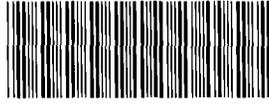


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May 16, 1995  
2510-95/58

Ms. Laurie Peterson-Wright  
EG&G Rocky Flats, Inc.  
P.O. Box 464, Bldg. 080  
Golden, Colorado 80402-0464

Subject:        Submittal of May 10, 1995 Meeting Minutes  
                  Technical Working Group Meeting for Operable Unit No. 7  
                  (MTS Contract 353017TB3)

Dear Ms. Peterson-Wright:

Enclosed are meeting minutes to document the May 10, 1995, technical working group meeting for the OU 7 landfill closure interim measure/interim remedial action and environmental assessment

If you have any questions, please contact me at your convenience.

Sincerely,

Myra Vaag  
Project Manager

Enclosure

cc:	W. Bartholomew w/o EG&G	B. Caruso	Stoller
	T. Lindsay EG&G	M. Eisenbeis	Stoller
	P. Martin EG&G	K. Fiebig	Stoller
	P. Corser TerraMatrix	S. Franklin	Stoller
		C. Gee	Stoller
		J. Jankousky	Stoller
		D. Palmer	Stoller
		B. Stephanus	Stoller
		MKV Chron w/o	

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Minutes for the OU 7 Landfill Closure IM/IRA/EA DD  
Technical Working Group Meeting  
May 10, 1995

The following topics were discussed:

**Leachate Collection and Treatment PAM**

CDPHE did not approve the proposed modification to the PAM, groundwater control using a slurry wall, because it does not fulfill the intent of the Pond Water IM/IRA dispute resolution, which was to collect leachate. DOE proposed a collection and passive treatment system in a telephone conversation on May 9.

The March 8, 1995, Leachate Collection and Treatment PAM will be modified and resubmitted to CDPHE and EPA. Because revisions are minor, the document will not go out for public comment again. CSM will prepare the conceptual design, the Title II design (CAD drawings), and the technical specifications. Stoller will prepare the PAM. EG&G will start the procurement process for construction (Davis-Bacon).

Any waste from construction or treatment (fill material in reactor) will be disposed in the landfill. ARARs or PRGs will be proposed as performance goals. Discharge will be monitored to evaluate performance of the passive treatment system. Results will be used to design the leachate treatment system for final closure.

The Draft Leachate Collection and Treatment PAM will be submitted to EG&G and DOE on May 24. After review and revision, the document will be submitted to CDPHE and EPA on June 15. The PAM will include a conceptual design, chemical-specific ARARs, and possibly a working schedule. The Title II design and technical specifications will be prepared separately from the PAM.

**Slurry Wall Maintenance Action**

CDPHE and EPA approved DOE's proposal to construct the slurry wall as a maintenance item instead of an accelerated action under a PAM. Stoller will stop work on the Seep/Groundwater Control PAM. TerraMatrix will continue to prepare the Title II design, technical specifications, and CQA Plan. EG&G, Stoller, and TerraMatrix plan to visit the site on May 11 to check the stake locations, look at contractor lay down areas, and determine the best location for the soil-bentonite slurry mixing areas. Stoller proposed using water from the East Landfill Pond for construction. EG&G will collect a sample of the pond water to use for the compatibility tests.

**Landfill Closure IM/IRA/EA Decision Document**

Proposed remedies for final closure include the landfill cap and a passive leachate treatment system. At this time, Stoller does not believe that groundwater treatment is necessary. Additional information (analytes that exceed ARARs in groundwater, wells in compliance, wells not in compliance, contaminant isoconcentration maps) will be presented at the meeting on May 17.

Unresolved issues are mainly regulatory issues such as the probability of successfully delisting leachate, need for an NPDES permit, point of compliance, and RCRA compliance versus endangered species. DOE will schedule a formal consultation with the US Fish and Wildlife Service before the Record of Decision for OU7 is prepared. DOE will attend a meeting with the Natural Resource Damage Assessment (NRDA) on May 25. EG&G and Stoller will prepare materials for distribution, including fact sheets and a color photograph.

215

## Action Items

- 01-210 Completed.
- 211 Research EPA guidance on applying for ARARs waivers (S. Franklin, Stoller). Two guidance documents that may prove useful were found: Overview of ARARs, Focus on ARAR Waivers, and RCRA ARARs, Focus on Closure Requirements. Completed.
- 212-216 Completed.
- 217 Research data usability for other OUs to see if OU 7, which used 1990 to 1995 data, is consistent (L. Peterson-Wright, EG&G). Data usability are not consistent between OUs. The use of 1990 to 1995 data at OU 7 will be documented in the project file. Completed.
- 218-229 Completed.
- 230 Research effectiveness, implementability, and cost of alternative technologies for slurry walls, such as the grout curtains/sheet pilings used at Hanford (T. Lindsay, EG&G). EG&G obtained information on the sheet pilings. Completed.
- 231 Completed.
- 232 Research RCRA regulations to determine if treatment for F039 listed waste is required under RCRA corrective action, and if so, do treatment standards have to be met (L. Peterson-Wright, EG&G, and M. Vaag, Stoller). In progress.
- 233 Completed.
- 234 Research VHS modeling, exposure scenario used, and location of hypothetical receptor well for delisting under CERCLA (J. Jankousky, Stoller). In progress.
- 235 Keep current on Pond Water IM/IRA issues (L. Peterson-Wright, EG&G). In progress.
- 236-237 Completed.
- 238 Survey and stake the proposed slurry wall. Field check the proposed slurry wall for location of mixing stations and potential problems with the existing fence (T. Lindsay, EG&G, and P. Corser, TerraMatrix). EG&G, TerraMatrix, and Stoller visited the site on May 11 to check the stake locations, look at contractor lay down areas, and determine the best location for the soil-bentonite slurry mixing areas. Completed.
- 239-240 Completed.
- 241 Arrange review of conceptual costs, including overhead percentage, contingency percentage, and health and safety costs (L. Peterson-Wright, EG&G). Contingency costs are generally put on the whole project, not just construction (25 percent is too high). EG&G procurement suggested using real costs. Completed.
- 242 Completed.

- 243 Investigate delisting strategy under RCRA (talk to G. Guinn, EG&G). Is a CDPHE conservative screen required? Can CERCLA delisting be used for no further action? (L. Peterson-Wright, EG&G, and M. Vaag, Stoller). Stoller obtained the 1993 EPA guidance document "Petitions to Delist Hazardous Wastes - A Guidance Manual." Stoller is researching the Hazardous Waste Identification Rule, which will be proposed to replace delisting. In progress.
- 244 Check regulations for each ARAR to determine if mean values or maximum values should be used to compare to the standard (S. Franklin, Stoller). In progress.
- 245-246 Completed.
- 247 Obtain a copy of the new flow chart for F039 determination, which is Figure 1 in the proposed Closure Strategy for OU 7 (L. Peterson-Wright, EG&G).
- 248 Keep current on sitewide point-of-compliance issues (L. Peterson-Wright, EG&G). In progress.
- 249 Determine threshold levels for HAP permitting requirements (L. Peterson-Wright, EG&G).
- 250 Revise groundwater and surface water ARARs for radionuclides in accordance with DOE Order 5400.5 (S. Franklin, Stoller).
- 251 Completed.
- 252 Compare mean concentrations of all analytes in groundwater downgradient of the landfill to ARARs (J. Jankousky, Stoller). Analytes that exceed ARARs in downgradient wells include the following: well 0786 (gross alpha, gross beta, 1,1-DCA, chloride), well B206789 (selenium, sulfate, benzene), well B206889 (nitrate/nitrite, sulfate, benzene, carbon tetrachloride, TCE, chloride), well 4087 (sulfate, fluoride), well B206989 (nitrate/nitrite, sulfate), well B207089 (benzene), and well B207189 (methylene chloride, chloride). No analytes exceed ARARs in the Phase II wells. Tables will be provided at the May 17 working group meeting. Completed.
- 253 Completed.
- 254 Obtain language on PQLs from L. Brooks (L. Peterson-Wright, EG&G). Information was faxed to Stoller on May 15. Completed.
- 255 Collect a sample of pond water for compatibility tests (T. Lindsay, EG&G).
- 256 Request comments on the Proposed Closure Strategy for OU 7 Draft Report from CDPHE and EPA (P. Witherill, DOE).
- 257 Distribute a memorandum asking for IDM and other waste material to help fill the volume of space remaining in the Present Landfill before closure in 1997 (T. Lindsay, EG&G). In progress.

### Next Meeting

The next meeting will be at 10:00 a.m. on May 17, 1995, in the small west conference room at EG&G. The topics of discussion include the passive leachate treatment system, revised Leachate Collection and Treatment PAM, nature and extent of contamination in groundwater downgradient of the landfill, point of compliance, and the Landfill Closure IM/IR/VEA Decision Document.

### List of Attendees

Name	Organization	Phone
Brian Caruso	Stoller	546-4338
Tom Lindsay	EG&G	966-6985
Laurie Peterson-Wright	EG&G Project Manager	966-8553
Myra Vaag	Stoller Project Manager	546-4417
Peg Witherill	DOE Project Manager	966-6585