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MEETING NOTES

Waste Management Area C RCRA Facility Investigation Report

MEETING DATE: January 21, 2016

LOCATION: 3110 Port of Benton Blvd., Richland, WA

ATTENDEES:

Mike Barnes (Ecology)	Jeremy Johnson (DOE-ORP)	Julie Robertson (Freestone)
Joe Caggiano (Ecology)	Alexander Pappas (WRPS)	Beth Rochette (Ecology)
Damon Delistraty (Ecology)	Dan Parker (WRPS)	Maria Skorska (Ecology)
Andrea Hopkins (WRPS)	Anna Radloff (WRPS)	Cindy Tabor (WRPS)

BACKGROUND INFORMATION: The meeting was called to promote continued Ecology, EPA, DOE, and WRPS discussion about comments associated with and revision of RPP-RPT-58339, Rev. A Draft Phase 2 RCRA Facility Investigation Report for Waste Management Area C (WMA C RFI Report). The report was submitted to Ecology and EPA in December 2014 to meet Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-045-61. Ecology's February 23, 2015 response to the RFI report submittal (Letter 15-NWP-37) noted that holding "a recurring meeting to discuss statements, regulatory interpretations, and the process steps for obtaining an agreeable RFI/CMS process for WMA C Closure" would be beneficial. Lists of expectations, agreements, and actions (including the status of any actions) are documented in the meeting notes.

PURPOSE OF MEETING: This meeting was called to discuss select comments on the WMA C RFI Report.

STATUS OF PRIOR MEETING NOTES: Ms. Robertson reported that notes from the January 7, 2016 meeting are in internal review and should be provided to Ecology for review the week of January 25.

DISCUSSION OF SELECT ECOLOGY COMMENTS ON WMA C RFI REPORT: WRPS provided a hand-out (attached) of select Ecology comments from the July 7, 2015 letter (Letter 15-NWP-120) regarding the WMA C RFI Report and proposed responses.

- The attendees tentatively agreed to the proposed resolutions for the following comments pending their incorporation into the revised WMA C RFI Report:
  - Joe 6, 8, 15, 21, 28, 76, 80
  - Mike 13
  - Beth 1.
- The attendees tentatively agreed to the following changes to proposed resolutions, pending incorporation into the revised WMA C RFI Report:
  - Joe 11: The proposed additional sentence will be modified to state "The intent of interim stabilization was to pump the drainable liquids out of the SSTs, leaving behind the solids (saltcake), non-pumpable interstitial fluids, and sludges."
  - Joe 19 and 22: The proposed response will be modified to replace "possible" with "likely."
  - Joe 79: Modify the response to indicate that both the original Figure 2-8 and an updated one will be included in the revised WMA C RFI Report.
  - Mike 10: Modify the response to indicate that a plan has been developed, refer to DOE letter 11-TPD-085, "RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY (ECOLOGY) COMMENTS CONCERNING THE CATCH TANK C-301 RETRIEVAL FEASIBILITY STUDY, RPP-RPT-45723," dated November 7, 2011, and state that sampling has not yet occurred.
- The meeting attendees were uncertain about which individual(s) made ECY comments 1, 2, 3, 4, 5, and 6; therefore, no resolution could be reached. See action list item 2016-01-13-2.

S-7-4

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<b>ACTIONS (2 pages)</b>			
<b>Action Number</b>	<b>Actionee</b>	<b>Description</b>	<b>Status</b>
		clarify what groundwater technical information Ecology needs to see in the RFI report. The parties will also identify whether that information is in 200-BP-5 documents, and if so, where.	meeting to discuss the action.
2015-10-28-2	Ryan Beach	Based on input from Action 2015-10-28-1, DOE-ORP and -RL will meet to discuss how the necessary groundwater information could be provided to Ecology.	In progress.
2015-10-28-3	Cindy Tabor	Regarding WMA C tank and soil inventory/leak information, WRPS/DOE will prepare a table with values to be used as the basis for corrective action decision making and will provide the basis information (e.g., reference documents) as footnotes/supporting information. Information in the table will be reviewed in a future meeting, the table incorporated into the meeting notes, and the notes entered into the HFFACO Administrative Record.	In progress. The soil inventory report (RPP-RPT-42294) is being revised. Mike Barnes will contact Jim Field (WRPS) regarding updated information provided to Ecology the week of 1/11/16.
2016-01-07-1	Cindy Tabor	Email to Ecology the compiled responses revised as a result of discussions held in these recurring meetings. Suggested Ecology recipients: Delistraty, Rochette, Lyon, Barnes, Yokel.	In progress. Revised responses are in development.
2016-01-07-2	Ryan Beach	Provide Ecology comments on the WMA C Groundwater Screening Report (RPP-RPT-58297, Rev. 0) to DOE-RL representatives for the 200-BP-5 Operable Unit.	Completed 1/7/16. Closed 1/13/16.
2016-01-21-1	Cindy Tabor	Identify and report back regarding where WMA C RFI Report provides information on the currently agreed-to RFI/CMS process.	New.
2016-01-21-2	Cindy Tabor	Contact Jeff Lyon by email (copying DOE and Mike Barnes) to resolve ECY comments.	New.
2016-01-21-3	Mike Barnes	Provide Jeremy Johnson and Cindy Tabor with recently developed information on integration of vadose zone and groundwater programs.	New.
2016-01-21-4	Ryan Beach	Provide Ecology comments Beth 2, Damon 46, and Damon 47 to DOE-RL representatives for the 200-BP-5 Operable Unit.	New.
2016-01-21-5	Ryan Beach	Track DOE-RL responses to Ecology comments related to groundwater (200-BP-5) and report back at future WMA C RFI Report meetings.	New.

Attachment (3 pages)  
Select Ecology Comments on WMA C RFI Report

Commentor	Item	Page #/ section # Line #	Tied to Comment	Comment & Basis/Justification	Doc	Chapter(s)	Comment Sub-Category
Joe	6	Pg. 1-2, Lines 5-9.		As the TWEIS has already determined that wastes will be left in place and a work plan will be developed to characterize the releases, then why is this statement even present in this document here? Furthermore, it is known that there are SST contaminants from WMA C in the soil and groundwater, so assessing the need for corrective measures is moot. Please re-think and revise this document.	RFI	1	No change required. The first several paragraphs of Section 1 of the RFI report provide general background information about the RCRA corrective action process as modified by HFFACO Action Plan Appendix I for SSTs. The information is provided as a framework for this particular RFI report. The text on page 1-2, lines 5-9, is modified from EPA 530/SW-89-031, <i>Interim Final RCRA Facility Investigation (RFI) Guidance Volume 1 of IV Development of an RFI Work Plan and General Considerations for RCRA Facility Investigations</i> , which states "If the potential need for corrective measures is identified during the RFI process, the owner or operator is then responsible for performing a CMS" (Section 1.2, Page 1-7). This introductory text does not presuppose knowledge of the results of the RFI, and so simply reflects the basic regulatory drivers behind the corrective action process.
Joe	8	Pg. 1-9, Sect. 1.1.3	Joe 76	A statement should be made that groundwater monitoring was not conducted during operation of C Farm which ceased operating in 1980 or earlier. Groundwater monitoring began in 1989 with installation of 4 wells. No groundwater monitoring wells were present during operation of C Farm. A single well was installed in 1982 (299-E27-7) which doesn't satisfy RCRA groundwater monitoring requirements. Please add.	RFI	1	Text will not be modified in Section 1 or Section 5 (refer to Joe 76); however, text will be added in Section 2.4.6.3 (Groundwater Monitoring Program): <b>2.4.6.3 Groundwater Monitoring Program.</b> The Hanford Groundwater Protection Program has extensively monitored the groundwater in and around WMA C as part of the 200-BP-5 OU. In addition, at WMA C groundwater monitoring is conducted for compliance with WAC 173-303-400 (and by reference 40 CFR 265, Subpart F) because WMA C is an HWMA (RCW 70.105) TSD unit. These regulations require monitoring to determine whether dangerous waste or dangerous waste constituents from the waste site have entered the groundwater. Data from groundwater monitoring wells are used to evaluate the 200-BP-5 OU. Groundwater monitoring at WMA C began in the early 1980s, and a RCRA groundwater monitoring program for WMA C was initiated in 1989. It is significant to note, however, that groundwater monitoring was not conducted for the bulk of the time that C Farm was used for operational purposes.  <b>RCRA Monitoring</b> A-Between 1989 and 2001, the WMA C RCRA groundwater monitoring program for WMA C was initiated in 1989 (conducted pursuant to WAC-SD-EN-AP-012 (Rev. 0, followed by Rev. 1 in 1991)). Through Between 2001 and 2009, groundwater monitoring was conducted in accordance with PNNL-13024.
Joe	28	Pg. 1-8, bullet 2		As written, this statement implies that reclassification of residual tank waste as LAW, regardless of content and mass, is a foregone conclusion to facilitate closure. While this work may support the WIR evaluation process, it should not be construed as supporting an already-done and foregone conclusion. Please clarify, discuss or delete.	RFI	1	Text will be revised to state: "A Waste incidental to Reprocessing determination under DOE O 435.1." This states the process and cites the governing order. The tank waste has not been classified as HLW, but is being managed as HLW. This is consistent with language used in the TC&WM EIS, TRU tank disposal planning documents, and the WTP design.
ECY	2	1-9, lines 31-33		RPP-PLAN-37243, Rev 2 states that the PA will be used to support the RFI (Section 3.4.1). That is no longer the case. Please identify what portions of the Master Plan are still applicable. Specific Issues: • RPP-PLAN-37243, Rev 2, pg 4-2: "Specifically, this interrelationship shows the CMS feeding back into the performance assessment and closure plan "development & revision" in recognition that WMA contaminated soil is an integral component of the WMA final closure decision making process." - RFI shows CMS as separate from the closure plan with no feedback (see Fig 1-4)	RFI	1	The reference to the master work plan will be removed from this paragraph. <del>The master plan for integrating the RCRA corrective action process, the RCRA treatment, storage, and disposal (TSD) unit closure process, and the CERCLA groundwater OU remedial investigation/feasibility study (RI/FS) process is RPP-PLAN-37243, Phase 2 RCRA Facility Investigation/Corrective Measures Study Master Work Plan for Single-Shell Tank Waste Management Areas. The integration between the vadose zone program and the groundwater program is described in Section 5 of this master work plan (RPP-PLAN-37243). Additional detail regarding integration of RCRA and CERCLA requirements for closure of WMA C, specifically, is contained in RPP-46459, Single-Shell Tank Waste Management Area C RCRA/CERCLA Integration White Paper.</del>
ECY	3	1-9, lines 33-34		"The integration between the vadose zone program and the groundwater program is described in Section 5 of this master work plan (RPP-PLAN-37243)." The material is not in Section 5, please correct.	RFI	1	See ECY 2 Comment Response
ECY	4	1-9, lines 34-37		"Additional detail regarding integration of RCRA and CERCLA requirements for closure of WMA C, specifically, is contained in RPP-46459, Single-Shell Tank Waste Management Area C RCRA/CERCLA Integration White Paper."	RFI	1	What is the comment?
Joe	11	Pg. 2-8, lines 35-37		I suggest explaining the purpose of interim-stabilization; i.e., to remove liquids from the SSTs to minimize leak potential. Please consider.	RFI	2	In the mid-1950s, leaks were suspected or detected in some SSTs. To address concerns about SST designs, the Hanford Site adopted a new double-shell tank (DST) design that would allow for detection of leaks and effective corrective actions before the waste could reach the surrounding soil. Between 1968 and 1986, a total of 28 DSTs were constructed and filled with liquids pumped from SSTs. These SSTs were subsequently interim-stabilized to minimize the potential for future leaks. <del>Interim stabilization consisted of pumping the drainable liquids out of the SSTs, leaving behind the solids (saltcake) and sludges.</del> The interim stabilization program was completed in 2009. Newly generated waste is also stored in the DSTs.
Joe	15	Section 2.3.5	Joe 44, 47	This section discusses natural recharge only. What about all the sources of artificial recharge that in total added significantly more recharge than natural precipitation? This artificial recharge has had a significant effect on driving contaminants to groundwater. Please include.	RFI	2	No change required. The information in this section pertains to natural recharge associated with the overall Hanford Site. Sections 2.4.4 (Vadose Zone Recharge), 2.4.5 (Enhanced Recharge and Preferential Pathways), and 2.4.6 (Groundwater) pertain specifically to WMA C and do discuss artificial recharge.
Joe	19	Pg. 2-34, lines 41-46.	Joe 22	If there are six events that have been documented since 1979, one could surmise that more events occurred between 1945 and 1979 that were undocumented but have the potential to add still further contaminant-driving force to the vadose zone. Please address.	RFI	2	Text will be changed to (beginning on line 44) <del>While it is possible there have been events prior to this,</del> the first recorded event took place in 1979...
Joe	21	Section 2.4.5.		When surface contaminant spills/releases occurred during operations, water was often added to the soil to "wash down the contaminants" to make the site safe for workers to occupy. Please add.	RFI	2	The application of water to the soil for controlling the spread of contamination is discussed in Section 2.4.5.7.

Joe	22	Pg. 2-39, Table 2-1	Joe 19	These are the documented incidents. Makes one wonder how many might have occurred during operations that were never documented. Please consider.	RFI	2	Text has been added in Section 2-34. See Joe 19 Comment Response.
Joe	79	Pg. 2-22, Fig. 2-8.		This map shows groundwater flow through Gable Gap. This has occurred in the past during operations when the water table was higher than at present. Since ~2011, it appears flow no longer occurs through Gable Gap and that the Gable Mt. structure is now a groundwater divide. Please correct as appropriate. A more recent water table map may make this point clearer.	RFI	2	Figure will be updated. Figure 2-8 was taken from the most recently published groundwater report available at the time the RFI report was developed. The revised RFI report will incorporate information from newer groundwater reports, which show a change to the groundwater flow direction at Gable Gap.
Joe	80	Pg. 2-39, Table 2-1.		These are likely only a few of the documented water line releases in and around C Farm. These water lines likely experience at least a 10% chronic leak loss during their use. A draft report for BWIP estimated upwards of a 30% loss of raw water delivered to the 200 East Area. Considering the diameter of these pipes and the pressure maintained within, some estimate needs to be made to account for the arrival of C Farm contaminants within a 30 year period. Please discuss.	RFI	2	No text change required. The text that accompanies Table 2-1 appears on page 2-35. Page 2-35, lines 24-41, discuss the BWIP report suggested in the comment, the fact that there were likely additional water line releases beyond those noted in Table 2-1, and that water line losses had the potential to significantly impact the movement of contaminants in the vadose zone. Any quantitative estimate of the actual impact of such losses would be part of the modeling effort and as such is not included in this Section 2.4.5 qualitative discussion of "Potential Sources of Enhanced Recharge and Preferential Pathways."
Mike	10	3.6.3 Ancillary Equipment	Mike 8	<p>In the second paragraph you state that no decision or direction has been given to date regarding removal of waste from ancillary equipment. This is not true; Ecology has given direction for retrieval and removal of waste from the C-301 catch tank see letter (11-NWP-045 of May 23, 2011 from Jeff Lyon to Scott Samuelson Re: Catch Tank C-301 Retrieval Feasibility Study, RPP-RPT-45723 Accession # 1106011341.</p> <p>The C-301 Catch Tank                  From RPP-RPT-45723 seems important to sample and analyze for retrieval purposes                  The 241 -C-301I catch tank is assumed to contain the waste types involved in active 241 -C tank farm waste transfers for the period 1949 to 1980 (WHC-SD-EN-ES-040, Engineering Study of/SO Miscellaneous Inactive Underground Radioactive Waste Tanks Located at the Hanford Site Washington).</p> <p>The acquisition of current liquid and solid samples are necessary to support any future retrieval operations from the 241 -C-301 catch tank. The result from the analyses impacts the ultimate design and deployment of the final catch tank retrieval system and transfer alternatives. The acquisition of liquid and solid samples from the catch tank are being pursued. Updated liquid and solid waste levels should be measured when samples are obtained from the catch tank. If the waste level of the catch tank has increased from the 1985 level, then the most likely cause could be attributed to rainwater intrusion. In the event the liquid level is substantially less, or missing, then a leak from the tank would be suspected and the tank integrity would be considered compromised. The potential for evaporative losses from the tank are minimal since the tank is sealed and there is no ventilation, either passive or active. The integrity of the catch tank would influence the selected method of retrieval.</p> <p>Ecology has repeatedly asked for information and a schedule for the activities on C-301 Catch Tank and no response has been given to date.</p>	RFI	3	<p>No change required. The purpose of this section is to "...[provide] the estimated volume and radiological and non-radiological inventory for waste residuals that may remain in tanks, ancillary equipment, and pipelines in C Farm at the time of closure." That is what is done in the section. DOE's baseline plans include retrieval of waste from 241-C-301 Catch Tank; however, decisions regarding how retrieval will occur and how much waste will be retrieved will be made based on visual inspections of the tank and waste, and characterization of the tank contents. As stated in RPP-RPT-45723, Catch Tank 241-C-301 Retrieval Feasibility Study, "[f]ollowing sampling and analysis of the solids inventory in 241 -C-301, the characteristics of the waste may be used to establish alternate (e.g., risk based) retrieval criteria." Also as stated in RPP-RPT-45723, "[w]aste retrieval technology selection for C-301 will be a function of two primary criteria that include: 1) the integrity of the tank, and 2) how much waste needs to be removed from the tank."</p> <p>Note that the letter cited does not direct ORP to retrieve 241-C-301 Catch Tank. The letter provides comments on RPP-RPT-45723 and specifically requests that "...USDOE-ORP include Ecology in discussions involving future plans and activities for [241-C-301 Catch Tank]. Ecology requests USDOE-ORP provide a schedule that includes the completion of the following decision points:</p> <ul style="list-style-type: none"> <li>- Initial sampling.</li> <li>- Potential for flammable gas.</li> <li>- Assessment of methods of retrieval.</li> <li>- Evaluation of methods of retrieval.</li> <li>- Basis for the selection of retrieval technology.</li> <li>- Development of a Tank Waste Retrieval Work Plan.</li> <li>- Final assessment of the tank residuals.</li> <li>- A completion date for retrieval of this tank."</li> </ul> <p>Letter S. Samuelson (ORP) to J. Hedges (Ecology), "RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY (ECOLOGY) COMMENTS CONCERNING THE CATCH TANK C-301 RETRIEVAL FEASIBILITY STUDY, RPP-RPT-45723", 11-TPD-085, dated November 7, 2011, closed out Ecology's comments on RPP-RPT-45723 and provided the scheduled baseline dates for characterization and retrieval activities for 241-C-301 Catch Tank as of that time. It was noted in 11-TPD-085 that the schedule for baseline activities associated with the retrieval of the 241-C-301 Catch Tank were being reevaluated and will likely change from the dates provided, and that ORP would brief Ecology on new dates as those dates are developed.</p> <p>Based on 11-TPD-085, it should be noted that the assertion that "Ecology has repeatedly asked for information and a schedule for the activities on C-301 Catch Tank and no response has been given to date" is incorrect.</p>
Mike	13	3.6.3.3 Diversion Boxes	Mike 8	<p>3.6.3.3 Diversion boxes</p> <p>If you state that any waste in the diversion boxes will be removed after retrieval than I would expect the closure plan to list a step for opening up each of the diversion boxes and confirming there is no waste remaining. Question: how do you plan to measure no contamination remaining after retrieval?</p>	RFI	3	Text will be clarified to identify that activities associated with closure of the diversion boxes will be addressed in the closure plans. <u>Revise the paragraph to say: During normal operations, diversion boxes were flushed and drained after each use. No current waste estimates exist for the diversion boxes, however, operators have reported that little or no waste remains. This will be verified prior to closure and addressed in the closure plans.</u>
Beth	1	RFI Chapter 5 p. 5-83, lines 9-10		The document states "A peak <sup>137</sup> Cs concentration of 1,200,000 pCi/g was detected at 15.24 m (50 ft) bgs in C6403..." There are no data reported for C6403 in Table N-5. The data for C6403 need to be added to table N-5 (Appendix N). Overall, Group P is fairly contaminated, with chromium, <sup>137</sup> Cs, <sup>241</sup> Am, and nitrite.	RFI	5	No text change required because C6403 is a logging location. The results for the Cs-137 peak are shown in Appendix T (logging results). Appendix N pertains to analytical data (sample locations). Regarding Am-241, Chromium, and Nitrate refer to Appendix N, and regarding Cs-137 refer to Appendices N and W. Am-241 was detected at one location and depth at P (C6394), depth 36-38 feet. Chromium was detected at 2 locations for P: C6394 having detections at 2 depths (36-38 feet) and C6406 having a detection at one depth (14-16 feet). Nitrate was detected at one location at depth at P (C6404), depth 42-44 feet. Cs-137 was detected at 4 of the 6 locations at various depths (surface to 43 feet).
ECY	5	5-123, line 20		"Additionally, IX in the vadose zone can significantly impact the mobility of some contaminants" Is "IX" defined?	RFI	5	No change required. It (ion exchange - IX) is defined on page xv in the Acronym list and when it is first used on page 3-11 line 29.

ECY	6	5-127, line 1 5-127, line 26  5-127, line 38 5-128, line 16 5-128, line 20 5-128, line 23 5-129, lines 9-11  5-129, line 22		<p>"maximum concentration was 30,600 J µg/kg from"</p> <p>"The maximum concentration was 101,000 U at Investigation Group P from a depth of 5 m (15 ft) bgs (shallow)."</p> <p>"...concentration was 110,000 M µg/kg at a depth of..."</p> <p>Also "The maximum reported concentration was 3.13 U pCi/g from Investigation Group P"</p> <p>"concentration was 9.45 U pCi/g from Investigation Group P"</p> <p>"Iodine-129 was detected in one sample at a concentration of 0.808 B pCi/g..."</p> <p>"maximum reported value was a non-detect result of 76 BYU pCi/g from Investigation Group L1+L2 at a depth of 35 m (115 ft) bgs (deep), however, the highest detected value was 53.5 Y pCi/g from Site U at a depth of 39 m"</p> <p>"The maximum concentration was 1.85 B pCi/g from"</p> <p>Typo?</p>	RFI	5	These are qualifiers (laboratory, review, and validation) and are defined in Appendix M (Tables M-7 through M-9).
Joe	76	Sept. 5.4, General Comment	Joe 8	<p>Some where in this section, it should be stated that the first groundwater monitoring well at WMA C was installed in 1982, and that a network wasn't complete until 1989. Thus, there was no groundwater monitoring at this site during the years of operation from 1945 until 1980. Please include.</p>	RFI	5 + GWSC	<p>Text will not be modified in Section 1 or Section 5 (refer to Joe 76); however, text will be added in Section 2.4.6.3 (Groundwater Monitoring Program): <b>2.4.6.3 Groundwater Monitoring Program.</b> The Hanford Groundwater Protection Program has extensively monitored the groundwater in and around WMA C as part of the 200-BP-5 OU. In addition, at WMA C groundwater monitoring is conducted for compliance with WAC 173-303-400 (and by reference 40 CFR 265, Subpart F) because WMA C is an HWMA (RCW 70.105) TSD unit. These regulations require monitoring to determine whether dangerous waste or dangerous waste constituents from the waste site have entered the groundwater. Data from groundwater monitoring wells are used to evaluate the 200-BP-5 OU. Groundwater monitoring at WMA C began in the early 1980s, and a RCRA groundwater monitoring program for WMA C was initiated in 1989. It is significant to note, however, that groundwater monitoring was not conducted for the bulk of the time that C Farm was used for operational purposes.</p> <p><b>RCRA Monitoring</b>          A-Between 1989 and 2001, the WMA C RCRA groundwater monitoring program for WMA C was initiated in 1989 (conducted pursuant to WHC-SD-EN-AP-012 (Rev. 0, followed by Rev. 1 in 1991)). <del>Through</del> Between 2001 and 2009, groundwater monitoring was conducted in accordance with PNNL-13024.</p>
Beth	2	RFI Chapter 5 p. 5-108, lines 1-7	Beth 3 through 19	<p>The document states "From the 55 constituents reviewed as part of the screening-level evaluation, only seven constituents were considered likely to be of interest for assessing the potential or cancer risks for noncancerous hazards or investigating potential groundwater contamination sources at WMA C." Other contaminants need to be considered. To resolve this comment, please address the following set of comments for the screening-level document (RPP-RPT-58297).</p>	RFI	5 + GWSC	<p><b>Discussion on Groundwater Screening Report:</b> RPP-RPT-58297, Screening-Level Evaluation of Groundwater Monitoring Data Collected in Vicinity of WMA C, was developed to support the WMA C Phase 2 RFI because the 200-BP-5 and 200-PO-1 Remedial Investigation (RI) reports had not been completed (i.e., WMA C Phase 2 RFI provided to Ecology 12/14 and RIs provided to Ecology 8/15). The BP-5 and PO-1 RI reports, which contain groundwater risk assessment information and identify those constituents from WMA C impacting groundwater, are now available, and this information will be summarized in the revised WMA C Phase 2 RFI. The screening report, which was developed to provide necessary groundwater information, will not be updated since the BP-5 and PO-1 RI reports will be used to support the revised WMA C Phase 2 RFI.</p> <p>Note that the information from this report was additionally used in various sections of the WMA Phase 2 RFI (e.g. Section 5, 6, and 7). Comments on this referenced information, contained in the WMA C Phase RFI, will be discussed in subsequent comment response meetings. It is anticipated that a majority of these comments will be resolved by indicating that the revised WMA C Phase 2 RFI will summarize information from BP-5 and PO-1, as appropriate.</p>
Damon	46	P 7-53, S 7.8.3, L 30-33		<p>Text states that 9524 records and 55 analytes in groundwater were carried forward (after data processing) for screening against human health comparison values. Data in Figure 7-8 slightly conflict with this.</p>	RFI	7 + GWSC	<p><b>Discussion on Groundwater Screening Report:</b> RPP-RPT-58297, Screening-Level Evaluation of Groundwater Monitoring Data Collected in Vicinity of WMA C, was developed to support the WMA C Phase 2 RFI because the 200-BP-5 and 200-PO-1 Remedial Investigation (RI) reports had not been completed (i.e., WMA C Phase 2 RFI provided to Ecology 12/14 and RIs provided to Ecology 8/15). The BP-5 and PO-1 RI reports, which contain groundwater risk assessment information and identify those constituents from WMA C impacting groundwater, are now available, and this information will be summarized in the revised WMA C Phase 2 RFI. The screening report, which was developed to provide necessary groundwater information, will not be updated since the BP-5 and PO-1 RI reports will be used to support the revised WMA C Phase 2 RFI.</p> <p>Note that the information from this report was additionally used in various sections of the WMA Phase 2 RFI (e.g. Section 5, 6, and 7). Comments on this referenced information, contained in the WMA C Phase RFI, will be discussed in subsequent comment response meetings. It is anticipated that a majority of these comments will be resolved by indicating that the revised WMA C Phase 2 RFI will summarize information from BP-5 and PO-1, as appropriate.</p>

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 Select Ecology Comments on WMA C RFI Report

Damon	47	P 7-53, S 7.8.3, L 35-38	There are likely more than 7 analytes of interest in groundwater (i.e., sulfate, V, Ni, nitrate, I-129, Tc-99, cyanide), considering FOD and exceedences of comparison and background values. At a minimum, additional analytes should include Sb, As, Co, Cu, and CCl4.	RFI	7 might impact 5 GWSC	<p><b>Discussion on Groundwater Screening Report:</b> RPP-RPT-58297, Screening-Level Evaluation of Groundwater Monitoring Data Collected in Vicinity of WMA C, was developed to support the WMA C Phase 2 RFI because the 200-BP-5 and 200-PO-1 Remedial Investigation (RI) reports had not been completed (i.e., WMA C Phase 2 RFI provided to Ecology 12/14 and RIs provided to Ecology 8/15). The BP-5 and PO-1 RI reports, which contain groundwater risk assessment information and identify those constituents from WMA C impacting groundwater, are now available, and this information will be summarized in the revised WMA C Phase 2 RFI. The screening report, which was developed to provide necessary groundwater information, will not be updated since the BP-5 and PO-1 RI reports will be used to support the revised WMA C Phase 2 RFI.</p> <p>Note that the information from this report was additionally used in various sections of the WMA Phase 2 RFI (e.g. Section 5, 6, and 7). Comments on this referenced information, contained in the WMA C Phase RFI, will be discussed in subsequent comment response meetings. It is anticipated that a majority of these comments will be resolved by indicating that the revised WMA C Phase 2 RFI will summarize information from BP-5 and PO-1, as appropriate.</p>
ECY	1	General Comment		RFI		What is the comment?