

MEETING NOTES
Waste Management Area A-AX:
Data Quality Objectives Step 4, Define the Boundaries of the Study

MEETING DATE: September 1, 2020

LOCATION: Microsoft Teams Meeting

ATTENDEES:

Jim Alzheimer (Ecology)	Tabitha Liebrecht (Ecology)	Kim Schuyler (Freestone)
Kate Amrhein (DOE-RL)	Rod Lobos (DOE-ORP)	Marysia Skorska (Ecology)
Becky Blackwell (DOE-ORP)	Scott Luke (WRPS)	Dave St. John (CHPRC)
Craig Cameron (EPA)	Jeff Lyon (Ecology)	Cindy Tabor (WRPS)
Damon Delistraty (Ecology)	Nina Menard (Ecology)	Robin Varljen (WRPS)
Dib Goswami (Ecology)	Julie Robertson (Freestone)	Kim Welsch (Ecology)
Doug Hildebrand (DOE-RL)	Beth Rochette (Ecology)	Jerry Yokel (Ecology)
Deanna Klages (WRPS)	Kyle Rucker (Ecology)	

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

This meeting was called to provide the agencies that participated in the WMA A-AX DQO process an opportunity to discuss Step 4 of the DQO process, Define the Boundaries of the Study.

2.0 BACKGROUND

The overall WMA A-AX soil investigation boundary was left undefined by the DQO Report. The report instead deferred to a “focus area” approach to allow portions of the soil investigation to proceed until the overall WMA boundary could be defined. Further discussion is required to support formal definition of the overall boundary.

Cindy Tabor stated that the goal of the meeting was to walk through information associated with the agenda. She identified that the desired outcome of the meeting was as follows:

- To evaluate and get preliminary approval to move forward with segmentation of waste site 200-E-131, and
- To define the boundary of the WMA A-AX *Resource Conservation and Recovery Act* (RCRA) facility investigation (RFI) soil sampling effort.

Ms. Tabor stated that the next step would be to prepare the segmentation paperwork for review, so there will be a subsequent opportunity to evaluate the proposal in detail.

Ms. Tabor reviewed a few key points in the history of the development of the WMA A-AX DQO, referring to the following three documents:

- RPP-RPT-60227, Revision 1, *Data Quality Objectives for Vadose Zone Characterization at Waste Management Area A-AX*
- RPP-PLAN-62041, Revision 0, *Sampling and Analysis Plan for WMA A-AX Focus Area 1 (Tanks 241-A-104 and 241-A-105)*
- RPP-PLAN-36020, Revision 1, *Sampling and Analysis Plan for WMA A-AX Focus Area 2 (Southwestern Area of A Farm)*.

Kim Welsch asked whether Ecology was involved in the WMA A-AX DQO process, and Ms. Tabor confirmed they were. Ms. Tabor noted that during the development of the DQO Report, Rev. 0, the DQO participants agreed to defer defining the overall boundary of WMA A-AX for the purpose of the soil investigation. Instead, the DQO participants implemented a “focus area” approach to characterization, whereby specific areas of concern could be investigated. Revision 0 of the DQO Report supports the Focus Area 1 investigation, which addresses impacts due to leaks from tanks 241-A-104 and 241-A-105. Revision 1 of the DQO Report supports the Focus Area 2 investigation, which addresses whether well corrosion in the area southwest of the 241-A tanks was associated with tank leaks.

Ms. Tabor stated that Focus Area 1 sampling was completed last year, and that Focus Area 2 sampling is in progress but delayed by issues related to the Covid pandemic.

Ms. Tabor presented Table 1-1 from Revision 1 of the DQO Report (Attachment 1), noting that DQO Steps 1, 2, 3, 5, and 6 were defined as part of past DQO development activities. She stated that Step 4 was the subject of this meeting, and Step 7 will be the subject of a meeting scheduled for September 29, 2020.

3.0 BOUNDARY DISCUSSION

Recommendation

Ms. Tabor presented a graphic illustrating the recommended boundary for the WMA A-AX RFI soil sampling effort (Attachment 2). The recommended boundary matched that used in WA7890008967, DRAFT *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste*, Revision 9, for the 241-A and 241-AX Tank Farms (also known as A Farm and AX Farm). Ms. Tabor stated that the recommended boundary for the WMA A-AX RFI soil investigation also includes the soil at the 241-A-302B Catch Tank in recognition of *Hanford Federal Facility Agreement and Consent Order* (the Tri-Party Agreement, or TPA) Change Control Form C-14-01 (July 2014). This change control form deleted the 241-A-302B Catch Tank from the 200-IS-1 Operable Unit (OU) “because it is within the A-AX WMA and will be closed out as part of that WMA.”

Ms. Tabor reviewed the various sources of information that were evaluated during the development of the recommendation. These included the following documents:

- TPA Action Plan Appendix B: Listing of Treatment, Storage, and Disposal Groups/Units
- TPA Action Plan Appendix C: Prioritized Listing of Operable Units
- Relevant TPA change notices
- The Hanford Site Waste Information Data System (WIDS) and the associated *Hanford Site Waste Management Units Report* (DOE/RL-88-30), which is updated annually per TPA Action Plan Section 3.5
- OU scoping documents (*200-IS-1 Operable Unit Scoping* – SGW-59881; *200-EA-1 Operable Unit Scoping* – SGW-60540)
- Available copies of OU work plans
- Revision 8c and Draft Revision 9 of the Hanford Facility RCRA Permit
- Appendices of the current DOE prime contracts addressing contractor responsibilities.

Based on the reviewed information, Ms. Tabor recommended that the WMA A-AX RFI soil investigation boundary be defined as the area identified as the 241-A Tank Farm and the 241-AX Tank Farm in the Hanford Facility RCRA Permit plus the soil at the 241-A-302B Catch Tank.

200-E-131

Ms. Tabor introduced the discussion about waste site 200-E-131, which is a contaminated soil waste site, and the 2607-ED Tile Field. Julie Robertson presented a graphic illustrating the boundary of 200-E-131 (Attachment 3). The graphic also illustrated the locations of the 2607-ED Tile Field and the 244-AR Vault. Ms. Tabor stated that waste site 200-E-131 is not in the TPA. She also stated that 200-E-131 and 2607-ED were assigned to WMA A-AX in WIDS, even though 200-E-131 encompasses double shell tank farms and areas outside the A Farm and AX Farm fencelines, and the 2607-ED Tile Field is well outside the east fenceline of the A Farms. Mr. Welsch noted that neither 200-E-131 nor 2607-ED are identified in TPA Appendix C as being assigned to any OU. Ms. Tabor stated that the portion of 200-E-131 shaded orange in Attachment 3 was the same area identified as 241-A Tank Farm and 241-AX Tank Farm in the Hanford Facility RCRA Permit, and she repeated the recommendation that the boundary of the WMA A-AX RFI soil investigation be identified as the soil within the A Farm and AX Farm fencelines and the 241-A-302B Catch Tank.

Mr. Welsch asked whether the boundary of the future WMA A-AX cover has been defined and was told that it had not. Mr. Welsch asked the DOE representatives who is responsible for the area outside the tank farm fence. Doug Hildebrand stated his belief that the tank farm embankment should be addressed by tank farm projects, because OU work cannot occur on the embankment without disturbing the tank farms, but that areas beyond the embankment should be addressed by OUs. The attendees discussed that the 241-A-302B Catch Tank is on the embankment, very close to the tank farm fenceline.

Mr. Hildebrand stated that ultimately “DOE” is responsible for all the areas being discussed, regardless of project. Mr. Welsch asked about the area west of the A Farms where the 244-AR Vault is. Ms. Tabor stated that the goal of the meeting was to define the boundary for the WMA A-AX RFI soil investigation, exclusive of structures, and noted that discussion about the 244-AR Vault was on the agenda for later in the meeting. Ms. Tabor stated that at WMA A-AX, no cover has been defined, and that in the longer term it is possible that a large cover might be constructed over a much bigger area (possibly extending over WMA C).

Ms. Robertson returned to the graphic (Attachment 3) illustrating waste site 200-E-131, which was created in 2001 to encompass all known soil contamination inside and adjacent to the 241-A, AN, AX, AY, and AZ Tank Farms (A Farms). Ms. Robertson noted the locations of the single and double shell tank farms within 200-E-131 and stated that waste site 200-E-131 was a consolidated soil contamination site encompassing six distinctly numbered unplanned releases that predated the acceptance (establishment) of 200-E-131, as well as several unnumbered spills and releases within and adjacent to the A Farms. Ms. Robertson stated that the written description of 200-E-131 also referred to the distinctly numbered unplanned release site UPR-200-E-18. This site was not consolidated into 200-E-131. This site is associated with a leak from a vent pipe at the 200-E-285 Sample Pit and is assigned to the 200-IS-1 OU per TPA Action Plan Appendix C.

Ms. Robertson stated that the graphic in Attachment 3 divides 200-E-131 into three segments because the soil investigations and cleanup decisions for the different segments will be determined through different pathways. The green segment will be addressed through documentation addressing the double shell tanks, the orange segment will be addressed in WMA A-AX documents, and the purple segment will be addressed predominantly by OUs. Ms. Robertson recommended that the agencies agree to segment 200-E-131 according to the decision document that will address each segment, and establish the WMA A-AX RFI soil sampling boundary as the area within the orange segment plus soil at the 241-A-302B Catch Tank.

Ms. Robertson stated that if the agencies agree to proceed with the proposed segmentation of 200-E-131, DOE would establish the segments in WIDS, then complete discovery checklists and reclassification forms for each segment. The agencies would need to review and approve of those forms in order to finalize the segmentation process. Changes to TPA Action Plan Appendix C would then be made as necessary.

Beth Rochette asked where UPR-200-E-18 would be assigned, and Ms. Robertson said that it would remain with the 200-IS-1 OU. In response to another question from Dr. Rochette, Ms. Robertson stated that detailed information about the six subsites consolidated into 200-E-131 still appears in WIDS, but the official classification of the original (separate) sites has been changed to “rejected” because they now also appear under the consolidated entry for accepted site 200-E-131. Ms. Robertson stated that the WIDS information would not be deleted from WIDS if 200-E-131 were segmented.

Marysia Skorska asked whether DOE intends to conduct soil sampling at the 241-A-302B Catch Tank, and Ms. Tabor stated that a well (informally known as PW-2) will be installed soon near the catch tank, and that DOE-RL and DOE-ORP are coordinating to take vadose zone samples to support the WMA A-AX RFI soil investigation near the catch tank.

The Ecology participants asked several questions seeking to understand why WMA A-AX should not address all three segments of 200-E-131. Ecology was particularly concerned about the proposal to

address the area outside the fenceline (shown in purple) separately from WMA A-AX. Mr. Welsch suggested transferring UPR-200-E-18 and 200-E-285 from the 200-IS-1 OU to WMA A-AX. Ms. Tabor noted that regardless of segmentation, all the contaminated soil in the area is the responsibility of DOE, and DOE's desire was to identify a logical and manageable approach to addressing all the locations. Mr. Hildebrand stated that numerous pipelines not shown in Attachment 3 are located in the purple segment and are assigned to the 200-IS-1 OU. Kim Schuyler presented a graphic showing the additional structures in the purple segment, including pipelines and trailers (Attachment 4).

Jeff Lyon asked whether the area south of A Farm by the 242-A Evaporator is paved. Mr. Hildebrand stated that the area is partially paved. Mr. Lyon asked whether DOE should consider sampling double shell tank farm soils between 241-AY-102 and 241-A-104 as a part of WMA A-AX, in case a decision is made to build an interim barrier over WMA A-AX that crosses those double shell tank area soils. Mr. Hildebrand stated that DOE has a need to focus the WMA A-AX sampling effort and that it might be best to defer sampling in that area until after the 241-AY tanks are emptied. Mr. Lyon expressed a concern that the remedy selected for WMA A-AX might be limited by the scope of the soil investigation and asked about sampling additional area beyond the WMA A-AX fenceline that is no longer necessary to support operations but may be contaminated. Mr. Welsch stated an expectation that DOE will construct an interim barrier over WMA A-AX and that DOE should expand the soil investigation area to support barrier construction over additional landscape. Ms. Skorska stated that the 241-AY tanks are scheduled to be cleaned out much later than the WMA A-AX RFI sampling effort, and that future efforts to clean out 241-AY tanks could potentially result in releases to the soil. Thus, even if the area around the 241-AY tanks is sampled with WMA A-AX, the area might have to be sampled again after 241-AY tank retrievals are complete.

Mr. Welsch asked whether DOE could define a part of the purple segment to be kept with WMA A-AX, noting that remediation of the 241-A-302B Catch Tank is likely to affect the area from the catch tank back to the A Farm fenceline. Ms. Tabor noted that there is no simple dividing line to use for establishing the WMA A-AX soil investigation boundary and that the agencies will have to come to an agreement. She stated that CHPRC is installing the PW-2 well near the 241-A-302B Catch Tank, and CHPRC is responsible for groundwater monitoring. Ms. Skorska asked if the well is a groundwater monitoring well, and Ms. Tabor answered that it is. Mr. Lyon asked if the data from soil samples taken during installation of the well would be included in the WMA A-AX RFI report, and Ms. Tabor said that they would.

Mr. Welsch asked whether the driver behind the proposal to segment 200-E-131 was in part related to the timing of the sampling effort. Ms. Robertson said that the green segment associated with the double shell tanks will be sampled much later than the orange segment associated with WMA A-AX, and that the timing for sampling the purple segment will be determined by the schedule for the OUs. Mr. Hildebrand clarified that the investigation associated with the 200-IS-1 OU will begin after the 200-EA-1 OU investigation is completed, and he reminded the participants that the purple segment is traversed by numerous pipelines that will be addressed by the 200-IS-1 OU. Mr. Lobos reiterated that the agencies need to develop a clear description of the scope of the WMA A-AX RFI soil sampling effort that can be easily explained. Mr. Lyon asked why the purple segment couldn't be included with WMA A-AX, and Ms. Tabor indicated that it would be difficult to explain clearly why the WMA A-AX effort stopped at that arbitrary eastern boundary of the purple segment. Mr. Lobos pointed out that it would be very odd to keep the purple segment with WMA A-AX but exclude a donut hole around UPR-200-E-18. Scott Luke asked which project would address the soil at the fenceline between the

single shell farms and double shell farms, and Ms. Robertson said that was a level of detail that would need to be addressed as the 200-E-131 segments are defined.

Mr. Lyon asked when comprehensive sampling of the purple segment would occur under 200-IS-1 OU. Mr. Hildebrand said that sampling effort is years away. Mr. Lobos added that sampling of the green segment is decades away as defined in TPA milestones. Mr. Lyon stated his impression that DOE would like to focus the WMA A-AX soil sampling effort on the single shell tanks and asked whether DOE believes that adjacent features will have minimal impact on the design of a barrier for WMA A-AX. Mr. Hildebrand stated that was correct. Mr. Lyon asked whether DOE believes information about adjacent features is not needed to make a corrective measures decision for WMA A-AX, and Mr. Lobos stated that was correct.

Jerry Yokel asked about the DOE Order 435.1 performance assessment for WMA A-AX and the 100-meter point of compliance calculation. Ms. Tabor responded that she is coordinating with individuals responsible for preparing the performance assessment documentation, and that details are still being worked through.

Ms. Tabor noted that the meeting was running long and that the agenda contained a few more discussion points, and she suggested that further discussion of 200-E-131 segmentation be tabled.

2607-ED

Ms. Robertson referred to the graphic in Attachment 3 showing the locations of the 2607-ED Septic Tank just inside the southeast fenceline of the 241-AX Tank Farm and the associated tile field east of the farm and well outside the fenceline. Ms. Robertson noted that the 200-EA-1 OU encompasses numerous septic systems and recommended that the 2607-ED Tile Field be addressed by an OU instead of WMA A-AX. Nina Menard asked whether there is a pipeline from the tile field to the tank; Ms. Robertson stated that she did not know. Ms. Menard asked DOE whether it was proposing to address the 2607-ED Septic Tank with WMA A-AX and the 2607-ED Tile Field with an OU, and Mr. Hildebrand said, "Yes."

4.0 244-AR VAULT

Ms. Tabor stated that this item was added to the meeting agenda at Ecology's request. Mr. Welsch asked why DOE is not proposing to include the 244-AR Vault in the WMA A-AX effort. Ms. Tabor stated that extensive research had been completed before the meeting. She shared the text of TPA Milestone M-037-24 regarding coordinated closure of inactive single shell tank system components outside WMAs.

DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 241-CX Tank System (CX-70, CX-71, and CX-72) and Inactive SST Components outside the WMAs. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-IS-1 OU.

The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)-(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any

of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix).

Ms. Tabor stated that Appendix C of the TPA Action Plan assigns the 244-AR Vault to the 200-IS-1 OU and acknowledged that while the closure of the vault will need to be coordinated, the soil investigation at the vault will not occur with WMA A-AX. Mr. Welsch and Ms. Menard said that Ecology did not intend for M-037-24 to be applied to tanks, that the vault contains tanks that are identified in the single shell tank portion of the Hanford Facility RCRA Permit, and that the vault should be addressed with the single shell tanks and not as part of the 200-IS-1 OU. Ms. Robertson stated that the vault is identified as being part of the 200-IS-1 OU in *200-IS-1 Operable Unit Scoping* (SGW-59881). Ms. Schuyler reviewed additional information regarding the status of the 244-AR Vault including the following.

- TPA Action Plan Appendix B identifies the 244-AR Vault as being part of the DST portion of the Hanford Facility RCRA Permit.
- The draft single shell tank portion of the Hanford Facility RCRA Permit identifies the 244-AR Vault as part of the single shell tank system.
- TPA Action Plan Appendix C assigns the 244-AR Vault to the 200-IS-1 OU and marks the vault with a double asterisk footnote indicating that RCRA closure and permitting is to be coordinated with OU activities.
- TPA Change Control Form C-13-01, signed in June 2013, added the 244-AR Vault to the 200-IS-1 OU.

Mr. Welsch and Ms. Menard stated that Ecology would need to discuss the 244-AR Vault internally and asked that DOE provide relevant information to support the discussion. Three actions were identified:

- **ACTION: Provide Ecology with the following:**
 - **Information about the 244-AR Vault**
 - **A copy of the information shown by Ms. Robertson regarding segmentation of 200-E-131**
 - **A copy of the graphic shown by Ms. Schuyler showing structures in the purple segment of 200-E-131**
- **ACTION: Following provision of the above information, Ecology meet internally to discuss the following:**
 - **Segmentation of waste site 200-E-131**
 - **Exclusion of the 2607-ED Tile Field from the WMA A-AX investigation**
 - **Closure of the 244-AR Vault**
 - **Definition of the WMA A-AX RFI soil investigation boundary.**

- **ACTION: Schedule follow-on meeting between the agencies to discuss the boundary to be addressed in Step 4 of the WMA A-AX soil DQO.**

Mr. Lobos reiterated DOE’s underlying goal of establishing a clear, cohesive description of the area to be investigated as a part of the WMA A-AX RFI soil investigation.

5.0 ACTIONS AND AGREEMENTS

No new agreements were reached.

Ms. Robertson reviewed the status of actions that remained open as of the March 5, 2019, WMA A-AX Briefing on Focus Area 2 and Field Updates on Focus Area 1. A summary of this information is provided in Table 1 below. Table 1 also incorporates new actions recorded at this meeting as noted above. Mr. Lyon suggested that DOE and Ecology jointly take one additional action. **ACTION: Address WMA A-AX corrective measure study definitions as they relate to resolution of Action 2017-08-31-08.**

6.0 NEXT MEETING

The next meeting was scheduled for September 29, 2020, 12:00 noon to 1:30 pm.

Table 1. Actions (3 pages)			
Action Number	Actionee	Description	9/1/2020 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.	Open. Preparing for a future meeting to discuss potential additional sampling.
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. See related Action 2017-08-07-09.	Open. See related Action 2017-08-07-09.
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.	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.

Table 1. Actions (3 pages)			
Action Number	Actionee	Description	9/1/2020 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.
2019-03-05-02	Barnes	Review the proposed Focus Area 2 characterization locations and provide feedback.	Closed. Barnes sent email 4/5/19 documenting approval of proposed locations in Rev. 0 of Focus Area 2 SAP (RPP-PLAN-63020). Location of large diameter borehole was subsequently impacted by construction. Added footnote to Figure 1-1 of the Rev. 1 SAP which states "The location of the large diameter hole (D0012) will be finalized after construction in the area is completed (anticipated September 2021)."
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.
2019-03-05-04	Tabor	During the development of the Focus Area 2 SAP, research whether to modify the tiered approach based on work at Oak Ridge and Savannah River.	Closed. Research completed; no change needed to tiered approach per communications with Truex.
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.	Open. Related to actions 2017-04-13-02 and 2017-08-07-09.
2019-03-05-06	Barnes	Provide information on the disposal of TBP to the 216-A-2 Crib.	Closed. Barnes provided email dated July 23, 2020 closing this action. Barnes previously provided this information in an email on August 16, 2017.

Table 1. Actions (3 pages)

Action Number	Actionee	Description	9/1/2020 Status
2020-09-01-01	Tabor	Send the following information to ECY (Lyon, Menard, Welsch): <ul style="list-style-type: none"> • 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. 	New.
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: <ul style="list-style-type: none"> • 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. 	New.
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.	New.
2020-09-01-04	Lobos/Lyon	Address CMS scope definitions	New.

Rodrigo Lobos
DOE Project Manager (print)

Rodrigo Lobos

DOE Project Manager (signature)

10-14-2020
Date

Jeffery J Lyon
Ecology Project Manager (print)

Ecology Project Manager (signature)

11-13-20
Date

Attachment 1

RPP-RPT-60227, Revision 1, Table 1-1. WMA A-AX DQO Approach

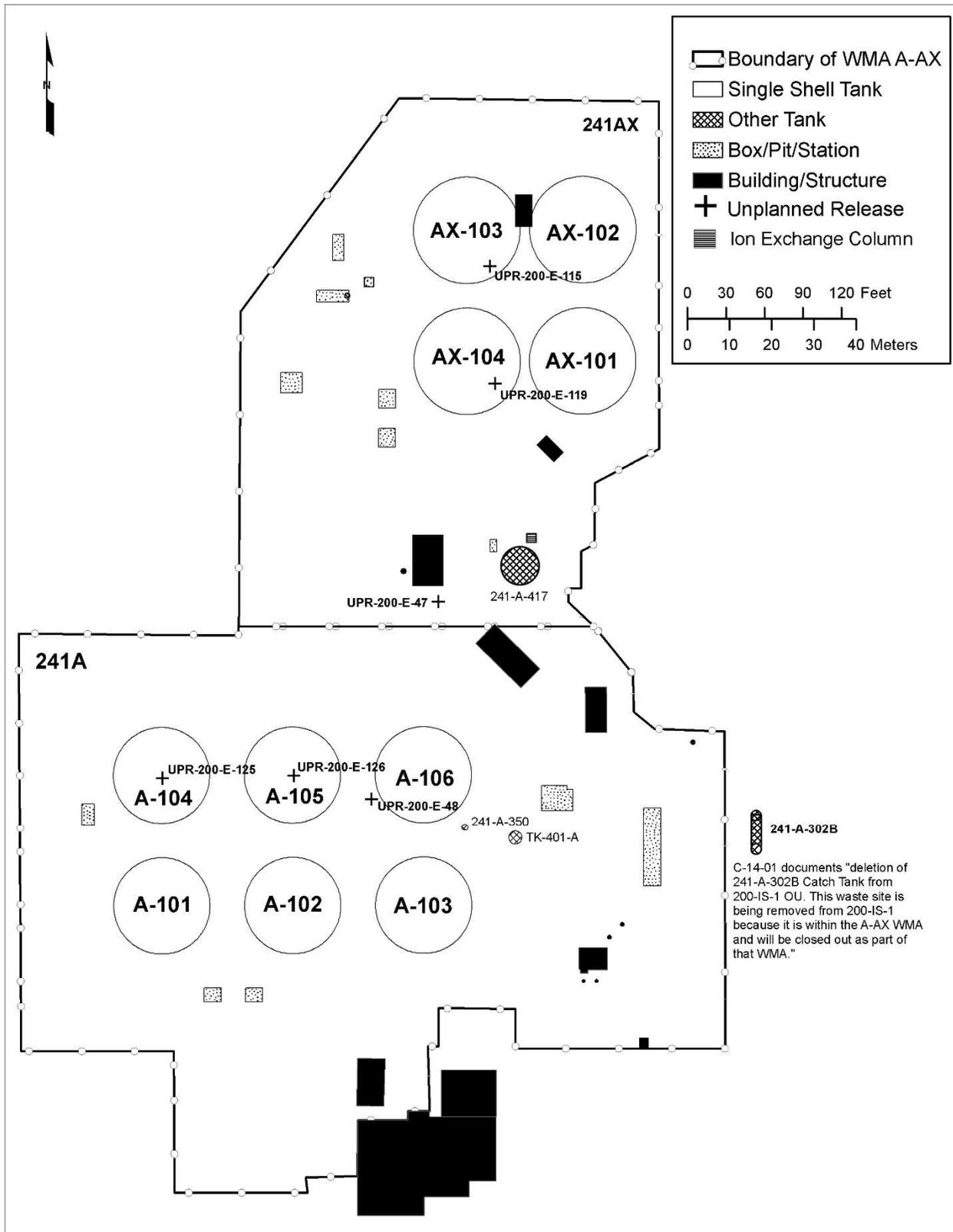
Table 1-1. WMA A-AX DQO Approach

Step	Purpose of Step	WMA A-AX DQO Document Information
1	State the Problem <i>Define the problem that necessitates the study, identify the planning team, examine budget, and schedule.</i>	Defined: The problem statement will be the same for each revision of the DQO. It will address the overall issue of collecting WMA A-AX data to support the IPA, risk-informed retrieval process, and RFI/CMS.
2	Identify the Goal of the Study <i>State how environmental data will be used in meeting objectives and solving the problem, identify study questions, define alternative outcomes.</i>	Defined: The goal of the study will be the same for each revision of the DQO. It will address the overall issue of collecting WMA A-AX data to support the IPA, risk-informed retrieval process, and RFI/CMS.
3	Identify Information Inputs <i>Identify data and information needed to answer study questions.</i>	Defined: The information inputs will be the same for each revision of the DQO. It will address the overall issue of collecting WMA A-AX data to support the IPA, risk-informed retrieval process, and RFI/CMS.
4	Define the Boundaries of the Study <i>Specify the target population and characteristics of interest, define spatial and temporal limits, scale of inference.</i>	To be defined for WMA A-AX (September 1, 2020 Meeting). Each revision will be specific to a focus area.
5	Develop the Analytical Approach <i>Define the parameter of interest, specify the type of inference, and develop the logic for drawing conclusions and findings.</i>	Defined: The analytical approach will be the same for each revision of the DQO. It will address the overall issue of collecting WMA A-AX data to support the IPA, risk-informed retrieval process, and RFI/CMS.
6	Specify Performance or Acceptance Criteria <i>Specify probability limits for false acceptance decision errors.</i>	Defined: Performance/Acceptance Criteria will be the same for each revision of the DQO. It will address the overall issue of collecting WMA A-AX data to support the IPA, risk-informed retrieval process, and RFI/CMS.
7	Develop the Plan for Obtaining Data <i>Select the resource-effective sampling and analysis plan that meets the performance criteria</i>	To be defined (future meeting). Each revision will be specific to a focus area.

Attachment 2

Recommended WMA A-AX Soil Investigation Boundary

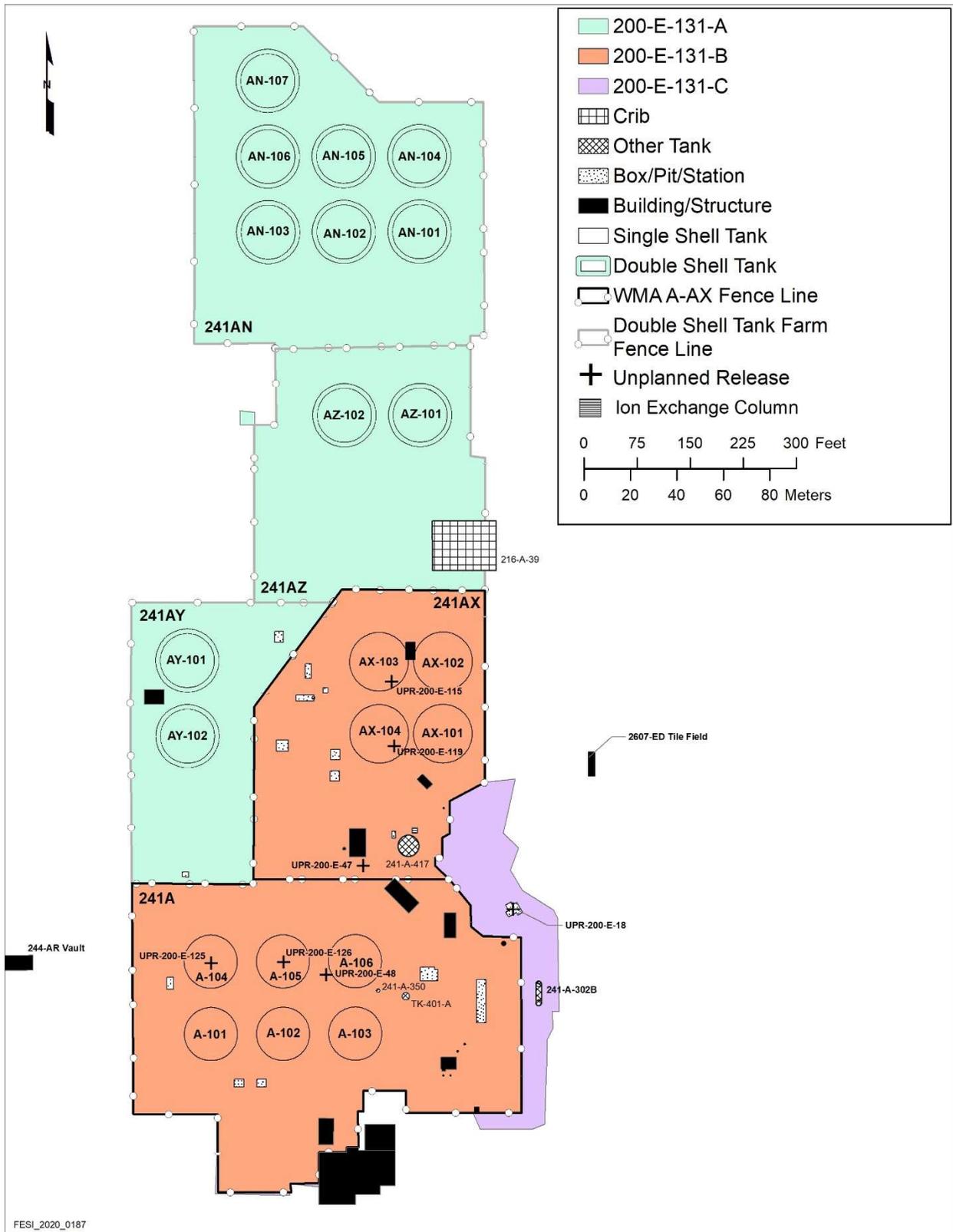
Recommended WMA A-AX Soil Investigation Boundary



Attachment 3

**Boundary of Consolidated Waste Site 200-E-131
(2 pages)**

Boundary of Consolidated Waste Site 200-E-131



FESI_2020_0187

200-E-131

200-E-131 Background:

- 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.

- Numbered waste sites consolidated into 200-E-131:
 - UPR-200-E-47
 - UPR-200-E-48
 - UPR-200-E-115
 - UPR-200-E-119
 - UPR-200-E-125
 - UPR-200-E-126

- Additional contaminated soil locations in 200-E-131:
 - UPR-200-E-18: Physically within the existing boundary of 200-E-131 but not consolidated into 200-E-131. It is soil contamination associated with a leak from a vent pipe at the 200-E-285 Sample Pit and will be addressed as part of 200-IS-1 OU per HFFACO Action Plan Appendix C.
 - Miscellaneous soil contamination inside and adjacent to the 241-A, AN, AX, AY, and AZ Tank Farms.

Soil investigation and cleanup decisions will be determined through different pathways:

- SST closure/WMA A-AX
- DST closure
- Operable Unit remediation (e.g., 200-IS-1 OU)

Proposal: Segment 200-E-131 according to the relevant decision documents:

- 200-E-131-A = DST-related documentation (green area)
- 200-E-131-B = SST-related documentation (orange area)
- 200-E-131-C = OU-related documentation (purple area)

Actions:

- Agree to proceed with segmentation of 200-E-131.
- Complete discovery checklists and reclassification forms, as needed, after subsites are created in WIDS.
- Complete Change Request to modify Appendix C if necessary.

Attachment 4

Structures in Purple Segment of Waste Site 200-E-131

Structures in in Purple Segment of Waste Site 200-E-131

