

# START

T000069  
0037594

ERDF Meeting Minutes  
August 24, 1993  
Ecology, Kennewick Office

~~Selection of a reduced number of alternatives for the ERDF trench design.~~

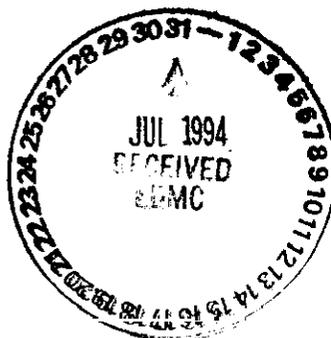
The U.S. Department of Energy (DOE) asked if the Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) could recommend a specific trench design. The Ecology replied that timing and ease of implementation must be considered for Phase I; it would be necessary to select an option which would not be delayed by public concerns. The recommended design is a Resource Conservation and Recovery Act (RCRA) double lined trench with leachate collection system. The DOE accepted this recommendation subject to finalized negotiations on trench design (August 26, 1993, Hanford Federal Facility Agreement and Consent order [Tri-Party Agreement] Negotiations Meeting).

The Westinghouse Hanford Company (WHC) raised a question regarding the need for additional modelling. Based on the lack of site specific data, a design cannot be chosen using a specified performance criteria and subsequent risk assessment; instead, a design must be chosen, then verified through performance and risk assessment. The Environmental Restoration and Disposal Facility (ERDF) design should continue in this manner for Phase I; should site specific information become available during Phase II, an alternate design could be evaluated at this time. It was noted that any remaining technical concerns about the mega trench concept could be resolved and still satisfy RCRA requirements.

### Discussion of EPA and Ecology Comments on the Siting Study

#### Attachment 1 - EPA Comments

- #5 - The U.S. Environmental Protection Agency (EPA) commented that mapping of the clastic dikes was necessary to identify preferential flow paths; these must be considered for monitoring purposes. The WHC responded that no value was gained from mapping the dikes because they are not positively identified as a path to ground water. The EPA replied mapping should occur at the time of excavation. The WHC concurred, adding that the response should be changed to "reject" to note these conflicting viewpoints.
- #6 - The EPA accepted this response.
- #7 - The WHC concurred with the EPA comment regarding geophysical surveys.



RECEIVED  
ERSDF  
SEP 15 1993

#11 - The WHC commented that this was previously an asbestos site and had undergone remediation. Remediation will be documented. While no radioactive contamination had been identified during remediation, a chemical survey had not been completed; the possibility remains that some chemical contamination may be present.

#12 - It was agreed to defer this until Operable Unit Investigations.

#14 - It was agreed to defer this until Operable Unit Investigations.

## Attachment 2 - Ecology Comments

#2 - The DOE commented that description of work would not be used and this would be addressed in the Operable Unit Investigations.

#3 - The DOE commented that the site wide mapping project would fulfill the ERDF mapping requirements.

#5 - The DOE commented that the siting study did review the seismic reports. It was agreed that the Ecology and the EPA would be given the opportunity to review the seismic report.

## Drilling Comments

The Ecology questioned well drilling for vadose zone sampling with specific concerns about phasing of the wells. The WHC responded that the current contract allowed drilling of shallow ground water wells, but no vadose or deep ground water. Drilling shallow ground water wells is allowable under the current contract; following contract modification, deep well drilling will be a priority.

The Ecology asked if this drilling sequence compromised sample integrity. The WHC replied that there is no known compromise in using this technique.

The Ecology asked what drilling schedule had been set. The WHC responded that shallow wells could be started this week. The WHC expressed concern about possible damage to old growth sagebrush caused by equipment access roads and drilling pads. While vadose zones have not been staked, machinery access to the center of the ERDF site will cause a considerable disturbance. The WHC also stated that vadose zone well information supports critical path aspects of the project. Although WHC does have concerns regarding the 200 area site, work must progress to remain on schedule.

The EPA stated that a major concern about the site is public opinion. While the affected parties may agree with the regulatory approach, public input has not yet been solicited. The WHC commented that the Working Group recommendations were applied in the site selection process. This group is comprehensive and should represent the public viewpoint.

The DOE raised the question of presentation to the public. How would public perception of the project be impacted if sampling begins prior to final site selection?

94320267

The Ecology asked if waiting for investigation would affect the critical path. The WHC responded that drilling delays would adversely affect critical path.

The Ecology questioned the resources available to investigate all three sites. The WHC responded that resources were not available for this investigation. The Ecology responded that the only recourse, unless irreparable harm is a concern, is to proceed based on impact to the critical path.

The Department of Wildlife (Wildlife) asked if any previous sites had been reconsidered for the smaller footprint required by the mega trench concept. The WHC responded that no sites had been revisited.

The Ecology asked what time and monetary expense would be involved in assessing alternative sites. The WHC responded that an engineering study would require eight to ten weeks; additional site evaluation, including biological assessment, is considerably more complex. The WHC commented that the footprint of a thirty-five foot deep mega trench precluded consideration of the W-5 Burial Grounds. The WHC commented that the recommendations of the Working Group were considered heavily during the siting process; these recommendations could preclude additional sites.

The Ecology commented, regarding public perception, that proceeding with sampling could be justified by technical complexity of re-evaluation.

The Wildlife indicated that Comprehensive Environmental Response Compensation and Liability Act (CERCLA) liability and natural resource injury must be considered. The costs and benefits of this site should be documented with respect to other potential sites. An explanation of how this site minimizes natural resource impact should be provided.

The Ecology asked if this could cause a critical path delay. The Wildlife responded that it could if not considered early enough in the siting process.

The Ecology questioned if the project damaged the habitat, would reconstruction be required. Additionally, should minimization of permanent damages be considered? The Wildlife stated that minimization must be considered.

The WHC asked who judges if the impact to the environment has been adequately minimized. The Wildlife stated that the Trustees must look at reasonable steps taken to avoid injury to resources.

The Ecology questioned what assurance would be given if an alternative site were selected. The Wildlife responded that, if site selection was optimized in terms of injury reduction combined with travel distance and other factors, there should be no concern. However, it must be made certain that this is the case.

The Wildlife also indicated that 43 CFR Part 11 (Department of Interior) should be consulted as a means of quantifying the environmental baseline. This will provide a point of comparison for examination of residual effects.

9413290 2169

The Ecology asked if it would be possible to get the environmental baseline as a part of the Conceptual Design Report. The WHC responded that baseline completion was dependant on siting the facility and further site characterization.

The Wildlife emphasized that for any site, a clear and well documented rationale must be made for using the area. It must show that any additional damage is reasonable and justifiable. The Wildlife noted that a dollar value could be assigned for area use lost time.

The DOE stated that the Natural Resource Damage Assessment (NRDA) process must be considered before presenting a finalize site to the public.

The WHC commented that discomfort exists concerning commencement of well drilling. The Ecology commented that the ramifications of drilling delays on the schedule must be fully understood.

The DOE stated that EPA and the Ecology need to identify siting concerns and make sure they are addressed. The Ecology stated that NRDA must be examined with regard to schedule. Regulations can not be circumvented by staff recommendation; any recommendations to do so must come from a higher level.

The WHC stated that, while an environmental baseline is not required, it is a good approach. The process needs to be in place; steps must be included in the process to defend these actions. There must be a strategy for proceeding.

As a final comment, the Wildlife stated that any candidate species must be considered as listed.

#### AGREEMENT FORM

Time of compliance to be stated on the agreement form was discussed. The Ecology indicated that a minimum of thirty years was acceptable for regulatory purposes, but that it might not be acceptable for design. The WHC indicated that it would be desirable to consider a longer period of time which could be modeled at specific instances during the period.

#### ACTION ITEMS

1. Complete a NPL agreement form before the next meeting.  
Assigned to: Bryan Foley  
Due: September 14, 1993
2. Draft a white paper on the CAMU/CERCLA vs. RCRA permit process.  
Assigned to: Bryan Foley  
Due: September 14, 1993

#### AGENDA ITEMS

1. Discuss siting and siting comments.

### Action Item List(s)

| NUMBER   | ASSIGNMENT                | DATE ASSIGNED | DATE CLOSED | ACTION   |
|----------|---------------------------|---------------|-------------|--|
| ERDF-1   | Pam Innis                 | 3/23/93       | 8/24/93     | Clarify the implication of "Risk Based Criteria" within the CAMU Rule.   |
| ERDF-2   | Rich Hibbard              | 3/23/93       | 8/24/93     | Evaluate the use of the W-5 trenches for ER generated mixed waste.   |
| ERDF-3   | Moses Jarayski            | 3/23/93       | 5/25/93     | Draft a list of suggested items to go into the letter from RL as a response to the CAMU letter coming from the regulators.   |
| ERDF-4   | Merl Lauterbach           | 4/27/93       | 5/11/93     | Prepare a detailed outline of the "package" that will be used for the CAMU application. The package should include a summary of the approach to satisfying the criteria specified in 40 CFR 264.552(c) and information on the proposed design options for the units.                       |
| ERDF-5   | Bryan Foley               | 4/27/93       | 5/11/93     | DOE is to formally transmit the Site Evaluation Report for the ERDF to the regulators.   |
| ERDF-6   | Vernon Bronen             | 4/27/93       | 5/11/93     | Westinghouse will outline the "barriers" to the use of the W-5 facility for disposal of past practice waste.   |
| ERDF-7   | Mel Adams                 | 4/27/93       | 5/11/93     | At the May 11 meeting, Mel Adams will present a matrix of different waste form and containment technology options. The goal is to compare the effectiveness of treatment and disposal options within the framework of varying compliance criteria cases.                                   |
| ERDF-8   | Pam Innis<br>Rich Hibbard | 5/11/93       | 8/24/93     | Comments were requested of both EPA and Ecology on the annotated outline which covers application of CAMU to the ERDF.   |
| ERDF-9   | Pam Innis<br>Rich Hibbard | 5/11/93       | 5/25/93     | Comments were requested of both EPA and Ecology with regard to the ERDF Treatment Engineering Screening Exercise.  |
| ERDF-10  | Moses Jarayski            | 5/25/93       | 6/8/93      | Removal and treatment of contaminated soils and solid waste is a planned option for remediation of source operable units. It may be necessary/optimal to locate treatment facilities outside of source operable unit boundaries. Determine the permitting requirements for this situation. |
| ERDF-11  | Bryan Foley               | 5/25/93       | 6/29/93     | Formally transmit the Characterization Plan to the regulators for comment.   |
| ERDF-12  | Merl Lauterbach           | 6/8/93        | Open        | Prepare and submit for discussion a listing of proposed documents to assist in guiding project work scope.   |
| ERDF-12  | Pam Innis                 | 6/8/93        | 8/24/93     | Define the parallel process to meet requirements for both a ROD and Site-wide permit.  |
| ERDF-12a | Bryan Foley               | 8/24/93       | Open        | Draft a white paper on the CAMU/CERCLA vs. RCRA permit process.  |
| ERDF-13  | Merl Lauterbach           | 6/8/93        | 6/29/93     | Establish a mechanism to reach consensus concerning the format and content of documentation required to reach both a ROD and fulfill requirements for the Site-wide Permit.  |
| ERDF-14  | Merl Lauterbach           | 6/8/93        | Open        | Ecology requested a presentation from the 100 Area treatability test group. The presentation will address new tests needed. This should occur after the results of the modeling exercise are complete.   |
| ERDF-15  | Bryan Foley               | 6/29/93       | Open        | Prepare a white paper drafting proposals for the following criteria: 1) Waste Acceptance Criteria, 2) Points of Compliance, 3) Time of Compliance, and 4) Treatment as a Requirement.  |
| ERDF-16  | Bryan Foley               | 8/24/93       | Open        | Complete NPL agreement form for Level II signature by the next meeting.  |

## ERDF Agreement List

### Agreements Recorded by Suzanne Clarke at the May 25 Meeting

- It was agreed that two additional disposal alternatives be included in the matrix of different containment and treatment technology options and that these be included in the modeling effort. The options to be added are:
  - Unlined disposal trench - grouted waste - dirt cover
  - Unlined disposal trench - grouted waste - hanford barrier
- It was agreed that the Site Characterization Plan would classified as a Secondary Document under the TPA. Therefore there will be a 45 day Regulator review period.

197-16911-261

Attendees

|                      |                |           |
|----------------------|----------------|-----------|
| Pamela S. Innis      | 376-4919       | B5-01     |
| Rich Hibbard         | (206) 493-9367 |           |
| Danielle E. Gilkeson | 376-0320       | A5-56     |
| Vern R. Dronen       | 376-0248       | A5-56     |
| Fred V. Roeck        | 376-8819       | H6-01     |
| George C. Evans      | 376-8938       | H4-23     |
| Bryan L. Foley       | 376-7087       | A5-19     |
| Jean H. Dunkirk      | 372-2330       | B3-15     |
| Ted Wooley           | 376-3012       | Flashcube |
| John Hall            | 736-3028       |           |
| Steve Cross          | 459-6675       |           |

01/21/2012

[22] From: Danielle E Gilkeson at -WHC85 9/27/93 1:22PM (31510 bytes: 8 ln, 2 f )  
To: Pamela S Innis at -TPA1, Rich Hibbard at \_Ecology\_Lacey,  
Vernon R (Vern) Dronen, Danielle E Gilkeson, Frederick V Roeck at -WHC300,  
George C Evans at -WHC304, Bryan L Foley at -DOE19, Jean H Dunkirk at -WHC52,  
Steve Cross at \_Ecology\_Lacey  
Subject: FINAL ERDF MEETING MINUTES

----- Message Contents -----

Text item 1:

Attached in WordPerfect 5.1 are the final meeting minutes for the August 24, 1993 ERDF meeting. Those comments that were received have been incorporated.

If you have any questions, contact Danielle Gilkeson at 372-0898.

Thank you

RECEIVED  
ERSDF  
OCT 08 1993