

START

MEETING MINUTES

Subject: ISSUE RESOLUTION DATA REPORTING REQUIREMENTS

TO: Distribution

BUILDING: 740 Stevens Center

FROM: W. G. Cox

CHAIRMAN: C. E. Clark

Dept-Operation-Component	Area	Shift	Meeting Date	Number Attending
Regulatory Support/RCRA Closures	RCHN	DAY	03/16/93	18

DISTRIBUTION:

S. Blacker	A4-35*(Attn. L. Hobbs)	J. Lerch	H4-23*
R. Bowman	H6-24*	R. McLeod	A5-19*
R. Brunke	H6-23	T. Michelena	Ecology-Lacey
F. Calapristi	B2-35*	S. Price	H6-23
J. Carolla	G1-01*	F. Ruck III WGT III	H6-23*
R. Carter	A5-21*	T. Tebb	Ecology-Kennewick
C. Clark	A5-15*	H. Tilden II	P7-68*
S. Clifford	H6-23*	E. Wiley	Ecology-Lacey*
M. Cline	H6-24*	J. Williams Jr	H6-24*
W. Cox	H6-23*	EDMC	H6-08
D. Duncan	EPA-HW-106*	RCRA File/GHL	H6-23
R. Krekel	A5-15*	WGC File/LB	H6-23
S. Lijek	A4-35*		

* Denotes meeting attendees

This meeting was a result of a State of Washington Department of Ecology (Ecology) action item (12-15-92:1) taken during the 2101-M Pond Unit Managers' Meeting on December 15, 1992. The purpose of the meeting was to resolve the issue of data reporting requirements on a Facility-wide basis. Representing the three signatory parties to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) were Mr. Daniel L. Duncan of the U.S. Environmental Protection Agency (EPA), Ms. Elizabeth A. Wiley of Ecology, and Mr. Clifford E. Clark of the U.S. Department of Energy, Richland Field Office (RL).

Ecology's position was the same as it had been for the 2101-M Pond issue resolution meetings. Ecology stated that due to the increased scrutiny and awareness of environmental groups, any site being clean closed on the Hanford Facility needed legally defensible data. Therefore, Ecology requires EPA's contract laboratory program (CLP) equivalent data packages for all clean closure sites. This would allow Ecology to validate and reconstruct the laboratory analyses results. This would also be consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) program at Hanford.

RL's counter proposal was that the data quality objectives (DQO) process should be followed and allow that process to determine the type and quality of the data that is necessary on an individual unit basis rather than stipulating what form the data should take up front. The DQO process is required by the Tri-Party Agreement and provides for up front planning between the involved parties (data users) to work out an optimal plan for accomplishing the desired results.



All three parties agreed that a priority in establishing the type and quality of data was consistency between Resource Conservation and Recovery Act (RCRA) and CERCLA clean up actions. The EPA was particularly interested in getting integration between RCRA and CERCLA, and noted that under the DQO process EPA and Ecology may be able to reduce the number of split samples required. A short presentation on the DQO process, how it should work, and the associated documentation was given by Mr. Stan Blacker of MACTEC and was followed by a question and answer session. One question in particular, brought up by Westinghouse Hanford Company (F. Ruck), addressed the utility of trying to retrofit this DQO process to older closure plans that have already completed sampling. The EPA response was that the DQO process as presented by Mr. Stan Blacker should not be retrofitted into the older closure plans. The DQO process should be followed from this point on for all closure plans that have not completed any sampling.

RESULTS OF THE MEETING:

EPA, Ecology, and RL agreed that they would use the DQO process, as explained in the meeting, for establishing the type and quality of data needed for each closure site.

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