

START

Meeting Minutes Transmittal - Approved

Unit Managers Meeting
304 CONCRETION FACILITY
FEDERAL BUILDING, RM 784-A
Richland, Washington

Meeting Held October 13, 1994
From 10:00 am to 11:30 am

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

Ellen M. Mattlin Date: 12/13/94
Ellen M. Mattlin, Unit Manager, RL

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

Scott E. McKinney Date: 12/13/94
Scott E. McKinney, Unit Manager, Washington State Department of Ecology

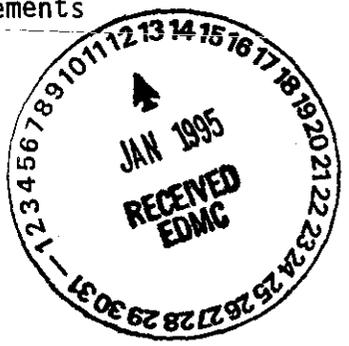
304 Concretion Facility, WHC Concurrence

Fred A. Ruck III Date: 12/13/94
Fred A. Ruck III, Contractor Representative, WHC

Ivan L. Metcalf Date: 12/14/94
Ivan L. Metcalf, Contractor Representative, WHC

Purpose: Discuss Permitting Process

- Meeting Minutes are attached. The minutes are comprised of the following:
- Attachment 1 - Agenda
 - Attachment 2 - Summary of Discussion and Commitments/Agreements
 - Attachment 3 - Attendance List
 - Attachment 4 - Action Items



Attachment 1

Unit Managers Meeting
304 CONCRETION FACILITY
FEDERAL BUILDING, RM 784-A
Richland, Washington

Meeting Held October 13, 1994
From 10:00 am to 11:30 am

Via video teleconference

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 9-23-94:1 Prepare a letter closing out previous NODs and transmitting this last NOD comment. Ecology (S. E. McKinney)
 - 9-23-94:2 Determine the mechanism and schedule adding 304 Concretion Facility into the Hanford Facility RCRA Permit. RL (E. M. Mattlin)
 - 9-23-94:3 Provide answers to Ecology's questions from the 304 Facility tour. WHC (J. G. Adler)
3. Status Closure Activities
 - Status of Ecology's Review of Closure Plan Revision 2
 - Status of Decontamination/Sampling Activities
 - Status of Sampling and Analysis Plan
 - Status of Page Change for Section 7.3
4. New Business
5. Set Next Meeting Date

Attachment 2

Unit Managers Meeting
304 CONCRETION FACILITY
FEDERAL BUILDING, RM 784-A
Richland, Washington

Meeting Held October 13, 1994
From 10:00 am to 11:30 am

Via video teleconference

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The August 25, 1994 and September 23, 1994 meeting minutes were not reviewed since this meeting occurred via video teleconference.

2. Status Action Items

9-23-94:1 Prepare a letter closing out previous NODs and transmitting this last NOD comment. Ecology (S. E. McKinney)

Ecology (S. E. McKinney) stated that the letter was still under preparation. A due date of November 22, 1994 has been established. Additional discussion is included in 'Status of Ecology's Review of Closure Plan Revision 2' below. This action remains open.

9-23-94:2 Determine the mechanism and schedule adding 304 Concretion Facility into the Hanford Facility RCRA Permit. RL (E. M. Mattlin)

RL (E. M. Mattlin) and WHC (J. G. Adler) updated Ecology (S. E. McKinney) on the current status of adding closure plans to the Hanford Facility RCRA Permit. Additional discussion is included in Section 4 (New Business) 'Adding Closure Plans to the Hanford Facility RCRA Permit' below. This action is closed.

9-23-94:3 Provide answers to Ecology's questions from the 304 Facility tour. WHC (J. G. Adler)

WHC (J. G. Adler/J. L. Wright) provided input on the questions Ecology (S. E. McKinney) had during the tour of the 304 Concretion Facility on September 23, 1994. However, additional information is still needed. Additional discussion is included in 'Response to Ecology Site Visit Questions' below. This action remains open.

3. Status Closure Activities

- Status of Ecology's Review of Closure Plan Revision 2

Ecology (S. E. McKinney) stated that the NOD letter associated with action item 9-23-94:1 was still under preparation. Ecology agreed to set a due date of November 22, 1994.

WHC (J. G. Adler) had stated that, based on Ecology's comment at the September UMM and on phone calls after the meeting, a draft revision to Section 8 'Post Closure' is being prepared. It is the intention of RL/WHC to make this change as a page change.

- Status of Decontamination/Sampling Activities

Ecology (S. E. McKinney) and RL (E. M. Mattlin)/WHC (J. G. Adler, J. L. Wright) discussed the status of the decontamination activities at the 304 Concretion Facility. Decontamination of the building (interior ceiling, ceiling girders, interior walls, floor, sump, and trench) has been completed on September 29, 1994.

- Status of the Sump

As expected, it was not possible to damp wipe decontaminate the sump due to deterioration of the concrete. The sample location at the bottom of the sump will determine if any of the dangerous waste constituents of concern are present.

- Response to Ecology Site Visit Questions

During the visit to the 304 Concretion Facility, Ecology (S. E. McKinney) asked several questions. WHC took an action (action item 9-23-94:2) to answer Ecology's questions. The Ecology questions and the responses provided by WHC (J. G. Adler/J. L. Wright) as listed below:

1. Ecology Question: Some of the steam pipes are identified as being asbestos wrapped. How will the radioactive asbestos be disposed of?

WHC Response: Radioactive asbestos is disposed of in an approved burial ground in the 200 Area. The landfill complies with the Toxic Substance Control Act (TSCA) and as such it meets the state requirements.

At this UMM, Ecology asked if RL/WHC had a direct contact. WHC (J. G. Adler) stated that this information was obtained indirectly. Ecology stated that they would continue to look into this for reasons unrelated to the 304 Facility. This question has been answered and is closed.

2. Ecology Question: There are excavations next to the unit that are part of the new electrical system being installed in the 300

Area. Some of the dirt is covered with tarps. How is the dirt from those excavations being handled if it found to be radioactive?

WHC Response: If the dirt is found to be radioactive it is containerized for disposal as radioactive material. Clean dirt is then used as backfill.

This question has been answered and closed.

3. Ecology Question: What are the radiological field screening results from the excavations next to the 304 Concretion Facility? WHC (J. G. Adler/J. L. Wright) also stated that, depending upon availability of the personnel, some field screening for dangerous waste constituents of concern may be performed.

WHC Response: Radiation screening has been done in the excavations near the 304 Facility. The radiation screening and excavation are part of a general 300 Area project to upgrade the electrical utilities. WHC will continue to get results of the radiation screening. WHC was unable, due to scheduling conflicts, to have any field screening done. It is not clear if any other field screening was done as part of the 300 Area Electrical Upgrade. Work will continue to determine if any other screening was done.

This question remains open.

- Status of Rags used for Wipe Decontamination

Ecology (S. E. McKinney) asked how the rags used in the damp wipe decontamination were going to be disposed of. WHC (J. L. Wright) stated that the rags are considered to be radioactive mixed waste but that the exact disposal designation and sampling, if any, is still being determined. Ecology requested to be informed of how the rags will be dispositioned. WHC (J. L. Wright) took an action (10-13-94:1) to report on the disposition of the decontamination rags.

- Status of Sampling and Analysis Plan

RL (E. M. Mattlin)/WHC (J. G. Adler) provided a copy of the Sampling and Analysis Plan (SAP) to Ecology (S. E. McKinney) at the September 23, 1994 UMM. The official transmittal letter is with RL for signatures.

Ecology stated that the official comments on the SAP will probably come with the NOD letter. However, the following comments were provided:

1. Page 1, line 9: The text says that the plan "...provides guidance..." While the SAP is intended to be flexible, it needs to convey to the public that this is the plan to be followed. A stronger term than guidance is needed.

3. Page 19, line 3: Section header "6.1.1 Duplicate Samples" needs to be moved to the location between paragraphs.

4. Page 23, line 45: Has Ecology seen the WHC document *Preparation of Concrete for Volatile Organic Analysis* (LA-523-435)?

5. Page 23, line 15: Why were perchloroethylene and ethyl acetate not included in the SAP?

6. Page 25, lines 15 to 30: This is a list of data validation package elements. Is the raw data going to be provided with the package? Are there two packages, one with and one without the raw data?

Comments No. 1, 2, and 3 are typographical in nature and not discussed in detail.

- Discussion of Comment No. 4

Comment No. 4, "Has Ecology seen the WHC document *Preparation of Concrete for Volatile Organic Analysis* (LA-523-435)," was discussed by RL, WHC, and Ecology. WHC (J. G. Adler) stated that the document has not yet been transmitted to Ecology. It is being prepared in as part of the closure activities for the 300 Area Solvent Evaporator (Ecology Unit Manager is R. E. Cordts). As additional testing was needed to address internal concerns about the limitations of the procedure have delayed official transmittal to Ecology. Currently, a letter is being prepared for transmittal to Ecology that will address the procedure and the limitations associated with using the procedure. Completion is expected for late October or some time in November.

GSSC (J. K. Bartz) asked if Ecology needed to review the procedure prior to approving 304 Facility SAP. Ecology (S. E. McKinney) stated that a review should not be necessary.

The methodology for analyzing for volatile organics in concrete was discussed. The concrete is cored, broken into chunks inside a plastic bag, and the chunks placed in containers. The procedure in question deals with sonification of the concrete chunks in a water bath to extract the volatile organics. The water is then analyzed for the organic constituents of concern using normal test methods.

- Discussion of Comment No. 5

Comment No. 5, "Why were perchloroethylene and ethyl acetate not included in the SAP?" was discussed by RL, WHC, and Ecology.

WHC (J. G. Adler) stated that, at the DQO meeting of May 30/June 1, 1994, perchloroethylene was identified as synonym of tetrachloroethylene. WHC (J. G. Adler) took an action item (10-13-94:2) to provide conformation.

The rationale for not including ethyl acetate was not as clear. WHC (J. G. Adler) stated that there was not an SW-846 procedure for ethyl acetate. Ecology (S. E. McKinney) had a reference at hand that included ethyl acetate was a U-listed waste (U112). WHC (J. G. Adler) took an action item (10-13-94:3, due date Friday, 10/21/94) to try and identify why it was left off and if it should be added to the SAP.

- Discussion of Comment No. 6

Comment No. 6, "This is a list of data validation package elements. Is the raw data going to be provided with the package? Are there two packages, one with and one without the raw data?" was discussed by RL, WHC, and Ecology.

GSSC (J. K. Bartz) stated that there will be one data validation package that includes the elements listed above and the raw data.

- Sampling for Volatile Organics in Concrete

Ecology (S. E. McKinney) stated that the Ecology guidance on sampling for volatile organics in concrete would be reviewed. The intention is to determine if the number of concrete samples for organics is consistent with the guidance. It may be possible to reduce the number of concrete volatile samples. Ecology (S. E. McKinney) took an action (10-13-94:4, due date Friday, 10/21/94) to provide comments on the SAP relative to Ecology's guidance on sampling concrete for volatile organics.

- Status of the 304 Facility SAP

For the record, WHC (J. G. Adler) wanted to confirm the status of the SAP. As of October 13, 1994, Ecology cannot provide a verbal approval to start sampling due to the comments listed above. Of the comments, No. 1, No. 2, and No. 3 are minor and typographical, and No. 4 and No. 6 have been addressed in the UMM. The action item (10-13-94:3) from the discussion of Comment No. 5 is expected to address that comment. Also, additional input from Ecology will be provided on the number of concrete organics samples.

Formal transmittal of the comments is expected. At the minimum, the SAP will also need to be revised to address comment No. 1, No. 2, and No. 3.

- Status of Page Change for Section 7.3

WHC (J. G. Adler) discussed the planned modification to Section 7.3 of the closure plan. This modification was first discussed at the May 4, 1994 UMM. The current text in this section is written with very little flexibility. It is the intention of RL/WHC that this needs to be re-written to allow for more flexibility in what type of building components may be removed and how they are dispositioned (e.g., allow for decontamination and recycle rather than just disposal).

Ecology (S. E. McKinney) stated that such a modification should be acceptable as there was no regulatory requirement requiring disposal. Ecology did recommend that if building components are dangerous waste, then the closure plan needs to be specific on the disposal method for that waste. Sufficient detail needs to be included so that it is clear that there is a plan and rationale for the building components are handled.

WHC stated that the page change for Section 7.3 would be handled along with the page change in Section 8 (that addresses Ecology's verbal NOD comment). It is expected that draft copies may be provided to expedited review and incorporation into the closure plan.

4. New Business

- Adding Closure Plans to the Hanford Facility RCRA Permit

RL (E. M. Mattlin) and WHC (J. G. Adler) updated Ecology (S. E. McKinney) on the current status of adding closure plans to the Hanford Facility RCRA Permit. The 304 Concretion Facility is not expected to be included in the next (early 1995) revision of the Hanford Facility RCRA Permit (the Permit). The exact mechanism for adding the closure plan to the Permit is still being worked out by Ecology-Kennewick and RL and the contractors.

One open issue is whether to include closure plans in the public review for the Permit revisions or to do a separate public review of the closure plans then include them in the Permit revision. RL/WHC are also developing a master schedule for entering all closure plans into the Permit. The 304 Concretion Facility is on that schedule and is one of the early plans for inclusion. Ecology-Kennewick would like to limit the number (about 5 or 6 per year) of closure plans presented to the public during any given year.

RL is preparing a letter to Ecology that discussed the alternative approaches to including the closure plans in the Permit. A series of workshop meetings are scheduled between Ecology-Kennewick, RL, and Hanford contractors to resolve various Permit related issues. RL/WHC will keep the Ecology Unit Manager update as to the results of the workshops.

The above information closes action item 9-23-94:2

5. Set Next Meeting Date

The next Unit Manager's Meeting has been tentatively scheduled for November 22, 1994.

Attachment 4

Unit Managers Meeting
304 CONCRETION FACILITY
FEDERAL BUILDING, RM 784-A
Richland, Washington

Meeting Held October 13, 1994
From 10:00 am to 11:30 am

Via video teleconference

Action Items

| <u>Action Item #</u> | | <u>Description</u> |
|----------------------|---------------------|--|
| 9-23-94:1 | CHANGED 10/13/94 | Prepare a letter closing out previous NODs and transmitting this last NOD comment by 11/22/94. Ecology (S. E. McKinney) |
| 9-23-94:2 | CLOSED 10/13/94 | Determine the mechanism and schedule adding 304 Concretion Facility into the Hanford Facility RCRA Permit. RL (E. M. Mattlin) |
| 9-23-94:3 | OPEN | Provide answers to Ecology's questions from the 304 Facility tour. WHC (J. G. Adler) |
| 10-13-94:1 | NEW 10/13/94 | Report on the disposition of the decon rags. WHC (J. L. Wright) |
| 10-13-94:2 | NEW 10/13/94 | Confirm that perchloroethylene is the same compound as tetrachloroethylene. WHC (J. G. Adler) |
| 10-13-94:3 | NEW 10/13/94 | Try and identify why ethyl acetate was left off and if it should be added to the SAP. Due date Friday, 10/21/94. WHC (J. G. Adler) |
| 10-13-94:4 | NEW 10/13/94 | Provide comments on the SAP relative to Ecology's guidance on sampling concrete for volatile organics. Due date Friday, 10/21/94. Ecology (S. E. McKinney) |

Distribution:

| | | |
|----------------------|---------|------------------|
| J. G. Adler | WHC | H6-23 |
| J. K. Bartz | GSSC | R3-82 |
| R. M. Carosino | RL | A4-52 |
| D. L. Duncan | EPA | Seattle - HW-106 |
| A. B. Joy | RL | R3-81 |
| P. J. Mackey | WHC | B3-15 |
| E. M. Mattlin | RL | A5-15 |
| S. E. McKinney | Ecology | Lacey |
| I. L. Metcalf | WHC | L6-26 |
| D. C. Nylander | Ecology | Kennewick |
| S. M. Price | WHC | H6-23 |
| D. E. Rasmussen | WHC | N1-47 |
| J. A. Remaize | WHC | L6-26 |
| F. A. Ruck III | WHC | H6-23 |
| J. L. Waite | WHC | B2-35 |
| E. A. Weakley | WHC | L6-26 |
| J. L. Wright | WHC | L6-26 |
| RCRA File/GHL | WHC | H6-23 |
| Field File Custodian | WHC | H6-08 |

~~ADMINISTRATIVE RECORD: 881 Construction~~ Facility, TS-3-2, [Care of EPIC, WHC (H6-08)]

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