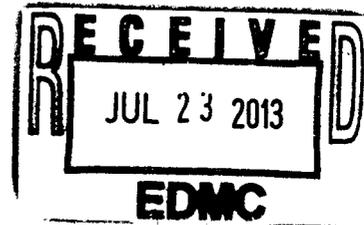


MEETING MINUTES for Revision of RPP-9937	
Date of Meeting: 6/12/2013	Location: Ecology/Room 3A
Preparer: A.G. Miskho, WRPS	Time: 2:00 – 4:00
<p>Attendees:</p> <p>Jim Alzheimer, Ecology  Jared Mathey, Ecology  Jeff Lyon, Ecology  Jeremy Johnson, ORP  Mary-Beth Burandt, ORP  James Lynch, ORP  Mike Sheridan, WRPS  Tony Miskho, WRPS  Jeff Luke, WRPS  Jeff Voogd, WRPS  John Guberski, WRPS</p>	
<p>Minutes:</p> <p>Alzheimer stated we needed to talk about all components subject to RPP-9937. Miskho handed out the proposed scope of those components to be covered in the revised RPP-9937. Other topics included the TPA change notice for RPP-9937, document schedule, meeting schedule, and future topics.</p> <p style="text-align: center;">0089483</p> <p>A discussion on TPA past practice units occurred regarding the scope of the document.</p> <p>Lyon indicated there are catch tanks outside of the WMA that we monitor and asked whether they would be part of RPP-9937. We need to understand what we mean when we say past practice. (See action below).</p> <p>Burandt asked whether Ecology is just interested in knowing everything is covered such as whether the component is covered in -9937 or a closure plan.</p> <p>Lyon asked if there were catch tanks connected to pipelines before the effective date.</p> <p>Guberski gave an example of 241-C-301 tank, which is a a tank inside of a WMA and may be a past practice tank. Miskho asked whether this discussion would lead to a reclassification of components from TSD to past practice and vice versa.</p> <p>Mathey proposed some criteria for discussion regarding the scope of -9937.  "RCRA leak detection does not apply to (1) inactive components outside of a WMA (i.e., 200-IS-1), (2) past practice inactive ancillary equipment regardless of location. RCRA leak detection requirements apply to (1) tanks (2) ancillary equipment that is TSD applicable (i.e., not past practice), and (3) equipment actively managing waste"</p> <p>Alzheimer asked why C-301 is not in the document just to know the answer. He is not opening up a new set of criteria for what should be in the document. If however, C-301 should have been then in there, then we should reexamine the criteria.</p> <p>Miskho indicated that the classification of components under 200-IS-1 began and was never finished. He indicated that the effective date of mixed waste, August 19, 1987, was not agreed on by Ecology.</p>	



Lyon indicated there are different ways people look at terminology. For example, if the component is discussed in the document, then it is within the scope, and then a determination can be made if monitoring is required. Miskho indicated that was the intent of what "In scope" meant when preparing the handout.

Lyon stated when we have a Functions & Requirements document that has components, then the document should discuss the component. If we now are talking about taking components out and not discussing them, then inspectors can raise an issue that they believe is not covered.

Burandt indicated in the past we tried to define SST System and DST System, and then other components outside of the two systems. The question is whether we missed something because the tank has inventory in it and the tank does not have a "home" in a document.

Voogd asked if -9937 is written to be a piece of the RCRA permit, would we not want it to be constrained to the TSD unit definition?

Lynch asked if we should put a picture together to address Burandt's comment on having a home, to show where each component goes. Part of the solution could be a process description relating to the closure process.

Alzheimer is ok having the -9937 Appendix A pages of detail of past practice be deleted and replaced with text description.

Miskho indicated that there appears to be many lists of components and that the M-45-100 catch tank plan also has a list. His preference as someone looking at systems new to the program, is that there are too many lists and that we should use drawings to manage components.

Burandt said the past problems with using drawings was they could not be kept current.

Lyon indicated that the Part A is a preferred place for him to manage the components.

Guberski indicated that drawings are important because we have an engineered system.

Alzheimer would like an answer on the 241-C-301 catch tank. The 100 and 200 series tanks are the most important parts of -9937. He does not want to be involved in a Part A discussion and does not want the Part A to hold up the effort.

Lyon indicated that Ecology may have to be careful if they have to say that there are tanks out there with liquids that we are not going to monitor. Future governors, program managers, or inspectors would have the ability to question the scope of the document.

Burandt indicated that a paragraph could be written in the document to address the need on scope.

Mathey asked if there was any characterization of the catch tanks. Guberski did not know but speculated there is a 90% chance information is based on process knowledge.

Voogd indicated that we should look at M-023-25 where catch tank characterization was historically documented.

Mathey said there still is a question of what is protective of human health and the environment and what is a practical approach and indicated that Part A list is incomplete.

Lyon indicated that the 241-C-301 tank is an example of not being listed in -9937 so we do not know what has happened to the tank.

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Document schedule:

Johnson: ORP asked WRPS to provide a draft by the end of September, but due to realization of issues, a draft will most likely be delayed till the end of the calendar year.

Alzheimer was hoping to review portions of the document instead of the whole document.

Lyon indicated that sharing portions, even if they are controlled, are preferred.

Alzheimer looked at mission essential components. Guberski indicated that the term may not have meaning any longer.

Lyon stated to tell us what you are monitoring in the document.

Burandt asked if Ecology cares about the frequency of monitoring. Lyons indicated yes and used the 241-C-301 catch tank example of a good one for discussion.

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Mathey asked whether there will be intrusion monitoring or annual reports, and asked for responses to leak and spills.

Johnson indicated that one of the reasons the document needs revision is that the document does not include actions action.

Miskho indicated that there could be program/policy related topics WRPS and ORP need to work out in order to prepare the draft.

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TPA change notice:

Johnson indicated an update to -9937 Table B-1 is provided to update ENRAF VS LOW information and updated the retrieval completion status for C-Farm and S-Farm.

Alzheimer and Lyon indicated they thought the package was OK after review. (See action)

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Next meetings:

Discussion agreed to schedule meetings for every two weeks on Wednesdays 2-4.

June 26<sup>th</sup>: DIL discussion

July 10<sup>th</sup>: In tank and ex tank monitoring

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DIL

Alzheimer White paper – WRPS is working on comments and will discuss at next meeting.

Alzheimer needs to have an understanding of interstitial liquids.

Sheridan that said comments to date have been mostly on factual accuracy.

Alzheimer talked to Schofield about decreasing tanks. The feedback is how to determine declining levels.

Johnson stated DIL is currently part of applying the requirements of -9937 and we need to know how DIL will be used in the revised document.

Miskho indicated that it is important also to know what Ecology will use the "more accurate" information for on DIL. For example, will DIL still be a factor on determining monitoring frequency?

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**Actions:**

2013-06-12-1: ORP: Come with a list of tanks beyond the 100 and 200 series tanks that should be within the scope of -9937 for discussion.

2013-06-12-2: ORP: is there a better way to describe what is excluded from -9937 than using the term "past practice."

2013-06-12-3: Ecology and ORP: Look at history of M-023-25 for the basis of the one-time inspection.

2013-06-12-4: ORP: Provide a draft schedule for -9937 sections.

2013-06-12-5: Ecology: Conform the TPA change notice is OK with the office.

**Decisions made:**

None

**Next Meeting:**

Every two week, Wednesday afternoon 2-4pm (Next June 26<sup>th</sup>)