

**SUBJECT** DISPOSITION OF COMMENTS ON THE 100-HR-3 OPERABLE UNIT RECORD OF DECISION AMENDMENT FOR IN SITU REDOX MANIPULATION

**TO** Distribution

**FROM** G. A. Day *(Signature)*

**DATE** August 20, 1999

**ATTENDEES**

J. W. Badden H9-03  
G. A. Day H0-21  
J. S. Fruchter K6-96  
R. L. Jackson H9-02  
V. J. Rohay H0-21  
W. W. Soper B5-18  
L. C. Swanson H9-02  
A. C. Tortoso H0-12

**DISTRIBUTION**

Attendees  
M. A. Buckmaster X9-10  
L. E. Gadbois B5-01  
J. D. Isaacs H0-21  
L. M. Johnson H9-01  
R. W. Ovink H9-03  
W. H. Price H0-20  
B. L. Vedder H0-02  
V. R. Vermeul K6-96  
M. D. Williams K9-36  
Administrative Record c/o H0-09  
Document and Information Services H0-09



A meeting on the above subject was held on August 18, 1999 at 3350 George Washington Way, conference room 2C58. The purpose of the meeting was to receive and disposition comments on the draft Amended Record of Decision for the 100-HR-3 Operable Unit (Amended ROD).

During preparation and review of the Amended ROD, a discrepancy was noted between the federal and state ambient water quality standards for protection of aquatic receptors. Currently, the federal standard for hexavalent chromium is 11 µg/L and the Washington State standard for hexavalent chromium is 10 µg/L. However, in 1996 when the ROD for the interim action to use pump-and-treat at the 100-HR-3 Operable Unit was signed, both the federal and state standards were 11 µg/L. W. W. Soper (WA Department of Ecology) will follow up on this issue and indicated that it will remain unresolved for now.

W. W. Soper, Washington Department of Ecology, provided his comments verbally on the draft Amended ROD. In general, he felt that the Amended ROD reads well.

W. W. Soper will call L. E. Gadbois to request the Environmental Protection Agency's comments on the Amended ROD and provide them to A. C. Tortoso.

R. L. Jackson will incorporate the comments from W. W. Soper and L. E. Gadbois by 8/26. The responsiveness summary can be added once the public comment period closes (August 23 plus five business days).

The project team discussed the number of compliance wells needed for the ISRM barrier. It was agreed that a minimum of three compliance wells will be required for the FY00 barrier. The need for additional compliance wells will be determined when the barrier is expanded, and approved by the Washington Department of Ecology at that time.

A. C. Tortoso stated that the bald eagle will remain on the endangered species list for another two years. The ISRM project is covered by the site bald eagle management plan and no additional documentation should be necessary.

A. C. Tortoso will send the ISRM Remedial Design Report/Remedial Action Work Plan (RDR/RAWP) to the National Park Service once it has been completed.

The cultural resource review and ecological resource review for the ISRM barrier will need to be completed as early in the next fiscal year as possible. A. C. Tortoso will send the results to the State Historic Preservation Officer.

#### **Actions**

G. C. Henckel will provide the text authorizing continuation of the ISRM treatability test to DOE-RL for concurrence by Ecology.

W. W. Soper will follow up on the appropriate hexavalent chromium ambient water quality standard to use in the Amended ROD for ISRM.

W. W. Soper will call L.E. Gadbois to request EPA's comments on the Amended ROD and provide them to A. C. Tortoso.

R. L. Jackson will incorporate Ecology's and EPA's comments on the Amended ROD and provide a revised draft by 8/26.

W. W. Soper will provide comments on the RDR/RAWP.