

**START**

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**Meeting Minutes Transmittal - Comment Draft**

**Unit Managers Meeting  
100-D Ponds  
Trailer 3050 C, Conference Room 1  
Richland, Washington**

**Meeting Held August 8, 1995  
8:00 AM - 10:00 AM**

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

Nicole S. Kimball Date: 9-6-95  
Nicole Kimball, Unit Manager, RL

Not Present Date: \_\_\_\_\_  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Keith R. Holliday Date: 9-6-95  
Keith Holliday, Unit Manager, Washington State Department of Ecology

100-D Ponds, Contractor Concurrence

[Signature] Date: 9/6/95  
Contractor Representative

Purpose: Discuss Status of 100- D Ponds Activities

Meeting Minutes are attached. The minutes are comprised of the following:  
Attachment 1 - Meeting Agenda and Handout  
Attachment 2 - Summary of Discussion and Commitments/Agreements  
Attachment 3 - Attendance List



**Attachment 1****AGENDA - 100-D PONDS  
UNIT MANAGERS MEETING - AUGUST 8, 1995**

## Opening Remarks

- ◆ Changes in Personnel
- ◆ Agenda Review/Expectations
- ◆ Signing of Past Minutes

## Phase II Data Set - Status of:

- ◆ ERC Raw Data, Validation Report, Data Evaluation Report
- ◆ Ecology Split Data
- ◆ Data Evaluation Status and Future Use

## Notice of Violation - Status of:

- ◆ Relationship to Phase II Data Packages
- ◆ Decision on Recommended Action - Options/Schedule

## Notice Of Deficiencies Responses to Responses - Status of:

- ◆ Resolution Strategy - Categories vs. 203 Responses
- ◆ Schedule

ALTERNATIVES FOR ADDRESSING NOV - 100 D PONDS

ALTERNATIVE	DESCRIPTION	EVALUATION OF ALTERNATIVE
No Action	<ul style="list-style-type: none"> <li>• Continued surveillance and maintain single strand wire and signs.</li> </ul>	<ul style="list-style-type: none"> <li>• Existing controls and visible undesirability of the site will prevent inadvertent entry into the pond area.</li> <li>• No acute threat exists in the area. Any intentional exposure for rad would be less than 25 mrem.</li> </ul>
Liner Covering High PCB Area	<ul style="list-style-type: none"> <li>• Cost is \$25,000</li> <li>• Liner area assumed to be 1/4 of settling pond (thus 50ft x 80ft)</li> <li>• Assumes 20 mil PVC with sand bag anchoring</li> <li>• Assumes work can be done as part of maintenance activities not requiring significant procurement or engineering.</li> <li>• Assume residual contamination in balance of pond can be left in place (above MTCA B but below MTCA C).</li> </ul>	<ul style="list-style-type: none"> <li>• Liner addresses high PCB area.</li> <li>• Action does not preclude any future closure options.</li> <li>• Installation easy.</li> <li>• Maintenance and replacement of liner may be required depending on closure schedule.</li> <li>• Liner disposal will be required (probably central landfill).</li> </ul>
Soil (or ash) cover over high PCB Area	<ul style="list-style-type: none"> <li>• Cost ranges from \$21,000 to \$35,000 depending on ash or imported soil to be used.</li> <li>• Volume of material to be used for cover estimated at 150 CY.</li> <li>• Assumes work can be done as part of maintenance activities not requiring significant procurement or engineering.</li> <li>• Adding liner to this option would add approx. \$10,000 to above costs.</li> </ul>	<ul style="list-style-type: none"> <li>• Relatively easy operation since high PCB area is in corner of pond.</li> <li>• Provides more substantial barrier to high PCBs.</li> <li>• Soil placed in pond (approx. 150 CY) may become contaminated and increase disposal costs by approx. \$15,000.</li> <li>• Will not preclude future closure options but may require additional work during final remedy (separate action to deal with ash/soil).</li> </ul>

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ALTERNATIVE	DESCRIPTION	EVALUATION OF ALTERNATIVE
Remove high PCB's	<ul style="list-style-type: none"> <li>• Cost would be dependent on final disposal location. Assuming W025 puts cost at \$230,000. Disposal at ERDF puts cost at \$180,000.</li> <li>• Volume of material to be excavated estimated at 350 CY.</li> <li>• Assumes engineering and procurement activities will be required.</li> <li>• Assumes bulk transportation of soils.</li> <li>• Cost does not include final verification sampling, only field/on-site screening.</li> </ul>	<ul style="list-style-type: none"> <li>• W025 disposal requires current restriction on acceptance of PCB waste to be removed from WAC (liner compatibility test required) and assumes bulk disposal rates apply.</li> <li>• ERDF disposal requires an ERA to be in place and cannot begin prior to ERDF becoming operational, currently projected for July, 1996.</li> <li>• Removes "bad actor" from the site (PCB at State Dangerous Waste levels).</li> <li>• High PCB's probably will require ultimate removal anyway so no lost work except for mobilization costs.</li> </ul>
Fence	<ul style="list-style-type: none"> <li>• Cost is \$30,000.</li> <li>• Assumes work can be done as part of maintenance activities not requiring significant procurement or engineering.</li> <li>• Fencing of entire pond area assumed since a partial fence is not practical (750 ft of fence).</li> </ul>	<ul style="list-style-type: none"> <li>• Easy to implement.</li> <li>• Low maintenance required.</li> </ul>

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**Attachment 2****Unit Managers Meeting  
100-D Ponds  
Trailer 3050 C, Conference Room 1  
Richland, Washington****Meeting Held August 8, 1995  
8:00 AM - 10:00 AM****Summary of Discussion and Commitments/Agreements****1. Opening Remarks**

The changes in personnel were discussed and the 100-D Ponds personnel are: Keith Holliday for Ecology, Nicole Kimball for DOE-RL, and Joan Woolard and Greg Mitchem for ERC. The agenda and expectations as presented in the agenda was acceptable. There are some past unit manager meeting minutes that still need to be signed (could be difficult due to personnel changes). ERC to provide a list of which meeting minutes need to be signed and where the originals are located (with ERC, DOE-RL, or Ecology).

**2. Phase II Data Set**

A brief discussion of the data generated as part of the phase II sampling effort was provided by ERC. The discussion highlighted that the three areas identified in the data results were the rad crust layer, the top couple feet of contaminated soil in the settling pond (contaminated above MTCA B but below MTCA C), and the high PCB area (above state dangerous waste levels but below federal hazardous waste levels) near the settling pond inlet piping. It was requested that the Ecology data be included in the next revision to the Data Evaluation Report and Ecology's preliminary indication was that this would be acceptable. Final concurrence by Ecology to be provided by 8/22/95. The Department of Health is also looking at the rad data and Ecology will investigate the status of this review (action by 8/22/95). Ecology review of the phase II data is pending assignment of an Ecology chemist to the project. Ecology to know by the end of August whether a chemist will be assigned to this project soon and then a schedule can be developed for data review and all follow up work.

**3. Notice of Violation**

The Notice of Violation (NOV) resolution is dependent on the results of Ecology's review of the phase II data set. Ecology stated that no action will be pursued by Ecology until such time that the data has been reviewed and a decision on the NOV can be made. Timing of this decision is dependent on availability of Ecology staff as discussed above. A draft options table showing alternatives available to address the NOV was presented to Ecology. Ecology (Bob Wilson) requested this information as part of a prior conversation. These alternatives can be further discussed once the phase II data has been reviewed.

**4. Notice of Deficiency**

Resolution of the NOD's must also wait until the phase II data has been reviewed. A strategy to address these NOD's in a category format (groundwater issues, fencing issues, etc.) versus individually addressing the 203 comments was presented to Ecology. Final strategy for addressing these issues will be discussed at a later meeting at which time ERC can present proposed closure options.

**5. Set Next Meeting Date**

Action items to be completed by 8/22/95 will be addressed via phone conversation on 8/22. Once Ecology staffing is clarified, a schedule for subsequent meetings will be established (expected date is 8/31/95).



## Distribution:

D. L. Duncan	EPA	HW-106 (Seattle)
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K. Holliday	Ecology	B5-18
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G. B. Mitchem	ERC	H4-89
J. G. Woolard	ERC	H4-89
Field File Custodian		H6-08
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ADMINISTRATIVE RECORD: 100-D Ponds, D-1-1 [Care of EPIC, BHI (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,  
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-074  
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Please send changes to distribution list to G. B. Mitchem (H4-89), (509)372-9632