

MEETING NOTES**Waste Management Area C HFFACO Appendix I Performance Assessment
BRA Comment Resolution**

MEETING DATE: November 27, 2017

LOCATION: Ecology Conference Room 3C, Richland, WA

ATTENDEES:

Alaa Aly (Intera)	Jeff Lyon (Ecology)
Marcel Bergeron (WRPS)	Beth Rochette (Ecology)
Jan Bovier (ORP)	Paul Rutland (WRPS)
Dib Goswami (Ecology)	Kristin Singleton (WRPS)
On the Phone: Damon Delistraty	
Mahmud Rahman (Intera)	
Scott Van Verst	

PURPOSE:

The purpose of this meeting was to discuss category 1 & 2 comment responses to RPP-RPT-58329, Rev. 1, Baseline Risk Assessment for Waste Management Area C.

Comment responses are categorized into four groups as follows:

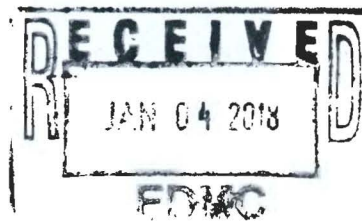
1. Concur with comment and plan to make recommended change or changes(s)
2. Generally concur with comment but need more discussion about Ecology's comment and proposed response before final disposition
3. Generally disagree with comment but need more discussion about Ecology's comment and proposed response before final disposition
4. Disagree with comment; response gives basis for disagreement.

The most current review comment response (RCR) form was displayed electronically during the meeting.

STATUS OF PRIOR MEETING NOTES: Meeting notes for October 31, 2017 have been submitted to the administrative record, and meeting notes from November 8, 2017 are with Ecology for review.

QUESTIONS/DISCUSSION:

- The attendees tentatively agreed to the proposed resolutions for the following comments from the WMA C BRA, Rev. 1:
 - Meeting 01: BRAES-3, BRAES-4, BRA3-4, BRA3-6, BRA3-9, BRA3-24, BRA3-29, BRA3-30, BRA3-34, BRA3-35, BRA3-42, BRA4-1, BRA4-2, and BRA4-5.
 - Meeting 02: BRA3-33, BRA3-40, BRA3-53, and BRA5-2.



- The attendees tentatively agreed to the following changes to proposed resolutions pending incorporation into the revised WMA C BRA Report:
 - BRA3-5 and BRA3-39: Additional language will be added to Chapter 3 Introduction, indicating the Chapter is about HH direct contact, and groundwater protection is evaluated in Section 3.5.11. Table captions for Tables 3-1 and 3-2 will be modified indicated they are for shallow zone soil for direct contact evaluations.
 - BRA4-11: Provide a new disposition. Change dose limits.
 - BRA4-21: Provide new disposition. Delete text that references CHRPC-00651.
 - BRA2-1: Change disposition based on RCR recommendation. Add text to identify ranges of depths and numbers of samples.
 - BRA4-9: Provide a new disposition. Provide a comparison between the utilized TRVs vs those listed in WAC Table 749-5. Identify differences and provide rationale for discrepancies.
 - BRA3-21, 2-3, and 2-4: Update disposition to state that values with “U” flag are forwarded to the ProUCL for calculations. For example, sample XYZ has contaminant recorded at 0.123U. This value is provided for the proUCL software as input and is used in the calculation of 95th UCLs.
- Ecology will discuss internally the following comments: BRAES-2, BRA1-1, BRA3-10, BRA3-20, BRA4-25 (Damon).
- Attendees discussed the following:
 - BRA2-2: While Ecology had previously agreed on the sampling design per an Ecology approved Work Plan. B. Rochette has stated that the work plan did not include data analysis and statistical methods for the samples, and judgmental sampling locations should not be used to calculate UCLs.

The Rev. 00 of BRA a secondary reference document was reviewed roughly by Ecology during the same time period as our review of the WMA C RFI, and comments were then submitted by Ecology in 2015. These comments were addressed through a comment resolution process, with multiple meetings and discussions of each individual comment until resolution is achieved or differences in approach identified. Through this process, four areas of differences were identified and these issues are clearly stated in the Introduction Section of the Rev. 01. B. Rochette has indicated that she did not participate in the review of the Rev. 00 BRA because it was a secondary document with subordinate status, due to time constraints. As part of the WMA C PA, this is now a primary document and Ecology added additional reviewers given the primary status of the document.

D. Delistraty has suggested the BRA team review WAC 173-340-740(7)(d)(iii) as relevant regulatory guidance supporting Ecology’s position on comparing individual sample results against the pertinent thresholds (See status details on BRA2-2)

EXPECTATIONS, AGREEMENTS, AND ACTIONS: Refer to the tables below.

NEXT MEETING:

Monday, December 4, 2017

2:00-3:30 pm

(Reoccurring Mondays)

JAN BOVIER
DOE Project Manager (print)

Jan Bovier
DOE Project Manager (signature)

12/11/17
Date

Jeffery Lyan
Ecology Project Manager (print)

Jeffery Lyan
Ecology Project Manager (signature)

12/11/17
Date

See note change below

DATE	EXPECTATION
10/31/2017	All BRA commenters commit to the comment response schedule.

DATE	AGREEMENTS
10/31/2017	Risk information regarding UPR-200-E-81 -82, and -86 will be added to the BRA as an appendix.

ACTIONS			
Action Number	Actionee	Description	Status
2017-10-31-1	Beth	Ecology will send responses to categories 1 & 2 comment responses by Tuesday November 7 th .	Closed (11/7/2017)
2017-11-8-1	Mahmud	Draft a new RCR disposition for comment number BRA1-1	Closed (11-27-2017)
2017-11-8-2	Beth	Ecology is to discuss amongst themselves, and then provide a position on the appropriateness of ProUCL for 95UCL calculations. <i>for Vadose zone data</i>	In progress
2017-11-27-1	Beth	Ecology is to discuss internally and have a new meeting about BRA1-1 and BRA3-10.	New
2017-11-27-2	Damon	Provide thoughts on BRA4-25	New
2017-11-27-3	Marcel	Provide Ecology with kd references for Cadmium	New
2017-11-27-4	Marcel/Alaa	Review WAC 173-340-740(7)(d)(iii)	New