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January 22, 1990

Meeting Minutes
Special Topic: Work Plan Integration
ETC-2, Room 24, Richland Washington
January 18, 1990

From: J. J. Broderick

To: Distribution:

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J. Patterson, WHC
S. Weiss, WHC
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D. Lacombe, PRC

Administrative Record File (100-HR-1, 100-HR-3, 100-DR-1, 100-BC-5, 100-BC-5, 300-FF-1, 300-FF-5) [Care of Susan Wray, WHC]

The subject of integration of the source and groundwater RFI/CMS efforts has been discussed at each of the 100-HR-1/100-HR-3 Unit Managers Meetings. The purpose of this Special Topics meeting was to discuss, in depth, the proposal of Ecology and EPA in developing integrated work plans and general concepts for streamlining the RI/FS process.

Attachment 1 is a meeting summary including action items. Attachment 2 provides the attendance list. Attachment 3 is the January 17, 1990 letter from Larry Goldstein, Ecology, to John Broderick, USDOE, "Ecology/EPA Position Paper on Operable Unit Work Plan Integration".



Attachment 1

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Meeting Summary

1. A draft position paper (Attachment 3) on the integration of source and groundwater operable unit work plans was handed out to meeting attendees by Larry Goldstein, Ecology. The paper provides an outline of methods and suggestions for accomplishing program integration at a level acceptable to the regulatory agencies. Time was allowed at the beginning of the meeting for attendees to read the paper.
2. Some discussion was given to the "Lessons Learned" paper prepared by the General Support Services Contractor for DOE. Ecology was encouraged by the effort which will make the presentation of work plans more complete and compatible although they noted that they were not in total agreement with all of the suggestions found in the paper. Formal comments from EPA and Ecology will be forwarded to DOE when review is completed. There was general agreement that a full guidance document would be very useful in preparing operable unit work plans. DOE suggested that both EPA and Ecology should have input to the preparation of such a guidance document. DOE proposed that a team be formed to write the document.

Action # ST5.1: DOE will take the lead in initiating an effort to prepare a comprehensive guidance document for preparation of operable unit work plans. Action: Bob Stewart

3. A major point of discussion was the appropriateness of the current operable unit boundaries. At the time that the operable units were first developed, the boundaries were based on the best available information. Experience gained in developing work plans indicates that it might be desirable to realign those boundaries to streamline the RI/FS process and thereby reduce the number of work plans that must be written. The position paper suggests that the aim of this integration and realignment of operable unit boundaries is to focus the Environmental Restoration effort on those areas requiring remediation.
4. As a result of the agencies proposal presented in the position paper, there are many impacts, both positive and negative. Several points regarding the proposals were discussed as follows:
 - o Six Operable Unit Work Plans are currently in the process of being written or issued for final approval. Any shift in approach for these plans would impact costs and the ability to meet milestones. It is Ecology's wish to build on what has already been done, not to restructure those plans that are already in process.
 - o There is time to modify the 100-HR-3 Work Plan to better integrate it with the 100-HR-1 Work Plan and make both consistent with the

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300-FF-1 and FF-5 Work Plans. Guidance is needed from Ecology on specific changes to be made for RCRA/CERCLA integration, particularly in the case of groundwater contamination by 183-H.

- o The 100-BC-1/BC-5 Work Plans and currently in initial review at WHC. Changes in approach would be costly and time consuming to implement.
- o The first work plans that could be adapted to the revised approach are probably the 100-KR-1 and 100-KR-4 plans.
- o Alteration of operable unit boundaries should be conducted in the near future, but at DOE's discretion.
- o Supporting documentation such as determination of background, and handling of purgewater, is needed to support all programs including revision of unit boundaries.
- o There will need to be a realignment or revision to the current TPA milestones. These changes would reflect the altered distribution of operable units and the level of effort required to accomplish the work. EPA/Ecology indicated that no relief from milestones would be given.
- o The approach will place additional emphasis on the groundwater operable units by redefining the boundaries of the source operable units.
- o This proposed approach applies only to the 100 and 300 areas.
- o The proposed survey approach to data acquisition raises questions on the adequacy (quantity and quality) of data for conducting risk assessments.
- o Ecology stated that when problems are identified and actions are being taken, out-year milestones may be subject to modification.
- o The question of what constitutes an "environmental threat" was discussed. Ecology suggested that, at the present time, hexavalent chromium, carbon tetrachloride and hydrologic changes that affect plume migration are examples of environmental threats.
- o Biota investigations need to be consistent within and between aggregate areas.
- o Ecology wants to see a response from DOE/WHC on the suggestions provided in the draft position paper.

Action ST5.2: DOE/WHC is to provide a written response to the draft position paper by the January 1990 Unit Managers Meeting.

5. EPA is preparing a letter outlining recommendations on a "better way to do business." EPA will propose more involvement by the regulatory agencies early in the work plan preparation process. This will provide

a way to reduce the number of work plan review cycles.

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Attachment 2

Attendance List
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NAME	ORGANIZATION	PHONE
D.A. Myers	GSSC/IT	376-0969
F.V. Roeck	WHC	376-8819
A.D. Krug	WHC	376-5634
E.W. Powers	WHC	373-2774
D.R. Einan	EPA	376-3883
D.R. Sherwood	EPA	376-9529
Paul Day	EPA	376-6623
L. Goldstein	Ecology	(206) 438-7018
C. Cline	Ecology	(206) 438-7556
S. Wisness	DOE	376-6798
T. Wintczak	WHC	376-0902
J. Broderick	DOE	376-4197
R. Stewart	DOE	376-6192
S. Clifford	WHC	376-5137
W. Johnson	WHC	376-1721
M. Lauterbach	WHC	376-5257
J. Patterson	WHC	376-0568
J. Ayres	WHC	376-3918
W. Green	WHC	376-3886
W. Wright	GAI	(206) 883-0777
F. Ruck	WHC	376-9876
L. Powers	WHC	376-6204
L. Ames	PNL	376-2242
M. Hagood	WHC	376-9664
L. Hulstrom	WHC	376-4034
S. Weiss	WHC	376-1683
J. Chiaramonte	GSSC/IT	376-7829

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