

DRAFT

MOUND PAM COMMENT RESOLUTION December 11, 1996



000107996

Wayne Sproles presided over the meeting.

Address comments:

1. Internal document differed to KH/DOE. Recommend provide data sets that we used in developing the data, as opposed to documents.

Question: Was SVE under tech memo?

Response: I can find out.

2. Additional detail for rad field screening. Did make a change to the PAM 2.3.2, deals with rads and soils. 3.2.1 rad monitoring will be performed IAW RFFDS. Three times background target actual sampling will be covered in the SAP the first week in January. Soils will be segregated.

Mark Wood: Anything greater than three times will be a stop work.

Tim Rehder: Rather put some thought into what we are going to do to stabilize.

Marla: We can put into the FSAP.

3. Error on the calculations on Tier I ratio. That has been corrected.

4. Additional detail. Thought map showed the precise location. This was described in Section 3.2.

Marla: Look at Figure 2-1. Would like to take you out to the site so you can have a better feel.

5. Use of air sampler.

Carl: Two samplers in the mound area. Suggest weekly analysis.

Ann Tyson: Jerry Anderson will explain.

Dick Fox: When I ran the analysis on the samples, and right next to the project, they found during the excavation that levels were up. Concern that is the point when samples need to be taken. Compared to the other samples, it was only within that area.

Ann Tyson: You are just looking at one side of the site. I will go back and see what is going on. Order of Magnitude increase all the way across. What we have done on the project, we have high balls set up that is what we ran, what we are looking at is the impacts; we never say exceedance at T3/T4. We have to look at the controls and look at the parameter. We never exceeded any regulator standard. What are we asked to be done here, we are doing protective measures.

ADMIN RECORD

1113-A-00047

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Fox: Don't have any information on monitoring controls. During the time excavation was taking place. Uranium levels will be high in the mound area. More apt to occur during excavation.

Jerry Anderson: No, less than what we handled.

Rampe: What type of monitoring will be sufficient? What project specific High ball samplers and analysis daily should give us a good idea if we are hitting any spikes. Isn't that sufficient? These individual stages are routinely sampled. Significant degree of expense to the project. We have daily monitoring and parameter sampling.

Fox: I would like to see the document on the high ball?

Jerry: We can show them to you. We have high balls/low balls, cu ft samples.

Mark Wood: Using glass fiber.

Ann Tyson: Walk Dick through.

Rampe: It is difficult to tell from this to tell that program is in place.

Mark Wood: Details will be in the H&S Plan.

9. Performance standards. TDU performance standards are LDR numbers.

Carl: Performance standards don't address the issue on the waste. The way we have handled that in the State is a risk based LDR treatment standards don't address

Jean Lillich: They address listing for LDR purposes but it is still a listed waste. Most like under RCRA you would have to put that in.

Ann Tyson: Will pull permit at Ryan's Pit. Did use universal treatment standards here. May be look at shipping materials.

Hopi: Should have seen data flagged PCB way ahead hits of 2 PPM after treatment.

Jean: T3/T4 was in a long time waste.

Hopi: TCE level was 9 PCE level was higher than what we proposed in this PAM>

Ann Sieben: Ten foot of the universal treatment standard than low level TD might not be the proper technology.

Jean: Some numbers we got was a pretty safe number, I wonder if I got a complete set?

Hopi: All of the samples were labor process verification.

Ann Sieben: Ryan's Pit, T3/T4, and mound site, you need to look at where the site is.

Jean: Thought you guys were already meeting it; only because it was a listed waste.

Ann Sieben: With the whole PAM and the new RFCA; what we agree on will be for the whole site. Trying to protect surface water. Treat to LDR and ship off. Don't know if that is the prudent thing, but need to evaluate now. Don't want to approach any of our VOC levels until we have this issue resolved.

John Schmuck: When everything is by the PPM range.

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Hopi: There is another concern. .6 Level is between low and medium organic concentrations. Lab doesn't know it will have impact on sampling costs.

Schmuck: Looking at individual data points and looking at criteria for the waste stream. Set a higher number for the data samples and look at it. It is the waste stream we are looking at. Any given data point.

Marla: T3/T4 was 6.

Tim Rehder: What would be the possibility for carbon tet down to 1/3 of that. Based on the numbers the State has used for delisting. We can leave the rest at 6; take the carbon tet down to 2.

Hopi: How has carbon tet been listed; we haven't seen it on the site. Part of the organic that was in those drums.

Tim: We have already agreed that it can go into the soil. What I am trying to do is cover ourselves; RCRA people don't like for us to put liquid waste into the ground.

Mark Wood: 2 PPM for T3/T4.

Marla: Carbon tet 2; TCE 4.

Hopi: That is just the basis.

Schmuck: I can fax a justification.

Marla: We will look at the data again.

Tim: Target levels, however, it could go back into the ground.

Schmuck: We have to get below treatment standards. Then we would have to invoke CAMU.

Rampe: Can the equipment meet those levels? Transmit your rationale for proposing those levels.

Ann Sieben: Is this defensible and logic in the language? It was 20 deal with VOCs. Establishing a trail with different numbers every time.

Rampe: Why are we doing this?

5. OVA is a field screening tool to help me make decisions in the field. It is to give me a guide.

Wind speeds: In the PAM, we have referred to the OPS procedure. We are evaluating the site procedure, which clearly operates under the plant procedure. We have a more conservative figure; we may conform to the site procedures.

Marla: F01 will be modified. Wind speeds of 15. The plant makes announcements at 20 whether you will continue to work. Winds of 34-45, you will shut down work. We might possibly incorporate that.

Ann Sieben: Do you want these values printed in the PAM? The more detail we put into the PAM, the more it changes the purpose the PAM has. This is what the site is working to. Best to put in the H&S Plan.

Marla: It is at the jobsite.

6. You will get the SAP the first week in January for review.

7. Estimate on groundwater. The PAM isn't the place to put this type of information.
1 1/4 groundwater - 25 gallons a day.

Mark Wood: 250 gallons for a ten-day period. Depends on site conditions during the length of the project. Plant procedure for management of incidental waters.

8. Time frame we will be stockpiling the soil. Treat the same time we are excavating. Completely finish excavation prior to treatment. A month before we start treating. Looked at doing concurrently, but with the heavy equipment running we have limited area between stockpile and actual treating; it is too congested.

Marla: It would reduce safety hazards and have a smaller volume. Sitting up TD unit and treating unknown volumes of soil will be turning over to the contractor.

Tim: If you can manage with tarp, that will be OK. If we have soil more than 90 days, then they become an ARAR.

Marla: It won't be 90 days; 30 at the longest. A tarp will be addressed same as T3/T4; we will use tie downs. It will be monitored also. We will keep an eye on it.

10. Sampling was already addressed in item 2.

11. Characterization methods how do we handle condensate? Hazardous waste will be in a perm then shipped offsite.

Mark Wood: Managed onsite as hazardous; acquisitive phase will be sent directly to B891.

Schmuck: RCRA ARARs will be applied.

12. Answered with item 9.

13. LDR addressed in item 9. We will qualify as a waste water.

Hopi: In the draft SAP, do those analyses.

Jean: Will qualify as waste water C.

14. CAMU waste cell issue.

Tim: No need to call it a CAMU.

Schmuck: You become real familiar; it is a broad document; give RCRA program retain options.

Tim: Talking longer term storage; don't want to call it a CAMU. Let's leave this term out of this.

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Marla: Federal register is ARARs for CERCLA and RCRA hazardous waste. Temporary waste cell.

Marla: Don't call it anything; just describe it.

Not illegal before, you aren't illegal now.

15. Table 5.1, we will modify that requirement.

16. Table 5.2, location of CSFS. Same location; same purpose in T3/T4 project. Put in the FSAP.

17. Temporary unit storage. Number and types.

Jean: Provide more of the TVP was in the Ryan's Pit just so people know that unit is provided. Not clear on the vendor that will be used; we will use carbon steel trucks; can't turn your numbers. Polly tanks for stored water don't go in the PAM. Field Implementation Plan.

18. Decon procedures covered in the SAP waste water.

19. Marla: This is a source removal; we are not remediating the plume. We are not going to do plume monitoring.

Jean: Concern what to see groundwater numbers before end effect.

Ann Sieben: That is part of the site water, defer question, call me directly.

Marla: Our disposition to this comment; this is part of the ongoing groundwater title and they can get information there.

Mark Wood: SW59 is also planned to be done this year.

Marla: Rate of movement through the soils before something shows up.

Tim: If it is not covered within the integrated groundwater monitoring plan, Eliz should make a proposal if some short-term sampling

Ann Sieben: A difference in this program will not be monitoring in our program.

Rampe: Bottom line: There are other means out there that would be more appropriate.

Marla: We are all in agreement, we will let Ann Sieben talk to whomever needs to.

20. Air quality control. Total VOC - numbers were corrected.

Jean: State wanted sentence it was going to affect levels.

There is no details about the TD process or reference appropriate documents.

Wayne: I will reference. Waste identified hazardous waste or LLMW will be shipped offsite to an appropriate place. Proper storage.

Need to do a lot of contingency plans.

Ann Sieben: The PAM is not the document to be taken into the field. It is a field approach.

Rampe: If people wanted to see the field implementation plan, they can see it.

Ann Sieben: Don't see any problem with saying you can provide more clarification.

Added comments:

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1. Acronyms have been taken care of.

2. *We would like to review and comment on the Sampling and Analysis Plan, when it becomes available. In general, water from pit dewatering and entrapped storm runoff within the Mound Area should be tested for VOCs and radioisotopes in addition to the standard incidental water parameters prior to determining final disposition of that water.*

I don't know why. We do have a site procedure.

Marla: Analysis after treatment, we don't need all of the details before it goes into treatment.

3. *What is the plan if unexpected levels of radionuclides are found in the soil?*

Covered that.

4. *The PAM indicates that contaminated groundwater and/or surface water will be treated at the 891 treatment plant and released in accordance with the discharge criteria what specifically are those criteria?*

OU1/OU2 IM/IRA most stringent.

5. *It appears that the proposed culvert extension for the Central Avenue Ditch will prevent contact between Central Avenue Ditch water and water associated with the excavation activity. We would recommend, however, that VOCs be tested once at SW022 at the first occasion where the Ditch is flowing and the excavation is well underway.*

Sampling plan referenced it will be done by an outside organization. Existing sampling protocol; part of the IM/IRA. We will confer with the other groups to make sure that is done.

6. *What is the capacity for the plastic lined ditch surrounding the stockpile? Will it adequately handle a large storm event?*

We will evaluate it. We will design it; it will be designed as part of the project.

7. *We would like to see a summary of the baseline monitoring data for SW022 and GS10 and possibly this could be included as a table in the Sampling and Analysis Plan.*

We don't have a VOC data, I will give them what we have. Comments to the rad numbers next Wednesday.

Comments to Cap ER - Rampe

Response:

Comments on Monday.

Comments to reading room on Wednesday.

Schedule

Public comment January 14.

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Setup for treatment system is left out granulated activated carbon. Public based on air emissions based on tier. Met all regulatory requirements. Knock out 75% of the VOCs we will be pre-heating the HEPA. Releasing 400 pounds of VOC to the atmosphere. We will be releasing less than a pint an hour.

pre heaters - propane chillers hard wire.

SOW to go out to the TD.

Detail will not be described in detail in our PAM.

Rampe: Cost estimates: PAM is not appropriate method. A BOE in MOD 1 reasonable document.

Ann Sieben: Reasonable.

Marla: A PCB for this project will be going out.