

**Meeting Minutes  
Operable Unit Seven  
IM/IRA Strategies**

**December 19, 1995**

Introduction

Preliminary comments had been received on the Operable Unit Seven Interim Measure/Interim Response Action Decision Document from EPA (PRC) and CDPHE. Based on these preliminary comments it was apparent that the closure strategies presented in the IM/IRA Decision Document for Operable Unit Seven required modification. A meeting was held with EPA, CDPHE, DOE, Kaiser-Hill, RMRS and subcontractor personnel.

The following four modifications were presented to CDPHE and EPA.

Discussion of Management Strategy Modifications:

1) Delisting the F039 "contained in" groundwater

The draft IM/IRA Decision Document proposed delisting the F039 contained in groundwater daylighting at the seep by using EPA's Delisting through CERCLA Guidance. Since that time, draft guidance for determining whether a RCRA unit can be released from active management has been issued. The F039 "contained in" groundwater COCs would have to pass the CDPHE conservative screen. Since the F039 "contained in" groundwater COCs fail the CDPHE conservative screen, it cannot be delisted through the CERCLA process and the East Landfill Pond would have to be managed as a RCRA surface impoundment.

Delisting will not be pursued.

*All parties agreed.*

2) Fate of the East Landfill Pond

The draft IM/IRA Decision Document recommended leaving a portion of the East Landfill Pond in place. This recommendation was made to decrease the acreage of wetland mitigation required and also to maintain the potential Preble's Meadow Jumping Mouse habitat.

Since that time, the East Landfill Pond has been reclassified using the UFWS guidance as deep-water aquatic habitat and will not require mitigation, the fringe around the East Landfill Pond will still require mitigation. Traps were set around the pond for Preble's Meadow Jumping Mouse. No mice were captured after 400 trap nights.

To avoid costs associated with upgrading the East Landfill Pond to meet RCRA surface impoundment requirements and also to avoid the associated long-term operation and maintenance costs, it is recommended that the East Landfill Pond be drained, the sediments removed and placed under the cap, and the dam breached.

*All parties agreed.*

### 3) Point of Compliance

Based on contaminant transport modeling, wells 4087 and B206989 have been selected as compliance wells. The location ensures early detection of statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the entire waste management area to the uppermost aquifer (6 CCR 265.91) and is consistent with the current Site Groundwater Monitoring Strategy.

*All parties agreed.*

### 4) Groundwater Response Action

An alternatives analysis will be performed and presented in the IM/IRA Decision Document. The alternatives to be evaluated would control, minimize or eliminate, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface water, the land or the atmosphere (6 CCR 265.111).

This strategy is consistent with the Action Level Framework for Surface Water, Groundwater and Soils, and the Accelerated Site Action Plan.

*All parties agreed.*

### Other Discussion Items

CDPHE officially transferred comments on the IM/IRA DD. The document will be re-submitted to EPA and CDPHE in 59 working days (March 8, 1996).

EPA stated that they would provide information to improve the ecological and human health risk assessment sections. The information has been received and incorporated.

CDPHE asked whether OU 7 would be addressing groundwater remediation for OU 6. OU 7 had not considered the OU 6 contaminants but agreed to investigate the possibility of addressing them in the OU 7 management action.

CDPHE recommended that specific details of the cap would be better addressed during Title II Design and not in the IM/IRA DD.

EPA and CDPHE agreed that due to the extensive revision of the document, another review cycle prior to public comment was warranted.

As part of the regulatory "carve out," CDPHE transferred the lead for the OU 7 project to EPA.

An upgradient slurry wall we discussed as part of the remedy. The slurry wall would be evaluated in the next draft of the IM/IRA DD.

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