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

Subject: Submittal of April 26, 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 April 26, 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
		L. Ross w/o	Stoller
		B. Stephanus	Stoller
		MKV Chron w/o	
		OU7 Project File	

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Minutes for the OU 7 Landfill Closure IM/IRA/EA DD  
Technical Working Group Meeting  
April 26, 1995

The following topics were discussed:

**Agency Meeting**

DOE and EG&G met with CDPHE and EPA on April 25. The purpose of the meeting was to obtain approval of the basic strategy for closure of OU 7 and resolve potential problems before the Landfill Closure IM/IRA/EA Decision Document is completed. The Proposed Closure Strategy draft report was provided to CDPHE and EPA at the meeting.

DOE and EG&G presented the basic concepts of the closure strategy and discussed proposed modifications to the Seep Collection and Treatment Proposed Action Memorandum (PAM). EPA verbally approved proposed modifications to the PAM. CDPHE did not approve the proposed modifications because they do not fulfill the intent of the Pond Water IM/IRA dispute resolution, which was to collect leachate.

**Slurry Wall Accelerated Action**

EG&G and Stoller discussed how to convince CDPHE that the proposed modifications to the PAM for the slurry wall accelerated action make sense. Stoller will perform groundwater modeling to show the impacts of no action, the slurry wall only, and the slurry wall plus the cap on inflow to the landfill and outflow at the seep. Estimated volumes of leachate will also be calculated for each scenario, if possible. Stoller and TerraMatrix will determine how and where water in the leachate seep is managed after the cap is constructed.

The slurry wall accelerated action makes more sense than the seep collection and treatment system because it is consistent with the final remedy, reduces groundwater inflow and thus the volume of leachate generated, costs less, and does not require wetlands mitigation.

**Seep/Groundwater Control PAM**

The Draft Seep/Groundwater Control PAM will be submitted to CDPHE and EPA on June 8. In order to allow time to prepare transmittal letters, the document will be submitted to EG&G and DOE by May 25. The PAM will include a conceptual design, action-specific and location-specific ARARs, and possibly a working schedule. The Title II design, technical specifications, and CQA plan will be prepared separately from the PAM. Additional questions regarding the PAM are as follows (answers are in italics):

1. How important is overall length of report? - *Length is not as important because the EPA Project Manager is leaving and he was the person most concerned with report length. Preliminary Draft is about 26 pages plus two 10-page appendices. Cut Background (1/2 page), NEPA (2 page), PRG Appendix (10 page), discussion of presumptive remedy(1/2 page), and/or evaluation of alternatives (1 page)? - Cut the PRG Appendix. Shorten the Groundwater Modeling Appendix.*
2. "Removal" versus "remedial" action? - *Use "accelerated" action.*
3. F039 [listed waste] contained in groundwater ? - *Use "F039 RCRA-listed waste contained in groundwater."*
4. Number of copies of Draft to EG&G? - *20 copies.*

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5. Will the final be "Proposed Action Memorandum" or "Action Memorandum?" - Use "Proposed Action Memorandum, Draft Report" and "Proposed Action Memorandum, Final Report."

6. Get EG&G input on "contained in" text. From original PAM:

"The water surfacing at the seep (SW097) is composed of surface water and groundwater that have infiltrated the landfill waste. A waste determination of the seep was made based on historical data detailing wastes disposed in the landfill. According to the 1986 Waste Stream Identification Characterization (Rockwell International, 1986) report, multiple waste streams believed to contain Resource Conservation and Recovery Act (RCRA)-listed hazardous wastes were disposed in the Present Sanitary Landfill prior to 1986. From a RCRA perspective, the surface water [and groundwater?] containing F039 hazardous waste constituents is a "contained-in" waste. This waste must be handled as a RCRA regulated hazardous waste, with the EPA waste code F039, when the seep water is actively managed (e.g., in piping, a tank, or a container)."

*Use "The water surfacing at the seep (SW097) is composed of surface water that has infiltrated the landfill waste and groundwater inflow...From a RCRA perspective, the groundwater containing F039 hazardous waste constituents is a "contained-in" waste. This waste must be handled as a RCRA-regulated hazardous waste until it is demonstrated that the groundwater no longer meets any of the criteria under which the waste was listed and no other factors are known that would make the waste hazardous."*

7. Trenches excavated during geophysical investigations collapsed. Get more information to support using slurry walls which will not collapse. [Depth, was shoring used?...] ]

*As part of the Seismic Investigation Program in 1994, a trench was excavated across an inferred fault north of the landfill to characterize the fault zone and evaluate the possibility of recent movement along the fault.*

*The trench was excavated to depths of 20 feet through alluvium and bedrock. Large blocks of claystone bedrock caved into the trench in fracture zones associated with the fault. The trench walls were subsequently reinforced every 4 feet using hydraulic shores. Slope failure occurred when the shores were pulled out of the trench.*

*Because of the clay content of the matrix, the alluvial material held better than the bedrock. Caliche zones in the alluvium also appeared to be fairly stable. However, some caving of alluvial material occurred at the west end of the trench. Heavy equipment was operating in this area and may have caused the slope failure.*

*Because slope failure occurred primarily in bedrock, this information will not support building a slurry wall in the alluvial material.*

8. Level of detail necessary for waste management considerations:

"Excavated waste materials and excess slurry will be disposed at the Present Landfill." -or-

"Characterization of the excavated soils will be based on field screening. If verified field screening results are below background as defined in Field Operations SOP FO.08, Handling of Drilling Fluids and Cuttings, and FO.16, Field Radiological Measurements (EG&G 1992), residual soil will be disposed as clean fill onsite in accordance with Field Operations SOP FO.23, Management of Solid and Sediment Investigative Derived Materials (EG&G 1994). These materials will be dispersed and leveled within the disturbed area and reseeded following guidance from the Rocky Flats Ecology Department. Bedrock cuttings, if any will be covered with alluvial materials.

If verified field screening results are above background as defined in Field Operations SOP FO.08 and FO.16, residual soil will be drummed at the construction site in accordance with Field Operations SOP FO.08, labeled in accordance with Field Operations SOP FO.10, Receiving Labeling and Handling

Environmental Materials Containers (EG&G 1992) and analyzed. Results of this analysis will be used to characterize the drums.”

*Use “Excavated waste materials and excess slurry will be disposed at the Present Landfill.”*

9. Is “Evaluation of Alternatives” and discussion of “No Action” necessary? - *No, but leave it in if it is already written.*

10. More information from EG&G on actions being taken with regard to the Preble’s Meadow Jumping Mouse. Existing text is as follows:

“OU 7 has been identified as potential habitat for Preble’s Meadow Jumping Mouse, which is a candidate for listing under the Endangered Species Act. Mouse habitat is under investigation under the direction of the US Fish and Wildlife Service. DOE will begin trapping the Preble’s Meadow Jumping Mouse at OU 7 in May/June 1995[?]. Habitat mitigation will be performed as needed.”

*The site was inspected for threatened and endangered species on October 12, 1994 in the area of the proposed slurry wall, and the site was cleared for drilling borings for the Phase II RFI/RI.*

11. Is “NEPA” necessary? - *No, but leave it in if it is already written.*

12. Include general information about when/where public comments will be accepted? - *Yes. EG&G provided this information to Stoller.*

**Action Items**

- 01-210 Completed.
- 211 Research EPA guidance on applying for ARARs waivers (S. Franklin, Stoller). In progress.
- 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).
- 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).
- 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.

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- 235 Keep current on Pond Water IM/IRA issues (L. Peterson-Wright, EG&G).
- 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).
- 239 Determine if the following items should be included in the Seep/Groundwater Control PAM: schedule for implementation, header on each page, sign-off sheet, NEPA environmental impacts (L. Peterson-Wright, EG&G). A list of actions and proposed completion dates should be included. Each page should have the header for uncontrolled documents. A sign-off sheet should be included with the cover letter. NEPA environmental impacts should be discussed briefly. Completed.
- 240 Call DOE, EPA, and CDPHE about the May 3 site visit to observe construction of a slurry wall at a site north of Denver (L. Peterson-Wright, EG&G). Completed.
- 241 Arrange review of conceptual costs, including overhead percentage, contingency percentage, and health and safety costs (L. Peterson-Wright, EG&G). In progress.
- 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." 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).
- 245 Provide EG&G with a list of environmental impacts to be addressed in the Environmental Assessment section of the IM/IRA/EA Decision Document (M. Vaag, Stoller).
- 246 Check OU 7 database to determine if all lab qualifier columns were captured in the data extraction (J. Jankousky, Stoller). All qualifiers were captured and all data were validated. 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).
- 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 Perform groundwater modeling of north slurry wall and north slurry wall combined with landfill cap (J. Jankousky, Stoller). The groundwater flow system was modeled using MODFLOW for three scenarios: (1) no action - total inflow is 1.9 gpm, infiltration is 0.8 gpm,

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groundwater inflow is 1.1 gpm; (2) north slurry wall - total inflow is 1.3 gpm, infiltration is 0.8 gpm, groundwater inflow is 0.5 gpm; (3) north slurry wall and cap - total inflow is 0.4 gpm, infiltration is 0.01 gpm, groundwater inflow is 0.4 gpm. Completed.

- 252 Compare mean concentrations of all analytes in groundwater downgradient of the landfill to ARARs (J. Jankousky, Stoller). In progress.
- 253 Change references in ARARs tables from federal regulations to state regulations (S. Franklin, Stoller).
- 254 Obtain language on PQLs from L. Brooks (L. Peterson-Wright, EG&G).

**Next Meeting**

There will be a field trip to observe construction of a slurry wall at 9:30 a.m. on May 3, 1995. Meet at the Cooley Gravel Quarry on 88th Avenue west of I-76. Geo-Con, Inc. is contracted to build the slurry wall and will describe the process and answer questions.

The next meeting will be at 10:00 a.m. on May 10, 1995, in the small west conference room at EG&G. The topics of discussion include the slurry wall accelerated action, Leachate Control PAM, and Landfill Closure IM/IRA/EA Decision Document.

**List of Attendees**

<b>Name</b>	<b>Organization</b>	<b>Phone</b>
Mary Eisenbeis	Stoller	546-4474
Tom Lindsay	EG&G	966-6985
Peter Martin	EG&G	966-8695
Laurie Peterson-Wright	EG&G Project Manager	966-8553
Myra Vaag	Stoller Project Manager	546-4417

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Seep/groundwater Proposed Action Memorandum

1. How important is overall length of report? Preliminary Draft is about 26 pages plus two 10 page appendices. Cut Background (1/2 pg), NEPA (2 pg), PRG Appendix (10 pg), discussion of presumptive remedy(1/2 pg), and/or evaluation of alternatives (1 page)?
2. "Removal" vs "remedial" action?  *accelerated*
3. F039 [listed waste] contained in groundwater ?
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6. Get EG&G input on "contained in" text. From original Pam:

*see  
SW  
Ground*

*6/14/95  
6/15/95*

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*If verified field screening results are above background as defined in Field Operations SOP.08 and FO.16, residual soil will be drummed at the construction site in accordance with Field Operations SOP.08, labeled in accordance with Field Operations SOP.10 Receiving Labeling and Handling Environmental Materials Containers (EG&G 1992) and analyzed. Results of this analysis will be used to characterize the drums.*

9. Is "Evaluation of Alternatives" and discussion of "No Action" necessary?
10. More information from EG&G on actions being taken with regard to PMJM.

*OU 7 has been identified as potential habitat for Preble's Meadow Jumping Mouse, which is a candidate for listing under the Endangered Species Act. Mouse habitat is under investigation under the direction of the U.S. Fish and Wildlife Service. DOE will begin trapping the Preble's Meadow Jumping Mouse at OU 7 in June/July 1995[?]. Habitat mitigation will be performed as needed.*

11. Is "NEPA" necessary?