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Richland Operations Office
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APR 9 2 1996



Mr. Steve M. Alexander
Perimeter Areas Section Manager
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336

Dear Mr. Alexander:

LETTER OF NOTIFICATION: EXCEEDANCE OF PH CRITICAL MEAN IN GROUNDWATER AT 100-D PONDS

This letter provides notification of the 100-D Ponds, a Resource Conservation and Recovery Act (RCRA) unit in the 100-D Area, may be affecting groundwater quality. Results from the February 1996 semiannual sampling and subsequent verification sampling indicate that field pH in well D8-6 exceeded the upper limit of the calculated critical range for pH.

The 100-D Ponds are subject to the requirements of 40 CFR 265 for an interim-status groundwater monitoring program. Sampling results from the first year of monitoring at the upgradient well were used to calculate background (critical mean) values in 1992. The indicator parameters, pH, conductivity, total organic carbon, and total organic halogen, are monitored semiannually. Data from downgradient wells are compared to the critical mean values (or critical range for pH) each time the network is sampled.

Field pH in downgradient wells D8-4 and D8-6 exceeded the upper limit of the critical range in February 1996. The wells were resampled for field pH in March 1996 to determine if the original results were valid. The verification sampling showed that well D8-4 was within the critical range for pH, but D8-6 exceeded the upper limit.

When one of the indicator parameters at a downgradient well exceeds the critical mean value, the following actions are required by the regulations:

...the owner or operator must provide written notice to the Regional Administrator--within seven days of the date of such confirmation... that the facility may be affecting ground-water quality. [40 CFR 265.93(d)(1)]

Within 15 days after the notification under paragraph (d)(1) of this section, the owner or operator must develop and submit to the Regional Administrator a specific plan... for a ground-water quality assessment program at the facility. [40 CFR 26.593(d)(2)]

Mr. Steve M. Alexander

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This letter satisfies the first requirement. A groundwater quality assessment plan is in preparation and will be transmitted within 15 days of your receipt of this letter to satisfy the second requirement.

If you have questions, please contact me on 373-9630.

Sincerely,



M. J. Furman, Project Manager
Groundwater Projects

cc: D. G. Horton, WHC
J. D. Williams, WHC