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Tri-Party Agreement

January 21, 1993

Dear Interested Citizen:

Thank you for your comments regarding installing Resource Conservation and Recovery Act (RCRA) standard groundwater monitoring wells on the Hanford Site. The Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy appreciated your comments about monitoring wells at Hanford.

The agencies considered your comments about the Hanford Federal Facility Agreement and Consent Order (Hanford Tri-Party Agreement) Milestone 24-00, before finalizing changes to Milestone 24. Milestone 24 directs the installation of Hanford's RCRA standard groundwater monitoring wells.

Enclosed please find the Hanford Tri-Party Agreement RCRA groundwater monitoring wells change control form and the agencies' response to comments.

For further information, please contact Mary Getchell, Ecology, P.O. Box 47600, Olympia, WA 98504-7600, 1-800-321-2008. Thank you.

Sincerely,

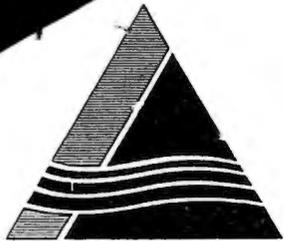
David B. Jansen, P.E.
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HANFORD TRI-PARTY AGREEMENT
MILESTONE-24: RCRA GROUNDWATER MONITORING WELLS
SUMMARY OF PUBLIC COMMENTS

January 21, 1993

Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy (USDOE) conducted a 45-day public comment period to obtain public comments about draft changes to the Hanford Federal Facility Agreement and Consent Order (Hanford 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 and ended June 3. Three individuals and organizations provided written comments about the proposed changes.

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

SEATTLE
University of Washington
Suzzallo Library
Government Publications Room
Mail Stop Fm-25
Seattle, WA 98195
(206) 543-4664
Attention: Eleanor Chase

SPOKANE
Gonzaga University
Foley Center
East 502 Boone
Spokane, WA 99258
(509) 328-4220, Ext. 3125
Attention: Lewis Miller

PORTLAND
Portland State University
Bradford Price Millar Library
SW Harrison and Park
P.O. Box 1151
Portland, OR 97207
(503) 725-3690
Attention: Michael Bowman

RICHLAND
DOE-RL Public Reading Room
Washington State University/Tri-Cities
100 Sprout Road
Room 130
Richland, WA 99352
(509) 376-8583
Attention: Terri Traub

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

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HANFORD TRI-PARTY AGREEMENT
MILESTONE 24: RCRA GROUNDWATER MONITORING WELLS
SUMMARY OF COMMENTS AND RESPONSES
January 21, 1993

RESPONDENT: USDOE

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 USDOE 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

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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 USDOE 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 USDOE 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.

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