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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 27, 1999

Mr. Richard Holten
U.S. Department of Energy
P.O. Box 550, MSIN H0-12
Richland, Washington 99352



Re: Lack of funding for Milestone M-24 (RCRA Groundwater Monitoring Well Installation) and Sitewide Well Decommissioning

Dear Mr. Holten:

It is Ecology's understanding that well construction and decommissioning activities are not funded for Fiscal Year (FY) 2000 and beyond. FY 2000 groundwater monitoring well installation and well decommissioning activities are critical if the U.S. Department of Energy (USDOE) is to: (1) maintain technically defensible and compliant groundwater monitoring networks at Hanford, (2) protect the confined and semi-confined aquifers from further contamination, and (3) provide needed subsurface information on which to base risk assessments and cleanup, tank retrieval and closure decisions. Ecology and USDOE have previously discussed the importance of these issues. The ramifications of inadequate funding were thought to be well communicated, consequently, Ecology does not understand how USDOE has determined that these issues do not deserve funding. Ecology hereby advises USDOE that the current Multi-Year Work Plan (MYWP) funding profile is unacceptable.

Groundwater elevations throughout the Hanford Site are declining more quickly than anticipated. This has resulted in perturbations to groundwater flow and the inability of some monitoring wells to produce representative samples of groundwater. Thus, groundwater monitoring systems at Treatment, Storage and Disposal (TSD) facilities have, or are, becoming technically indefensible and non-compliant. Monitoring wells that comprise these systems also provide valuable information on the local hydrogeology, the distribution of contamination, transport mechanisms and aquifer properties.

Well decommissioning is extremely important since in large areas of the Hanford Site the hydraulic head in the upper unconfined aquifer is greater than the hydraulic head in the confined and semi-confined aquifers resulting in downward movement of groundwater. Many wells at Hanford were installed without annular seals and in some cases with

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perforated casings. Wells in these areas act as conduits by allowing contaminated groundwater to flow down through the annular space or the inside of the well casings with a resulting degradation of water quality in formerly pristine confined and semi-confined aquifers.

In view of the above it is critical that:

- USDOE procure adequate funding for the installation of groundwater monitoring wells at TSDs and the tank farms in fiscal year 2000 and beyond.
- USDOE, with the involvement of Ecology, develops a long-range master plan, that identifies groundwater monitoring needs at TSDs, and state permitted facilities throughout Hanford. USDOE should start this process as soon as possible with a targeted completion date of April 2000. This master plan will be evaluated and updated annually for accuracy.
- USDOE procure the funding to develop and implement a well abandonment program. This program must identify, prioritize and decommission wells that act as conduits for the contamination of the lower confined and semi-confined aquifers throughout the Hanford Site.

Please be advised that Ecology will consider enforcement actions if necessary, to ensure well construction and decommissioning requirements are funded by USDOE. Ecology requires a response to this letter that identifies USDOE actions to adequately fund these activities by October 15, 1999. If you have any questions please call Dib Goswami at (509) 736-3015 or Stan Leja at (509) 736-3046.

Sincerely,



Jane Hedges, Section Manager
Nuclear Waste Program

JH/SL:pkg

cc: Keith Klein, USDOE
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Administrative Record: Milestone M-24