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Meeting Minutes Transmittal - Approved

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1600
Richland, Washington

Meeting Held September 8, 1993
From 8:30 am to 10:30 am

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

Randall N. Krekel Date: 10/12/93
Randall N. Krekel, Unit Manager, RL

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

Alisa D. Huckaby Date: 10/12/93
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

4843 Alkali Metals Storage Facility, WHC Concurrence

Fred A. Ruck III Date: 10/12/93
Fred A. Ruck III, Contractor Representative, WHC

Not present. Date: _____
J. A. (Mickey) Seamans, 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 5 - Handout: COMMENTS FOR CONSOLIDATION

0031620-4-3200

Attachment I

**Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1600
Richland, Washington**

**Meeting Held September 8, 1993
From 8:30 am to 10:30 am**

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 7/14/93:1
 - 7/14/93:2
 - 8-11-93:1
 - 8-11-93:2
3. Status Closure Activities
 - Status of NOD comments
 - NOD Comment Consolidation
 - Clarification of NOD Comment No. 50
4. New Business
5. Set Next Meeting Date

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Attachment 2

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1600
Richland, Washington

Meeting Held September 8, 1993
From 8:30 am to 10:30 am

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The August 11, 1993 meeting minutes were reviewed and approved.

2. Status Action Items

- 7-14-93:1 Pending; awaiting removal of waste from 4843 AMSF and scheduling of the survey.
- 7-14-93:2 Pending; awaiting removal of waste from 4843 AMSF and scheduling of the survey. Current delays are being caused by difficulties in determining the long-term storage requirements for alkali metal waste at the Central Waste Complex.
- 8-11-93:1 Completed; the required table is included in attachment 5. See "NOD Comment Consolidation" for details.
- 8-11-93:2 Completed; Ecology accepts the RL/WHC proposal to consolidate comments. See "NOD Comment Consolidation" for details.

3. Status Closure Activities

- Status of NOD comments

WHC (J. G. Adler) stated that work on replying to the Ecology NODs is continuing. Also, RL/WHC has received the letter from Ecology agreeing to the November 4, 1993 due date for the NOD Response Table.

- NOD Comment Consolidation

Ecology (A. D. Huckaby) stated that they accept the proposal to consolidate comments in the NOD Response Table (Action Item 8-11-93:2) with two conditions. The first condition is to include Comment No. 43 in the consolidation with Comment No. 3. The second condition is that Comment No. 77 be excluded from consolidation with Comment No. 27 and that Comment No. 77 be addresses separately. WHC (J. G. Adler) stated that complying with these conditions was acceptable. A handout (attachment 5) was provided that summarizes and lists, in detail, the

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comments for consolidation. The handout includes the conditions required by Ecology.

- Clarification of NOD Comment No. 50

WHC (J. G. Adler) asked for clarification on NOD Response Table Comment No. 50. Specifically, what is the "process" the comment referring to and does Ecology want the information provided directly. Ecology (A. D. Huckaby) stated that the "process" is any and all processes that generated the waste. However, the main thrust of the question is that Section 4.2 does not include sufficient information and justification to properly identify the waste characteristics. Ecology stated that this justification needs to be added to Section 4.2 and that additional data does not need to be provided to Ecology. WHC stated that Comment No. 50 will be addressed on the basis of modifying Section 4.2 to provide proper and sufficient justification for the proposed waste codes and analysis.

4. **New Business**

No new business.

5. **Set Next Meeting Date**

The next meeting has been set for October 12, 1993, for 1:00 pm at Richland, Washington.

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Attachment 4

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1600
Richland, Washington

Meeting Held September 8, 1993
From 8:30 am to 10:30 am

Action Items

<u>Action Item #</u>		<u>Description</u>
07-14-93:1	OPEN	Arrange for Ecology to attend radiation survey of 4843 AMSF. (WHC: J. G. Adler)
07-14-93:2	OPEN	Provide Ecology with copy of the radiation survey procedure. (WHC: J. G. Adler)
8-11-93:1	CLOSED 9/8/93	Review request to consolidate comments and provide response at or before the September 1993 UMM. (Ecology: A. D. Huckaby)
8-11-93:2	CLOSED 9/8/93	Provide a single sheet that could be added to the NOD Response Table that identifies all comments proposed for consolidation by the September 1993 UMM. (WHC J. G. Adler)

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Attachment 5

Unit Managers Meeting
4843 ALKALI METAL STORAGE FACILITY
740 STVCN, RM 1600
Richland, Washington

Meeting Held September 8, 1993
From 8:30 am to 10:30 am

TITLE - COMMENTS FOR CONSOLIDATION

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4843 AMSF NOD RESPONSE TABLE
SUMMARY OF CONSOLIDATED COMMENTS

September 8, 1993

<u>OPEN COMMENT</u>	<u>COMMENTS CLOSED AND CONSOLIDATED WITH THE OPEN COMMENT</u>
No. 2	No. 54, No. 56, No. 57, and No. 58
No. 3	No. 6, No. 21, No. 37, No. 38, No. 41, and No. 43
No. 4	No. 11 and No. 45
No. 5	No. 55
No. 7	No. 8
No. 10	No. 29
No. 15	No. 23, No. 24, and No. 25
No. 27	No. 78 and No. 79
No. 31	No. 42
No. 52	No. 13, No. 14, No. 17, No. 20, No. 30, No. 46, No. 66, No. 68, and No. 74
No. 59	No. 76

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4843 AMSF NOD RESPONSE TABLE
COMMENTS PROPOSED FOR CONSOLIDATION

September 8, 1993

Comment No. 2 (General) (Subject: radiation issue)

It is proposed that the following comments be closed and consolidated into Comment No. 2: No. 54, No. 56, No. 57, and No. 58.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 2."

The following will be incorporated into Comment No. 2:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comments have been closed and consolidated with Comment No. 2: No. 54 (General), No. 56 (4.0), No. 57 (7.3.3), and No. 58 (7.3.2)."

Comment No. 3 (General) (Subject: soil sampling)

It is proposed that the following comments be closed and consolidated into Comment No. 3: No. 6, No. 21, No. 37, No. 38, No. 41, and No 43.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 3."

The following will be incorporated into Comment No. 3:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comments have been closed and consolidated with Comment No. 3: No. 6 (2-2/38), No. 21 (6-1/40-45), No. 37 (7-7/33-34), No. 38 (7-7/33), No. 41 (F7-1), and No. 43 (F7-3)."

Comment No. 4 (General) (Subject: oil analysis)

It is proposed that the following comments be closed and consolidated into Comment No. 4: No. 11 and No. 45.

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The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 4."

The following will be incorporated into Comment No. 4:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comments have been closed and consolidated with Comment No. 4: No. 11 (4-1/10) and No. 45 (Appendix C)."

Comment No. 5 (2-2/15-16) (Subject: aerial photos)

It is proposed that the following comment be closed and consolidated into Comment No. 5: No. 55.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 5."

The following will be incorporated into Comment No. 5:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comment has been closed and consolidated with Comment No. 5: No. 55 (General)."

Comment No. 7 (3-1) (Subject: past operations documents)

It is proposed that the following comment be closed and consolidated into Comment No. 7: No. 8.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 7."

The following will be incorporated into Comment No. 7:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comment has been closed and consolidated with Comment No. 7: No. 8 (3-1/7)."

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Comment No. 10 (3-2/36-40) (Subject: Storage of non-wastes)

It is proposed that the following comment be closed and consolidated into Comment No. 10: No. 29.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 10."

The following will be incorporated into Comment No. 10:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comment has been closed and consolidated with Comment No. 10: No. 29 (7-3/46)."

Comment No. 15 (6-1/18) (Subject: action levels)

It is proposed that the following comments be closed and consolidated into Comment No. 15: No. 23, No. 24, and No. 25.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 15."

The following will be incorporated into Comment No. 15:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comments have been closed and consolidated with Comment No. 15: No. 23 (6-1/13), No. 24 (6-2/11), and No. 25 (6-2/33-35)."

Comment No. 27 (7-3) (Subject: relief joints)

It is proposed that the following comments be closed and consolidated into Comment No. 27: No. 78 and No. 79.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 27."

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The following will be incorporated into Comment No. 3:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comments have been closed and consolidated with Comment No. 27: No. 78 (2-2/33-35 and 7-3/44-46) and No. 79 (7.3.3)."

Comment No. 31 (7-4/9)

(Subject: justification of number of floor samples)

It is proposed that the following comments be closed and consolidated into Comment No. 31: No. 42.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 31."

The following will be incorporated into Comment No. 31:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comment has been closed and consolidated with Comment No. 31: No. 42 (F7-2)."

Comment No. 52 (General)

(Subject: appropriate analysis)

It is proposed that the following comments be closed and consolidated into Comment No. 52: No. 13, No. 14, No. 17, No. 20, No. 30, No. 46, No. 66, No. 68, and No. 74.

The closed comments will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 52."

The following will be incorporated into Comment No. 52:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comments have been closed and consolidated with Comment No. 52: No. 13 (4-2/1), No. 14 (4-2/23), No. 17 (6-1/22), No. 20 (6-1/37), No. 30 (7-4/1), No. 46 (Appendix D), No. 66 (Appendix G/ Table G-1), No. 68 (Appendix G-5/ Table G-1), and No. 74 (7-3/12-13)."

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Comment No. 59 (7-6/36-40)

(Subject: copy of EII manual)

It is proposed that the following comment be closed and consolidated into Comment No. 59: No. 76.

The closed comment will incorporate the following statement in the NOD Response Table:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, this comment has been closed and consolidated with Comment No. 59."

The following will be incorporated into Comment No. 59:

"COMMENT CONSOLIDATION: As agree at the Unit Managers Meeting of September 8, 1993, the following comment has been closed and consolidated with Comment No. 59: No. 76 (7-2/17-0)."

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Distribution:

J. G. Adler	WHC	H6-23
J. K. Bartz	GSSC	A4-35
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	Seattle (HW-106)
O. A. Farabee	RL	N1-39
R. G. Hastings	RL	N1-39
A. D. Huckaby	Ecology - Kennewick	
R. N. Krekel	RL	A5-15
P. J. Mackey	WHC	B3-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
J. A. Seamans	WHC	N2-04
J. L. Waite	WHC	B2-35
RCRA file/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: 4843 ALKALI METAL STORAGE FACILITY (S-4-1) [Care of EPIC, WHC (H6-08)]

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