

Meeting Minutes Transmittal - Approved

Project Managers Meeting  
303-K STORAGE FACILITY  
2440 STEVENS CENTER, RM 1200  
Richland, Washington

Meeting Held December 17, 1996  
From 8:30 am to 10:00 am

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

*Ellen M. Mattlin* Date: 2-5-97  
Ellen M. Mattlin, Project Manager, RL

*Clint D. Stuart* Date: 2-5-97  
Clint D. Stuart, Unit Manager, Washington State Department of Ecology

Contractor/Sub-Contractor Representatives

*Fred A. Ruck III* Date: 2/5/97  
Fred A. Ruck III, FDH

*Ivan L. Metcalf* Date: 2/6/97  
Ivan L. Metcalf, BWHC

*Jason G. Adler* Date: 2/5/97  
Jason G. Adler, RFSH

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 5 - Cost of Sampling per 303-K Closure Plan
- Attachment 6 - Cost of Sampling per DQO of 303-K Closure Plan



Attachment 1

Project Managers Meeting  
303-K STORAGE FACILITY  
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Richland, Washington

Meeting Held December 17, 1996  
From 8:30 am to 10:00 am

Agenda

1. Approval of Past PMM Minutes
2. Status Action Items  
None
3. Status Closure Activities
  - Status of DQO Process
  - Status of Budget
4. New Business
5. Set Next Meeting Date

## Attachment 2

Project Managers Meeting  
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From 8:30 am to 10:00 am

### Summary of Discussion and Commitments/Agreements

#### 1. Approval of Past PMM Minutes

The November 1, 1996 Project Managers Meeting (PMM) minutes were signed and approved.

#### 2. Status Action Items

None.

#### 3. Status Closure Activities

##### - Status of DQO Process

The initial data quality objectives (DQO) meeting was held on November 15, 1996. The DQO led to a significant reduction in the number of samples and sample locations. Ecology has become concerned that the scope of the changes exceed what is acceptable for a closure plan that is part of the Hanford Facility RCRA Permit.

##### Ecology's Concern:

The attendees then discussed the rationale behind Ecology's concern: Since the 303-K Storage Facility Closure Plan is part of the Hanford Facility RCRA Permit, the sampling and analysis information in Chapter 7 is legally binding and enforceable. Ecology (S. E. McKinney) stated that minor changes to what is outlined for sampling and analysis can be acceptable. The mechanism for doing this is to submit the minor modifications to Ecology for review and approval in a Sampling and Analysis Plan (SAP). This also provides documentation of the changes. Examples of changes that could be made in this manner could include elimination of the volatile samples (based on what has been demonstrated during other closures), modification to the size of the soil sampling interval (to reflect /volume requirements for analysis), and the numbers and types of quality control/quality assurance samples. However, the number of sample locations and number of samples would not change significantly.

Ecology (S. E. McKinney) stated that the changes resulting from the 303-K DQO are significant (4 sample locations instead of 44) and

could not be implemented via an approved SAP, due to inconsistencies with the closure plan as it exists as part of the permit. Changes of that magnitude would require a modification of the permit. Ecology stated they did not think that RL/FDH/RFSH would want to do a permit modification due to the budget and schedule impacts. RFSH (J. G. Adler) stated that there are some site-wide budget impacts (see Status of Budget) that work in favor of doing a permit modification and public review.

#### Changing the Closure Plan

The attendees discussed the content of the closure plan. The sampling and analysis information in the closure plan had not changed significantly since the early 1990s. It was agreed that a great deal had been learned during the previous closures, and the high level of sampling could be reduced and still protect human health and the environment.

The attendees discussed how changes could be made to the closure plan. The consensus reached was that to implement the changes as proposed in the DQO would require public review as part of the modification process for the permit. RL (E. M. Mattlin) and FDH (F. A. Ruck III) stated that they are interested in pursuing a change to the closure plan, even if it involves a public review as part of a permit modification. The proposed mechanism for the change would be via a permit condition. The permit condition would reference a SAP. The permit condition would state that the SAP would supersede the sampling and analysis information in Chapter 7 of closure plan. Ecology (S. E. McKinney, J. J. Wallace, C. D. Stuart) indicated that this was an acceptable course of action. The attendees were not sure if a class 2 or class 3 modification would be required. The attendees (C. D. Stuart, Ecology, and J. G. Adler, RFSH) would examine the permitting process to determine what exactly was required to incorporate these changes (Action Item 12-17-96:1)

The basis for making the changes was discussed. Based on what has been learned at other closures, RL/FDH/RFSH believes that the DQO agreements on reduced sampling are valid. Ecology stated that the SAP would need to document the basis of any changes.

The attendees then discussed drivers for changing the sampling at 303-K. The biggest single driver for making the changes is cost. The budgeted cost of the 303-K sampling per the closure plan (Attachment 5) is \$154,000. The anticipated cost per the November 17 DQO meeting (Attachment 6) would be \$16,000. This could provide a savings of about 90 percent. Ecology (S. E. McKinney) requested information on the actual cost of sampling during the closure of the 304 Concretion Facility. BWHC (I. L. Metcalf) stated that the information would be located and passed on to Ecology (Action Item: 12-17-96:2).

Ecology (J. W. Yoke) asked how the results of the DQO process would be documented for the public. FDH (F. A. Ruck III) and RFSH (J. G. Adler) responded: For this case, there is a need to document the decisions in greater detail than has been done before. To meet this

need, an extra section or appendix would be added to the SAP that would document the technical reasons for reducing sampling. In addition, the DQO minutes would become part of the administrative record. This topic can also be part of the Project Manager's meeting minutes, which are a part of the administrative record. Besides being added to the Permit, the SAP itself is incorporated into the administrative record. This provides the paper trail for documenting the results of the DQO process.

#### Schedule Impacts

The attendees then discussed the schedule for the changes and schedule impact on the current implementation effort. The intention in implementing a permit modification would be to complete the DQO meeting and issue a SAP by this Spring 1997. The SAP would then be incorporated via class 2 or class 3 change during Modification C of the permit. This would be completed this fiscal year (FY97). The closure activities specified in the SAP would then start in Oct 1997 at the beginning of FY98. It is expected that the closure activities could be completed and a certification submitted to Ecology by the original July 31, 1998 due date. However, to allow for potential delays, a 45-day extension of the July 31, 1998 completion date may be requested as part of the permit modification process.

#### Budget Impacts

Ecology asked if going for public review would increase the cost. FDH (F. A. Ruck III) responded that the answer is no. Based on the experience from previous closures and permit modifications, very little extra cost would be incurred. The SAP has to be produced if major changes are made anyway. RL and FDH are already budgeted to support the permit modification process. The RFSH work load to support public review is minor. Ecology asked about the budget impact of the 303-K closure being inactive. BWHC (I. L. Metcalf) and RFSH (J. G. Adler) stated that the cost is minimal since the charges are activity based: If the project is not active, then people are not charging against it. For additional discussion of the overall budget situation, see "Status of Budget"

#### - Status of Budget

BWHC (I. L. Metcalf) updated Ecology on the status of the overall budget relative to the 303-K Storage Facility. When the 1997 budget for RCRA activities within stabilization project was set up, certain assumptions were made. One assumption was the amount of carry-over dollars from other programs. Another was the amount of the baseline budget provided from DOE Headquarters. There has been a \$16 million shortfall in the stabilization project caused by less carry-over than originally anticipated, the needs and demands of other programs, and by the baseline budget being reduced.

The approach to budgeting is risk-based: the highest risk programs get priority for funding. Closure of the 303-K Storage Facility is a low risk when compared to other programs and projects on site. While there is still a chance that complete funding for 303-K will

be available, it probably will not happen. In that case, the 303-K Storage Facility closure would complete the DQO and issue the SAP during FY97. The field activities (decontamination (if any), sampling), sample analysis, the final report, and the certification would be completed during FY98.

Also, going out for public review of a SAP to reduce sampling fits in with the need to stretch out the schedule. The cost savings from reducing the sampling and analysis provides an additional incentive to pursue this option. Ecology (J. J. Wallace) asked if any cost saving from 303-K would be applied to the closure of the 300 Area Waste Acid Treatment System (300 WATS), which has a higher risk level than 303-K. BWHC (I. L. Metcalf) responded: That cannot be assumed to take place. While it would be logical, the money saved could be directed to a project or program that has a higher risk. Ecology asked which organization within DOE-RL funds these closures (303-K, 300 WATS). RL (M. R. Hahn) responded that the Transition Program Division under Jim Mecca is responsible for these closures. Ecology also requested title and numbers that would identify these closures in the Multi-Year Work Plan (MYWP). BWHC (I. L. Metcalf) took an action (Action Item 12-17-97:3) to provide that information to Ecology.

4. **New Business**

- None

5. **Set Next Meeting Date**

The next DQO meeting has been scheduled for January 15, 1996 at Ecology's office in Kennewick, WA. Because of the DQO meeting, a Project Managers' Meeting will not be held during January.

Attachment 3

Project Managers Meeting  
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 From 8:30 am to 10:00 am

If a stenographer is present to take detailed notes of the proceeding of this meeting, these notes will be used for the sole purpose of preparing the meeting minutes. After the meeting minutes are finalized, the stenographer's notes will be destroyed.

If any attendees have objections with this approach, they should voice these objections at this time.

Attendance List

Name	Organization	Phone #
J. G. Collins	RFSH Environ. Serv.	376-2513
John A. Rasmussen	BWHC	372-1462
Scott McKinney	Ecology	360 786-1994
Kathy Knox	Knox Court Reporting	946-6816
Stephanie Johnson	Dames & Moore	376-5960
ELLEN MATTLIN	DOE-RL	376-2385
Mark Hahn	DOE-RL	373-9872
DAVE E. RASMUSSEN	BWHC, 300 AREA STABILITY <sup>PROJ.</sup>	376-3288
NINA M. Monard	RFSH ES	372-3627
J. L. W. YORKE	Ecology	736-3019
Jeanné Wallace	Ecology	736-3019
Clint Stuart	Ecology	736-3010
JUAN METCALF	BWHC / FSS	376-7675

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Action Items

<u>Action Item #</u>		<u>Description</u>
12-17-96:1	New	The permitting process will be reviewed to determine what exactly was required to incorporate a Sampling and Analysis Plan for 303-K into the Hanford Site RCRA Permit Ecology (C. D. Stuart) RFSH (J. G. Adler)
12-17-96:2	New	Provide Ecology (S. E. McKinney) information on the actual cost of sampling during the closure of the 304 Concretion Facility. BWHC (I. L. Metcalf)
12-17-96:3	New	Provide Ecology (J. J. Wallace) with the titles and numbers that identify the closure of the 303-K Storage Facility and the 300 WATS in the Multi-Year Work Plan (MYWP). BWHC (I. L. Metcalf)

Attachment 5

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TITLE - Cost of Sampling per 303-K Closure Plan

Cost of Sampling per 303-K Closure Plan

Type of Sample/Location	Number of Locations	Number of Sample Sets	Est. Cost per set (\$2000/set)
Concrete Authoritative	2	2	\$ 6,000
Concrete Random	19	19	\$ 38,000
Asphalt Random	13	13	\$ 26,000
Soil Random	5	15	\$ 30,000
Soil Authoritative	5	15	\$ 30,000
Concrete QA Samples (per day of concrete sampling)			
Equipment Blank		1	\$ 2,000
Field Blank		1	\$ 2,000
Trip Blank		1	\$ 2,000
Duplicate Blank		1	\$ 2,000
Soil QA Samples (per day of soil sampling)			
Equipment Blank		1	\$ 2,000
Field Blank		1	\$ 2,000
Trip Blank		1	\$ 2,000
Duplicate Blank		1	\$ 2,000
Asphalt QA Samples (per day of asphalt sampling)			
Equipment Blank		1	\$ 2,000
Field Blank		1	\$ 2,000
Trip Blank		1	\$ 2,000
Duplicate Blank		1	\$ 2,000
<b>TOTALS</b>	<b>44</b>	<b>76</b>	<b>\$154,000</b>

Attachment 6

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TITLE - Cost of Sampling per DQO of 303-K Closure Plan

Cost of Sampling per DQO of 303-K Closure Plan

Type of Sample/Location	Number of Locations	Number of Sample Sets	Est. Cost per set (\$2000/set)
Concrete	1	1	\$ 2,000
Soil	3	3	\$ 6,000
Concrete QA Samples			
Equipment Blank		1	\$ 2,000
Duplicate Sample		1	\$ 2,000
Soil QA Samples			
Equipment Blank		1	\$ 2,000
Duplicate Sample		1	\$ 2,000
<b>TOTALS</b>	<b>4</b>	<b>8</b>	<b>\$ 16,000</b>

Distribution:

Washington State Department of Ecology

S. E. McKinney	Lacey
C. D. Stuart	B5-18
J. J. Wallace	B5-18

U. S. Department of Energy

R. M. Carosino	A4-52
M. R. Hahn	R3-79
A. B. Joy	R3-79
E. M. Mattlin	A5-15

Flour Daniel Hanford, Inc.

L. J. Olguin	H5-20
S. M. Price	H6-23
F. A. Ruck III	H6-22
B. D. Williamson	B3-15
RCRA File	H6-23
Field File Custodian	H6-08

B&W Hanford Company

I. L. Metcalf	L6-26
J. A. Remaize	L6-26

Rust Federal Services of Hanford, Inc.

J. G. Adler	H6-24
R. C. Bowman	H6-24
R. H. Engelmann	H6-26
N. M. Menard	H6-24
J. A. Winterhalter	H6-25

ADMINISTRATIVE RECORD: 303-K Storage Facility, S-3-1, [Care of EDMC, FDH (H6-08)]

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

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

Please send comments on distribution list to Jason Adler (H6-23),  
(509) 376-7513.