



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

**DEC 29 2000**

01-RCA-106

Mr. Michael A. Wilson, Program Manager  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504

**RECEIVED**  
JAN 18 2001  
**EDMC**

Dear Mr. Wilson:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE REQUEST (CR) M-24-00-03, MODIFY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) WELL INSTALLATION INTERIM MILESTONES M-24-46, M-24-48, M-24-49 AND M-24-50

The attached change request formalizes the communications between the U.S. Department of Energy, Richland Operations Office (RL) and the State of Washington Department of Ecology (Ecology) on the ten RCRA compliant monitoring wells to be installed by December 2000. On December 13, 2000, Ecology notified RL that Ecology accepted RL's proposal because it was clear that RL had made every attempt to meet the intent of the M-24 milestone. The well location exchanges are embodied in the attached change request.

This correspondence additionally provides notification of the successful completion of Major Milestone M-24-00L, and it's supporting Interim Milestones M-24-46, M-24-47 and M-24-48, based upon Ecology's approval of the attached CR. If you have any questions, please contact me, or your staff may contact Jon Yerxa, Office of Regulatory Liaison, on (509) 376-9628, or Marv Furman, Groundwater/Vadose Zone Project, on (509) 373-9630.

Sincerely,

Clifford E. Clark, Acting Program Manager  
Office of Regulatory Liaison

RCA:JKY

Attachment

cc: See page 2

<b>Change Number</b> M-24-00-03	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	December 21, 2000
<b>Originator</b> K. M. Thompson/J. Yerxa		<b>Phone</b> 509-373-0750/509-376-9628
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
<b>Change Title</b> Modify RCRA Well Installation Interim Milestones M-24-46, M-24-48, M-24-49 and M-24-50		
<b>Description/Justification of Change</b> Operational difficulties were encountered that jeopardizes the on-schedule completion of Tri-Party Agreement Major Milestone M-24-00L and Interim Milestone M-24-48 by December 31, 2000. At a depth of approximately 187 feet (70 feet from the required well depth), Well 299-W15-762, located in the TX-TY Waste Management Area (WMA), the driller encountered equipment problems at 177 feet. While alternative drilling strategies are being investigated, it places completion of this well at risk.  On December 13, 2000, the Department of Energy notified Ecology about the operational difficult (see attached email). To meet the intent of the M-24-00L Major Milestone, Install 10 RCRA compliant monitoring wells by December 31, 2000, it was proposed that the well experiencing the difficulties (299-W15-762) be exchanged for one that could be completed by December (299-W-23-21). On December 14, 2000, Ecology notified DOE that the proposal was acceptable to them (email attached).  The overall scope of well installation remains unchanged. This change request simply modifies the order of well installations.  Milestone revisions are on page 2.		
<b>Impact of Change</b> Administrative action required to incorporate this change into Appendix D		
<b>Affected Documents</b> Hanford Federal Facility Agreement and Consent Order Action Plan – Appendix D.		
<b>Approvals</b>  DOE <u>W. Wade Ballard</u> <u>12/21/00</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date  EPA                      _____                      _____                      Approved                      Disapproved Date  Ecology                      _____                      _____                      Approved                      Disapproved Date		

Modifications authorized by this change request are as follows:

M-24-00L Interim Milestones revisions

M-24-46	Install <del>two (2)</del> three (3) additional wells at SST WMA S-SX	December 2000
M-24-47	Install four (4) additional wells at SST WMA T	December 2000
M-24-48	Install <del>four (4)</del> three (3) additional wells at SST WMA TX-TY	December 2000

M-24-00M Interim Milestones revisions

M-24-49	Install <del>four (4)</del> three (3) wells in WM S-SX; 1 upgradient well and 3 downgradient wells	April 2001
M-24-50	Install <del>one (1)</del> two (2) well in WMA TX-TY: 1 downgradient well	April 2001

NOTE: ~~Strike out~~ text indicates text to be deleted, shading indicates proposed text.

Attachment to Change Request M-24-00-03  
E-mail Notifying Ecology and Ecology's Agreement with Proposed Path Forward

-----Original Message-----

**From:** Hedges, Jane (ECY) [mailto:jhed461@ECY.WA.GOV]  
**Sent:** Thursday, December 14, 2000 1:29 PM  
**To:** 'Marvin\_J\_Furman@RL.gov'  
**Cc:** 'gaday@mail.bhi-er.com'; Goswami, Dib; Huckaby, Alisa; Brown, Melinda J.; Caggiano, Joseph; 'bawilliams@pnl.gov'; Stanley, Roger  
**Subject:** Timely Completion of TPA Milestone M-24  
**Importance:** High

Marv: Alisa and I discussed the issues surrounding the difficulty you faced with drilling the final well (for the TX-TY farm) to meet the ten RCRA compliant wells specified in M-24-00L. It is very clear to us that with the 10 wells you have drilled (including the additional well in S-SX) you have clearly made every attempt to meet the intention of the M-24 agreement. We appreciate your efforts in the field and the notification in advance of the December 31 deadline. Based on the information in your email to Alisa and Dib on December 13, Ecology agrees that the proposal meets the milestone requirements for M-24-00L. Happy Holidays to you and your contractors, we look forward to continuing this successful working relationship in the upcoming year! Jane

**From:** Furman, Marvin J  
**Sent:** Wednesday, December 13, 2000 11:10 AM  
**To:** Goswami, Dibakar; Huckaby, Alisa D  
**Cc:** Day, Garrett A; Williams, Bruce A  
**Subject:** Timely completion of TPA Milestone M-24  
**Importance:** High

Dib, Alissa:

We've run into some operational difficulties (see following description) that jeopardizes the completion of M-24-00L by December 31. To meet the intent of the milestone to install ten RCRA compliant monitoring wells by December 31, we are proposing a swap for the well experiencing difficulties ( W299-W15-762, located south of TX-TY, the replacement for one that encountered shallow rad contamination, and the last of the 10 wells of M-24-00L) with one scheduled for S-SX WMA: well 299-W23-21. The problematical well will then be completed within the specified time for M-24-00M, April, 2001. The present indications are that the situation at W299-W15-762 will not be recoverable in time to meet the December 31 schedule completion date.

Description of Operational Problem:

At around noon today (12/12/2000), we reached a depth of approximately 187 feet (70 feet from our required well depth). Indications are that the driller may have parted his casing at a depth of 177 feet. We are presently addressing the problem to determine if the situation can be corrected, and back to drilling this week. If not, we may have a problem by having to drill another replacement boring which may result in us not getting this well completed by the required milestone date

Dear Mr. Wilson  
01-RCA-106

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cc w/attach:

T. E. Logan, BHI  
J. H. Richards, CTUIR  
J. A. Hedges, Ecology  
A. D. Huckabe, Ecology  
R. F. Stanley, Ecology  
D. R. Sherwood, EPA  
J. S. Hertzell, FHI  
O. S. Kramer, FHI  
E. J. Murphy-Fitch, FHI  
M. Reeves, HAB  
P. Sobotta, NPT  
M. L. Blazek, Oregon Energy  
B. A. Williams, PNNL  
R. Jim, YN  
Administrative Record