CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER # 5400.1

95-RF-07121

DIST.	LTR	ENC
ENSUSSEN, STAN		
UHL, TONY		
ARD, BOB		
IANI, VIK		
IARTINEZ, LEN		
ICKAY, BOB		
'BRIEN, GEORGE		
OUR, NANCY		
OORHEIS, GARY		
VALLER, CAL		
IEDAHL, TIM		
IILL, JOHN		
SHELTON, DAVE		
VHALEY, DEBBIE		
Brooks, Laura	X	
Hill, John	X	
Wiemelt, K.	X	
CORRES.CONTROL	X	X
ADMIN RECRD/080		
TRAFFIC		
PATS/T130G		

CLASSIFICATION:

UCNI		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
11/3/95 SIGNATURE:
Date: Doc. Class. Rev
Waiver per Class. Office

IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
☐ PARTIAL/OPEN
☐ CLOSED

LTR APPROVALS:

LMB

ORIG. & TYPIST INITIALS:
LMB:msl

RF-46469 (Rev. 4/25/95)

KAISER•HILL
COMPANY

September 15, 1995

95-RF-07121

Jessie M. Roberson, Assistant Manager
Environmental Restoration
DOE, RFFO

Attn: D. George

MEETING MINUTES FROM THE OU1 DRC MEETING HELD AUGUST 25, 1995 - JAH-026-95

Action: None

The following are the meeting minutes taken by Kaiser-Hill at the OU1 DRC meeting held on August 25, 1995.

DRC Agreement:

1. Some action is appropriate.
2. Source removal by excavation is supported by the DRC because (a) it prevents further migration of contamination; and (b) because it has the best chance of success.
3. Groundwater at OU1 should be addressed in accordance with the sitewide groundwater strategy.
4. The groundwater strategy could be used to help define limits of excavation.
5. Timing of an OU1 remedy will be defined through IHSS prioritization.
6. Parties will convene a workgroup to define geometric boundaries and other elements of remedial design.
7. Institutional controls will be a necessary component of remedy selection of some individual IHSSs in OU1. These IHSSs will be defined by the working group.
8. Monitoring and french drain operation will be drastically reduced or eliminated in the future due to removal. Goal is elimination.
9. The DRC recommends that the draft groundwater strategy be completed in three months. Within three months of delivery of draft, if the draft is not finalized, the groundwater strategy reverts to the Dispute Resolution Process.

Jessie Roberson opened the meeting and stated that the existing dispute is over the proposed remedy at OU1. DOE proposed that each party list its interests/concerns. DOE started a list of its interests/concerns; EPA and CDPHE added to the list. Identified interests/concerns:

Kaiser-Hill Company, L.L.C.
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- •Technical justification for a removal action at OU1. (Removal in general sense, not as defined in CERCLA.)
- •Boundaries for potential removal (Physical boundaries)
- •Disposal and treatment requirements
- •Groundwater Point of Compliance (POC)
- •French drain operations
- •Setting a precedent to take an action
- •Protection, now and in the future
- •Cost
- •Consistency with action at the site (not piecemeal, but integrated) and effectiveness (length of liability in terms of time)

There was a brief discussion on the conditions at IHSS 119.1. It was agreed that the drums were placed within IHSS 119.1 approximately 25 years ago and that the French drain is approximately 200 feet from the source. It was agreed that there was contamination within the water table. The estimated amount of source contamination and the state of contamination, i.e., are there DNAPLs?, were not agreed upon. Plume estimates of less than 100 feet by 100 feet were agreed upon.

It was acknowledged that the DRC could not decide what action should be taken at OU1, but could define the minimum acceptable criteria to be considered for an action remedy. The technical teams would use the boundaries, determine the action and the costs associated with the action. (The outcome was the DRC Agreement list above.)

Groundwater POC:
DOE believes that this is a groundwater management issue because (1) there are concerns regarding the interface of groundwater to surface water, and (2) it is difficult to deal with groundwater as an isolated issue.

CDPHE stated that OU1 groundwater is far enough removed from any other groundwater contamination that it could be addressed separately from the site groundwater. There is discretion in determining a POC and it is possible to select a POC that is remedy dependent.

EPA stated that a remedy operation could not be turned off until compliance is achieved within the plume. On the other hand, monitoring could not be stopped unless the contamination is gone or obtain a technical impracticability waiver.

CDPHE pointed out that POC measures the effectiveness of the remedy and is therefore, remedy dependent. For example, if monitoring is selected, it needs to be upgradient of the french drain. If the french drain is kept in operation, the POC would be measuring the effluent from treatment downgradient of the french drain (the purpose would be to show that the french drain is working).

EPA raised a question as to whether the french drain isolates the contaminated water coming from OU1. Is it possible that the contaminated water is mixing with clean water? This would cause a large volume of water to be treated where it is not really necessary.

General Discussion:
The discussion was refocused on what is the driver for determining when to take an action? Look at the site as a whole. Does groundwater adversely affect what we are trying to protect?

Should individual pods of groundwater contamination be cleaned up when it is known that contamination will be left in place? It becomes a risk management issue.

The technical representatives of the group have a high level of confidence excavation would be able to remove the majority of the source.

EPA would like to see a ROD be developed and finalized based on the outcome of the technical working group.

The State believes that other IHSSs within OU1 may need to have institutional controls. These IHSSs will be identified by the technical working group. Until a final remedy is taken and the groundwater management strategy are finalized, OU1 will remain status quo with regards to operation of the french drain. EPA does not believe that contamination must go to zero, but contamination should go to ACLs which will be defined in the groundwater management strategy.

If you have any questions, please call Laura Brooks at extension 6130.

John A. Hill, Division Manager
Compliance & Performance Assurance

LMB:msl

Orig. and 1 cc - J. M. Roberson

cc:
J. E. Law RMRS
W. Katz "
J. L. McAnally "
A. M. Parker "
D. L. Schubbe "
ER Project File (2)
RMRS Records