

# START

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DON'T SAY IT --- Write It!

DATE: January 21, 1991

TO: 183-H Unit Managers

FROM: R. E. Peterson   
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Telephone: (509) 376-5858

SUBJECT: Purgewater Discharge in 100-H Area, Well 199-H4-3

The following is a brief summary of what happened during the sampling of a well in the 183-H Basins monitoring network during early December:

- Wells in the area were being sampled by PNL as part of the routine Sitewide Monitoring program. WHC had asked PNL to visit several 183-H network wells in addition to the sitewide network wells, in order to obtain water samples that could be screened for the typical contaminant indicators for the 183-H basins (nitrate and chromium). We were trying to bridge the data gap while a new analytical services contract was being negotiated.

The sample bottles prepared for well 199-H4-3 had incorrect labels attached to them; the labels did not include the symbol used to indicate that any groundwater purged from the well must be contained at the well site -- for later disposal. Consequently, the sampler discharged the excess purgewater to the surrounding soil. The error in sample bottle labels wasn't immediately discovered. The labeling error occurred because an out-dated list for wells requiring purgewater containment was used.

- The groundwater involved is not overly hazardous. It does contain nitrate, gross alpha, gross beta, and chromium concentrations that are somewhat above drinking water standards. The elevated chromium concentration is the reason for containing any purgewater from 100-H Area wells, per the Purgewater Handling Strategy agreement between DOE and Ecology.
- WHC asked PNL for a Deficiency Report that described the event, and explained why it occurred. Our Statement of Work with them requires that they follow certain procedures, including the Purgewater Handling Strategy, with regard to RCRA-sponsored work. They provided us with such a report on January 4, 1991.
- Upon initial discovery of the event, there was uncertainty as to whether it constituted a "reportable occurrence" under DOE Order 5000.3A. Both PNL and WHC staff felt that it did not fit the policy stated in that Order, since there was no apparent threat to health and safety, nor significant degradation of the environment. An informal call to DOE-RL produced a response that agreed with our opinion, but added a suggestion that WHC prepare a letter to Ecology (for DOE's signature) that described what had occurred. PNL went ahead and filed a formal "off-normal" occurrence report with DOE anyway.

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- Meanwhile, DOE-RL directed WHC, through the our Environmental Waste Management office, to also prepare an occurrence report, and to upgrade its category to an "unusual" occurrence.
- So, that's about it. The reports are completed and have been distributed to all concerned by the Occurrence Notification Center. We are awaiting a response from DOE-HQ.

In the interim, PNL has updated its list of wells requiring purgewater containment.

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