

START 9513306, 0716
RELEASE INSTRUCTIONS (RI)

DOCUMENT NO.:
 WHC-CM-7-7
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<p>TO: DEBRA A ISOM H6-08 0176</p>	<p>TITLE: Environmental Investigations and Site Characterization RELEASE NO.: 99 DATE PREPARED: 10/18/95</p>
<p>I have entered this release into the document per instructions. <i>Debra A. Isom</i> 10/24/95 Signature Date</p>	<p>If you have any questions about this release contact: Jean Feaster Phone: 372-2340</p>

INSTRUCTIONS

1. REMOVE AND/OR INSERT INDICATED SECTIONS INTO DOCUMENT AS SHOWN BELOW.
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RELEASE INSTRUCTIONS (RI)

IMPLEMENTATION NOTICE

(ROUTE A COPY OF THE IMPLEMENTATION NOTICE TO ALL USERS OF THIS COPY OF THE MANUAL)

EII 1.2, Preparing and Revising Procedures, Rev 8, Change 1:

- Use of Controlled Manual Document Change Requests (CMDRC) clarified in Section 4.5, Requesting Change to Procedures.
- Approval steps clarified in Section 4.4.
- Added Section 4.10 on biennial procedure review period.
- Updated records section to reflect current practice.

Impact: Reduce the amount of CMDRCs generated.

EII 5.11, Sample Packaging and Shipping, Rev. 3, Page Change 3:

The italicized addition was made to Section 6.1, item 4 to show clarification on ice placement in ice chest as noted on ISR-E95-046.

EII 10.3, Purgewater Management, Rev 4, Change 2:

Change 2 incorporates comments received from Tank Farms Transitions Projects.

No impact.



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ICA = INSTRUCTION CHANGE AUTHORIZATION, (P) = PERMANENT (BLUE SHEET), (T) = ONE TIME (GOLDENROD SHEET)

Preparing and Revising Procedures**1.0 PURPOSE**

This procedure establishes the methods for preparing, reviewing, revising, canceling and approving procedures used for environmental activities.

2.0 SCOPE

This Environmental Investigations Instruction (EII) applies to all procedures prepared for issue and use in this manual and in the WHC-CM-7-8 manual.

3.0 DEFINITIONS

Definitions of terms and acronyms used in the EIIs are located in the Glossary/Acronyms section of this manual. Special terms used in the WHC-CM-7-8 manual are defined where needed in the procedures.

4.0 PROCEDURE**4.1 Preparing Procedures**

- Author
1. Develop and format or revise the procedure in accordance with WHC-CM-3-6, Section 2.6.
 2. Determine the intended users for the document.
 3. Designate the organizations that must review the draft:
 - a. Designate those organizations specifically called out by name for responsibilities or tasks (outside of the Hanford Technical Services (HTS) organization). They will be the "designated reviewing organizations."
 - b. Designate other appropriate organizations both internal to the organization and courtesy reviewers.
 4. Inform groups or functions before making them responsible for using or reviewing the document.
 5. Prepare a draft of the procedure and include the designated reviewing organization list, other reviewers, and implementation notice.
 6. Forward the procedure package containing the following to the procedure processing point of contact (POC):
 - a. Wordperfect file and/or hard copy
 - b. Forms and attachments
 - c. Draft implementation notice
 - d. List of required designated reviewing organizations and other reviewers.

Preparing and Revising Procedures

- POC
7. Assign a procedure number and, when needed, notify each of the organizations identified by the author that a procedure intended for their use and/or review is being prepared.
 8. If the procedure references other controlled manuals, check the correctness of citations (such as MRP 2.16 of WHC-CM-1-3), to ensure that the cited section is still a part of the referenced manual.
 9. Ensure the format meets the requirements, including the forms and records sections. Prepare the Controlled Manual Action Transmittal (CMAT), WEF013, adding and modifying the implementation notice as needed.
- NOTE: If there are no designated reviewing organizations outside of the originating organization, indicate "none" in the block on the CMAT form.
10. Identify any special circumstances (e.g, procedure revision required in response to work stoppage, safety hazard, audit, surveillance) requiring a shorter review period on the CMAT.
 11. Forward the review package (CMAT and procedure) electronically to the reviewers. Send hard copies as requested.

4.2 Reviewing Procedures

- Reviewers
1. Review the draft to ensure that any requirements and procedures relating to your organization are clear, correct and usable.
 - a. If you are reviewing for a designated reviewing organization, (outside HTS), submit a CMAT with comments or "no comments" to the POC by the specified date.
 - b. If you are an originating organization internal reviewer, submit a CMAT by the specified date.
 - c. If you are a courtesy reviewer and have comments, submit them on a CMAT by the due date.

NOTE: Courtesy comments are resolved at the option of the originating organization.

2. If extensions are required, contact the POC.
- POC
3. If a designated reviewing organization fails to submit a response by the final cutoff date, send a memo documenting the missed review to the organization CMPOC and retain a copy of the memo in the file.

Preparing and Revising Procedures

4. After the comment review period closes, collect all of the comments received and forward the CMAT forms to the author for disposition.

4.3 Resolving Comments

- | | |
|----------------------|---|
| Author | <ol style="list-style-type: none">1. Consider all of the comments received from the reviewers.2. If there are proposed changes and suggestions from designated reviewing organizations that you think should not be used, contact the reviewer and/or reviewing organization CMPOC to resolve the issues. Try to reach a resolution that addresses the reviewer's concerns while ensuring that the document meets its intent.3. Resolve internal and designated reviewing organization comments to your satisfaction.4. Enter agreed upon resolution(s) on the CMAT form.5. Incorporate comment resolutions by marking up the draft revision. |
| Designated Reviewers | <ol style="list-style-type: none">6. Help the author resolve your organization's comments promptly. Try to develop alternatives that satisfy the needs of both organizations. |
| Author | <ol style="list-style-type: none">7. Provide the POC with a marked up copy of the procedure and completed CMATs. |
| POC | <ol style="list-style-type: none">8. Prepare the final procedure for approval.9. If the document includes designated reviewing organizations outside your own organization, complete a Controlled Manual Review and Approval Summary (CMRAS), WEF012 to document that the designated reviewing organizations have accepted the resolution of their comments. |

4.4 Approving Procedures

- | | |
|-----|--|
| POC | <ol style="list-style-type: none">1. Assemble the approval package, ensuring that the implementation notice is correct and reflects the final version of the document.2. Obtain the signature of the responsible manager <i>for procedures within WHC-CM-7-8. Obtain the signature of the responsible manager and the HTS organizational manager on the CMRAS for procedures within WHC-CM-7-7.</i>3. Prepare a procedure release package and transmit to Unclassified Document Control for reproduction and distribution. |
|-----|--|

Preparing and Revising Procedures

4.5 Requesting Changes to Procedures

Any Employee 1. *If you are not the procedure author, complete a CMDCR to request changes to procedures in the WHC-CM-7-7 or WHC-CM-7-8 manuals. Send CMDCR to the POC.*

2. *If you are the procedure author, mark-up a copy of the procedure, provide justification for the changes and forward to the POC. A CMDCR may be prepared, but is not required.*

NOTE: The POC will prepare the revised procedure for review (beginning with Section 4.1, step 10 of this procedure) or approval, based on the nature of the changes.

POC 3. Forward the CMDCR and notification of previous commitments to the assigned author.

Procedure Author 4. Promptly review each CMDCR received.

5. Notify the CMDCR originator how your organization has decided to respond to their request.

a. If a decision cannot be made within 30 days, contact the CMDCR initiator and the POC to tell them when to expect a decision.

6. Return approved CMDCR to the POC.

4.6 Obtaining a Controlled Copy of a CM

Any Employee 1. Send the requestor's name, payroll number, MSIN, organization code, TPCN, the manual numbers and titles of the manuals requested to cc:Mail mailbox ^WHC Unclassified Document Control (or MSIN A4-18).

4.7 Incorporating an Instruction Change Authorization (ICA)

POC 1. Issue a procedure change or revision to incorporate changes required by a permanent ICA issued per EII 1.4.

4.8 Making Minor Nontechnical Changes

POC 1. When a minor nontechnical change to a procedure is required, generate a CMDCR *or CMRAS* for justification and description, then make the required change(s).

Preparing and Revising Procedures

2. *Forward the revised procedure and the CMRAS or CMDCR to the appropriate managers for approval.*

4.9 Canceling Procedures

- Any employee 1. Submit a CMDCR for approval of cancellation to the POC.
- POC 2. Transmit the CMDCR and a CMRAS to the manager or author assigned the responsibility for the procedure.

NOTE: If a CMDCR was not used, provide justification on the CMRAS form.

- Cog Manager/
 Approval
 Authority 3. Sign the CMRAS for final approval of the cancellation.

- POC 4. *Prepare a procedure release package for removal of the procedure and transmit to Unclassified Document Control for reproduction and distribution.*

4.10 Biennial Procedure Review

- POC 1. *Send a notice to authors when procedures have not been reviewed or revised within a 2 year period. Retain a copy of the notice in the history file.*

5.0 RECORDS

Record processing and disposition is in accordance with the following table.

Name Filing Unit Title or Description	Record Type*	Retention Period	Disposal Authority	Cut-off and Retirement Instructions
<i>Release packages, including MRIs ICAs, page changes, procedures)</i>	QA	Lifetime	DRS 14.6a	<i>Record copies are transmitted to Document Processing & Distribution for archival storage by Unclassified Document Control.</i>
Procedure packages, revisions, page changes, ICAs, review documentation, CMRAS, CMDCRs.	R	2 years or when no longer needed	GRS 23.1	History files are maintained by the POC until no longer needed.

* R = Other Record Material, QA = Quality Assurance Records.

6.0 DESIGNATED REVIEWING ORGANIZATIONS

The Hanford Technical Services (HTS) organization is the process owner and reviews all but minor changes to this document. Comments from other reviewers are welcome, but are resolved at the process owner's option.

7.0 FORMS

Controlled Manual Document Change Request (A-6000-269, WEF017)

Controlled Manual Review and Approval Summary (A-6000-359, WEF012)

Controlled Manual Action Transmittal (A-6000-252, WEF013)

Instruction Change Authorization (A-6000-370, WEF158)

8.0 REFERENCES

WHC-CM-1-3, *Management Requirements and Procedures*, MRP 2.16, *"Processing CM System Procedures."*

WHC-CM-3-6, *Uniform Publications System*, Section 2.6, "Formatting CMs."

WHC-CM-7-8, *Environmental Activities*.

11. Absorbent packing material (e.g., "insulating" vermiculite).
12. "Fresh" water ice or frozen coldpacks (blue ice) if needed.
13. "Bubble wrap" or equivalent cushioning material.

6.0 PROCEDURE

NOTE: Coordinate with Health Physics on the total activity/specific activity requirements for samples being sent offsite in accordance with WHC-CM-4-10, Section 9.0.

Samples received by WHC Shipping by 13:00 hours will minimize shipping delays.

6.1 PACKAGING AND SHIPPING (NONHAZARDOUS) BACKGROUND SAMPLES

This section presents guidelines and requirements to properly package and ship nonhazardous (background) samples. Always follow the guidance given by WHC Transportation Logistics regarding packaging of sample shipments. If there is a discrepancy between their guidance and this EII, follow Transportation Logistics requirements.

NOTE: Steps with the character (G) are guidelines, and steps with the character (R) are requirements. They should be performed in the order most logical to fit individual project needs.

1. (G) Prior to sampling (at least 1 week), contact WHC Transportation Logistics and supply them with the following information to enable them to recommend the proper shipping container for the samples:
 - a. Sample media.
 - b. Approximate number of samples to be shipped per day and size (volume/weight) of individual sample or sample containers.
2. After sampling is performed, do the following substeps:
 - a. (R) Label and seal (evidence tape, dated and initialed) each sample container.
 - b. (G) Place the sample container in a plastic bag and seal.
3. (G) Place sample(s) in shipping container lined with plastic.
4. (R) Place fresh water ice or frozen coldpacks (blue ice) in the container, if cooling is required. *Ensure that the sample bottle labels are protected from the ice water within the ice chest in such a way that they will not fall off the bottle during sampling and transport.*
5. Pack sample(s):
 - a. (G) with enough compatible and absorbent cushioning material (e.g., insulating vermiculite)

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SAMPLE PACKAGING AND SHIPPING

5. Pack sample(s):
 - a. (G) with enough compatible and absorbent cushioning material (e.g., insulating vermiculite)
 - b. (R) by covering all exposed glass or other fragile container surfaces with bubble wrap.
 6. (G) Seal plastic liner bag of the DOT-approved shipping container.
 7. (R) Complete the following forms. Ensure sample numbers on the forms match the samples in the shipping container.
 - a. Sample Analysis Request (SAR).
 - b. Chain of Custody.
- NOTE: If samples are being delivered to an offsite or onsite laboratory via a U.S. Department of Energy (DOE) vehicle, omit remainder of Section 6.1 and deliver samples and documentation to the laboratory.
- c. Off-Site Property Control (OSPC).
8. (G) Write "NEXT DAY SERVICE" on the OSPC form to ensure overnight delivery, if required.
 9. (R) Have the Health Physics Technician (HPT) sign the OSPC form with an unconditional release.
 10. (R) Take the shipping container with samples and documentation to WHC Shipping (1100 Area).
 11. (G) Obtain serial number from WHC Property Management, and write this number on the Chain of Custody form.
 12. (R) Obtain from WHC Shipping the Bill of Lading/Airbill number for sample shipment. Write this number on the OSPC form. On the OSPC form, indicate the type of compatible and absorbent cushioning material used, and enter the sample numbers in the description block.
 13. (R) Request that WHC Shipping includes the shipping container number on the Bill of Lading/Airbill. Sample numbers can be added to an addendum page if an Airbill is used.
 14. (R) Complete the "Relinquished by:" block on the COC form.
 15. (R) Make copies of documentation for HASM.
 16. (R) Place the SAR, Chain of Custody forms, and any associated radiological screening reports, total activity report or HPT documentation in a sealed plastic bag and place inside a DOT-approved shipping container.
 17. (R) Secure and seal (e.g., strapping tape) the shipping container lid; then place evidence tape (dated and initialed) on container.

Purgewater Management

1.0 PURPOSE

The purpose of this environmental investigations instruction (EII) is to implement the requirements established in the "Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington" (Strategy Document) and procedures found in Westinghouse Hanford Company (WHC) manuals.

2.0 SCOPE

This EII applies to the management of purgewater that is generated from the development, remediation, maintenance, aquifer testing, and sampling of the Hanford Site groundwater monitoring wells collected by WHC or contractors performing work for WHC. The application covers activities from the time of purgewater generation to its *discharge to* either a storage facility or the soil column.

3.0 DEFINITIONS

See the Glossary/Acronym section in this manual.

4.0 REQUIREMENTS

4.1 Safety

1. Personnel performing the varied activities in regard to purgewater collection, handling, transportation, and storage shall comply with the specific site safety requirements.
2. Purgewater containment vehicles operated in radiological areas and that have fixed contamination within the cargo area exceeding the values of Table 2-2, in *Chapter 2 of the Hanford Site Radiological Control Manual, HSRCM-1*, shall have "Regulated" placards permanently affixed to the front, back, and both sides of the vehicles.
3. General Precautions for handling of all purgewater.
 - a) Do not drink purgewater.
 - b) Purgewater spilled directly or indirectly on the skin, will in general, not be an immediate health hazard. However, if purgewater comes in contact with the skin, review the site-specific safety documents and notify the person in charge (PIC) at the site to determine if a survey should be conducted by the local Health Physics Technician (HPT).
 - c) Wear rubber gloves while handling hoses or other equipment when loading and unloading tank trucks.
 - d) If purgewater splashes in the eyes or is swallowed accidentally, report to the nearest first aid station and HP office for examination and treatment.

Purgewater Management

4.2 Purgewater Spill

1. WHC employees shall immediately report any accidental spill of purgewater, exceeding 113 liters (30 gal.), to their management.
2. Management shall implement response actions, investigate and categorize the event per WHC-CM-1-5, Section 7.1.

NOTE: When investigating and categorizing a purgewater spill, consideration should be given to Para. 3.6.2 of the Strategy Document which states that purgewater management at Hanford is not subject to the groundwater listed waste designation procedures as set forth in WAC Chapter 173-303.

4.3 Training

1. Support personnel shall receive training as mandated by WHC-CM-7-7, EII 1.1, "Hazardous Waste Site Entry Requirements".
2. Newly hired purgewater truck drivers shall receive a documented briefing on this procedure which shall include a hazardous material orientation for purgewater transportation.

4.4 Purgewater Collection

1. Purgewater from WHC monitored wells shall be appropriately managed in accordance with health and environmental-based purgewater collection criteria factored into the "Purgewater Strategy Implementation List" ("No Dump" list) of wells.
2. Purgewater extracted from wells not listed, or listed as "Contain Purge Water", in Item 1 above, shall be collected and stored unless a documented purgewater determination has been performed to provide evidence that existing contaminants are found in quantities less than the collection criteria.
3. Purgewater containing constituents in concentrations lower than the collection criteria can be discharged to the soil at or in the immediate vicinity [approximately 15 meters (50 ft.)] of the well head when such wells do not monitor;
 - a. designated RCRA Solid Waste Management Units (SWMUs),
 - b. burial grounds,
 - c. active/inactive liquid effluent disposal sites,
 - d. known surface or subsurface soil contamination areas.

Purgewater from wells in the areas cited above shall be contained.

4. Purgewater required to be contained shall be stored in the 600 Area Purgewater Storage and Treatment Facility (storage facility).

Purgewater Management**5.0 INTERFACES****5.1 Westinghouse Hanford Company (WHC)**

1. Generates purgewater from sampling groundwater monitoring wells, well development, aquifer testing, well maintenance and remediation.
2. Provides analytical data input from purgewater collection determinations per WHC-CM-7-8, Vol. 4, Section 6.1, "Purgewater Collection Determination".
3. Manages the purgewater storage facility for receipt of purgewater generated by all site contractors in accordance with Tank Farm Plant Operating Procedure (POP), TO-040-010, "Perform Operations/ Surveillance - Purgewater Storage Facility".

5.2 ICF Kaiser Hanford

1. Provides WHC, its contractors, and contractors supporting WHC work, with purgewater collection and transportation services from the well site to the storage facility.

5.3 Pacific Northwest Laboratories (PNL)

1. Generates purgewater from sampling groundwater monitoring wells, well development, aquifer testing, well maintenance and remediation.
2. Provides controlled distribution of the "Purgewater Strategy Implementation List" ("No Dump" list). Persons with questions regarding the "No Dump" list may call 372-0069.
3. Utilizes analytical data to revise the "No Dump" list.

5.4 Bechtel Hanford Incorporated (BHI)

1. Generates purgewater from sampling groundwater monitoring wells, well development, and aquifer testing, as described in the Environmental Restoration Contract (ERC).
2. Maintains and updates the Purge Water Activities Database.

6.0 PROCEDURE**6.1 Planning**

Site Management shall:

1. Use the "No Dump" list to determine if purgewater from the assigned groundwater well activity is to be contained.

Purgewater Management

- If the well number is listed and is designated for containment, an update of the containment determination, may be requested from WHC, *Hanford* Technical Services.
- If the well number is not listed, request a purgewater containment determination from WHC, *Hanford* Technical Services.

The designated person-in-charge at the site shall:

2. Use the safest (ALARA) feasible method for collecting and transferring purgewater to the tank truck.
3. Examine pumps, hoses, buckets, couplings, and other equipment to assure that leaks and spills of purgewater will be avoided when transferred to the tank truck.
4. Interface with ICF Kaiser Hanford, Transportation & Waste Handling, to schedule purgewater pick-up. Contact ICF Kaiser Hanford schedulers on 376-0971 for information.
5. Be knowledgeable of the historical and most recent analytical results from the source of purgewater extraction to assure spills and/or contact with the skin will be appropriately addressed.

Management/Supervision of purgewater truck drivers shall:

6. Arrange for orientation and training of the truck drivers in handling collected purgewater.

6.2 Purgewater Collection and Transport

The tank truck driver shall perform the following:

1. Park purgewater trucks and other vehicles downwind of groundwater sampling operations.
2. Transfer purgewater or raw water to the tank truck in a safe manner.
3. Record the volume (in liters or gallons, however, indicate which units are used) of purgewater or raw water collected on the Well Purgewater Transport Log (WPTL), BC-6000-453, and provide the total volume if numerous sites were visited prior to disposal.
4. Transport collected purgewater to the storage facility.
5. Notify East Tank Farms Operations (ETFO) two (2) hours prior to unloading collected purgewater at the storage facility. Call the Shift Office on 373-1600, 373-2689, or radio station 22 and the Tank Farm Surveillance Office at 373-2929.
6. Provide the ETFO operator, at the storage facility, with the original WPTL.

Purgewater Management

6.3 Discharge of Purgewater at the Storage Facility

The ETFO operator provides operations and surveillance services per POP TO-040-010.

6.4 Records Handling and Purgewater Database Tracking

The ETFO operator shall:

1. Verify the volume of all water (purgewater and raw water) inflow to the storage facility and document by signing and dating the WPTL.
2. Forward a copy of the WPTL to the Purge Water Activity Database operator.
3. Send the original of the WPTL to the ETFO Project Files.

The database operator shall:

4. Update the database upon receipt of the WPTL.
5. Maintain an electronic backup of the database. Persons with questions regarding the database may call 376-8596.

Records shall be retained as described in the following table. Responsibility for retention is as follows:

Well Purge Water Transport Log, WHC, ETFO
 Purge Water Activity Database, BHI

Name <small>Filing Unit Title or Description</small>	Record Type*	Retention Period	Disposal Authority	Cut-off and Retirement Instructions
Purge Water Activity Database. Registration #11357	R	TBD	TBD	Maintain as operational until no longer needed.
Well Purge Water Transport Log (BC-6000-453)	R	TBD	TBD	Transmit to File Custodian (FC) to retain in the Project File.

7.0 DESIGNATED REVIEWING ORGANIZATIONS

The organizations designated to review changes to this document are listed below. Comments from other reviewers are welcome, but are resolved at the originating organization's option.

Designated Reviewing Organizations

CMPOC

Hanford Technical Services, author
Tank Farms Transition Projects, Environmental Engineering

PSS/HTS
TFTP/EE

8.0 FORM

Well Purge Water Transport Log (BC-6000-453, Jetform).

9.0 REFERENCES

HSRCM-1, *Hanford Site Radiological Control Manual*.

WAC 173-303, "Dangerous Waste Regulations."

WHC-MR-0039, *Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington*, July 1990.

WHC-CM-1-5, *Standard Operating Practices*, Section 7.1, "Reporting Occurrences and Processing Operations Information."

WHC-CM-7-5, *Environmental Compliance*, Section 5.0, "Records, Reporting, and Response Activities."

WHC-CM-7-7, *Environmental Investigations and Site Characterization Manual*, EII 1.1, "Hazardous Waste Site Entry Requirements."

WHC-CM-7-8, *Environmental Engineering and Geotechnology Procedures*, Volume 4, Section 6.1, "Purgewater Collection Determination."

Tank Farm Plant Operating Procedure (POP), TO-040-010, *Perform Operations/Surveillance - Purgewater Storage Facility*.