

Environmental
Restoration
Contractor

ERC Team

Meeting Minutes

072349

Job No. 22192

Written Response Required: NO
Due Date: N/A
Action: N/A
Class CCN: N/A
OU: 100-HR-3
TSD: N/A
ERA: N/A
Subject Code: 8960

SUBJECT DISPOSITION OF COMMENTS ON THE 100-HR-3 OPERABLE UNIT RECORD OF DECISION AMENDMENT FOR IN SITU REDOX MANIPULATION

TO Distribution

FROM G. A. Day (H)

DATE September 7, 1999

ATTENDEES

G. A. Day H0-21
L. E. Gadbois B5-01
R. L. Jackson H9-02
W. W. Soper B5-18
A. C. Tortoso H0-12
B. L. Vedder H0-02

DISTRIBUTION

Attendees
J. W. Badden H9-03
J. S. Fruchter K6-96
G. C. Henckel
J. D. Isaacs H0-21
L. M. Johnson H9-01
R. W. Ovink H9-03
W. H. Price H0-20
V. J. Rohay H0-21
L. C. Swanson H9-02
V. R. Vermeul K6-96
M. D. Williams K9-36
Administrative Record c/o H0-09 w/a
Document and Information Services H0-09

A meeting on the above subject was held on August 31, 1999 at 3350 George Washington Way, conference room 2C58. The purpose of the meeting was to reach resolution for response to three disposition comments on the draft Amended Record of Decision for the 100-HR-3 Operable Unit (Amended ROD).

Response resolution for the three specified disposition comments is as follows:

- **Comment #34:** Page 9, 6th bullet. Rewrite as "treatment barrier width shall be determined". Add "The initial length, as indicated in figure 2, shall be approximately 800 meters".
 - **Response:** Accept with modification. Bullets 2 and 6 reworded to the following and moved as new 2nd bullet: "The treatment barrier will be designed in accordance with the RDR/RAWP to attain the RAOs identified in the ROD Amendment for this plume. Injection wells shall form a continuous treatment zone. The locations, spacing, and overlap will be established in the RDR/RAWP. Based on recent treatability and numerical modeling studies, the initial injection spacing is anticipated to be approximately 10.5 to 12.5 meters apart. Hydrogeologic and chemical field parameters shall be monitored during installation of the treatment barrier to optimize emplacement process and barrier design."
 - **Resolution:** Accept response.
- **Comment #35:** Page 9. Need a new bullet along the lines that if compliance monitoring indicates a breakthrough or the barrier is not long enough, then if new injection wells are needed, and they shall be

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installed within xxx months. The treatment barrier shall be (re)established within xxx months via reinjection of dithionite.

- Response: Accept with modification. "If barrier breakthrough is identified the Ecology and EPA will determine alternative approaches and recommend appropriate action."
- Resolution: Response modification. "If barrier breakthrough is identified, Ecology and EPA will determine alternative action to be taken."
- **Comment #36**: Page 9. Need a new bullet that the initial 800 meter barrier shall be installed (wells drilled and chemicals injected) within 15 months.
 - Response: Accept with modification. "The installation of the treatment barrier shall be initiated within 15 months after signing the ROD Amendment and fully implemented in accordance with the implementation schedule in the RDR/RAWP."
 - Resolution: Response Modification. "The installation of the treatment barrier shall be initiated within 15 months after signing the ROD Amendment and fully implemented by end of Fiscal Year 2002, based on current knowledge of plume and implementability of the treatment technology. Design and schedule will be implemented in accordance with the RDR/RAWP."

WA Department of Ecology has received four public response comments. Copies of the comments were provided to meeting attendees for review.

W. W. Soper (WA Department of Ecology) followed up on the difference between the federal and state hexavalent chromium ambient water quality standards for protection of aquatic receptors, and the value documented in the Interim ROD. The hexavalent chromium water quality standard stated in the Interim ROD and in the proposed Amended ROD (11µg/L) will remain as is until further notice.

Ecology and EPA identified the need to clarify modular tank facility permitted status for ISRM implementation, byproduct waste disposal. In addition, both parties stated the need for a detailed ISRM implementation schedule to be provided in the RDR/RAWP.

Actions

R. L. Jackson (CHI) will incorporate resolved comments resolutions into the Amended ROD. The Amended ROD will be available for review by the end of the week. A comment response summary will be provided with the Amended ROD for internal review.

W. W. Soper (Ecology) will provide public comments responses. The responses will be provided as an attachment to the Amended ROD.

W. W. Soper (Ecology) will schedule a future meeting with A. C. Tortoso to discuss the draft RDR/RAWP.