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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 23, 2002

Mr. John Morse
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-13
Richland, Washington 99352

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EDMC

Dear Mr. Morse

Re: Test Plan for Hydrologic Field Tests During Fiscal Year 2002

The Washington State Department of Ecology (Ecology) recently reviewed the above referenced hydrologic test plan. The review indicated that needed hydrologic testing is being proposed to occur during the U.S. Department of Energy's fiscal year 2002. Ecology supports the proposed workscope. However, Ecology noted additional necessary workscope is neither acknowledged nor identified as potential future work. For example, workscope that could be used to support permit issuance (i.e., Low-Level Burial Ground waste management areas, etc.) or to address pending groundwater evaluation needs (i.e., Liquid Effluent Retention Facility, single-shell tank waste management areas contamination characterization, etc.) appears to be omitted. Ecology requests that regulators be invited to participate in the development of future workscope on hydrologic test plans starting with the fiscal year 2003 plan.

Ecology acknowledges the stated objective of the workscope as incrementally adding to the understanding of the hydraulic properties for the shallow unconfined aquifer system. Ecology also acknowledges the stated use of existing groundwater monitoring wells. However, the plan does not include promised testing designed to characterize groundwater contamination as Ecology has promoted during installation of new Resource Conservation and Recovery Act (RCRA) groundwater monitoring wells. Such characterization has been proposed by Ecology and is described by the draft Hanford Federal Facility Agreement and Consent Order Change Control Form for Milestone M-24-00N. Similarly, the plan does not include needed aquifer testing associated with some existing groundwater monitoring wells. To further explain, Ecology participated in collaborative negotiation of an "approvable" Liquid Effluent Retention Facility groundwater monitoring evaluation plan that included the need to evaluate aquifer continuity between wells 299-E26-11 and 299-E26-10. In addition, via the same plan, Ecology has communicated the standing need to evaluate the permeability of the upper basalt and possible hydraulic connection with the unconfined aquifer.

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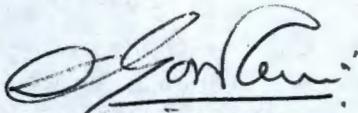
Ecology acknowledges the Pacific Northwest National Laboratory's internal process by which the workscope proposed in the *Test Plan For Hydrologic Field Tests During FY02* was selected. However, it should be noted that Ecology did not participate in the process by which the proposed workscope was selected. Ecology welcomes an invitation to participate in such processes in the future. Ecology believes that there is a need for a comprehensive identification of hydrologic testing needs for the Hanford Site.

Waste and purgewater management, as proposed in the *Test Plan For Hydrologic Field Tests During FY02*, will need to be amended. According to the "Strategy for Handling and Disposing of Purgewater at the Hanford Site, Washington" (1990), purgewater should be taken to the Purgewater Storage and Treatment Facility (ModuTanks). Regulatory agreement has not been reached on the management of this water in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) treatment train of the Effluent Treatment Facility. The solid wastes generated during the hydrologic testing will be managed in accordance with the approved Waste Control Plans for 200-ZP-1 and 200-UP-1. Ecology recommends that the Pacific Northwest National Laboratory verify that the existing work control plans have been updated to include the proposed activities. Lastly, a waste management plan should be developed for management of wastes generated at the 200-BP-5OU. This plan should be coordinated through the lead regulatory agency.

In summary, once the requested changes have been made to the waste management sections, Ecology is available to approve (by signature) the proposed *Test Plan For Hydrologic Field Tests During FY02*. However, Ecology would like to discuss some of the other issues addressed in this letter.

If you have any questions or comments about the above, please contact me at (509) 736-3015.

Sincerely,



Dib Goswami, Ph.D.
Senior Hydrogeologist
Nuclear Waste Program

ADH:JC:lkd

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Administrative Record: S-SX, T, TX-TY, U, A-AX, B-BX-BY, & C WMAs, LERF, LLBG