

START

0024482

October 22, 1990
Final

Meeting Minutes
Unit Managers Meeting: 2101-M Pond
Federal Building, Room G-53
Richland, Washington

Meeting Held September 19, 1990

2101-M Closure Plan, Unit Managers' Approval

Clifford E. Clark Date: 10/23/90
Clifford E. Clark, Unit Manager, DOE-RL, ERD

Megan E. Lerchen Date: 10/23/90
Megan E. Lerchen, Unit Manager, Ecology

NOT PRESENT Date: _____
Daniel L. Duncan, Unit Manager, EPA Region X Unit Manager

_____ Date: _____
Joseph E. Thrasher, WHC, Contractor Representative

PURPOSE: Monthly status report.

Meeting Minutes are attached.

- Attachment #1 - Meeting Summary of Discussion and Commitments
- Attachment #2 - Commitments/Agreements Status List
- Attachment #3 - Attendance List

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Attachment #1
Summary of Discussion

A Unit Managers Meeting of 2101-M Pond was held on September 19, 1990 to discuss Notice of Deficiency (NOD) items.

Discussion took place regarding use of the Model Toxins Control Act (MTCA) as a model to be used to provide a health-based standard for soils which is recognized by the State of Washington. Ecology stated that MTCA standards allow for alternative models and would provide a regulatory base. Using MTCA as a basis, any deviations from MCTA could then be explained.

Westinghouse Hanford Company (WHC) asked if it can have tentative approval for health-based action level NODs to begin work pending review of the final text. Ecology agreed for WHC to go ahead and then see how it compares with Ecology data. Ecology would like for WHC to start with MTCA and then have Ecology review justifications for deviations. MTCA will soon become law and Ecology sees no reason to wait to use MTCA because it is based on sound scientific reasoning.

NOD comment #65 Regarding method of sampling and the difficulty of getting a large-enough sample, Ecology suggested taking two or three samples to comprise a six-inch layer using a baffle so as not to disturb the water. Ecology will address any acceptance problems with the sampling plan at the next Unit Managers Meeting (UMM). WHC would like comments to be addressed in time for sampling to take place in January 1991.

ccc
10/23/90

NOD comment # 3 Ecology finds the response acceptable except for the last line which contains a reference to 2101-M Pond Closure Plan. Ecology wants the sentences in the text rather than just a reference. WHC agreed.

NOD comment # 9 Ecology would like for WHC to go ahead with retesting for PCBs on large-scale; testing samples must not exceed holding times.

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NOD comment #10 WHC stated that all sinks will have been capped and deactivated by the end of this calendar year. Ecology would like this to appear in the Interim Plan. Ecology wants a drawing included in Administrative Procedures showing sinks capped.

ccc
10/23/90

NOD comment #27 Physical safeguards concerns regarding closing the water source is covered by NOD #10.

NOD comment #14 Ecology wanted assurance that samples would be taken in the arms of 2101-M Pond. WHC stated that they are, although there is not always water in the North arm. Ecology suggested simply stating that "No water was present" if appropriate.

NOD comment #22 Ecology stated that values in sample data below State detection limits will not be considered.

NOD comment #27 Clarification was made that the Building Landlord is the same as the Building Manager. The Building Manager

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stated that either he would perform inspections or a person he designates. Ecology wants a statement included that the person doing the inspecting will be independent from personnel using the facility. Ecology would like bi-annual, unannounced inspections with water sampled at outflow. More frequent tests will include pH and total organic carbon. Ecology would also like testing for metals to be performed twice a year.

NOD comment #70

Ecology would like to know what criteria are being used and stated that the method used should be stated for each test or a statement should be made of whether or not the criteria is met. The text of the table to be used is in B-5-D. It was agreed by Ecology and WHC that the table would be changed to agree with the text and an explanation will be included. It was noted that the date of January 1990 was listed in the wrong place.

NOD comment #76

Ecology believes that this item will be covered by sitewide and background revisions.

NOD comment #79

Ecology stated that it is looking only for findings which exceed closure criteria.

NOD comment #114

WHC agreed to include a closure schedule graph in the plan which will look like the ones which are included in 303-K and also to develop a realistic schedule which is to be adhered to. Ecology and WHC agreed to begin with a zero date to take place when sampling starts.

ACTION ITEM: 2101-M UMM minutes from August 14, 1990 will be distributed.

Next meeting to be held Tuesday, October 23, 10:30 a.m. in Richland.

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Attachment #2

ACTION ITEM

COMMITMENTS/AGREEMENTS STATUS LIST

- 6-25-90:2 WHC will submit a copy of the sampling plan to Ecology.
Action Mark Wasemiller.

OPEN The plan has been written but had not been cleared for
release in time for the meeting.
- 6-25-90:3 DOE will send a letter to Ecology which will outline a
proposed method to resolve the issue of the inclusion of new
data in plans. Also included will be a proposed time
schedule for the Closure Plan and Sample Plan. Action Cliff
Clark.

OPEN
- 7-11-90:1 Send Ecology a copy of all of the data set used in the
development of the soil background model strategy. Action
DOE/WHC
- 7-11-90:2 The reference for a study which compared intake values for
and comparing rats LD50 v.s. mice. The reference originates
from Reference Organisms Condition in the Ecosystem Toxicity
section. Action Jim Hoover.
- 9-19-90:1 2101-M UMM minutes from August 14, 1990 will be distributed.

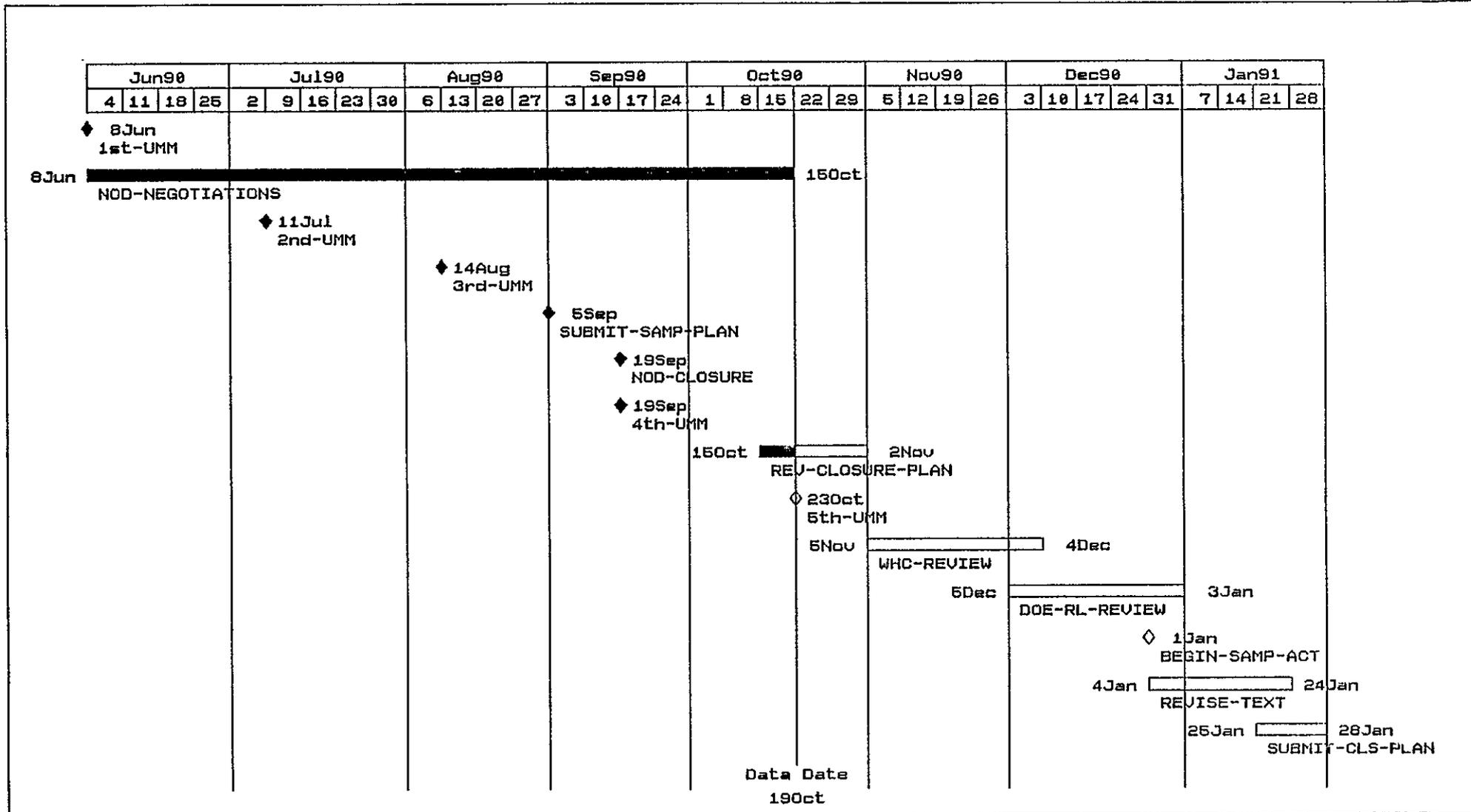
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Attachment #3
Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
J.A. Berger	SWEC	509-376-2636
Bill Cox	WHC	509-376-1978
M.H. Dixon	MHD	509-373-4255
E.R. Hamm	WHC	509-373-2619
J.D. Hoover	WHC	509-376-2668
J.D. King	SWEC	509-376-9709
M.E. Lerchen	Ecology	206-438-3089
F.A. Ruck III	WHC	509-376-9876
J.E. Thrasher	WHC	509-376-9585
M.A. Wasemiller	WHC	509-376-9808

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Legend
 Early CPM

Distribution:

- ~~M.J. Anthony~~ DOE (A6-95)
- J.D. Bauer WHC ~~(B3-15)~~ A5-15 DOE
- ~~S.A. Benfer~~ SWEC (A4-35)
- L.E. Borneman WHC (B2-19)
- E.A. Bracken DOE ~~(A6-95)~~ A5-19
- L.C. Brown WHC (H4-51)
- R.M. Carosino DOE (A4-52)
- C.E. Clark DOE ~~(A6-95)~~ A5-15
- W.G. Cox WHC ~~(S5-65)~~ H4-57
- C.J. Chow WHC (H4-56)
- C. Defigh-Price WHC (B2-20)
- D. Duncan EPA HW-106
- ~~K.R. Fecht~~ WHC (H4-56)
- C.J. Geier WHC (H4-57)
- J. Goodenough DOE (A6-95)
- J.D. Hoover WHC (H4-57)
- R.D. Izatt DOE ~~(A6-95)~~ A5-19
- G.W. Jackson WHC ~~(R2-29)~~ B2-35
- R.J. Landon WHC (B2-19)
- R.E. Lerch WHC (B2-35)
- M. Lerchen Ecology
- H.E. McGuire WHC (B2-35)
- L.L. Powers WHC (B2-35)
- F.A. Ruck III WHC (H4-57)
- K.R. Simpson WHC (H4-57)
- ~~J.E. Thrasher~~ WHC (H4-21)
- ~~H.T. Tilden~~ PNL (P7-68)
- M. Wasemiller WHC (H4-55)
- S.A. Wiegman WHC (B2-19)

- S.B. Clifford WHC (H4-57)
- M.A. Chamness PNL (K6-96)
- T. Leboe WHC

RCRA nonh File, A4-35ST EDMC H4-22
 ADMINISTRATIVE RECORD (2101-M) [Care of Susan Wray, WHC (H4-516)]
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Washington State Dept. of Ecology Nuclear and Mixed
 Waste Library, M.S. PV-11ST

EPA, Region 10, Seattle, HW-074
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