



THE HANFORD SITE

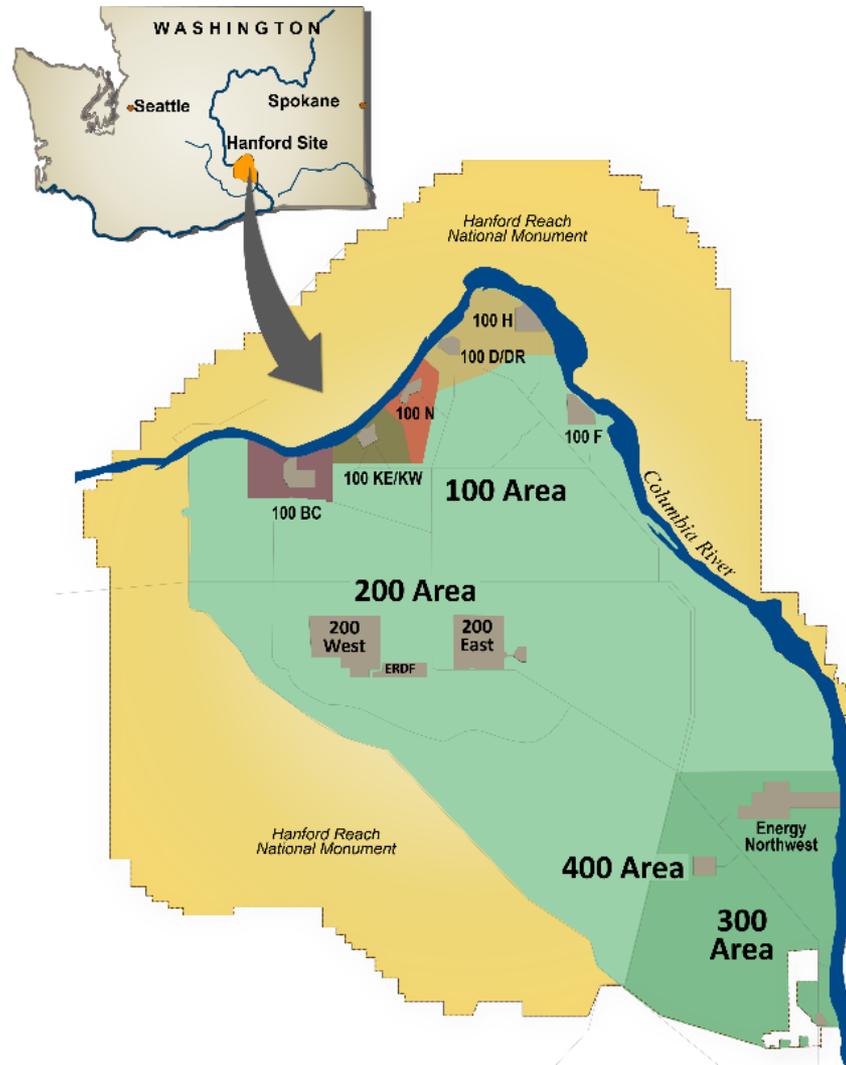
Proposed Class 2 Permit Modification for Revision of Hanford Dangerous Waste Permit Attachment 8: “Training and Inspection Plan for Groundwater Monitoring Wells”

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:
 - Additional detail for what is inspected at RCRA monitoring wells and when these inspections occur
 - Training for RCRA groundwater inspection, sampling and maintenance personnel

Hanford Site Map



- 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

Regulatory Framework for Permitting Action

- 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.

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The Hanford Reach
White Bluffs Overlooking the Columbia River

- 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:
 - General Facility Condition II, condition II.F
 - 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:
 - II.F.1 – Addition of new permit condition stating requirements for inspections and training are located in Attachment 8
 - 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
 - II.F.3.a (previous permit condition II.F.2.b) – Removed the titles of Attachments 7 and 8 from the permit condition
 - 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