

1) CDH Comments on the OU4 Draft Proposed IM/IRA-EA decision document

The CDH indicated that referencing the Phase II program as "additional hydrogeologic studies" is unacceptable because the Phase II program may also entail soil sampling, an evaluation of the Interceptor Trench System (ITS), and risk assessment activities. Harlen recommended that the term "Phase II additional field work" be used. ES will make this change to the document.

The CDH requested that either the Phase I IM/IRA-EA decision document or the Phase II work plan specify additional soil sampling outside the OU4 remediation boundary to determine whether any other additional soils will require remediation. Harlen Ainscough indicated that this additional sampling could be done as an additional component of the Phase I IM/IRA clean closure verification sampling or as a function of the Phase II studies. Harlen Ainscough said this was necessary to fully characterize the extent of contamination from the Solar Evaporation Ponds. CDH is concerned with both surficial and vadose zone contamination that is attributable to the OU4 source. Phil Nixon stated that since a volume of additional contamination was not known, it was very difficult to design the engineered cover with adequate additional capacity. Harlen Ainscough stated that remediation of the soils would not be required as part of the OU4 IM/IRA. DOE, EG&G, and ES will evaluate the extent of required additional sampling and propose a strategy to CDH/EPA with respect to when the sampling should be performed.

CDH commented that the original National Resource Damage Assessment comment had not been addressed in the IM/IRA-EA decision document. Phil Nixon responded that ES had prepared a lengthy response in the Part III comment response document. Harlen indicated that CDH had not received the ES comment response document. ES provided CDH and EPA with a copy of the Part III and Part IV comment response documents. Harlen will review the response for acceptability.

CDH specified uncertainty with respect to the use of the Rock Creek data set as site background data since its use at other OUs had been rejected. Phil Nixon stated that there could be a significant schedule set back to the program to re-calculate PRGs from a different data set. It was pointed out that there was no alternative background data. It was agreed that ES would write in the IM/IRA-EA decision document that the Rock Creek data was used as background data because it was the most appropriate available data set.

CDH specified that the approval of the remediation schedule should be deferred until final design is complete. Mark Austin proposed that the detailed logic diagram be removed from the IM/IRA-EA decision document, and only the summary schedule

should be retained. Arturo Duran stated that the document should contain a schedule based on the current scope of work that could be changed as a result in scope modifications. Andy Ledford stated that the proposed IM/IRA-EA decision document would contain a schedule with contingency that would be committed to unless the scope changed. Arturo stated that the EPA does not typically concur with schedules that include contingency. Scott Surovchak indicated that schedule contingency was important with respect to the way DOE establishes and manages construction projects. Andy Ledford requested that the EPA give DOE/EG&G an opportunity to provide the rationale and justification for schedule contingency. Arturo Duran agreed to consider a schedule with contingency analysis.

2) CDH comments on the Phase II work plan.

CDH deferred commenting on the Baseline Risk Assessment portion of the Phase II work plan because EPA and CDH are in the process of determining a joint risk assessment strategy that is not yet finalized. Each OU will meet to determine an OU specific implementation of the strategy. The OU4 meeting will take place soon. Phil Nixon stated that this could hold up the preparation of the Phase II work plan, and proposed that the Baseline Risk Assessment section be removed from the Phase II work plan until EPA and CDH concurred on a risk assessment strategy. A Technical Memorandum could be issued later concerning the Baseline Risk Assessment strategy. Arturo Duran stated that this should not be necessary. The EPA does not want the Baseline Risk Assessment to hold up implementing the field work and stated that the risk strategy should not impact the field sampling plan. It was discussed that this would be true as long as the correct data were collected. It was agreed that the identification of appropriate Data Quality Objectives, detection limits, analytical methods, ARARs, and exposure pathways is very important to ensure that the field sampling results will meet the needs of the Baseline Risk Assessment. ES will investigate the key Baseline Risk Assessment parameters that affect field sampling requirements while the EPA/CDH finalize the risk assessment strategy. If the strategy is not finalized in time to re-issue the work plan, then the EPA/CDH will opt to finalize the Baseline Risk Assessment component of the Phase II workplan via a technical memorandum.

3) Annexation of OU10 IHSS 176

Mark Austin and Phil Nixon discussed a proposal to annex IHSS 176 (excluding building 964) which has similar contaminants and concentrations as OU4. ES has proposed to extend the engineered cover into IHSS 176 to gain additional area for the engineered cover. ES also proposes to extend the engineered cover over Solar Evaporation Pond 207-C. Mark Austin explained that the purpose of the cover expansion was to optimize

the design by reducing the side slope and pyramid-like shape of the engineered cover. EG&G and ES went to Hanford to review the design of the engineered cover with the Hanford Barrier Research team. The Hanford Barrier Team strongly recommended that additional space be pursued to flatten the top of the engineered cover. This should maximize the effectiveness of evapotranspiration and reduce the amount of surface water runoff which could result in erosion.

Arturo Duran requested that DOE, EG&G, and ES assess the physical impacts that building 964 will have on the new proposed engineered cover configuration. Soils surrounding Building 964 would be remediated during closure of the building (RCRA Unit 24).

CDH and EPA will consider the OU4 annexation of IHSS 176.

4) Resolution of Concerns

Sludge Disposal as part of the IM/IRA

DOE sent a letter requesting a dispute resolution in response to CDH's denial to disposition treated sludge beneath the engineered cover.

Disposal of 788 Debris

CDH commented that Building 788 debris is not considered to be remediation waste. The resolution of this issue will occur as a component of the dispute resolution. It was agreed that the IM/IRA-EA decision document would remain unchanged until final resolution because the debris waste management flow diagram could support disposal beneath the engineered cover or outside of the OU4 IM/IRA.

Excessive Cover Design

The EPA/PRC has not issued written comments but still contends that the cover design is overly conservative and challenges the validity of the constraints and assumptions that the decision to retain the 1000 year cover was based on.

PRC recommends that a new site be identified for the disposition of the OU4 wastes in a hazardous waste disposal cell. The disposal cell could also be used for the disposition of wastes from other OUs. It should be noted that this alternative was discussed by the team in October of 1993 and was rejected since a certificate of designation (CD) would be required. There was a high level of uncertainty as to whether a CD would be

achievable. In addition, the siting and permitting of a new hazardous waste landfill would not be achievable in accordance with the IAG schedule. For these reasons, the alternative was not considered for the OU4 IM/IRA. However, Andy Ledford agreed to discuss the proposal with senior EG&G management and to form a task team to investigate the potential for an integrated site wide hazardous waste disposal cell for the Rocky Flats Plant. Andy Ledford will brief the team at the next team meeting with respect to the status of this parallel action item.

Scott Surovchak stated that siting a location for a RFP hazardous waste disposal cell may be complicated because DOE does not own the mineral rights under much of the RFP open space. Harlen Ainscough indicated that this facility would have to meet all the requirements of a hazardous waste landfill.

Arturo Duran indicated that this issue would likely become a component of the dispute resolution.

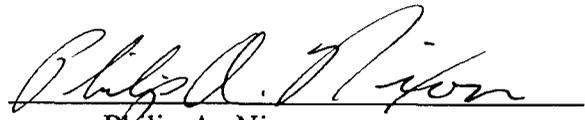
Vadose Zone Leachability

Arturo Duran stated that leachability testing was requested to confirm the results of the VLEACH modeling which indicated that there was not a contaminant leaching concern from infiltrating precipitation. EPA considers that the 1000 year engineered cover is not required since leaching is not anticipated, but wants actual data to support the modeling predictions. Phil Nixon indicated that EPA originally stated that the cover was overly conservative because the hazardous waste liners had contaminant of concern concentrations that were less than the Preliminary Remediation Goals (PRGs), and were therefore innocuous. The 1000 year criteria from the Hazardous Waste Landfill Citing Criteria were already achieved if the wastes were innocuous. Phil Nixon presented results from the draft proposed IM/IRA-EA decision document indicating that the recent results from liner samples in SEP 207-B North and SEP 207-B Center had COC concentrations that exceeded PRGs. Therefore, the liners are not currently innocuous and the 1000 year protectiveness criteria apply. Leachability testing will be required if a demonstration that the liners are innocuous is necessary. DOE/EG&G had determined that the costs of the additional sampling for the liners, debris, and sand/cement bags (SEP 207-B south) in combination with redesigning the engineered cover would be equal to or exceed the cost of the current conservative engineered cover design. The decision would result in the expenditure of similar amounts of money towards the protectiveness of human health and the environment instead of on additional sampling and analysis. The EPA questions the previous assumptions that all waste materials would have to be sampled and shown to be below PRGs to be consolidated beneath a RCRA-equivalent

engineered cover. The issue will be re-examined by both CDH, EPA and DOE. DOE will provide additional information/justification to EPA as necessary.

5) Plan for Near Term Actions/Milestones

EPA will not have their formal comments on the draft proposed IM/IRA-EA decision document for 2-3 weeks. It is necessary that a day-for-day schedule extension will be required in order to address the comments in the proposed IM/IRA-EA decision document. DOE will send a letter to EPA/CDH requesting a day-for-day schedule extension so EPA can comment on the documents.



Philip A. Nixon