

0064441

Meeting Minutes Transmittal/Approval
Unit Managers' Meeting
200 Area Groundwater and Source Operable Units
1200 Jadwin Avenue, Richland, Washington
November 18, 2004

APPROVAL: *Larry Romine* Date: 12-21-04
Larry Romine, 200 Area Unit Manager, DOE/RL

APPROVAL: *Briant Charboneau* Date: 12/21/04
Briant Charboneau, Groundwater Unit Manager, DOE/RL

APPROVAL: *Craig Cameron* Date: 3/22/05
Craig Cameron, 200 Area Unit Manager, EPA

APPROVAL: *John B. Price* Date: 4/1/05
John Price, 200 Area Unit Manager, Ecology

RECEIVED
APR 14 2005

EDMC

UNIT MANAGERS' STATUS MEETING MINUTES
1200 Jadwin/Rm 1-C1
November 18, 2004

9:00 – 10:30 a.m.

Issues Resolution Meeting

- Review of Issues Table from October UMM
- General Discussion Topics

Table of Issues: 11/18/04

IAMIT	UMM	ISSUES	AGREEMENTS	FOLLOW- ON ACTION	LESSONS LEARNED
X		ROD Strategy A meeting was held on Nov. 17 between DOE and agencies. DOE requested to add in Groundwater RODs	This issue will be tracked in UMM but resolution is currently at IAMIT level.	Monthly status until agreement reached. EPA/Ecology sending letter on priority of responding to their email proposals. Plan on for all OUs.	
	X	RCRA/CERCLA Integration	200-UW-1 waste sites should be used as example <ul style="list-style-type: none"> • Issue will carry until December/ January • Craig/Kevin/ John to discuss further 	January – EPA /Ecology/RL. Status. Captured process in lessons learned.	
	X	COPCs- o Ecology would like to talk about COPCs analysis by method, and analytical report.		FH compiling information on costs from laboratories and laboratory data. Ecology has information and proposed a global closeout. Ecology to report on Tank Farms Method	
		Ecological Risk Assessment o Ecology identified this activity to be on the critical path for completing the M-15-00C milestone, will it be fully funded in FY 05-06 (including the FY 04 deferred scope)?		o	

		<p>UMM Meeting Minutes</p> <ul style="list-style-type: none"> Meeting minutes must be completed and up-to-date to be in compliance with the TPA 	<p>November minutes a priority to have finalized with goal of staying current from this point forward.</p> <p>Continue to work on back-log of meeting minutes.</p>	<p>FH will try to find someone to assign to supporting meeting minutes</p>	
--	--	--	--	--	--

IAMIT	UMM	CLOSED ISSUES	AGREEMENTS	FOLLOW- ON ACTION	LESSONS LEARNED
	X	RCRA/CERCLA Integration	CLOSED 11/18/04	Regular meetings on Thursdays to address SW-2 specific issues	Elevate issues early. Don't drag out.
	X	<p>U Plant Area –</p> <ol style="list-style-type: none"> Ecology requested target milestones for U Plant pipelines. Would like to have EE/CA by March 31, 2005 Ecology recommending enforceable milestones if target milestones not acceptable. Need to consider HAB advice of 10 September 	<p>This issue will be tracked through IS-1 Work Plan</p> <p>CLOSED 11/18/04</p>	<p>Ecology is looking for a treatability investigation in IS-1 for pipelines and target milestones.</p> <p>Should include ORP in discussions prior to going to enforceable milestones.</p> <p>Discuss due date for Tri-Party response to HAB advice.</p>	
	X	<p>200-CW-1</p> <ul style="list-style-type: none"> Originally identified as a "shrink the site" priority, does this priority still exist? Is the FS going to be finished this year? 	CLOSED 11/18/04	o	
	X	<p>200-CS-1</p> <ul style="list-style-type: none"> Will DOE submit a TPA change request to add 200-CS-1 sites to 200-CW-1 and 200-CW-5 (and thus to those OU's FS/PPs)? Can the cost savings that result (an FS/PP would not be required for 200-CS-1), go to eco risk assessment sampling? 	<p>CLOSED 11/18/04</p> <p>Merge CW-1 and CW-5 into a single FS</p> <p>Include CS-1</p> <p>TPA Milestones will be maintained</p>	o Mary to set up a meeting with John Price to discuss how to format the FS to include RCRA closure – also invite EPA	
		<p>Ecological Risk Assessment</p> <ul style="list-style-type: none"> Ecology identified this activity to be on the critical path for completing the M-15-00C milestone, will it be fully funded in FY 05-06 (including the FY 04 deferred scope)? 	<p>CLOSED 11/18/04</p> <p>RL agrees that this is a priority and is preparing full funding.</p>	<p>Ecology will wait to see if work is completed.</p> <p>Ecology requests early notification if not funded.</p>	Communicate clearly, early, and frequently.
		<p>Tc-99 Treatability Integrated Effort</p> <ul style="list-style-type: none"> A joint Ecology/EPA letter is being drafted to identify the need to integrate ORP and RL efforts on Tc-99 treatability studies 		Agencies will look for an official response	
	X	Points of calculation	CLOSED 8/24/04 EPA and Ecology committed to strive for	None	N/A

			consistency.		
	X	IS-1 OU –RL/ORP Agreements on scope (pipeline) by Oct 2004, clear delineation of sites, TSD vs. RPP status	CLOSED 8/24/04 - RL/ORP in process of addressing issues raised by Ecology.	RL requested that the regulatory agencies help resolve issues on RCRA/CERCLA integration.	N/A
		Informal transmittal of docs	CLOSED 8/24/04	None	N/A
	X	Ecology is concerned with the delay of the FY04 Eco sampling and potential impacts to RI/FS Process.	CLOSED 8/24/04	None	Early notification & discussions w/regulatory agencies would alleviate many issues/ concerns.

10:45 a.m. – 12:00pm

General (7 minutes)

A decision was made to change the starting time for the Status Meeting to 10am from this point forward. The goal is to have the status meeting completed by 11:30am.

- Outstanding Action Items
- Open for Regulatory Topics or Action Items

GROUNDWATER OPERABLE UNITS

General (7 minutes)

200-BP-5 & 200-PO-1 OUs (2 minutes)

- Sampling and Analysis Plans status

200-UP-1 OU (2 minutes)

- Average Pumping Rate (counting all outage time as 0 gpm) for January 26 through October 10 is approximately 51.1 gpm.
- From August 23 through September 30, the system operated between 46.7 and 51.3 gpm.
- The system was shutdown for 7 hours August 26 and 7.5 hours on September 28 for an ERDF leachate transfer. Extraction well 299-W19-39 shutdown for approximately 5 hours on September 19 due to low water level.
- System Run Time
 - For August 23 through September 30 98.4%
 - FY2004 (Year to date) 91.9%
 - System Inception to date 92.5%

- RI/FS Work Plan Draft B – We will be holding a 4th meeting with Ecology in the next week or so to fully address well completion and well network comments.
- Need Ecology status on their review of the 200-UP-1 Operating Plan for a rebound study.
- Important Milestones:
 - July 12, 2005 – G2U40195, DOE-RL submits Draft A RI Report to Regulators
 - April 5, 2007 – G2U54160, Issue Draft A FS Report to Regulators
- New monitoring well “P” and “R” are currently being constructed (see attached map). Drilling of new well “K” has started (~100 ft below ground surface). These wells were scheduled to installed last spring, but encountered drilling delays.
- Work on the RI Report was scheduled to re-start October 1, but due to drilling delays, data from these wells will not be available until early December.

In a discussion regarding the rebound study a request was made to having something formal (in writing) that states that a review of the data will be completed during the 12 months the system is shut down. The concern is how long will the system stay shut down and if there is any guarantee that the data has been reviewed. A formal document should state under what conditions the system will be restarted and specify when the system will be restarted if needed.

200-ZP-1 OU (2 minutes)

- Average Pumping Rate for FY04 through September 30: 142 gpm
- From August 23 through September 30, the system operated at 205 gpm.
- System was shutdown for a short period on August 27 and 30 due to broken gas analyzer. System was shutdown for 2 hours on September 20 for a GAC change-out.
- System Run Time
 - For August 23 through September 30 93.4%
 - FY2004 (Year to date) 95.6%
 - System Inception to date 92.6%
- Regarding ZP-1 pump-and-treat expansion:
 - Design work started October 1 as scheduled.
 - Next week we will be re-looking at the implementation schedule to see if we can speed-up the schedule for getting new extraction wells online.
 - After getting concurrence from Brenda Becker-Khaleel, DOE-RL is in the process of issuing a letter to Ecology noting that we will be using single-walled above-ground piping for the ZP-1 expansion combined with daily inspections. This is consistent with WAC 173-303-640 (4) (f).

200-PW-1 (200-ZP-2):

- Average Air Flow Rate for August 23 through September 30: 336 CFM
- System was shutdown week of September 30 to relocate to vicinity of Z-9
- Active system will be shutdown November 1, 2004
- The passive system remains operational

- DOE-RL and EPA concurred on the Carbon Tetrachloride Expedited Response Action (200-PW-1 Operable Unit) Soil Vapor Monitoring Plan for November 2004 Through March 2005 on 11/9. The plan is provided as an attachment to these minutes.
- The October monthly monitoring of nonoperational wells and probes was completed, but the data are not yet available. The data will be provided at the next UMM.

SOURCE OPERABLE UNITS

200-UW-1 OU

- RL plans to informally submit the 200-UW-1 Focused Feasibility Study/Proposed Plan, Draft C to Ecology and EPA on September 30, 2004.
- FH/RL conducted a surface barrier performance monitoring workshop on October 21-22, 2004. The workshop was attended by RL, FH, CH2M Hill, Ecology, and EPA as well as FH's surface barrier experts.

200-PW-1, 200-PW-3, & 200-PW-6 OUs (3 minutes)

- Schedule Review
 - Status of Field Work Preparation and Planning. As part of the Step I dispersed carbon tetrachloride vadose zone plume investigation in 2002, 8 temporary monitoring probes were installed to confirm the initial results. These probes were monitored over a 2 year period. DOE-RL and EPA concurred that the objective of monitoring these temporary probes has been met and that additional monitoring in support of the remedial investigation is not needed.
 - Status of Field Work at 216-Z-9. The borehole reached the Ringold Lower Mud unit at 396 ft below ground surface on 11/17. The maximum carbon tetrachloride groundwater concentration, based on field screening, was approximately 3700 ppb at 55 ft below the water table.
 - Status of Carbon Tetrachloride DNAPL Investigation. Vista Engineering conducted a passive soil gas survey in the vicinity of the 216-Z-1A tile field and the Plutonium Finishing Plant from 11/11-11/16.

200-CW-1 & 200-CW-3 OUs (1 minutes)

- Schedule Review
 - Status of FS and PP

200-PW-2 & 200-PW-4 OUs (3 minutes)

- Schedule Review
 - Status of RI Report
 - Status of Field Work for 216-S-7 Borehole

A question arose as to when the official transmittal of draft dispositions to Ecology's comments

on the RI report are due. RL stated that official comments will be transmitted by the end of the month. An electronic informal transmittal occurred on November 15. A comment disposition meeting is scheduled for December 10.

Drilling at the 216-S-7 Crib was initiated on November 8. As of November 17 the borehole had been advanced to 44 ft. Ecology (John Price) asked that daily drilling reports for the work at the 216-S-7 crib be sent to Jennie Stults.

200-CS-1 OU (1 minutes)

- Schedule Review
 - Status of RI Report

200-CW-5, CW-2, CW-4, & SC-1 OUs (1 minutes)

- Schedule Review
 - Status of Work Plan
 - Status of RI Report
 - Status of FS and PP

EPA commented that DOE is looking to remove specific procedure numbers from documents to avoid hassles with revising documents every time a procedure number is changed. EPA expressed concern that documents may become too vague since they review the procedures mentioned when reviewing documents. It was suggested that at the very least a description of the type of procedure used must be included.

200 Area Ecological Evaluation (3 minutes)

- Schedule Review
 - Status of Eco DQO
 - Status of Eco Evaluation Report
- Overview of Eco Activities
 - Spring Sampling Progress
 - Status of the FY04 Sampling

FH reported that there is additional sampling being planned. FH will contact Ecology to go over a conceptual model in the near future.

200-IS-1 & 200-ST-1 (2 minutes)

- Schedule Review
 - Status of Work Plan

The Work Plan is currently out for DOE-RL review. A few items need to be resolved such as the fact that the document contains some Official Use Only (OUO) information OUO map plates. Map plates may go as a separate document with a reference to them in the document. Ecology

agreed that Part A permits in Appendix A could instead be included by reference or that coordinates could be "white-outed".

FH reported that the 241CX tank system letter came out.

200-LW-1/200-LW-2 (1 minutes)

- Status of Field Work

200-MW-1 (1 minutes)

- Status of Field Work

200-UR-1 (2 minutes)

- Schedule Review
 - Status of DQO and Work Plan
 - Action Memo (15 sites)

RL officially transmitted their responses to Ecology's comments, which according to John Price, were received on 10/12/04. FH has operated with the understanding that the TPA gives 45 days to issue a document after resolution of comments. In addition, a 60-day extension was requested. Therefore, it was expected that the new issue date for the work plan would be 105 days after the date on which Ecology officially answered the RL letter of response to Ecology's Draft A comments.

Ecology disagreed, because in their opinion, RL failed to meet their schedule commitment to respond to the Ecology comments. The RL letter was approximately two months late, putting the work plan beyond the TPA requirements. Therefore, Ecology proposed requiring the Rev 0 work plan to be issued within 30 days.

FH responded that it would be impossible to issue the work plan within 30 days, given the scope of the revisions and the impact of the holidays on the availability of FH and contractor staff.

Ecology requested that RL and FH propose a reasonable date for submittal of the work plan, and that that date needs to be documented as the new commitment date. Ecology also warned that they intend to issue letters of violation if the date is not met.

200-SW-1/2 (4 minutes)

- Schedule Review
 - Ecology update on facilitator subcontract. Ecology is finalizing the subcontract to hire a facilitator for the upcoming discussions between Ecology and DOE-RL. Ecology will schedule the meetings to reserve dates and times.
 - Status of DQO and Work Plan
 - Treatability Test Plan. FH developed the draft outline and requested that the three subcontractor teams provide input for the Treatability Test Plan.
 - Other

Meeting minutes are attached. Minutes are comprised of the following:

- Attachment 1 -- Agenda
- Attachment 2 -- Attendance Record
- Attachment 3 -- Unit Managers Status Meeting Agenda
- Attachment 4 -- Open Action Items & Tracking
- Attachment 5 -- 200 Area Remedial Action Float Table
- Attachment 6 -- Table A-2 Decommissioning Well List
- Attachment 7 -- Attachment 3B – 200-PO-1 Operable Unit
Groundwater Well Decommissioning List
- Attachment 8 -- Ecology Points of Contact (Updated 11-17-04)
- Attachment 9 -- Approval of the Carbon Tetrachloride Expedited
Response Action (200-PW-1 Operable Unit) Soil
Vapor Monitoring Plan for November 2004
Through March 2005

UNIT MANAGERS' ISSUES MEETING AGENDA

1200 Jadwin/Rm 1-C1

November 18, 2004

9:00 – 10:30 a.m.

Issues Resolution Meeting

- Review of Issues Table from August UMM
- General Discussion Topics

Table of Issues: 10/21/04

IAMIT	UMM	ISSUES	AGREEMENTS	FOLLOW- ON ACTION	LESSONS LEARNED
X		Strategy	This issue will be tracked in UMM but resolution is currently at IAMIT level.	Monthly status until agreement reached. EPA/Ecology sending letter on priority of responding to their email proposals. Plan on for all OUs.	
	X	RCRA/CERCLA Integration	CDI should be used as example	October – EPA Status. Captured process in lessons learned.	
X	X	<ul style="list-style-type: none"> • SW-2 OU – Ecology requested task-level schedule and float in accordance with TPA. • Ecology will use task-level schedule to evaluate whether RL can meet 12/31/2008 milestones to complete RI/FS. 		<ul style="list-style-type: none"> • RL response to Ecology letter due by 9/17. FH staff have been reviewing the INEL WAG7 info. 	
		<ul style="list-style-type: none"> o Ecology would like to talk about COPCs, analyses by method, and analytical report. Beth Rochette will discuss the issue on behalf of Ecology. 			
		<ul style="list-style-type: none"> o Ecology requested target milestones for U Plant pipelines. Would like to have EE/CA by March 31, 2005. o RL deferred agreement until this UMM, to evaluate baseline data. o Ecology recommending enforceable milestones if target milestones not acceptable. o Need to consider HAB advice of 10 September. 		<ul style="list-style-type: none"> o RL to respond at Oct. UMM. o Should include ORP in discussions prior to going to enforceable milestones. o Discuss due date for Tri-Party response to HAB advice. 	
		200-CW-1 <ul style="list-style-type: none"> • Originally identified as a "shrink the site" priority, does this priority still exist? • Is the FS going to be finished this year? 		o	
		200-CS-1 <ul style="list-style-type: none"> • Will DOE submit a TPA change request to add 200-CS-1 sites to 200-CW-1 and 200-CW-5 (and thus to those OU's FS/PPs)? • Can the cost savings that result (an FS/PP would not be required for 200-CS-1), go to eco risk assessment 		o	

		sampling?			
		200-CW-5 <ul style="list-style-type: none"> Additional "realistic" alternatives need to be considered in the FS TRU waste should be dealt with globally and not on a case-by-case basis 		o	
		Ecological Risk Assessment <ul style="list-style-type: none"> Ecology identified this activity to be on the critical path for completing the M-15-00C milestone, will it be fully funded in FY 05-06 (including the FY 04 deferred scope)? 		o	
		UMM Meeting Minutes <ul style="list-style-type: none"> Meeting minutes must be completed and up-to-date to be in compliance with the TPA 		o	
		Tc-99 Treatability Integrated Effort <ul style="list-style-type: none"> A joint Ecology/EPA letter is being drafted to identify the need to integrate ORP and RL efforts on Tc-99 treatability studies 		o	

IAMIT	UMM	CLOSED ISSUES	AGREEMENTS	FOLLOW-ON ACTION	LESSONS LEARNED
	X	Points of calculation	CLOSED 8/24/04 EPA and Ecology committed to strive for consistency	None	N/A
	X	IS-1 OU-RL/ORP Agreements on scope (pipeline) by Oct 2004, clear delineation of sites, TSD vs. TRP status	CLOSED 8/24/04 RL/ORP in process of addressing issues raised by Ecology	Re-requested that the regulatory agencies help resolve issues on RCRA/CERCLA integration	N/A
		Informal transmittal of docs	CLOSED 8/24/04	None	N/A
	X	Ecology is concerned with the delay of the FY04 Eco sampling and potential impacts to RI/FS Process	CLOSED 8/24/04	None	Early notification & discussions w/regulatory agencies would alleviate many issues/concerns.

**200 Area Unit Managers Status Meeting
November 18, 2004**

Please print clearly and use black ink

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
Jon Perry	FH-EP		326-4791
Lanny Dusek	FH-D&D		438-1756
Ron Jackson	FH-DED	U-plant	373-3599
Dennis Faldon	EPF		
John Price	Ecology		
Bryan Tracy	DOE-RL	200 Area Waste Site	376-7087
MARY TODD ROBERTSON	FH	200 AREA waste Site Remediation	373-3920
MIKE HICKEY	FH	WASTE SITE LEAD	373.3092
Virginia Rohay	FH	PW-1 SW-2	373-3803
Jennie Stults	Ecology	OU Lead	372-7956
Alicia Hamer	Ecology	216-M-12 200 CS-1	372-7904
Mark Byrns	FH	Task Lead	373-3996
Craig Cameron	EPA		
Arturo Tortoso	DOE	200-Area GW um	373-9631
Larry Remme	DOF	Waste Site & Facilities	376-4747
Stewart Luttrell	PUNL	Groundwater	376-6023
Brent Charbonneau	DOE	GW UM	373-6137
Bruce Ford	FH	Groundwater	373-3809

UNIT MANAGERS' STATUS MEETING AGENDA

1200 Jadwin/Rm 1-C1
November 18, 2004

10:45 a.m. – 12:00pm

General (7 minutes)

- Outstanding Action Items
- Open for Regulatory Topics or Action Items

GROUNDWATER OPERABLE UNITS

General (7 minutes)

200-BP-5 & 200-PO-1 OUs (2 minutes)

- Sampling and Analysis Plans status

200-UP-1 OU (2 minutes)

- Remediation Treatment Status
- RI/FS Work Plan Status – Received Ecology comments 9/3
- Status of New Wells, “P,” “K,” and “R”
- Update on Rebound Study

200-ZP-1 OU (2 minutes)

- Remediation Treatment Status
- RI/FS Work Plan Status – Issued
- Update on Expanding P&T System to North
- Approval to Use Single Wall Discharge Line (P&T Expansion)

200-PW-1, 200-ZP-2 OU (2 minutes)

- Remediation Treatment Status
- Monthly Monitoring
- Monitoring Plan for Nov 04 – Mar 05

SOURCE OPERABLE UNITS

U Plant Area (3 minutes)

- 200-UW-1 Waste Sites

- Pipeline EE/CA and AM
- Ancillary Facilities
- 221-U Canyon Disposition Initiative

BC Cribs Area Closure (2 minutes)

- Schedule Review
 - FFS/PP status

200-TW-2 & 200-PW-5 (1 minutes)

- Schedule Review
 - Status of RI Report
 - Status of FS and PP

200-PW-1, 200-PW-3, & 200-PW-6 OUs (3 minutes)

- Schedule Review
 - Status of Field Work Preparation and Planning
 - Status of Field Work at 216-Z-9
 - Status of Carbon Tetrachloride DNAPL Investigation

200-CW-1 & 200-CW-3 OUs (1 minutes)

- Schedule Review
 - Status of FS and PP

200-PW-2 & 200-PW-4 OUs (3 minutes)

- Schedule Review
 - Status of RI Report
 - Status of Field Planning for 216-S-7 Borehole

200-CS-1 OU (1 minutes)

- Schedule Review
 - Status of RI Report

200-CW-5, CW-2, CW-4, & SC-1 OUs (1 minutes)

- Schedule Review
 - Status of Work Plan
 - Status of RI Report
 - Status of FS and PP

200 Area Ecological Evaluation (3 minutes)

- Schedule Review
 - Status of Eco DQO
 - Status of Eco Evaluation Report
- Overview of Eco Activities
 - Spring Sampling Progress
 - Status of the FY04 Sampling

200-IS-1 & 200-ST-1 (2 minutes)

- Schedule Review
 - Status of Work Plan

200-LW-1/200-LW-2 (1 minutes)

- Status of Field Work

200-MW-1 (1 minutes)

- Status of Field Work

200-UR-1 (2 minutes)

- Schedule Review
 - Status of DQO and Work Plan
 - Action Memo (15 sites)

200-SW-1/2 (4 minutes)

- Schedule Review
 - Ecology update on facilitator subcontract
 - Status of DQO and Work Plan
 - Treatability Test Plan
 - Other

**200 Area Unit Managers' Meeting
OPEN ACTION ITEMS & TRACKING**

Action #	Action/Subject	Assigned To	Owed To	Assigned Date	Original Due Date	Adjusted Due Date	Date Complete	Status
34	Provide a clear definition of "Central Plateau"	RL	EPA&Ecology	10/16/03				Complete 9/15/04
35	Ecology reviewing Draft Operating Plan for Rebound Study-Price will get back to Tortoso w/Date.	Ecology		07/15/04				has been completed; comments were received from Ecology on November 10, 2004.
36	Review Modeling lessons learned from TW-1 for applicability to other Ous. Make best of data we have. Larry: Follow-on meeting.	Benecke						A formal fix is in progress. RL/EPA & Ecology met to collect input to address regulatory agency concerns. J. Morse to provide summary @ Nov. UMM
37	Foley suggests Larry/Mike to talk to Bill McMahan. Dual porosity not done. Ecology agreed it is not acceptable. Opportunity to use dual porosity to help guide that.	FH	RL	09/16/04				
38	All agencies to provide written notification and who is designee when unable to attend.							
39	Assignment of POC listing for RL Leads to be made available to FH.	J Stults						Completed. Will be handed out at November UMM

**200 Area Unit Managers' Meeting
200 Area Remedial Action Float Table
November 2004**

Task	Scheduled Date	Float	Comments
200-CS-1			
Deliver Draft A FS/PP for Regulatory Agency Review	11/30/2005	--	On schedule
200-CW-1			
Deliver Draft B FS for Regulatory Agency Review	7/3/2003 (original date based on receipt of regulatory agency comments 45 calendar days after submittal (which would be 5/15/2003) with 45 days to revise and reissue)	-435-d	Regulatory agency comments originally due on 5/15/2003; policy level comments received on that date; Ecology indicated additional comments would be coming; additional informal comments were received on 6/25/2004
	01/30/05(new target date based on collecting spring samples and incorporating data into the revision)	--	Schedule revised due to delays at analytical laboratory. New schedule delivery due to funding shortfalls for FY05
200-LW-1			
Deliver Draft A RI Report for Regulatory Agency Review	10/31/2005	--	On schedule
200-PW-2			
Ecology approve Rev 1 RI/FS work plan	2/14/2003	--	Work Plan approved
Deliver Draft A RI Report for Regulatory Agency Review	6/30/2004	--	Comments received 10/19/04. Responses due to Ecology 11/19/04
Deliver Draft	12/31/2005	--	On schedule

**200 Area Unit Managers' Meeting
200 Area Remedial Action Float Table
November 2004**

Task	Scheduled Date	Float	Comments
A FS/PP for Regulatory Agency Review			
200-SW-1/200-SW-2			
Brief Ecology on DQO Approach	7/8/2004	--	Initial briefing conducted on 7/8/04. A subsequent briefing was conducted on 9/3/04. On 10/7, Ecology and DOE-RL agreed to discussions to resolve issues relating to work scope. Schedule for discussions is TBD . Resulting impacts to the work plan schedule will be assessed after discussions.
Deliver draft A RI/FS work plan for regulatory Agency review	12/31/2004	--	On schedule
Deliver Waste Control Plan for regulatory Agency review	4/15/2005	--	On schedule
Start field sampling	7/27/2005	--	On schedule
Deliver Draft A RI Report for Regulatory Agency Review	9/19/2007	--	On schedule
200-TW-1 (includes 200-TW-2)			
EPA/Ecology approve RI Report	7/10/2003	-448-d	Modeling results delivered on 05/21/04 to regulatory agency; waiting on response from USGS. Meeting with USGS held for 09/08/04 to resolve differences. Issue resolution is ongoing
Deliver Draft A FS/PP for Regulatory Agency review	3/31/2004	--	Comments received and document modification underway
Revise FF/PP for Region 10 review	5/18/2004	-120-d	Request from regulatory agency to separate BC Cribs and Trenches to a standalone FFS/PP and withdrawal of the TW1/2 FS/PP. Issue is being worked between RL and regulatory agency.
BC Crib Focused Feasibility Study	9/30/2004	-15	Document delayed until 11/15/04 due to extensive fate and transport modeling.

**200 Area Unit Managers' Meeting
200 Area Remedial Action Float Table
November 2004**

Task	Scheduled Date	Float	Comments
200-UR-1			
Deliver draft A RI/FS work plan for regulatory Agency review	6/30/2004	--	Delivered 6/30/04
Deliver Waste Control Plan for regulatory Agency review	3/1/2006	--	On schedule
Start field sampling	4/26/2006	--	On schedule
Deliver Draft A RI Report for Regulatory Agency Review	5/14/2007	--	On schedule
200-UW-1			
Obtain Regulatory Agency/RL concurrence on SAP	7/29/2004	-82-d	On hold until regulators transmit their comments to RL in early January, 2005 Additional sample locations under discussions
RL Transmit Draft C to Regulatory Agency	9/15/2004	-36-	Draft C FS and PP scheduled for delivery to Regulatory Agencies 12/01/04.
Initiate confirmatory sampling	11/1/2004	--	Confirmation sampling deferred until total number of sample locations agree to with Regulatory Agencies.
200-IS-1/200-ST-1			
Deliver Rev. 1 RI/FS work plan	12/31/2004	--	On schedule
Deliver Waste Control Plan for regulatory agency review	1/24/2005	--	On schedule
200-PW-1/200-PW-3/200-PW-6--			
Deliver Draft A RI Report for	6/30/2006	--	On schedule

**200 Area Unit Managers' Meeting
200 Area Remedial Action Float Table
November 2004**

Task	Scheduled Date	Float	Comments
Regulatory agency Review			
200-MW-1			
Deliver Draft A RI Report for Regulatory agency Review	12/31/2005	--	On schedule
200-CW-5/200-CW-2/200-CW-4/200-SC-1			
Deliver Rev. 1 RI/FS work plan	M-013-22 met on schedule; Rev. 0 work plan approved 9/28/2002. Consolidation TPA change package approved 6/5/2002. Rev. 1 originally scheduled to be delivered 5/6/2003	0-d	Submitted to EPA on 9/20/04
Deliver Rev. 0 RI Report	9/1/2003 (original date based on receipt of regulatory agency comments on 7/15/2003 with 45 days for revision)	0d	ISubmitted to EPA on 8/30/04
Deliver Draft A FS/PP for Regulatory agency Review	10/31/2004	--	Delivered to EPA 10/29/04
200 Area Common - Ecological			
Central Plateau Ecological Evaluation	07/16/04	-157-d	Currently in internal review. Schedule 1 for 11/17 RL review Issue to Agencies 12/15
Central Plateau Ecological DQO	04/22/04	-283-d	New schedule date 01/31/05//
Central Plateau Ecological SAP	06/28/04	-216-d	New schedule date 01/31/05

TABLE A-2. DECOMMISSIONING WELL LIST**FY 2004**

Well Name	Well Name
299-W18-25	299-W22-51
299-W19-8	299-W22-56
299-W19-70	299-W22-58
299-W22-3	299-W23-13
299-W22-39	299-W26-9
299-W22-41	299-W26-10
299-W22-42	299-W23-71

FY 2005

Well Name	Well Name
299-W14-8A	299-W22-12
299-W14-8B	299-W22-13
299-W18-19	299-W22-14
299-W19-3	299-W22-15
299-W19-9	299-W22-16
299-W19-10	299-W22-17
299-W19-11	299-W22-18
299-W19-13	299-W22-29
299-W19-14	299-W22-30
299-W19-15	299-W22-31
299-W19-16	299-W22-32
299-W19-17	299-W22-33
299-W19-21	299-W22-34
299-W22-1	299-W22-35
299-W22-2	299-W22-36
299-W22-5	299-W22-75
299-W22-6	299-W23-6
299-W22-11	

Table A-3. List of Supplemental Wells Supporting CERCLA Monitoring

Well Numbers	Comments
<i>Shallow Monitoring Wells</i>	
299-W10-1	SST(T) tank farm assessment
299-W10-13	LLBG(3) detection monitoring
299-W10-14	LLBG(3) detection monitoring
299-W10-17	SST(TX/TY) tank farm assessment
299-W10-19	LLBG(3) detection monitoring
299-W10-20	LLBG(3) detection monitoring
299-W10-21	LLBG(3) detection monitoring
299-W10-22	SST(T) tank farm assessment
299-W10-23	SST(T) tank farm assessment
299-W10-24	SST(T) tank farm assessment
299-W10-26	SST(TX/TY) tank farm assessment
299-W10-27	SST(TX/TY) tank farm assessment
299-W10-28	SST(T) tank farm assessment
299-W10-4	SST(T) tank farm assessment
299-W10-8	SST(T) tank farm assessment
299-W11-12	SST(T) tank farm assessment
299-W11-24	SST(T) tank farm assessment
299-W11-30	SST(T) tank farm assessment
299-W11-39	SST(T) tank farm assessment
299-W11-40	SST(T) tank farm assessment
299-W11-41	SST(T) tank farm assessment
299-W11-42	SST(T) tank farm assessment
299-W11-7	SST(T) tank farm assessment
299-W14-13	SST(TX/TY) tank farm assessment
299-W14-14	SST(TX/TY) tank farm assessment
299-W14-15	SST(TX/TY) tank farm assessment
299-W14-16	SST(TX/TY) tank farm assessment
299-W14-17	SST(TX/TY) tank farm assessment
299-W14-18	SST(TX/TY) tank farm assessment
299-W14-5	SST(TX/TY) tank farm assessment

Well Numbers	Comments
299-W14-6	SST(TX/TY) tank farm assessment
299-W15-15	LLBG(4) detection monitoring
299-W15-16	LLBG(4) detection monitoring
299-W15-17	LLBG(4) detection monitoring
299-W15-40	SST(TX/TY) tank farm assessment
299-W15-41	SST(TX/TY) tank farm assessment
299-W15-763	SST(TX/TY) tank farm assessment
299-W15-765	SST(TX/TY) tank farm assessment
299-W18-21	LLBG(4) detection monitoring
299-W18-22	LLBG(4) detection monitoring
299-W18-23	LLBG(4) detection monitoring
299-W18-24	LLBG(4) detection monitoring
299-W18-30	SST(U) tank farm assessment
299-W18-31	SST(U) tank farm assessment
299-W18-40	SST(U) tank farm assessment
299-W19-12	SST(U) tank farm assessment
299-W19-41	SST(U) tank farm assessment
299-W19-42	SST(U) tank farm assessment
299-W19-44	SST(U) tank farm assessment
299-W19-45	SST(U) tank farm assessment
299-W19-47*	SST(U) tank farm assessment
299-W22-10	SST(S) tank farm assessment
299-W22-2	SST(S) tank farm assessment
299-W22-44	SST(S) tank farm assessment
299-W22-45	SST(S) tank farm assessment
299-W22-46	SST(S) tank farm assessment
299-W22-47**	SST(S/SX) tank farm assessment
299-W22-48	SST(SX) tank farm assessment
299-W22-49	SST(SX) tank farm assessment
299-W22-50	SST(SX) tank farm assessment
299-W22-79	U-12 crib assessment
299-W22-80	SST(SX) tank farm assessment
299-W22-81	SST(SX) tank farm assessment

Well Numbers	Comments
299-W22-82	SST(SX) tank farm assessment
299-W22-83	SST(SX) tank farm assessment
299-W22-84	SST(S) tank farm assessment
299-W22-85	SST(SX) tank farm assessment
299-W23-15	SST(S) tank farm assessment
299-W23-19	SST(S) tank farm assessment
299-W23-19	SST(SX) tank farm assessment
299-W23-20	SST(SX) tank farm assessment
299-W23-21	SST(SX) tank farm assessment
299-W23-4	SST(SX) tank farm assessment
299-W26-12	S-10 detection monitoring
299-W26-13	S-10 detection monitoring
299-W26-7	S-10 detection monitoring
299-W27-2	S-10 detection monitoring
299-W7-1	LLBG(3) detection monitoring
299-W7-11	LLBG(3) detection monitoring
299-W7-12	LLBG(3) detection monitoring
299-W7-3	LLBG(3) detection monitoring
299-W7-4	LLBG(3) detection monitoring
299-W7-5	LLBG(3) detection monitoring
299-W7-7	LLBG(3) detection monitoring
299-W7-8	LLBG(3) detection monitoring
299-W7-9	LLBG(3) detection monitoring
299-W8-1	LLBG(3) detection monitoring
Deep Monitoring Wells	
299-W6-3	Monitors near bottom of aquifer
299-W6-6	Monitors near bottom of aquifer
299-W7-3	Monitors near bottom of aquifer
299-W10-14	Monitors near bottom of aquifer
299-W11-32	PNNL-10422, piezos, 15 m (50 ft) (mid-depth) below water table
299-W14-9	Screened in lower unit 5, 6, and all of 9 across mud unit
299-W15-17	Monitors near bottom of aquifer

Well Numbers	Comments
299-W18-1	large open interval 0 to 60 m (0 to 200 ft) to below water table, needs recompletion
299-W18-22	Monitors at bottom of aquifer
299-W19-4	Open across mud unit 5-9, needs recompletion, large open interval 0 to 78.8 m (0 to 260 ft) below water table
299-W27-2	Monitors at bottom of aquifer
699-48-77C	Monitors mid-depth in aquifer
699-48-77D	Monitors near the State Approved Land Disposal Site

***299-W19-47 (C4258) was added to this list per approval obtained at the May 2004, UMM.**

****299-W22-47 (C4667) was added to this list per approval obtained at the November 2004, UMM.**

TABLE A-2. DECOMMISSIONING WELL LIST

Listed wells have approved decommissioning profiles/plans and are scheduled for decommissioning.

(This list will be updated as wells are identified for decommissioning, and will be provided at the 200 Areas Unit Manager's Meeting, and included in the UMM minutes)

FY 2004	
Well Name	Well Name
299-W18-25	299-W22-51*
299-W19-8	299-W22-56#
299-W19-70	299-W22-58*
299-W22-3	299-W23-13
299-W22-39	299-W26-9
299-W22-41	299-W26-10
299-W22-42	299-W23-71#
FY 2005	
Well Name	Well Name
299-W14-8A	299-W22-12
299-W14-8B	299-W22-13
299-W18-19	299-W22-14
299-W19-3	299-W22-15
299-W19-9	299-W22-16
299-W19-10	299-W22-17
299-W19-11	299-W22-18
299-W19-13	299-W22-29
299-W19-14	299-W22-30
299-W19-15	299-W22-31
299-W19-16	299-W22-32
299-W19-17	299-W22-33
299-W19-21	299-W22-34
299-W22-1	299-W22-35
299-W22-2	299-W22-36
299-W22-5	299-W22-75
299-W22-6	299-W23-6
299-W22-11	

*Well located under building. No approved profile. Future for well indeterminate at this time. (RLB phone call 11/12/04)

Well administratively decommissioned. (RLB phone call 11/12/04)

Attachment 3B
200-PO-1 Operable Unit Groundwater Well
Decommissioning List

(This list will be updated as wells are identified for decommissioning, and will be provided at the 200 Areas Unit Managers' Meeting, and included in the UMM minutes)

- **Listed Wells have approved decommissioning profiles/plans and are scheduled for decommissioning.**

FY 2004

2-E17-3
2-E25-30
2-E25-30P
2-E25-30Q
6-11-29
6-17-26B
6-17-26BP
6-17-26BQ
6-17-26BR
6-18-27D
6-18-28
6-19-26B
6-19-26BP
6-19-26BQ
6-21-30B
6-25-31
6-25-33B
6-25-33BP
6-25-33BQ
6-26-35D
6-26-35DP
6-26-35DQ
6-35-28
6-42-41
6-43-43

FY 2005

299-E17-2
299-E17-4
299-E17-5
299-E17-6
299-E17-7
299-E17-8
299-E17-10
299-E17-11
299-E19-1
299-E24-1
299-E24-2
299-E24-9
299-E24-10
299-E24-11
299-E24-12
299-E26-3

Ecology Points of Contact
Updated 11-17-04

Central Plateau eco. risk assessment	John Price
200-CS-1	Alicia Hamar
TSD closure & permitting <ul style="list-style-type: none"> • 216-A-29 ditch • 216-B-63 Trench • 216-S-10 ditch & pond 	Jean Vanni
200-CW-1	Jenni Stults
216-B-3 Main Pond: TSD closure & permitting	Jean Vanni
200-IS-1/200-ST-1	Brenda Jentzen
<ul style="list-style-type: none"> • 241-CX-70/71/72 Tanks: TSD closure & permitting • 276-S-141/142 tanks: TSD closure & permitting 	Jean Vanni
DST and SST: TSD permitting & closure	Brenda Jentzen
200-PO-1 (groundwater)	Zelma Jackson
200-LW-1/200-LW-2	Jenni Stults
200-PW-2/200-PW-4	Jenni Stults
TSD permitting & closure: <ul style="list-style-type: none"> • 216-A-10 Crib • 216-A-36B Crib 	Jean Vanni
200-TW-2	Jenni Stults
200-SW-1/200-SW-2	Jenni Stults
NRDWL: permitting and closure	Jean Vanni
Low-level burial grounds: TSD closure & permitting	Matt Mills
200-TW-2 (includes 200-PW-5)	Jenni Stults
200-UP-1	Zelma Jackson
200-UR-1	Jenni Stults
200-UW-1 (U Plant Area waste sites)	Brenda Becker-Khaleel
216-U-12 crib: TSD closure & permitting	Alicia Hamar

APPROVAL OF THE CARBON TETRACHLORIDE EXPEDITED RESPONSE ACTION
(200-PW-1 OPERABLE UNIT) SOIL VAPOR MONITORING PLAN FOR
NOVEMBER 2004 THROUGH MARCH 2005

The Unit Managers for the Carbon Tetrachloride Expedited Response Action (200-PW-1 Operable Unit) approve the attached Soil Vapor Monitoring Plan for November 2004 through March 2005.

A. C. Tortoso 11/8/04 D. A. Faulk 11-9-04

A. C. Tortoso
U.S. Department of Energy
Richland Operations Office

Date D. A. Faulk Date
U.S. Environmental Protection Agency
Region 10, Hanford Office

CARBON TETRACHLORIDE EXPEDITED RESPONSE ACTION
SOIL VAPOR MONITORING PLAN FOR NOVEMBER 2004 THROUGH MARCH 2005

Non-Operational Monitoring and Passive Soil Vapor Extraction Monitoring

This plan describes planned non-operational monitoring and passive soil vapor extraction monitoring to be conducted during November 2004 through March 2005 for the 200 West Area Carbon Tetrachloride Expedited Response Action (200-PW-1 Operable Unit). Operation of the soil vapor extraction system will be temporarily suspended during this time, and monitoring will be conducted at both the 216-Z-9 (Z-9) site and the 216-Z-1A/Z-18/Z-12 (Z-1A) site. Passive soil vapor extraction will be maintained at Z-1A wells during this time. Operating plans for use of the soil vapor extraction system will be submitted to the Unit Managers for approval prior to implementation.

Soil vapor monitoring will be conducted at vadose zone locations near the groundwater, the Cold Creek unit (formerly called the Plio-Pleistocene layer), and the ground surface at the Z-1A and Z-9 sites while they are not being actively remediated using the soil vapor extraction system. Monitoring results will be reported at the 200 Area Unit Manager Meetings. If carbon tetrachloride vapor concentrations increase such that the carbon tetrachloride contamination may impact human health or the environment (including groundwater), the Unit Managers will decide on the appropriate response to mitigate the problem (e.g., relocating the soil vapor extraction system to address the problem).

Two wells will be drilled in the vicinity of the Z-9 site from November through December 2004. One well is being drilled on the south side of the 216-Z-9 Trench to investigate the aquifer for the presence of dense, nonaqueous-phase liquid carbon tetrachloride. The second well will be drilled to the north of the 216-Z-9 Trench to enhance the groundwater monitoring network for the 200-ZP-1 groundwater plume. An additional 200-ZP-1 groundwater monitoring well is being drilled in the vicinity of the Z-1A site during November 2004. Monitoring locations at the Z-9 and Z-1A sites will be adjusted as needed to accommodate these drilling activities.

Scope: Monitor carbon tetrachloride soil vapor concentrations at selected probes and wells during non-operation of the soil vapor extraction (SVE) system (Tables 1 and 2). All of the probes and wells will be "non-operational," i.e., they will not be connected to the SVE system. Approximately eight non-operational wells have a passive soil vapor extraction system installed at the wellhead.

Passive soil vapor extraction is a remediation technology that uses naturally induced pressure gradients between the subsurface and the surface to drive soil vapor to the surface. In general, falling atmospheric pressure causes subsurface vapor to move to the atmosphere through wells, while rising atmospheric pressure causes atmospheric air to move into the subsurface. The passive soil vapor extraction systems will be used to remove carbon tetrachloride from the vadose zone.

Passive extraction wells will vent through aboveground canisters containing granular activated carbon (GAC). The wells will be monitored monthly using the sampling method used for the non-operational wells. The vapor concentration will be monitored both upstream and downstream of the GAC. The measured vapor concentrations will be used to estimate the amount of carbon tetrachloride extracted through each well during the month.

For monitoring the non-operational probes and wells and the passive extraction wells, the components of this scope are:

- Collect soil vapor samples using the rebound study sampling method and sampling pump (BHI-01105)
- Analyze soil vapor samples for carbon tetrachloride using the B&K multi-gas analyzer in accordance with GPP-EE-05-4.0 at field screening level QC-1 (CP-A-QA-03-5.2)
- Evaluate concentration trends for Fluor Hanford Groundwater Remediation Project
- Report results to 200-PW-1 Unit Managers
- Include results in annual reports

Purpose and Objectives: The purpose of non-operational monitoring is to measure carbon tetrachloride concentrations in the vadose zone during the shutdown of the SVE system.

The objectives of monitoring the non-operational wells and probes are (1) to be cognizant of carbon tetrachloride concentrations and trends near the vadose-atmosphere and vadose-groundwater interfaces to evaluate whether non-operation of the SVE system is negatively impacting atmosphere or groundwater; and (2) to be cognizant of carbon tetrachloride concentrations and trends near the lower permeability Cold Creek unit to provide an indication of concentrations that can be expected during restart of SVE operations and to support selection of on-line wells.

The objectives of monitoring the passive soil vapor extraction system wells, which are all open near the vadose-groundwater interface, are: (1) to be cognizant of the carbon tetrachloride concentrations and trends near the vadose-groundwater interface to evaluate whether non-operation of the SVE system is negatively impacting groundwater; and (2) to quantify the mass of carbon tetrachloride removed using this technology.

Duration: Non-operational monitoring and passive soil vapor extraction monitoring will be conducted from November 2004 through March 2005 during FY 2005.

Monitoring Frequency: Monitoring will be conducted monthly.

Monitoring Locations: Locations were selected to focus carbon tetrachloride monitoring near the vadose-atmosphere and vadose-groundwater interfaces and near the Cold Creek unit (Table 1). At the recommendation of the technical lead, and with approval from the task lead, these monitoring locations could be revised based on developing trends, accessibility, and/or recommendations of the sampler. The 200-PW-1 Unit Managers will be advised of any changes

to the monitoring locations. Monitoring locations are shown on Figure 1.

Data Management: The field screening data obtained from non-operational wells and probes and passive extraction wells are entered into a controlled field logbook, which is maintained by Lockheed Martin Services Inc (LMSI) Records Information Management (RIM) department. The technical lead organizes and maintains spreadsheets of the field screening data on a desktop computer. The field screening data are entered into the Hanford Environmental Information System (HEIS) database and are included in the annual performance evaluation report.

References:

CP-A-QA-03-5.2, *Quality Assurance Program Plans*, Procedure 5.2, "Onsite Measurements Quality Assurance Program Plan," Fluor Hanford, Inc., Richland, Washington.

GPP-EE-05-4.0, *Analysis of Volatile Organic Compounds in Vapor Samples Using the Bruel and Kjaer 1301 and Innova 1312 Multi-Gas Analyzers*, Fluor Hanford, Inc., Richland, Washington.

BHI-01105, 1997, *Rebound Study Report for the Carbon Tetrachloride Soil Vapor Extraction Site, Fiscal Year 1997*, Bechtel Hanford, Inc., Richland, Washington.

Table 1. Distribution of Selected Monitoring Locations.

Target Zone	Number of Monitoring Locations		
	Z-1A	Z-9	Total
Near-surface (3-20 m below ground surface)	6	6	12
Cold Creek unit (25-45 m below ground surface)	5	5	10
Groundwater (50-65 m below ground surface)	8 ^a	2	10
Total	19	13	32

^a Approximately eight available monitoring locations near the vadose/groundwater interface in the Z-1A area are being monitored as part of the passive soil vapor extraction system network (Table 2).

Table 2. Wells and Probes Selected for Non-Operational Monitoring and Passive Soil Vapor Extraction Monitoring.

Target Zone	Z-9	Depth (m)	Comment	Z-1A	Depth (m)	Comment
near-surface	CPT-17 10 ft (blue)	3	southwest of Z-9	CPT-32 25 ft (green)	8	west of Z-1A
near-surface	CPT-18 15 ft (white)	5	northwest of Z-9	CPT-30 28 ft (green)	9	north of Z-18 (middle of Z-1A/Z-18/Z-12 field)
near-surface	CPT-16 25 ft (blue)	8	east of Z-9	CPT-13A 30 ft (blue)	10	southeast of Z-1A
near-surface	CPT-27 33 ft (red)	10	southeast of Z-9	CPT-7A 32 ft (yellow)	10	farfield northeast of Z-1A
near-surface	CPT-21A 45 ft (green)	14	south of Z-9	CPT-1A 35 ft (black)	11	west of Z-12
near-surface	CPT-9A 60 ft (blue)	18	farfield north of Z-9	CPT-C3872	19	east side of Z-1A
Cold Creek	W15-82	25	east side of Z-9	W18-165	33	within Z-1A
Cold Creek	CPT-21A 86 ft (red)	26	south of Z-9	W18-152	34	northwest corner of Z-12
Cold Creek	CPT-28 87 ft (red)	27	farfield south of Z-9	W18-167	37	within Z-1A
Cold Creek	W15-217	35	southwest corner of Z-9	W18-249	41	northeast corner of Z-18
Cold Creek	W15-95L	44	north side of Z-9	W18-248	41	east side of Z-1A
ground water	W15-84L	55	west of Z-9	W18-247L*	51	southeast of Z-18
ground water	W15-9L	57	north of Z-9, 11 m from W15-32 extraction well	W18-246L*	52	west of Z-1A
ground water	---	---	---	W18-252L*	53	west of Z-1A (middle of Z-1A/Z-18/Z-12 field)
ground water	---	---	---	W18-10L*	55	east side of Z-18
ground water	---	---	---	W18-7*	57	east side of Z-1A
ground water	---	---	---	W18-6L*	60	west side of Z-1A
ground water	---	---	---	W18-11L*	60	Z-18
ground water	---	---	---	W18-12*	60	Z-18

* Passive soil vapor extraction wells

Note: Colors refer to the color coding on the soil vapor probe tubing.

Global Issue: contaminants of concern (COC) are established through an evaluation of process history, existing site characterization data and investigation of the site. An exclusion process is then used to drop individual chemicals and radionuclides from the COC list. Some exclusion rules are not controversial (e.g., exclusion of short-lived radionuclides that decay quickly to undetectable and insignificant concentrations). There is uncertainty inherent in other exclusion rules, and considerable time can be spent to reach consensus on excluded contaminants. A small analytical list is desirable to avoid calculating a significant theoretical risk for contaminants that are not detected: due to the risk assessment convention of calculating risk for non-detected contaminants at a concentration of one-half the analytical detection limit

However; a large analytical list is desirable to achieve the confidence of all parties that unknown or unlikely contaminants and their breakdown products will be found even if there are errors in the COC exclusion process or process history knowledge. Both EPA's Contract Laboratory Program and SW-846 target compound lists came from the USEPA Priority Pollutant list which was a huge effort designed to capture contaminants representative of a broad range of pollutants found across the nation that were known from industrial, agricultural, etc. usage. Also, break down products from biodegradation, etc. were added to the list. It is not completely known where and which chemicals were disposed of at the site. The uncertainty in process knowledge supports a more conservative approach.

Resolution: contaminants of concern will be identified based on process history, existing site characterization data, and new data produced by field investigation. Each sampling and analysis plan will specify method-based analysis; the reported data will include both the COCs and all other analytes in the method analysis. The risk assessment will not calculate risk for non-COCs that are non-detected. If "unexpected" chemicals are reported at concentrations greater than the analytical detection limit, they will be added as COCs. Ecology and EPA may approve the exclusion of unexpected chemicals from risk calculations on a case-by-case basis. The inclusion or exclusion of unexpected chemicals in risk assessment calculations will be reported in the RI/FS report.

**DISTRIBUTION
UNIT MANAGERS' MEETING,
200 AREA GROUNDWATER SOURCE OPERABLE UNITS**

DOE/RL

Steve Bertness	A6-39
Bryan Foley	A6-38
Arlene Tortoso	Electronic Copy

EPA

Craig Cameron	B5-01
---------------	-------

Ecology

Brenda Jentzen	Electronic Copy
Tina Masterson-Heggen	H0-57
John Price	H0-57
Jennie Stults	H0-57
Jean Vanni	H0-57

FH

Becky Austin	H8-68
Lanny Dusek	R3-62
Gloria Cummins	H8-12
Bruce Ford	E6-35
Jane Borghese	E6-35
Mary Todd-Robertson	E6-35

CHG

Curt Wittreich	H6-62
----------------	-------

PNNL

Stuart Luttrell	K6-96
-----------------	-------

Administrative Record (2)

Debbi Isom	A3-01
	H6-08

Please inform Gloria Cummins – FH (372-9360)
of deletions or additions to the distribution list.