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Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 2101-M Pond Closure Plan
725 Stevens Center Building, Room 219
Richland, Washington

Meeting Held November 24, 1992

2101-M Pond Closure Plan, Unit Managers' Approval

Robert G. McLeod Date: 12-15-92
Robert G. McLeod, RL, Unit Manager, ERD/ERB

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

Elizabeth A. Wiley Date: 12-15-92
Elizabeth A. Wiley, Washington State Department of Ecology, Unit Manager

2101-M Pond Closure Plan WHC Concurrence

Fred A. Ruck III Date: 12/15/92
Fred A. Ruck III, WHC, Contractor Representative

Date: _____
William G. Cox, WHC, Contractor Representative

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

- Attachment #1 - Summary of Discussion
- Attachment #2 - Agenda
- Attachment #3 - Attendance List
- Attachment #4 - Action Items
- Attachment #5 - Handout #1, Statement of Compromise

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Attachment #1

2101-M Pond Closure Plan
Meeting Held November 24, 1992

Summary of Discussion

Review, Amend, Approve, and Distribute Prior Meeting Minutes: The October 29, 1992 Unit Manager Meeting Minutes were distributed and signed.

Review of Action Items:

7-11-91:2 Ecological Risk Assessment: Status will be reviewed at next UMM.

10-29-92:1 Ecology to formally rescind letter of end-of-dispute resolution: Toby Michelena said there was no need to rescind the letter. CLOSED.

While Ecology is still questioning the quality of the 2101-M Pond sampling data package during the Unit Manager Meetings, Toby Michelena (Ecology) refuses to rescind the Ecology letter which states that the 2101-M Pond data package is acceptable and issue resolution has ended (attachment, 2101-M Pond UMM, October 29, 1992). RL/WHC contends that issue resolution has not ended as a result of Ecology's letter. The transmittal letter (attachment, 2101-M Pond, October 5, 1992) for the subject data package clearly states that the information supplied is in addition to what will commonly be forwarded to Ecology, and that by supplying this information RL/WHC is not implying or intending that any precedent be set to provide this data with each and every future set of RCRA sampling analytical results.

10-29-92:2 Phase II Data Validation Package: RL/WHC is in the process of gathering missing data from the lab and revalidating the 2101-M Pond Phase II data due to deficiencies found in the initial validation package.

10-29-92:3 Still open.

Status of NOD Response Table: The NOD responses were sent to Ecology on November 18, 1992.

Issue Resolution Discussion: RL/WHC proposed a compromise concerning the issue resolution topic. The draft compromise statement was presented to Ecology (Attachment #5). RL/WHC requested a timely response by Ecology on what their position is on groundwater sampling analysis data validation (per action item 10-29-92:3) so RL/WHC can firm-up their position for inclusion into the issue resolution process.

Ecology will have to discuss RL's issue resolution proposal internally before commenting on it.

The next UMM is planned for December 15, 1992 at 1:30 - 4:00 p.m.

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Attachment #2

Agenda

2101-M Pond Closure Plan
Unit Managers Meeting

Meeting Held November 24, 1992

- Review, Amend, Approve, and Distribute Prior Meeting Minutes
- Issue Resolution Discussion
- New Business

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Attachment #3

Attendance
Unit Manager Meeting
2101-M Pond Closure Plan

November 24, 1992

Name	(Please Print)	Organization	Role	Phone
<u>Elizabeth Anne Wilkey</u>		<u>Ecology</u>	<u>Unit Mgr.</u>	<u>(206) 493-9426</u>
<u>R. N. Kregel</u>		<u>DOE</u>	<u>RCRA closures</u>	<u>(509) 376-4264</u>
<u>J. A. Lerch</u>		<u>WHL</u>	<u>HASM</u>	<u>(509) 373-3419</u>
<u>BARUCK</u>		<u>WHL</u>	<u>RCRA closure</u>	<u>(509) 376-5876</u>
<u>J. G. Adler</u>		<u>WHL</u>	<u>RCRA closure</u>	<u>(509) 376-0314</u>
<u>L. P. Dillon</u>		<u>WHL</u>		<u>(509) 376-5259</u>
<u>C. B. Simpson</u>		<u>WHE</u>		<u>()</u>
<u>W. G. Cox</u>		<u>WHL</u>	<u>RCRA closures</u>	<u>(509) 376-1978</u>
<u>S. J. Lijels</u>		<u>Drummer & Moore</u>	<u>GSSC</u>	<u>(509) 376-7829</u>
<u>R. L. McLeod</u>		<u>DOE-RL</u>	<u>LLM</u>	<u>(509) 372-0096</u>
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Attachment #4

Action Items

2101-M Pond Closure Plan
Unit Managers Meeting

Meeting Held November 24, 1992

<u>Action Item</u>	<u>Description</u>
7-11-91:2	Forward the completed Ecological Risk Assessment to Ecology by the first week in September 1990. Action: Jim Hoover. OPEN
5-27-92:1	Ecology will provide a formal letter to RL requesting additional data for validation of the Phase II sampling results. Action: E. Wiley CLOSED (6/4/92)
10-5-92:1	The Issue Analysis Worksheet will be rewritten to include the modified issue and positions and will be faxed to Ecology along with draft meeting minutes for review. Action: R.G. McLeod CLOSED
10-29-92:1	Ecology will formally rescind the October 23, 1992 letter from E.A. Wiley to R.G. McLeod (Re: Dispute Resolution Regarding 2101-M Pond Data) in writing. Ecology will document in this transmittal why the data is unacceptable. Action: E.A. Wiley (Ecology) CLOSED Ecology (Toby Michelena) refused to rescind the subject letter. 11-24-92
10-29-92:2	RL/WHC will reevaluate the Phase II data validation package concerning what information has or has not been reviewed and report the findings to Ecology. Action: J.A. Lerch (WHC) OPEN
10-29-92:3	Ecology will determine what their data validation requirements will be for groundwater sample analysis. Action: E.A. Wiley (Ecology) OPEN

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DRAFT

ISSUE DESCRIPTION:

Ecology is requesting additional QA/QC raw data associated with RCRA sampling and analyses in order to make TSD closure decisions. In addition, Ecology is requesting this information be transferred to CLP equivalent forms. However, RL/WHC maintains that the additional QA/QC raw data and types of forms requested by Ecology are not routinely supplied or necessary to perform data validation as established through the data quality objective process. Ecology maintains that standalone data packages are necessary to perform a higher level of data validation to meet data concerns. This same issue will pertain to all other RCRA closure sampling activities and the entire RCRA groundwater monitoring program.

PROPOSED SOLUTION FOR SOIL SAMPLING:

Ecology may choose to take 10-15% split samples and shall validate their data any way they choose. RL/WHC continues to use summary data packages for the RL/WHC samples, and shall validate their data per the Office of Sample Management procedures. Additionally routine laboratory audits shall be performed. When the data show problems (e.g. outliers or splits not consistent), RL/WHC and Ecology will evaluate the problems. If necessary, RL/WHC will request additional raw data to evaluate the problems. For past sampling events (not including US Testing analyses) RL/WHC will make every attempt to provide all requested data that is available.

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Distribution:

R.M. Carosino	DOE	(A4-52)
C.E. Clark	DOE	(A5-15)
W.G. Cox	WHC	(H6-23)
D.L. Duncan	EPA	(HW-106)
G.D. Forehand	WHC	(B2-35)
B.G. Erlandson	WHC	(H6-21)
K.R. Fecht	WHC	(H6-06)
R.D. Freeberg	RL	(A5-19)
G.W. Jackson	WHC	(H6-20)
R.N. Krekel	RL	(A5-15)
R.J. Landon	WHC	(H6-22)
P.J. Mackey	WHC	(B3-15)
R.G. McLeod	DOE	(A5-19)
M.A. Mihalic	WHC	(R2-77)
S.M. Price	WHC	(H6-23)
F.A. Ruck III	WHC	(H6-23)
E.A. Wiley	Ecology	
B. Woods	EPA	(ES-095)

GSSC RCRA UMM File, Care of S. Lijek, A4-35

ADMINISTRATIVE RECORD (2101-M Pond) [Care of EDMC, WHC (H4-22)]

Washington Department of Ecology, Nuclear and Mixed Waste Library, MS PV-11

Environmental Protection Agency, Region 10, Seattle, WA, HW-106

Please send comments on distribution list to Steve Lijek (A4-35), 376-0309.

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