Proposed Class 2 Permit Modification for Revision of Hanford Dangerous Waste Permit Attachment 8: “Training and Inspection Plan for Groundwater Monitoring Wells”

Duane Carter
Physical Scientist, Environmental
U.S. Department of Energy

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• The Hanford Dangerous Waste Permit establishes requirements to ensure that Resource Conservation and Recovery Act (RCRA) groundwater well activities protect human health and the environment

• Permit Attachment 8 includes inspection criteria for wells and training for personnel maintaining, inspecting and sampling the wells

• This proposed Class 2 permit modification, if issued, would add the following:
  o Additional detail for what is inspected at RCRA monitoring wells and when these inspections occur
  o Training for RCRA groundwater inspection, sampling and maintenance personnel
Permit Attachment 8 History

- Permit Attachment “Hanford Well Maintenance and Inspection Plan, BHI-01265” was first incorporated in the RCRA permit in 2000 to outline state requirements for well inspection and maintenance.
- Groundwater personnel training requirements were in unit group “Personnel Training” addenda.
- Well maintenance and inspection requirements were not specific and frequencies were not clear.
• RCRA applies to hazardous waste management at Hanford

• Washington State Department of Ecology (Ecology) administers the state’s RCRA program

• Ecology is the regulatory authority for the Hanford Site Dangerous Waste Permit, which includes Attachment 8

• The permittees and Ecology have determined that Attachment 8 should be revised
Proposed Permit Modification Overview

• Ecology and DOE participated in a series of facilitated workshops to determine which inspection criteria and personnel training should be included in the RCRA permit.

• The workshops resulted in the inclusion of 15 positions, along with their training requirements and inspections, that evaluate protection of human health and the environment.

• DOE is seeking approval from Ecology to incorporate the revised Attachment 8, “Training and Inspection Plan for Groundwater Monitoring Wells,” in the RCRA permit.

• As Ecology reviews this modification for completeness, it will determine what information should remain in the permit and what should be placed in the operating record.
Permit Modification Public Process

• What is the public being asked to comment on?
• Comment period open through March 13
• Submit comments via mail or electronically (preferred) to the Washington State Department of Ecology:

  Daina McFadden
  Washington State Department of Ecology
  3100 Port of Benton Boulevard
  Richland, WA 99354
  Electronically: http://nw.ecology.commentinput.com/?id=dhJmb

In compliance with Washington Administrative Code 173-303-803(3)(c)(vi), following the 60-day public comment period, Ecology will review and respond to comments before making its permitting decision.
Questions?
Backup Slides
• Hanford has four Resource Conservation and Recovery Act (RCRA) final status groundwater monitoring plans.

• Hanford has 18 RCRA interim status groundwater monitoring plans. These are planned to be included in RCRA permit.
• Permit chapters were revised to incorporate requirements for groundwater well inspections and groundwater personnel training

• The proposed modification includes revisions to the following conditions and chapters:
  o General Facility Condition II, condition II.F
  o Permit Attachment 8, “Training and Inspection Plan for Groundwater Monitoring Wells”
• General Facility Permit Condition II, condition II.F has been modified in the following ways:
  o II.F.1 – Addition of new permit condition stating requirements for inspections and training are located in Attachment 8
  o II.F.1 through II.F.3 – Existing condition numbers were renumbered to “II.F.2 through II.F.4” due to new permit condition II.F.1
  o II.F.3.a (previous permit condition II.F.2.b) – Removed the titles of Attachments 7 and 8 from the permit condition
  o II.F.3.c and II.F.4 (previous permit conditions II.F.2.d and II.F.3) – Regulation citation formatting was updated
Permit Attachment 8 has been modified in the following ways:

- Retitled Attachment 8 from “Hanford Well Maintenance and Inspection Plan” to “Training and Inspection Plan for Groundwater Monitoring Wells”
- Inspection Plan
  - Inspection schedule for aboveground portions of the RCRA monitoring wells
  - Inspection schedule for evaluation of well data for identification of possible well casing corrosion
- Personnel Training
  - Introductory and continuing training; job descriptions
  - Training on general facility, contingency plan, operations including maintenance and sampling