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06-AMCP-0262

JUL 28 2006

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Addressees:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE REQUEST M-24-06-01, GROUNDWATER PROTECTION, AND MONITORING AND REMEDIATION WELL INSTALLATION PRIORITY LIST FOR CALENDAR YEAR (CY) 2006 THROUGH CY 2009

The purpose of this letter is to transmit the subject Tri-Party Agreement Change Request M-24-06-01 and attachments for your review and approval. If found to be acceptable by the State of Washington, Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA), they will formalize the scope and schedule for the drilling of monitoring wells by the U.S. Department of Energy, Richland Operations Office (RL), for CY 2006 through CY 2009. Since CY 2003, RL has collaboratively worked with Ecology and EPA to develop and maintain an integrated four-year well drilling list that coordinates and prioritizes groundwater monitoring well drilling across the requirements of the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Generally, monitoring needs to comply with the Atomic Energy Act (AEA) are found to be addressed by wells drilled to meet RCRA and CERCLA. Please note that the CY 2006, CY 2007, and CY 2008 milestones were established in the last two negotiation sessions that were concluded in the summers of 2004 and 2005 respectively. This change package adds an additional milestone for CY 2009.

Prior to CY 2004, Tri-Party Agreement Milestone M-24 was negotiated on a yearly basis. Tri-Party Agreement Change Request M-24-02-02, signed on March 1, 2004, identified that a minimum of 60 wells would be drilled between CY 2003 and CY 2006 at a rate of fifteen wells per year. The negotiated rate of fifteen wells per year was confirmed the next year

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when Tri-Party Agreement Change Request M-24-04-01 was signed on August 3, 2004, identifying fifteen wells to be drilled in CY 2007. This rate was further confirmed the following year when Tri-Party Agreement Change Request M-24-05-01 was signed. An additional fifteen wells were identified to be drilled in CY 2008.

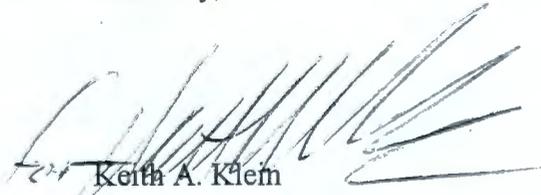
The new approach to Tri-Party Agreement Milestone M-24, negotiated in 2003/2004, set a firm schedule for the current year and set a planning schedule for the three following years. The primary reasons for RL to agree to the new approach were to support our three-year budget planning process and to prioritize wells across RCRA and CERCLA. RL would have confidence in its current year resource requirements to meet Tri-Party Agreement Milestone M-24 on the basis that the three agencies would have been evaluating well needs and priorities during the previous years. Establishing a prioritized four-year rolling well list and schedule also allows our contractor to develop more cost-efficient bid packages for well drilling.

Attachments 1 through 4 to the Tri-Party Agreement Change Request M-24-06-01 identify the wells to be installed CY 2006 through CY 2009. This schedule and priority ranking is consistent with discussions between our agencies occurring over the past four years. You will observe that the fifteen wells required to be installed in CY 2006 and ten of the fifteen wells required to be installed in CY 2007 are complete; we are ahead of schedule, a direct result of this four-year rolling milestone approach. Please let me assure you that all of the wells identified as required through CY 2008 and seven of the wells identified for compliance in CY 2009 are funded under the current RL-30 budget and are planned to be drilled in CY 2007.

Our three agencies have worked diligently to resolve any issues surrounding the installation of the wells and are confident that the integrated approach will be satisfactory. We appreciate Ecology's and EPA's continued support and cooperation with this workscope.

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klem
Manager

AMCP:KMT

Enclosure

cc: See Page 3

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cc w/encl:

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Administrative Record

Environmental Portal

Modifications to existing Tri-Party Agreement milestones are denoted using ~~strikeout~~ for text deletions and **shading** for text additions.

Number	Title	Due Date
<p>M-024-57 (Ecology Lead)</p>	<p>Install a minimum of 60 wells (See attached well list). DOE will initiate discussions annually in June using the data quality objective process (DQO) to reaffirm the selected wells and recommend any new well installations needed to maintain a three-year rolling prioritized drilling schedule consistent with site-wide clean-up priorities. The Parties will conclude negotiations and revise M-024-57 by August 1 of each year to maintain a four year commitment for well installations. The list for CY 20056 is included as Attachment 1 to this TPA change package. Attachment 2 to this TPA change package contains the list of wells to be installed CY 20067, attachment 3 contains wells to be installed CY 2008, and attachment 4 contains wells to be installed CY 2009.</p> <p>Since all wells are drilled in CERCLA or RCRA Past Practice operable units, the parties agreed that the most effective and efficient method of managing wastes from all Hanford well development drilling would be to dispose of the waste in the Hanford Environmental Restoration Disposal Facility (ERDF). This workscope would be conducted under the M-024 series milestones and will need to meet ERDF disposal requirements through the timely submittal of CERCLA sampling and analysis plans (or revisions to existing CERCLA sampling and analysis plans) for the appropriate operable unit, approved by the assigned lead regulatory agency.</p> <p>The integration and coordination of well drilling under the revised Tri-Party Agreement M-024 milestone series will assure CERCLA needs are incorporated into the overall drilling campaign. In addition, the parties reaffirmed their commitment to Section 5.5 of the Tri-Party Agreement Action Plan, the need to coordinate the application of regulatory requirements, and that past-practice authority may provide the most efficient means for addressing mixed-waste groundwater contamination plumes originating from a combination of TSD and past-practice units.</p> <p>In order to ensure that TSD units within the operable units are brought into compliance with RCRA and State hazardous waste regulations, Ecology intends, subject to part four of the Agreement, that all response or corrective actions, excluding situations where there is an imminent threat to the public health or environment as described in Section 7.2.3, will be conducted in a manner which ensures compliance with the technical requirements of the Hazardous Waste Management Act (HWMA) Chapter 70.105 RCW and implementing regulations. Notwithstanding this operating assumption, Ecology reserves the right to exercise its authority under the HWMA and the Hanford Sitewide RCRA Permit, Condition II.Y to require groundwater response actions consistent with WAC 173-303-645 and/or 173-303-646. The management of purgewater and investigation derived wastes from existing wells and wells under the revised M-024 Tri-Party Agreement milestones will be managed as CERCLA wastes in accordance with a CERCLA decision document or sampling and analysis plan, to be disposed at ERDF as long as the wastes meet ERDF disposal acceptance criteria. DOE shall install the following minimum number of wells in accordance with the priorities identified in the yearly DQO:</p> <ul style="list-style-type: none"> - a minimum of 15 wells by 12/31/2003 - a cumulative of 30 wells by 12/31/2004 - a cumulative of 45 wells by 12/31/2005 - a cumulative of 60 wells by 12/31/2006 - a cumulative of 75 wells by 12/31/2007 and, - a cumulative of 90 wells by 12/31/2008 and, - a cumulative of 105 wells by 12/31/2009 <p>Modification to the priority list will be approved at the Project Manager's level.</p> <p>(This milestone will continue on a yearly basis until such time that the Parties agree that sufficient RCRA and CERCLA groundwater wells are in place and operating to comply with RCRA and CERCLA requirements for groundwater monitoring, groundwater protection, and groundwater remediation.)</p> <p>This milestone does not preclude or foreclose the imposition of additional groundwater well installations pursuant to RCRA permits or work plans and/or CERCLA workplans.</p>	<p>Due Dates are as indicated in the descriptive text of this milestone</p>

Calendar year 2006 well listing

Attachment 1: CY 2006 Wells

	Well ID	OU/Other	Comments	Temporary Name	Program/Facility Name/ Locations	Justification/Purpose	Deep Borehole
1	C4855	300-FF-5	699-S20-E10	TBD	300-FF-5	Resolve Modeling Needs	
2	C4685	LLBG	299-W15-152	LLBG-1	RCRA/LLWMA 4, perimeter well approximately 300' south of well 299-W15-16	RCRA IS/FS detection at point of compliance	
3	C4683	LLBG	299-W15-83	LLBG-2	RCRA/LLWMA 4, perimeter well approximately 450' from NE corner and north of well 299-W15-	RCRA IS/FS detection at point of compliance	
4	C4684	LLBG	299-W15-94	LLBG-3	RCRA/LLWMA 4, Replacement or deepening of dry well 299-W15-18	RCRA IS/FS detection at point of compliance/ replacement well for dry well	
5	C4882	BP-5	699-50-59	BP-1	CERCLA/ BP-5 OU/Gable Gap	Defined in 200-BP-5 SAP (DOE/RL-2001-49) (EPA 1 in 2/22/05 mtg)	
6	C4694	ZP-1 well *	299-W11-43	H	CERCLA 200-ZP-1 W of T plant	Rqrd by DOE/RL-2003-55 define W bndry of U plume	X
7	C4695	UP-1 well	299-W19-49	M	CERCLA 200-UP-1 S of U plant	Rqrd by DOE/RL-92-76 define W bndry of Tc plume	X
8	C4966	UP-1 well	299-W19-101	L	CERCLA 200-UP-1 SE of U plant	Rqrd by DOE/RL-92-76 define NE bndry of Tc plume	X
9	C4697	ZP-1 wells	699-50-74	T	CERCLA ZP-1 OU	Rqrd by DOE/RL-2003-55 define N bndry of CCL4 plume	X
10	C4988	LLBG	299-W10-29	LLBG 20	RCRA/LLWMA 3, downgradient well ~200m NNE of well 299-10-13	RCRA detection monitoring downgradient	
11	C5194 (Replaced C4987)	LLBG	299-W10-31 replaced 299-W10-25	LLBG-7	RCRA/LLWMA 3, perimeter well approximately 300' north of well 299-W10-20	RCRA IS/FS detection at point of compliance	
12	C4989	LLBG	299-W10-30	LLBG 21	RCRA/LLWMA 3, downgradient well ~100m NNE of well 299-10-13	RCRA detection monitoring downgradient	
13	C4986	LLBG	299-W15-224	LLBG 4	RCRA/LLWMA 4, perimeter well approximately 150' from NE corner and north of well 299-W15-	RCRA IS/FS detection at point of compliance	
14	C4990	ZP-1/RCRA	299-W11-47	T-3	near the SE Corner of T Tank Farm near Well W-11-41	Assist in the determination of Tc-99 distribution to Basalt	X
15	C4948	ZP-1/RCRA	299-W11-45	T-2	RCRA RL/WMA T/East far-field, at postulated leading edge of Tc-99 plume	Site in Assessment. Downgradient plume characterization per DQO HNF 12236	X

Deep Boreholes are defined as wells drilled below the water table to the mid-or lower aquifer to collect chemical information as specified in project specific sampling and analysis plans.

Completed Wells

Attachment 2

Calendar year 2007 well listing

Attachment 2: CY 2007 Wells

	Well ID	OU/Other	Comments	Temporary Name	Program/Facility Name/ Locations	Justification/Purpose	Deep Bore-hole
1	C4967 replaced by C5193	200-UP-1	299-W19-107 replaced 299- W19-104	UP1	CERCLA/200-UP-1/East of U Plant	Required by DOE/RL-92-76/Define northern boundary of uranium plume	X
2	C4968	200-UP-1	299-W19-105	UP2	CERCLA/200-UP-1/Upgradient of U-8 Crib	Required by DOE/RL-92-76/Determine if contamination is upgradient of U-8 Crib	X
3	C4969	200-UP-1 / RCRA	299-W22-69	UP3	CERCLA/200-UP-1/Downgradient of S Tank Farm - RCRA SST S-SX	Required by DOE/RL-92-76/Determine downgradient extent of groundwater contamination from S Tank Farm - delineate S-SX plumes to east	X
4	C4970	200-UP-1	299-W22-72	UP4	CERCLA/200-UP-1/ Downgradient of S/SX Tank Farm	Required by DOE/RL-92-76/Determine downgradient extent of groundwater contamination from S/SX Tank Farm	X
5	C4971	200-UP-1 / RCRA	299-W22-86	UP5	CERCLA/200-UP-1/ Downgradient of S/SX Tank Farm - RCRA SST S-SX	Required by DOE/RL-92-76/Determine downgradient extent of groundwater contamination from S/SX Tank Farm - delineate S-SX plumes to east	X
6	C4977	200-UP-1/RCRA	299-W22-87	UP11	CERCLA/200-UP-1/ Upgradient of U-12 Crib	Required by DOE/RL-92-76/Determine if contamination is upgradient of U-12 Crib. RCRA upgradient well	X
7	C4999	300-FF-5	399-3-18	300-1	PNNL 300-FF-5 Well 1	300-FF-5 Operable Unit Limited Field Investigation Plan. 2005. DOE/RL-2005-47, Rev.0	X
8	C5000	300-FF-5	399-1-23	300-2	PNNL 300-FF-5 Well 2	300-FF-5 Operable Unit Limited Field Investigation Plan. 2005. DOE/RL-2005-47, Rev.0	X
9	C5001	300-FF-5	399-3-19	300-3	PNNL 300-FF-5 Well 3	300-FF-5 Operable Unit Limited Field Investigation Plan. 2005. DOE/RL-2005-47, Rev.0	
10	C5002	300-FF-5	399-3-20	300-4	PNNL 300-FF-5 Well 4	300-FF-5 Operable Unit Limited Field Investigation Plan. 2005. DOE/RL-2005-47, Rev.0	
11	C5101	200-ZP-1	299-W11-86	ZP1	CERCLA/200-ZP-1/Bound contamination in vicinity of Either Old Laundry Facility or T Plant	Purpose to define depth and extent of CCL4 contamination	X
12	C5102	200-ZP-1	299-W14-71	ZP2	CERCLA/200-ZP-1/Bound contamination in vicinity of Either Old Laundry Facility or T Plant	Purpose to define depth and extent of CCL4 contamination	X
13	TBD	KR-4 (TPA#75)	TBD	KR-3	CERCLA/100-KR-4 OU/River upgradient of K-126, downgradient of 699-78-62	TBD	
14	TBD	100-KR-4 (TPA#84)	TBD	KE-1	CERCLA/K-Basins	Replacement well; AEA monitoring downgradient of KE Basin	
15	TBD	100-KR-4 (TPA#85)	TBD	KE-2	CERCLA/K-Basins	Replacement well; AEA monitoring downgradient of KE Basin	

Deep Boreholes are defined as being drilled below the water table to the mid-or lower aquifer to collect chemical information as specified in project specific sampling and analysis plans.

Completed Wells

Calendar year 2008 well listing

Attachment 3: CY 2008 Wells

	Well ID	OU/Other	Comments	Temporary Name	Program/Facility Name/ Locations	Justification/Purpose	Deep Bore-hole
1	C5103	200-ZP-1	299-14-72	ZP3	CERCLA/200-ZP-1/Bound contamination in vicinity of Either Old Laundry Facility or T Plant	Purpose to define depth and extent of CCL4 contamination	X
2	TBD	200-ZP-1	TBD	ZP4	TBD	Gather Supplemental data for RI/FS process.	X
3	TBD	200-ZP-1	TBD	ZP5	TBD	Gather Supplemental data for RI/FS process.	X
4	C5298	100-HR-3	199-D5-95	HR3-1	TBD	Monitoring at 100-D	
5	C5299	100-HR-3	199-D5-96	HR3-2	TBD	Monitoring at 100-D	
6	C5300	100-HR-3	199-D2-9	HR3-3	TBD	Monitoring at 100-D	
7	C5195	200-BP-5	299-E33-50	BP5-1	Confined Aquifer Well	Gather Supplemental data for RI/FS process.	X
8	C5196	200-BP-5	699-48-54B	BP5-2	TBD	Gather Supplemental data for RI/FS process.	X
9	C5197	200-BP-5	699-50-56	BP5-3	TBD	Gather Supplemental data for RI/FS process.	X
10	C5243	200-ZP-1/RCRA	299-W11-48	T4	241-T Farm	99TC RI/FS. RCRA SST WMA T plume assessment well.	X
11	C5244	200-ZP-1/RCRA	299-W10-32	T5	241-T Farm	99TC RI/FS. RCRA SST WMA T plume assessment well.	X
12	TBD	LLBG	TBD	LLBG-6	RCRA/LLWMA 4, replacement or deepening of dry well 299-W18-24	RCRA IS/FS detection at point of compliance/ replacement well for dry well	
13	TBD	LLBG	TBD	LLBG-8	RCRA/LLWMA 3, perimeter well near well 299-W10-19	RCRA IS/FS detection at point of compliance/ near a dry well	
14	TBD	LLBG	TBD	LLBG-9	RCRA/LLWMA 3, perimeter well approximately 300 ft NE of well 299-W10-19	RCRA IS/FS detection at point of compliance	
15	TBD	LLBG	TBD	LLBG-10	RCRA/LLWMA 3, replacement or deepening of dry well 299-W7-10	RCRA IS/FS detection at point of compliance/ replacement well for dry well	

Deep Boreholes are defined as wells drilled below the water table to the mid-or lower aquifer to collect chemical information as specified in project specific sampling and analysis plans.

Completed Wells

Calendar year 2009 well listing

Attachment 4: CY 2009 Wells

	Well ID	OU/Other	Comments	Temporary Name	Program/Facility Name/ Locations	Justification/Purpose	Deep Bore-hole
1	TBD	200-UP-1	TBD	UP-6	South of ERDF at Fenceline	Gather Supplemental data for RI/FS process.	X
2	TBD	200-UP-1	TBD	UP-7	600 Area East of S-14 Crib	Gather Supplemental data for RI/FS process.	X
3	TBD	200-UP-1/RCRA	TBD	UP-8	600 Area By 299-W27-2 - S10-Pond and Ditch	Gather Supplemental data for RI/FS process. compliant detection network for S-10. Downgradient RCRA detection well	X
4	TBD	200-UP-1/RCRA	TBD	UP-9	600 Area South of S-10 Ditch	Gather Supplemental data for RI/FS process. Possible downgradient RCRA well for S-10 Pond	X
5	TBD	200-UP-1/RCRA	TBD	UP-10	600 Area by 299-W26-14 S10-Pond and Ditch	Chromium monitoring well .	X
6	TBD	200-UP-1/RCRA	TBD	UP-12	SE Corner of 200 West Area	Gather Supplemental data for RI/FS process. Possible downgradient U-12 RCRA well.	X
7	TBD	200-ZP-1	TBD	ZP6	TBD	Gather Supplemental data for RI/FS process.	X
8	TBD	200-BP-5	TBD	BP5-4	TBD	Gather Supplemental data for RI/FS process.	X
9	TBD	200-BP-5	TBD	BP5-5	TBD	Gather Supplemental data for RI/FS process.	X
10	TBD	200-BP-5	TBD	BP5-6	TBD	Gather Supplemental data for RI/FS process.	X
11	TBD	200-BP-5	TBD	BP5-7	TBD	Gather Supplemental data for RI/FS process.	X
12	TBD	200-BP-5	TBD	BP5-8	TBD	Gather Supplemental data for RI/FS process.	X
13	TBD	SST WMA A-AX	Replace corroded wells	A-6	RCRA SST A-AX	replaces well 299-E25-40	X
14	TBD	RCRA/UP-1	Replacement for dry well	U-1	RCRA SST U	Well 299-W18-31 dry in <2 years	
15	TBD	RCRA / UP-1	Replacement for dry well	S-5	RCRA SST S-SX	Well 299-W22-48 dry in <3 years	X

Deep Boreholes are defined as being drilled below the water table to the mid-or lower aquifer to collect chemical information as specified in project specific sampling and analysis plans.

Completed Wells