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**Meeting Minutes Transmittal/Approval**
**Hanford Project Managers' Meeting**
**Richland, Washington**
**August 2, 1994**

From/
Appvl.: _____ Date: 8/25/94
Steven H. Wisness, RL
Hanford Project Manager

Appvl.: Douglas R. Sherwood as amended Date: 8/25/94
Douglas R. Sherwood, EPA
Hanford Project Manager

Appvl.: Roger F. Stanley Date: 8/25/94
Roger F. Stanley, Ecology
Director, Tri-Party Agreement Implementation

Prepared by
Appvl.: Frank T. Calapristi Date: 8/25/94
Frank T. Calapristi
Westinghouse Hanford Company

**DISTRIBUTION**

| | | |
|---|---|---|
| S. Alexander | Ecology | N1-05 |
| L. D. Arnold | WHC | B2-35 |
| A. V. Beard | DOE | S7-55 |
| P. J. Bengtson | WHC | B3-35 |
| F. T. Calapristi | WHC | B2-35 |
| A. S. Carlson | WHC | A5-15 |
| C. DeFigh-Price | WHC | S7-30 |
| T. F. Demmitt | BHI | H4-70 |
| J. W. Donnelly | Ecology | N1-05 |
| V. R. Dronen | BHI | A5-56 |
| J. A. Eacker | WHC | L6-04 |
| G. R. Eidam | BHI | H4-79 |
| D. A. Faulk | EPA | B5-01 |
| B. L. Foley | DOE | A5-19 |
| R. D. Freeberg | DOE | A5-19 |
| R. E. Gerton | DOE | S7-54 |
| E. D. Goller | DOE | A5-19 |
| R. S. Hajner | BHI | 450 Hill St. |
| R. P. Henckel | BHI | H6-02 |
| N. T. Hepner | Ecology | N1-05 |
| R. G. Holt | DOE | A5-15 |
| N. Kimball | DOE | A5-19 |
| S. D. Liedle | BHI | H4-79 |
| D. Lundstrom | Ecology | N1-05 |
| N. M. Menard | WHC | H6-25 |
| S. V. Moore | Ecology | N1-05 |
| R. D. Morrison | WHC | B2-35 |
| S. Morton | BHI | 450 Hills St. |
| D. C. Nylander | Ecology | N1-05 |
| K. J. Oates | USACE | A5-20 |
| J. E. Rasmussen | DOE | A5-15 |
| S. Robinson | DOE-HQ | EM-44 |
| B. Scheck | Dames & Moore | G1-01 |
| D. R. Sherwood | EPA | B5-01 |
| R. F. Stanley | Ecology | Olympia |
| D. D. Teel | Ecology | N1-05 |
| K. M. Thompson | DOE | A5-15 |
| P. W. Willison | DOE | A4-52 |
| S. H. Wisness | DOE | A5-15 |
| J. F. Woolard | BHI | H6-05 |
| T. A. Wooley | Ecology | N1-05 |
| J. K. Yerxa | DOE | A5-15 |
| EDMC | WHC | H6-08 |

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**Hanford Project Managers' Meeting**
**August 2, 1994**
**Project Managers (PMs): Doug Sherwood, Roger Stanley, Jon Yerxa for Patrick Willison**
**WHC Tri-Party Agreement Integration: Larry D. Arnold**
**Recorder: Frank T. Calapristi**

1. **Review of Past Action Items (+ Frank Calapristi)**

The Open Action Items list was reviewed by the Project Managers and updated (Attachments 1 and 1A)

2. **New Approach to Characterization (+ R. Gerton)**

Ron Gerton (DOE-RL) made the presentation (Attachment 2) and emphasized this is a "heads-up" proposal and no decisions have been made. Further evaluation is required to assess its feasibility. In the presentation, Ron suggested three tank classifications: Safe, Conditionally Safe and Unsafe. Ron then described the process for screening the tanks and the required action to be taken. The action taken will include a decision on tank sampling.

Roger Stanley (Ecology) asked if this approach was not considered last year; with the factions of pre-treatment, disposal, safety, etc to be included in a DQO process. Ron Gerton responded this proposal is a result of the DQO process.

Doug Sherwood asked: when evaluating the tanks, it is possible to list those tanks with identified constituents, to establish trends and/or evaluate the probability of constituents in other tanks. This would also help determine what is important in pre-treatment. Cherri Defigh-Price (WHC) said this tank data is available and the information will be provided.

3. **Public Involvement (+ A. Carlson)**

Annette Carlson (WHC) opened the discussion and distributed a draft Public Involvement Calendar (Attachment 3A). Roger Stanley asked about Indian Tribal involvement and how this would affect the calendar dates. After a short discussion, Annette requested an Ecology position on tribal involvement in time to issue a 30 notice for the Public Involvement period, which is scheduled to start September 20, 1994. After the discussion was completed, Annette distributed a copy of "Process for Developing a TPA Public Involvement Strategy" by Triangle Associates (Attachment 3B) for Project Managers information.

**4. Change Requests (+ R. Morrison)**

The following Change Request was approved:

- M-15-94-07: Establish 100-HR-2 Interim Milestones (Attachment 4A)

The following Change Requests were discussed but the Project Managers deferred approval to a later date.

- C-93-08: Incorporate HCP into the 100-NR-1 (Attachment 4B)
- M-35-94-01: Modification of Milestones M-35-02, M-35-03 and M-35-04 (Attachment 4C)

Ron Morrison distributed a copy of "Guidelines for Use of Class III Change Packages" (Attachment 4D) and asked the Project Managers to review the document for currency.

**5. Issue Resolution (+ D. Lindsey, J. Rasmussen)**

Jim Rasmussen (DOE-RL) opened the discussion and provided justification for initiating the Issue Resolution process (Attachment 5) on the 300 Area Treated Effluent Disposal Facility (TEDF). The issue concerns the obtaining of a NPDES permit from EPA that can be compiled based on Best Available Technology (BAT) and obtaining a land lease from the State of Washington for operating the 300 Area outfall piping.

DOE said they have a 18 million dollar treatment plant ready to go on line by December 31, 1994 (Milestones M-17-00 and M-17-09); however, the plant will experience a 6-9 month delay if DOE must appeal existing legal and regulatory requirements. DOE also stated they must reach a resolution with EPA and Ecology (a permit must be in hand) by September 11th or a change request will be required to change the completion date to "TBD".

After some additional discussion, the three parties agreed to the following plan:

1. EPA will send a letter to DOE on the 401 certification.

2. DOE will attach the certification, as a permit limit, and modify the Issue Resolution Worksheet.

3. Steps one and two above, will be completed within 2 days.

4. DOE will transmit the revised Issue Resolution worksheet to the TPA Project Managers by cc:mail.

5. EPA will forward the documentation to senior EPA management at Region X.

6. **Environmental Restoration Disposal Facility (ERDF) Siting and Related Resource Issues (+ R. Holt)**

Bob Holt (DOE-RL) reported the trustees believe they were not consulted properly before the siting decision, which will have an impact on the scrubstep habitat. Doug Sherwood (EPA) said a discussion on the site selection process was provided to the trustees during the preliminary scoping meetings; written comments were received and response comments were provided.

During the subsequent discussion, DOE said a letter is being drafted, for signature by the trustees, defining natural resource values the trustees would like to see in future cleanup activities. However, EPA believes some of the trustees had an abrupt change of philosophy and a meeting with the Fish and Wildlife Service is required to clarify the respective positions. The week of August 15 was set up for a tentative meeting schedule.

**Note: Because of time limitations, discussion on the following two topics was deferred to 8:00 a.m. Tuesday, August 9th.** Prior to the meeting adjournment, the documents "Development of Alternatives for Solid Waste" (Attachment 6A) and "ROD Working Group Meeting Agenda" (Attachment 6B) were provided to EPA for review before the August 9th meeting.

1. ROD and Permit Modification Strategy/100 Area Cleanup Decision (D. Sherwood, P. Willison, R. Stanley, E. Goller, M. Wollin)

   - Establishment of Unit Managers Working Group
   - List of Alternatives

2. 100-DR-1 Soil Washing Change Package/ M-15-94-05 (P. Willison, D. Sherwood, R. Stanley, E. Goller, M. Wollin)

**August 9, 1994**

The Project Managers meeting reconvened in the Benton-Franklin Room of the Richland Red Lion to complete discussion of the above two items. The discussion was opened by Eric Goller (DOE) and the initial topic was the "100-DR-1 Soil Washing Change Package". However, the discussion being closely related to the "Rod and Permit Modification Strategy," included both topics.

Eric Goller distributed a copy of a May 13th letter from DOE to EPA and Ecology (Attachment 7A), requesting a seven month schedule extension of TPA milestone M-15-07B; under the Force Majeure provision of the TPA. Eric discussed the change request and said we need agreement by the end of the month and suggested we do this by red-lining the change request. However, others suggested the meeting scope be limited to obtaining general agreements.

Bob Scheck (Dames & Moore) made a presentation on the 100 Area Soil Washing Bench Tests; which included a flowsheet model for soil remediation. DOE said they will need a pilot scale testing program to support design of a production system for

remediation. However, Doug Sherwood (EPA) said they were concerned about cost benefits of soil washing. The costs are very high and remediation will take seven years. EPA's basic question is: How can DOE scale the tests up and provide good cost estimates, including alternatives? Eric said the Record of Decision (ROD) working group will address the questions raised by EPA.

EPA also had a concern about the strategy for cleaning all of the waste sites, which did not include characterization of all sites but is relying on historical data for some. There was a lengthy discussion at this point and EPA made the following comments.

1. DOE should reevaluate its approach for addressing contaminants in small sites since this strategy will leave small pockets of contaminated material in low priority sites.

2. Cleanup standards for large sites should be applied to small sites.

3. DOE should address not only the high priority sites but also all risk generating sites.

4. Need a DOE commitment to reduce the major risk drivers along the Columbia River.

The group discussed the published schedule for cleaning up BC-1 waste sites and EPA questioned why the high priority site were not being worked on until after the year 2000. DOE said their approach was to start a learning curve on less contaminated sites before cleaning up the more contaminated ones. EPA said they did not interpret the document that way. EPA also stated the proposed plan does not address the sites that were negotiated for clean up.

The milestone schedule issue was restated and DOE said this must be resolved. EPA requested DOE to provide the following information before the issue can be resolved:

1. What are the DQO objectives for doing additional soil washing; particularly the basis for cost benefits to operate the soil washing equipment?

2. What are the clean up standards?

3. What information is needed for the ROD?

DOE added any impact to the ERDF should also be considered.

EPA asked about the completeness of the Administrative Records (AR). Doug asked for a schedule for issuing ROD supporting documents and wanted to review the documents prior to transmittal to the AR.

The discussion then focused on a new schedule for the 100-DR-1 Plot Program Soil Washing (Attachment 7B), which is a change to the May 13 DOE letter. This led into a summary of actions by DOE and the contractors:

1. DOE and its contractors will discuss with the regulators, the uncertainties and cost estimates for scaling up from bench scale to full scale production of soil washing.

2. The staff of the three parties will meet today to discuss and decide what is necessary for a full suite of soil washing activities; necessary to support the RDRA process in the 100 Area and land use decision.

3. A revised change request will be issued on August 22 reflecting results of the above actions.

4. Assure all documents are in the AR to support the ROD and are transmitted to the regulators and tribes.

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**AGENDA (REVISED 8/1/94)***

TRI-PARTY AGREEMENT PROJECT MANAGERS MEETING

TUESDAY, AUGUST 2, 1994

TWRS OFFICE BLDG (Room G206)
200 EAST AREA

1:00 pm REVIEW OF PAST ACTION ITEMS-- ATTACHMENT 1 (F. CALAPRISTI)

1:15 pm NEW APPROACH TO CHARACTERIZATION
(P.WILLISON, R.STANLEY, D.SHERWOOD, R.GERTON, F.CALAPRISTI)

2:00 pm PUBLIC INVOLVEMENT
(J.YERXA, J.BRECKEL, L.DAVIES, D.A.FAULK, A.CARLSON)

- o ER Refocus Public Meetings and Public Comment Period
- o Public Involvement Strategy

2:30 pm CHANGE REQUESTS (P.WILLISON, D.SHERWOOD, R.STANLEY, R.MORRISON)

- o Approval
  - o M-15-94-07: Establish 100-HR-2 Interim Milestones
  - o C-93-08: Incorporate HGP into the 100-NR-1

* o Discussion
  - o M-35-00: Data Management

2:45 pm BREAK

3:00 pm ISSUE RESOLUTION-- 300 AREA NPDES PERMIT (M-17-09)
(D. SHERWOOD, P. WILLISON, R. STANLEY, D. BRYSON, S. GODFREY)

3:30 pm ERDF SITING RESOURCE ISSUES
(D. SHERWOOD, P. WILLISON, R. STANLEY, R. HOLT, M. WOLLIN)

4:00 pm ROD AND PERMIT MODIFICATION STRATEGY/100 AREA CLEANUP DECISION
(D. SHERWOOD, P. WILLISON, R. STANLEY, E. GOLLER, M. WOLLIN)

- o Establishment of Unit Managers Working Group
- o List of Alternatives

4:45 pm * 100-DR-1 SOIL WASHING CHANGE PACKAGE/ M-15-94-05
(P. WILLISON, D. SHERWOOD, R. STANLEY, E. GOLLER, M. WOLLIN)

5:30 pm ADJOURN

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# ATTENDEES

## TPA PROJECT MANAGERS MEETING

AUGUST 2, 1994

TWRS OFFICE BLDG. (ROOM G206)
200 EAST AREA

| NAME | ORGANIZATION | MAILSTOP |
|---|---|---|
| F. CALAPRISTI | WHC/TPA | B2-35 |
| R. ARNOLD | WHC/TPAI | B2-35 |
| S. Alexander | Ecology - Kenn | |
| J. YERXA | DOE - RL | A5-15 |
| Dennis Faulk | EPA | B5-01 |
| Roger Stanley | Ecology | |
| Dave Lundstrom | Ecology | |
| James E Rasmussen | DOE-RL | A5-15 |
| Doug Sherwood | EPA | B5-01 |
| Dave Nylander | Ecology | Kennewick |
| Donald E Sutton | U.S. DOE RL | ? |
| Peter Bunton | WHC/PI | B3-35 |
| RD MORRISON | WHC/TPAI | B2-35 |
| C. Defigh-PRICE | WHC/TWRS | |

9513338.1380

## ATTENDEES

TPA PROJECT MANAGERS MEETING

AUGUST 2, 1994

TWRS OFFICE BLDG. (ROOM G206)
200 EAST AREA

| NAME | ORGANIZATION | MAILSTOP |
|---|---|---|
| Annette Carlson | WHC/DOE | A5-15 |
| Roger Freeberg | DOE-RL | |
| Eric Goller | DOE-RL | A5-19 |
| Bob Scheck | Dames & Moore | G1-01 |
| Nicole Kimball | DOE-RL | A5-19 |
| Greg Eidam | Bechtel | H4-79 |
| Tom Demmitt | Bechtel | H4-79 |
| Steve Morton | Bechtel | H4-79 |
| Steve Liede | Bechtel | H4-79 |
| Verne Dronen | Bechtel | |
| Nina Menard | WHC | H6-25 |
| Joel Eacker | WHC | L6-04 |
| Anna Beard | DOE-RL | S7-55 |
| Bob Holt | DOE-RL | A5-15 |

9513338.1381

## ATTENDEES

TPA PROJECT MANAGERS MEETING

AUGUST 2, 1994

TWRS OFFICE BLDG. (ROOM G206)
200 EAST AREA

| NAME | ORGANIZATION | MAILSTOP |
|---|---|---|
| Bryan Foley | DOE-RL | A5-19 |
| Robert Henckel | BHI | H6-02 |
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**ATTENDEES**

**TPA PROJECT MANAGERS MEETING**

AUGUST 9, 1994
(CONTINUATION OF 8/2/94 MEETING)

RICHLAND RED LION
BENTON-FRANKLIN ROOM

| NAME | ORGANIZATION | MAILSTOP |
|---|---|---|
| F.T. CALAPRISTI | WHC/TPAI | B2-35 |
| R.P. HENCKEL | BHI | H6-02 |
| J.G. WOOLARD | BHI | H6-05 |
| S.G. Morton | BHI | 450 Hills St |
| R.S. HAJNER | BHI | 450 Hills St. |
| Dennis Faulk | EPA | B5-01 |
| Chuck Cline | Ecology | — |
| Jack Donnelly | Ecology | kennewick |
| Dave Teel | Ecology | kennewick |
| Steve Alexander | Ecology | Kennewick |
| Eric Goller | RL | A5-19 |
| Bob Scheck | Dames + Moore | G1-01 |
| K. Michael Thompson | DOE | A5-15 |
| Kevin Oates | USACE | Walla Walla |

9513338.1383

# ATTENDEES

## TPA PROJECT MANAGERS MEETING

AUGUST 9, 1994
(CONTINUATION OF 8/2/94 MEETING)

RICHLAND RED LION
BENTON-FRANKLIN ROOM

| NAME | ORGANIZATION | MAILSTOP |
|---|---|---|
| Nicole Kimball | DOE | A5-19 |
| Steve Moore | Ecology | N1-05 |
| Norm Hepner | Washington State Department of Ecology | N1-05 |
| Darci Teel | Ecology | N1-05 |
| Ted Wooley | Ecology | N1-05 |
| JON YERXA | DOE | A5-15 |
| Doug Sherwood | EPA | B5-01 |
| Roger Stanley | Ecology | |
| Patrick Willison | DOE-RL | A4-52 |
| LARRY ARNOLD | WHC/TPAI | B2-35 |
| SALLY ROBISON | DOE-HQ (EM-44) | EM-44 |
| | | |
| | | |
| | | |

(ATTACHMENT 1)

**Open Action Items**
**Project Managers Meetings**

1. Provide a list of facilities that will be impacted by potential integration of transition D & D facilities into the Tri-Party Agreement (January 21, 1993).

   Resp.: Bob Holt Due: TBD

   Status: A partial list of major facilities in or planned to be in transition (next 10 years) was presented at the September Project Managers Meeting. The list did not contain all major facilities such as: UO3, Purex and PFP. The list is currently being reviewed by DOE management and may be included in ongoing ER negotiations.

   At the August 2nd Project Managers meeting, no additional information was available. L. Arnold of WHC Tri-Party Agreement Integration volunteered to investigate the situation with the goal of closing out this action item.

2. Provide a draft correspondence distribution list by organization and title (August 19, 1993).

   Resp.: Roger Stanley Due: TBD

   Status: List will be developed and issued after the Ecology reorganization is complete. The expected protocol will state all correspondence for day-to-day activities should be directed to the appropriate unit manager or to one of the three Section Heads in the Kennewick office. Correspondence having significant impact or containing issues affecting Tri-Party Agreement milestones should also be sent to Roger Stanley. An updated organization chart for the Kennewick office was provided (attachment 1A); however, the chart is preliminary. After finalization of the chart a distribution list will be developed.

3. Project Managers are to review proposed TPA Appendix F definition with their respective legal counsel and provide feedback to F. Calapristi (WHC) by the next Project Managers meeting. (April 14, 1994)

   Status: The Project Managers discussed the proposed definition but require additional input from their respective legal staff.

   Resp: P. Willison
   R. Stanley
   D. Sherwood
   Due: June 30, 1994

   Status: Action deferred at the August 2nd meeting.

4. After the Ecology reorganization is communicated to DOE, issue guidance to Hanford management for the distribution of correspondence to Ecology and EPA (February 24, 1994).

   Resp: Larry Arnold
   Due: TBD

   Status: The Ecology reorganization is still in process as noted in item 2 above.

5. The Five Year Review of the TPA is due and was discussed by the Project Managers. A response is required from the Project Managers to close out this action item. (May 26, 1994)

   Resp: P. Willison
   R. Stanley
   D. Sherwood
   Due: June 30, 1994

   Status: Action deferred at the August 2nd meeting.

6. Review the SMS Program Managers Assessment form and propose a method to document DOE's assessment of the contractor self-assessment (May 26, 1994).

   Resp. J. Yerxa
   Due: June 30, 1994

   Status: The issue is currently being assessed by DOE management. Jon Yerxa will work with the programs to develop an recommendation by the August 24th Project Managers meeting.

F. T. Calapristi
Status date: August 2, 1994

(ATTACHMENT 1A)

@ Fed. Blg. 7/22/94

# DRAFT

JUL 22 '94 02:48PM DEPT OF ECOLOGY 9513358 #1361 P.1/6

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To Roger Stanley | From Julie & Mgt Team
Co./Dept. & Mgt. Team | Co. | Phone # | Fax # Want Mary well.

P.S. Briefing

## Washington State Department of Ecology
## Nuclear Waste Program
## Kennewick Office

Current Address:
P. O. Box 1368
MSIN: H1-08
Richland, WA 99352

Address Effective 9/15/94:
1315 W. 4th Avenue
Kennewick, WA 99336-6018

PROGRAM MANAGER
Dru Butler
(206) 407-7150

Admin. Asst., Tammy McClure
(206) 407-7149
Fax (206) 407-7151

TPA PROJECT MANAGER
Roger Stanley
(206) 407-7108

Fax (206) 407-7151

ASST. PROGRAM MANAGER
Julie Atwood
736-3090

Fax 736-3030

SECTION MANAGER
Dave Lundstrom
736-3091

Secretary, Marisa Fulks
736-3006
Fax 736-3030

SECTION MANAGER
Steve Alexander
736-3045

Secretary, Senaida Lopez
736-3003
Fax 736-3030

SECTION MANAGER
Dave Nylander
736-3000

Secretary, Sandi Rager
736-3002
Fax 736-3030

OFFICE MANAGER
Joy Kinmark
736-3001

Fax 736-3030

7/22/94

Washington State Department of Ecology
Nuclear Waste Program

## 200 Area Section

**SECTION MANAGER**
Dave Lundstrom
736-3091

Secretary, Marisa Fulks
736-3006
Fax - 736-3030

**Billie Mauss**
Chemist
736-3008

- Chemistry Technical Support
- DQO
- QA/QC
- Sampling/Analysis Plans & Budgeting
- Milestone 14 - Laboratory

**G. Thomas Tebb**
Environmental Specialist
736-3020

- TWRS
- Facility Transition
- PFP
- FFTF

**Dib Goswami**
Hydrogeologist
736-3015

- Sitewide Groundwater Strategy
- Groundwater Remediation
- Innovative Technology
- TSD Hydrogeology

**Alex Stone**
Chemist
736-3018

- Chemistry Technical Support
- Sampling/Analysis Plans & Budgeting

**Moses Jaraysi**
Unit Supervisor
736-3016

Jerry Hensley, 736-3017
Ted Wooley, 736-3012
Bob Wilson, 736-3031
Vacant
Vacant
Vacant

**Jack Donnelly**
Unit Supervisor
736-3013

Norman Hepner, 736-3048
Gary Freedman, 736-3026
Fenggang Ma, 736-3035
Alisa Huckaby, 736-3034
Vacant
Vacant

- RCRA Compliance
- RCRA Closures
- RCRA Permits
- RCRA Corrective Action
- ** PUREX
- UST/LUST
- ** Sitewide Permit
- Construction Oversite
- Pollution Prevention
- Waste Minimization
- ** ERDF
- CERCLA Operable Units

DRAFT

7/22/94

Washington State Department of Ecology
Nuclear Waste Program

## Perimeter Areas Section

**SECTION MANAGER**
Steve Alexander
736-3045

Secretary, Senaida Lopez
736-3003
Fax - 736-3030

**Phillip Staats**
Environmental Specialist
736-3029

- Sitewide Technical Liaison
- RCRA/CERCLA Technical Support

**Jerry Yokel**
Chemist
736-3009

- Chemistry Technical Support
- DQO
- QA/QC
- Risk Management
- Data Management
- Sample/Analysis Plans

**Vacant**
Hydrogeologist

- Groundwater Remediation
- Sitewide Hydrogeology

**Vacant**
Risk Assessment

- Data Management
- Sampling/Analysis Plans
- Risk Communication
- Risk Assessment

**Darci Teel**
Unit Supervisor
736-3010

Stan Leja, 736-3046
Dave Holland, 736-3027
Wayne Soper, 736-3049
Jeanne Wallace, 736-3019
Vacant
Vacant

- RCRA Compliance
- RCRA Closures
- RCRA Permits
- Columbia River Issues
- ALE/Wahluke
- CERCLA Operable Units
- Pollution Prevention
- Waste Minimization

**Steve Moore**
Unit Supervisor
736-3023

Rob Harper, 736-3093
DouGlas Palenshus, 736-3007
Vacant
Vacant
Vacant
Vacant

- General Public Involvement
- Ed. Outreach
- RCRA Compliance
- RCRA Closures
- RCRA Permits
- CERCLA Operable Units
- Sitewide Permit
- Pollution Prevention
- Waste Minimization

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7/22/94

Washington State Department of Ecology
Nuclear Waste Program

**Off Site/Cross Site Section**

**SECTION MANAGER**
Dave Nylander
736-3000

Secretary, Sandi Rager
736-3002
Fax - 736-3030

**Nancy Uziemblo**
Environmental Specialist
736-3014

- Technical Assistance
- Facility Transition
- CERCLA Operable Units

**Donavon Dorsey**
Safety
736-3032

- Safety Mgmt.
- Pollution Prevention
- TPA Milestone Tracking
- Badging

**Vacant**
Information Mgr.

- M35 Manager
- GIS Manager
- Locational Data Mgmt.
- Data Systems Development & Mgmt.
- Data Standards Development

**Vacant**
DOW Contract

- Program Biota Specialist
- Biotic Assessments
- Ecology's Fish & Wildlife Rep.

**Melodie Selby**
Unit Supervisor
736-3021

Greta Davis, 736-3025
Laura Russell, 736-3024
JoAnn Chance, (206) 407-7139
Vacant
Vacant
Vacant
Vacant

- Air Operating Permits
- WQ Permits
- RCRA Permits
- RCRA Compliance
- RCRA Closures
- RCRA Corrective Action
- RCRIS Reporting
- Pollution Prevention
- Waste Minimization

7/22/94

JUL 22 '94 02:49PM DEPT OF ECOLOGY

Washington State Department of Ecology
Nuclear Waste Program

## Office Management Unit

**ASST. PROGRAM MANAGER**
Julie Atwood
736-3090

Fax - 736-3030

**OFFICE MANAGER**
Joy Kinmark
736-3001

736-3030

**Lee Bates**
Computer Info. Consultant
736-3005

- LAN Administration
- Software/Hardware
- HLAN Support
- Data Management Support
- Technical Assistance
- Computer Acquisitions

**Scott Caldwell**
Data Comm. Technician
736-3094

- Hardware/Software Support
- LAN Backup

**Valerie Peery**
Library Technician
736-3097

- Librarian
- Document Tracking
- Central Files
- Forms & Records

**Shelly Rice**
Receptionist
736-3004

- Front Desk
- Mail Distribution
- Reception
- Motor Pool

**Vacant**
Clerk Typist 3

- Backup Receptionist
- Purchasing
- Travel
- Word Processing

7/22/94

9513338.1388

# MAJOR MILESTONES

## Point of Contact (Kennewick Office)

| | | |
|---|---|---|
| M-11 | Billie Mauss | 736-3008 |
| M-13 | Jack Donnelly | 736-3013 |
| M-14 | Billie Mauss | 736-3008 |
| M-15 | Nancy Uziemblo | 736-3014 |
| M-16 | Jack Donnelly | 736-3013 |
| M-17 | Melodie Selby | 736-3021 |
| M-20 | Moses Jaraysi | 736-3016 |
| M-24 | Stan Leja | 736-3046 |
| M-32 | Steve Moore | 736-3023 |
| M-41-45 | G. Thomas Tebb | 736-3020 |
| M-70 | Norman Hepner | 736-3048 |

(ATTACHMENT 2)

# STRATEGY DISCUSSION

9513338.1389

# SAFE STORAGE

- Safe - No known or suspected safety concern.
  - Need:
    - Historical data review.
    - Confirmatory sample data.
    - Confirmatory monitoring data, temperature level.

- Conditionally Safe - Known or Suspected Safety Concern - No Mitigation.*
  - Need:
    - Monitoring data temperature and moisture (to verify no changing negative trends). Characterization: .1, .01, 1.0, etc., still need one or more conditions.

9513338.1390

# Safe Storage, Continued

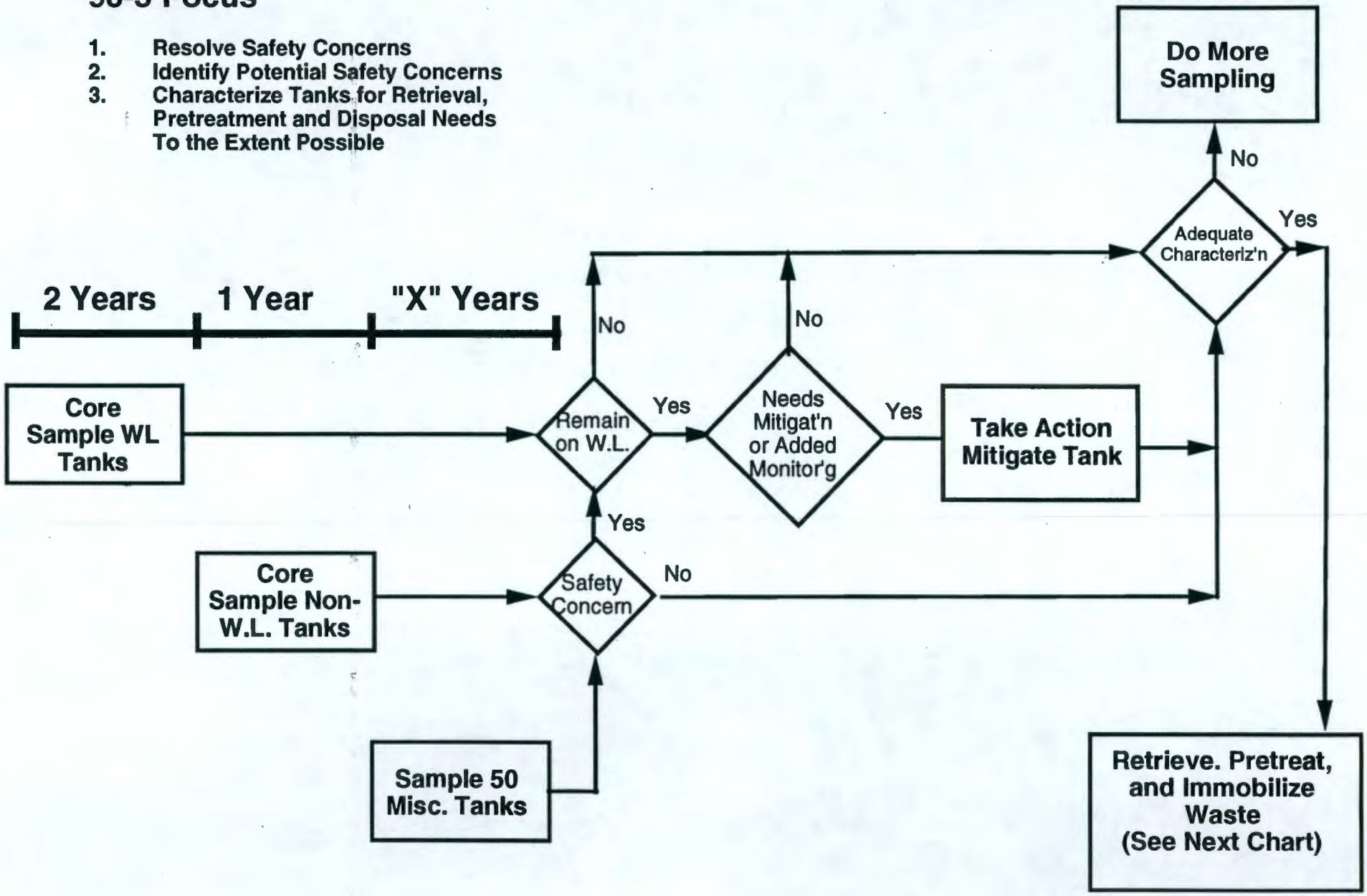
- Unsafe - Known Safety Concern - Mitigation Required.*
  - Need:
    - Characterization data to help identify mitigation technology.
    - Monitoring: gas, temperature, moisture, etc., for trends.

- *Note: How will we know if Mitigation is required?
  - All conditions present for problem, i.e., fuel, oxygen plus temperature. Only need spark - Examples: flammable organic liquid or flammable gas. Both can be detected without core sampling.

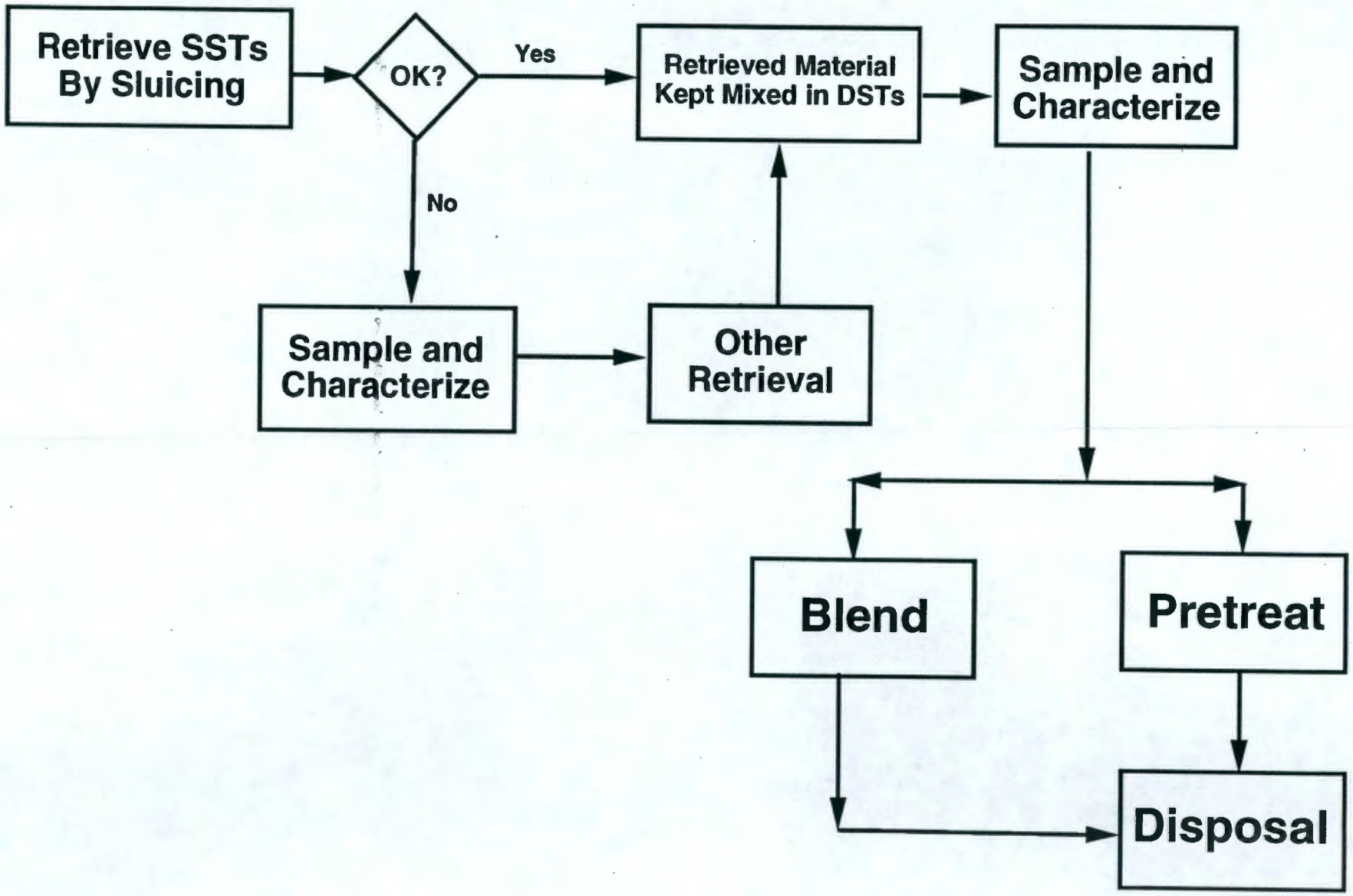
9513338.1391

## 93-5 Focus

1. Resolve Safety Concerns
2. Identify Potential Safety Concerns
3. Characterize Tanks for Retrieval, Pretreatment and Disposal Needs To the Extent Possible




9513338.1392




9513338.1393

# High-Level Task Group

- Approximately 20 people (Experts, Regulators and Stakeholders), proposed to review strategy/logic and determine if the current approach should be changed. (parallel to continued sampling and analysis.)

- Limited time frame, a few weeks.

- Representatives from:
  - DOE
  - WHC
  - PNL/LANL
  - Outside Advisors
  - State and EPA Regulators
  - Stakeholders

- Prefer to involve DNFSB staff in process.

9513338.1394

# SUMMARY

- Most critical safety concern is to determine if any tanks are unsafe. It may be possible to screen for this without core sampling. If so, this screening likely could be done faster and cheaper than present approach.

- If all other tanks are assumed to be conditionally safe and controls/monitoring/analysis can support the position that tanks will remain in "safe" condition until retrieved/disposed, considerably less characterization may be needed than present approach.

- The characterization needs for retrieval, pretreatment and disposal need to be evaluated if a new approach is implemented.

9513338.1395

9513338.1396

(ATTACHMENT 3A)

# TRI-PARTY AGREEMENT NEGOTIATIONS
# ER REFOCUSING
# PUBLIC INVOLVEMENT SCHEDULE

| | Date |
|---|---|
| Negotiating Team Reach Tentative Agreement | August 12 |
| Prepare, print and distribute notice on public comment period (meets 30-day requirement for notifying the public) | August 15 |
| Prepare, print and distribute "primer", send news release and prepare print advertisements on public comment period | August 22 |
| Prepare, print and distribute draft Agreement | August 22 |
| Start 45-day public comment period | August 29 |
| Public meetings on draft Agreement and introduction of Facilities Transition issues | Sept. 20-22 |
| End public comment period | Oct. 12 |
| Prepare, print and distribute Response to Comment document | Aug. 29 through Dec. 15 |
| Present tentative agreements and draft Response to Comment summary to the Hanford Advisory Board | December meeting |
| Sign the final Tri-Party Agreement on ER Refocusing | (Tentative) January |

# Process for Developing a Tri-Party Public Involvement Strategy

## PROJECT BACKGROUND AND APPROACH

Public Involvement has become an important component of the TPA programs currently underway at Hanford. Although this increased emphasis on public involvement and participation in Hanford decision-making is welcomed by activists and community members, it is becoming confusing to have so many outreach efforts happening simultaneously. The agencies and members of the Hanford Advisory Board (HAB) have also expressed a need and desire to involve the broader public in outreach efforts.

What is needed is a strategy for public involvement activities agreed to by USDOE and the regulators, as well as representatives of the public. This strategy will enable the parties to meet regulatory requirements and citizen expectations while also improving efficiency, providing coordination among agency efforts, and avoiding overwhelming interested parties with the sheer number of meetings and other outreach opportunities.

The proposed strategy will include a number of elements; it will

- Articulate the mission and goals of public involvement;
- Identify the decisions for which public involvement is required, distinguishing between public involvement that is required by federal regulatory requirements, TPA requirements, and what the public has come to expect;
- Include an inventory of activities for which public involvement is required and/or desired and a schedule of public involvement -- to be updated on a regular basis;
- Identify appropriate techniques of public involvement for various types of decisions;
- Indicate roles and responsibilities of the agencies for carrying out public involvement;
- Include a feedback mechanism for assessing the effectiveness of the various approaches.

To develop this public involvement strategy, a two-part approach will be undertaken. Part I work will be initiated with the agencies and interested parties on the HAB right away; the intent of this work will be to develop a strategy for immediate and near-term public involvement that primarily depends upon some form of public meeting. Concurrent with Part I work, Part II efforts will begin with research on techniques for developing a strategy that will respond to the agencies' longer-term public involvement needs and that will reach out to involve the broader public in Hanford decision-making.

For Part I, a four-step process is proposed, including:

1. Completing an inventory of upcoming public involvement activities and clarifying the public involvement mission;
2. Identifying a strategy to achieve the mission;
3. Creating a feedback loop for updating the strategy and inventory and measuring progress towards the mission; and
4. Identifying roles and responsibilities of the agencies for carrying out the strategy.

These four steps are described below:

**Inventory and Mission**
A draft public involvement inventory has already been compiled. It will become the basis for discussion among the agencies and interested parties on the HAB about the mission of public involvement and strategies for accomplishing that mission. The products of this step will be a finalized inventory format, a current inventory, and a draft public involvement mission statement, as well as ideas for strategy development.

**Strategy to Achieve the Mission**
Working with the TPA public involvement staff from USDOE, Ecology and EPA and with interested parties on the HAB, including members of the public involvement working group, the consultant will develop an initial draft TPA Public Involvement Strategy. This strategy will be refined through interviews with managers of programs at the three agencies for which public involvement is required or desired and representatives of the Hanford Advisory Board (HAB), and will be finalized in consultation with TPA public involvement staff to assure that all of the program and public needs are met effectively and in a coordinated manner. One important element of these discussions will be how this inventory and strategy relate to the Community Relations Plan (CRP) for the Hanford Federal Facility Agreement and Consent Order. A product of this step will be clarification of how the two documents are to be updated and used.

**Identifying Procedures, Roles and Responsibilities**
Once the strategy is drafted, it will be essential to determine procedures, roles, and responsibilities in carrying it out. These will be explored in a meeting that will involve all three agencies and will include a review of existing procedures and processes. The purpose of the meeting will be to enable all three agencies to implement the public involvement strategy in a coherent and coordinated manner.

**Creating a Feedback Loop**
Included in this strategy will be a method and procedure that the agencies can use to update the inventory and strategy on a regular basis so that it remains current and effective.

**Coordination with the HAB**
The HAB has made clear its desire to give advice on public involvement. To date, the HAB public involvement working group has focused on specific public involvement activities, especially the Environmental Restoration Refocusing. However, developing recommendations for a more comprehensive public involvement strategy is part of the public involvement working group's longer range workplan. It is intended that this effort by the agencies to develop an inventory and strategy for public involvement and to clarify their respective procedures, roles, and responsibilities be coordinated with and complement HAB efforts related to public involvement. The objective of this coordination is increased effectiveness and efficiency; it will be achieved through discussion with interested parties on the HAB throughout the strategy development process. Early involvement in strategy development should facilitate later review of the

document by the public involvement working group and additional recommendations by the full HAB.

For Part II, the consultant will work with the TPA public involvement staff and representatives of the HAB to identify a broader audience that should be targeted in outreach efforts, with a goal of increasing the efficiency of the overall outreach program. The consultant will research and develop a compendium of public involvement techniques appropriate for reaching a broader audience, such as focus groups, telephone surveys, direct mail, electronic meetings or surveys, will consult with staff and others and recommend an implementation plan for these efforts. As directed, the consultant will then help implement this broader outreach.

## SCOPE OF WORK

### *PART I: DEVELOPING A NEAR-TERM STRATEGY*

To complete the two-part development of the public involvement strategy, it is proposed that Triangle Associates carry out the following tasks to assist the USDOE, EPA, and State of Washington Dept. of Ecology in compiling the strategy:

**Task 1. Interviews**
The purpose of the interviews will be to review and complete a list of activities/programs for which public involvement is appropriate and to determine how public involvement has previously been planned and carried out, barriers to effective public involvement, and ideas for how it can be improved. Once a comprehensive list of needs/activities is developed, it will be possible to see how appropriate activities can be carried out effectively, efficiently, and in a timely manner that is respectful of the needs and desires of the agencies and interested citizens/groups.

*A. Interviews with Agency Public Involvement Staff*
Initial interviews will be conducted with up to 24 public involvement and program management staff at:

- USDOE/Westinghouse-Hanford Company/Bechtel Hanford Incorporated
- EPA
- Ecology

In addition to interviews with appropriate staff in each of the three agencies, 2-3 interviews will be conducted with the Washington St. Dept. of Health, which also carries out public involvement activities related to Hanford as part of its regulatory responsibilities.

*B. Interviews with Interested parties on the HAB and Appropriate HAB members*
Interviews will also be conducted with up to 20 public involvement working group members and other interested participants on the Hanford Advisory Board. The purpose of the interviews will be to get their input on what works well with the current approach, what needs improvement, and their ideas and suggestions for how to improve the existing approach. The primary focus of the interviews will be on policy and strategy

development, with some attention also paid to meeting content, logistics and arrangements, and to procedures, roles, and responsibilities of the agencies. Interviewees will also be asked to comment on the CRP and how it should relate to this Public Involvement Strategy. At the conclusion of the interviews, the agency public involvement staff and the consultant will be available to meet with representatives of the HAB, including the HAB public involvement working group, to discuss the interview findings.

**Task 2. Development of a Draft Public Involvement Strategy**

*A. Preparation of a First Draft Strategy and Evaluation Mechanism*

Triangle Associates, in close consultation with the Public Involvement staff in each agency, will compile a first draft public involvement strategy summarizing and analyzing the interviews and making suggestions for coordinating TPA public involvement efforts and the cooperative efforts among the three agencies. The strategy will include a method and procedure for updating the strategy on a regular basis so that it continues to provide the needed coordination. It will also include a method for evaluating the success of the public involvement efforts. This draft strategy will be reviewed by the public involvement staff of agencies and revised according to comments.

*B. Feedback on the Draft Strategy*

Once the revised draft strategy is prepared, comments will be sought from key program managers whose activities call for public involvement and with interested parties on the HAB, including members of the public involvement working group. The purpose of the interviews will be to give them an opportunity to review and comment on the draft strategy before it is finalized, to ensure that it takes into account their needs, concerns and ideas for public involvement. Up to 40 interviews will be conducted. As a product of these interviews, possible changes to the first draft strategy will be incorporated in the revised draft strategy.

*C. Meeting to Discuss the Revised Draft Strategy*

Agency public involvement staff and program managers and representatives of the HAB will be invited to a meeting to discuss the revised draft strategy. The product of this meeting will be a final draft strategy.

*D. Identification of Agency Roles and Responsibilities*

Triangle Associates will meet with key public involvement staff from all three agencies to identify the roles and responsibilities of each agency for strategy implementation. The product of this meeting will be a joint memorandum on agency roles and responsibilities related to public involvement.

**Task 3. Meetings on strategy implementation**

*A. Joint Agency Meeting on Strategy Implementation and Agency Roles and Responsibilities*

A joint workshop will be held that will involve public involvement staff and key program managers within each agency. The purpose of the workshop will be to twofold: to discuss the role of public involvement in the agencies' decision-making at Hanford (including the public involvement mission, goals, inventory and strategy, and roles and responsibilities), and to initiate strategic planning within each agency to implement the public involvement strategy. During the workshop, it is expected that participants will

meet in plenary session and also separately, by agency, to develop a strategic plan for implementing the public involvement strategy within each agency. The focus of this work will be the public involvement activities conducted cooperatively by the three agencies. The meeting is not intended to identify or address intra-agency issues, except as they impact the cooperative efforts.

*B. Meet with interested parties on the HAB to review draft documents.*
The consultant and public involvement staff from the three agencies will meet with interested parties on the HAB, and will present the final draft strategy in the HAB format requested, to review the work to date and determine how it might be presented and reviewed by the full HAB.

*C. Debrief of the Meetings, Interest Group/HAB Representative Input and Fine Tuning of the Strategy*
After the conclusion of the workshop on implementing the public involvement strategy, Triangle Associates will meet with the key public involvement staff from each agency to debrief the workshop and to make adjustments or modifications to the public involvement strategy, in light of the issues, concerns and ideas that emerged during the workshop. The method and procedure for updating the strategy will also be finalized.

## *PART II: IDENTIFYING NEEDS, OPPORTUNITIES, AND TECHNIQUES FOR BROADER PUBLIC INVOLVEMENT*

The work under this Part is intended to identify broader audiences for public involvement and techniques that are most effective for reaching those audiences. It will result in an implementation plan for broader public involvement that will be initiated at the request of the three parties.

To the extent possible, the work in Part II will be conducted simultaneous to that in Part I. Because some of the techniques for broader public involvement such as surveys are time-consuming and therefore might take longer than the Part I strategy development, the related tasks are included as a separate Part II. This will allow the work on Part I to proceed without delay. If Part II is completed on a different schedule than Part I, it will be incorporated in revisions to the overall Public Involvement Strategy.

### Task 1. Identify Techniques for Expanding Public Involvement

The consultant will work with the agency public involvement representatives and representatives of the HAB to identify target audiences for broader public involvement and techniques for expanding public involvement . Such techniques include

- Focus groups to identify what people want to know about Hanford TPA activities, how they want to get such information, and how they want to participate in decision-making at Hanford.
- Telephone surveys to check public perceptions, interests, and information needs
- Direct mail campaigns
- Electronic town meetings or television polling
- Other mass outreach techniques

The product of this task will be a compendium of needs and techniques for outreach to the broader public and an Implementation Plan for incorporating the most appropriate techniques into the public involvement strategy.

**Task 2. Conducting appropriate outreach to expand public involvement**
Work under this task will depend on what is agreed to following Part II, Task 1.

**Project Schedule**
The tentative schedule for this project will be as follows:

| | |
|---|---|
| Week 1 | Finalize scope of work, and set up project outreach. |
| Weeks 2 &3 | Conduct interviews with key public involvement staff at USDOE, EPA and Ecology and other agencies, such as WA St. Dept. of Health |
| Weeks 4, 5 & 6 | Conduct interviews with interested parties on the HAB; initiate research into range of techniques for expanding public involvement to the broader public |
| Weeks 7 & 8 | Draft strategy and revise according to comments from key public involvement staff at USDOE, EPA and Ecology; draft Implementation Plan for Broader Public Involvement for Part II and revise according to agency comments |
| Weeks 9 & 10 | Interviews with key program managers at the agencies and with public interest group members and appropriate members of HAB; initiate Part II tasks. |
| Weeks 11 - 13 | Revise draft strategy in consultation with key public involvement staff at the agencies; continue Part II tasks |
| Weeks 14 - 17 | Prepare for agency workshop on implementing the strategy; draft report of results from Part II work and develop ideas for integrating Part II work into the public involvement strategy. |
| Week 18 | Conduct the workshop on implementing the strategy, including a discussion of how to reach out to the broader public based on the results of Part II work. |
| Week 19 - 20 | Debrief the workshop and finalize the draft strategy. |

9513338.1403

(ATTACHMENT 4A)

| Change Number | Federal Facility Agreement and Consent Order Change Control Form | Date |
|---|---|---|
| M-15-94-07 | Do not use blue ink. Type or print using black ink. | May 3, 1994 |

**Originator**

Eric Goller

**Phone**

376-7326

**Class of Change**

[ ] I - Signatories [X] II - Project Manager [ ] III - Unit Manager

**Change Title**

100-HR-2 Operable Unit RFI/CMS Interim Milestones

**Description/Justification of Change**

Three interim milestones are proposed to ensure that 100-HR-2 Operable Unit Work Plan activities are completed on schedule. They are as follows:

1. (M-15-18A) Submit the 100-HR-2 OU Limited Field Investigation/Qualitative Risk Assessment Report to Ecology and the EPA. Completion date - September ~~2330~~, 1994.

2. (M-15-18B) Submit the 100-HR-2 OU Focused Feasibility Study Report to Ecology and the EPA. Completion date - January ~~2031~~, 1994.

3. (M-15-18C) Submit the 100-HR-2 OU IRM Proposed Plan to Ecology and the EPA. Completion date - January ~~2031~~, 1994.

**Impact of Change**

This change will not impact the current scope, schedule or investigative costs.

**Affected Documents**

Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Work Schedule.

RCRA Facility Investigation / Corrective Measures Study for the 100-HR-2 Operable Unit, Hanford Site, Richland, Washington (DOE/RL 93-20) Draft A.

**Approvals**

| | | | |
|---|---|---|---|
| DOE | Date | ___ Approved | ___ Disapproved |
| EPA | Date | ___ Approved | ___ Disapproved |
| Ecology | Date | ___ Approved | ___ Disapproved |

9513338.1404

(ATTACHMENT 4B)

| Change Number | Federal Facility Agreement and Consent Order Change Control Form | Date |
|---|---|---|
| C-93-08 | Do not use blue ink. Type or print using black ink. | August 1,1994 |

Originator: R. N. Krekel

Phone: (509) 376-4264

Class of Change

[ ] I - Signatories [X] II - Project Manager [ ] III - Unit Manager

Change Title

Incorporation of Hanford Generating Plant (HGP) into 100-NR-1 Operable Unit

Description/Justification of Change

The HGP RCRA Facility Assessment (RFA) issued by EPA identified 11 Solid Waste Management Units (SWMU) associated with the HGP. The HGP is currently not covered by the Hanford Federal Facility Agreement and Consent Order (TPA). The HGP was originally left out of the TPA, as the land where these units are located was leased. The lease has since expired, and therefore DOE proposes to extend the boundary of the 100-NR-1 operable unit to include the formerly leased HGP land. The Hanford Facility RCRA permit references the TPA for identification and actions for those units under the direct responsibility of DOE.

(Continued on next page)

Impact of Change

This change will require an amendment of the existing 100-NR-1 operable unit investigation activity. The impacts to cost and schedule have not been evaluated but are expected to be minimal.

Affected Documents

Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Appendix C, 100-NR-1 Work Plan, and WIDS/HSWMUR

Approvals ___ Approved ___ Disapproved

DOE _____ Date _____

EPA _____ Date _____

Ecology _____ Date _____

Description/Justification of Change (Continued)

Attachment 1 lists the units identified within the HGP RFA and shows which of these units have been identified within the 100-NR-1 Work Plan. Only the HGP Burn Pit, along with a Construction Debris Dump and Grass Dump (combined in RFA SWMU #11) were considered in the Work Plan as units within the 100-NR-1 Operable Unit as they are located outside of the HGP fenced area. All identified units within the fenced area were listed only as potential sources of contamination. The attachment shows that one unit has been entered into the Waste Information Data System (WIDS) and is currently included in the Hanford Site Waste Management Units Report (HSWMUR) as part of operable unit 100-NR-1. This is the 600-32 dumping area, and is assumed to bound the burn pit, construction debris dump, and grass dump which are located south of the HGP fenced area.

Following is the list of units to be added to the 100-NR-1 operable unit in Appendix C of the TPA:

- HGP Transformer Yard (RFA SWMU #1)
- HGP Tile Field (RFA SWMU #5)
- HGP Settling Pond (RFA SWMU #6)
- HGP Outfall (RFA SWMU # 7)
- Maintenance Garage French Drain (RFA SWMU #9, unit of concern)
- HGP Disposal and Storage Area (RFA SWMU #10)

The HGP RFA also requested further action for the HGP Floor Drains, Sumps and Piping (RFA SWMU #3), and the HGP Maintenance Garage (RFA SWMU #8). In both cases the concerns raised were the transport systems to the respective disposal facilities. The piping system from the HGP building drains will be addressed in conjunction with the Settling Pond (RFA SWMU #6). The piping system from the Maintenance Garage will be addressed in conjunction with the Maintenance Garage French Drain (RFA SWMU #9).

The remaining two units identified as part of the Waste Treatment Units (RFA SWMU #9) will be entered into the TPA Appendix C listing as the 1701-NE Septic Tank and the 1703-N Septic tank, respectively. The 600-32 Dumping Area and the HGP Diesel Oil Storage Tank will also be added to the 100-NR-1 operable unit listing in Appendix C to the TPA. The HGP Gasoline Storage Tank has been removed from the ground with verification that no contamination remains. Therefore it will not be added to the TPA Appendix C.

The HGP Outfall (RFA SWMU #7) was identified through assessment as requiring further action to investigate surface water and sediments near the outfall diffuser ports, however, the outfall is operated under the authority of an EPA National Pollution Discharge Elimination System permit. Under this permit the discharge of effluent is not regulated under RCRA, therefore, the outfall is not a SWMU and it will be reflected as such in WIDS.

All the units listed and discussed above (with exception of the 600-32 dumping area which is already included), along with the HGP Building Oil Storage Area (RFA SWMU #2) and Turbine Oil Filter Unit (RFA SWMU #4) will also be added to the WIDS. Since the HGP Building Oil Storage Area and the Turbine Oil Filter Unit have been identified through assessment as requiring no further action at this time and are not disposal type units, they will be shown in the next update of the HSWMUR as other waste units within the operable unit area.

Description/Justification of Change (Continued)

Groundwater associated with the HGP area will be addressed as part of the 100-NR-2 groundwater operable unit.

This change will provide for better integration of activities within the 100-N area relevant to investigation and cleanup. This is reflected in the fact that the existing 100-NR-1 work plan had already listed the majority of the HGP units as potential sources. By incorporating into the TPA, the HGP activity will also be properly integrated and prioritized with other Hanford site cleanup actions.

| SWMU's Identified in RFA | Units Currently Identified in 100-NR-1 Work Plan | HSWMUR/WIDS Current Designation |
|---|---|---|
| 1. Transformer Yard | Transformer Yard* | Not yet entered |
| 2. HGP Bldg Oil Storage Area | Not included | Not yet entered |
| 3. HGP Bldg Floor Drains, Sumps & All Piping to Pond/Outfall | Not included | Not yet entered |
| 4. Turbine Oil Filter Unit | Not included | Not yet entered |
| 5. Tile Field | Tile Field* | Not yet entered |
| 6. Settling Pond | Settling Pond* | Not yet entered |
| 7. Outfall (1) | Outfall (1) * | Not yet entered |
| 8. Maintenance Garage (2) | Not included | Not yet entered |
| 9. 3 Wastewater Treatment Units (3) | 3 HGP Septic Tanks* | Not yet entered |
| 10. Disposal and Storage Area | Bone Yard* | Not yet entered |
| 11. Burn Pit(aka. Construction Debris Dump) | HGP Burn Pit/Construction Debris Dump/Grass Dump | 600-32 Dumping Area |
| No SWMU Identified | HGP Gasoline Storage Tank* | Not yet entered |
| No SWMU Identified | HGP Diesel Oil Storage Tank* | Not yet entered |

(1) Operated under the authority of an NPDES permit; not a RCRA SWMU. Will be further investigated in conjunction with the operable unit.
(2) Per RFA report, required action limited to piping to waste treatment unit in SWMU #9.
(3) Per RFA report, required action limited to waste treatment unit (French Drain) receiving wastes from Maintenance Garage (SWMU #8).

* Potential Source

9513338.1408 (ATTACHMENT 4C)

| Change Number | Federal Facility Agreement and Consent Order Change Control Form | Date |
|---|---|---|
| M-35-94-01 | Do not use blue ink. Type or print using black ink. | August 1, 1994 |

Originator: Susan Bullard, RL/SID

Phone: (509) 376-8275

Class of Change

[ ] I - Signatories [X] II - Project Manager [ ] III - Unit Manager

Change Title

Modification of Milestones M-35-02, M-35-03 and M-35-04.

Description/Justification of Change

**This change request modifies interim milestones M-35-02, M-35-03 and M-35-04 as follows:**

Original text of milestones:

| | | |
|---|---|---|
| M-35-02 | DOE SHALL DEVELOP AND SUBMIT TO THE REGULATORS A "TPA STRATEGIC DATA MANAGEMENT PLAN" AS A PRIMARY DOCUMENT WHICH WILL INCLUDE OR ADDRESS THE ITEMS LISTED BELOW:<br><br>A. IDENTIFICATION OF TPA RELATED DATA, TPA DATA USERS, PURPOSES OF DATA USE, INFORMATION TO BE INDEXED AND ACCESSED, AND AN IMPLEMENTATION SCHEDULE.<br><br>B. SITE STANDARDS FOR DATA MANAGEMENT, GIS SPATIAL DATA, LOCATIONAL DATA COLLECTION, ETC. | 9/30/1994 |

Continued on Page 2 of 3.

Impact of Change

No impacts are identified as a result of this modification to Milestones M-35-02, M-35-03, M-35-04.

Affected Documents

Hanford Federal Facility Agreement and Consent Order, Appendix D.

Approvals

| | | | |
|---|---|---|---|
| DOE | Date | ___ Approved | ___ Disapproved |
| EPA | Date | ___ Approved | ___ Disapproved |
| Ecology | Date | ___ Approved | ___ Disapproved |

Description/Justification of Change (Continued).

C. DATA MANAGEMENT ORGANIZATIONAL STRUCTURE TO IMPLEMENT THE PROCESSES DEFINED IN THIS PLAN.

D. THE FOLLOWING TEN DATA MANAGEMENT INITIATIVES WILL BE EVALUATED AND WHERE APPROPRIATE IMPLEMENTATION ACTIONS AND SCHEDULES WILL BE INCLUDED IN THE STRATEGIC DATA MANAGEMENT PLAN.
THE INITIATIVES ARE:
- LOCATIONAL DATA COLLECTION STANDARDS
- DATABASE DOCUMENTATION AND LISTING OF EXISTING SYSTEMS UPDATE
- DATA REFERENCE SEARCH INFORMATION SYSTEM
- EII PROCEDURES UPDATE
- DIGITAL GIS BASE MAP DATA COLLECTION
- SITEWIDE ORTHOPHOTOGRAPHY PROGRAM
- MONUMENT CONTROL NETWORK SYSTEM
- ENGINEERING SURVEY DATA COLLECTION STANDARDS
- STANDARD WELL ID/NAMING AND LOCATION COORDINATES
- HISTORICAL DATA MANAGEMENT.

AN AGREED UPON DESCRIPTION IS DOCUMENTED UNDER "PURPOSE" FOR EACH OF THESE INITIATIVES IN ATTACHMENT XX, DATA MANAGEMENT INITIATIVES, DATED SEPTEMBER 20, 1993.

| | | |
|---|---|---|
| M-35-03 | DEVELOP AND SUBMIT TO THE REGULATORS DATA MANAGEMENT PLANS FOR EACH DOE-RL PROGRAM OFFICE (ER, WM, TWRS). | 3/31/1995 |
| M-35-04 | DOE SUBMIT A SIGNED CHANGE PACKAGE WITH MAJOR AND INTERIM MILESTONES AND TARGETS DATES FOR DATA MANAGEMENT INITIATIVES IN THE STRATEGIC DATA MANAGEMENT PLAN. | 1/31/1995 |

**These milestones are modified to read as follows:**

| | | |
|---|---|---|
| M-35-02 | DOE SHALL DEVELOP AND SUBMIT, TO THE REGULATORS A "STRATEGIC PLAN FOR HANFORD SITE INFORMATION MANAGEMENT", THIS PRIMARY DOCUMENT WILL INCLUDE: | 9/30/1994 |

A. HANFORD SITE INFORMATION MANAGEMENT MISSION, VISION, GOALS AND STRATEGIES.

B. DATA MANAGEMENT ORGANIZATIONAL STRUCTURE TO IMPLEMENT THE PROCESSES DEFINED IN THIS PLAN.

Description/Justification of Change (Continued).

M-35-03 DEVELOP AND SUBMIT TO THE REGULATORS DATA MANAGEMENT PLANS WHICH WILL COVER ALL PROGRAMMATIC FUNCTIONAL AREAS. 2/28/1995

A. IDENTIFICATION OF TPA RELATED DATA, TPA DATA USERS, PURPOSES OF DATA USE, INFORMATION TO BE INDEXED AND ACCESSED, AND AN IMPLEMENTATION SCHEDULE.

B. SITE STANDARDS FOR DATA MANAGEMENT, GIS SPATIAL DATA, LOCATIONAL DATA COLLECTION, ETC.

C. THE FOLLOWING TEN DATA MANAGEMENT INITIATIVES WILL BE EVALUATED AND WHERE APPROPRIATE IMPLEMENTATION ACTIONS AND SCHEDULES WILL BE INCLUDED IN THE DATA MANAGEMENT PLANS AND INFORMATION MANAGEMENT IMPLEMENTATION PLAN.

THE INITIATIVES ARE:
- LOCATIONAL DATA COLLECTION STANDARDS
- DATABASE DOCUMENTATION AND LISTING OF EXISTING SYSTEMS UPDATE
- DATA REFERENCE SEARCH INFORMATION SYSTEM
- EII PROCEDURES UPDATE
- DIGITAL GIS BASE MAP DATA COLLECTION
- SITEWIDE ORTHOPHOTOGRAPHY PROGRAM
- MONUMENT CONTROL NETWORK SYSTEM
- ENGINEERING SURVEY DATA COLLECTION STANDARDS
- STANDARD WELL ID/NAMING AND LOCATION COORDINATES
- HISTORICAL DATA MANAGEMENT.

AN AGREED UPON DESCRIPTION IS DOCUMENTED UNDER "PURPOSE" FOR EACH OF THESE INITIATIVES IN ATTACHMENT G, DATA MANAGEMENT INITIATIVES, DATED SEPTEMBER 20, 1993.

M-35-04 DOE WILL SUBMIT TO THE REGULATORS: 3/31/1995

A. AN IMPLEMENTATION PLAN WHICH WILL INCLUDE ACTIVITIES AND TARGET DATES FOR INITIATIVES FROM THE STRATEGIC PLAN FOR HANFORD INFORMATION MANAGEMENT AND THE DATA MANAGEMENT PLANS.

B. A CHANGE PACKAGE IDENTIFYING THE MAJOR INITIATIVES WHICH WILL BE THE FUTURE TPA DATA MANAGEMENT MILESTONES.

At the times the milestones were developed, the planning process had not yet been developed. This revision to Milestones M-35-02, M-35-03 and M-35-04 makes no substantial changes, but places the work in the order that it needs to be done to achieve the most practical and productive outcome.

9513338.1411

(ATTACHMENT 4D)

Washington State Department of Ecology
U.S. Environmental Protection Agency
U.S. Department of Energy

September 14, 1990

To: Hanford Unit Managers and Contractor Representatives

GUIDELINES FOR USE OF CLASS III CHANGE PACKAGES

It has recently become evident that guidance is needed regarding the use of Class III change packages for Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) target dates. Unlike interim and major milestones, target dates are measurements of progress rather than enforceable due dates. For this reason, more latitude and flexibility exists regarding the processing of Tri-Party Agreement Class III change requests. Nonetheless, some general guidelines should be followed:

A Class III change request must be initiated if:

1) The projected schedule delay could impact completion of an interim or major milestone; or

2) The projected schedule delay is more than 60 days.

The decision on whether a situation meets the criteria specified above rests with the three Unit Managers (DOE-RL, Ecology, and EPA). Each Unit Manager must exercise judgement in determining whether a change package is warranted.

Class III change packages should be initiated and completed on a face-to-face basis between the Unit Managers for the three parties, thus removing the need for transmittal letters. The completed change package will be placed in the appropriate Administrative Record(s) by the DOE Unit Manager as necessary. Each Unit Manager will have the responsibility of briefing his/her Project Manager of the change package. The Unit Managers will brief their respective Project Managers in advance of issuing the Class III change package whenever the change could impact timely completion of a milestone.

If you have any questions regarding these guidelines, please feel free to contact Steve Wisness, DOE-RL, at (509) 376-6798, Tim Nord, Ecology, at (206) 438-7021, Paul Day, EPA, at (509) 376-6623, or Linda Powers, WHC, at (509) 376-6204.

Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy - Richland Operations

Tim L. Nord
Hanford Project Manager
Washington State Department of Ecology

Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency

cc: R. F. Stanley, Ecology
G. Hofer, EPA
R. D. Izatt, DOE
L. L. Powers, WHC

9513338.1413 (ATTACHMENT 5)

# Tri-Party Agreement Issue Analysis Worksheet

Issue Advocate: Jim Rasmussen (RL) Date: August 2, 1994

Disputing Party(ies): DOE-RL, EPA, and State of Washington

**ISSUE DESCRIPTION:**

Significant legal and regulatory issues, associated with permitting and obtaining the use of State land for the 300 Area Treated Effluent Disposal Facility (TEDF), are preventing the scheduled completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestones M-17-09 and M-17-00A. The principal areas of concern are related to obtaining 1) a National Pollutant Discharge Elimination System (NPDES) Permit from EPA that can be complied with using the existing best available technology (BAT) facility design, and 2) a Land Lease from the State of Washington for operating the 300 Area outfall piping. These concerns are described in more detail below:

**Background:**

1. NPDES Permit Limits for 300 Area TEDF

The 300 Area TEDF was designed and constructed in parallel with the permitting process, using BAT for treatment of contaminants known to be contained in the 300 Area process wastewater streams. This BAT treatment selection was documented in an engineering study (WHC-SD-L045H-ER-002) and submitted to the regulators for concurrence. Since that time, the treatment facility has progressed through conceptual design, detailed design, construction, and testing, to the point that the facility is nearly operational.

The BAT treatment process selected (co-precipitation with ultra violet/peroxide reduction and thiol functional group ion-exchange) was based on stream characterization data and limited bench scale treatability data. The NPDES permit application submitted to EPA on July 3, 1992, included estimated treatment capabilities of the facility by providing estimated maximum and average daily values for the constituents of concern being discharged to the Columbia River. These estimated values, without consideration of factors to account for scale-up, statistical uncertainties, or the use of a single pH/ferric chloride level, were used by EPA as the sole basis for the final permit limit decisions that appear in the draft permit issued for public comment.

The limits proposed in the draft NPDES permit application have been reviewed in depth and have been determined to be too restrictive to be met on an ongoing basis. Several series of comments have been submitted to and discussed with EPA, the latest of which is in response to the public comment cycle. The permit contains thirty-four end-of-pipe limits, including sixteen metals and ten organics. Two significant issues were identified concerning the actual end-of-pipe discharge limits: 1) additional bench scale treatability data indicates that the metal limits cannot be met consistently

with the existing equipment in the facility and 2) some of the limits are below accepted commercial laboratory detection levels.

Additional concerns with regard to compliance with the draft permit limits include: contamination found in process chemicals, excessive sampling costs due to specific analytical methods required by the permit, and whole effluent toxicity testing. Overall, the permit limits are excessive and will not allow for efficient and regulatory compliant operation of the facility.

Performance against the proposed NPDES permit limits would result in routine violations, possible fines, and negative publicity, all conditions deemed unacceptable by the U. S. Department of Energy, Richland Operations (RL). Extensive facility modification would be required to meet the proposed limits, as currently drafted. The facility modifications required to comply with the single digit parts per billion effluent limitations would take a year or more to complete, well beyond the M-17-00A milestone due date of June 30, 1995 for cease of discharge. An appeal of the NPDES permit might also be necessary, which could also extend beyond the M-17-00A milestone due date.

2. Land Lease for Use of 300 Area Outfall.

A land lease from the State of Washington Department of Natural Resources (DNR) is required for operation of the 300 Area TEDF and appears deadlocked in negotiations that have been ongoing for the past year. The DNR has been held as a potentially responsible party by EPA at another site, where they issued a land lease to allow the construction of an outfall. This experience has caused them to seek indemnification in the land lease for the 300 Area TEDF. The indemnification that the DNR requires is legally unacceptable to the DOE-RL, due to the anti-deficiency requirements of the federal government.

Permit type requirements have also been incorporated into the lease by DNR, including sediment monitoring, river monitoring, radionuclide monitoring, and fines for violations of these conditions. These requirements are extensive and are considered duplications of the regulatory authority of other agencies.

**Proposed Solution:**

After months of negotiations and comments between DOE-RL and the respective agencies, it has become evident that resolution of these issues is outside the influence of DOE-RL. Because of the positions taken by the respective agencies, DOE-RL believes that the subject milestones are in jeopardy and requests that completion dates be changed based on the resolution of the legal and regulatory issues stated above. As a result, completion dates for Milestones M-17-09 and M-17-00A would be changed to "TBD", while exhaustive efforts are continued toward a final resolution of these issues. There should be clear recognition that these milestones are being suspended until a mutually acceptable resolution is negotiated for each of the issues and new milestone due dates can be developed. In the event that the legal and regulatory issues are not resolved, a delay in startup of the 300 Area TEDF could likely result in missing major milestone M-17-00A (Liquid Effluent Treatment Upgrades for Phase I Streams), a congressionally mandated requirement.

**Responsible Managers**:

Dana C. Bryson, Unit Manager, DOE-RL

Doug R. Sherwood, Unit Manager, EPA Region 10

Melody A. Selby, Unit Manager, Washington State Department of Ecology

| Step | | | | Initial | Date |
|---|---|---|---|---|---|
| 1 | ( ) Resolved | ( ) Unresolved - To Project Managers | | _____ | _____ |
| 2 | ( ) Resolved | ( ) Unresolved - To members of DRC | | _____ | _____ |
| 3 | ( ) Resolved | ( ) Unresolved - To SEC | | _____ | _____ |
| 4 | Resolved by SEC | | | _____ | _____ |

# Issue Disposition Statement

**ISSUE DESCRIPTION:**

Significant legal and regulatory issues, associated with permitting and obtaining the use of State land for the 300 Area Treated Effluent Disposal Facility (TEDF), are preventing the scheduled completion of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestones M-17-09 and M-17-00A. The principal areas of concern are related to obtaining 1) a National Pollutant Discharge Elimination System (NPDES) Permit from EPA that can be complied with using the existing best available technology (BAT) facility design, and 2) a Land Lease from the State of Washington for operating the 300 Area outfall piping.

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**FINAL RESOLUTION:**

Approval: _____ Date: _____
U. S. Environmental Protection Agency

Approval: _____ Date: _____
Washington State Department of Ecology

Approval: _____ Date: _____
U. S. Department of Energy

Figure 5-1. Development of Alternatives for Solid Waste (Page 1 of 3)

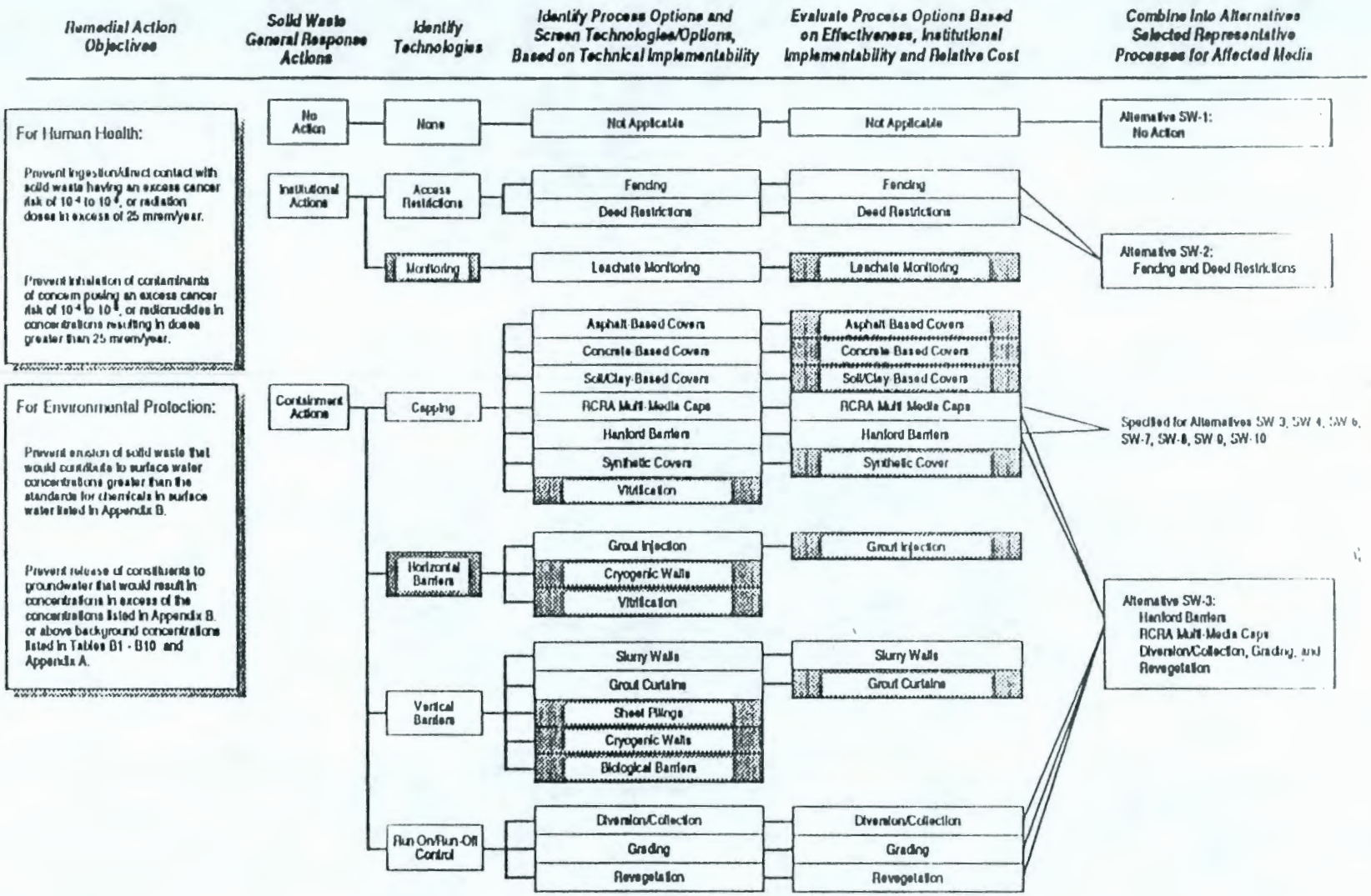


Figure 5-1. Development of Alternatives for Solid Waste (Page 2 of 3)

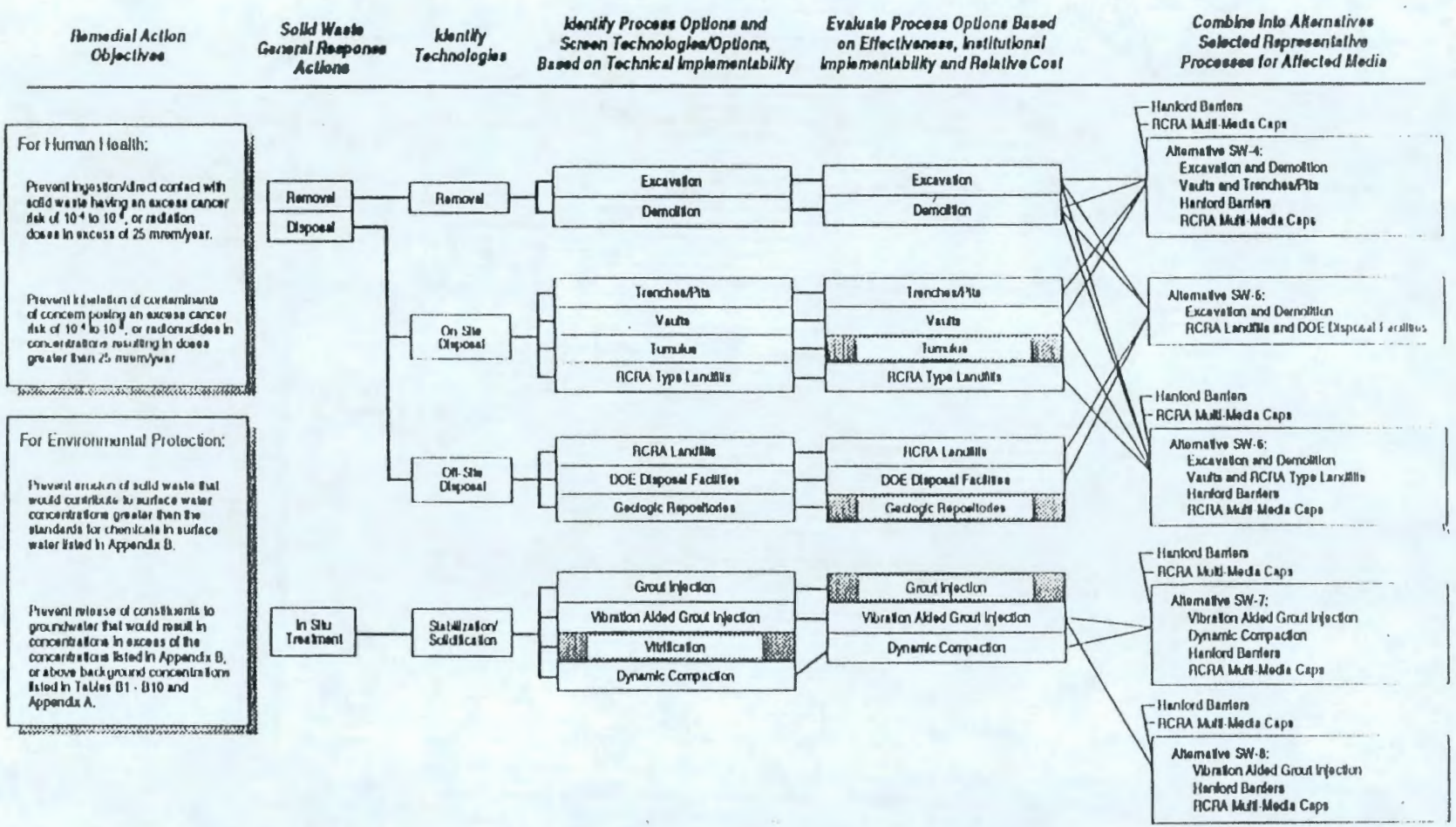


Figure 5-1. Development of Alternatives for Solid Waste (Page 3 of 3)

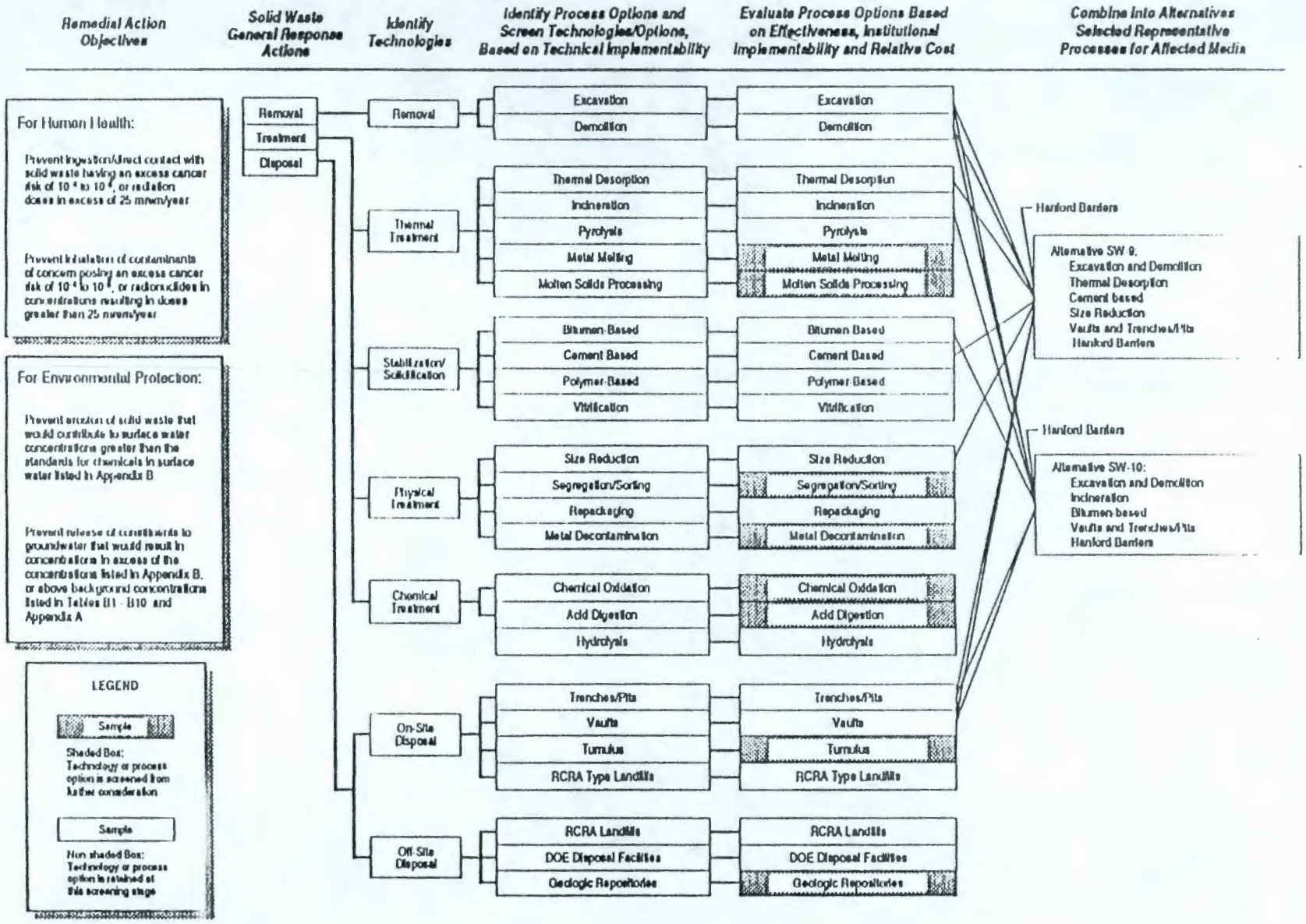


Figure 5-2. Development of Alternatives for Groundwater (Page 1 of 4)

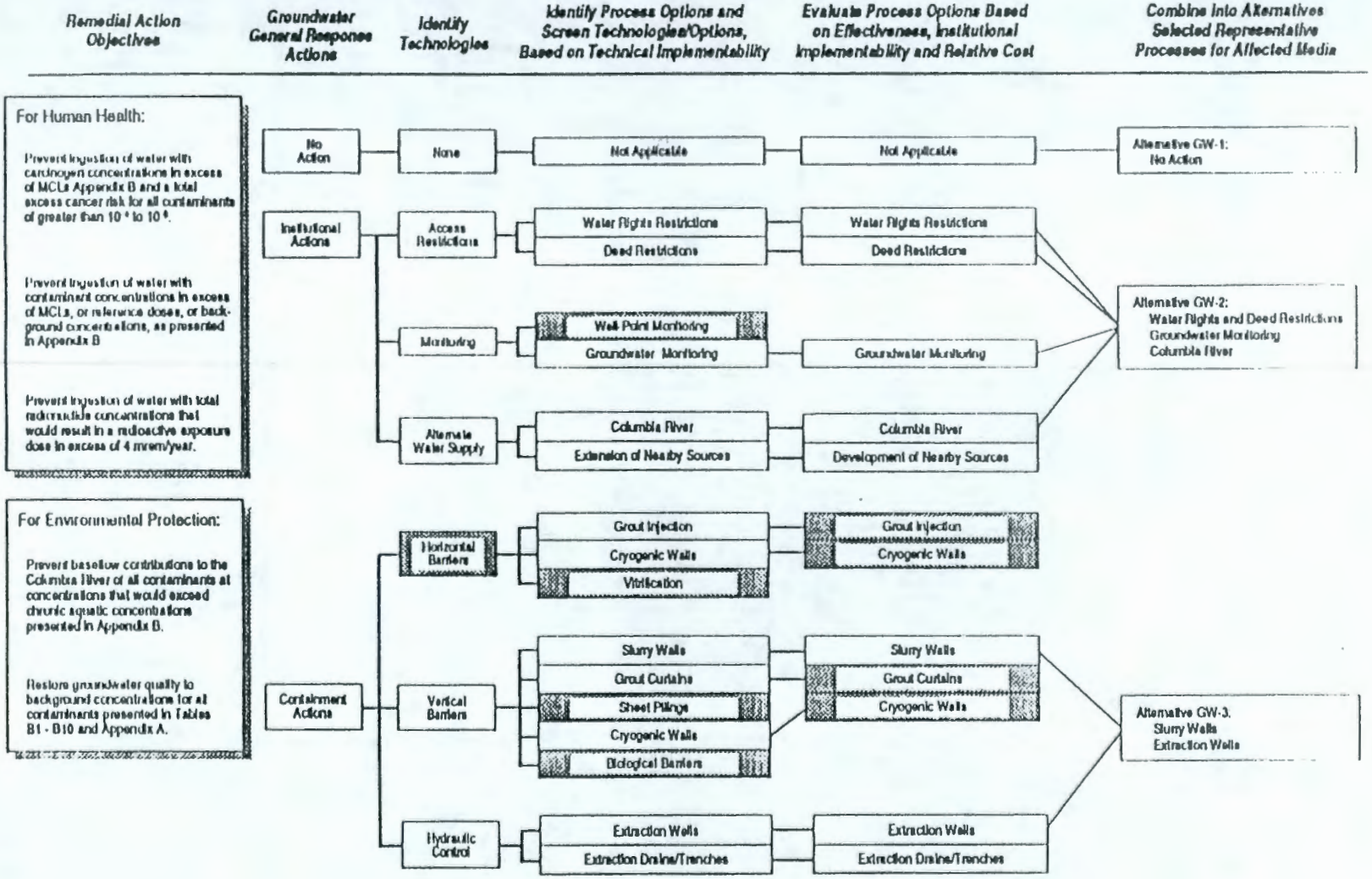
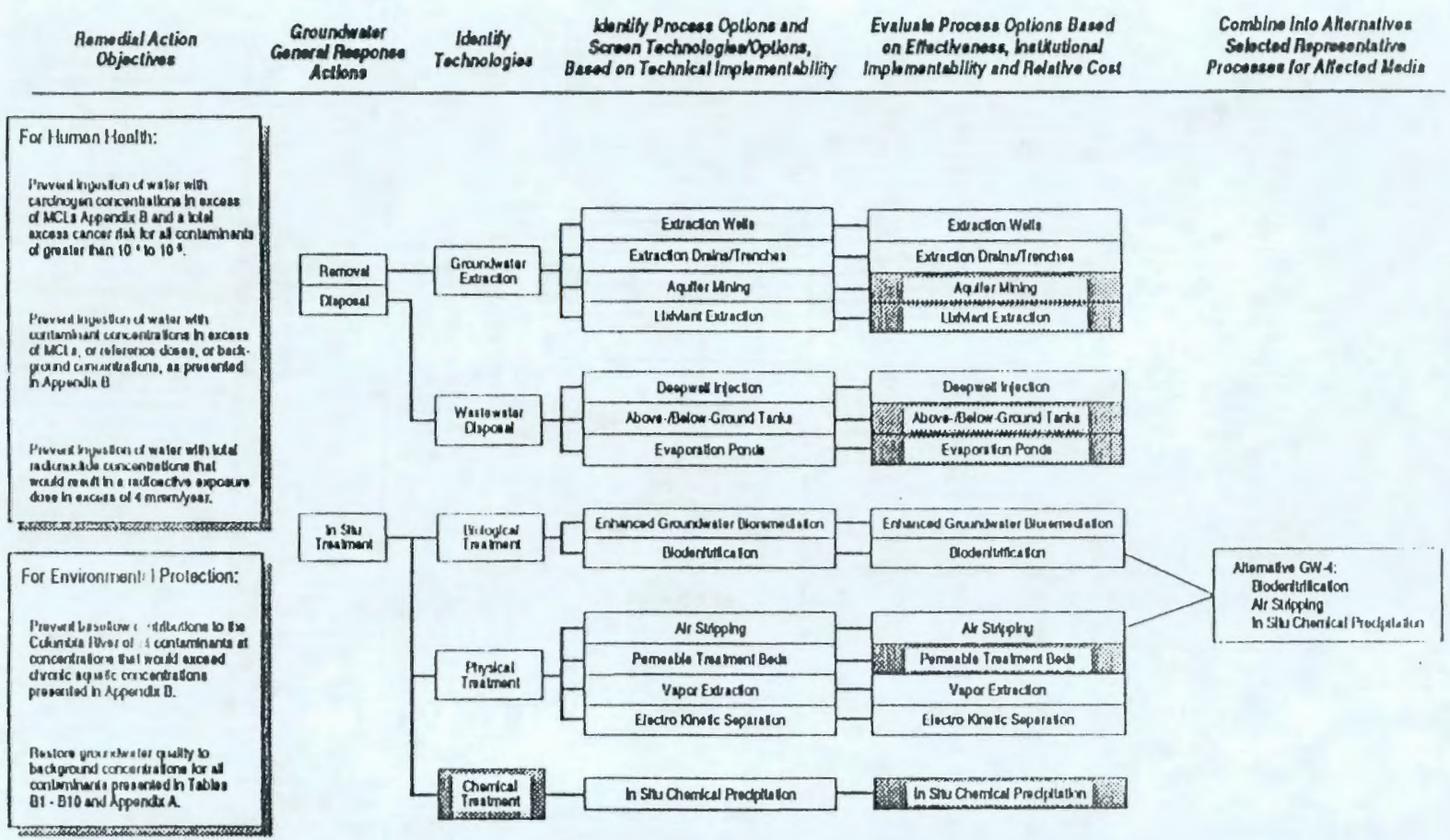


Figure 5-2. Development of Alternatives for Groundwater (Page 2 of 4)



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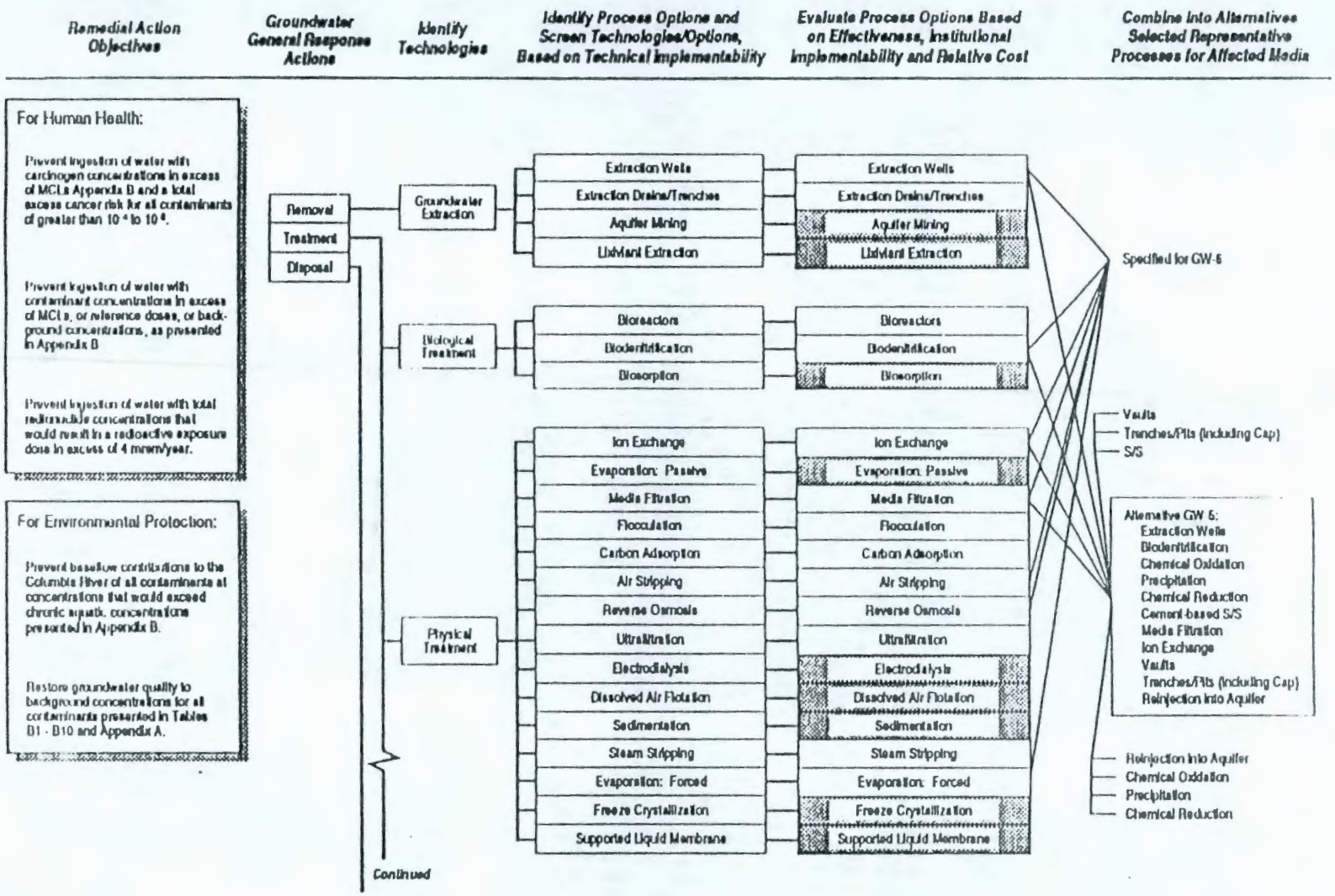

Figure 5-2. Development of Alternatives for Groundwater (Page 4 of 4)

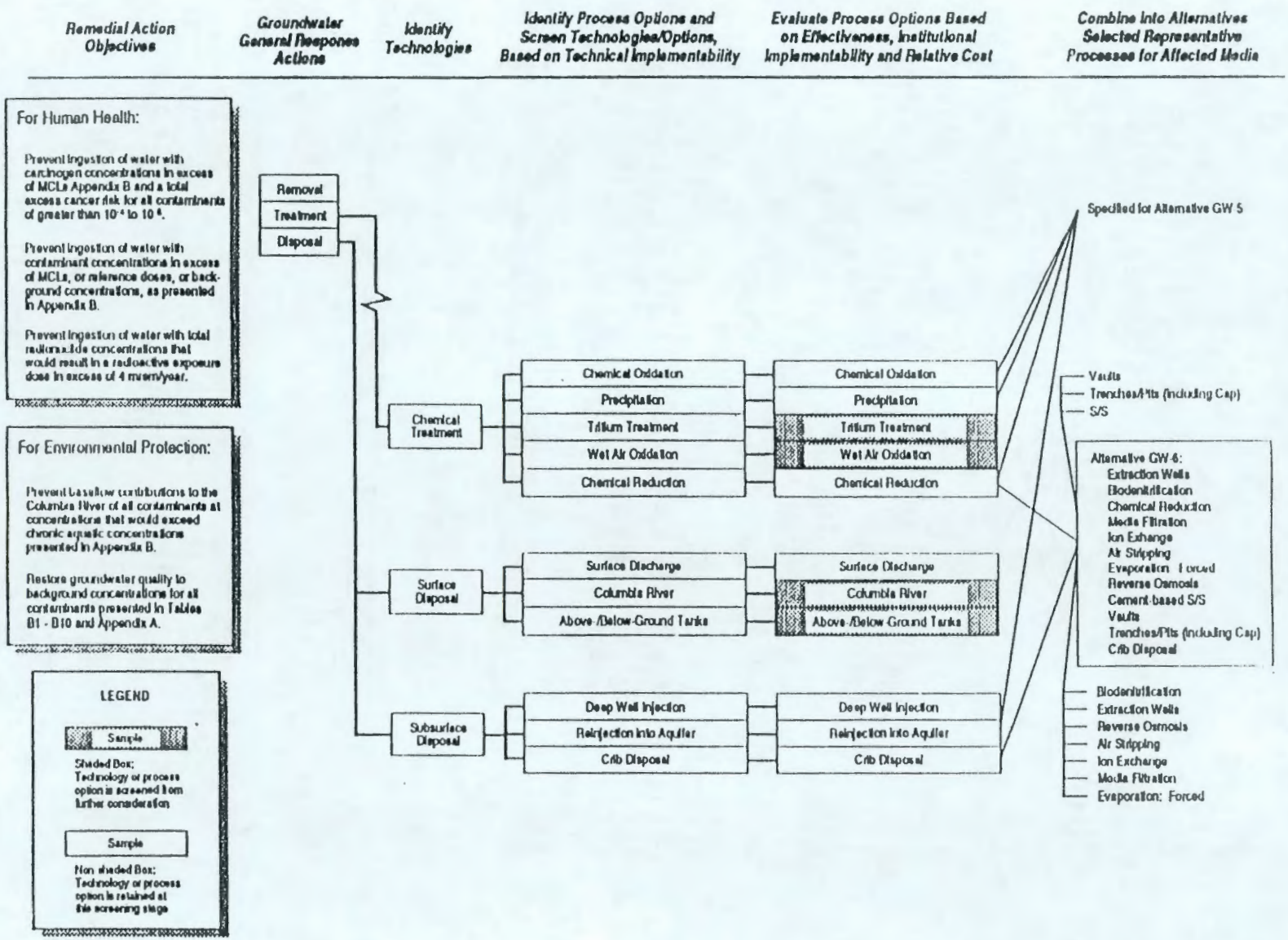

Figure 5-3. Development of Alternatives for Soil and Riverbank Sediments (Page 1 of 4)

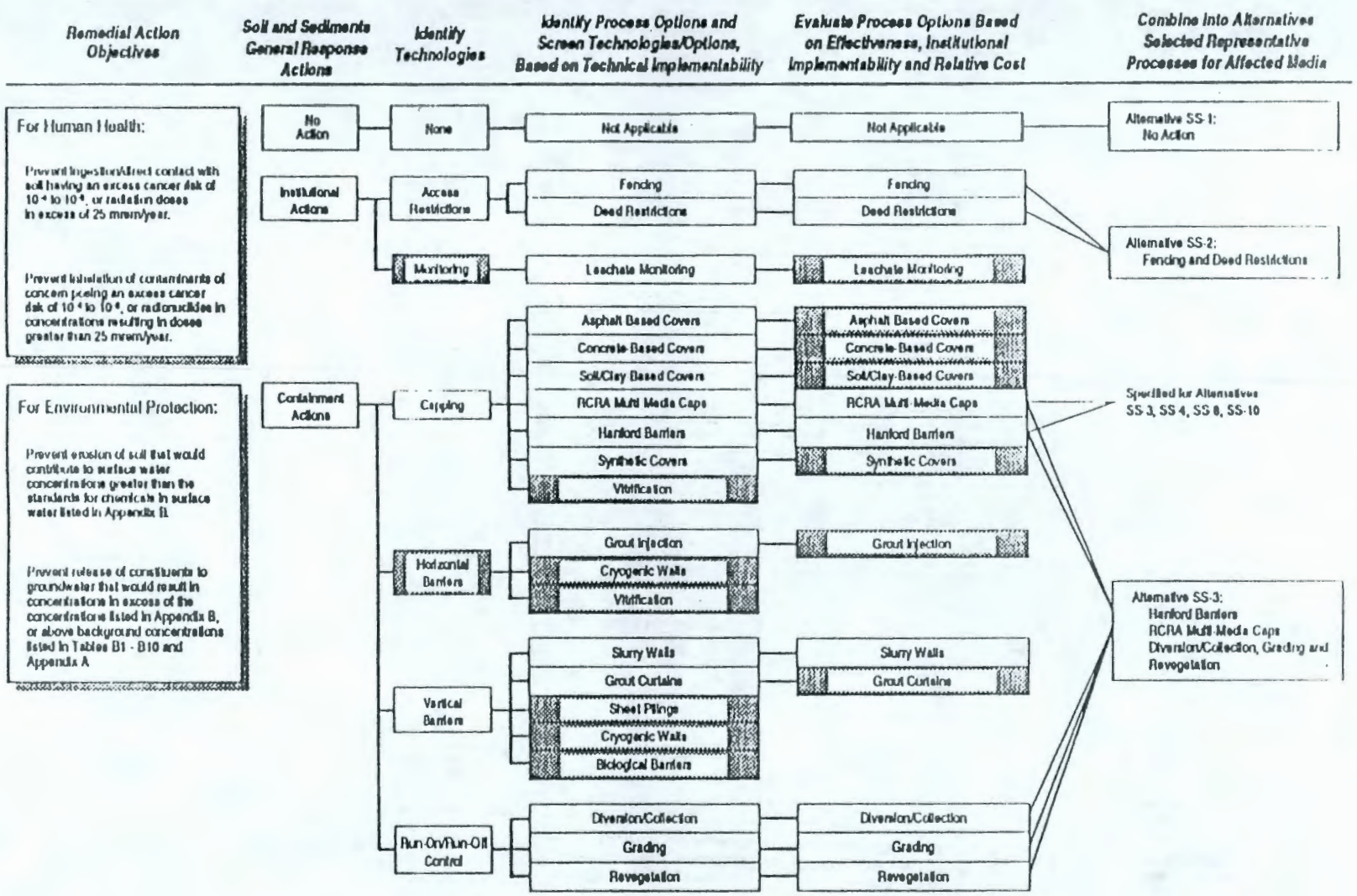

Figure 5-3. Development of Alternatives for Soil and Riverbank Sediments (Page 2 of 4)

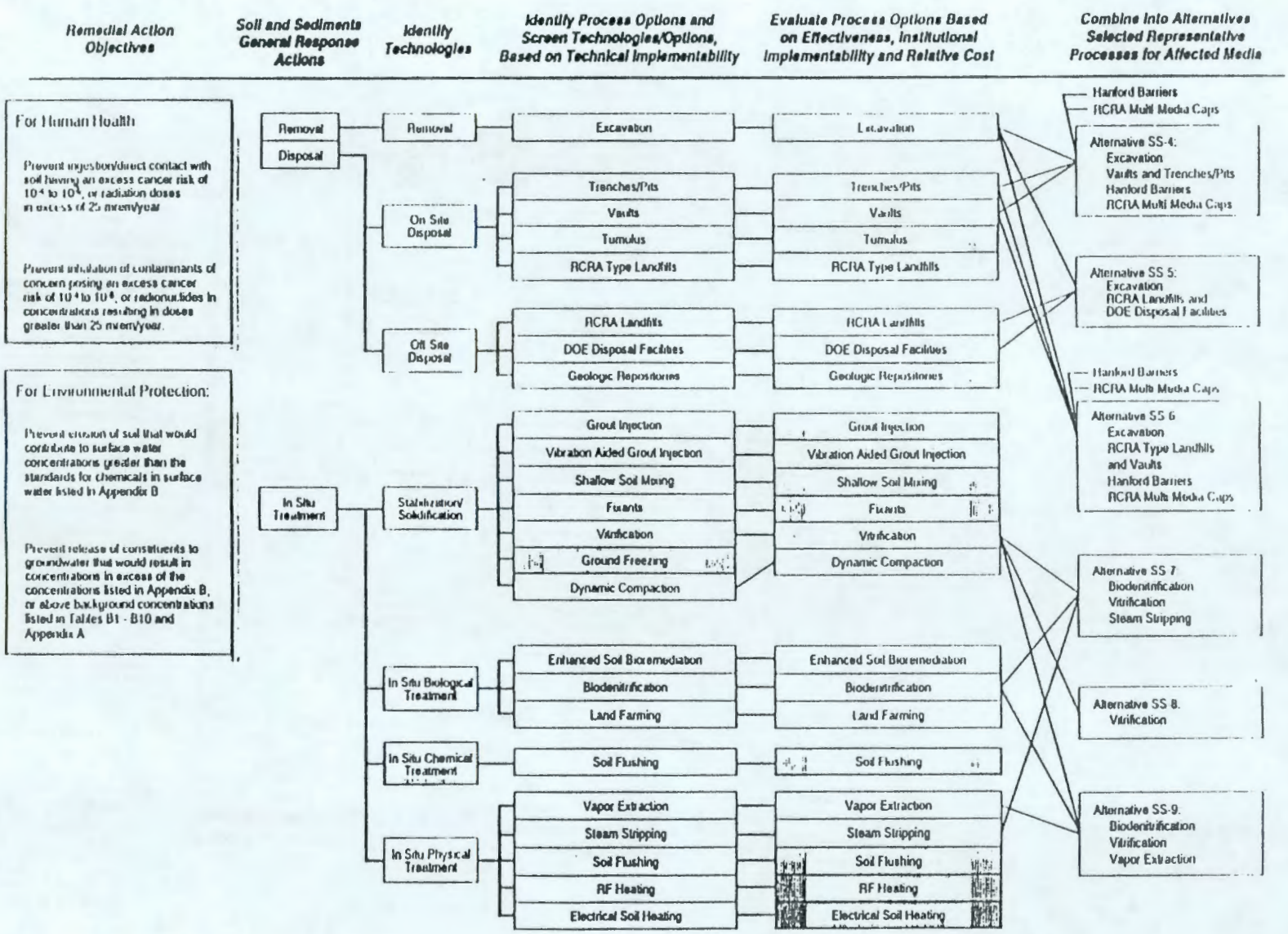

Figure 5-3. Development of Alternatives for Soil and Riverbank Sediments (Page 3 of 4)

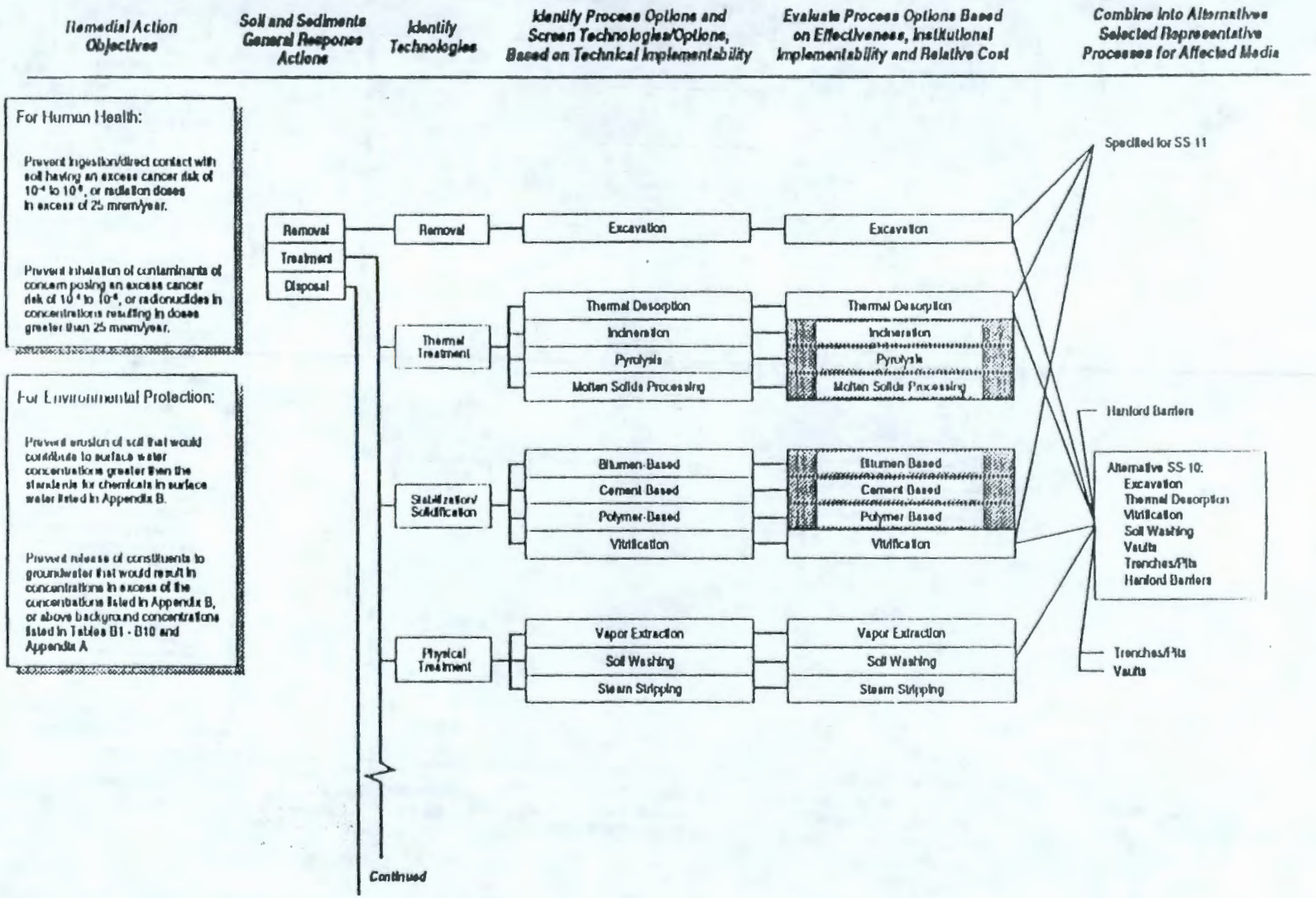

Figure 5-3. Development of Alternatives for Soil and Riverbank Sediments (Page 4 of 4)

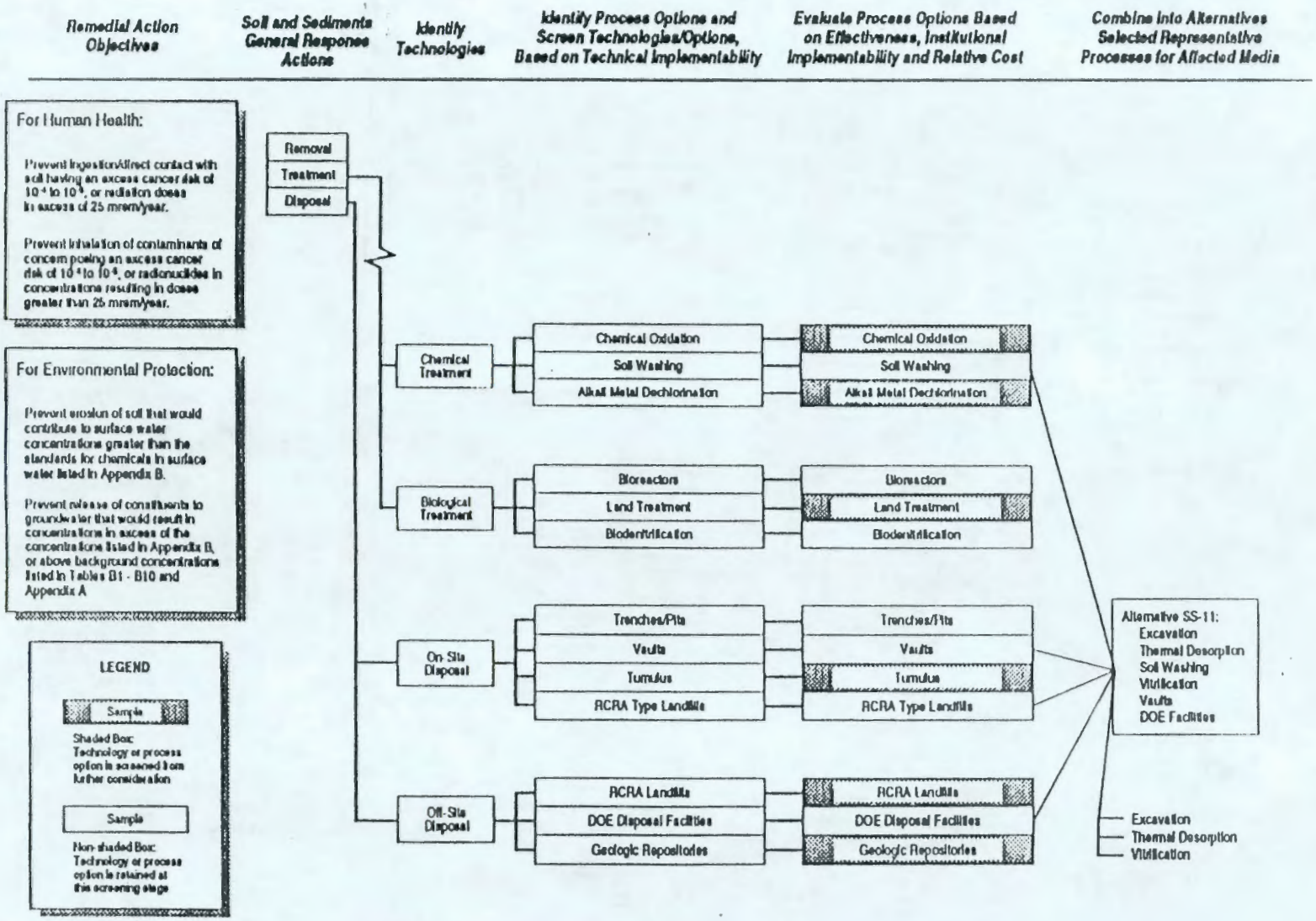

Table 3. 100 Area Alternatives for Solid Wastes

| TECHNOLOGY/PROCESS OPTION | NO ACTION | INSTITUTIONAL ACTION | CONTAINMENT ACTION | REMOVAL/ DISPOSAL ACTION | | | IN SITU TREATMENT ACTION | | REMOVAL/ TREATMENT/ DISPOSAL ACTION | |
|---|---|---|---|---|---|---|---|---|---|---|
| ALTERNATIVE NUMBER | SW-1 | SW-2 | SW-3 | SW-4 | SW-5 | SW-6 | SW-7 | SW-8 | SW-9 | SW-10 |
| Monitoring (100 Area Groundwater) | | • | • | | | | • | • | | |
| Access Restrictions | | • | | | | | | | | |
| Deed Restrictions | | • | | | | | | | | |
| Run-on/Run off Control | | | • | | | | | | | |
| Capping: Hanford Barrier | | | • | • | | | • | • | • | • |
| Capping: RCRA Multi-media Cap | | | • | • | | | • | • | | |
| Removal: Excavation/Demolition | | | | • | • | • | | | • | • |
| Onsite Disposal: Vault, Trench | | | | • | | | | | • | • |
| Onsite Disposal: Vault, RCRA-Type Landfill | | | | | | • | | | | |
| Offsite Disposal | | | | | • | | | | | |
| Physical Treatment: Dynamic Compaction | | | | | | | • | | | |
| Stabilization/Solidification: Vibration-Aided Grout Injection | | | | | | | • | • | | |
| Treatment: Thermal Desorption | | | | | | | | | • | |
| Treatment: Size Reduction by Compaction | | | | | | | | | • | |
| Stabilization/Solidification: Cement-based | | | | | | | | | • | |
| Treatment: Incineration | | | | | | | | | | • |
| Stabilization/Solidification: Bitumen-based | | | | | | | | | | • |

• Indicates technology/option is selected for the alternative

Table 4. 100 Area Alternatives for Groundwater

| TECHNOLOGY/PROCESS OPTION | NO ACTION | INSTITUTIONAL ACTION | CONTAINMENT ACTION | IN SITU TREATMENT ACTION | REMOVAL/TREATMENT/ DISPOSAL ACTION | |
|---|---|---|---|---|---|---|
| ALTERNATIVE NUMBER | GW-1 | GW-2 | GW-3 | GW-4 | GW-5 | GW-6 |
| Monitoring | | • | • | • | • | • |
| Water-rights Restrictions | | • | | | | |
| Deed Restrictions | | • | | | | |
| Alternate Water Supply | | • | | | | |
| Vertical Barrier: Slurry Walls | | | • | | | |
| Hydraulic Control: Extraction Wells | | | • | | | |
| Biological Treatment: Biodenitrification | | | | • | • | • |
| Physical Treatment: In Situ Air Stripping | | | | • | | |
| Removal: Extraction Wells | | | | | • | • |
| Chemical Treatment: Chem. Oxidation | | | | | • | |
| Chemical Treatment: Precipitation | | | | | • | |
| Chemical Treatment: Chemical Reduct. | | | | | • | |
| Physical Treatment: Media Filtration | | | | | • | • |
| Physical Treatment: Ion Exchange | | | | | • | |
| Stab./Solidif.: Cement-based | | | | | • | • |
| Disposal: Reinjection into Aquifer | | | | | • | |
| Physical Treatment: Air Stripping | | | | | | • |
| Physical Treatment: Forced Evaporation | | | | | | • |
| Physical Treatment: Reverse Osmosis | | | | | | • |
| Disposal: Crib Disposal | | | | | | • |

• Indicates technology/option is selected for the alternative

Table 5. 100 Area Alternatives for Soil/Riverbank Sediments

| TECHNOLOGY/PROCESS OPTION | NO ACTION | INSTITUT. ACTION | CONTAIN. ACTION | REMOVAL/ DISPOSAL ACTION | | | IN SITU TREATMENT ACTION | | | REMOVAL/ TREATMENT/ DISPOSAL ACTION | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| ALTERNATIVE NUMBER | SS-1 | SS-2 | SS-3 | SS-4 | SS-5 | SS-6 | SS-7 | SS-8 | SS-9 | SS-10 | SS-11 |
| Monitoring (100 Area Groundwater) | | • | • | | | | • | • | • | | |
| Access Restrictions | | • | | | | | | | | | |
| Deed Restrictions | | • | | | | | | | | | |
| Run-on/Run-off Control: Grading, Diversion/collection, Revegetation | | | • | | | | | | | | |
| Capping: Hanford Barrier | | | • | • | | • | | | | • | • |
| Capping: RCRA Multi-media Cap | | | • | • | | • | | | | | • |
| Removal: Excavation/Demolition | | | | • | • | • | | | | • | • |
| Onsite Disposal: Vault, Trench | | | | • | | | | | | • | • |
| Onsite Disposal: Vault, RCRA-Type Landfill | | | | | | • | | | | | |
| Offsite Disposal | | | | | • | | | | | | • |
| Biological Treatment: Biodenitrification | | | | | | | • | | • | | |
| Stabilization/Solidification: Vitrification | | | | | | | • | • | • | • | • |
| Physical Treatment: Steam Stripping | | | | | | | • | | | | |
| Physical Treatment: Vapor Extraction | | | | | | | | | • | | |
| Thermal Treatment: Thermal Desorption | | | | | | | | | | • | • |
| Physical Treatment: Soil Washing by Attrition Scrubbing | | | | | | | | | | • | |
| Chemical Treatment: Soil Washing by Chemical Leaching | | | | | | | | | | | • |

• Indicates technology/option is selected for the alternative



9513338.1424 RL-92-11, Rev. 0

Table 6. Phase II Screening Results: Recommended Alternatives Page 1 of 2

| Media | Retained Alternative | Description |
|---|---|---|
| Solid Waste | SW-1 | No Action General Response: No Action |
| | SW-2 | Institutional Controls General Response: Access/Deed Restrictions |
| | SW-3 | Containment Response: Run-on/run-off Control; Hanford Barrier/RCRA Multi-media Cap |
| | SW-4 | Removal/Disposal Response: Excavation/Demolition; Vault/Trench Disposal; Hanford Barrier/RCRA Multi-media Cap |
| | SW-7 | In situ Treatment Response: Dynamic Compaction; Vibration-aided Grout Injection; Hanford Barrier/RCRA Cap |
| | SW-9 | Removal/Treatment Disposal Response: Excavation/Demolition; Thermal Desorption; Compaction; Cement Based Stabilization/Solidification; Vault/Trench Disposal; Hanford Barrier |
| Groundwater | GW-1 | No Action General Response: No Action |
| | GW-2 | Institutional Controls General Response: Water Rights/Deed Restrictions; Alternate Water Supply |
| | GW-3 | Containment Response: Slurry Walls; Extraction Wells |
| | GW-4 | In situ Treatment Response: Biodenitrification; Air Stripping |
| | GW-5 | Removal/Treatment/Disposal Response (based on chemical treatment): Extraction Wells; Biodenitrification; Chemical Oxidation; Chemical Precipitation; Chemical Reduction; Media Filtration; Ion Exchange; Cement-based Stabilization/Solidification; Aquifer Reinjection |
| | GW-6 | Removal/Treatment/Disposal Response (based on physical treatment): Extraction Wells; Biodenitrification; Media Filtration; Reverse Osmosis; Evaporation; Cement-based Stabilization/Solidification; Crib Disposal |

Table 6. Phase II Screening Results: Recommended Alternatives Page 2 of 2

| Media | Retained Alternative | Description |
|---|---|---|
| Soils/ Riverbank Sediments | SS-1 | No Action General Response: No Action |
| | SS-2 | Institutional Controls General Response: Access/Deed Restrictions |
| | SS-3 | Containment Response: Run-on/run-off Control; Hanford Barrier/RCRA Cap |
| | SS-4 | Removal/Disposal Response: Excavation/Demolition; Vault/Trench Disposal; Hanford Barrier/RCRA Multi-media Cap |
| | SS-8 | In situ Treatment Response: In situ Vitrification |
| | SS-10 | Removal/Treatment Disposal Response: Excavation/Demolition; Thermal Desorption; Soil Washing By Attrition Scrubbing; Vitrification Stabilization/Solidification; Vault/Trench Disposal; Hanford Barrier |

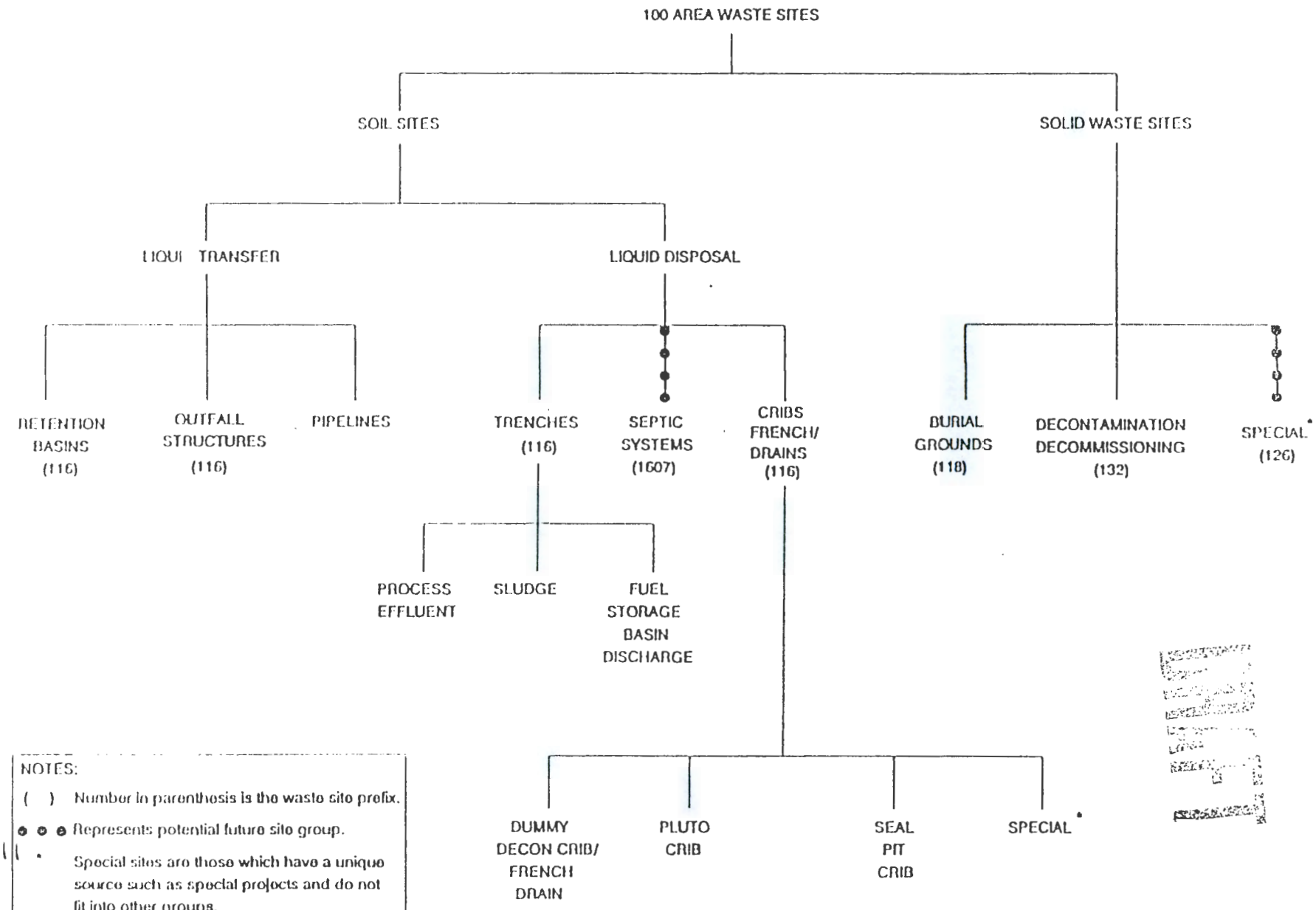


Figure 1-4 Analogous Waste Sites





9513338.1426

3.0 Waste Site Group Development

- 100 Area Waste Sites (Soil Sites/ Solid Waste Sites)

Tal

| Alternatives | | Technologies Included | Waste Site Group | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Retention Basins | Sludge Trenches | Fuel Storage Basin Trenches | Process Effluent Trenches | Pluto Cribs | Decon Cribs/ French Drains | Seal Pit Cribs | Pipelines | Outfall Structures | Burial Grounds |
| No Action | SS-1 SW-1 | None | | | | | | | | | | |
| Institutional Controls | SS-2 SW-2 | Deed Restrictions | | | | | | | X | | | |
| | | Groundwater Monitoring | | | | | | | X | | | |
| Containment | SS-3 SW-3 | Surface Water Controls | | | | | | X | | X | X | X |
| | | Modified RCRA Barrier | | | | | | X | | X | X | X |
| | | Deed Restrictions | | | | | | X | | X | X | |
| | | Groundwater Monitoring | | | | | | X | | X | X | |
| Removal, Disposal | SS-4 SW-4 | Removal | X | X | X | X | X | X | | X | X | |
| | | Disposal | X | X | X | X | X | X | | X | X | |
| In Situ Treatment | SS-8A | Surface water controls | | X | | X | X | X | | | | |
| | | In situ vitrification | | X | | X | X | X | | | | |
| | | Groundwater monitoring | | X | | X | X | X | | | | |
| | | Deed restrictions | | X | | X | X | X | | | | |
| | SS-8B | Void grouting | | | | | | | | X | | |
| | | Modified RCRA Barrier | | | | | | | | X | | |
| | | Surface water controls | | | | | | | | X | | |
| | | Deed Restrictions | | | | | | | | X | | |
| | | Groundwater Monitoring | | | | | | | | X | | |
| | SW-7 | Dynamic Compaction | | | | | | | | | | X |
| | | Modified RCRA Barrier | | | | | | | | | | X |
| | | Surface water controls | | | | | | | | | | X |
| | | Groundwater monitoring | | | | | | | | | | X |
| | | Deed restrictions | | | | | | | | | | X |
| Removal, Treatment, Disposal | SS-10 | Removal | X | X | X | X | X | X | | X | X | |
| | | Thermal Desorption | | | | | | | | | | |
| | | Soil Washing | X | X | X | X | X | X | | X | X | |
| | | Disposal | X | X | X | X | X | X | | X | X | |
| | SW-9 | Removal | | | | | | | | | | X |
| | | Thermal Desorption | | | | | | | | | | X |
| | | Compaction | | | | | | | | | | X |
| | | ERDF Disposal | | | | | | | | | | X |

Note:

X - Technology applies to this Waste Site Group
blank - Technology does not apply to this Waste Site Group
D&D - Decontaminated and Decommissioned
RCRA - Resource Conservation and Recovery Act
ERDF - Environmental Restoration Disposal Facility

9513308.1427

(ATTACHMENT 6B)

ROD Working Group Meetings

DATE: Tuesday, August 9, 1994
TIME: 10:00 am -- 5:00 pm
PLACE: Tuesday, 2440 Stevens Center, Room 2664

Agenda

The following items will be discussed during the August 9, 1994, meeting.

1. Identify parameters that need to be included in the sensitivity analysis for Alternative Analysis

2. Define scope of ROD with respect to IRMs (incorporation of all waste sites?)

3. Determine approach for writing RODs
   ie. OU specific ROD (high priority sites)
   OU specific ROD (all sites)
   Reactor Area ROD
   Waste Site Type ROD
   Performance based ROD

4. Define mechanisms for ROD modifications

5. Define requirements for State Level RODs

6. Define format and content of proposed plan

7. Develop schedule of deliverables

Follow up meetings are scheduled for August 16 and 23, 1994, at 2440 Stevens Center, room 1600.

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(ATTACHMENT 7A)

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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 13 1994

RCB-120

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Roger F. Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Stanley:

100-DR-1 OPERABLE UNIT (OU) SOIL WASHING TREATABILITY STUDY MILESTONE SCHEDULE EXTENSION REQUEST

The purpose of this letter is to officially inform the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) that the U.S. Department of Energy, Richland Operations Office (RL) will not complete pilot scale treatability study activities in the 100-DR-1 OU by August 31, 1994, per Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-15-07B. Enclosed please find Tri-Party Agreement Change Control Form M-15-94-05 submitted by RL to Ecology and EPA requesting a schedule extension to complete M-15-07B, per Tri-Party Agreement Article XL, Extensions, addressing provisions of Paragraphs 119 and 120. The remainder of this letter summarizes RL's demonstration of good cause for the M-15-07B schedule extension request, and rationale for RL, Ecology, and EPA 100-DR-1 OU Unit Manager agreement of modified and enhanced work scope to additionally justify Ecology and EPA approval of the schedule extension request.

OU Managers for the 100-DR-1 OU from RL, Ecology, and EPA agreed that completion of a pilot scale soil washing treatability test by August 31, 1994, would complete M-15-07B. In November 1993, RL provided data from completed bench scale soil washing treatability tests on samples collected from the 116-C-1 and 116-D-1B trenches to Ecology and EPA for review. In December 1993, upon completion of review of the data, RL, Ecology, and EPA 100-DR-1 OU Managers (Eric Goller, Ted Wooley, and Paul Beaver) agreed there was sufficient evidence to warrant a pilot scale soil washing treatability test. In January 1994, RL presented proposed work scope to Ecology and EPA 100-DR-1 OU Managers for the pilot scale test to be located at the 116-D-1B trench, including a process flow diagram for a pilot-scale system for use on these soils. In February 1994, the current 100-DR-1 OU Managers for RL, Ecology, and EPA (Glenn Goldberg, Phil Staats, and Paul Beaver, respectively) agreed on the work scope to complete M-15-07B, including the process flow diagram. This flow diagram was the starting point for the Westinghouse Hanford Company (WHC) acquiring required equipment and/or services to conduct the pilot-scale test for RL. WHC sent seven different requests for proposals (RFPs) to vendors of

equipment standard to gravel pit operations (i.e., conveyor belts, spiral classifiers, and dewatering screens) to supplement existing equipment owned by RL on the Hanford Site to assemble a functional soil washing system immediately after documentation of unit manager agreement.

In March 1994, probable delay of equipment purchase and acquisition became apparent. The primary cause of delay was a lack of interested bidders as three RFPs issued to vendors failed to receive a single bid, and bids received on another RFP were considered unresponsive. In follow up calls to vendors who has previously expressed interest in receiving RFPs but failed to submit bids, WHC learned of numerous vendors' strenuous objection to the terms and conditions attached to functional specifications contained in the RFPs. The Federal Acquisition Regulations (FARs) require RL and it's contractors to solicit competitive bids from vendors when acquiring equipment, materials, and/or services. Any action taken by RL and it's contractors to comply with the FARs to solicit competitive bids requires inclusion of terms and conditions in addition to functional specifications. These terms and conditions act as criteria by which bids are evaluated for adequacy and compared to identify, then select, a best bid. A consistent message expressed by vendors was that it was not worth winning contract award for the subject RFPs due to the unreasonable time and resource expenditure necessary to prepare a bid compliant with the RFPs' terms and conditions. Less time, effort, and resource expenditure was required to win contract awards elsewhere.

In April 1994, concurrent with RL's verbal communication with Ecology and EPA 100-DR-1 Unit Managers of the potential procurement delay, WHC aggressively initiated the procurement process a second time by securing a new vendor list of potential bidders to reissue the same RFPs. WHC required acquisition of all equipment in order to conduct the treatability test as scoped. WHC accomplished compilation of a new vendor list by contacting vendors by telephone and explaining exact equipment specifications, and including any vendor on the list expressing interest and capability of supplying the equipment. In addition, all vendors were queried on delivery times and expedited delivery possibilities. To encourage response to the RFPs, WHC contacted the vendors intermittently to answer questions and to reaffirm interest in receiving bids. By April 30, 1994, all RFPs received acceptable bids; however, vendor deliver times on some items exceeded the requested delivery date of May 15, 1994, by as much as 10 weeks, even after expedited delivery incentives were offered.

By examination of scheduled tasks required to complete the scope of the subject soil washing test, RL asserts that despite exercise of reasonable diligence in procurement/acquisition of equipment required to meet work scope originally agreed by RL, Ecology, and EPA 100-DR-1 OU Unit Managers to complete M-15-07B, RL has incurred unrecoverable schedule delays due to compliance with applicable regulations governing contracting, procurement, and acquisition procedures.

Tri-Party Agreement Change Control Form M-15-94-05 is a request for a seven month extension to complete the original work scope defined to complete

M-15-07B (same scope is contained in proposed interim milestone M-15-07E), and it is an agreement to complete additional bench and pilot scale soil washing tests by July 31, 1995, (proposed interim milestones M-15-07F, -07G, and -07H). The purpose of the 116-D-1B trench treatability test work scope is to gain information for RL, Ecology, and EPA to assess the adequacy of soil washing as a viable volume reduction technology on a pilot scale. The purpose of conducting additional tests is to evaluate volume reduction efficiencies on a variety of soil types, levels of contamination, and system design target performance levels. Please note the seven month schedule extension requested for completion of proposed M-15-07E is dependent on many factors including vendor delivery times for all necessary equipment, system assembly time, shakedown testing requirements, availability of limited resources (i.e., operators and technicians) to conduct the test, and weather conditions.

Ecology and EPA approval of Change Control Form M-15-94-05 is not anticipated to delay RL's scheduled submittal of Focused Feasibility Studies or Interim Remedial Measure Proposed Plans to the regulators, and RL maintains there should be no cause to delay regulator issuance of Records of Decision (RODs) for 100 Area OUs. Should Ecology or EPA require removal of a waste site in a ROD, it is recognized by lead RL, Ecology, and EPA 100 Area OU Unit Managers that contingency can be written into 100 Area source OUs RODs allowing use of a contaminated soil volume reduction technology (i.e., soil washing) as a cost efficiency initiative to reduce waste disposal costs. Confidence for continued consideration of soil washing is based on results from bench scale testing. However, all agencies agree there are numerous data gaps and information needs regarding engineering scale up from bench scale to full remediation and financial feasibility issues left unresolved to date. A key issue to resolve is the cost of volume reduction treatment (i.e., soil washing) verses the cost of bulk disposal of contaminated soils. Unit Manager agreement on the work scope for the soil washing pilot scale testing will enable RL to provide information to resolve the issues of engineering scale up and financial feasibility. This agreement of work scope is documented in Change Control Form M-15-94-05, which includes significant expansion of work scope originally defined for M-15-07B.

RL recognizes the need to aggressively proceed with actions to complete work scope originally defined to complete M-15-07B (proposed M-15-07E) and the additional work scope proposed in three additional interim milestones included in Change Control Form M-15-94-05. On April 30, 1994, RL directed WHC to continue procurement of equipment to complete work scope of the test as agreed by RL, Ecology, and EPA 100-DR-1 OU Managers (proposed M-15-07E). In addition, RL will use all available measures to secure remaining FY 1994 funding allocated for 100-DR-1 OU FY 1994 test operations for any additional procurement of equipment required for FY 1995 test operations defined in work scope agreement identified in proposed interim milestones M-15-07G and -07H. It should also be noted that any schedule extension into FY 1995 should take into consideration "Refocusing of the Environmental Restoration Program" efforts to establish a new technical baseline to achieve Environmental Restoration Program objectives.

Please address any comments or questions regarding this correspondence to Mr. Eric Goller on (509) 376-7326 or RL's 100-D Reactor Area source OU Manager Mr. Glenn Goldberg on (509) 376-9552.

Sincerely,

Patrick W. Willison
Acting Hanford Project Manager

END:EDG

cc w/encl:
B. Austin, WHC
S. Balone, EM-442
P. Beaver, EPA
T. Demmitt, BHI
D. Glenn, CH2M Hill
P. Staats, Ecology
T. Wintczak, WHC
EDMC, H6-08

cc w/o encl:
M. Harmon, EM-442
R. Henckel, WHC
J. Monhart, EM-442
D. Nylander, Ecology
J. Patterson, WHC

9513338.1433

| Change Number | Federal Facility Agreement and Consent Order Change Control Form | Date |
|---|---|---|
| M-15-94-05 | Do not use blue ink. Type or print using black ink. | May 13, 1994 |

| Originator | Phone |
|---|---|
| E. D. Goller | 376-7326 |

Class of Change

[ ] I - Signatories [X] II - Project Manager [ ] III - Unit Manager

Change Title

100-DR-1 Operable Unit Treatability Study Milestone Revision (M-15-07B)

Description/Justification of Change

Delete Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-15-07B "Complete 100-DR-1 operable unit (OU) Treatability Study Activities" due August 31, 1994 and replace with the four milestones as shown below:

**M-15-07E** - DOE shall start pilot scale soil washing treatability study activities at the 116-D-1B trench in the 100-DR-1 OU as defined and agreed upon by U. S. Department of Energy, Richland Operations Office (RL), State of Washington Department of Ecology (Ecology), and U. S. Environmental Protection Agency (EPA) 100-DR-1 Unit Managers (Attachment 1) by March 31, 1995.

**M-15-07F** - DOE shall submit a treatability study test report for bench scale soil washing tests on 116-F-4 crib soils by June 10, 1994.

**M-15-07G** - DOE shall complete pilot scale soil washing treatability study activities on soils excavated from the 116-F-4 crib. Completion date: July 31, 1995 [date dependant upon completion of work scope and schedule definition (RL, EPA, and Ecology 100-FR-1 OU Unit Manager agreement required) by July 15, 1994].

**M-15-07H** - DOE shall complete pilot scale soil washing treatability study activities on feed material from two additional sources (approximately 100 cubic yards each) using existing equipment acquired to complete milestones M-15-07E and M-15-07H (no significant additional equipment procurement required) by July 31, 1995 [date dependant upon completion of feed source identification and work scope/schedule definition (RL and regulator feed material source OUs unit manager agreement required) by October 31, 1994].

Good cause for this schedule extension request is unanticipated schedule delays incurred by RL due to compliance with applicable regulations governing contracting, procurement, and acquisition procedures, despite exercise of reasonable diligence in procurement/acquisition of equipment required to meet work scope originally agreed by RL, Ecology, and EPA 100-DR-1 OU Unit Managers. RL, Ecology, and EPA agree the work scope and activities required above are necessary to evaluate the soil washing technology as a viable volume reduction treatment technology for potential inclusion in remedial action design.

Impact of Change

This change will delay completion of the current scope of the deleted milestone M-15-07B by eleven months. The scope of work required to complete M-15-07E through M-15-07I will provide detailed information to evaluate the adequacy of soil washing as a viable volume reduction technology for 100 Area OU waste liquid waste disposal sites. Funding in the FY 1995 budget allocation is assumed to be sufficient for conducting field operations to complete test objectives.

Affected Documents

*100 Area Soil Washing Test Plan* (DOE/RL-92-51), and *Hanford Federal Facility Agreement and Consent Order Action Plan*, Appendix D, Work Schedule.

Approvals ___ Approved ___ Disapproved

P. W. Willison _____ _____
DOE Date

D. R. Sherwood _____ _____
EPA Date

R. Stanley _____ _____
Ecology Date

# 100-DR-1 PILOT-SCALE SOIL WASHING TREATABILITY TEST

## 1.0 REQUIREMENTS AND SCOPE

1.1 A shake down test will be performed in which equipment is set up, operating experience is obtained, and operating parameters for the test are selected.

1.2 Field Test #1 will consist of 2 parts: a. wet sieving with water only; and b. by wet sieving and attrition scubbing with water only. Processes will include a trommel, screens, attrition scrubber, dewatering screens, a clarifier, and recycling of process water.

1.3 Field Test #2 will be the same as Test #1 except a mixture of 0.5 M ammonium citrate and citric acid (electrolyte) will be added to the attrition scrubber to enhance removal of Cs-137 and inhibit readsorption.

1.4 Field tests will process soil particles < 150 mm (6 in) dia. at 10 ton/hr. Time of processing and amount to be determined by field engineer. The system will operate during normal working hours. WHC estimates 200 tons of processed soil may be an an adequate amount for Test #1 and Test #2 if the system works well. An undetermined amount of soil will be processed in shake-down tests. After the M-15-07-B milestone commitment is met, additional material from 100-DR-1 or other sites may be processed contingent on funding and resources.

1.5 Target Performance Levels (TPL's) for the test will be accessible soil levels for radionuclides included in WHC-CM-7-5, Environmental Compliance Manual (1988) Table 6.2 for:

$^{60}Co$, $^{134}Cs$, $^{137}Cs$, $^{152}Eu$, $^{154}Eu$, $^{155}Eu$, $^{90}Sr$, $^{235}U$, $^{238}U$, $^{239/240}Pu$.

Results of the pilot scale soil washing test at 116-D-1B will evaluate system performance over a range of residuals down to levels listed in the previous revision of the WHC Environmental Compliance Manual conveyed in the Test Plan (DOE/RL-92-15, Rev. 0).

1.6 Due to schedule limitations, the prototype system tested will be made up of on-site EPA equipment used in 300 Area soil washing tests and equipment parts to be procured.

1.7 Offsite TCLP analyses will be conducted in Test #2 for fine soils < 0.25 mm and for 2 mm to 0.25 mm soils. In addition, radiochemical analyses of extract will be performed off-site.

1.8 In addition to field tests, water treatment recycle tests will be conducted in the laboratory using available sediment from the bench scale testing. These include:

Bench scale recycle batch processes where contaminant buildup and other process factors will be assessed. Water treatment will include flocculation and filtration.

Water treatment tests using process effluent from the field tests, and/or ion exchange water treatment.

1.9 Contaminated soils < 0.25 mm will be placed in appropriate containers and handle in accordance with the waste control plan. Remaining soils are to be returned to the site after the test is completed. Process effluent will be treated, if needed to meet purgewater acceptance standards, and evaporated or discharged.

## 2.0 OBJECTIVES AND MEASUREMENTS

2.1 Verify Chemical and radioactivity analyses of processed soils from the pilot scale treatability test are consistent with laboratory scale treatability test results.

2.2 Verify the percent reduction (by wt) that can be achieved for the soils processed is consistent with laboratory indications.

Sieve soils to determine the percent of soil particles in each size fraction before and after processing.

2.3 Assess water treatment requirements and recycling needs, including efficiency of treatment in removing contaminants from process effluent, and contaminant build up.

EPA Level II and V analyses will be conducted for feed water, effluent prior to treatment, and treated effluent samples.

2.4 Provide data on performance of the process equipment to allow scale-up to a full-scale system (eg. 100 ton/hr).

- Determine operating utility requirements (chemical consumption, power, water etc.)
- Record Settings of Equipment Controls
- Determine Energy Input Requirements.
- Determine Soil Water feed ratios, chemical ratios, pressure, flow rates, etc.

2.5 Assess emmissions and/or environmental impacts.

Record and report ALARA practices, air monitoring results, exposure levels, if any, detected by Health Physics Personnel.

2.6 Use real time radiation monitors

Install sodium iodide detectors to monitor processed soils. Data will be used as needed to make field changes required to improve system performance, and to assess the viability of real time monitors for process control.

# 116-D-1B SOIL WASHING TEST

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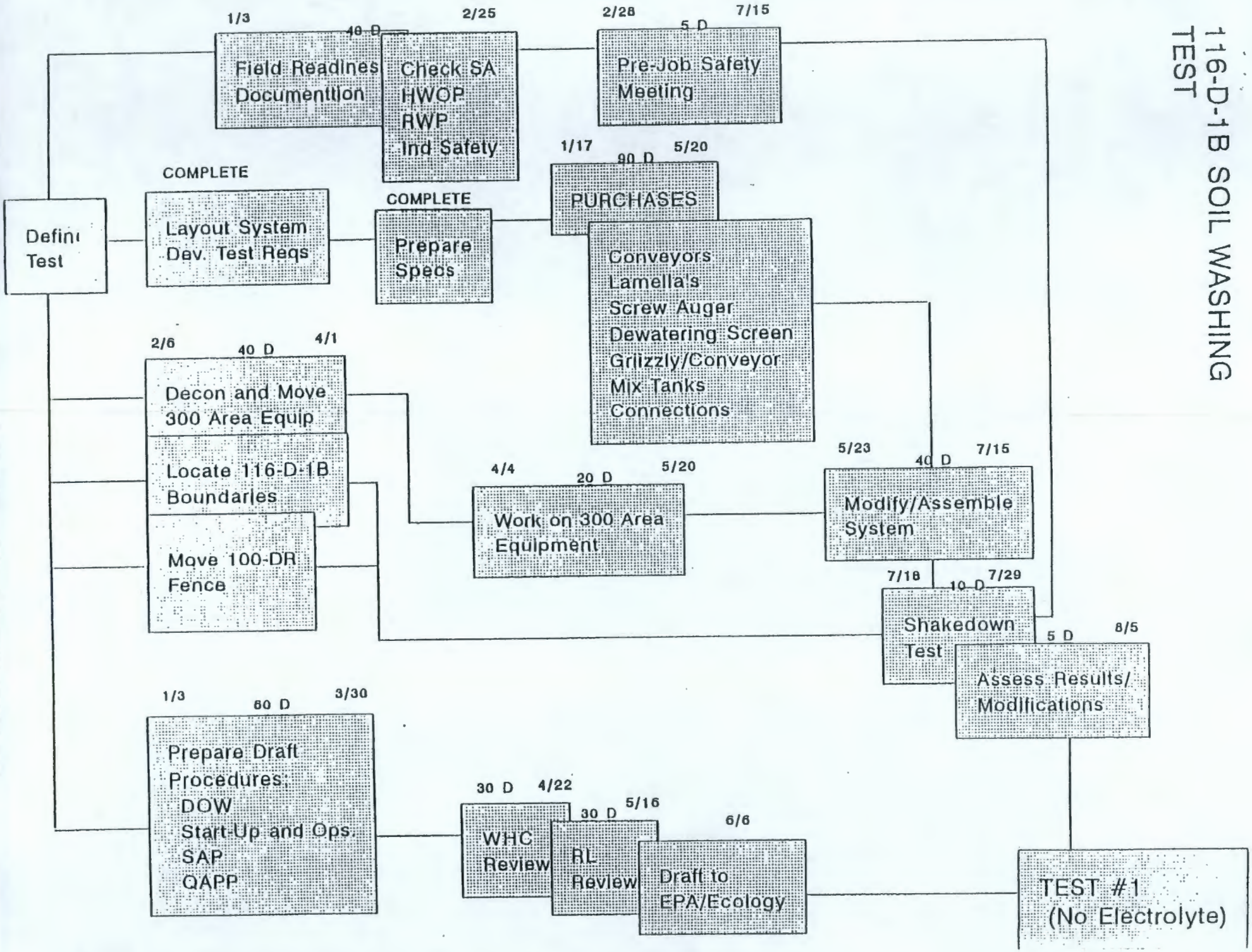
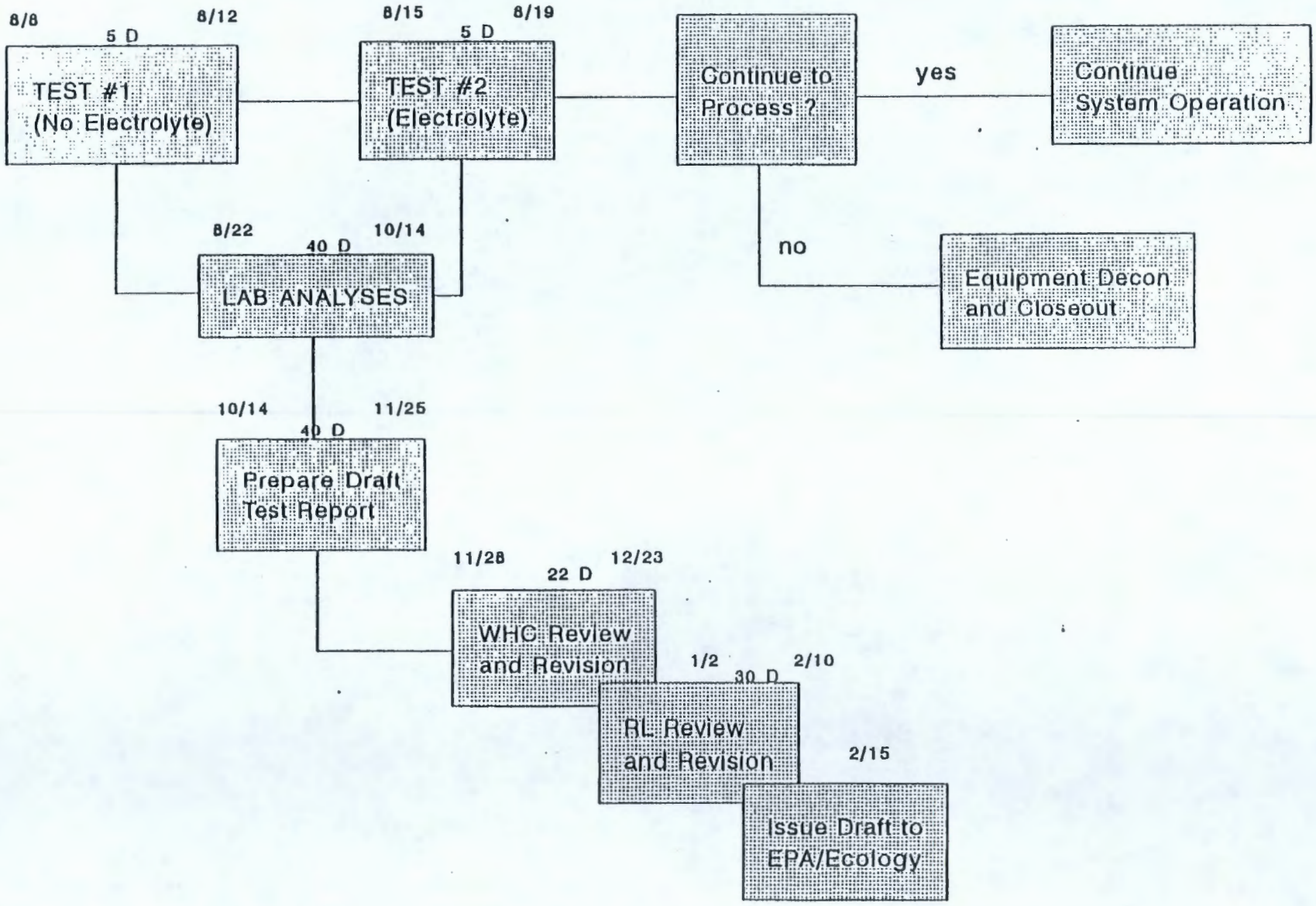


# 116-D-1B SOIL WASHING TEST

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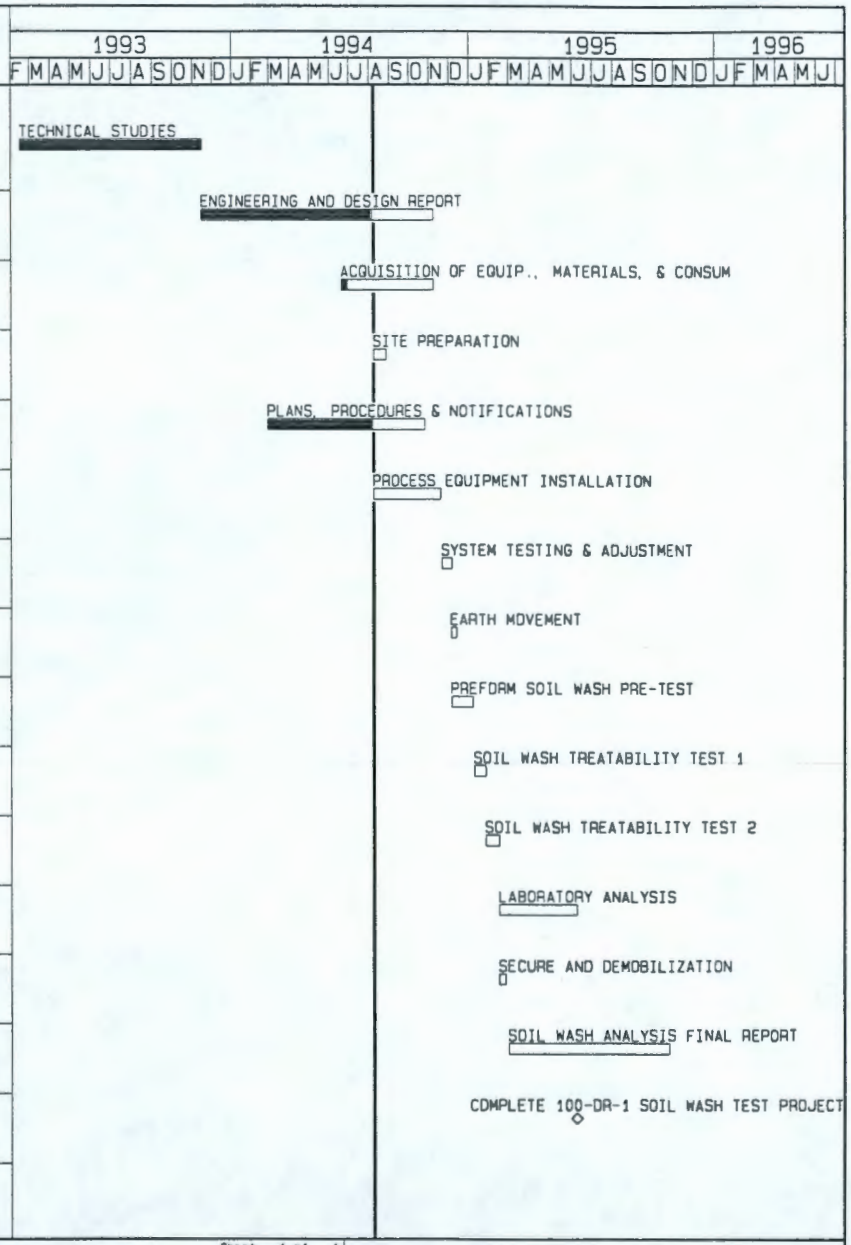
(ATTACHMENT 7 B)

| ACTIVITY ID | ACTIVITY DESCRIPTION | EARLY START | EARLY FINISH |
|---|---|---|---|
| 01 | TECHNICAL STUDIES | 15FEB93A | 15NOV93A |
| 02 | ENGINEERING AND DESIGN REPORT | 15NOV93A | 7NOV94 |
| 03 | ACQUISITION OF EQUIP., MATERIALS, & CONSUM | 20JUN94A | 7NOV94 |
| 04 | SITE PREPARATION | 8AUG94 | 26AUG94 |
| 05 | PLANS, PROCEDURES & NOTIFICATIONS | 28FEB94A | 25OCT94 |
| 06 | PROCESS EQUIPMENT INSTALLATION | 8AUG94 | 18NOV94 |
| 07 | SYSTEM TESTING & ADJUSTMENT | 21NOV94 | 5DEC94 |
| 08 | EARTH MOVEMENT | 5DEC94 | 12DEC94 |
| 09 | PREFORM SOIL WASH PRE-TEST | 6DEC94 | 6JAN95 |
| 10 | SOIL WASH TREATABILITY TEST 1 | 9JAN95 | 25JAN95 |
| 11 | SOIL WASH TREATABILITY TEST 2 | 26JAN95 | 14FEB95 |
| 12 | LABORATORY ANALYSIS | 15FEB95 | 8JUN95 |
| 14 | SECURE AND DEMOBILIZATION | 15FEB95 | 23FEB95 |
| 19 | SOIL WASH ANALYSIS FINAL REPORT | 1MAR95 | 25OCT95 |
| 20 | COMPLETE 100-DR-1 SOIL WASH TEST PROJECT | | 8JUN95 |




Plot Date 8AUG94
Data Date 8AUG94
Project Start 15FEB93
Project Finish 25OCT95

(c) Primavera Systems, Inc.

Activity Bar/Early Dates
Critical Activity
Progress Bar
Milestone/Flag Activity

SOIL

Sheet 1 of 1

100-DR-1 PILOT PROJECT
SOIL WASHING TREATABILITY STUDY
BECHTEL HANFORD Inc.

| Date | Revision | Checked | Approved |
|---|---|---|---|

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