1B100

ENGINEERING-SCIENCE, INC. a unit of
PARSONS ENVIRONMENTAL SERVICES, INC.
1700 Broadway, Suite 900 Denver, Colorado 80290
phone: (303) 831-8100 • telecopy (303) 831-8208

MEETING NOTES

TO: Distribution **DATE:** August 2, 1994

FROM: Philip Nixon **PROJECT:** Solar Pond IM/IRA

MEMO #: SP307:080394.02

ATTENDANCE:

Phil Nixon
Andy Ledford, EG&G
Harlen Ainscough, CDH
Arturo Duran, EPA
Frazer Lockhart, DOE
Steve Howard, DOE/SAIC
Shaleigh Whitesell, PRC
Scott Surovchak, DOE

DISTRIBUTION:

Randy Ogg, EG&G
Michelle McKee, EG&G
K. London, EG&G
Steve Keith, EG&G
Steve Cooke, EG&G
Toni Moore, EG&G
R. Popish EG&G (Admin. Record) (2)
Peg Witherill, DOE/SAIC
Jeff Ciocco, DOE
Jesse Roberson, DOE
Bob Siegrist, LATO
Alan McGregor, ERM
John Haasbeek, ERM
Marcia Dibiasi, IGO
Joe Schieffelin, CDH
Shaleigh Whitesell, PRC
L. Benson
P. Breen
A. Conklin
B. Cropper
K. Cutter
W. Edmonson
T. Evans
H. Heidkamp
R. Henry
M. Hill
P. Holland
S. Hughes
R. McConn
D. Myers
A. Putinsky
R. Stegen
S. Stenseng
R. Schmiermund
B. Glenn
R. Wilkinson
T. Kuykendall
Central Files

SUBJECT: Weekly Status Meeting

(I:\PROJECTS\722446\CORRESP\08039402.WPF\08/08/94)

1) Discussion Concerning the Outcome of Dispute Resolution Reevaluation

It was discussed that a tentative date of August 23. 1994 has been established for a meeting between the DOE, CDH, and CDPHE senior management for the working group to provide a briefing of the outcome concerning the dispute resolution reevaluation. The meeting will be held at the EPA's office at 9:00 am until noon. It was discussed that the focus of the meeting would be to present the technical merits of the proposed approach. It was noted that the group would be ready to discuss the regulatory rationale for why the approach is appropriate.

Andy Ledford and Steve Howard presented a draft document intended to capture the results of the dispute resolution reevaluation. The document will be modified for distribution to the primary dispute resolution participants on August 4, 1994. The following items summarize the discussions that will lead to the modifications in the document. It was agreed that the 11 items identified during the dispute resolution meeting held on July 7, 1994 may be re-organized to capture the logical method by which they were resolved.

1) Evaluation of Site Conditions and Strategies

Frazer Lockhart asked Harlen Ainscough and Arturo Duran if there were any other technical issues that needed to be reevaluated. It was agreed that there were no additional technical areas that needed to be reevaluated (outside of the upcoming geotechnical results and other potential issues that would be studied during title design). It was agreed that the document would be modified to identify the decisions that resulted from the design basis reevaluation. This is largely the fact that the proposed design was upheld. Arturo Duran requested that the document list the driving factors that resulted in the decision to retain the 1000 year engineered cover design which incorporates a low-permeability layer. The factors include:

a. Consolidation of uncharacterized materials,

b. Protection of ground water (especially due to the inclusion of sludge),

c. The goal for long term durability of the final action,

d. DOE's analysis that long term durability could be achieved at a relatively small increase in cost, in addition to a higher probability of public acceptance.

It was noted that infiltration abatement was not the key driver for the installation of the 1000 year engineered cover design. Arturo Duran indicated that the Colorado Part 2 Hazardous Waste Landfill Siting Criteria are fully complied with by the design, but that these criteria are not driving the selection of this design.

2) Additional Evaluation of Cap Parameters

It was agreed that the document should be expanded to capture that fact that the expanded footprint of the engineered cover was determined to provide adequate capacity for consolidating the materials that DOE wished to disposition beneath the engineered cover. It was noted that the cover design and footprint would be optimized/modified during the title design process.

3) Status of Sludge as a Remediation Waste

The document will be modified to indicate that DOE will prepare the proposed IM/IRA-EA Decision Document to disposition sludge beneath the engineered cover. Harlen Ainscough stated that this was a significant issue that would take time for the CDPHE to review and respond to. Harlen stated that DOE was within their authority to propose any IM/IRA that they thought was appropriate, and that it was then up to the agencies to review the IM/IRA-EA Decision Document to determine whether the proposed IM/IRA was acceptable. Frazer Lockhart stated that this approach was not the intent of the summer 1993 dispute resolution which created the working group approach so that the DOE, CDH, and EPA had internal agreements and could stand united when the proposed IM/IRA was submitted for public review. Harlen Ainscough responded that including sludge in the IM/IRA was not addressed in the original dispute resolution (summer 1993), and that the CDH could not "approve" the concept at this time without internal consideration. Frazer also indicated that if the CDH rejects the proposed IM/IRA-EA Decision Document (including sludge), that there would be some impacts to the implementation schedule because the engineering details would be required to change. Harlen Ainscough commented that impacts would be minimized if a non-sludge incorporation baseline were resumed.

4) Inclusion of Sludge as an Enhancement

It was agreed that the document would be modified by adding the factors that the working group determined would be important for justifying enhancement:

a. schedule enhancements
b. cost/budget enhancements
c. waste management enhancements
d. acceptable or enhanced performance

5) Physical Form of the Backfill

It was discussed that the document would be clarified to state that the engineered cover design provided an adequate capacity for the sludge.

6) Impacts of DOE Order 5820.2A

Arturo Duran provided clarification that the DOE Orders are not ARARs. It was also clarified that even though the 10 CFR 61 Nuclear Regulatory Commission (NRC) regulations may apply to DOE remediation projects, but the criteria are expected to be readily met by the DOE proposed IM/IRA.

7) Cost-effectiveness of on-site and off-site disposal

It was agreed that the magnitude of the cost difference would be included in the dispute resolution document so that the information would not be lost or forgotten.

8) Risk Management Associated with Issue #7

There will be no modifications to the document with respect to this issue

9) Off-site vs On-site Disposal Facility

There will be no modifications to the document with respect to this issue

10) Prioritize Waste Streams

There will be no modifications to the document with respect to this issue

11) Use of IHSS 101 vs other On-site CAMU

Frazer indicated that the resolution to this issue should state that the group acknowledged long term cost and waste management benefits to this alternative, but it would not be implemented at OU4 because:

a. It would postpone the SEP closure for 5-10 years.

b. It would cause a true interim closure for the SEPs with subsequent final closure when the integrated facility was complete.

c. The hillside and buffer zone soils, as well as the sludge, would not be remediated as part of the Phase I IM/IRA.

Harlen Ainscough indicated that the Part III IM/IRA should be modified to include the evaluation of the integrated site disposal facility and state that it was not evaluated in detail because it did not meet the IAG schedule requirement. **ES will include this in the IM/IRA-EA Decision Document.**

12) Ground Water Control with a Slurry Wall

There will be no modifications to the dispute resolution summary document with respect to this issue.

2) Review of the ES Decision Summary Document

Harlen Ainscough reviewed the ES Decision Summary Document that was compiled to summarize the key agreements that were made during the team meetings. Harlens specific comments were discussed. As a result of this discussion, ES will revise certain items for clarification, add notes stating which decisions were superseded, and add new decision boxes to capture the results of the dispute resolution reevaluation. Important discussions on these agreements are noted below:

1) A new decision box will be added to clarify that CDPHE considers that soils exceeding Preliminary Remediation Goals trigger the Part II siting requirements for Hazardous Waste Landfills.

2) A new decision box will be added stating that the DOE has agreed to characterize SEP 207-C for the purpose of obtaining information that may be useful for finalizing the title design.

It should be noted that the final design basis decision box will not be completed until the slurry wall issue has been resolved.

3) Status to Date on the Upgradient Vertical Ground Water Control System Analysis

Phil Nixon reported that the ground water control system options analysis was in progress. The conceptual design would be established for the vertical control alternative as a U shaped slurry wall along the west, south, and east of the SEP 207-A and the B series SEPs. The slurry wall would be installed in conjunction with an upgradient collection trench that will tie into the existing ITS system. The slurry wall would be constructed from bentonite, and the collection trench will be filled with gravel. Geophysics data indicates that competent bedrock exists at a level of 45 ft below the surface. It is important to tie the system into competent bedrock so that leaks do not develop. It has been determined that open trench construction techniques are not practical due to the fact that the trench would interfere with numerous site operating facilities and active utility lines. ES is currently investigating trenching techniques with potential vendors that could be used to install the system without opening large excavation trenches. This information and the results of the analysis are scheduled for completion on August 8, 1994.

Philip A. Nixon

(I:\PROJECTS\722446\CORRESP\08039402.WPF\08/08/94)