Meeting Minutes CCN 105405 Supersedes Meeting Minutes 105243 (Unit Managers' Meeting: 300 Areas Remedial Action Unit/Source Operable Unit held 10/22/2002

0058965

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Unit Managers' Meeting: 300 Areas Remedial Action Unit/Source Operable Units

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Owen Robertson	DOE-RL, RP (A3-04)
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John April	BHI (L6-06)
Rich Carlson	BHI (H0-17)
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Lorna Dittmer	BHI (H0-02)
Jack Donnelly	BHI (H0-17)
Ella Feist	CHI (H9-01)
Larry Hulstrom	FH (E6-35)
Jeff Lerch	CHI (L6-06)
Jenifer Linville	CHI (H9-01)
Walter Remsen	BHI (H0-17)
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Distribution

Unit Managers' Meeting: 300 Areas Remedial Action Unit/Source Operable Units

Mary Jarvis ..... DOE-RL, RP (A5-15)
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Mike Thompson ..... DOE-RL, RP (A6-38)
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Mike Goldstein ..... EPA (B5-01)

Brenda Jentzen ..... WDOE (Kennewick) (B5-18)
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Michael Wetzler ..... BHI (H0-17)
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Please inform Michael Wetzler (372-9562) – BHI (H0-17)
of deletions or additions to the distribution list.

105405

Meeting Minutes Transmittal/Approval
300 Area Unit Managers' Meeting
Remedial Action and Waste Disposal Unit/Source Operable Unit
3350 George Washington Way, Richland, Washington
October 2002

APPROVAL: _____ Date 1/21/03
Owen Robertson, 300-FF- 1 & 300-FF-2 Area Unit Managers, RL (A3-04)

APPROVAL: _____ Date 1/21/03
Kevin Leary, 618-10 & 618-11 Area Unit Manager, RL (A6-38)

APPROVAL: _____ Date 11/18/02
Mike Thompson, 300-FF-5 Area Unit Manager, RL (A5-13)

APPROVAL: _____ Date 11/18/02
John B. Price, Cleanup Project Manager, WDOE (B5-18)

APPROVAL: _____ Date 11/18/02
Mike L. Goldstein, 300 Aggregate Area Unit Manager, EPA (B5-01)

Meeting minutes are attached. Minutes are comprised of the following:

Attachment 1	--	Agenda
Attachment 2	--	Attendance Record
Attachment 3	--	300 Area Meeting Minutes – October 22, 2002
Attachment 4	--	Previous Open Action Items List
Attachment 5	--	Proposed Closeout Plan for the 618-4 Burial Ground
Attachment 6	--	618-5 Staging Piles
Attachment 7	--	Addendum to Air Monitoring Plan for 618-4 and 618-5 Burial Grounds Remedial Action

Prepared by: Jenifer Linville/ Michael Wetzler (H0-17) Date Jan 27, 2003

Concurrence by: Vern Dronen, Project Manager
BHI Remedial Action and Waste Disposal Project (H0-17) Date 1/27/03

Attachment 1

105405

UNIT MANAGERS MEETING AGENDA

3350 GWW 1B45

October 22, 2002, 1:00 – 3:00 p.m.

300 Area

Administrative (1:00 – 1:15)

- Action Item List
- Meeting minutes status
- Next UMM is November 19, 2002, 1:30 – 3:30, 3350 GWW (1B45)

300 Area Remedial Action (1:00 – 1:45)

- 618-4 Remediation Status
- 618-5 Remediation Status

300 Area Design & Assessment (1:45 – 2:15)

- Kd/Leach Study Uranium Conceptual Site Model
- Surface Land Use/Agreement in Principle for changing cleanup endpoints
- 618-10/11 Design work
- Institutional Controls Plan Assessment

300-FF-5 (2:15 – 3:00)

- 300-FF-5 O&M Plan / SAP (Status of sampling and reporting)
- 300 Area presentation being developed for M. Thompson

Meeting Minutes Schedule

- Draft – 1 week
- Distribute – 1 Day
- Review – 1 week
- Incorporate – 1 week
- Finalize – Next UMM

Attachment 2

Remedial Action and Waste Disposal Unit Managers' Meeting
Official Attendance Record – 300 Area
October 22, 2002

105405

Please print clearly and use black ink

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
Jack Donnelly	BHI	P.E.L.	372-9565
K. Michael Thompson	DOE-RL	Um FFOS	373-0750
RA Carlson	BHI	300 Design	372-9632
Mike Goldstein	EPA	EPA	376-4919
Dick Jaquish	WDOH		376-5466
John April	BHI	300 Area Task Lead	372-3008
Owen Roberts	RL	Sampling	373-6295
Matt Haass	BHI	300 Area Res. Eng	373-6372
Roger Ovink	CHI		375-9426
Ella feist	CHI	300 Area Support	372-9140
Steve Clark	CHI	300 Area Sup.	372-9531
Jeff Lerch	CHI	300 Area RA	373-5904
Pam Doctor	BHI	Risk Assess	372-9107
Larry Hulstrom	FH	618-10/11	373-3928

DRAFT 300 AREA UNIT MANAGER'S MEETING MINUTES
Tuesday, October 22, 2002
3350 GWW, 1B45, 1:00 p.m.

Review of Action Item List – All action items were closed.

Meeting minutes status – August 2002 meeting minutes were signed. September 2002 meeting minutes are awaiting signature from John Price (Ecology) and Kevin Leary (DOE).

The next 300 Area Unit Managers Meeting is scheduled for Monday, November 18, 2002, 1:30-3:30, 3350 GWW, 1B45

300-FF-5 OPERABLE UNIT

- ***Shoreline Study*** - Mike Thompson (DOE) announced that the Columbia River shoreline study report by Department of Health/Pacific Northwest National Laboratory (PNNL) is publicly available.

** **Action: Mike Thompson (DOE) to provide copies of shoreline study to the 300 Area Unit Managers.**

- ***300-FF-5 O&M Plan Update*** - Mike Thompson (DOE) scheduled a meeting with EPA and the Department of Health for Wednesday, October 23, 2002, at 8:30 a.m. to update Mike Goldstein (EPA) on the 300-FF-5 O&M Plan and shoreline sampling and reporting. Mike Goldstein (EPA) asked when drilling and sampling would occur in the 300 Area. It was announced that well drilling may occur in February, and sampling would be concurrent with drilling.

300 AREA REMEDIAL ACTION

- ***618-4 Remediation Status*** – John April (BHI) discussed the status of the 618-4 Burial Ground. Only LDR (landfill disposal restricted, lead-containing) material remains to be loaded out and transported to the ERDF for disposal. It is anticipated that cleanup of the 618-4 Burial Ground will be complete in mid-November. Jeff Lerch (CHI) distributed a draft closeout plan for the 618-4 Burial Ground (Attachment 1). A meeting was set for 11:00 a.m. on October 30, 2002, at Mike Goldstein's (EPA) office to discuss the proposed sampling and closeout approach.

- ***618-5 Remediation Status*** – John April (BHI) discussed the status of the 618-5 Burial Ground. Excavation operations have been performed in the northwest corner and eastern

edge of the Burial Ground. The excavation has been going well. It is anticipated that excavation operations will be more difficult in the central portion of the site where large amounts of lead contaminated soil/ash material and radioactive lead solids were encountered in test pits. It was discussed that remediation and disposal schedules would depend on available funding and how quickly the waste could be treated at the ERDF.

618-5 Staging Pile – Jeff Lerch (CHI) discussed the staging pile area operations at the Burial Ground. Excavated material has been put into the west and south staging pile areas as previously authorized by EPA. The start date for use of the staging pile areas was October 1, 2002. Clarification of previous discussions was provided to identify that radioactive lead solids sorted from in the soil may be bulk stockpiled in the staging pile area. Mike Goldstein (EPA) asked if samples had been collected beneath the 618-5 Burial Ground staging pile areas and advocated minimizing staging contaminated materials in clean areas. Jeff Lerch (CHI) replied that samples had been collected and archived. An offline meeting to discuss closeout of staging pile area of stockpiles was suggested.

Air Monitoring Plan – The approved addendum to the Air Monitoring Record for 618-4 and 618-5 Burial Grounds was included in the meeting minutes by Ella Feist (CHI) (Attachment 2).

- ***Regrading Plan*** – Matt Haas (BHI) discussed the planning phase for the engineering design package for regrading the 300-FF-1 Sites. The baseline schedule identifies activities to support contract award by the end of March 2003. The goal of the engineering design is to balance cut and fill material and therefore avoid having to import offsite fill material. Fill material will be obtained from cuts made to the eastern berms of the North and South Process Ponds and from the high area between the ponds. Using onsite borrow material will greatly reduce regrading costs. Design decisions need to be made in December. A preliminary regrading plan is available. EPA expressed some concerns that the regrading plan would not support the industrial redevelopment of the site.

**** Action: John April (BHI) will bring a copy of regrading plan to one of Mike Goldstein's (EPA) meetings.**

300 AREA DESIGN AND ASSESSMENT

- ***Kd Leach Study / Uranium Conceptual Site Model*** – Rich Carlson (BHI) discussed the 300 Area Kd Leach Study and Uranium Conceptual Site Model. The report was submitted for review in August. Comments were received from the U.S. Geological Survey, technical reviewers, and internal reviewers. These comments have been forwarded informally to PNNL.

  Rich Carlson (BHI) stated that the comments received to date were discussed with PNNL the week of October 14, 2002. PNNL has one month to write and issue formal comment responses and the final report.

Mike Goldstein (EPA) and Dick Jaquish (DOH) agreed to submit comments on Kd Leach Study/Uranium Conceptual Site Model to Rich Carlson (BHI) on October 24, 2002. Mike Goldstein stated that his overall thoughts were that the PNNL Kd/Leach Study report should focus on providing a complete technical summary of the two-year study effort. It is important that the results of the study be presented in a manner that enables the ERC team to develop the conceptual site model in the white paper. The white paper is intended to support activities in the 300-FF-1 Operable Unit (OU) at the end of December. An agreement will be documented by EPA that activities in the 300-FF-1 OU may proceed.

Mike Goldstein (EPA) asked to discuss EPA's comments and the other comments the week of October 28, 2002. He arranged for an 8:30 am meeting on October 30, 2002, to be held in the EPA's conference Room.

- ***Surface Land Use/Agreement in Principle for Changing Cleanup Endpoints*** – A meeting with Rich Carlson (BHI), Mike Goldstein (EPA), and Owen Robertson (DOE) was arranged for 1:00 p.m. on Wednesday, October 30, 2002 at the EPA office to discuss the Surface Land Use Agreement and cleanup endpoints.

- ***618-10/11 Design Work*** – Larry Hulstrom (FH) discussed the status of the 618-10/11 design work. Several items have been discussed between DOE and the regulators regarding work scope for FY03, including updating the 300 Area RDR to include the initial remedial design schedule, conducting a workshop with offsite experts to discuss remedial design approaches, and initiation of authorization safety basis documents.

  As of the meeting date, the funding that was tentatively identified was inadequate to address all three items concurrently and was "below the line" (i.e., is unfunded). Therefore there is no activity currently planned for FY03 in this area unless the funding situation changes.

  Owen Robertson (DOE) and Mike Goldstein (EPA) agreed that money needed to be found to fund these activities, and that the update of the 300 Area RDR should be the driver.

- ***Institutional Controls Plan Assessment*** – Mike Goldstein (EPA) reported that nothing has been initiated for the Institutional Control Plan Assessment. Jamie Zeisloft (DOE) discussed with Rich Carlson (BHI) that a letter has been identified (and should be forthcoming) that discusses how annual institutional controls report and reviews will be conducted.

  It was announced that new institutional controls signs had been posted along the river shoreline and in the reactor areas.

- ***Drum Update*** – Mike Goldstein (EPA) thought it necessary to find an economical way to treat drums and proposed discussion of the DWP schedule. He requested an update regarding the baseline technology document for drummed waste treatment, and proposed scheduling a meeting and revisiting the topic at the next UMM.

  **** Action: [All] Revisit drum treatment topic and discuss DWP at the next UMM.**

ADDITIONAL ITEMS

- ***Revision to the 100 Area Remaining Sites SAP*** - Roger Ovink (CHI) discussed the proposed revision to the 100 Area Remaining Sites SAP to include candidate sites in the 300-FF-2 ROD.

300 Area Unit Manager Meeting Action Items Log (Open Items)

Action #	Action/Subject	Assigned To	Owed To	Assigned Date	Original Due Date	Adjusted Due Date	Date Complete	Status
02-09	Work with ERDF to develop a proposal for submittal to EPA regarding LDR waste staging.	John April	Mike Goldstein	9/17/02				
02-10	Provide copies of the Columbia River shoreline study to the 300 Area Unit Managers.	Mike Thompson	300 Area Unit Managers	10/22				
02-11	Revisit drum treatment topic and discuss DWP at the next UMM.	All		10/22	11/18			
02-12	Provide a copy of regrading plan.	John April	Mike Goldstein	10/22				

Attachment 4

Last Revised on 11/06/02

PROPOSED CLOSEOUT PLAN FOR THE 618-4 BURIAL GROUND

The following information provides a proposed approach for closeout of the 618-4 Burial Ground including discussion of process history and historical operations, excavation operations, bias samples, verification samples, and the model for the residual vadose zone.

1.0 PROCESS HISTORY AND PREVIOUS INVESTIGATIONS

Prior to excavation, little information was available on the inventory and source of waste deposited in the 300 Area burial grounds. It is believed that the 618-4 Burial Ground operated from 1955 through 1961. During the late 1940's and throughout the 1950's, numerous activities were conducted in the 300 Area to support fuel fabrication and process development. Besides information that the 618-4 Burial Ground contained miscellaneous materials contaminated with radioactive uranium, there was little historical information available on the inventory of materials that were deposited there. It was unknown if liquid waste materials were disposed of in the 618-4 Burial Ground.

Previous investigations at the 618-4 Burial Ground included geophysical surveys, soil gas surveys, test pit excavation, and groundwater monitoring. There has been no groundwater contamination attributed to the 618-4 Burial Ground based on the groundwater monitoring results. A complete summary of process history and previous investigations is provided in the *618-4 Burial Ground Excavation Report* (BHI-01200).

2.0 EXCAVATION SUMMARY

Excavation of the 618-4 Burial Ground was initiated in February 1998. In April 1998, excavation and sorting operations were suspended pending identification of a treatment and disposal pathway for a large number of drums containing depleted uranium waste that were unearthed in a central portion of the burial ground. Excavation and sorting operations were resumed in April 2002. By the end of September 2002, excavation/ sorting operations and transport of all drummed waste to the ERDF (staging or disposal) were complete. Loadout and transport of stockpiled soil to the ERDF is scheduled to be complete in November 2002. Major waste streams encountered at the 618-4 Burial Ground are summarized in Table 1.

In addition to the major waste streams encountered, smaller quantities of asbestos, wood debris, miscellaneous drummed waste, intact bottles, dried paint, tar, and other items were unearthed in discrete areas of the burial ground. A complete listing of waste unearthed from the burial ground and managed as non-bulk material is provided in Attachments 1 and 2.

Table 1. 618-4 Burial Ground Major Waste Streams.

Waste Stream	Quantity	Major Contaminants	ERDF Disposition
ACL Soil & Metal Debris	28,542 ust[a]	Uranium	Direct Disposal
LDR soil (lead)	11,054 ust[a]	Uranium, Lead	Stabilization/Disposal
LDR soil (barium)	220 ust	Uranium, Barium, Lead, Chromium	Stabilization/Disposal
Lead solids	290 ust[a]	Lead, Uranium	Encapsulation/Disposal
DU chips/oil	520 drums	Chips – Uranium Oil – Uranium, PCBs, Lead, Barium, TCE, PCE, MEK, Benzene	Staging Area
DU oxide	228 drums	Uranium	Direct Disposal
LDR DU oxide	38 drums	Uranium, Cadmium, Lead, Barium	Staging Area

[a] Listed values for bulk material are based on actual quantities through the end of September 2002 plus the estimated quantity of stockpiled material as of October 1, 2002.

Radiological surveys were performed throughout the excavation and sorting process. With one exception, there was nothing in the survey results to indicate the presence of radioactive contaminants other than uranium. This is also consistent with sampling data from waste characterization. The exception was a few pieces of flatstock metal that were identified during inspection of an excavated drum. The metal pieces contained thorium.

IH monitoring was performed throughout the excavation process. Other than organic vapors detected in the headspace of some of the intact drums that were unearthed, field instruments used for IH monitoring did not detect any organic vapors in the breathing zone, excavated material, anomalous waste, or residual soil.

Other than the oil originally packaged with the depleted uranium chips for stabilization and small amounts of liquid present in some of the intact bottles, there was no liquid waste unearthed during the excavation operations. In addition, there was no evidence of historical bulk liquid disposal observed during excavation of the burial ground. However, there was evidence that oil had leaked from some of the drums containing depleted uranium waste (i.e., oil stained soil surrounding drums and low levels of oil inside some of the drums containing depleted uranium chips). Consequently, it is unlikely that the amount of liquid waste identified in the 618-4 Burial Ground provided a significant driver for migration of contaminants into the vadose zone below the burial ground.

3.0 BIAS SAMPLING

Collection of bias samples beneath four locations where larger quantities of specific waste streams were unearthed from a common area is proposed to verify the absence of hot spots. The biased samples will be collected at the same time the random verification sampling is performed. Biased sample results will be documented in the CVP but will

not be included in the statistical analysis performed for site closeout. The bias sampling approach and proposed locations are summarized in Table 2 and Figure 1, respectively.

Table 2. Bias Sampling Approach.

Waste Stream	# Samples	Constituents	Cleanup Level
Depleted Uranium – Beneath area where drummed waste was and oil stained soil was excavated.	1	Uranium (total) Lead Cadmium Barium PCBs TCE PCE MEK Benzene	350 pCi/g 1000 mg/kg 3500 mg/kg 245,000 mg/kg 17 mg/kg 0.398 mg/kg 0.0858 mg/kg 480 mg/kg 0.151 mg/kg
Barium – Beneath area where 2 discrete layers of barium contaminated soil was excavated and stockpiled between 1998 and 2002.	1	Uranium (total) Barium Lead Chromium	350 pCi/g 245,000 mg/kg 1000 mg/kg 3500 mg/kg
Lead – Beneath area where lead contaminated soil and lead solids where stockpiled between 1998 and 2002.	1	Uranium (total) Lead	350 pCi/g 1000 mg/kg
Asbestos – Beneath area where large quantities of asbestos intermixed with soil was excavated.	1	Asbestos	

Other than the area where soil was stockpiled between 1998 and 2002, there are no specific bias samples proposed beneath areas where lead contaminated soil and/or lead solids were excavated. These waste streams were widespread throughout the burial ground rather than in any discrete area. Consequently, lead will be a contaminant of concern (COC) for site closeout and the collection and analysis of random verification samples will be adequate to ensure the absence of hot spots.

4.0 VERIFICATION SAMPLING

Verification sampling will be conducted at the 618-4 Burial Ground to demonstrate that cleanup levels are met in the residual soil and confirm that overburden/layback soil are acceptable for use as backfill material. In accordance with the SAP (DOE/RL-2001-48), each verification sample will be a composite of 4 soil aliquots collected from random locations within decision subunits. The number of decision subunits is determined by the overall footprint area for each verification item. The default number of verification samples for each decision subunit is four. The anticipated number of verification samples required based on the size of the excavation and the BCL stockpile is listed in Table 3.

Table 3. Number of Verification Samples Required for 618-4 Burial Ground.

Decision Unit	Estimated Footprint (ft^2)	Size Classification (ft^2)	Decision Subunits	Verification Samples (composite)
Residual soil-sidewalls (shallow zone)	34,000	<100,000	1	4
Residual soil – floor (deep zone)	47,000	<100,000	1	4
BCL stockpile	29,000	<100,000	1	4

Based on the historical information found in WIDS, the type of material excavated, radiological surveys, IH monitoring, and visual observation of the excavation process, the COCs and associated cleanup levels for verification sampling are listed in Table 4.

Table 4. Contaminants of Concern for 618-4 Burial Ground.

Contaminant of Concern[a]	Cleanup Level
Lead	1000 mg/kg
Uranium (total)	350 pCi/g

[a] Listed COCs are based on assumption that all bias sample results are below the applicable cleanup levels. If bias sample results exceed cleanup levels, additional COCs may be identified.

Random verification sample locations will be determined using final civil survey and an automated design program originally created for the 100 Areas. Some portions of the clean soil stockpile are not safely accessible to the sampler. If the sample design results in the identification of locations that do not have safe access by foot, alternate sample locations will be selected and documented in the field logbook.

5.0 VADOSE ZONE PROFILE

In accordance with the RDR/RAWP, excavation of a single test pit is proposed to establish a residual soil profile for the 618-4 Burial Ground. The test pit will be excavated to the high water mark <elevation>. Samples will be collected 1-m intervals and analyzed for the site COCs listed in Table 4. The proposed location for the test pit is beneath the area where the depleted uranium drummed waste was excavated (Figure 1). A final civil survey and area groundwater depths (high water mark) will be used to determine the thickness of the residual vadose zone at the burial ground.

Figure 1. Proposed Bias Sample and Test Pit Locations.

Concurrence:

John April, BHI Task Lead	Date
Owen Robertson, DOE-RL Project Lead	Date
Mike Goldstein, EPA Project Lead	Date

618-5 STAGING PILES

BACKGROUND

The Remedial Design Report/Remedial Action Work Plan (RDR/RAWP) for the 300 Area (DOE/RL-2001-47, Rev. 0), Section 4.4.2, contains the requirements for managing staging piles in accordance with 40 Code of Federal Regulation (CFR) 264.554. The U.S. Environmental Protection Agency (EPA) approved the RDR/RAWP, which provided general authorization to operate staging piles during remediation of the 300-FF-2 Operable Unit (OU). In addition, the RDR/RAWP requires EPA approval of staging pile locations.

Use of staging piles has many potential benefits including increasing operational efficiency and providing an added margin of safety for workers through reduced congestion within the AOC. These benefits will help contribute to avoiding negative impacts to the baseline schedule and budget.

STAGING PILE LOCATIONS

Attached is a map of the staging pile areas for the 618-5 burial ground. There are two primary staging areas; one west of the 618-5 burial ground and one south of the 618-5 burial ground. Within the staging pile areas, staging piles will be placed that are within the contiguous property of 300-FF-2 OU and adjacent to the 618-5 Area of Contamination (AOC).

CONTROLS

The following controls will be implemented to ensure compliance with the substantive provisions of 40CFR 264.554:

- The staging pile area will be surrounded with a minimum of a 15-centimeter (6-inch) berm to control run-on/run-off control prior to use.
- The staging pile area to the west of 618-5 burial ground will be utilized first and EPA approval will be obtained prior to using the area to the south of 618-5 burial ground.
- Dust control practices will be deployed consistent with soil piles managed in the AOC, including the use of crusting agents, as necessary, to minimize migration/leaching of contaminants into underlying soil.
- Surveys of the staging pile area will be performed prior to placement to ensure no cross-media transfer and staging waste on previously contaminated areas.
- Without prior approval from EPA, the staging pile area will not be operated more than 2-years from the date the first staging pile is placed in the staging pile area. It is expected the work will be completed within 2-years. The Unit Managers Meeting will be the forum to identify the start date.
- Gross sorting of waste will be performed within the AOC to identify and remove drums or other containers from the bulk soil prior to moving the soil to the staging piles.

- Additional sorting may be required on bulk soil in the staging pile area. Any dangerous waste identified will be packaged in drums or bulk stockpiled (depending on the nature/quantity of material) and managed appropriately ~~(drums)~~ within the staging pile area and within close proximity to the specific staging pile. Drums will be properly labeled, managed, and inspected and should be transported for disposal or treatment as soon as practicable. Dangerous waste (drummed) must be inspected weekly or as described in BHI-EE-10.
- Following removal of the staging piles, bias and random samples will collected consistent with the Sampling and Analysis Plan (SAP) (DOE/RL-2001-48) to verify compliance with cleanup objectives. Bias samples will be collected at locations where staging piles existed and will be analyzed for consituents that were present in the associated staging piles. For random samples, the staging pile area shall be considered a shallow zone decision unit in accordance with the SAP. The decision unit will be divided into subunits based on size and the prescribed number of random verification samples will be collected (Table 3-3), excluding any general areas that were unused during operation of the staging pile area. Verification samples will be analyzed for the site Contaminates of Concern (COCs) and results will be compared with the 300-FF-2 cleanup levels and documented in the Cleanup Verification Package (CVP) to demonstrate that remedial action objectives have been achieved. The closeout approach for the staging pile area will be presented and agreed to in a UMM.

Lerch, Jeffrey A

From: Goldstein.Mike@epamail.epa.gov
Sent: Thursday, September 12, 2002 5:49 PM
To: Lerch, Jeffrey A
Cc: Duranceau, David A; April, John G; Donnelly, Jack W; BLVedder@mail.bhi-erc.com; Einan.David@epamail.epa.gov
Subject: Re: FW: Staging at 618-5

618-5staging1.jal.doc

Jeff,

With this sentence added, I concur with everything in the "controls" section except the first sentence of the last bullet. My issue is that the purpose of the baised and random sampling is not to verify "compliance with cleanup objectives," but rather to verify "that the staging area is clean (i.e., has not been contaminated through use) and therefore does not require any long-term institutional controls." This is especially relevant to this location as it has been certified as "clean closed" with respect to chemicals via the RCRA closure process.

Also, with regard to the e-mail Jack sent out that describes the rationale for why we are using the staging pile regulations as opposed to simply expanding the area of contamination, I am curious to hear Bechtel's interpretation of how the requirements outlined in 264.554 for "closing" a staging pile sited in an uncontaminated area (which cites sections 264.258(a) and 264.111) and public notification are being met as well.

That being said, I have no problem with you proceeding to use the designated staging pile areas using the language contained in the controls section of this draft (with the exception noted above). If we modify the rationale or other language in the RDR/RAWP as a result of the other questions I have asked, it will not affect my approval of the procedure you have outlined in this attachment (except as noted).

If you have any questions about this, call me at 376-4919.

Mike

"Lerch, Jeffrey A" <JALerch@mail.bhi-erc.com> 09/12/2002 05:03 PM

To: Mike Goldstein/R10/USEPA/US@EPA, "Goldstein, Michael L" <Michael_L_Goldstein@rl.gov>
cc: "Donnelly, Jack W" <JWDonnel@mail.bhi-erc.com>, "April, John G" <JGApril@mail.bhi-erc.com>, "Duranceau, David A" <DADuranc@mail.bhi-erc.com>
Subject: FW: Staging at 618-5

Mike -

As discussed, a sentence has been added to the attached file to clarify that
bias samples will be collected from locations where stockpiles existed and
anlyzed for constituents present in the stockpiles. Thanks for your help.

<<618-5staging1.jal.doc>>
> -----Original Message-----
> From: Donnelly, Jack W
> Sent: Thursday, September 12, 2002 4:28 PM
> To: Goldstein, Mike
> Cc: Lerch, Jeffrey A
> Subject: Staging at 618-5
>
> Good afternoon:
>
> Attached is the 618-5 staging file, which was modified based on our
> earlier conversation. Look forward to having you ok this and approve this
> at the Sept. 17 UMM. Thanks again Mike.
>
>
(See attached file: 618-5staging1.jal.doc)

ADDENDUM TO AIR MONITORING PLAN FOR 618-4 AND 618-5 BURIAL GROUNDS REMEDIAL ACTION

Proposed Change:

A new planned activity has been identified for the 618-5 Burial Ground. The new activity consists of using a high-efficiency particulate air (HEPA) vacuum during decontamination activities. The original and proposed text are included.

Planned Activities
Soil and Miscellaneous Debris Excavation

Paragraph modified as follows:

The remedial action will use standard excavation equipment for loading and hauling. The loading of contaminated material into waste containers may result in soil spilled on the waste containers and/or haul trucks. Haul trucks with loaded containers will enter a survey area where they will be screened to detect exterior contamination. A decontamination station(s) will be established to decontaminate containers, ~~and~~ haul trucks, equipment, and personnel as required. Waste containers, ~~and/or~~ haul trucks, equipment, and/or personnel will be decontaminated by conventional means such as brushing or wiping or with high-efficiency particulate (HEPA)-filtered vacuum cleaners. The HEPA-filtered vacuum cleaners may also be used to decontaminate other equipment or to pick up other loose contaminated materials, as needed. More aggressive decontamination methods (such as grinding or wet grit blasting) may be used for equipment decontamination if the other methods fail. Decontaminated trucks and containers will then proceed to the container staging area where the transportation subcontractor will pick up the containers for transport to the ERDF.

Inventory:

The following two paragraphs are added to the end of Section 2.1:

The inventory for HEPA vacuuming is based on soil concentrations for the 618-4 Burial Ground, assuming that the HEPA vacuum, which has a 12.3-L (3.25-gal) capacity, would be filled once a month. To determine the annual possession quantities, the inventory was multiplied by a release fraction according to the requirements from WAC 246-247-030 (21)(a). A release fraction of 1.0 was used for this activity. These values were the input to the CAP-88 PC model, which calculated the potential total effective dose equivalent (TEDE) to the maximally exposed individual (MEI). The CAP-88 PC model summary and synopsis are presented in BHI Calculation No. 0300X-CA-V0015, Rev. 0.

The calculated potential unabated annual TEDE to the MEI from the HEPA vacuum activity is 2.70 E-02 mrem/yr. The calculated potential unabated TEDE to the MEI from the 618-4 and

618-5 Burial Grounds remedial action, as reported in the original air monitoring plan, is 8.39 mrem/yr. This brings the new calculated unabated potential offsite dose to 8.42 mrem/yr.

Best Available Radionuclide Control Technology:

The following section is added to Section 3.0:

3.4 HEPA-Filtered Vacuum

The vacuum cleaners are equipped with HEPA filters that are considered BARCT for radioactive emissions at the Hanford Site.

Concurrence:

R. S. Acselrod — Date 9/27/2002
Washington State Department of Health

M. L. Goldstein — Date 10/7/02
Environmental Protection Agency

O. C. Robertson, Jr. — Date 9/25/02
U.S. Department of Energy,
Richland Operations Office

for D. E. Jackson — Date 9-26-02
U.S. Department of Energy,
Richland Operations Office