

**300 AREA PROCESS TRENCHES
CHAPTER 8.0
POSTCLOSURE PLAN
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
06/30/2002	

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CHAPTER 8.0
POSTCLOSURE PLAN

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CHAPTER 8.0
POSTCLOSURE PLAN

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17
18
19
20
21
22

TABLE OF CONTENTS

8.0 POSTCLOSURE PLAN 5

8.1 Inspection Plan..... 5

8.1.1 Security Control Devices 5

8.1.2 Well Condition..... 5

8.2 Maintenance Plan..... 5

8.2.1 Repair of Security Control Devices 5

8.2.2 Well Replacement..... 5

8.3 Personnel Training 5

8.3.1 Outline of the Training Program..... 6

8.3.2 Job Description 6

8.3.3 Training Content, Frequency, and Techniques 6

8.3.4 Training for Emergency Response..... 6

8.3.5 Implementation of Training Program 7

TABLE

Table 8.1. Inspection Schedule for the 300 Area Process Trenches 7

1
2
3
4

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1 **8.0 POSTCLOSURE PLAN**

2 **8.1 Inspection Plan**

3 This section describes compliance monitoring activities, security equipment, and inspections for well
4 conditions during a period of modified closure compliance monitoring. Table 8.1 lists the inspection
5 items and the inspection frequency for the postclosure care period. These inspections may be
6 implemented in checklist form. Such a checklist could specify entering checklist performance and results
7 in the appropriate inspection logbook.

8 **8.1.1 Security Control Devices**

9 Each of the groundwater monitoring wells has a locked cap to prevent unauthorized access and is
10 surrounded by four steel guard posts for visibility to prevent damage from vehicles. The overall well
11 condition, locks, guard posts, and pumps will be inspected during each sampling event. Problems and/or
12 damage will be noted on well inspection forms for tracking of repairs.

13 **8.1.2 Well Condition**

14 Inspection of groundwater monitoring wells will be conducted pursuant to Permit Condition II.F and
15 carried out under internal procedure BHI-EE-01 (BHI 1995) or equivalent guidance. This procedure calls
16 for a surface inspection of a well at each sampling event. The procedure also calls for a subsurface
17 inspection of the well at a minimum of every 3 to 5 years. This routine subsurface inspection may consist
18 of pulling and inspecting the pump, brushing the inner walls of the casing and screen, and conducting a
19 down-hole television survey.

20 **8.2 Maintenance Plan**

21 This section provides a plan for maintenance of the unit during the compliance monitoring period
22 required for modified closure. Elements of this maintenance plan include repair of security devices, and
23 well replacement. The maintenance plan is based on observations made and recorded in the well
24 inspection form during site inspections. Except where immediate action is required, maintenance action
25 will be initiated within 90 days of inspection and discovery.

26 **8.2.1 Repair of Security Control Devices**

27 The responsible maintenance organization will be notified of any problems to the well locks or guard
28 posts and/or problems noted in the well inspection form during inspections and/or well monitoring
29 activities. Well repairs will be made as soon as possible after notification of damage. Repairs to the four
30 steel guard posts at each monitoring well will be made before the following inspection period and tracked
31 on well inspection forms to completion.

32 **8.2.2 Well Replacement**

33 Maintenance of groundwater monitoring wells will be carried out under internal procedure BHI-EE-01
34 (BHI 1995) or equivalent guidance. This procedure covers correction of problems found during routine
35 inspection or that manifest themselves at other times. If field maintenance procedures are inadequate to
36 solve problems identified during site inspection, management will decide whether to repair or replace the
37 well.

38 Where monitoring well damage requires modification of the groundwater monitoring program, the
39 monitoring plan will be amended in accordance with WAC 173-303-610(8)(d).

40 **8.3 Personnel Training**

41 This section describes the training of personnel required to maintain the 300 APT in a safe and secure
42 manner during postclosure care as required by 40 CFR 265.16, WAC 173-303-330, and Permit
43 Condition II.C of the Hanford Facility Dangerous Waste Permit.

1 **8.3.1 Outline of the Training Program**

2 This section outlines the introductory and continuing training programs necessary to conduct the
3 postclosure activities at the 300 APT in a safe manner. This section also includes a brief description of
4 how training will be designed to meet job tasks as required in 40 CFR 265.16(a).

5 **Surveillance Personnel:** The following outline provides information on classroom and on-the-job
6 training that surveillance personnel will complete before conducting independent site surveillance at the
7 300 APT:

- 8 • Security inspections.
- 9 • Location, integrity, and inspection of groundwater wells.

10 **8.3.2 Job Description**

11 This section provides the job description(s) for postclosure activities at 300 APT as required by
12 40 CFR 265.16(d)(1) and WAC 173-303-330(2)(a).

13 **Site Surveillance:** Personnel with training in the following areas will conduct the inspections:

- 14 • Control devices
- 15 • Damage

16 **8.3.3 Training Content, Frequency, and Techniques**

17 The training of personnel requires the following job-specific training areas, as appropriate.

- 18 • **Emergency Preparedness Training:** This training will include a review of emergency
19 procedures that consists of listening to standard emergency signals, and reporting procedures.
- 20 • **The Resource Conservation and Recovery Act (RCRA) Groundwater Monitoring Scope,
21 Organization, and Quality Assurance Plan:** This training will include the documentation
22 requirements included in the chain of custody to the laboratory, how to correct mistakes made on
23 field data sheets, and any applicable manifests or shipping orders required for shipping samples to
24 the laboratory.
- 25 • **Groundwater Field Sampling Procedures:** This training will include pump description and
26 operation of the three types of pumps (used by the field personnel), operational procedures for the
27 generators and the pumps used to gather groundwater samples, and special requirements for
28 collecting and packaging samples containing volatile organic materials that require acid
29 preservatives or special filtering. Training also will be given in the areas of field data record
30 preparation and chain of custody to the laboratory.
- 31 • **Site Security Inspections:** Personnel will be instructed on how to inspect for obvious signs of a
32 security breach. Signs may include downed barricades.
- 33 • **Location, Integrity, and Inspection of Groundwater Wells:** Personnel will be shown the
34 locations of the groundwater wells and instructed on how to inspect the cap and casing of each
35 well to ensure that it is locked.

36 **8.3.4 Training for Emergency Response**

37 This section will demonstrate that personnel conducting postclosure activities at the 300 APT have been
38 fully trained to respond effectively to emergencies and are familiar with emergency procedures and
39 equipment. In addition, hazardous waste site operation training will be provided in accordance with
40 29 CFR 1910.120.

- 41 • **Response to Fires:** The 300 APT will have no existing structures and may be covered with a soil
42 cover. As such, there is no need for fire equipment. However, if personnel are at the unit when a
43 brushfire breaks out, they will notify the Hanford Fire Department.

- 1 • **Response to Groundwater Contamination:** Based on the current groundwater monitoring
2 program, groundwater contamination beneath the 300 APT does not constitute an emergency
3 situation, nor will it become so as a result of closure. Therefore, emergency response training in
4 this regard is not warranted at this time.

5 **8.3.5 Implementation of Training Program**

6 Surveillance personnel will undergo the required training programs outlined in Section 8.5.1 as they
7 pertain to monitoring requirements. Surveillance personnel will not be allowed to perform inspections at
8 the 300 APT until the required training programs have been completed.

Table 8.1. Inspection Schedule for the 300 Area Process Trenches

Inspection item	Inspection frequency
Security control devices: well caps, and locks	Quarterly
Well condition	Semiannually
Subsurface well condition	3 to 5 years

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