

Feb. 22, 2000 Meeting Minutes

Date: 2/22/00
To: File
Cc: Mike Alcorn, BLM
Eileen Olson, ADEC
From: Joe McElroy, HLA
RE: Red Top

This memo summarizes a February 22, 2000 meeting between Mike Alcorn (BLM), Joe McElroy (HLA), and Eileen Olson (ADEC) to discuss, 1) ADEC comments to the *1999 Site Characterization Report, Red Top Retort Site (1999 report)*, and 2) direction for bringing the site to closure. The following summarizes each issue discussed and the agreed resolution.

- **Risk evaluation.** In comments to the 1999 report, Eileen referred several times to a forthcoming Risk Evaluation. Although this was discussed in a June 1999 meeting, procedures for risk evaluation are not defined, and guidance is not available. HLA/Wilder's scope of work for 1999 was to provide justification for site closure based on the data set (including 1999 data).

Eileen agreed that there is no procedure or guidance for risk evaluation. She indicated that she would like to see is a complete summary of data collected to date. The summary would include 1994 Quest Environmental data, 1998 HLA/Wilder soil, sediment, and surface water data, and 1999 HLA/Wilder soil data. The associated text would be presented in a letter format and would summarize the complete data set and summarize conclusions.

- **Homogeneity of soils.** Eileen commented that the range of results from in situ soil samples collected around the former retort site are not distributed evenly and vary from 108 mg/kg to less than 1 mg/kg, suggesting site contamination is not homogeneous. Eileen indicated because soil contamination is not homogeneous, there may be contamination below and/or outside the existing sampling grid.

I explained that samples were collected from locations in accordance with approved work plan. Results from shallow (1 to 2 feet below ground surface) samples collected outside the lined area do not exceed inhalation standards. I also explained that because total mercury analysis is performed in the lab with small sample (approximately 1-ounce), significant variability can be introduced into results, and therefore non-homogeneity of site mercury concentrations is likely exaggerated. I explained that we thought the existing data set adequately characterizes the site. Eileen indicated that a determination of sample grid completeness can not be made without seeing the entire data set together on one figure. Data that can be added to the Figure showing in situ results in the 1999 report include: one sample submitted for total mercury analysis from a sampling grid under the former DRO stockpile, one sample collected in 1998 from fill placed over the liner, and 1994 Quest data from soil samples collected in the area.

- **Additional liner and backfill.** Eileen requested that BLM place additional liner and fill over an area surrounding a sample location outside the lined area (southeast side) that had a total mercury result of 12 mg/kg in her comments to the 1999 report.

Because the result is below inhalation standards (18 AAC 75, Method 2, Inhalation Cleanup Level of 18 mg/kg), Eileen indicated additional liner and fill for was only a suggestion for BLM's protection, and it was not a requirement.

- **Statistical Analysis.** Eileen requested that Quest data be incorporated with HLA/Wilder's 1998 and 1999 retort site data for statistical analysis of an upper 95 percent confidence level. HLA/Wilder was concerned with this approach, because in 1998 ADEC did not consider Quest data representative of undisturbed soil.

Eileen indicated that only the Quest field screening data was invalid, and that the in situ analytical samples were valid. We pointed out that the current HLA/Wilder data set should be representative, and there would be no need to include this data in the statistical analysis. Eileen agreed, and said we would only need to include the data in the data summary letter.

- **Hydrocarbon contamination.** Eileen commented that the 1999 report does not clearly show that the likely area of hydrocarbon contamination was sampled. She requested field notes be provided to ADEC so sampling locations could be evaluated.

I explained the logic for establishing the sample locations identified in our approved work plan. Eileen understood the logic and requested that the explanation be presented in the summary letter.

JWM