundwater wells should be put in to meet the requirements of RCRA. It is a safety precaution.

Response: The installation of 50 RCRA groundwater monitoring wells per year originally required in the Agreement, was designed to bring the Hanford site into compliance with the RCRA groundwater regulations. The DOE has established a monitoring network which meets the minimum requirements. It is possible, however, that based on analysis of groundwater information, the regulatory agencies will require the placement of additional monitoring wells. Until the agencies receive and evaluate monitoring information, it is not efficient to place additional wells. In short, without review of information from the existing network, it would be a waste of resources (time and money) to place 50 wells every year. Instead, the agencies need the flexibility to require the appropriate number of wells in the proper locations on an annual basis. This change give all of the agencies that flexibility.

With respect to safety precaution, the agencies agree that RCRA groundwater monitoring is such a precaution, however, groundwater monitoring wells will only effectively serve that purpose if they are placed in the proper locations. We can only do this after further collection and evaluation of data.

RESPONDENT: ECOLOGY

Comment: It sounds like there are already enough wells. Why are the agencies proposing to change the language to allow for "up to 50 wells per year" for the future?

Response: At the current time, the agencies have determined that there are sufficient wells to meet the minimum requirements. After evaluation or

monitoring data from the newly installed monitoring network it may be necessary to install additional groundwater monitoring wells. The wording of the milestone to allow "up to 50 wells per year" provides Ecology, EPA and DOE the flexibility to locate additional wells on an informed basis, typically much less than 50 wells per year while providing the ability to respond to what is learned by monitoring.

RESPONDENT: ECOLOGY

Comment: Drilling can cause contaminants to migrate--concerned about drilling more wells.

Response: The DOE and its contractors and the regulatory agencies share the concern about the potential spread of contamination. The RCRA wells are designed and drilled taking available precautions to prevent the potential migration of contaminants encountered. When possible, the wells are intentionally located to avoid drilling through contaminated soils and groundwater and yet still provide effective monitoring of the site. Well construction practices are designed so that the wells drilled will not serve as a pathway for the spread of contaminants. Concern about causing the migration of contaminants is a major part of the well installation design and planning.

The regulatory agencies are extremely concerned with this issue. For this reason they conduct detailed oversight of the drilling activities to identify any potential contaminant migration. The agencies believe that the information gained through a planned groundwater monitoring program far outweighs the small risk associated with drilling wells.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

S. H. Wisness, RL

P. T. Day, EPA
D. B. Jansen, Ecology

Incoming: 9207471

Subject: APPROVAL OF CHANGE REQUEST M-24-91-6

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		President's Office		
		B. A. Austin	B2-35	X
		S. L. Bradley	B3-06	
		K. R. Fecht	H4-56	X
		G. D. Forehand	B2-35	X
		P. M. Harrington	H5-25	X
		R. L. Jackson	H4-56	X
		P. J. Mackey	B3-15	X
		H. E. McGuire, Level 1	B3-63	X
		R. D. Morrison	B2-35	X
		R. R. Thompson	L4-88	X
		T. B. Veneziano	B3-63	X
		R. D. Wojtasek, Assignee	L4-92	X
		TPA File (M-24-91-6)	B2-35	X
		EDMC	H4-22	X

