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MEETING NOTES

TO: Distribution

DATE: March 29, 1994

FROM: Philip Nixon

PROJECT: Solar Pond IM/IRA

MEMO #: SP307:033094:02

ATTENDENCE:

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Harlen Ainscough, CDH
Scott Surovchak, DOE
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SUBJECT: Weekly Status Meeting

(I:\PROJECTS\722446\CORRESP\03309402.WPF\04/04/94)

1) Removal of the Phase II workplan from the IM/IRA-EA decision document.

Arturo Duran specified that the EPA is interested in expediting the Phase II field activities. However, the EPA has had second thoughts about removing the work plan from the IM/IRA-EA decision document because the document can be approved as a stand alone report.

It was generally agreed that removal of the work plan from the IM/IRA-EA decision document may be beneficial to prevent it from being held up by the IM/IRA project that may require an additional schedule extension. In addition, removal of the work plan from the decision document may increase the flexibility with respect to its preparation, review, and implementation. Currently the Phase II work plan has the same 43 day extension as the IM/IRA-EA decision document.

Arturo requested that the review of the work plan be moved forward on the IM/IRA-EA decision document round table review schedule so that the submittal of the work plan could be expedited.

EG&G/DOE indicated that they were interested in expediting the Phase II field activities if possible. The fiscal year funding availability will be assessed to determine if FY94 funding is available for early initiation of field activities.

Harlan Ainscough indicated that DOE has an approval to submit the Phase II work plan with the IM/IRA-EA decision document on May 27, 1994. He stated that DOE could submit a plan for removing the work plan from the IM/IRA-EA decision document to expedite the Phase II program if it is determined appropriate.

DOE/EG&G will investigate the potential for expediting the Phase II work plan.

Randy Ogg indicated that he is concerned with changing the project baseline because there are 4 contracts that need to be modified such that the consultants can legally follow a new baseline. Randy indicated that the schedule extension did not account for the time it typically takes to modify/change a contract. A contract procurement cycle can take from 2-3 months. EG&G will investigate the use of a directed contract modification to allow the work to commence as the contract modifications are negotiated.

2) Strategy for Developing PRGs/COCs for Ground Water Protection

Phil Nixon indicated that ES had received several comments that the IM/IRA-EA decision document should develop soil concentrations that are protective of ground water. A strategy was being developed to address the comments.

The need to establish protective soil concentrations is derived from the fact that the proposed design leaves contaminated soils beneath the subsurface drainage layer where they may be contacted by a rising water table.

Leigh Benson presented that ES was re-running the existing PRGs/COCs with the latest validated RFI/RI data. ES is also investigating the useability of the data to be consistent with the RFI/RI data.

Leigh indicated that two key decisions needed to be made to conduct this work:

1) Selection of an exposure scenario
2) Selection of comparison criteria.

ES has proposed the onsite resident scenario to be consistent with the pathways used for the previously determined upward scenario. This is very conservative since it is unlikely that the aquifer beneath OU4 could sustain a resident's water needs. Harlen Ainscough indicated that the CDH has never allowed this argument to refrain from using the onsite resident scenario.

There are 3 comparison criteria that can be used as PRGs for the protection of ground water

1) Human Health standards
2) Colorado Ground Water Protection standards
3) Risk-based PRGs (if none of the above standards are promulgated)

ES recommend using ground water protection standards for drinking water since the Phase II program will provide the data necessary for performing contaminant flow and transport, and risk assessment.

Harlen Ainscough indicated that under 40 CFR 265.111 (closure performance standards) DOE must control, minimize or mitigate the release of contaminants from below the subsurface drainage in order to gain CDH approval. Phil Nixon specified that the DOE would only be required to remediate to background concentrations if the calculated COC concentrations for ground water protection were less than background. The team agreed on this position.

Leigh Benson discussed that the PRGs/COCs for ground water protection will be used to locate additional areas requiring remediation. The values will be conservative because in the absence of leachability results, catastrophic dissolution will be used in the calculations. It is expected that additional soils will require remediation because of the conservatism in the calculations and the fact that the ground water protection standards are very low. For instance nitrate and tritium contamination is expected to be widespread.

Harlen Ainscough and Arturo Duran indicated that CDH and EPA were only concerned with the soils beneath the engineered cover (down to the mean seasonal high water table elevation) in the IM/IRA. Soils surrounding the SEPs would be addressed in the Phase II program.

Harlen proposed that the soils between the subsurface drainage layer and the mean seasonal high water table elevation be addressed if they are beneath the areal extent of the engineered cover. Remediation will not be driven by nitrate because it is not a RCRA contaminant. Remediation will not be driven by tritium which behaves like water and will be addressed in the Phase II project. The advantage of addressing tritium under ground water remediation is that additional data will be available to model the flow and transport. It is important to note that there is no available treatment technology to treat tritium at the concentrations found in the RFP ground water.

Harlen will investigate this approach with his colleagues at CDH and provide a status report at the next meeting.

Andy Ledford indicated that DOE would likely have to excavate a lot of soil if this CDH proposal is not adopted.

3) Roundtable Review Comments for Parts I, II, and III

Harlen Ainscough provided final CDH comments on Part III. This concludes the comments on Part I, II, and III.

Philip A. Nixon

Attachment 1
SP307033094:02
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AGENDA
TEAM MEETING
April 5, 1994

- Building 788 (ES)
- Waiver for Nitrate and Tritium Contaminated Soil (CDH)
- Applicable Ground Water Standards (CDH)
- Request for a Schedule Extension (EG&G)
- CAMU Boundaries (ES)
- Review Comments on the Phase II Work Plan (CDH)
- Open Issues
    - Disposition of Sand Bags in the SEP 207-B South (EG&G/ES)