



100-D/H Remedial Investigation/ Feasibility Study /Proposed Plan

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100-D/H RI/FS/PP

- Received Draft RI/FS/PP on December 14, 2012
- Submitted comments to DOE on March 12, 2013
- DOE and Ecology are meeting to start the resolution process

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- Good points
 - Fairly well written
 - Results of borehole data didn't find any smoking guns.

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Issues

- Selection of Contaminants Of Concern/Contaminants Of Potential Concern (COC/COPC)
- Modeling parameters*
 - Basis for modeling parameters not in document
 - Infiltration rates with plant community growth timelines
 - Ecological Values
 - Not running sensitivity analyses
- Screening potential COPC too soon in the process

*PRGs will remain in question until Ecology is comfortable with the modeling .

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Framing Questions -

- *Do you expect that the Proposed Plan will provide an adequate cleanup of the surface and groundwater at 100-D/H?*

The preferred alternative would provide adequate cleanup for the COCs that have currently been identified.

The preferred alternative (MNA) for nitrate and strontium-90 is questionable.



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- *Would you have chosen a different 100-D/H Alternative?*
 - New Alternative - No
 - Different Preferred Alternative – No
 - Just not sure if the cleanup values are appropriate which is dependent on the modeling.
 - Also questioning the MNA for nitrate and strontium-90

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- What part of the Proposed Plan do you have /had issues with?
 - See slides on issues.

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- How could this RI/FS and Proposed Plan have been made better?
 - Selection of COC/COPCs - Broaden the COC/COPCs based on the contaminants appearing in the samples.
 - Modeling parameters*
 - Basis for modeling parameters not in document – Include in the RI/FS so that Ecology can review and verify the basis for the model.
 - Infiltration rates with plant community growth timelines – Basis for the infiltration rates was not apparent.
 - Eco Values – Include changes to the Eco Tier II in RI/FS
 - Not running sensitivity analyses
 - Screening potential COPC too soon in the process

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- Will there be a push from EPA and Ecology to go to final cleanup standards rather than accept interim levels?
 - The cleanup levels that result from this RI/FS/PP will be used because the process evaluates the information accumulated to date and uses this information to decide on cleanup levels.

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- *Can you explain why there seems to be haste to transition 100-Area Operable Units to Long Term Stewardship (LTS)? Why not leave it in remediation status?*
 - The long term stewardship program is an administrative process within DOE and isn't a CERCLA procedure.
 - Ecology is not pushing for the operable units to go to LTS.
 - If remedial action is complete then it is DOE's process to move it from EMS to LTS.

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- Questions