

## Distribution

## Unit Managers' Meeting: 300 Areas Remedial Action Unit/Source Operable Units

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<b>Administrative Record</b> .....	BHI (H0-09) 2 copies

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Please inform Michael Wetzler (372-9562) – BHI (H0-17)  
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Meeting Minutes Transmittal/Approval  
300 Area Unit Managers' Meeting  
Remedial Action and Waste Disposal Unit/Source Operable Unit  
3350 George Washington Way, Richland, Washington  
September 2002

103460

APPROVAL: Owen Robertson Date 10/21/02  
Owen Robertson, 300-FF-1 & 300-FF-2 Area Unit Manager, RL (A3-04)

APPROVAL: Kevin D. Leary Date 10/28/02  
Kevin Leary, 618-10 & 618-11 Area Unit Manager, RL (A6-38)

APPROVAL: Mike Thompson Date 10/22/02  
Mike Thompson, 300-FF-5 Area Unit Manager, RL (A6-38)

APPROVAL: John B. Price Date 10/28/02  
John B. Price, Cleanup Project Manager, WDOE (B5-18)

APPROVAL: Mike Goldstein Date 10/22/02  
Mike L. Goldstein, 300 Aggregate Area Unit Manager, EPA (B5-01)

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

Attachment 1	--	Agenda
Attachment 2	--	Attendance Record
Attachment 3	--	300 Area Meeting Minutes – September 17, 2002
Attachment 4	--	Previous Open Action Items Log
Attachment 5	--	Email Message Regarding Staging at 618-5, dated September 12, 2002
Attachment 6	--	618-5 Staging Piles
Attachment 7	--	Map of 300 Area 618-5 AOC Boundary
Attachment 8	--	§ 264.554 from 40 CFR Ch. I (7-1-01 Edition)

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Prepared by:

K. A. Anselm  
K. A. Anselm/ Michael Wetzler (H0-17)

Date 10/10/02

Concurrence by:

Vern Dronen  
Vern Dronen, Project Manager

BHI Remedial Action and Waste Disposal Project (H0-17)

Date 10/30/02

# UNIT MANAGERS MEETING AGENDA

103460

3350 GWW 1B45

September 17, 2002, 1:00 – 3:00 p.m.

## 300 Area

### **Administrative (1:00 – 1:15)**

- Action Item List
- Meeting minutes status
- Next UMM is September 17, 2002, 1:30 – 3:30, 3350 GWW (1B45)

### **300-FF-1 Remedial Action (1:00 – 1:15)**

- 618-4 Remediation Status
- Drum
- Soil/Debris

### **300-FF-2 (1:45 – 2:15)**

- Kd/Leach Study
- Uranium Conceptual Site Model
- Unrestricted Land Use
- 618-5 Staging Pile

### **300-FF-5 (2:15 – 2:45)**

- 300-FF-5 O&M Plan / SAP
- 300 Area Shoreline Study
- Plan for 300-FF-1 North and South Process Ponds

## **Meeting Minutes Schedule**

- Draft – 1 week
- Distribute – 1 Day
- Review – 1 week
- Incorporate – 1 week
- Finalize – Next UMM



**MEETING MINUTES  
REMEDIAL ACTION AND WASTE DISPOSAL  
UNIT MANAGER'S - 300 AREA  
Tuesday, September 17, 2002  
3350 GWW, 1B45, 1:30 – 3:30 P.M.**

**ADMINISTRATIVE**

- **Action Item List** - It was decided that all closed/completed action items should be removed from this list. Two open action items were discussed. Action Item #02-05, Spill Reporting White Paper requires review by Mike Goldstein (EPA). Mike Goldstein noted that he took no exception to, and supported, the concept presented in the submitted white paper, but has not yet reviewed the details. It was decided that a detailed review of this white paper is no longer required because it is not currently an issue, and this action item should be closed. If it becomes an issue of concern at a later time, it would be considered again. Action Item #02-08, provide treatability document to DOE and EPA, was closed immediately following the meeting when copies of the document were provided.
- **Meeting minutes status** - Minutes from the July 25, 2002, meeting are awaiting signature by Kevin Leary (DOE). Minutes from the August 21, 2002, meeting are awaiting signatures by Owen Robertson (DOE), Kevin Leary (DOE), Mike Thompson (DOE), and Mike Goldstein (EPA).
- **Next UMM** - The next UMM is Tuesday, October 22, 2002, 1:30-3:00, 3350 GWW (1B45). It was noted that there has been some confusion in the past regarding the time of this meeting. It should begin at 1:30 p.m. (not 1 p.m.) and end at 3:00 p.m.

**300 AREA REMEDIAL ACTION ITEMS**

- **618-4 Burial Ground** – It was reported that all drums are gone from the 618-4 Burial Ground. Stockpiles of land disposal restricted (LDR) material are being shipped out at a rate of 12 containers per day, and the projected completion date is in October. Side slopes and the excavation floor are being dressed up (over-excavated) as the stockpiles are loaded out. It was suggested that the site closeout sampling approach and strategy begin. Work activities supporting 618-4 Burial Ground remedial actions have been performed for eight months without a first aid case.
- **618-5 Burial Ground** – It is anticipated that remediation of the 618-5 Burial Ground will begin by the end of September. Mobilization began and a site walkdown was conducted on Monday, September 16, 2002. During excavation operations, the subcontractor plans to use a staging pile area to sort and stockpile material as authorized in the 300 Area Remedial Action Remedial Design Report/Remedial Action Work Plan (RDR/RAWP). EPA approval was obtained on the location of

staging pile areas to the area west and to the south of the 618-5 Burial Ground area of contamination (AOC) (Attachments 5-7) as required by the RDR/RAWP. EPA approval is required before using the staging pile area to the south of the AOC. In addition, EPA requested information on the public participation requirements. At a minimum it was recommended that the RDR/RAWP and UMM minutes, which are part of the administrative record, serve as the mechanism of having information available to the public (Attachment 8). However, it was also recommended that a remedial design fact sheet be prepared as discussed in the Superfund Guidance. EPA stated that the RDR/RAWP was sufficient and the Superfund Guidance also allows EPA the discretion to not require a fact sheet since the basis of staging piles constitutes a minor or insignificant change.

The basis for use of the staging pile area versus expansion of the AOC to cover the same area was also discussed. EPA expressed a preference for expansion of the AOC and stated they would contact EPA Region 10 for a basis to authorize expansion. This information is expected by the end of September. In the meantime, it was agreed that operations would proceed using the staging pile area. The remedial action subcontractor plans to use the area west of the AOC initially.

- ***Treatment of LDR Soil at the Environmental Restoration Disposal Facility (ERDF)*** – Large quantities of LDR (lead) soil were unearthed from the 618-4 Burial Ground. The ability to stage bulk LDR soil in the ERDF cell pending treatment would greatly increase productivity at the project sites. Currently, ERDF is able to treat 12 cans of LDR soil per day and the ERDF Record of Decision (ROD) does not authorize waste staging outside of containers. **John April will work with ERDF to develop a proposal for submittal to EPA that lists advantages and disadvantages of LDR waste staging options.**

**\*\*Action:** John April will work with ERDF to develop a proposal for submittal to Mike Goldstein (EPA) that lists advantages and disadvantages of LDR waste staging options.

### **300-FF-2 OPERABLE UNIT (300 AREA DESIGN AND ASSESSMENT) ITEMS**

- ***Kd/Leach Study and Uranium Conceptual Site Model*** – The Draft Kd Leach Study and the executive summary of the Draft Uranium Conceptual Site Model White Paper were transmitted to RL the week of August 26, 2002, for submittal to regulators for review. Comments are due two weeks after receipt of the documents. After receipt of review comments, it will be decided if a comment/resolution meeting will be needed. The work order is in place for Pacific Northwest National Laboratory (PNNL) to address comments and finalize the Kd/leach study.

Mike Goldstein mentioned that Mike Thompson (RL) has requested that PNNL prepare a presentation describing a general picture of the 300 Area groundwater. He indicated that someone should follow up with PNNL as to the topics of this presentation.

- ***Unrestricted Land Use/Agreement in Principle (AIP)*** – Mike Goldstein stated that an AIP is being prepared to describe the details for evaluation of 300 Area Unrestricted Surface Land Use Scenario. He also mentioned that he wants to add an evaluation of the final risk assessment/protectiveness for the 300 Area, similar to the B/C pilot study. Rich Carlson, Environmental Restoration Contractor (ERC), suggested that further discussion be held with RL regarding EPA's request to add the risk assessment task.
- ***300 Area Process Trenches*** – Ecology reported that temporary approval of the post-closure groundwater monitoring plan will revert back to the original plan this December. Recognizing that RL has not completed all the sampling and analysis needed to determine effectiveness of the temporary plan, Ecology is currently working to resolve the issue.

### **300-FF-5 OPERABLE UNIT ITEMS**

***Representatives from the Groundwater Program at DOE or Fluor Hanford were not available to provide status for these meeting minutes.***

### 300 Area Unit Manager Meeting Action Items Log

Action #	Action/Subject	Assigned To	Owed To	Assigned Date	Original Due Date	Adjusted Due Date	Date Complete	Status
02-01	Ted Poston (PNNL) Presentation on current 300 Area Shoreline Study for April UMM	Mike Thompson	April UMM	03/19/2002	04/16/2002		05/14/02	Presentation given by Ted Poston. Closed
02-02	Send draft Sitewide Institutional Controls Plan comments to RL to forward to EPA.	Ella Feist	Mike Goldstein	04/16/2002			5/14/02	ERC provided to DOE. Ella Coenenberg (ERC) sent the draft of the comments on the Sitewide Institutional Controls Plan to John Sands (DOE), who will forward to Mike Goldstein (EPA). Rich Carlson (ERC) to do follow-up.
02-04	Send 618-4/5 Readiness Assessment presentations to RL to forward to EPA.	John April	Mike Goldstein Bob McLeod	04/16/2002			5/14/02	Closed. Readiness Assessment presentations for 618-4 and 618-5 Burial Grounds sent to Bob McLeod (DOE) and Mike Goldstein (EPA) via email on 5/1/2002.
02-05	Spill Reporting White Paper requires review by Mike Goldstein (EPA).	Mike Goldstein	Jeff Lerch	04/16/2002				
02-06	EPA Response to State of Oregon	Bryan Foley	Mike Goldstein	04/16/2002			5/14/02	EPA Response to State of Oregon – Bryan Foley (DOE) forwarded to Mike Goldstein (EPA); Mike Thompson (DOE) also has a groundwater related response that he will provide to Mike Goldstein (EPA).
02-08	Provide treatability document to DOE and EPA.	Rich Carlson	Owen Robertson Mike Goldstein	08/21/2002				

-----Original Message-----

From: Goldstein.Mike@epamail.epa.gov  
[mailto:Goldstein.Mike@epamail.epa.gov]  
Sent: Thursday, September 12, 2002 5:49 PM  
To: Lerch, Jeffrey A  
Cc: Duranceau, David A; April, John G; Donnelly, Jack W;  
BLVedder@mail.bhi-erc.com; Einan.David@epamail.epa.gov  
Subject: Re: FW: Staging at 618-5

Jeff,

With this sentence added, I concur with everything in the "controls" section except the first sentence of the last bullet. My issue is that the purpose of the biased and random sampling is not to verify "compliance with cleanup objectives," but rather to verify "that the staging area is clean (i.e., has not been contaminated through use) and therefore does not require any long-term institutional controls." This is especially relevant to this location as it has been certified as "clean closed" with respect to chemicals via the RCRA closure process.

Also, with regard to the e-mail Jack sent out that describes the rationale for why we are using the staging pile regulations as opposed to simply expanding the area of contamination, I am curious to hear Bechtel's interpretation of how the requirements outlined in 264.554 for "closing" a staging pile sited in an uncontaminated area (which cites sections 264.258(a) and 264.111) and public notification are being met as well.

That being said, I have no problem with you proceeding to use the designated staging pile areas using the language contained in the controls section of this draft (with the exception noted above). If we modify the rationale or other language in the RDR/RAWP as a result of the other questions I have asked, it will not affect my approval of the procedure you have outlined in this attachment (except as noted).

If you have any questions about this, call me at 376-4919.

Mike

## 618-5 STAGING PILES

### BACKGROUND

The Remedial Design Report/Remedial Action Work Plan (RDR/RAWP) for the 300 Area (DOE/RL-2001-47, Rev. 0), Section 4.4.2, contains the requirements for managing staging piles in accordance with 40 Code of Federal Regulation (CFR) 264.554. The U.S. Environmental Protection Agency (EPA) approved the RDR/RAWP, which provided general authorization to operate staging piles during remediation of the 300-FF-2 Operable Unit (OU). In addition, the RDR/RAWP requires EPA approval of staging pile locations.

Use of staging piles has many potential benefits including increasing operational efficiency and providing an added margin of safety for workers through reduced congestion within the AOC. These benefits will help contribute to avoiding negative impacts to the baseline schedule and budget.

### STAGING PILE LOCATIONS

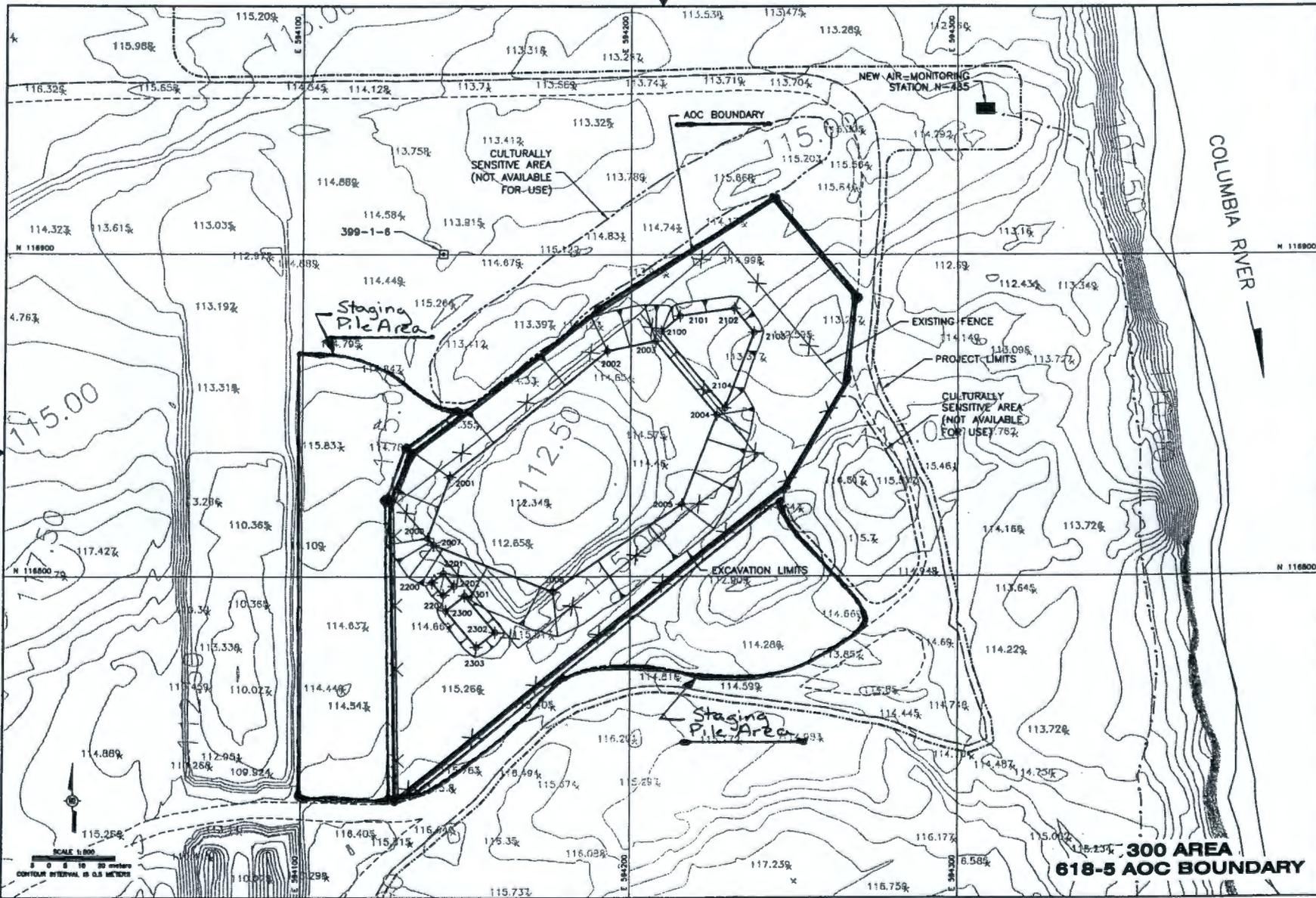
Attached is a map of the staging pile areas for the 618-5 burial ground. There are two primary staging areas; one west of the 618-5 burial ground and one south of the 618-5 burial ground. Within the staging pile areas, staging piles will be placed that are within the contiguous property of 300-FF-2 OU and adjacent to the 618-5 Area of Contamination (AOC).

### CONTROLS

The following controls will be implemented to ensure compliance:

- The staging pile area will be surrounded with a minimum of a 15-centimeter (6-inch) berm to control run-on/run-off control prior to use.
- The staging pile area to the west of 618-5 burial ground will be utilized first and EPA approval will be obtained prior to using the area to the south of 618-5 burial ground.
- Dust control practices will be deployed consistent with soil piles managed in the AOC, including the use of crusting agents, as necessary, to minimize migration/leaching of contaminants into underlying soil.
- Surveys of the staging pile area will be performed prior to placement to ensure no cross-media transfer and staging waste on previously contaminated areas.
- Without prior approval from EPA, the staging pile area will not be operated more than 2-years from the date the first staging pile is placed in the staging pile area. It is expected the work will be completed within 2-years. The Unit Managers Meeting will be the forum to identify the start date.
- Gross sorting of waste will be performed within the AOC to identify and remove drums or other containers from the bulk soil prior to moving the soil to the staging piles.

- Additional sorting may be required on bulk soil in the staging pile area. Any dangerous waste identified will be packaged and managed appropriately (drums) within the staging pile area and within close proximity to the specific staging pile. Drums will be properly labeled, managed, and inspected and should be transported for disposal or treatment as soon as practicable. Dangerous waste (drummed) must be inspected weekly or as described in BHI-EE-10.
- Following removal of the staging piles, bias and random samples will be collected consistent with the Sampling and Analysis Plan (SAP) (DOE/RL-2001-48) to verify compliance with cleanup objectives. Bias samples will be collected at locations where staging piles existed and will be analyzed for constituents that were present in the associated staging piles. For random samples, the staging pile area shall be considered a shallow zone decision unit in accordance with the SAP. The decision unit will be divided into subunits based on size and the prescribed number of random verification samples will be collected (Table 3-3), excluding any general areas that were unused during operation of the staging pile area. Verification samples will be analyzed for the site Contaminates of Concern (COCs) and results will be compared with the 300-FF-2 cleanup levels and documented in the Cleanup Verification Package (CVP) to demonstrate that remedial action objectives have been achieved. The closeout approach for the staging pile area will be presented and agreed to in a UMM.



## § 264.554

## 40 CFR Ch. I (7-1-01 Edition)

(3) You must not pile remediation waste on the same base where incompatible wastes or materials were previously piled, unless the base has been decontaminated sufficiently to comply with § 264.17(b).

(g) *Are staging piles subject to Land Disposal Restrictions (LDR) and Minimum Technological Requirements (MTR)?* No. Placing hazardous remediation wastes into a staging pile does not constitute land disposal of hazardous wastes or create a unit that is subject to the minimum technological requirements of RCRA 3004(o).

(h) *How long may I operate a staging pile?* The Director may allow a staging pile to operate for up to two years after hazardous remediation waste is first placed into the pile. You must use a staging pile no longer than the length of time designated by the Director in the permit, closure plan, or order (the "operating term"), except as provided in paragraph (i) of this section.

(i) *May I receive an operating extension for a staging pile?* (1) The Director may grant one operating term extension of up to 180 days beyond the operating term limit contained in the permit, closure plan, or order (see paragraph (i) of this section for modification procedures). To justify to the Director the need for an extension, you must provide sufficient and accurate information to enable the Director to determine that continued operation of the staging pile:

(1) Will not pose a threat to human health and the environment; and

(1) Is necessary to ensure timely and efficient implementation of remedial actions at the facility.

(2) The Director may, as a condition of the extension, specify further standards and design criteria in the permit, closure plan, or order, as necessary, to ensure protection of human health and the environment.

(j) *What is the closure requirement for a staging pile located in a previously contaminated area?* (1) Within 180 days after the operating term of the staging pile expires, you must close a staging pile located in a previously contaminated area of the site by removing or decontaminating all:

(1) Remediation waste;

(ii) Contaminated containment system components; and

(iii) Structures and equipment contaminated with waste and leachate.

(2) You must also decontaminate contaminated subsoils in a manner and according to a schedule that the Director determines will protect human health and the environment.

(3) The Director must include the above requirements in the permit, closure plan, or order in which the staging pile is designated.

(k) *What is the closure requirement for a staging pile located in an uncontaminated area?* (1) Within 180 days after the operating term of the staging pile expires, you must close a staging pile located in an uncontaminated area of the site according to §§ 264.258(a) and 264.111; or according to §§ 265.258(a) and 265.111 of this chapter.

(2) The Director must include the above requirement in the permit, closure plan, or order in which the staging pile is designated.

(l) *How may my existing permit (for example, RAP), closure plan, or order be modified to allow me to use a staging pile?*

(1) To modify a permit, other than a RAP, to incorporate a staging pile or staging pile operating term extension, either:

(i) The Director must approve the modification under the procedures for Agency-initiated permit modifications in § 270.41 of this chapter; or

(ii) You must request a Class 2 modification under § 270.42 of this chapter.

(2) To modify a RAP to incorporate a staging pile or staging pile operating term extension, you must comply with the RAP modification requirements under §§ 270.170 and 270.175 of this chapter.

(3) To modify a closure plan to incorporate a staging pile or staging pile operating term extension, you must follow the applicable requirements under § 264.112(c) or § 265.112(c) of this chapter.

(4) To modify an order to incorporate a staging pile or staging pile operating term extension, you must follow the terms of the order and the applicable provisions of § 270.72(a)(5) or (b)(5) of this chapter.

(m) *Is information about the staging pile available to the public?* The Director

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**Environmental Protection Agency****§264.571**

must document the rationale for designating a staging pile or staging pile operating term extension and make this documentation available to the public.

[63 FR 65939, Nov. 30, 1998]

**Subparts T-V [Reserved]****Subpart W—Drip Pads**

SOURCE: 56 FR 30196, July 1, 1991, unless otherwise noted.

**§264.570 Applicability.**

(a) The requirements of this subpart apply to owners and operators of facilities that use new or existing drip pads to convey treated wood drippage, precipitation, and/or surface water run-off to an associated collection system. Existing drip pads are those constructed before December 6, 1990 and those for which the owner or operator has a design and has entered into binding financial or other agreements for construction prior to December 6, 1990. All other drip pads are new drip pads. The requirement at §264.573(b)(3) to install a leak collection system applies only to those drip pads that are constructed after December 24, 1992 except for those constructed after December 24, 1992 for which the owner or operator has a design and has entered into binding financial or other agreements for construction prior to December 24, 1992.

(b) The owner or operator of any drip pad that is inside or under a structure that provides protection from precipitation so that neither run-off nor run-on is generated is not subject to regulation under §264.573(e) or §264.573(f), as appropriate.

(c) The requirements of this subpart are not applicable to the management of infrequent and incidental drippage in storage yards provided that:

(1) The owner or operator maintains and complies with a written contingency plan that describes how the owner or operator will respond immediately to the discharge of such infrequent and incidental drippage. At a minimum, the contingency plan must describe how the owner or operator will do the following:

(i) Clean up the drippage;

(ii) Document the cleanup of the drippage;

(iii) Retain documents regarding cleanup for three years; and

(iv) Manage the contaminated media in a manner consistent with Federal regulations.

[56 FR 30196, July 1, 1991, as amended at 57 FR 61502, Dec. 24, 1992]

**§264.571 Assessment of existing drip pad integrity.**

(a) For each existing drip pad as defined in §264.570 of this subpart, the owner or operator must evaluate the drip pad and determine that it meets all of the requirements of this subpart, except the requirements for liners and leak detection systems of §264.573(b). No later than the effective date of this rule, the owner or operator must obtain and keep on file at the facility a written assessment of the drip pad, reviewed and certified by an independent, qualified registered professional engineer that attests to the results of the evaluation. The assessment must be reviewed, updated and re-certified annually until all upgrades, repairs, or modifications necessary to achieve compliance with all of the standards of §264.573 of this subpart are complete. The evaluation must document the extent to which the drip pad meets each of the design and operating standards of §264.573 of this subpart, except the standards for liners and leak detection systems, specified in §264.573(b) of this subpart.

(b) The owner or operator must develop a written plan for upgrading, repairing, and modifying the drip pad to meet the requirements of §264.573(b) of this subpart, and submit the plan to the Regional Administrator no later than 2 years before the date that all repairs, upgrades, and modifications are complete. This written plan must describe all changes to be made to the drip pad in sufficient detail to document compliance with all the requirements of §264.573 of this subpart. The plan must be reviewed and certified by an independent qualified registered professional engineer.

(c) Upon completion of all upgrades, repairs, and modifications, the owner