

Environmental
Restoration
Contractor

ERC Team

Meeting Minutes

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OU: 100-NR-1, 100-NR-2

TSD: N/A

ERA: N/A

Subject Code: 8240

SUBJECT COMMENT RESOLUTION MEETING FOR THE RECORD OF DECISIONS FOR THE 100-NR-1 TREATMENT, STORAGE, AND DISPOSAL UNITS AND THE 100-NR-1 AND 100-NR-2 OPERABLE UNITS

TO Distribution

-FROM Ella T. Coenenberg *ETC*

DATE February 4, 1999

ATTENDEES

J. W. Badden H9-03
E. T. Coenenberg H9-03
J. W. Donnelly B5-18
D. A. Faulk B5-01
G. I. Goldberg H0-12
B. Mukherjee H0-17
D. E. Olson H0-12
P. R. Staats B5-18
A. C. Tortoso H0-12
B. L. Vedder H0-02
C. Ward H9-01

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Attendees
R. L. Donahoe H0-17
S. J. Ingle H9-01
Document and Information Services H0-09



A meeting on the above subject was held on January 12, 1999, at 3350 G W Way, Room 2D03.

The comments and resolutions for the interim Record of Decision (ROD) for the 100-NR-1 Treatment, Storage, and Disposal (TSD) Units followed by the interim ROD for the 100-NR-1 and 100-NR-2 Operable Units (OU) are documented below. Unless otherwise noted, comments were agreed to by the attending parties as stated.

100-NR-1 TSD Units

Page i, the 1st paragraph: The paragraph does not include any information concerning groundwater. Phil Staats, Washington State Department of Ecology (Ecology), felt that this needed to be included. Dennis Faulk, U.S. Environmental Protection Agency (EPA), does not agree that this needs to be in the TSD Unit ROD, because it is covered under the 100-NR-1/100-NR-2 OU. It was agreed that this would be flagged for future debate between the regulators.

Page i: EPA questioned why a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) ROD is being issued for Resource Conservation and Recovery Act (RCRA) TSD Units. It was agreed that a second paragraph will be added to the "Statement of Basis and Purpose" to address this issue.

Page ii, 3rd paragraph, 2nd sentence: Revise to state that no action is for soils associated with the 120-N-1 and 120-N-2 TSD units.

Page iii, 1st bullet: Define the term *balancing factor*.

Page iii, last bullet: Revise the bullet to include the language from page 17, left column, of the Proposed Plan (PP).

Page iii, under the heading "120-N-1, 120-N-2, and 100-N-58", 2nd sentence: Add reference to EPA's 15 mrem standard.

Page iii, 2nd paragraph, 2nd bullet: EPA stated that they do not want "no action" sites discussed in a CERCLA ROD. Janet Badden, Environmental Restoration Contractor (ERC), stated that, since these sites were included in the proposed plan, a permit modification would be required if the no action sites are removed from the ROD. Although there are no hazardous constituents in the no action sites that need to be disposed at the Environmental Restoration Disposal Facility (ERDF), there are liners, fencing material, and piping that need to be disposed. After much discussion on this subject, it was agreed that the 2nd bullet in the 2nd paragraph on page iii will be modified to say treat as necessary and dispose of waste in ERDF or as appropriate. The ROD will more closely reflect what was stated in the PP, including references to confirmatory sampling requirements.

Page iii, 2nd paragraph, 3rd bullet: Add the radiation component and clarify sampling requirements. The appropriate sentences will be taken from the proposed plan.

Page iv, 1st paragraph, last sentence, et. al.: Delete the 2nd and 3rd sentences before the last sentence.

Page iv, 1st paragraph, last sentence: Revise to state that the corrective actions have been incorporated into the RCRA permit, and they are the same as the remedial actions defined in this ROD.

Page iv, 2nd paragraph, last sentence: Delete the last sentence under the heading "Statutory Determinations".

Page iv, last paragraph: Delete the 2nd sentence, and "however" in the 3rd sentence.

Signature Pages: The signatories need to be changed to reflect the current personnel changes.

Page 7 and 8: The Administrative Record for EPA and Ecology is not required, delete references. Correct the address for the public reading room..

Page 9, 1st sentence: Delete this sentence.

Page 9, 2nd sentence: Delete the word *Therefore*.

Page 9, 5th sentence: Change *will be* to *has been*.

Page 9, under the heading "Site Characteristics": Add the Corrective Measures Studies (CMSs) as

references and delete all other references.

Page 10, 2nd paragraph: Delete the last 2 sentences that reference the figures contained in the CMS.

Page 11, last sentence under the "UPR-100-N-31" heading: Revise the last sentence to say "performed to today's cleanup standards."

Page 14 and 15, Prior Studies: Either delete all the references or update to current status. Note: References were deleted.

Page 15, "Periodic Reports and 100 Area Studies" headings: Delete wording in parentheses.

Page 19, partial paragraph starting with "Sixty-six Cold War era buildings...": Delete or clarify this information concerning historical data. Note: Clarifying information was added.

Page 19, 1st paragraph under the heading "Summary of Site Risks": Change the font size to be consistent with the rest of the ROD.

Page 19, last paragraph, last sentence: Change *target date* to *milestone*.

Page 20, 2nd paragraph, last sentence: Delete the word *streamlined*.

Page 20, 4th paragraph: Delete last sentence.

Page 22, et. al.: EPA suggested that the term *CRCIA ranger/industrial scenario* should either be defined or deleted. After discussion, it was agreed that all references to this ranger/industrial scenario will be taken out of the ROD.

Page 23, 2nd paragraph: Include a sentence to the effect, "Even under conservation nature, these sites still pose potential risk to human health."

Page 25, 2nd bullet: Define the term *shallow subsurface soil*.

Page 25, 3rd bullet: Change the term *inorganic* to *nonradioactive chemical*.

Page 26, 4th bullet: Change the term *inorganic* to *nonradioactive chemical*.

Page 26, 4th bullet: Spell out the acronym *AWQC*, as this is the first time it appears in the document.

Page 26, 2nd sentence, under the "Residual Risks Post-Achievement of Remedial Action Objectives (RAOs) heading": Change the term *inorganic* to *nonradioactive chemical*.

Page 26, under the "Residual Risks Post-Achievement of Remedial Action Objectives (RAOs)" heading, last sentence: Replace the word *approximately* with *at least*.

Page 35, paragraph concerning National Environmental Policy Act (NEPA) Evaluation: EPA requested deletion of this paragraph. After discussion, it was agreed that this paragraph would remain in the ROD until Glenn Goldberg, RL, could check into the need for a NEPA evaluation to be included in the ROD. Note: RL provided language to replace the current evaluation.

Page 35, 2nd paragraph under the "Selected Remedy" heading: Revise to further clarify what the action is for those units.

Page 36, #1: Change *Operations and Maintenance (O&M) Plan* to *Sampling and Analysis Plan (SAP)*.

Page 36, #2(c): Flag for further discussion. EPA feels public review is needed if RAOs are not met.

Page 37, #8 and #10: EPA and Ecology commented that these paragraphs do not read well and should be rewritten. Glenn Goldberg, RL, took the action to further discuss with his management the institutional controls issue. Note: After the meeting RL determined that no revision will be made regarding the institutional controls.

Page 37, #2 and #3: Revise as discussed earlier on page iii.

Page 38, 3rd paragraph: Remove reference to CRCI ranger/industrial scenario.

Page 41: EPA commented that under the "To Be Considered" portion, the EPA Memorandum may be taken out at a later date but will be left in at this time.

Page 42, "Documentation of Significant Changes" heading: Add Ecology.

100-NR-1 and 100-NR-2 OUs

Page i: Delete the reference to 81 CERCLA sites and explain why a CERCLA ROD is being issued for RCRA sites.

Page iii, 3rd paragraph, 2nd sentence: Add *goal of* before *selected*; replace *remedies* with *remedial actions*.

Page iii, 4th paragraph: Delete the term *final* before *remedy* and *actions*.

Page iii, Table 1: Fit the table on one page.

Page iv, et. al: Delete all references to the ranger/industrial scenario from the ROD.

Page iv, et. al: The issue on "institutional controls" applies in this ROD as discussed with respect to the TSD Unit ROD. Glenn Goldberg has the action.

Page iv, under the heading "Institutional Controls at the Shoreline Site": Delete 2nd sentence and add a sentence to reflect the action is an interim action and the final action is deferred pending on the actions in the 100-NR-2 OU.

Page v, 1st paragraph under "100-NR-2 Groundwater Operable Unit" heading: Clarify the term *insufficient information* by adding *regarding appropriate technologies – receptors* after *insufficient information*.

Page v, paragraph under "Impact of the Remedial Action Decision on the RCRA Permit": Change the words *will be* to *has been*.

Page vi, 2nd paragraph, 2nd sentence after "contaminated soils": Add *such as soil washing*.

Page vi, last paragraph: Delete the word *standard* from *EPA guidance standard*. EPA feels that the five year review requirement should be discussed and clarified, however, EPA will discuss with their legal department before changes are made.

Signature Pages: The signatories need to be changed to reflect the current personnel changes.

Page 7 and 8: The Administrative Record for EPA and Ecology is not required, delete references. Correct the address for the public reading room.

Page 8, 1st paragraph after bullets, 5th sentence: Change *will be* to *has been*.

Page 9, 1st paragraph, 2nd sentence: Revise this sentence to reflect the ground water and River protection standards.

Page 9, 1st paragraph, last sentence: Revise to include maximum contaminant level (MCL), and revise the information concerning MCLs for Sr-90.

Page 11, under the "Cultural Resources Review" heading: Delete or clarify the information concerning the historical data, as with the TSD ROD. Note: Clarifying information was added.

Page 15, 3rd paragraph: Delete information in the parentheses

Page 14 through 16, Prior Studies: Either delete all references or update to current status. Note: All references were deleted.

Page 18, under the "100-NR-2 Receptor Pathways" heading: Delete last sentence.

Page 22, 1st paragraph: Delete the words *based on TBC national dose* and change the word *standard* change to *guidance* and add *for all pathways*. Change *MTCA C* to *MTCA B*.

Page 24, 3rd paragraph, 1st sentence: Add Ecology after EPA.

Page 24, 3rd paragraph: Add the MCL standard for Sr-90.

Page 25, 2nd paragraph: Change *EPA standard* to *EPA guidance*.

Page 25, under "Source Waste" heading, et. al (e. g., page 27 and 28): Delete all references to ranger/industrial scenario.

Page 26, 2nd bullet: Delete.

Page 29, under the Institutional Controls heading: Delete the sentence, *The DOE would prohibit any activities that would interfere with the remedial activity without EPA and Ecology concurrence.*

Page 36, 1st sentence: Delete.

Page 38, Table: Update to reflect current information.

Page 38, under the "Compliance with Applicable or Relevant and Appropriate Requirement" heading: Revise the section to clarify it is for groundwater.

Page 41, under the heading "National Environmental Policy Act Evaluation": EPA requested deletion of this paragraph, as with the TSD ROD. Glenn Goldberg, RL, has the action to check into the need for a NEPA evaluation to be included in the ROD. Note: RL provided language to replace the current evaluation.

Page 41, under "Selected Remedy" heading: Insert a comma after CERCLA or change it to read remedial action after CERCLA.

Page 42: Change references to the *O&M Plan* to *SAP*.

Page 42, #2 (a): Change *inorganics and organics* to *chemicals*.

Page 42, #2 (a), last sentence: Add the words *whichever is more restrictive*.

Page 42, #2 (b): Flag for further discussion. EPA feels public review is needed if RAOs are not met.

Page 43, #9: Delete the sentence that begins, *DOE will prohibit activities...*

Page 44, 1st bullet: Insert a period after *Sr-90* and delete the remainder of the bullet.

Page 44, 3rd bullet: Clarify the 5-year period and change references to O&M Plans to SAPs.

Page 44, #1: Change references to O&M Plans to SAPs.

Page 45, #6: Delete *Columbia River Comprehensive Impact Assessment*.

Page 50, last two sentences under the heading "Cost Effectiveness": Delete the second *however*, and revise the sentence to begin, *It has been determined...*

Page 51, under the heading "Documentation of Significant Changes": Add Ecology.

Changes will be made to the RODs and hard copies will be sent to EPA (3) and Ecology (2).

Meeting was adjourned at 4:00 p.m.

ETC:cw