

START

1000000

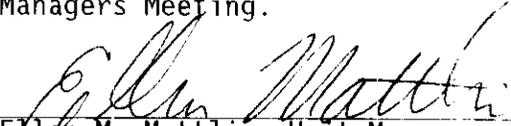
0041157

Meeting Minutes Transmittal - Approval

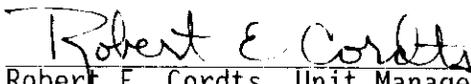
----- Unit Managers Meeting
2727-S Nonradioactive Dangerous Waste Storage Facility
2440 Stevens Center Building, Room 2519
Richland, Washington

Meeting Held January 26, 1995
1:00 PM - 4:00 PM

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


Ellen M. Mattlin, Unit Manager, RL Date: 4/21/95

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


Robert E. Cordts, Unit Manager, Washington State Department of Ecology Date: 2 May 95

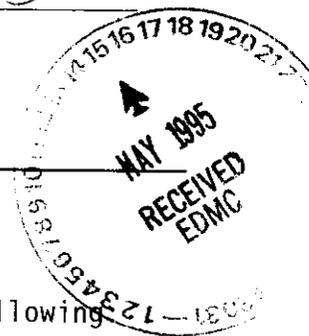
2727-S NRDWS Facility, WHC Concurrence


Fred A. Ruck III, Contractor Representative, WHC Date: 4/11/95

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following

- Attachment 1 - Meeting Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - Comment Response Table for the 2727-S Nonradioactive Dangerous Waste Facility Clean Closure Evaluation Report WHC-SD-EN-TI-242, Rev. 0A.



Attachment 1

**Unit Managers Meeting
2727-S Nonradioactive Dangerous Waste Storage Facility
2440 Stevens Center Building, Room 2519
Richland, Washington**

**Meeting Held January 26, 1995
1:00 PM - 4:00 PM**

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - NONE
3. Status Closure Activities
 - Clean Closure Evaluation Report
 - PE Certification of Closure
 - Site Restoration
 - Removal of Barrels and Demolition Debris
 - Restoration Letter
4. New Business
 - New Ecology Telephone Number
 - Closure Cost Estimates
5. Set Next Meeting Date

Attachment 2

Unit Managers Meeting
2727-S Nonradioactive Dangerous Waste Storage Facility
2440 Stevens Center Building, Room 2519
Richland, Washington

Meeting Held January 26, 1995
1:00 PM - 4:00 PM

Summary of Discussion and Commitments/Agreements

1. **Approval of Past UMM Minutes**

December UMM minutes were signed by the Ecology Unit manager and WHC only. The RL Unit Manager was not present for the December meeting.

2. **Status of Action Items**
- NONE

3. **Status Closure Activities**

- **Clean Closure Evaluation Report**

WHC (Mr. S. M. Luke) indicated that the table of responses to all of Ecology's comments on the *2727-S Nonradioactive Dangerous Waste Facility Clean Closure Evaluation Report* (CCER), WHC-SD-EN-TI-242, Rev. 0, has received RL concurrence and is ready for Ecology to review. The table was given to Ecology at this meeting and will be added as Attachment 5 to these meeting minutes.

WHC (Mr. S. N. Luke) re-stated the December UMM understanding that CCER (Revision 0A) together with the comment response table would provide sufficient information for Ecology to determine if the unit qualifies for clean closure. Obtaining a written determination from Ecology would allow regulatory closure and revision of the report to proceed concurrently. The report will be revised in the most appropriate and cost-effective manner (e.g., page changes, addendum, errata sheets, full revision). Ecology (Mr. R. E. Cordts) reiterated that Ecology would provide RL with a written determination reflecting its position on the closure of this unit.

- **PE Certification of Closure**

WHC is in the process of procuring the services of a professional engineer (PE) to verify completion of any further site restoration (if necessary) and to certify closure.

- Site Restoration

- **Removal of Barrels and Demolition Debris.** WHC (Mr. S. N. Luke) indicated that the barreled waste soils and pelletized piping that had been at the site since unit demolition were disposed of as nondangerous waste at Hanford's Central Waste Landfill on December 30, 1994.

- **Restoration Letter.** WHC (Mr. S. N. Luke) indicated that site restoration is the only remaining field activity to complete closure. Based on prior discussions with Mr. Joseph Witczak of Ecology, WHC is generating a letter that will pursue closure of the unit in its current physical state (i.e., without further site restoration). The letter will justify closing the unit as-is because it poses no threat to the environment, to the public or to site workers. Justification will be based on the unit's clean closure, 200 Area long term future land use considerations, and the location remaining a controlled access area for the foreseeable future. The letter will also compare the costs of the reduced scope closure to the costs of closure in accordance with the closure plan.

4. New Business

None.

5. Set Next Meeting Date

The next Unit Managers Meeting was scheduled as a video teleconference at the Federal Building in Richland from 2:00 PM to 4:00 PM on February 28, 1995.

95-169-244

Attachment 4

Unit Managers Meeting
2727-S Nonradioactive Dangerous Waste Storage Facility
2440 Stevens Center Building, Room 2519
Richland, Washington

Meeting Held January 26, 1995
1:00 PM - 4:00 PM

Action Items

Action Item #

Description

NONE

Attachment 5

Unit Managers Meeting
2727-S Nonradioactive Dangerous Waste Storage Facility
2440 Stevens Center Building, Room 2519
Richland, Washington

Meeting Held January 26, 1995
1:00 PM - 4:00 PM

2727-S Nonradioactive Dangerous Waste Facility Clean Closure Evaluation Report
WHC-SD-EN-TI-242, Rev. 0A, Comment Response Table

2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY
CLEAN CLOSURE EVALUATION REPORT
COMMENT RESPONSE TABLE

January 23, 1995
Page 2 of 5

<u>No.</u>	<u>Comments/Response</u>	<u>Concurrence</u>
2)	<p>Figure 1 identifies 2 X-ray Fluorescence (XRF) locations with the same sample number, B07528. Please explain or correct Figure 1.</p> <p>WHC Response: Figure 1 will be corrected by replacing the XRF sample B07528 at the south end of the unit with sample number B07530. The XRF information, as indicated in Section 4.2.3.4 of the <i>2727-S Nonradioactive Dangerous Waste Storage (NRDWS) Closure Plan</i> (the Plan), DOE/RL 88-37, Rev. 3 A, was initiated for purposes of informational field screening. The XRF samples were taken at locations where analytical samples were taken, XRF information was not used in making closure decisions and XRF results were not otherwise included in the CCER.</p>	
3.	<p>How can rejected selenium and thallium data be used to meet the requirement for such data.</p> <p>WHC Response: Analytical results for selenium and thallium indicate less than 1 ppm for these constituents in all samples (0.60 to 0.65 ppm). These data were rejected by the validation process due to a surrogate spike recovery of zero. The zero recovery most likely occurred because a spike was not added to QC sample B07532MS (page 87 of the lab report). However, when a spike was added to QC sample B07540MS (page 89 of the lab report), the result indicated acceptable recovery rate for the spike.</p> <p>There is no Hanford Site Background (DOE/RL 1993b) value for selenium (Se; CAS #7782-49-2) or for thallium (Tl; CAS #7440-28-0). Neither is recognized as a carcinogen by IRIS (CCER reference EPA 1988a) through assignment of a cancer potency factor (CPF). Both have an oral reference dose (RfD) that, using MTCA B formulas, can be used to calculate residential soil cleanup levels under which the unit may clean close. The residential level for selenium is 400 ppm, indicating that it is not a major concern in the environment. The residential level of thallium is 5.6 ppm for thallium.</p>	

2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY
CLEAN CLOSURE EVALUATION REPORT
COMMENT RESPONSE TABLE

January 23, 1995
Page 3 of 5

<u>No.</u>	<u>Comments/Response</u>	<u>Concurrence</u>
	<p>A review of the waste inventory (Form 4 Generator Annual Dangerous Waste Report, Appendix E of the Plan) indicates that selenium was present in the waste inventory. However, given the short duration of TSD unit operations and given that this unit stored only properly containerized waste under controlled operating conditions, little likelihood exists for elevated selenium concentrations to exist in unit soils due to unit operations.</p> <p>No thallium or thallium compounds are listed in the waste inventory identified in the Form 4 Generator Annual Dangerous Waste Report (Appendix E of the Plan) as having been stored at this unit.</p>	
4.	<p>Nine polycyclic aromatic hydrocarbons (PAHs) were detected in sample B07556. Although these did not individually exceed their respective PQLs or the MTCA Method A cleanup level for PAHs (1 ppm), their total PQLs when added together, could exceed the required cleanup level.</p> <p>WHC Response: All PAH concentrations in surface soil sample B07556 were estimates only (i.e., J qualified by the lab and data validators did not take issue with this qualification). The results were qualified because mass spectral and retention time data identified the presence of the compounds at below contract required quantitation limits (CRQL). As such, these concentrations are usable but potentially suspect. The total of the estimated concentrations for all PAHs in this sample is 4.0 ppm, exceeding the Method A cleanup level of 1 ppm.</p> <p>However, the CCER (Section 2.2.1) provides a technical basis for concluding that because PAHs are photosensitive, they could not have persisted in surface soils from the last date of waste management (1986) until the date of sampling (1992). Consequently, these PAH concentrations could not have originated from unit operations. The CCER provides an alternative hypothesis for the existence of PAH concentrations in this sample as the potential result of the sampling environment.</p>	

2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY
CLEAN CLOSURE EVALUATION REPORT
COMMENT RESPONSE TABLE

January 23, 1995
Page 5 of 5

No.	Comments/Response	Concurrence
7.	<p>SAF 92-262 identified the use of method EPA Method 353.2 for nitrite/nitrate analysis, however, the lab narrative <u>infers</u> the use of EPA Method 300.0. Please confirm the suitability of this substitution.</p> <p>WHC Response: This substitution occurred as identified in the lab narrative. Based on PQL, this substitution is acceptable because 300.0 is more sensitive than 353.2 for nitrate/nitrite analysis. Method 353.2 gives total nitrogen (N) by summing NO₂ and NO₃ and has a PQL of 0.05 ug/L. Method 300.0 speciates NO₂ and NO₃ which have PQLs of 0.002 ug/L and 0.004 ug/L, respectively.</p>	
8.	<p>The data in Appendix A, Table 2, for sample B07560 (pages T2-30 and 39), is identified as estimated (J qualifier) but is not listed in text Table 3 as a detection. This is inconsistent with the format for this report which has been listing all detections in a text table.</p> <p>WHC Response: All semi-volatile organics for sample B07560 were reported as undetected (U) by the lab in summary data sheets. The U was inadvertently left off of Appendix A, Table 2, Table. The validation process qualified these data as estimated (J) which was carried on Appendix A, Table 2.</p> <p>For sample B07560 (pages T2-29 and 39) will be corrected by adding the U. Consistent with the report format for undetects, the sample results will remain unlisted in text Table 3.</p>	

Distribution:

J. K. Bartz	GSSC	R3-82
R. M. Carosino	RL	A4-52
R. E. Cordts	Ecology	- Lacey
D. L. Duncan	EPA	HW-106 (Seattle)
M. J. Furman	RL	R3-80
S. N. Luke	WHC	H6-23
P. J. Mackey	WHC	B3-15
E. M. Mattlin	RL	A5-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
R. R. Thompson	WHC	H6-23
G. T. Thornton	PNL	P7-68
H. T. Tilden	PNL	P7-68
J. L. Waite	WHC	B2-35
GHL/RCRA File	WHC	H6-23
Field File Custodian		H6-08

ADMINISTRATIVE RECORD: 2727-S Nonradioactive Dangerous Waste Storage Facility. S-2-5 [Care of EPIC, WHC (H6-08)]

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

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-074 (Record Center)

Please send comments on distribution list to Scott Luke (H6-23), 372-1667.