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

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Meeting Minutes Transmittal/Approval
300 Area Unit Managers' Meeting
Remedial Action and Waste Disposal Unit/Source Operable Unit
3350 George Washington Way, Richland, Washington
February 2002

APPROVAL: Robert G. McLeod Date 6-20-02
Robert G. McLeod, 300-FF- 1 & 300-FF-2 Area Unit Managers, RL (A3-04)

APPROVAL: Kevin Leary Date 6-20-02
Kevin Leary, 618-10 & 618-11 Area Unit Manager, RL (A6-38)

APPROVAL: R. Michael Thompson Date 7/30/02
Mike Thompson, 300-FF-5 Area Unit Manager, RL (A5-13)

APPROVAL: John B. Price Date 7-11-02
John B. Price, Cleanup Project Manager, WDOE (B5-18)

APPROVAL: Mike Goldstein Date 6/19/02
Mike L. Goldstein, 300 Aggregate Area Unit Manager, EPA (B5-01)

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

Attachment 1	--	Agenda
Attachment 2	--	Attendance Record
Attachment 3	--	300 Area Meeting Minutes – February 19, 2002
Attachment 4	--	Previous Open Action Items List
Attachment 5	--	Status Meeting – February 5, 2002

Prepared by: _____ Date 8/5/02
Jenifer Linville/ Michael Wetzler (H0-17)

Concurrence by: _____ Date 8/5/02
Vern Dronen, Project Manager
BHI Remedial Action and Waste Disposal Project (H0-17)

UNIT MANAGERS MEETING AGENDA

3350 GWW – 1B45
February 19, 2002, 1:30-3:30 p.m.

1:30 – 3:30 p.m. 300 Area

Administrative (1:30 – 2:00)
- Action Item List
- Next UMM is March 19, 2002, 1:30 – 3:30, 3350 GWW (1B45)

***Crossover Items** (These items will be discussed at next 100UMM)*
- *Site Wide Institutional Controls Plan*
- *TPA Milestone Negotiations (M-16-00B)*

300-FF-1 Remedial Action (2:00 – 2:30)
- 618-4 Procurement Status
- Staging, ERDF
- CVP Status
- Air Monitoring
- Drum Treatment Technologies
- Spill Reporting

300-FF-2 (2:30 – 3:00)
- 618-10 & 618-11 Engineering Study
- 618-11 Benchmarking
- Outside The Fence Design
- RDR/RAWP/SAP
- Kd/Leach Study

300-FF-5 (3:00 – 3:30)
- 300-FF-5 O&M Plan revision
- 300 Area Shoreline Study
- 300-FF-5 SAP Review

Meeting Minutes Schedule

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

Remedial Action and Waste Disposal Unit Managers' Meeting
Official Attendance Record – 300 Area
February 19, 2002

Please print clearly and use black ink

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
ANDREW ROGERS	300FF1 (BHI)	300FF 1	373 5445
Mike Goldstein	EPA	Unit Manager	376-4919
K. Michael Thompson	DOE-RL-GW/VZ	300FF-05	373-0750
Richard Carlson	300-FF-2 BHI	300-FF-2	372-9632
Bob McLeod	300 Area : DOE	300 UM	372-0096
Frank Corpuz	300FF1/2	BHI Proj Engineering	531-0625
Jane V Borghese	GW/VZ	300-FF-5	372 9447
Roger Ovink	~~[illegible]~~ CHI	300-FF-5	375-9426
John April	300 Area Remed.	FF-1/2	3-3008
Wayne Soper	Ecology	300 Area	736-3049
Larry Hulstrom	CHI	FF2/5	372-9602
Steven Clark	CHI	300 Area	372-9531
Alex [illegible]	BHI - CVP	CVP	375-9432
Ella Quenenberg	CHI	FF-2	372-9303
Scott Parnell	CHI	FF-2	372-9297
Jim Hanson	DOE-RL	Technology	372-4503
Bryan Foley	DOE-RL	6/8-10 & 11 BG	376-7087

MEETING MINUTES
REMEDIAL ACTION AND WASTE DISPOSAL
UNIT MANAGER'S - 300 AREA
3350 GWW-- Room 1B45 -- 1:30-3:30 p.m.
February 19, 2002

ADMINISTRATIVE

Review of Open Action Item List: (Attachment 4)

- There was no review of the Open Action Item List this month.

The next UMM is March 19, 2002, 1:30-3:30, 3350 GWW 1B45.

CROSSOVER ITEMS FROM 100 AREA UMM

- **Site Wide Institutional Controls Plan:** The comment period is March 18 through April 18. The 300 Area sign requirements will be placed in the 300-FF-2 RDR/RA work plan.

- **TPA Milestone Negotiations (M-16-00B):** A public meeting is scheduled for March 6, 2002. EPA is scheduled to do the presentation of scope and figures.

300-FF-1

- **618-4 Procurement Status:** The contract was awarded on Jan 23, 2002. A job hazards analysis was approved for road grading. Installation of trailers is scheduled for this week. Work is forecast to start March 27, 2002.

- **ERDF Staging Area:** There was a concern relative to the timing of the approval of the ROD amendment associated with the ERDF staging area. There were no issues with the concept of the staging area. However, the construction of the staging area can not commence until the ROD Amendment is signed. Drums from the 618-4 burial ground are scheduled to be shipped to the staging area starting the first or second week of April.

- **Air Monitoring:** The Plan was approved. Monitors will be up and running by the end of the week.

- **Drum Treatment Technologies:** The updated baseline report will be issued by the ERC Environmental Technologies Group in the near future.

- **Spill Reporting:** A discussion was held relative to spill reporting requirements for known waste streams such as the 618-4 Burial Ground depleted uranium waste. A prenotification approach for known waste streams was introduced for consideration. EPA expressed a concern that we should not be changing the process from that which

was acceptable in the past. Reporting should be done on a case-by-case basis. It was agreed that a "white paper" would be provided to RL and EPA to further present the proposed approach.

300-FF-2

- **618-10 and 618-11 Engineering Study:** The last task associated with this effort was completed on January 24, 2002.

- **618-11 Benchmarking:** At the April 14, 2002 benchmarking call Weston Robotics Creation offered their services. It was suggested that Fluor Hanford should be brought into the process for the next call, which is scheduled for April 17, 2002. Everyone sees this activity as worthwhile and worth continuing.

- **Outside the Fence Design:** The 30% design package was issued for internal review for waste sites to be remediated by 2012.

- **RDR/RAWP/SAP:** Comments from the regulators on Draft A of these documents is due on February 25. A status meeting was held on February 5. Mike Goldstein (EPA) suggested that the 300-FF-1 RDR be revised to discuss the changes to the 618-4 burial ground. ERC staff agreed to revisit this issue but felt that it would be more efficient to include this information in the 300-FF-2 RDR as presently written. The schedule for issuance of the documents was discussed relative to the need to have something in place to allow for 300-FF-1 remedial actions to continue. Rich Carlson provided EPA the draft minutes from the February 5, 2002, status meeting (attached).

- **Kd Leach Study:** The revised SAP was issued. The study is ongoing.

300-FF-5

- **300-FF-5 O&M Plan Revision:** Comments have been received. Work is ongoing with the goal of having the next draft complete by the end of March.

- **300 Area Shoreline Study:** Some results have been received. Preparation of a draft report is ongoing, while waiting for the remainder of the results.

- **300-FF-5 SAP Review:** Internal review was completed last week and comments are now being incorporated. The SAP can not to be completed until after the O&M Plan is done.

300 Area Unit Manager Meeting Action Items Log

Action #	Action Item	Assigned to	Comment	Date	Target Date	Action Taken	Date Completed	Status

Attachment 4

Last Revised on 02/19/02

Attachment 3

Environmental Restoration Contractor **ERC Team**

Meeting Minutes

096535
Job No. 22192
Written Response Required: NO
Due Date: N/A
Actionee: N/A
Closes CCN: N/A
OU: 300-FF-1, 300-FF-2
TSD: N/A
ERA: N/A
Subject Code: 4170, 8280

SUBJECT 300 AREA REMEDIAL ACTION PROGRESS MEETING

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FROM E. T. Coenenberg ETC

DATE April 1, 2002

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ATTENDEES
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W. W. Soper, Ecology, B5-18
R. A. Carlson, BHI, H0-17
R. E. Jaquish, WDOH
M. L. Goldstein, EPA, B5-02
L. C. Hulstrom, CHI, H9-03
R. G. McLeod, RL, H0-12
J. A. Lerch, CHI, L6-06

DISTRIBUTION
Attendees
J. G. April, BHI, L6-06
Document and Information Services H0-09

A meeting on the above subject was held on February 5, 2002, at 3350 George Washington Way, Room 1B45, to discuss and resolve various issues associated with elements of the 300 Area Remedial Action project. The meeting was attended by representatives from the U.S. Department of Energy, Richland Operations Office (RL), U.S. Environmental Protection Agency (EPA), the Washington State Department of Health (WDOH), the Washington State Department of Ecology (Ecology), and the Environmental Restoration Contractor (ERC) (Attachment 1).

The meeting began with introduction of the various issues and elements to be discussed (Attachment 2). Ecology and EPA stated that they wished to focus on discussion of the preliminary conceptual site model (CSM) for uranium presented in the draft uranium Kd/leachability white paper and its integration into the remedial design report/remedial action work plan (RDR/RAWP). The various issues and elements in their order of discussion were as follows:

- Schedule/milestones
- Integration of CSM
- RDR/RAWP
- Sampling and analysis plan (SAP)
- 300-FF-1 Closeout verification packages (CVPs)
- Kd/leachability white paper
- 300 Area unrestricted land use analysis.

Schedule/Milestones:

Comments on the RDR/RAWP and SAP from EPA, Ecology, and the tribes are due by February 27, 2002.

It was noted that the 300-FF-2 Record of Decision (ROD) stated that the RDR/RAWP was to be submitted to EPA by June 30, 2002. EPA and RL agreed that the intent of that submittal was to be a draft document and, therefore, that requirement had been meet. However, they agreed that an appropriate further goal was to submit a Revision 0 of the RDR/RAWP before June 30, 2002 to support closeout of the 618-4 Burial Ground and initiate excavation of the 618-5 Burial Ground.

Schedules associated with interim milestone M-016-03H were identified as being related to the RDR/RAWP and SAP. Interim milestone M-016-03H states the 618-4 Burial Ground excavation, verification (sampling/analysis/data validation), and regrading will be completed by December 31, 2003. The RDR/RAWP and SAP must be approved by EPA before verification sampling can occur in the 618-4 Burial Ground. Also, initiation of excavation of the 618-5 Burial Ground is tied to the approval of the RDR/RAWP and SAP. Excavation at 618-5 could be initiated as early as mid-summer. EPA, Ecology, and RL agreed that the activities planned for the current path forward and the process for completion of these documents appear unlikely to impact the interim milestone at this time.

Integration of Conceptual Site Model (CSM):

The generic conceptual site model presented in the 300-FF-2 ROD has also been used in the RDR/RAWP and SAP. It was noted that the draft uranium Kd/leachability white paper with a new preliminary CSM specifically for uranium should be incorporated in the RDR/RAWP and SAP when they are revised. Ecology and EPA commented that based on the preliminary data from the Kd/leachability study, it appears that the uranium CSM is practical and that the continuing laboratory studies conducted by Pacific Northwest National Laboratory will provide data to refine the uranium CSM. Further discussion identified that the cleanup values used in the ROD were based on the generic CSM and inclusion of the preliminary white paper CSM could cause confusion. Further discussion was tabled for later in the meeting.

RDR/RAWP:

Discussion focused on explaining the lookup values presented in the draft RDR/RAWP. As stated earlier, the 300-FF-2 ROD cleanup values were developed based on the generic CSM that identifies the residual soil profile to include a clean lower vadose zone. However, the RDR/RAWP provided lookup values (used as a field implementation tool) that approximated a "worst case" residual soil profile (i.e., all contaminants of concern are mobile and the residual soil profile is considered to have uniform contamination to groundwater). If the residual soil concentration levels are less than the lookup values, then the remedial action would be considered protective of all pathways and no additional work or soil profile information would be needed. Otherwise, waste site test pitting/boreholes or analogous site data would be required to establish residual contaminant concentration profiles in the lower vadose zone to support closeout and demonstrate compliance with the 300-FF-2 ROD cleanup values.

It was determined that the use of the lookup values was most applicable for liquid waste sites where plumes of liquids and contaminant migration occurred. The lookup values are less applicable for surface contamination areas, dump sites, and burial grounds where little residual contamination is anticipated after waste removal. Since most of waste sites identified in the RDR/RAWP are generally burial grounds, dump

sites, or surface contamination areas, the use of the lookup values would not be a primary field tool. Therefore, it was agreed to remove the lookup values from the RDR/RAWP and revise the text to identify use of analogous site data or test pitting/boreholes to establish residual soil contamination profiles to support closeout and demonstrate compliance with the 300-FF-2 ROD cleanup values. Criteria would be established and included in the RDR/RAWP to identify which sites would be expected to require test pitting/boreholes or analogous site data for cleanup verification. EPA wished to have it made clear that no waste site would be test pitted unless it was believed that groundwater protection was an issue.

Additionally, in response to informal comments from EPA during the ERC review of the RDR/RAWP, Section 1.2.1 and Section 3.5 were revised to address in more detail the selected remedy and Section 2.1.1 expanded the discussion of the remedial action objectives.

EPA requested that a general discussion and crosswalk between the RDR/RAWP and 300-FF-2 ROD be included in the document. EPA also requested that the Tri-Party Agreement milestones that have been recently negotiated be included in the schedule of the RDR/RAWP. It was suggested that a table be developed identifying the 300-FF-2 waste sites and the dates when the sites would be cleaned up. For the sites that did not have specific dates, it should be noted that those dates would be negotiated by the 2007, according the milestones.

With respect to the new CSM for uranium, RL and EPA agreed it would make sense to create a new appendix to the RDR/RAWP specifically for closeout of uranium after the completion of the Kd/leach study and CSM discussions and agreements. The RDR/RAWP would identify a placeholder for that appendix at this time. Section B6.2 would be revised to identify that it is applicable to all contaminants of concern except uranium.

Sampling and Analysis Plan (SAP):

The SAP was briefly discussed. Ecology commented that there is discussion within Ecology about the description of "compositing" closeout samples that is presented in the SAP. Ecology will continue to discuss the issue in-house and bring the results of their discussions to RL and EPA.

300-FF-1 Closeout Verification Packages (CVPs):

Project files are being developed to compile all the relevant information/data for completion of the 300-FF-1 CVPs. This information will be retained electronically and in hardcopy form until the uranium Kd/leachability study is complete and the issue of uranium transport and groundwater protection is resolved to allow CVPs to be completed. As part of the path forward, RESRAD modeling will be performed using preliminary conclusions of the uranium Kd/leachability study to determine if it can be demonstrated that residual uranium concentrations are protective of groundwater at the South Process Pond.

Kd/Leachability White Paper:

Discussion focused on the path forward for the white paper and the uranium CSM. It was agreed that at this time the data supporting the white paper are preliminary and that the ongoing Kd/leach studies will refine the data. EPA stated that one of their major comments on the RDR/RAWP would be that Section B6.2 will be rewritten to include a discussion of how remedial action goals apply to the CVP process. A figure showing the generic conceptual site model used in the 300-FF-2 FFS should be included

to show how all contaminates other than uranium are considered in the CVP process. The figure from the draft uranium Kd/leachability white paper explaining the uranium CSM should be included to show how the uranium CSM applies to groundwater protection.

300 Area Unrestricted Land Use Analysis:

This topic was not discussed, but was tabled for the February Unit Managers Meeting, scheduled for February 19, 2002.

Review Schedule:

Ecology agreed to coordinate submitting their comments to EPA. EPA agreed to formally submit their comments, so as to document them in the Administrative Record. Responses to the comments will be provided in a comment-response package and, if necessary, a redline-strikeout version will be prepared. RL stated that comments are expected from the tribes and will be shared with EPA.

Action Items:

- RDR/RAWP Changes:
  - Remove the lookup tables, and revise the text to identify use of analogous site data or test pitting/boreholes to support closeout. Include the criteria to be used and determine which sites would be expected to use analogous data or test pitting/boreholes.
  - Include the Tri-Party Agreement milestones that have been recently negotiated.
  - Develop a table identifying the 300-FF-2 waste sites and expected dates for cleanup to be complete.
  - Revise Appendix B to reflect use for all contaminants of concern except uranium. Make a place-holder appendix for the outcome of the current Kd/leach study and CSM work, and make revisions to Section 2.
  - Include the figure from the draft uranium Kd/leachability white paper explaining the uranium CSM and include a discussion of how uranium behaves in the environment. Refer to the new appendix that will provide the details once the Kd/leach study is complete.

- Ecology will resolve the "compositing" issue in-house and inform EPA of the results.

- SAP Changes: Revise text to incorporate test pitting and use of analogous sites.

ETC:pek

Attachments: 1. Attendance Roster
2. 300 Area Remedial Action Overview

Attachment 1

Attendance Roster

CH2MHILL

SUBJECT: 300 Area RDR/SAP Attendees

BY: 8-11 am

SHEET NO. ____ of ____ DATE: 2/5/02

PROJECT NO. 1845

Name	Affiliation	Phone
Steve Clark	CHI	372-9531
Ella Coverdale	CHI	372-9303
Wayne Soper	Ecology	736-3049
Richard Carlson	BHI	372-9632
Richard E. Jaquish	WDOH	628-2804
Mike Goldstein	EPA	376-4919
Larry Hulstrom	CHI	372-9682
Bob McLeod	DOE	372-0096
Jeff Lerch	CHI	373-5904

Attachment 2

300 Area Remedial Action Overview

300 Area Remedial Action Overview

February 5, 2002

Introduction

Discussion Topics

- RDR/RAWP and SAP
  - -- Schedule and milestones
  - -- Integration of conceptual site model
- RDR/RAWP
  - -- Lookup values
  - -- Selected remedy
  - -- Remedial action objectives
- SAP
  - -- Overview and general site closeout approach
- 300-FF-1 CVPs
- Kd/leach study and white paper
- 300 Area Unrestricted Land Use Analysis

RDR/RAWP and SAP

Schedule/Milestones

- February 27, 2002 - comments due from EPA
- June 30, 2002 - RDR/RAWP to be submitted to EPA
- Late FY 2002 - 618-4 Burial Ground closeout sampling and 618-5 Burial Ground excavation
- December 31, 2003 - complete all 300-FF-1 waste sites

Ruth

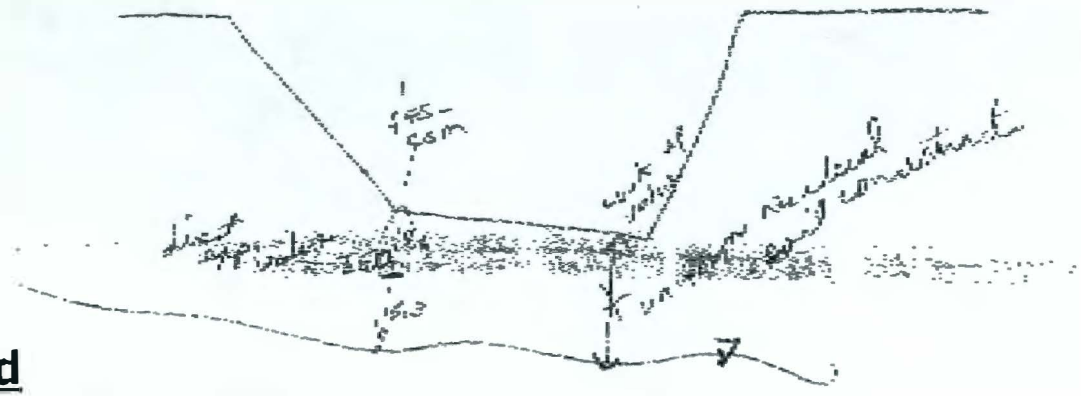
RDR/RAWP and SAP

CSM

Conceptual Site Model Integration

- Conceptual Site Model elements are integrated into RDR and SAP documents
- Need to issue RDR and SAP based on current CSM and de-couple from Kd/leach study developments and anticipated future modifications to meet schedule and milestones
- RDR and SAP are documents that can be revised at any time to address any future modifications to CSM that result from Kd/leach study

RDR/RAWP



Lookup Values - Background

- ROD cleanup levels developed based on generic site profile (residual soil profile includes clean lower vadose zone)
- Lookup values approximate a "worst case" residual soil profile (e.g., all COCs mobile, uniform contamination to groundwater) for comparison with ROD cleanup levels developed based on generic residual soil profile
- Lookup values used as field tool for cleanup of 100 Area waste sites

  If - residual soil concentration levels less than lookup values

  Then - cleanup protective of all pathways and closeout supported with no additional work or soil profile information

  Otherwise - test pit/borehole or use of analogous site data required to establish residual soil profile to support closeout

RDR/RAWP(continued)

Lookup Values - Current Status

- Applicability to 300-FF-2 sites revisited
  - -- Use of lookup values viewed to be most applicable for liquid waste sites where plumes and migration occur with liquid driver
  - -- Lookup values less applicable for surface contamination areas, dump sites, and burial grounds where little residual contamination is anticipated after waste removal

RDR/RAWP(continued)

Lookup Values - Proposed Path Forward

- Remove lookup values text and tables from Section 2.0
- Retain ROD cleanup values
- Add text to identify use of analogous site data or excavation of test pit/borehole during remedial action operations at 300-FF-2 sites to establish residual soil profile
  - -- Data type to be proposed by project based on type of site and/or field observations (e.g., type and amount of waste unearthed during remedial action) with concurrence from RL and EPA
  - -- If test pit/borehole: 1 per site at "worst case" location to be proposed by project with concurrence from RL and EPA, excavate to high water mark with sampling at 1 m intervals

RDR/RAWP(continued)

Lookup Values - Path Forward Benefits

- Consistent with 100 Area where test pits/boreholes are used
- Data collected to establish site-specific residual soil profile
- Provides information to answer question on sources of groundwater contamination

Additional discussions on development of lookup values can be held if desired.

RDR/RAWP(continued)

Selected Remedy

- Each of the components of the selected remedy from the ROD are listed in Section 1.2.1.
- Further discussion of each of these components is provided in Section 3.5 of RDR/RAWP.

RDR/RAWP(continued)

Remedial Action Objectives (RAOs)

- Section 2.1.1 discussion of RAOs has been expanded to include additional text describing how RAOs are to be achieved.

SAP

Overview

- Developed based on 100/300 Area DQO report
- Two primary sample designs presented
  - Waste characterization
  - Site closeout
- 100 Area SAP verification sampling design (liquid sites) to be implemented for closeout of 316-4 Crib (DOE/RL-96-22) using 300-FF-2 cleanup levels
- Proposed approach for use of test pits to establish site specific residual soil profile would be integrated into site closeout sampling design

SAP

General Site Closeout Approach

- Closeout approach proposed by project near completion of excavation operations based on type of site and/or field observations (e.g., type and amount of waste unearthed during remedial action)
  - -- Residual soil profile data collection (analogous site data or test pit/borehole including recommended location and COCs)
  - -- Biased sample locations and COCs
  - -- Statistical verification sample COCs
- RL and EPA concurrence with approach documented through UMM minutes or other mechanism

300-FF-1 CVP Status

- Development of project files (attached table)

300-FF-1 Cleanup Verification Package Project File

Project File Element	Electronic File	Hardcopy
Landfill 1A		
Cleanup Verification Package for the 300-FF-1 Operable Unit, Landfill 1A (project draft)(CVP-2000-00020, August 2000)		
Cleanup Verification Package for Landfill 1A (WIDS Site 300-49) (CVP team draft)(CVP-2000-00020, August 2001)		
Comments/Markup (CVP team draft – Goldstein, McLeod, Carlson)		
RESRAD Calc Brief (0300F-CA-V0013)		
95% UCL Calc Brief (0300F-CA-V0011)		
Landfill 1B		
Cleanup Verification Package for the 300-FF-1 Operable Unit, Landfill 1B (project draft)(CVP-2000-00021, September 2000)		
Pre- and Post-Excavation Topography Maps		
Verification Sample Results Summary		
95% UCL Calc Brief ()		
Landfill 1D		
Remediation Process Summary		
Pre- and Post-Excavation Topography Maps		
Verification Sample Results Summary		
95% UCL Calc Brief ()		
South Process Pond		
Remediation Process Summary		
Pre- and Post-Excavation Topography Maps		
Verification Sample Results Summary		
95% UCL Calc Brief ()		
618-4 Burial Ground		
618-4 Burial Ground Excavation Report (BHI-01200, Rev 1)		
Pre-Excavation Topography Map		

Remediation Process Summary to include excavation begin/end dates, design and actual excavation quantities, text description of operations, anomalous waste summary (Landfill 1D), and post excavation LARADS survey.

300 Area Kd/Leach Study and White Paper

- White paper path forward integrated into the 300-FF-5 O&M plan
- Need to determine best course of action between now and December 2002
- Decouple from issuance of RDR/RAWP and SAP documents

300 Area Unrestricted Land Use Analysis

- Working to establish scope and estimate associated resources necessary to complete analysis
- schedule drivers (HAB, RL information)