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Richland Operations Office
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Richland, Washington 99352

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DEPARTMENT OF ECOLOGY
NWP - RICHLAND

14-ESQ-0018

DEC 26 2013

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

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Dear Ms. Hedges:

TRANSMITTAL OF PROPOSED CLASS 2 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATIONS TO PERMIT CONDITIONS, PERMIT ATTACHMENTS 8 AND 10, AND GROUNDWATER MONITORING AT THE HANFORD FACILITY LIQUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY (LERF/ETF)

The U.S. Department of Energy Richland Operations Office (RL) as owner/operator and CH2M HILL Plateau Remediation Company (CHPRC) as the co-operator (hereinafter referred to as the Permittees) are proposing Class 2 modifications to the general permit conditions related to groundwater, deletion of Permit Attachment 10 (Purgewater Management Plan), revisions to Permit Attachment 8 (Well Maintenance and Inspection Plan) and to unit specific conditions and addendum of the LERF/ETF permit.

- 1) The Permittees are requesting a Class 2 modification determination per Washington Administrative Code (WAC) 173-303-830(4)(d)(i) for proposed changes to the general permit conditions related to groundwater (II.F). These changes are needed to update permit conditions to reflect proposed groundwater monitoring practices on site. The majority of the II.F conditions currently focus on well abandonment at Hanford; this process has been on-going over the years, is now completed and wells are compliant per permit conditions. Therefore, the Permittees have worked with State of Washington, Department of Ecology (Ecology) to develop conditions that focus on the well inspection, maintenance, and remediation of any wells that exist on site. These changes are justified as a Class 2 modification because they do not substantially alter the unit. The proposed changes are provided in red-line strikeout, and are outlined as follows for these updates:
 - Permit Condition II.F.1 is proposed to be marked as reserved. This proposal is due to the request # 2 listed below related to Permit Attachment 10, Purgewater Management Plan
 - Permit Condition II.F.2 is proposing changes as follows: a) updates to text to focus on well inspections, maintenance, rehabilitation and remediation, which focus the conditions on current regulatory requirements for maintaining a compliant RCRA

- monitoring network. Deletions to text are proposed related to well abandonment, which are outdated. Text is proposed to include inspection plans and schedules in Attachment 8, Hanford Well Maintenance Inspection Plan.
- Permit Condition II.F.d is proposed for update to reference new well installations and non-compliant wells to the schedule in the Hanford Federal Facility Agreement and Consent Order Milestone M-24, as amended, which is incorporated by reference in the permit.
- 2) The Permittees are requesting a Class 2 modification determination per WAC 173-303-830(4)(d)(i) to delete the Purgewater Management Plan (Permit Attachment 10). Permit Attachment 10 is proposed to be deleted from the permit, as it has been superseded by the Hanford Site Strategy for Management of Investigation Derived Waste (DOE/RL-2011-41, Revision 0), signed by U.S. Environmental Protection Agency and Ecology in April 2011. Purgewater at Hanford is now being managed under that plan, as discussed in Sections 6.2, 6.3, 6.4, and 6.5 of DOE/RL-2011-41, as appropriate. These changes are justified as a Class 2 modification because they do not substantially alter the unit, and are being proposed to respond to variations in the wastes managed under the permit.
- 3) The Permittees are requesting a Class 2 modification determination per WAC 173-303-830(4)(d)(i) to a complete modification of Permit Attachment 8, Hanford Well Inspection Maintenance Plan. The Permittees are proposing an entire replacement of the document, not specific section changes, therefore no red-line strikeout of the previous version is submitted in this request. These changes focus the Inspection and Maintenance Plan on current Hanford Site well maintenance practices, propose an updated schedule for well inspections, and outline well inspection criteria. These changes are justified as a Class 2 modification because they do not substantially alter the unit.
- 4) The Permittees are requesting a Class 2 modification per WAC 173-303-830(4)(b) to replace the current LERF-ETF Groundwater Monitoring Plan with an updated version of the document. The proposed changes for this permit modification fall under multiple categories listed WAC 173-303-830 Appendix I.C as Class 1 or 2 modifications, including Appendix I.C.1.a, I.C.1.2, and I.C.5.b; therefore, the Permittees are requesting the entire document be considered as a Class 2 permit modification. The Permittees are proposing an entire replacement of the document, not specific section changes, therefore no red-line strikeout of the previous version is submitted in this request. These changes involve the following:
- Aligns sample frequency to detection monitoring requirements (semi-annual)
 - Updates monitoring indicator parameters, including adding additional monitoring parameters
 - Updates the flow direction based on recent analytical data
 - Modifies the monitoring network to comply with current flow direction
 - Identified the need for an additional monitoring well (downgradient) based on updated groundwater flow direction around LERF-ETF

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5) The Permittees are requesting a Class 2 modification per WAC 173-303-830(4)(b) to propose groundwater monitoring conditions for LERF-ETF. The proposed changes for this permit modification fall under WAC 173-303-830 Appendix I.C.1.a, "Changes to wells that change the number, location, depth, or design of upgradient or downgradient wells of permitted groundwater monitoring system." The proposed conditions are provided in red-line strikeout, and outlined below:

- Requires compliance with Permit Addendum D, Groundwater Monitoring Plan for LERF-ETF
- Requires installation of a new downgradient well at LERF-ETF to comply with RCRA groundwater monitoring requirements. This new well is needed due to change in groundwater flow direction around LERF-ETF.
- Requires a future Class II modification when the new well is installed to update the Groundwater Monitoring Plan
- Requires a revision to the Liquid Effluent Retention Facility Characterization Report once the additional well is installed.

The notice required by the Permittees in WAC 173-303-830(4)(e)(ii)(C) will be included in the appropriate Hanford Federal Facility Agreement and Consent Order publication or list server, as described in Hanford Facility RCRA Permit Condition I.C.3.

If you have any questions, please contact me, or your staff may contact Stacy L. Charboneau, Assistant Manager for Safety and Environment on (509) 373-3841.

Sincerely,


Matt McCormick
Manager

ESQ:ACM

Enclosures

- 1 Groundwater Monitoring Plan for the Liquid Effluent Retention Facility
- 2 Part III, Operating Unit Group 3 Permit Conditions
- 3 Hanford Facility Resource Conservation and Recovery Act Permit Dangerous Waste Portion, Revision 8C
- 4 Hanford Well Maintenance and Inspection Plan

cc: See page 4

Ms. J. A. Hedges
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cc w/encls:

F. W. Bond, Ecology

S. Dahl, Ecology

Administrative Record, H6-08 (LERF/ETF TSD: S-2-8)

Ecology NWP Library (Hard Copy)

Environmental Portal, LMSI, A3-95 (CD ROM)

HF Operating Record (J. K. Perry, MSA, H7-28) (CD ROM)

cc w/o encls:

D. L. McDonald, Ecology

A. L. Prignano, Ecology

J. R. Seaver, CHPRC

R. R. Skinnarland, Ecology