

**DISTRIBUTION  
PROJECT MANAGERS' MEETING,  
200 AREA GROUNDWATER SOURCE OPERABLE UNITS  
September 16, 2010**

DOE/RL

(No hard copy distribution)

EPA

Craig Cameron

B1-46

Ecology

Nina Menard

H0-57

CHPRC

Janice Williams (original)

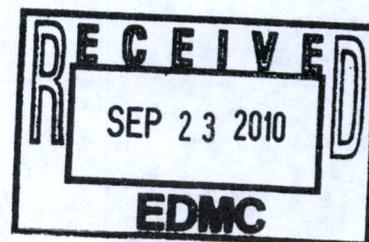
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Administrative Record (2)

H6-08

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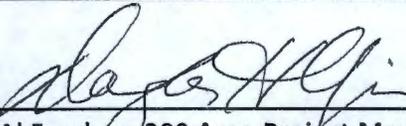
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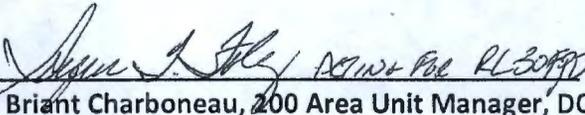


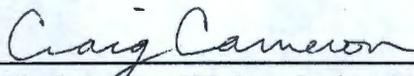
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D-23

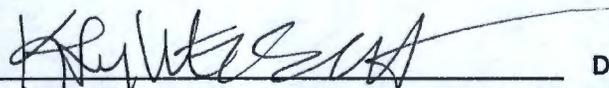
Meeting Minutes Transmittal/Approval  
Project Managers' Meeting  
200 Area Groundwater and Source Operable Units  
September 16, 2010

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APPROVAL:  DATE: 09/16/10  
for Al Farabee, 200 Area Project Manager, DOE/RL

APPROVAL:  DATE: 9/16/10  
for Briant Charboneau, 200 Area Unit Manager, DOE/RL

APPROVAL:  DATE: 9/16/10  
Craig Cameron, 200 Area Project Manager, EPA

APPROVAL:  DATE: 9/16/10  
for Nina Menard, 200 Area Project Manager, Ecology

HFFACO Action Plan Section 4.1 requires signature of agreements and commitments made during the Project Manager Meeting. Approval of these minutes documents approval of agreements and commitments documented in Attachment 4 to these minutes. Approval does not apply to any other attachments, which are included in these minutes for informational purposes.

**Minutes of the 200 Area Project Managers' Meeting of September 16, 2010 are attached. Minutes are comprised of the following.**

- |                     |  |
|---------------------|--|
| <b>Attachment 1</b> | <b>Attendance Record</b>   |
| <b>Attachment 2</b> | <b>Agreements and Issues List</b>  |
| <b>Attachment 3</b> | <b>Action Item List</b>  |
| <b>Attachment 4</b> | <b>Operable Units and Facilities Status</b>  |
| <b>Attachment 5</b> | <b>Annual Status Report for Central Plateau Institutional Controls</b>   |
| <b>Attachment 6</b> | <b>Notes of Thursday, August 05, 2010, RL/EPA/Ecology/CHPRC Meeting on Use of a Hanford WIDS Waste Site Reclassification Form and A CERCLA NTCRA Response Action Report for RL-0040 Projects (Nuclear Facility D&amp;D – Remainder of Hanford)</b> |

200 Area Project Managers' Status Meeting  
September 16, 2010

Please print clearly and use black ink

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
Janice Williams	CHPRC		
Bob Popielarczyk	CHPRC		
Doug Chapman	DOE-RL-0040		
CURT WALKER	CHPRC		
Jean Danni	YN		509-945-1100
Arline Tortoso	DOE		373-9231
Craig Cameron	EPA		
Greg SINTON	RL		
Laura Below	EPA		376-5469
JOHN MORSE	DOE		376-0051
Bryan Foley	DOE		376-7087
Asopuru Okemgba	Ecology		372-7956
Cathy Louie	RL		376-6834
NAOMI BUND	DOE		376-5527
Emy Laija	EPA		
J.L. Westcott	CHPRC		3-9800



**200 Area Project Managers' Meeting  
Agreements and Issues List  
September 16, 2010**

**Agreement:** None

**Issue:** None

**Delegations for September 16, 2010 PMM meeting:**

DOE/RL	Bryan Foley
DOE/RL	Cathy Louie
Ecology	Kim Welsch

200 Area Project Managers' Meeting  
September 16, 2010

CHPRC-1002580  
Attachment 3

OPEN ACTION ITEM TRACKING

Action #	Action/Subject	Assigned To	Owed To	Assigned Date	Original Due Date	Adjusted Due Date	Status
131	RL to follow up on 200-E-101 Deep Lysimeter Site WIIDS reclassification form	DOE/Frank Roddy	Ecology	8/19/10	9/16/10		
132	RL to provide S-SX 60% remedial design	DOE/John Morse	Ecology	8/19/10	9/16/10	9/16/2010	CLOSED - meeting held on 9/8/10

200 AREA PROJECT MANAGERS MEETING  
PROJECT STATUS UPDATES

September 16, 2010  
AGENDA

**CENTRAL PLATEAU INNER AREA**

200-WA-1  
200-EA-1 CMS & FS / CAD & PP  
200-PW-1/3/6  
SVE  
200-CW-5

**Inner Area: Central Plateau Burial Grounds**

200-SW-2

**Inner Area: Central Plateau Canyons & Facilities**

U Plant Canyon  
B Plant Canyon/Waste Sites

**Inner Area: Central Plateau Vadose Zone**

200-DV-1 RI/FS  
200-DV-1 Uranium  
200-DV-1 Tc-99 Desiccation Test

**BOTH INNER & OUTER AREAS**

200-IS-1CMS & FS / CAD & PP

**RCRA Units**

Hexone TSD Closure  
Other TSD Closures

**CENTRAL PLATEAU OUTER AREA**

200-OA-1, 200-CW-1, and 200-CW-3 FS/PP  
200-SW-1

**Field Work**

Rail Car Disposition  
200-MG-1  
200-CW-3  
200-BC Control Area  
West Lake  
Multi-Increment Sampling

**Risk Assessment**

Central Plateau Ecological Risk

**CENTRAL PLATEAU GROUNDWATER**

200-ZP-1 Interim Action

200 West P&T

200-UP-1 RI/FS

S/SX Interim Action

200-BP-5 and 200-PO-1 FS

200-BP-5 TTP

Groundwater Plumes – Final Remedy

Well Decommissioning

**FUTURE SCOPE (out-year TPA milestones)**

PUREX Canyon/Waste Sites

REDOX Canyon/Waste Sites

224B Concentration Facility

224T Transuranic Storage and Assay Facility

EE/CA Report(s)

## 200 AREA PROJECT MANAGERS MEETING PROJECT STATUS UPDATES

September 16, 2010

### CENTRAL PLATEAU INNER AREA

**200-WA-1 EPA Lead (RL- Arlene Tortoso, CHPRC – Mike Hickey)**

**P-015-91A, Submit RI/FS Work Plan for the 200-WA-1 to EPA, 12/31/2011**

**P-015-91B, Submit FS Report and PP for 200-WA-1 to EPA, 6/30/2013**

- Planning of the Central Plateau decision documents to align with the Tentative Agreement is on-going.
- A series of Agency meetings were conducted to scope the 200-WA-1 RI/FS Work Plan. The last meeting was August 10, 2010. A draft 200 West Inner Area RI/FS Work Plan Annotated Outline was provided to the agencies on September 9, 2010. Follow-up meetings will be scheduled to discuss any remaining issues.
- Continuing with the field preparation activities for the boreholes associated with the U-8 and U-12 cribs. The SAP that supports completion of these boreholes is undergoing review by Ecology.
- Continuing with field preparation for the characterization boreholes and drive points associated with the Supplemental RI/FS Work Plan (DOE/RL-2007-02, Rev 0).
  - Subsidence evaluations for 10 cribs are complete.
  - The electro-resistivity investigation, which is designed to assist in locating the deep boreholes, has been completed. Borehole locations in these cribs are being evaluated.
  - HGI is processing the 3-D inversion data.
  - Borehole drilling is anticipated to start in October 2010.
- Draft A of the Remedial Action Goals (RAGs) regulatory compliance document (DOE/RL-2007-34 Rev. 1), incorporating Ecology comments, was submitted to DOE-RL on August 30, 2010.
- A Decisional Draft document which details the analytical and numerical modeling schemes that derive soil cleanup levels protective of groundwater is under development and scheduled for completion this fall.

Schedule Status: Planning for the Central Plateau decision documents to achieve the Tentative Agreement milestones is underway.

### Regulator Comments:

**200-EA-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Caroline Melton)****P-015-92A, Submit RFI/CMS and RI/FS Work Plan for the 200-EA-1 to Ecology, 12/31/2012**

- Planning of the Central Plateau decision documents to align with the Tentative Agreement is ongoing.
- Data validation for the K, L, and M wells is complete. The DQA report is finished.

**200-EA-1 & 200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Greg Berlin)****P-015-92B, Submit CMS & FS & Proposed CA Decision/PP for EA-1 & IS-1 to Ecology, 6/30/2014**

- Periodic meetings with Ecology and EPA to establish a pipeline decision logic and alignment with the Tentative Agreement were initiated in early June and are continuing.

Schedule Status: Planning for the Central Plateau decision documents to achieve the Tentative Agreement milestones is underway.

Regulator Comments:**200-PW-1/3/6 EPA Lead (RL- Arlene Tortoso, CHPRC – Mike Hickey)**

- The draft C version of the feasibility study, and the decisional draft version of the proposed plan for CW-5 and PW-1/3/6 were provided to RL for review September 10, 2010.

**Soil Vapor Extraction System (SVE): (RL- Arlene Tortoso, CHPRC –Mark Byrnes)**

- RL and EPA approved the following modification to the Carbon Tetrachloride Expedited Response Action Soil Vapor Extraction System Operating Plan for FY 2010: The SVE system at the 216-Z-9 site will be used during October 2010 (rather than November 2010 as indicated in the plan) to support field testing of characterization methods. The SVE system at Z-1A site will continue to operate in October as originally planned.
- The two new SVE units are running smoothly.

Schedule Status: on schedule

Regulator Comments:

**200-CW-5 EPA Lead (RL- Greg Sinton, CHPRC – Mike Hickey)**

- Draft C feasibility study transmittal to EPA was distributed on August 18, 2010. There is a 45 day review period scheduled for the EPA review ending approximately October 4, 2010.
- The Decisional Draft Proposed Plan for CW-5 and PW-1/3/6 is undergoing RL review. The preferred alternative for CW-5 sites currently specified in the draft proposed plan is RTD with waste disposal at ERDF (with the exception of the north portion of 216-Z-1D which is No Action).

Schedule Status: on schedule

Regulator Comments:

**Inner Area: Central Plateau Burial Grounds**

**200-SW-2 Ecology Lead (RL – Doug Hildebrand, CHPRC – Greg Berlin)**

**P-015-93A, Submit Revised RFI/CMS and RI/FS Work Plan for 200-SW-2 to Ecology, 12/31/2011**

**P-015-93B, Submit RFI/CMS & RI/FS & Proposed CA Decision/PP for SW-2 to Ecology, 12/31/2016**

- Continued meeting with Ecology to align with the Tentative Agreement and plan for the HAB Committee of the Whole (public) meeting on the solid waste burial grounds (scheduled for October 5, 2010 in Richland, and at other locations in northwest region in later October)

Schedule Status: Planning for the Central Plateau decision documents to achieve the Tentative Agreement milestones is underway.

Regulator Comments:

**Inner Area: Central Plateau Canyons and Facilities**

**U Plant Canyon EPA Lead (RL – Wade Woolery, CHPRC – Dottie Norman)**

**P-016-200A, Complete U Plant Canyon (221-U) Demolition in accordance w/ RD/RAWP, 9/30/2017**

**P-016-200B, Complete U Plant Canyon (221-U) Barrier Construction in accordance w/ RD/RAWP, 9/30/2021**

- RL is reviewing the revised DSA.
- Project status presentation to the HAB RAP scheduled for September 15, 2010.

Decisions and recommendations from the D4 Project Status Meetings are to be codified in the 200 Area PMM Meeting Minutes. The following decisions and recommendation are from the July 13, 2010 D4 Project Status Meeting

TK-D-10 will be removed from cell 30 in whole and shipped to T Plant for interim storage pending processing and packaging for disposal to WIPP. Key tank preparation activities include: placement of an absorbent sock into the tank to absorb free liquids; installation of dust covers on the tank nozzles and center agitator flange opening; installation of four NUCFIL filters on the center agitator flange opening; and conducting a tank integrity assessment. A Potential-to-Emit calculation was prepared specific for this activity and concluded the disposition activity would constitute a major activity; monitoring will be required for PTE activities. This is consistent with the previous tank disposition option. The activities that present a potential-to-emit (i.e., tank preparations) will be monitored with fixed head/gooseneck air samplers at the cell 30 location.

RL/EPA agreed that an Explanation of Significant Difference (ESD) to address the change in approach for handling TK-D-10 from that discussed in the ROD is not required, rather an Off-Site Waste Determination will be prepared identifying the TRU waste would be sent to T Plant for storage and future processing rather than storage at CWC. A letter will be prepared for submission to the Administrative Record (AR) documenting the current path forward for TK-D-10 represents a non-significant change to the ROD. A notice of addition to the AR could also be prepared.

RL/EPA agreed that a TPA-CN addressing the changes in approach for TK-D-10, grout plans, demolition plans (e.g., collapsing the operating gallery) was not needed as the design phasing discussion within the RAWP provides enough flexibility to cover these changes.

**Regulatory Documents EPA Lead (RL- Wade Woolery, CHPRC – Dottie Norman / Curt Walker)**

- The decisional draft combined 30%/60% design package for grout was provided to RL.
- The 90% decisional draft design package for TK-D-10 is being drafted.

From the July 13, 2010 D4 Project Status Meeting, the following decisions and recommendations were approved for the grout, D10 Tank, and canyon demolition design packages.

- Grout
  - 30% and 60% design packages can be combined into one report
  - Consolidated design package will include the following:
    - Grout presentation
    - Engineering drawings
  - Consolidated design package requires EPA approval before submittal of 90% design package and will be submitted as a secondary document per the TPA.
  - 90% design package will include the following:
    - Schedule
    - Schematic for batch plant(s)
    - Location of pump skids
  - 90% design package will be a DOE/RL document and submitted as a primary document per the TPA.
- Tank D-10 Disposition
  - No 30%/60% design packages required
  - 90% design package does not have to be issued as a DOE document now but will be included in the pending RDR
  - 90% design package will include the following information/components:
    - Packaging and transportation decisions
    - Stabilization methods for the liquid
    - Transportation and storage container specifications
    - Potential-to-Emit calculations
    - Rational supporting an offsite waste determination for T Plant storage
- Demolition
  - 30% design package will be the submittal of the radiological modeling for U Canyon.
  - 60% design package will be the Request For Proposal for the explosives demolition contractor.
  - 90% design package will include the following:
    - Determination on extent and form of contamination remaining in the U Canyon.
    - Radiological air modeling, dispersion calculations

- Review / applicability of ambient air monitoring stations, number and locations
- Engineering calculations / plans (to include viability of soil cushion during implosion)

Schedule Status: On schedule

Regulator Comments:

**B Plant Canyon/Waste Sites Ecology Lead** (RL – Naomi Bland, CHPRC – Mike Hickey)

**P-85-10A, Submit RI/FS Work Plan for 200-CB-1, 12/21/2011**

- Planning of the Central Plateau decision documents to align with the Tentative Agreement is ongoing.

Schedule Status: As above.

Regulator Comments:

**Inner Area: Central Plateau Deep Vadose Zone**

**200-DV-1 Ecology Lead** (RL – John Morse, CHPRC – Marty Doornbos)

**P-015-110A, Submit RFI/CMS & RI/FS Work Plan for 200-DV-1 to Ecology, 9/30/2012**

**P-015-110B, Submit CMS & FS & PP/Proposed CA Decision for 200-DV-1 to Ecology, 9/30/2015**

- Held a kickoff meeting on August 24, 2010 with the regulators for the RFI/CMS & RI/FS WP.
- Continued with baseline planning

Schedule Status: Submittal of the RFI/CMS & RI/FS Work Plan is on schedule.

Regulator Comments:

**200-DV-1 Ecology Lead (RL – John Morse, CHPRC – Glen Chronister)**  
**P-015-110C, Submit Uranium Treatment FTP Draft A per Deep Vadose Zone  
Treatability Test Plan, DOE/RL-2007-56 to Ecology, 12/31/2010**

Uranium Sequestration Pilot Test:

- Continued drafting the Uranium Sequestration Field Test Plan and Sample Analysis Plan. The draft should be complete by mid-September and will undergo internal review at that time.

Schedule Status: On schedule

Regulator Comments:

**200-DV-1 Ecology Lead (RL – John Morse, CHPRC – Glen Chronister)**  
**P-015-110D, Submit Tc-99 Pilot Scale Treat. Study Test Report per Deep  
Vadose Zone Treatability Test Plan, DOE/RL-2007-56 to EPA, 6/30/2012**

Desiccation Test

- Installation of the concrete pads for the instrument and electrical distribution panels has been completed.
- The main six instrument panels have been installed in the field.
- The Field Test Plan and associated Sample Analysis Plan are now in final tech editing. A transmittal letter asking for DOE and EPA approval will be routed for approval upon receipt of the FTP and SAP from the tech editing group.
- Excavation and installation of conduit for the data trailer and the power pole has been completed including backfill of the trench.

Schedule Status: On schedule

Regulator Comments:

**BOTH INNER & OUTER AREAS**

**200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Greg Berlin)**  
**P-015-90, Submit Revised RFI/CMS and RI/FS Work Plan for 200-IS-1 to  
Ecology, 6/30/2011**

- Continued scoping meetings with Ecology and EPA to align the 200-IS-1 RI/FS Work Plan with the Tentative Agreement.

Schedule Status: Planning for the Central Plateau decision documents to achieve the Tentative Agreement milestones is underway.

**Regulator Comments:**

**RCRA Units**

**Hexone TSD Closure Ecology Lead (RL- Kevin Leary, CHPRC – Greg Berlin)**

**M-037-01, Submit Revised Closure Plan to support TSD closure of the Hexone Storage and Treatment Facility (276-S-141/142) TSD unit, 12/30/2010**

- The Hexone Storage and Treatment Facility Closure Plan and SAP was transmitted to Ecology for review on July 16, 2010. Ecology requested an extension on September 14, 2010 via e-mail and plans on providing comments on September 27, 2010.

Schedule Status: Ahead of schedule.

**Regulator Comments:**

**Other TSD Closures**

**M-037-02, submit Revised Closure Plans to support TSD closure for five (5) TSD Units: 207-A South Retention Basin, 216-B-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench, 06/30/2014**

**M-037-03, Submit Revised Closure Plans to support TSD closure for two (2) TSD Units: 216-B-3 Main Pond system, and 216-S-10 Pond and Ditch, 4/30/2012**

**M-037-10, Complete Unit-Specific Closure Requirements According To The Closure Plan(s) For seven (7) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A36B Crib, 216-A-37-1 Crib, 216-B-63 Trench, Hexone Storage and Treatment Facility (276-S-141/142), and 241-CX Tank system (241-CX-70/71/72), 9/30/2020**

**M-037-11, Complete unit-specific closure requirements for two (2) TSD Units; 216-B-3 Main and Pond system and 216-S-10 Pond and Ditch, 9/30/2016**

## CENTRAL PLATEAU OUTER AREA

### **200-CW-1, 200-CW-3, 200-OA-1 EPA Lead (RL – Greg Sinton, CHPRC – Tina Crane) P-015-38B, Submit Revised FS Report & Revised PP for CW-1, -CW-3, and OA-1 to EPA, 4/30/2012**

- Work continues to transition the existing activities to align with the Tentative Agreement, including development of the RI/FS Work Plan.
- Approximately Bi-weekly EPA/RL/CHPRC meetings are continuing. Discussions have included status of the annotated outline for the RI/FS work plan, selection of COPCs for Outer Area waste sites, baseline risk assessment and evaluation of the data that has been accumulated for Outer Area waste sites.
- The West Lake Draft A SAP was submitted to regulators on July 14, 2010 and comments were received from Ecology September 10, 2010. A comment resolution meeting will be scheduled in the near future.
- Draft 216-S10 permit conditions were discussed with Ecology in a September 9, 2010 meeting focusing on integration of the TSD closure and CERCLA processes.

Schedule Status: On Schedule (Tentative Agreement schedule)

#### Regulator Comments:

### **200-SW-1 Ecology Lead (RL: Kevin Leary, CHPRC – Tina Crane)**

- The NRDWL/SWL Closure/Post-closure Plan, Rev. 2 is being finalized and is expected to be transmitted to Ecology prior to September 30, 2010. In addition, the Groundwater Monitoring plan, Rev. B is also targeted for transmittal to Ecology prior to September 30, 2010 for submittal to RL.
- Based on public comments received on the interim EA, RL has determined the need to reissue the interim EA to thoroughly address all public comments and to repeat the public comment phase. RL will invite Ecology to participate as a cooperating agency to support the draft interim EA revisions.
- The draft Memorandum of Understanding for the use of Borrow Area C is under revision based on tribal parties input. It will be revised this month and resubmitted to the SHPO and ACHP for final signatures.

Schedule Status: The schedule for the draft Interim EA re-issue is in development with completion anticipated prior to September 30, 2010. Finalizing the interim EA is critical to fulfilling the SEPA process requirements needed for Ecology's final approval of the Closure Plans and Groundwater Monitoring Plan.

Regulator Comments: Ecology continues to be concerned about the funding for the Engineering Design of the Closure Plan.

### Field Work

#### **Rail Car Disposition EPA Lead (RL: Frank Roddy, CHPRC – Dottie Norman)**

- The Action Memorandum addendum and Removal Action Work Plan decisional drafts are in internal review.
- The decisional draft Sampling and Analysis Plan is in internal review.

Schedule Status: On schedule

### Regulator Comments:

#### **200-MG-1 EPA/Ecology Lead (RL: Frank Roddy, CHPRC – Curt Walker)**

- Field work continues on waste sites in the Outer Area (including 216-S-19, 216-S-26).
- On March 9, 2010, Ecology was provided the WIDS Waste Site Reclassification form for the 200-E-101 waste site. Ecology submitted informal comments in July and a revision was returned approximately one week later (still in July). Ecology has agreed to sign the form and is currently processing the form through their correspondence process.
- On June 9, 2010, RL transmitted the RAWP (Rev. 1) for 37 additional 200-MG-1 waste sites to Ecology for approval. Informal comments from Ecology were received August 9; resolution was returned August 27, 2010.
- On June 10, 2010, RL provided Ecology the RAR (DOE/RL-2009-123, Rev. 0, February 2010) and the WIDs Waste Site Reclassification Forms for the 200-E-110 and the UPR-600-21 Waste Sites. On July 27, 2010, informal comments were received from Ecology; further modification made to RAR as a result of RL/EPA/Ecology meeting on RARs in general; comment resolution version anticipated to be returned in September
- On August 3, 2010, informal comments were received from Ecology on the WIDS Waste Site Reclassification Form and Response Action Report (DOE/RL-2009-133, May 2010 Draft) for the 600-51 Waste Site; further modification made to RAR as a result of RL/EPA/Ecology meeting on RARs in general; comment resolution version anticipated to be returned in September.

Schedule Status: On schedule

Regulator Comments:

**200-CW-3 EPA Lead (RL: Frank Roddy, CHPRC – Tina Crane)**

- RTD of 216-N-1 Pond is complete. RAR (DOE/RL-2010-64) is in informal RL review. RL comments are being incorporated.
- Excavation of 216-N-4 Pond is complete.
- Excavation of 216-N-6 Pond is complete.

Schedule Status: On schedule

Regulator Comments:

**200-BC Control Area (BCCA) Ecology Lead (RL – Doug Chapin, CHPRC – Bo Wier)**

- BCCA North Zone A (~ 140 acres): As of the week of September 13, 2010, ~208,000 tons over ~57 acres, cumulative, have been disposed of at ERDF, using seven super dump trucks in service.
- BCCA North Zone B (~3,660 acres): Approximately 1,566 acres, cumulative, remain down posted to date.
- BCCA South Zone C:
  - On August 24, 2010, RL and CHPRC met to discuss a proposed regulatory approach for the removal of contaminated soil that, along with any additional CERCLA and other regulatory documents, will be required for Zone C. Discussions continue between RL and CHPRC to finalize the approach and the timing to bring this forward to the regulators.
  - Radiological characterization of a number of scattered hot spots was begun.
  - Preparation of a draft survey report of an ecological field survey (completed June 30, 2010) was continued, as PNNL resolves a path forward for performing remediation work among the Zone C natural resources.

Schedule Status: On schedule

Regulator Comments:

**Multi-Increment Sampling Ecology Lead** (RL – Frank Roddy, CHPRC – Dave Chojnacki)

- Block 1 and 2 excavation to final depth has been obtained. MIS verification sampling is complete.

Regulator Comments:

**Risk Assessment**

**Central Plateau Ecological Risk Assessment EPA/Ecology Lead** (RL – Jim Hansen, CHPRC – John Lowe)

- RL will be reviewing the reformatted Central Plateau Ecological Risk Assessment Data Package starting September 30, 2010.
- Completing technical report on ecological PRG development (based on information presented in the data package report). Integrating PRG Developments with the RCBRA. Expect to transmit an initial draft of the PRG documents to RL in October.
- Biointrusion Technical report: Incorporating comments received from the Agencies. Developing schedule for resubmittal to RL.
- Initiating planning for Ecological data collection to support the Outer Area RI/FS.

Schedule Status:

Regulator Comments:

## CENTRAL PLATEAU GROUNDWATER

### **200-ZP-1 Interim Action EPA Lead (RL – Arlene Tortoso, CHPRC – Mark Byrnes)**

- 11 of the 14 groundwater extraction wells are on line pumping water at a rate of approximately 428 gpm. Extraction well 299-W15-36 will be kept offline due to very low flow rates. Extraction wells 299-W15-34 and 299-W15-765 are offline due to electrical problems that are currently being assessed.
- Extraction wells 299-W11-45 and 299-W11-46 are both running and are pumping at a combined rate of ~26 gpm to ETF. A reduced flow rate is required through the end of August to allow ETF to drain one of their other basins which is full.

Schedule Status: On schedule.

#### Regulator Comments:

### **200 West P&T EPA Lead (RL – Arlene Tortoso, CHPRC – Mark Byrnes)**

**P-016-124, Submit 200-ZP-1 Remedial Design Report, 8/31/2010**

**P-016-122, Begin Phase 1 Operation of 200W Pump and Treat System, 12/31/2011**

- Comments from EPA on Draft A Remedial Design Report were received and responses are being prepared at this time.
- Drilling and sampling of 18 permanent extraction/injection wells are now complete. Currently drilling EW-6, which is currently at a depth of approximately 305 feet.
- Rev. 1 of the Operations and Maintenance Plan has been issued.
- Treatability testing is ongoing for evaluating GAC as a cost effective alternative to using Purolite resin for removing Tc-99 from groundwater.
- Test plans are currently being prepared to:
  - Support the testing of a variety of resins and SMI for removing COCs
  - Evaluate the effectiveness of: insitu bioremediation, air jutting, Ivey-Sol surfactant, well head silver impregnated GAC.
- Construction has been initiated on the Radiological and Bio-Process buildings and well transfer buildings.

Schedule Status: On schedule.

#### Regulator Comments:

**200-UP-1 EPA Lead** (RL – Naomi Bland, CHPRC – Curt Wittreich)

**P-015-17A, Submit a 200-UP-1 RI and FS Report and PP to EPA, 9/30/2010**

- The Draft A 200-UP-1 OU RI/FS Report and Proposed Plan is being finalized for transmittal to the regulators by September 30, 2010. A regulator briefing on the FS and Proposed Plan will be scheduled after transmittal of the Draft A documents.

**S/SX Tank Farm Interim Action EPA/Ecology Lead** (RL – John Morse, CHPRC – Curt Wittreich)

**P-016-120, GW Treatment System <50 gpm for Tc-99 Plume at S/SX Tank Farm, 12/31/2011**

- The 90% remedial design package for the WMA S-SX extraction system is in preparation. A construction subcontract for the transfer building, above ground pipeline, and associated systems has been awarded. Five of eight pipeline roadway crossings have been completed.

Schedule Status: On schedule

Regulator Comments:

**200-BP-5, PO-1 Ecology Lead** (RL – John Morse, CHPRC – Curt Wittreich)

**P-015-21A, Submit 200-BP-5 and 200-PO-1 FS Report and PP(s) to Ecology, 12/31/2012**

- Preparing the 200-BP-5 RI Report
- The Draft A 200-PO-1 RI Report was transmitted to the Regulators on June 10, 2010 for review. Ecology requested an additional extension to submit comments by September 17, 2010.

Schedule Status: 200-BP-5 and 200-PO-1 FS Report and PP is on schedule.

Regulator Comments

**200-BP-5 Ecology Lead (RL – John Morse, CHPRC – Curt Wittreich)**

**M-015-82A, Submit Treatability Test Plan as Amendment of 200-BP-5 WP, 12/31/2010**

**M-015-82B, Initiate 200-BP-5 Aquifer Tests Within 6 months of TTP Approval, approval of TPP + 6 months**

- The Draft A 200-BP-5 Treatability Test Plan is being finalized for transmittal to the regulators by the end of October.

Schedule Status: Treatability Test Plan is ahead of schedule.

Regulator Comments:

**GW Plumes EPA/Ecology Lead (RL – John Morse)**

**P-016-119-T01, Remedy in Place to Contain GW Plumes in 200 NPL Area, 12/31/2020**

- Draft Annual Report provided to EPA and Ecology

Schedule Status: TBD

Regulator Comments:

**Well Decommissioning EPA/Ecology Lead (RL – John Morse, CHPRC – Chris Wright)**

	August		Cumulative	
	Planned	Completed	Planned	Completed
Decommissioning Total	17	4	152	174

Schedule Status: TBD

Regulator Comments:

**FUTURE SCOPE (out-year TPA milestones)**

**PUREX Canyon/Waste Sites** *Ecology Lead* (RL – Frank Roddy, CHPRC – Curt Walker)

**P-85-20A, Submit RI/FS Work Plan for 200-CP-1, 9/30/2015**

**REDOX Canyon/waste sites** *EPA Lead* (RL – Naomi Bland, CHPRC – Curt Walker)

**P-85-30A, Submit RI/FS Work Plan for 200-CR-1, 12/31/2017**

**224B Concentration Facility** *EPA Lead* (RL- Kevin Leary, CHPRC – Curt Walker)

**M-085-50, Submit revised removal action work plan for the 224B Concentration Facility in accordance with the Action Memorandum for the Non-Time Critical Removal Action for the 224-B Plutonium Concentration Facility (DOE/RL-2004-36).** A change package with a completion milestone will accompany the submittal of the work plan, 12/31/2015

**224T Transuranic Storage and Assay Facility** *Ecology Lead* (RL- Kevin Leary, CHPRC – Curt Walker)

**M-085-51, Submit removal action work plan for the 224T Transuranic Storage and Assay Facility in accordance with the Action Memorandum for the Non-Time-Critical Removal Action for the 224-T Plutonium Concentration Facility (DOE/RL-2004-68).** A change package with a completion milestone will accompany the submittal of the work plan. 12/31/2025

**EE/CA Report(s)** *EPA & Ecology Lead* (RL – Doug Chapin, CHPRC, Tina Crane)

**M-85-60, Complete EE/CA report(s) for all Tier 2 facilities listed in Appendix J, 3/31/2018**

- 200 E Tier 2 Facilities EE/CA: Planning continues. RL is currently doing an internal review of a proposed, initial schedule provided by CHPRC on September 15, 2010.
- 200 W Tier 2 Facilities EE/CA: In planning; schedule details to follow.

**2010 Status of Institutional Controls for Central Plateau Interim and Final Record of Decisions**

Below are the institutional controls that have been identified in Central Plateau (200 Area NPL Site) interim and final Record of Decisions. In summary, no findings were identified in 2010.

Institutional Controls Requirements Listed in EPA/ROD/R10-97/048, Record of Decision 200-UP-1 Operable Unit.

<b>Institutional Controls Category</b>	<b>Institutional Controls Requirement</b>	<b>2010 Status</b>
Land-Use Management Entry Restrictions	Institutional controls are required to prevent human exposure to groundwater. DOE is responsible for establishing and maintaining land-use and access restrictions until the final remedy is selected and implemented.	No findings, land use access restriction still in place.
Miscellaneous Provision	Institutional controls include placing written notification of the remedial action in the facility land-use master plan.	No findings.
Land-Use management	DOE will prohibit any activities that would interfere with the remedial activity without the lead agency's concurrence.	No findings, no activities have occurred that have interfered with the interim remedial action.
Land-Use Management	In addition, measures necessary to ensure the continuation of this restriction will be taken in the event of any transfer or lease of the property before the final remedy is selected. A copy of the notification in a land-use plan will be given to any prospective purchaser/transfer before any transfer or lease. DOE will provide the Washington State Department of Ecology and U.S. Environmental Protection Agency within written verification that these restrictions have been put in place.	No findings.

Institutional Controls Requirements (Required through the Time of Completion of Remedy Construction) Listed in Record of Decision for 221-U Facility (Canyon Disposition Initiative).

<b>Institutional Controls Category</b>	<b>Institutional Controls Requirement</b>	<b>2010 Status</b>
Entry Restrictions	DOE shall control access to prevent unacceptable exposure of humans to contaminants at the 221-U Facility site addressed in the scope of this ROD until remedy construction is complete. Visitors entering any site areas are required to be badged and escorted at all times. See Figure 7 of the 221-U Facility ROD (US EPA 2005) for a site map showing the extent of the 221-U Facility site and the boundaries of the land-use controls. A more detailed map will be developed and included in the RD/RA work plan to be approved by EPA and Ecology.	No findings, access controls still in place.
Land-Use Management	No intrusive work shall be allowed at the 221-U Facility site unless the EPA and Ecology have approved the plan for such work and that plan is followed.	No findings, work plans are being/have been submitted for approval.
Land-Use Management	DOE shall prohibit well drilling at the 221-U Facility site except for monitoring, characterization, or remediation wells authorized in EPA- and Ecology-approved documents.	No findings, no unauthorized wells have been drilled.
Groundwater-Use Management	Groundwater use at the 221-U Facility site is prohibited, except for limited research purposes and monitoring and treatment authorized in EPA- and Ecology-approved documents. This prohibition applies until drinking water standards are achieved and EPA and Ecology authorize removal of restrictions. Decision documents for the 200-UW-1 Source Operable Unit and 200-UP-1 Groundwater Operable Unit as well as the Sitewide institutional controls plan will contain the institutional controls and implementing details prohibiting well drilling and groundwater use in the U Plant Area and portions of the 200 West Area as defined in those decision documents.	No findings, no unauthorized groundwater use has occurred.

Institutional Controls Requirements (Required through the Time of Completion of Remedy Construction) Listed in Record of Decision for 221-U Facility (Canyon Disposition Initiative).

Institutional Controls Category	Institutional Controls Requirement	2010 Status
Warning Notices	DOE shall post and maintain warning signs along access roads to caution site visitors and workers of potential hazards from the 221-U Facility site.	No findings, warning signs are in place.
Miscellaneous Provision	In the event of any unauthorized access to the site, such as trespass, DOE shall report such incidents to the Benton County Sheriff's Office for investigation and evaluation of possible prosecution.	No findings, no unauthorized access to the site has occurred.

Institutional Controls Requirements Listed in Record of Decision Hanford 200 Area 200-ZP-1 Superfund Site Benton County, Washington.

Institutional Controls Category	Institutional Controls Requirement	2010 Status
Entry Restrictions	The DOE shall control access to prevent unacceptable exposure of humans to contaminants in the 200-ZP-1 OU groundwater addressed in the scope of this ROD until the remedy is complete. Visitors entering any site areas of the 200-ZP-1 OU will be required to be badged and escorted at all times.	No findings, access controls are in place.
Land-Use Management	No intrusive work shall be allowed in the 200-ZP-1 OU unless EPA has approved the plan for such work and that plan is followed.	No findings, work plans are being/have been submitted for approval.
Land-Use Management	The DOE shall prohibit well drilling in the 200-ZP-1 OU, except for monitoring, characterization or remediation wells authorized in EPA approved documents.	No findings, no unauthorized wells have been drilled.

Institutional Controls Requirements Listed in Record of Decision Hanford 200 Area 200-ZP-1 Superfund Site Benton County, Washington.

Institutional Controls Category	Institutional Controls Requirement	2010 Status
Groundwater-Use Management	Groundwater use in the 200-ZP-1 OU is prohibited, except for limited research purposes, monitoring, and treatment authorized in EPA approved documents. The <i>Sitewide Institutional Controls Plan</i> will contain the institutional controls and implementing details prohibiting well drilling and groundwater use in the 200-ZP-1 OU, as defined in the Decision document for the 200-ZP-1 OU.	No findings, no unauthorized groundwater use has occurred.
Warning Notices	The DOE shall post and maintain warning signs along pipelines conveying untreated groundwater that caution site visitors and workers of potential hazards from the 200-ZP-1 OU groundwater.	No findings, signs have been/will be installed along pipelines.
Miscellaneous Provision	In the event of any unauthorized access to the site (e.g., trespassing), DOE shall report such incidents to the Benton County Sheriff's Office for investigation and evaluation of possible prosecution.	No findings, no unauthorized access to the site has occurred.
Land-Use Management	Activities that would disrupt or lessen the performance of the pump-and-treat, MNA (Monitored Natural Attenuation), and flow-path control components of the remedy are to be prohibited.	No findings, no activities have been implemented that would disrupt/lesson performance of remedy.
Land-Use Management	The DOE shall prohibit activities that would damage the pump-and-treat, MNA, and flow-path control components (e.g., extraction wells, injection wells, piping, treatment plant, or monitoring wells).	No findings, no activities have been implemented that would damage the remedy components.
Miscellaneous Provision	The DOE shall report on the effectiveness of institutional controls for the 200-ZP-1 OU remedy in an annual report, or on an alternative reporting frequency specified by EPA. Such reporting may be for this OU alone or may be part of a Hanford sitewide report.	No findings.

Institutional Controls Requirements Listed in Record of Decision Hanford 200 Area 200-ZP-1  
Superfund Site Benton County, Washington.

Institutional Controls Category	Institutional Controls Requirement	2010 Status
Land-Use Management	The DOE will provide notice to EPA at least six months prior to any transfer or sale of the any land above the 200-ZP-1 OU so EPA can be involved in discussions to ensure that appropriate provisions are included in the transfer terms or conveyance documents to maintain effective institutional controls. If it is not possible for DOE to notify EPA at least six months prior to any transfer or sale, then the DOE will notify EPA as soon as possible but no later than 60 days prior to the transfer or sale of any property subject to institutional controls. In addition to the land transfer notice and discussion provisions above, the DOE further agrees to provide EPA with similar notice, within the same time frames, as to federal-to-federal transfer of property. The DOE shall provide a copy of executed deed or transfer assembly to EPA.	No findings, no transfer/sale of land has taken place.
Land -Use Management	The DOE will prevent the development and use of property above the 200-ZP-1 groundwater OU for residential housing, elementary and secondary schools, childcare facilities and playgrounds.	No findings, no property development has taken place.
Land -Use Management	Land use controls will be maintained until cleanup levels are achieved and the concentrations of hazardous substances in groundwater are at such levels to allow for unrestricted use and exposure and EPA authorizes the removal of restrictions.	No findings, land use controls are still in place.

Explanation of Significant Differences (ESD) for the Interim Action Record of Decision for the 200-UP-1 Groundwater Operable Unit, Hanford Site, Benton County Washington.

Institutional Controls Category	Institutional Controls Requirement	Sections of the Plan Where Institutional Controls are Addressed
Entry Restrictions	The DOE shall control access to 200-UP-1 Groundwater OU to prevent unacceptable exposure of humans to contaminants, except as otherwise authorized in Ecology approved documents.	No findings, access controls are in place.
Entry Restrictions	Visitors entering any site areas of the 200-UP-1 Groundwater OU will be required to be badged and escorted at all times.	No findings.
Land-Use Management	No intrusive work shall be allowed in the 200-UP-1 Groundwater OU unless Ecology has approved the plan for such work and that plan is followed.	No findings, no intrusive work has occurred without prior approval.
Land-Use Management	The DOE shall prohibit well drilling in the 200-UP-1 Groundwater OU, except for monitoring, characterization or remediation wells authorized in Ecology approved documents.	No findings, no unauthorized wells have been drilled.
Groundwater-Use Management	Groundwater use in the 200-UP-1 Groundwater OU is prohibited, except for limited research purposes, monitoring, and treatment authorized in Ecology approved documents.	No findings, no unauthorized use of groundwater has occurred.
Warning Notices	The DOE shall post and maintain warning signs along pipelines conveying untreated groundwater that caution site visitors and workers of potential hazards from the 200-UP-1 Groundwater OU.	No findings, signs have been/will be installed along pipelines.
Miscellaneous Provision	In the event of any unauthorized access (e.g., trespassing), DOE shall report such incidents to the Benton County Sheriff's Office for investigation and evaluation of possible prosecution.	No findings, no unauthorized access to the site has occurred.

Explanation of Significant Differences (ESD) for the Interim Action Record of Decision for the 200-UP-1 Groundwater Operable Unit, Hanford Site, Benton County Washington.

<b>Institutional Controls Category</b>	<b>Institutional Controls Requirement</b>	<b>Sections of the Plan Where Institutional Controls are Addressed</b>
Land-Use Management	Activities that would disrupt or lessen the performance of the pump-and-treat component of the remedy are to be prohibited.	No findings, no activities have been implemented that would disrupt/lessen performance of the interim remedy.
Land-Use Management	The DOE shall prohibit activities that would damage the remedy components (e.g., extraction wells, piping, treatment plant, monitoring wells).	No findings, no activities have been implemented that would damage the remedy components.
Land -Use Management	The DOE will prevent the development and use of property above the 200-UP-1 Groundwater OU for residential housing, elementary and secondary schools, childcare facilities, and playgrounds.	No findings, no property development has taken place.
Miscellaneous Provision	The DOE shall report on the effectiveness of institutional controls for the 200-UP-1 Groundwater OU interim remedy in an annual report, or on an alternative reporting frequency specified by Ecology. Such reporting may be for the 200-UP-1 Groundwater OU alone or may be part of a Hanford site-wide report.	No findings.

Explanation of Significant Differences (ESD) for the Interim Action Record of Decision for the 200-UP-1 Groundwater Operable Unit, Hanford Site, Benton County Washington.

<b>Institutional Controls Category</b>	<b>Institutional Controls Requirement</b>	<b>Sections of the Plan Where Institutional Controls are Addressed</b>
Land-Use Management	Measures that are necessary to ensure continuation of institutional controls shall be taken before any lease or transfer of any land above the 200-UP-1 Groundwater OU. The DOE will provide notice to Ecology and EPA at least six months prior to any transfer or sale of 200-UP-1 Groundwater OU or any land above the 200-UP-1 Groundwater OU so that Ecology can be involved in discussions to ensure that appropriate provisions are included in the transfer terms or conveyance documents to maintain effective institutional controls. If it is not possible for DOE to notify Ecology and EPA at least six months prior to any transfer or sale, then the DOE will notify Ecology and EPA as soon as possible but no later than 60 days prior to the transfer or sale of any property subject to institutional controls. In addition to the land transfer notice and discussion provisions above, the DOE further agrees to provide Ecology and EPA with similar notice, within the same time frames, as to federal-to-federal transfer of property. The DOE shall provide a copy of executed deed or transfer assembly to Ecology and EPA.	No findings, no transfer/sale of land has taken place.
Land -Use Management	The institutional controls specified above shall be maintained until the concentrations of hazardous substances in groundwater are at such levels to allow for unrestricted use and exposure and Ecology authorizes the removal of restrictions. DOE is responsible for implementing, maintaining, reporting on and enforcing the institutional controls.	No findings, land use controls are still in place.

**Notes of Thursday, August 05, 2010, RL/EPA/Ecology/CHPRC Meeting on Use of a Hanford WIDS Waste Site Reclassification Form and a CERCLA NTCRA Response Action Report for RL-0040 Projects (Nuclear Facility D&D - Remainder of Hanford)  
(9:30 a.m. – 10:30 a.m., PDT, CR 554, Federal Building, Richland, Washington)**

**Attendees:** Representatives from RL, CHRPC, EPA, and Ecology (see attached list of attendees).

**Meeting Agenda (attached):** To discuss and reach mutual understanding of the WIDS Waste Site Reclassification Form transmittal and approval process, the CERCLA NTCRA Response Action Report content and its role, and entries into Administrative Record. This meeting also completes **Action No. 129 from the June 17, 2010, and July 15, 2010, 200 Area TPA PMMs.**

**Meeting Handouts (attached):**

- Meeting Purpose/Agenda
- EPA (Craig Cameron) Email (July 28, 2010)
- CERCLA NTCRA Process Flowchart (RL Internal Working Draft, August 05, 2010)\*
- CHPRC (Lee Tuott) Generic Example RAR Crosswalk (CHPRC Internal Working Draft, January 25, 2010)\*

\*These handouts were provided during the meeting for information and to facilitate discussion, and have no regulatory (EPA/Ecology) concurrence regarding their content.

**Discussion:**

- Overall, the EPA and Ecology did not take issue with RL's proposed use of a "Response Action Report" for a NTCRA, its contents, and the fact that the regulators do not sign the document. The Response Action Report is attached to a WIDS Form that is signed by the regulator.
- Metric of "done" for remediation/removals – EPA tracks completion of both CERCLA remedial actions and CERCLA NTCRAs. At EPA, typically the actions must be complete and the waste must be disposed of in order to claim performance.
- EPA discussed that they would like to have a comparison of the costs associated with a NTCRA compared to the original cost estimate in the EE/CA. CHPRC discussed that they had received direction from RL (10-AMCP-0151, June 02, 2010), clarifying that it was adequate to have cost estimates for inclusion in waste site closeout documentation (i.e., Remedial Action Reports/Response Action Reports, equivalent closeout document) based on current accounting methods, utilizing the freedom to add language that the costs included in a specific NTCRA Response Action Report are not considered audit quality data and are pro-rated utilizing an activity/schedule-based methodology. As a result, the comparison that EPA would really like to see would be in the final Remedial Action Report for an operable unit or other designation, i.e., geographic area.
- RAR usage – EPA uses the acronym "RAR" to mean a CERCLA "Remedial Action Report." Due to this common usage, EPA suggested that "Response Action Report" be spelled out (instead of abbreviated as a RAR) to eliminate confusion with EPA's RAR. There was a brief discussion of whether a different term could be applied to the individual completion reports but no action was taken.

**Notes of Thursday, August 05, 2010, RL/EPA/Ecology/CHPRC Meeting on Use of a Hanford WIDS Waste Site Reclassification Form and a CERCLA NTCRA Response Action Report for RL-0040 Projects (Nuclear Facility D&D - Remainder of Hanford)  
(9:30 a.m. – 10:30 a.m., PDT, CR 554, Federal Building, Richland, Washington)**

- RL and EPA need to meet soon to discuss what will need to be produced to meet EPA's two near-term commitments requiring development of approved remedial action reports in place by FY 2011 for the 100-BC-1 OU and the 200-CW-3 OU, the latter which includes waste sites in 200 North (Note: EPA noted that they still need to receive RSVPs to go with the WIDS forms for the soil sites in the 200 North because that is what the 100/200 Area Remaining Sites ROD requires).
- Even though the 212-N, P, R buildings and the railcars are not part of the 200-CW-3 OU remedial actions being completed per the 100/200 Area Remaining Sites ROD, EPA envisions that these removal activities will be described in the remedial action report to put things in the larger context of cleanup in the 200 North Area. EPA also acknowledged that their EPA Region 10 office will be working with their EPA HQs office in August 2010 to discuss EPA expectations for streamlining close-out documentation for CERCLA interim and final actions at Hanford. The EPA staff will coordinate with RL if changes to the process or outline/documentation are needed. (Note: Refer to EPA (Craig Cameron) July 28, 2010, Email handed out during the meeting and attached to these minutes).
- EPA and Ecology are OK with not signing the Response Action Report as it's an attachment to the WIDS Form. However, if there is something in the report that is not correct, is unclear, isn't supported by the data, and/or is related to a regulatory matter, RL can anticipate receiving comments on that item. Resolution would be expected prior to the WIDS Form being signed by the regulator. Also, Ecology acknowledged that their approval of a WIDS Form is essentially their approval of a Response Action Report since the latter is supporting documentation.
- Expediting WIDS Form review and approvals - The regulators prefer to be provided early versions (i.e., predecisional drafts to Rev. 0) of documents and attachments for review.
- The following are EPA review comments on the *Response Action Report for 212-N, 212-P, and 212-R Facilities Removal Action* (DOE/RL-2010-31, Rev. 0, May 2010):
  - Unclear why RL prepared a Response Action Report for the 212-N, 212-P, and 212-R removal activities prior to the final CERCLA remedial action being fully complete. RL responded that this is typically done to:
    - Obtain "approval" to be able to backfill or document what CERCLA NTCRA has been completed to date, or
    - To capture/document the information that has been completed to date that ultimately will be rolled up in a final CERCLA remedial action report.
  - Costs – EPA would like to see, in one place, the costs associated with a CERCLA removal action, a comparison to the original estimate, and an explanation of why there was a difference if it's significant. While there isn't a regulatory factor to have an explanation of difference for a removal activity, efficiencies in remediation are important to EPA. EPA noted that they have some questions on the costs provided in the predecisional Draft A Engineering Evaluation and Cost Analysis (EE/CA) Addendum to DOE/RL-2008-07, *212-N, -P, and -R Facilities Engineering*

**Notes of Thursday, August 05, 2010, RL/EPA/Ecology/CHPRC Meeting on Use of a Hanford WIDS Waste Site Reclassification Form and a CERCLA NTCRA Response Action Report for RL-0040 Projects (Nuclear Facility D&D - Remainder of Hanford)  
(9:30 a.m. – 10:30 a.m., PDT, CR 554, Federal Building, Richland, Washington)**

*Evaluation/Cost Analysis* for the 200 North Area railcars and would like to have a discussion with RL on contract efficiencies related to DOE's contract structure.

- References – The regulators feel that just citing a DOE document number for a reference isn't helpful. Rather, it's more beneficial to provide the name of the document such as the "XYZ Operable Unit RI/FS Report" when first cited.
- Land Use – EPA recommended using approved wording that has been previously agreed to by the Tri-Party Agreement Parties (i.e., RL, EPA, and Ecology) the when talking about land use.
- Section 5.4, Regulatory Oversight of the aforementioned Response Action Report for the 212-N, 212-P, and 212-R Facilities (DOE/RL-2010-31, Rev. 0, May 2010) – EPA feels that this section should describe how the Response Action Report isn't approved by the regulators, but is attached to support the WIDS Form. EPA also recommended that this Response Action Report (and future ones) reflect a disclaimer somewhere in the text in this regards. Note: RL to consider use of a transmittal letter, agreement in PMM minutes, document revision, or other mechanism is needed in regards to documents at EPA for approval.
- Schedule of documents being sent to agencies – The agencies identified the need to have advance notice of documents that will be coming their way for review to support their resource planning.

**Decisions/Actions:**

- RL to meet on a TBD date with EPA/Ecology and CHPRC to discuss what needs to be done to meet EPA's two near-term commitments requiring development of approved remedial action reports in place by FY 2011 for the 100-BC-1 OU and the 200-CW-3 OU, which includes 200 North waste sites. (Note: EPA noted that they still need to receive RSVPs to go with the WIDS forms for the soil sites in the 200 North because that is what the Remaining Sites ROD requires).
- RL to determine and communicate to the regulators, the mechanism for addressing the aforementioned EPA review comments on the *Response Action Report for 212-N, 212-P, and 212-R Facilities Removal Action* (DOE/RL-2010-31, Rev. 0, May 2010) as well as the document's transmittal to the regulators.
- For future CERCLA NTCRA Response Action Reports, RL will transmit in one correspondence to the regulators, the WIDS Forms for approval signature and RL's approved Response Action Report for backup information. Once the WIDS Forms have been signed by all parties, RL will enter the package [signed WIDS Form(s) and RL-approved Response Action Report] into the AR.
- RL will provide at a TBD date, a review schedule of documents to be sent to the regulators for review to facilitate the regulators' resource management and planning.

**Chapin, Douglas**

**Subject:** CERCLA NTCRA "Response Action Report (RAR) Meeting  
**Location:** CR 554, Federal Building, Richland, Washington

**Start:** Thu 8/5/2010 9:30 AM  
**End:** Thu 8/5/2010 10:30 AM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Chapin, Douglas H

**Required Attendees:** Chapin, Douglas H; Cameron, Craig (EPA); 'LOBOS.ROD@EPA.GOV'; 'NMEN461@ECY.WA.GOV'; Farabee, Oliver A; Louie, Catherine; Roddy, Francis M.; Woolery, Wade; Walker, Curtis B; Crane, Tina M; Cusack, Laura J; Tuott, Lee C; Clark, Cliff E.; Ceto, Nicholas

**Optional Attendees:** Brunke, Ronald C

List of Meeting Attendees

Al Farabee will be out of the office. However, I can go ahead with meeting. Cathy Louie, our Deputy FPD, will represent him.

The purpose of this meeting is to discuss the CERCLA NTCRA Response Action Report (RAR) for RL-0040 projects. Discussion topics will include, but not necessarily be limited to discussion of a WIDs form and RAR approval/concurrence, relative to RL's needs vs. regulator needs. The meeting also fulfills actions from the June 17, 2010, and July 15, 2010, 200 Area TPA PMM's.

Doug Chapin, RL-0040, 373-9396

<u>Name</u>	<u>Organization</u>	<u>Tel. No.</u>
Doug Chapin	DOE-RL-0040	373-9396
LEE Tuott	CHPRC DRS	376-1045
CURT WALKER	CHPRC Closure	373-2218
T.M. Crane	CHPRC Closure	376-9789
C. S. Louie	DOE-RL	376-6834
Wade Woolery	DOE-RL	372-2889
Craig Cameron	EPA	376-8665
Ron Brunke	CHPRC	376-2663
Frank Roddy	DOE	372-0945
NINA Menard	Ecology	372-7941

**August 05, 2010, RL/EPA/Ecology/CHPRC Meeting  
on WIDS Waste Site Reclassification Form and  
CERCLA NTCRA Response Action Report (RAR)  
(9:30 a.m. – 10:30 a.m., CR 554, Federal Building)**

Meeting Purpose/Agenda:

To discuss and reach mutual understanding of the WIDS Waste Site Reclassification Form transmittal and approval process, the RAR content and its role, and entries into AR. This meeting also completes an action from the June 17, 2010, and July 15, 2010, 200 Area TPA PMMs.

Agenda/Discussion:

- Introduction of attendees (Al Farabee and Cathy Louie were unavailable to attend)
- EPA (Craig Cameron) Emails (July 28, 2010)
- WIDS Waste Site Reclassification Form (WIDS Form)
  - Transmittal and approval
- RAR
  - Content
    - Example: 212-N/P/R RAR (DOE/RL-2010-31, Rev. 0, May 2010)
    - Cost estimates to be included (RL Ltr 10-AMCP-0151, June 02, 2010)
  - Location of WIDS Form
  - Transmittal
- Administrative Record (WIDS Form plus RAR)
  - RL places final package into AR
- Miscellaneous
- Decisions/Commitments
- Actions

Meeting Handouts:

- Meeting Purpose/Agenda
- EPA (Craig Cameron) Email (July 28, 2010)
- CERCLA NTCRA Process Flowchart (Working Document, August 05, 2010)
- CHPRC (Lee Tuott) Generic Example RAR Crosswalk (January 25, 2010)

**Chapin, Douglas H**

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**From:** Cameron.Craig@epamail.epa.gov  
**Sent:** Wednesday, July 28, 2010 1:48 PM  
**To:** Chapin, Douglas H; Roddy, Francis M.; Louie, Catherine; Woolery, Wade; Farabee, Oliver A  
**Cc:** Buelow.Laura@epamail.epa.gov; Bond, Rick; nmen461@ecy.wa.gov; Dagan, Ellen; Lobos.Rod@epamail.epa.gov; Gadbois.Larry@epamail.epa.gov; Faulk.Dennis@epamail.epa.gov  
**Subject:** Remedial Action Report

Hello,

We have been discussing close-out documentation regarding the 200 North Area waste sites and buildings as well as sites in the 100 K Area recently. The 200 North Area topic was triggered by the submittal of a "Response Action Report" for the removal action for the 212-N, P, R buildings into the administrative record. This new type of document and its unilateral placement in the administrative record was brought up at one of the 200 Area Project Managers meetings. Rod Lobos, Larry Gadbois and I met with Ellen Dagan and some K Area project people this morning and I suggest that the 200-CW-3 project folks speak with Ellen about the discussion.

At the meeting this morning I gave a brief overview of EPA's Superfund tracking system and requirements for remedial action completion on an operable unit basis. I indicated that EPA Region 10 is going to work with our headquarters in August to discuss expectations for close-out documentation for interim and final actions at Hanford. I also talked about two of our near-term commitments that require the development of remedial action reports. We have a commitment to have approved remedial action reports in place for the 100-BC-1 operable unit (Laura has informed the project of this need) and for the 200-CW-3 operable unit (includes waste sites in 200 North) in fiscal year 2011. Even though the 212-N, P, R buildings and the railcars are not part of the 200-CW-3 remedial action being completed per the 100/200 Area Remaining Sites ROD, I envision these removal activities will be described in the remedial action report to put things in the larger context of cleanup in the 200 North Area.

I appreciate the effort DOE is putting into tracking actual costs and in compiling cleanup verification information on both the remedial and the removal sides. I wish to continue discussing these issues with you so that we can all meet our requirements for close-out documentation.

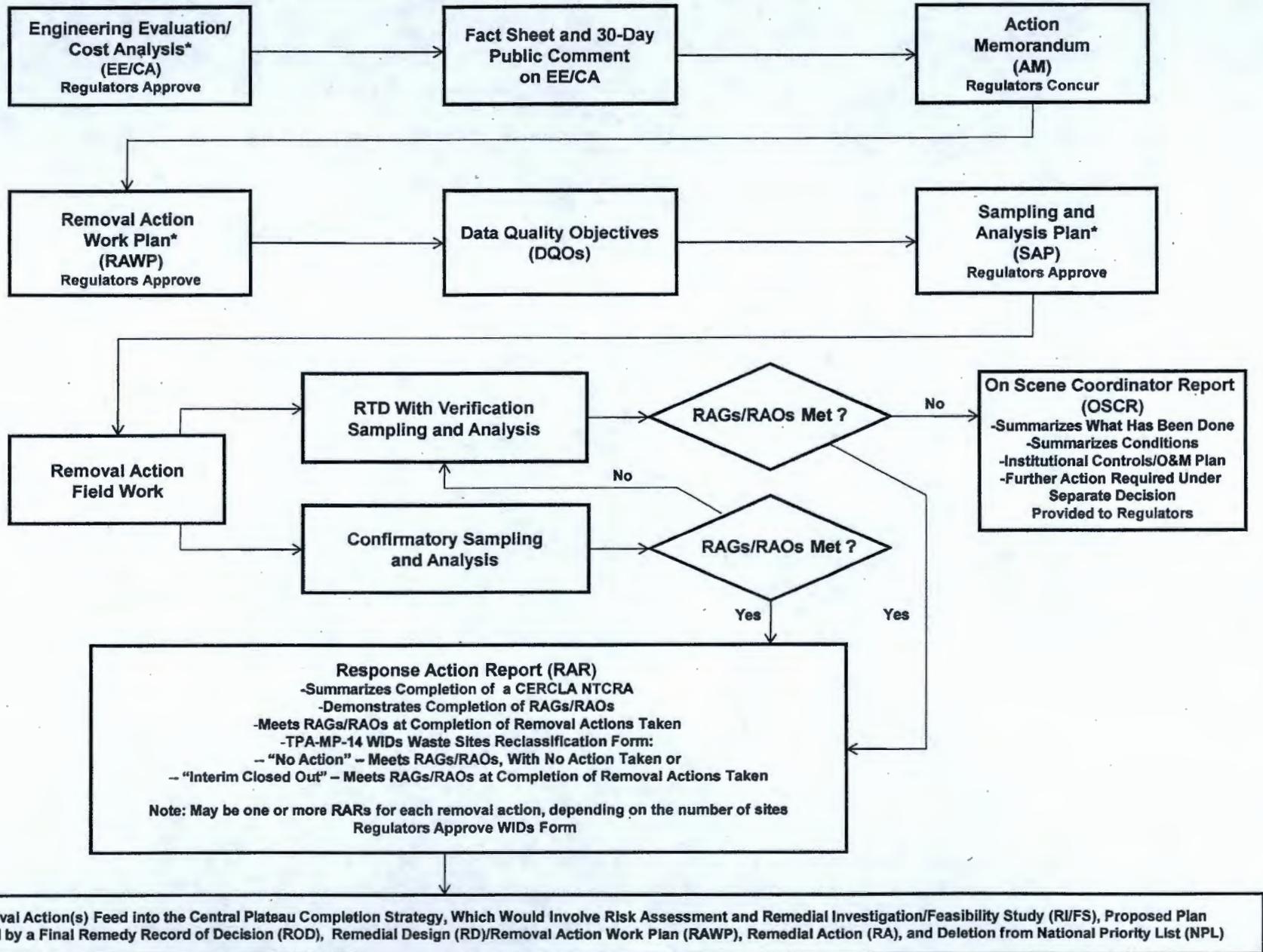
Please contact me with any questions or comments.

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# CERCLA Non-Time-Critical Removal Action (NTCRA) Process\*

(RL Internal Working Draft, August 05, 2010)

\* This was a handout provided during an August 05, 2010, WIDS-CERCLA Response Action Report Meeting held between DOE-RL, CHPRC, EPA, and Ecology. The handout was provided for information and to facilitate discussion, and has no regulatory (EPA/Ecology) concurrence regarding its content.



\* Considered a Primary Document Which Follows the TPA Section 9.2 Review/Comment Process

## Response Action Report (RAR) Crosswalk (CHPRC Internal Working Draft, Prepared January 25, 2010)\*

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CERCLA Site Completion Guidelines	Reference Section In:				
	RAR	CVP/ RSP	RACR	PCOR	FCOR
Overview of document purpose, content, and organization	1		1, 1.1	I, II	I, II
Introduction/description of OU type (clean closure, long-term (GW treatment, waste-in-place), Introduce the OU for which the RAR applies	1.1		1.1	II	II
Site location, size, environmental setting (incl. subsurface conditions, as appropriate); description and operational history and waste management practices that contributed to the contamination of the site	2	2.0	1.1	II	II
Regulatory and enforcement history at the site	1.2		1.1	II	II
Major findings and results of site investigation activities: RI/FS study results; ROD findings; COCs; remedies selected; date RA initiated, method used to implement RA (e.g., consent decree, contract, cooperative or other agreement)	1.2		1, 1.1, 1.2, 1.3	II	II
Prior removal and remedial (cleanup) activities; if applicable	1.2		1.1	II	II
ROD amendments, explanation of significant differences, or technical impracticability waivers	2.2		1.3		
Summary of RA Objectives & Goals: RAOs and RAGs	2.1.1		2.1, 2.2, Table 2-1		VII
Basis for determining the cleanup goals for the OU/DU, including planned future land use	2.1.1	1.0	2.2		
Remedial/Removal design, criteria and significant regulatory or technical considerations (during RD prep)	2		3.1		
Documentation of health and safety requirement compliance while implementing the RA; substantial problems or deviations	5, 6		3.2		
Construction Completion Status: Construction and Removal Activities and Schedule [required even for no-action remedies] - Activities and schedule for site completion			3.2, 4, 5.2, Table 5-5	IV	
Chronology/step-by-step summary of the activities undertaken to construct and implement the RA (e.g., major events for the OU; date ROD is signed, milestones, mobilization & site preparatory work; construction of the treatment system; associated site work, e.g. fencing, surface water collection and control; system operation and monitoring; and sampling activities)	4	4.0	3.2, 4, Table 4-1		

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CERCLA Site Completion Guidelines	Reference Section In:				
	RAR	CVP / RS	RACR	PCOR	FCOR
Date of pre-final inspection	4		4, 5	I/II	
Redevelopment potential at site; planned or ongoing redevelopment work			5.2	II	II
Site Completion Status			5	IV	
Activities and schedule for site completion - Identify activities remaining, to include assurance of consistency with the NCP (e.g., joint EPA / State inspection, operating properly and successfully determination); Assurance of effectiveness of the remedy; satisfaction of requirements for site completion; Organization responsibility for implementation			4.1, 5.1, 5.2, Table 5-2	IV	
Demonstration of Construction & Cleanup QA/QC - Technology performance overall in terms of comparison to cleanup goals <ul style="list-style-type: none"> <li>Approved construction quality assurance (QA) and quality control (QC) plan &amp; requirements; problems or deviations (QA/QC protocol followed)</li> </ul>	5		5.2.1, 6.3		III
Results of on-site inspections	5.4		5.2.1, Table 5-6		III
Documentation that remedy is operating properly and successfully, date achieved	6		5		
Sampling and analysis protocol followed	5	5.0, 7.0	6.3		III
Cleanup Verification/Data Evaluation (Verification of S/A data, data evaluation and results) - Refer to previous and/or document other relevant QA/QC, DQA information; Overall quality of the analytical data; QA/QC procedures followed; QAPP used; comparison of analytical data with DQOs	5	6.0	6.3		
Confirmation (Verification) Sampling for Attainment of Cleanup Objectives	5	3.0	6, Table 6-1		IV
Analysis of Protectiveness: Cleanup Verification/Data Evaluation - assurance that protectiveness is attained.	5	3.0	6		VII
Evaluation of RAGs attainment - all pathways: direct exposure, soil levels protective of GW, GW & Surface water RAGs attained, WAC 171-340 3-part test for non radionuclide's, ecological risk evaluation	5	3.0	Table 6-1		VII
Summary of Operation and Maintenance Plan & Activities - description of required O&M, general activities for post-construction O&M (monitoring, site maintenance) and potential problems or concerns with such activities; assurance that O&M plans are in place and sufficient to maintain protectiveness of the remedy;	7		7.1, 7.2	II	V

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CERCLA Site Completion Guidelines	Reference Section In:				
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assurance that ICs are in place; assurance that O&M activities will be performed by the State or responsible party					
Future ground water or surface water restoration activities to meet cleanup goals			7.1	IV	
Details of institutional controls (type, logistics)		1.0	7.2	II	V
State whether a five-year review is required, what type of review is required (statutory or policy), and when scheduled			7.3		VIII
Summary of costs including current capital and annual O&M costs: Actual final (or estimated) costs and applicable year for the project, costs previously estimated in the ROD	8		8, Table 8-1	V	VI
Treatment Remedies – calculate unit costs based on the sum of the actual RA capital and RA operating costs	8		8		
Total response action construction cost (i.e., capital costs) at time of Site Closure documentation	8		Table 8-1	V	VI
Refer reader to Appendix A for a detailed breakdown of RA and O&M costs	8		8		VI
Community involvement activities performed			9		II
Site-specific observations and lessons learned; successes and problems encountered and how resolved	9		10		
Operable Unit/Decision Unit Contact Information: Names, addresses, and phone numbers, for the major design and remediation contractors, EPA oversight contractors, and the respective RPM and project managers for EPA, the State, and the PRPs, as applicable	10		11		

\*Compared requirement from WCH Remedial Action Report for 100-FR-2 (DOE/RL-2009-63) as Verified by WCH.

\*\*Compared requirement from redline of Rev. 5 of DOE/RL-96-17, RDR/RAWP for the 100 Area, which is expected to be accepted as Rev. 6.