MEETING NOTES
Waste Management Area A-AX: Boundary Discussion

MEETING DATE: November 3, 2020
LOCATION: Microsoft Teams Meeting
ATTENDEES:

Mike Barnes (Ecology)	Jeff Lyon (Ecology)	Kim Schuyler (Freestone)
Becky Blackwell (DOE-ORP)	Nina Menard (Ecology)	Cindy Tabor (WRPS)
Doug Hildebrand (DOE-RL)	Danny Parker (WRPS)	Kim Welsch (Ecology)
Rod Lobos (DOE-ORP)	Julie Robertson (Freestone)	

BACKGROUND INFORMATION: Between January and August 2017, representatives of the Washington State Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), the U.S. Department of Energy Office of River Protection (DOE-ORP), the U.S. Department of Energy Richland Operations Office (DOE-RL), Washington River Protection Solutions (WRPS), and CH2MHILL Plateau Remediation Contractor (CHPRC) participated in a series of meetings to develop data quality objectives (DQOs) for Waste Management Area (WMA) A-AX vadose zone soil. The results of those meetings are documented in *Data Quality Objectives for Vadose Zone Characterization at Waste Management Area A-AX* (RPP-RPT-60227, Rev. 0; henceforth called the DQO Report). Since that time, WRPS, DOE-ORP, and Ecology have continued working together to define additional DQOs and data needs for WMA A-AX, as documented in meeting notes and revisions to the DQO Report.

1.0 PURPOSE OF MEETING

Cindy Tabor opened the meeting by describing the meeting purpose to be for DOE to obtain clarification about Ecology suggestions that the boundary of the WMA A-AX soil investigation be expanded to include the 244-AR Vault, Tank 241-AY-102, and a portion of waste site 200-E-131 that lies east of the A Farms fenceline (the "polygon").

2.0 BACKGROUND

During WMA A-AX boundary discussions held in September 2020, Ecology requested that DOE expand the WMA A-AX soil investigation to include three locations that lie outside the fencelines of A Farm and AX Farm. Ms. Tabor said that there are a lot of steps and processes involved and that it is important for the attendees to understand the expectations clearly.

3.0 BOUNDARY DISCUSSION

Julie Robertson shared a graphic illustrating the various locations under discussion (Attachment 1). She pointed out the locations of the 244-AR Vault, Tank 241-AY-102, and the 200-E-131 polygon relative to A Farms. Ms. Robertson also noted that regardless of the outcome of the discussion about the polygon, corrections to Waste Information Data System (WIDS) information about 200-E-131 will be needed, because the written description of the waste site conflicts with the mapped area identified as 200-E-131; the written description states that AN Farm soils are part of the waste site, while the mapped area excludes AN Farm. Ms. Robertson also pointed out that the graphic shows only the subset of pipelines in the area that cross the A Farm and AX Farm fenceline, noting that there are many more pipelines in the illustrated area than are shown in Attachment 1.

Ms. Robertson repeated Ms. Tabor's statement that the goal of the meeting is to get clarification from Ecology about their request to add the three locations outside the A-AX Farms fenceline to the WMA A-AX soil investigation, as well as an understanding of the processes Ecology envisions being used to conduct the investigation, report and evaluate the resulting data, and develop cleanup recommendations for the locations if needed.

244-AR Vault and 241-AR-151 Diversion Box

Ms. Robertson shared the information in Attachment 2 and began reviewing the background information regarding the 244-AR Vault. Ms. Robertson stated that the Hanford Facility RCRA Permit Single Shell Tank (SST) Unit Group Part A (both the signed version and the draft Rev. 9 version) associates numerous tanks with WMA A-AX, but that only the four tanks in the 244-AR Vault are outside the A Farm/AX Farm fencelines. She stated that the vault was initially incorporated into the Double Shell Tank (DST) portion of the RCRA Permit, but that in 1996 a rationale was developed to transfer the vault to the SST Unit Group. Nina Menard stated her belief that the 244-AR Vault is still listed on the Part A for the DST Unit Group. **ACTION 2020-11-03-01: Ms. Tabor took an action to review the Part As to verify which lists the 244-AR Vault.**

Ms. Robertson stated that the 244-AR Vault was added to the 200-IS-1 Operable Unit (OU) in 2013 [*Hanford Federal Facility Agreement and Consent Order* (TPA) Change Control Form C-13-01] with a double-asterisk footnote in TPA Action Plan Appendix C, indicating that RCRA closure of the vault was to be coordinated with 200-IS-1 OU activities investigation, risk assessment, and remedy evaluation activities. In keeping with this agreement as well as Milestones M-037-24/M-037-25, DOE incorporated the 244-AR Vault into the 200-IS-1 OU scoping report and draft work plan. Ms. Menard asked whether the vault was specifically called out for coordinated closure in the binning table that supported negotiation of the M-037 milestones, and Ms. Robertson said that no specific components were identified in the binning table. Ms. Menard stated that when these agreements were reached, Ecology's intent was to incorporate pipelines, valve boxes, and small miscellaneous tanks into 200-IS-1 OU, but not large structures like the 244-AR Vault.

Ms. Robertson reviewed some of the questions from Attachment 2 related to the 244-AR Vault, seeking to clarify the following:

- Ecology's rationale for adding the vault and diversion box to the WMA A-AX PA and RFI
- Whether Ecology was requesting including just the soil around the vault in the WMA A-AX investigation, or the building and tanks as well
- Whether Ecology was requesting adding the vault to the WMA A-AX remedy evaluation process in addition to the WMA A-AX investigation and risk analysis
- Whether Ecology was requesting that the vault be removed from the 200-IS-1 OU investigation, risk assessment, and remedy evaluation process (and whether Ecology believes the vault should not be addressed by a coordinated closure process).
- Whether Ecology's concerns were related to the planned schedule for investigating WMA A-AX vs. 200-IS-1 OU.

Regarding the investigation schedule, Ms. Menard objected to the implication in the written questions that 200-IS-1 OU work was deprioritized due solely to Ecology inability to support 200-IS-1 OU, 200-EA-1 OU, and other work at the same time. She stated that Ecology and DOE both had staff resource concerns and had jointly agreed to delay investigating 200-IS-1 OU until after 200-EA-1 OU. Doug Hildebrand agreed with her statement.

Kim Welsch asked what data were used to determine that the 244-AR Vault had not leaked. Ms. Tabor said that the conclusion that the vault had not leaked was based on information in the Leak Assessment report, and that a review of occurrence reports indicated there were no leaks. **ACTION 2020-11-03-02: Ms. Tabor will provide leak assessment report number**. Ms. Menard stated that if there is no comingling of waste leaked from the vault with waste from other sources, then the vault is not a candidate for coordinated closure and should be closed under RCRA alone. She said that any unit that has the double-asterisk footnote is a treatment/storage/disposal (TSD) unit subject to RCRA. Ms. Robertson agreed that waste sites with the double-asterisk footnote are TSD units that must undergo RCRA closure, and Mr. Hildebrand agreed that a closure plan would need to be written. Ms. Menard acknowledged that there are other RCRA units at Hanford (e.g., the Hexone Tanks in the 200 West Area as well as several soil disposal sites) that are being addressed through the coordinated closure process. However, Ms. Menard reiterated that the size of the 244-AR Vault was a concern and that Ecology would need to discuss the matter further because the vault is unusual compared to other locations being addressed under coordinated closure.

The attendees briefly discussed the WMA A-AX risk assessment effort as it relates to the DOE O 435.1 Performance Assessment (the "PA") and the TPA Action Plan Appendix I Performance Assessment (the "IPA"). There was general agreement that it is difficult to understand how to apply RCRA, CERCLA, and DOE PA requirements and processes. **ACTION 2020-11-03-03: Ms. Menard and Mr. Welsch will meet with Ecology staff to learn more about the PA and IPA efforts and how those might relate to the 244-AR Vault. Based on these discussions, Ms. Menard will work with her staff to identify where the 244-AR Vault soil characterization should be addressed (i.e., 200-IS-1 or WMA A-AX).**

Jeff Lyon questioned why the 244-AR Vault would have been included on the DST portion of the Hanford Facility RCRA Permit, saying that the vault was more involved with the SST system than the DST system. Ms. Tabor and Mr. Hildebrand briefly described some of the history, and Ms. Robertson noted that the vault was last used to support DST operations. Ms. Tabor said that additional background information on the 244-AR Vault was provided in September 2020 communications.

<u>241-AY-102 (AY-102)</u>

Ms. Robertson referred to Attachment 2, reviewed the AY-102 background information, and briefly touched on several of the AY-102 questions. She stated that the goal was to get clarification about what Ecology would like to see included in the WMA A-AX soil investigation (soil vs. soil plus tank), and how DST AY-102 might fit into the WMA A-AX TPA Action Plan Appendix I SST closure process.

Mr. Lyon stated his belief that the soil around AY-102 should be investigated in the near-term because it is adjacent to WMA A-AX, and the information will be needed if closure of WMA A-AX calls for construction of a large barrier. Mr. Lyon's expectation is that AY-102 did not leak and that the investigation will demonstrate that the soil is "clean," which will support clean closure of the DST system. Ms. Robertson asked what the benefit is to sampling the soil at AY-102 now, when DST closure actions, including verification sampling, are scheduled years out (Question 6). Mr. Hildebrand stated that it is difficult to say today exactly what steps will be taken to close the DST system, but when closure occurs, if there is an upset in that group, soil assessment might have to be redone.

Ms. Tabor asked that the attendees address each AY-102 question in order.

- Questions 1 and 2: Mr. Lyon stated a desire to address just the soil around AY-102 – excluding the AY-102 tank – as a part of the WMA A-AX soil investigation. He stated that if contamination were found, evaluation of corrective action would not need to be included in the WMA A-AX (SST system) process/documents. Ms. Tabor asked Mr. Lyon if he was saying that DOE should sample the soil around AY-102 as a part of the WMA A-AX investigation, but not evaluate the results with WMA A-AX, and he responded affirmatively. He suggested that DOE could call AY-102 a WMA A-AX "focus area." Ms. Tabor stated that the only reason DOE was investigating WMA A-AX using focus areas was that the agencies had been unable to define the WMA A-AX boundary.
- Question 3: Mr. Lyon said Ecology is not proposing to apply TPA Action Plan Appendix I to AY-102.
- Question 4: Mr. Lyon said Ecology is not asking to move AY-102 to the SST portion of the Hanford Facility RCRA Permit.
- Question 5: Mr. Lyon stated that DOE has not proposed landfill closure of any DST. The DST closure plan calls for clean closure.
- Question 6: Adding to the earlier discussion about the benefit of sampling now, Mr. Lyon said that there would be efficiencies to using the current, rigorous investigation process and to simply relocating sampling equipment that is already working close by – rather than starting all over again at some time in the future. Additionally, Mr. Lyon said that if WMA A-AX is closed with an interim barrier, samples from the area around AY-102 would inform the decision for WMA A-AX. Mr. Lyon noted that DOE had transmitted a letter requesting an extension to the 180-day requirement for closing AY-102, to which Ecology has not yet responded, and sampling the soil around AY-102 and demonstrating that it is clean could help that process.
- Question 7: Mr. Lyon said that AY-102 is not going to be used in the future, and WMA A-AX has already developed a rigorous characterization approach. Why would DOE want to create a second set of documents? Mr. Lyon said there are benefits to sampling at AY-102 in the near term, as he had already stated. Rod Lobos asked Mr. Lyon whether Ecology wants AY-102 soils investigated because the tank is an unfit DST, and he asked Mr. Lyon to confirm that Ecology is not asking that the information be included in the WMA A-AX corrective action evaluation/documentation.
- Question 8: Ms. Tabor said that the WMA A-AX DQO report is written to reflect TPA Action Plan Appendix I requirements, and research was done to determine the constituents to best analyze for SST A and AX Farms. Expanding the WMA A-AX DQO process to address AY-102 soils would require a time-consuming re-evaluation of constituents, numbers of samples, and other details. She said that the DST DQO will be different and will have other data needs. Mr. Lyon did not feel the differences would be significant but agreed that the DST would need its own sampling and analysis plan. Ms. Tabor indicated that the additional effort will impact milestone dates.

Ms. Tabor summarized part of the discussion by saying that Ecology would like to see the soils around AY-102 (and not the tank itself) incorporated into the WMA A-AX soil investigation. Mr. Lobos emphasized the importance of identifying a WMA A-AX boundary that can be logically defined and defended. He added that Brian Hawkins would need to be involved in any decision to conduct near-term sampling at AY-102. **Action 2020-11-03-04: DOE will evaluate conducting near-term soil sampling at AY-102 concurrent with WMA A-AX soil characterization**. Ms. Tabor asked whether Mr. Lyon agreed that AY-102 does not need to be included in WMA A-AX, and whether the path forward is for DOE and Ecology to work together to prioritize the AY-102 soil investigation separate from WMA A-AX. Mr. Lyon confirmed that the WMA A-AX boundary does not need to incorporate the area

around AY-102, but that he was unwilling to separate the AY-102 soil investigation from the WMA A-AX soil investigation at this time. He stated that he was trying to gain efficiencies.

200-E-131 Polygon

The attendees did not have time to discuss this topic during the meeting.

4.0 ACTIONS AND AGREEMENTS

No new agreements were reached. Previously identified actions were not discussed. Three new actions were taken and are included in Table 1.

Ms. Robertson stated that she had reviewed both the signed DST system Part A and the draft Rev. 9 DST system Part A while the meeting was in progress, and that the 244-AR Vault is not on either.

Ms. Tabor asked Mr. Lyon about whether he'd had a chance to sign the meeting notes from the September 1, 2020, and September 16, 2020, WMA A-AX meetings. Mr. Lyon said that he would look at them before the end of the day. To ease the search, Ms. Tabor stated the notes had been sent to him for signature on October 14, 2020.

Table 1. Actions (3 pages)

Action Number	Actionee	Description	9/29/2020 Status
2017-03-30-03	Lyon/Lobos	Ecology and DOE-ORP will identify whether there are other potential WMA A/AX focus areas of interest and their level of interest in other focus areas relative to the Tanks A-104/105 focus area. 8/31/17: Ecology identified the areas near Tanks A-103, AX-102, and AX-104 as being of interest. Retain as open item for draft DQO summary report.	**Close**. Action to be combined into 2017-04-13-02.
2017-04-13-02	Lobos/Lyon	Discuss how DQO Step 4, define the boundaries of the study, will be addressed for the whole of WMA A-AX.	**Open**. DOE proposes to segment 200-E-131 and limit the WMA A-AX RFI/CMS scope to locations inside the fenceline and the soil around the 241-A-302B Catch Tank.
2017-08-07-09	Lobos/ Hildebrand	To support Action 2017-04-13-02, DOE representatives will meet to discuss how to address areas outside the WMA A-AX fenceline that are not yet identified in the 200-IS-1 Operable Unit.	**Close**. DOE representatives have met to discuss areas outside the fenceline and outside the 200-IS-1 operable unit. Action to be combined into 2017-04-13-02.

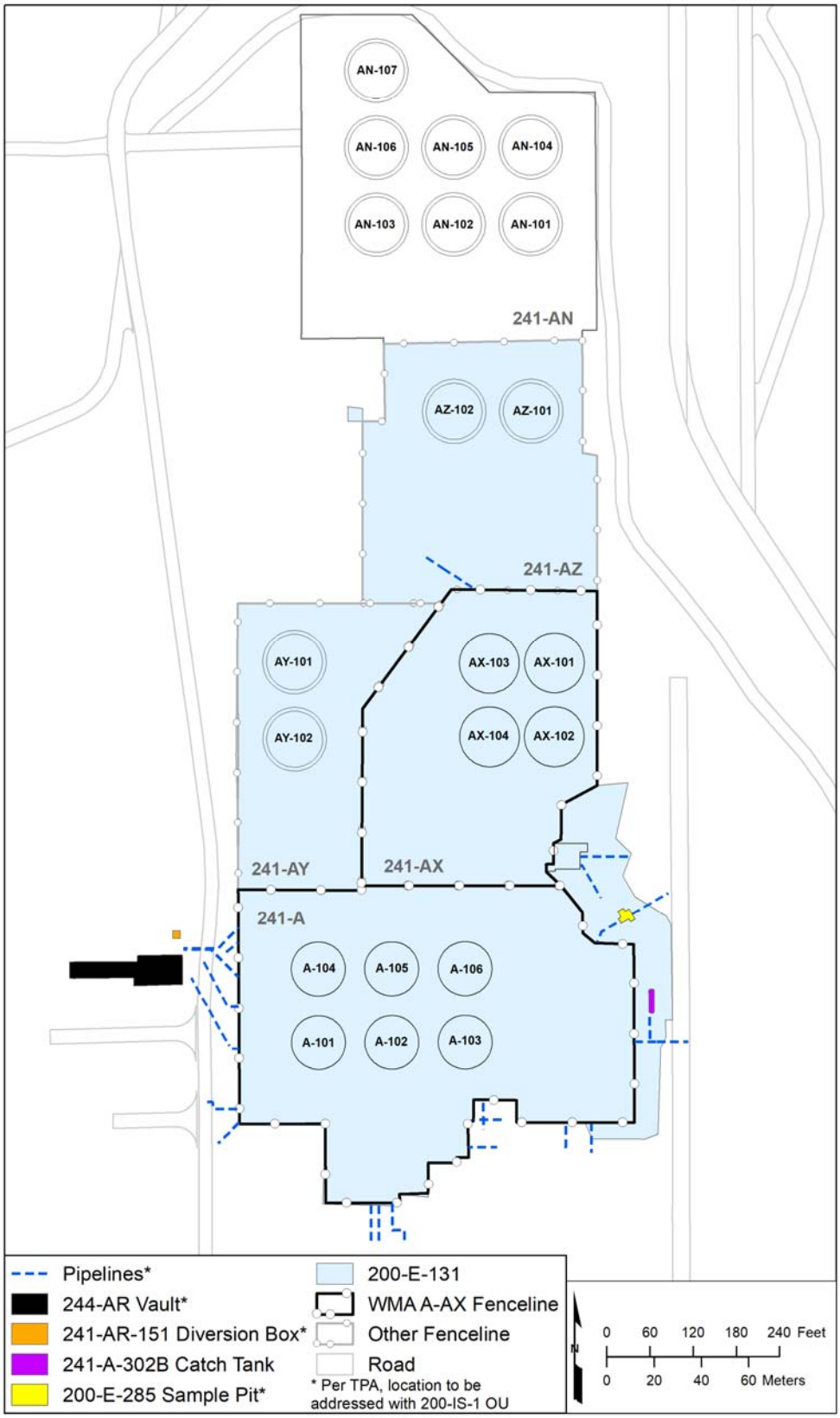
Table 1. Actions (3 pages)			
Action Number	**Actionee**	**Description**	**9/29/2020 Status**
2017-08-31-08	Lobos/ Hildebrand/ Lyon	Ecology, DOE-ORP, and WRPS will continue discussions about WMA A-AX Decision Rule and Performance Criteria text on data evaluation (e.g., use of 95% UCL).	**Open.** Refer to Section 6.2 in DQO Report Rev. 1, which states: "Use of acceptable levels will be documented during the development of the WMA A-AX RFI/CMS Phase 2 Work Plan. Additionally, cumulative risk calculations will be documented during the development of the WMA A-AX RFI/CMS Phase 2 Work Plan."
2019-03-05-01	Tabor	Provide a comparison of the analytical moisture measurements and the geophysical logging results.	**Open.** Applies to Focus Area 1. Still waiting on final laboratory reports.
2019-03-05-03	Tabor	Provide Ecology with final laboratory report when it is released.	**Open.** Applies to Focus Area 1. Still waiting on final laboratory reports.
2019-03-05-05	Hildebrand	Report back on RL discussions about management of pipelines just outside tank farm fencelines as a part of 200-IS-1 OU.	**Close**. Investigation of pipelines outside the WMA A-AX soil investigation boundary will be addressed by an operable unit. Action to be combined into 2017-04-13-02.
2020-09-01-01	Tabor	Send the following information to ECY (Lyon, Menard, Welsch): • Information about 244-AR Vault • 200-E-131 information shown at meeting • Snip from HMAPS showing southeastern boundary of WMA A-AX and waste sites/structures crossing the purple segment of 200-E-131.	**Close.** Information provided by Email from Cindy Tabor on 9/3/2020.
2020-09-01-02	Lyon, Menard, Welsch	Following receipt of information identified in Action 2020-09-01-01, discuss internally the following items to prepare for a follow-on meeting with DOE about the boundary to be addressed in the WMA A-AX soil RFI: • Segmentation of waste site 200-E-131 • Exclusion of 2607-ED septic tile field from WMA A-AX investigation • Closure of 244-AR Vault • WMA A-AX RFI soil investigation boundary definition.	**Close.** Internal Ecology meeting held to support 9/16/2020 meeting between DOE and Ecology.
2020-09-01-03	Tabor	Schedule follow-on meeting between DOE and ECY to discuss the boundary to be addressed in Step 4 of the WMA A-AX soil DQO.	**Close.** A follow-on meeting was scheduled for 9/16/2020.
2020-09-01-04	Lobos/Lyon	Address CMS scope/definitions.	**Open.**

Table 1. Actions (3 pages)			
Action Number	**Actionee**	**Description**	**9/29/2020 Status**
2020-11-03-01	Tabor	Ms. Tabor took an action to review the Part As to verify which lists the 244-AR Vault	**New.** During the meeting, Ms. Robertson reviewed the DST Part A and confirmed 244-AR Vault is not listed as part of the DST system. It is listed on the draft SST system Part A.
2020-11-03-02	Tabor	Ms. Tabor will provide leak assessment report number.	**New.**
2020-11-03-03	Menard/Welsch	Ms. Menard and Mr. Welsch will meet with Ecology staff to learn more about the PA and IPA efforts and how those might relate to the 244-AR Vault. Based on these discussions, Ms. Menard will work with her staff to identify where the 244-AR Vault soil characterization should be addressed (i.e., 200-IS-1 or WMA A-AX).	**New.**
2020-11-03-04	Rod Lobos	DOE will evaluate conducting near-term soil sampling at AY-102 concurrent with WMA A-AX soil characterization.	**New.**

Rod Lobos	Rodrigo Lobos	12/15/2020
DOE Project Manager (print)	DOE Project Manager (signature)	Date
Jeff Lyon	Digitally signed by Lyon, Jeffery (ECY) Date: 2020.12.24 17:26:53 -08'00'	12/24/2020
Ecology Project Manager (print)	Ecology Project Manager (signature)	Date

Attachment 1

Figure Showing WMA A-AX and Surrounding Area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A-103
Pipelines*
244-AR Vault*
241-AR-151 Diversion Box*
241-A-302B Catch Tank
200-E-285 Sample Pit*
200-E-131
WMA A-AX Fenceline
Other Fenceline
Road
* Per TPA, location to be addressed with 200-IS-1 OU
N
0 60 120 180 240 Feet
0 20 40 60 Meters

Attachment 2

Clarifying the Scope of the WMA A-AX Soil RFI/CMS
(4 pages)

Clarifying the Scope of the WMA A-AX Soil RFI/CMS

244-AR Vault and 241-AR-151 Diversion Box

Background Information

- Draft Rev. 9 RCRA Permit Part A for the SST System associates the following DWMUs (tanks) with WMA A-AX:
  - Six A Farm SSTs (inside the fenceline)
  - Four AX Farm SSTs (inside the fenceline)
  - 241-A-350 (inside the fenceline)
  - 241-A-417 (inside the fenceline)
  - 241-AX-152 CT (inside the fenceline)
  - Four 244-AR Vault tanks (outside the fenceline).

- The 244-AR Vault was constructed in the late 1960s and was initially used to support the SST system. In the mid-1980s the vault was upgraded for more general use as a waste transfer facility. Beginning in 1992 the vault supported the DST system. By 1996 the vault was reportedly no longer being used to support waste transfers. The vault was initially incorporated into the DST portion of the Hanford Facility RCRA Permit (as reflected in TPA Appendix B), but in 1996 a rationale was developed to transfer the vault to the SST system portion of the permit (12/13/1996 LMHC Letter 9655686). The vault was interim stabilized in 2001-2003.

- TPA CCF C-13-01 (in 2013) added the 244-AR Vault to the 200-IS-1 OU with a double asterisk footnote (TSD "units, and associated structures and equipment, for which RCRA closure and permitting activities are to be coordinated with past practice investigation and remediation activities").

- The agency-negotiated coordinated closure binning table identified that inactive SST components outside the WMAs would be subject to clean closure, landfill closure, or coordinated closure with the OU. The components subject to this agreement are defined as "pipelines, miscellaneous tanks, diversion boxes, or a combination of all three."

- TPA CCF M-37-19-01 (July 2019) allows for coordinated closure of inactive SST components outside the WMAs in accordance with TPA Action Plan Section 5.5 (M-037-24 and M-037-25).

- DOE is moving forward with evaluation of soils inside the 241-A and 241-AX Tank Farm fencelines as defined in the Hanford Facility RCRA Permit (plus soils around the nearby 241-A-302B Catch Tank) using the WMA A-AX soil corrective action process (WMA A-AX soil investigation, risk analysis, RFI report, and CMS) in accordance with TPA Action Plan Appendix I.

- DOE has incorporated the soils around the 244-AR Vault into the 200-IS-1 OU scope in accordance with TPA Appendix C and Milestones M-037-24/M-037-25. However, 200-IS-1 OU activities have been deprioritized to accommodate Ecology staff availability.

- Based on the available information, the 244-AR Vault and 241-AR-151 Diversion Box have not leaked.

- The 9/16/2020 Ecology email stated "both the 244-AR Vault and 241-AR-151 Diversion Box need to be analyzed for risk to support" the PA and RFI analysis.

Questions

1. What is the rationale for Ecology's request that both the vault and diversion box be analyzed for risk to support the WMA A-AX PA and RFI analysis?

2. TPA CCF C-13-01 (in 2013) added the 244-AR Vault to the 200-IS-1 OU coordinated closure process (200-IS-1 work plan, investigation, RI/RFI/FS/CMS) with a double asterisk footnote. Is Ecology proposing to remove the investigation of soils around the vault and diversion box from the 200-IS-1 OU coordinated closure process and into the WMA A-AX corrective action process (WMA A-AX work plan, soil investigation, risk analysis, RFI report, and CMS)? If so, what is Ecology's rationale?

3. Is Ecology asking that both the equipment and soils associated with the vault and diversion box be included in the WMA A-AX risk assessment (or just the soils)? If so, what is Ecology's rationale?

4. Conversely, is Ecology proposing to remove the investigation of soils around the WMA A-AX tanks from the WMA A-AX corrective action process and into the 200-IS-1 OU RI/RFI/FS/CMS? If so, what is Ecology's rationale?

5. Is Ecology identifying that the vault and diversion box cannot be closed using the coordinated closure approach allowed through TPA Appendix C and Milestones M-037-24/M-037-25? If so, what is Ecology's rationale?

6. Is Ecology's request that the AR Vault be included in the WMA A-AX investigation driven by a concern about the overall schedule for conducting actions in and near WMA A-AX (given the current status of 200-IS-1 OU activities)?

7. If DOE reprioritizes activities for the AR Vault, does Ecology's Tank Systems Operation and Closure group have the resources to support Ecology's Central Plateau CERCLA/RCRA OU staff?

8. Incorporation of soils around the vault and diversion box into the WMA A-AX soil investigation will impact the WMA A-AX schedule and milestones. Is Ecology willing to accept WMA A-AX schedule/milestone impacts?

<u>241-AY-102 (AY-102)</u>

Background Information

- During a September 16, 2020 meeting, Ecology stated that DOE should incorporate sampling of 241-AY Tank Farm, from just north of AY-102, south to the 241-A Tank Farm fenceline, into the WMA A-AX soil investigation.

- Tank AY-102 is a DST subject to the DST portion of the Hanford Facility RCRA Permit.

- WMA A-AX is subject to the SST portion of the Hanford Facility RCRA Permit and TPA Action Plan Appendix I.

- The Tank Closure & Waste Management EIS (DOE/EIS-0391) specifically excludes DST closure decisions. Multiple sections of the EIS (e.g., Summary Section S.1.3.2, Sections 1.4.2 and 2.2) state, "Closure of DSTs would need to be addressed at a later date subject to appropriate NEPA review." The same or similar language is incorporated into multiple Federal Register notices associated with the EIS.

- Incorporation of AY-102 into WMA A-AX will trigger DOE reevaluation of the WMA A-AX groundwater monitoring plan/engineering evaluation and other permit addenda.

Questions

1. Conducting a corrective action process for the DST system would be required if there had been releases to the environment. Is Ecology proposing to subject the soils around DST AY-102 to a corrective action process, even though there is no indication of releases to soil from AY-102? If so, what is the rationale?

2. Is Ecology proposing to subject the soils around DST AY-102 to the SST corrective action process of TPA Action Plan Appendix I? If so, what is the rationale?

3. Is Ecology proposing to subject DST AY-102 (the tank itself) to the tank retrieval and closure process identified in TPA Action Plan Appendix I, which currently applies to only the SST system? If so, what is the rationale?

4. Is Ecology asking DOE to incorporate DST AY-102 (the tank itself) into the SST portion of the Hanford Facility RCRA Permit? If so, what is the rationale?

5. Is Ecology willing to consider landfill closure of DST AY-102 in conjunction with WMA A-AX, which would require development of additional NEPA documentation, technical evaluation of practicability, etc.?

6. What is the benefit of investigating soil around AY-102 in the near term, before DST AY-102 closure actions are undertaken?

7. Is Ecology's request that AY-102 be included in the WMA A-AX investigation driven by a concern about the overall schedule for conducting actions in and near WMA A-AX (given that DST closure actions are years out)?

8. Incorporation of soils around AY-102 into the WMA A-AX soil investigation will impact the WMA A-AX schedule and milestones. Is Ecology willing to accept WMA A-AX schedule/milestone impacts?

<u>200-E-131 Polygon</u>

Background Information

- Waste Site 200-E-131 was added to WIDS in 2001 as a consolidated waste site for soil contamination inside and adjacent to the 241-A, AN, AX, AY, and AZ Tank Farms.

- Within WIDS, 200-E-131 is assigned to WMA A-AX. However, 200-E-131 does not appear in the TPA.

- The polygon contains two waste sites (soil site UPR-200-E-18 and sample pit 200-E-285) as well as pipelines that the TPA assigns to the 200-IS-1 OU. This assignment is consistent with language throughout the TPA Action Plan (including Appendix I) and the Tank Closure & Waste Management EIS (e.g., Section 8.1.4) promoting integration of RCRA/CERCLA decisions for waste sites surrounding the SST farms. However, 200-IS-1 OU activities have been deprioritized to accommodate Ecology staff availability.

- The polygon also contains the 241-A-302B catch tank, which TPA CCF C-14-01 deleted from 200-IS-1 OU because "it is within the A-AX WMA and will be closed out as part of that WMA."

- DOE recommended segmenting the polygon from the tank farm portion of 200-E-131 and reassigning all the soil in the polygon area to 200-IS-1 OU, with the exception of the soil surrounding 241-A-302B. Ecology prefers that the entire polygon be assigned to WMA A-AX.

Questions

1. What is the basis for Ecology's request that soils located in the polygon be included in the WMA A-AX investigation?

2. Is Ecology proposing to move the investigation of soil in the polygon from the 200-IS-1 OU coordinated closure process and into the WMA A-AX corrective action process? If so, what is Ecology's rationale?

3. Is Ecology proposing to remove the pipelines and the sample pit from the 200-IS-1 OU coordinated closure process (see Milestones M-037-24/M-037-25) and into the WMA A-AX closure process? If so, what is Ecology's rationale?

4. Is Ecology's request that polygon soils be included in the WMA A-AX investigation driven by a concern about the overall schedule for conducting actions in and near WMA A-AX (given the current status of 200-IS-1 OU activities)?

5. If DOE reprioritizes activities for the 200-IS-1 OU waste sites in the polygon, does Ecology's Tank Systems Operation and Closure group have the resources to support Ecology's Central Plateau CERCLA/RCRA OU staff?

6. Incorporation of polygon soils into the WMA A-AX soil investigation will impact the WMA A-AX schedule and milestones. Is Ecology willing to accept WMA A-AX schedule/milestone impacts?

7. Ecology discussed an option to assign the southern portion of the polygon (containing catch tank 241-A-302B and a small section of pipeline) to WMA A-AX and the northern portion (containing the sample pit, UPR-200-E-18, and multiple pipelines) to 200-IS-1 OU. Could this option be explored further?