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Environmental Restoration Contractor **ERC Team**

Meeting Minutes

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TSD: N/A
ERA: N/A
Subject Code: 4170; 4170

SUBJECT Canyon Disposition Initiative Team Meeting

TO Distribution

FROM R.P. Henckel

DATE July 11, 1996

ATTENDEES

Jim Goodenough	DOE-RL
Paul Beaver	EPA
Bob Julian	Ecol
Bob Henckel	BHI
Ron Borisch	WHC
George Cox	WHC
Jim Rugg	BHI
Phil Snider	BHI

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Distribution list

AUG 1996 RECEIVED EDMC

A meeting on the above subject was held on July 11, 1996, at the EPA Conference Room.

General Discussion: The meeting focused on background information on U Plants, review of regulatory issues, review of issues from a prior meeting, and development of the proposal by the Team to management..

A status of Action Items from all the previous meetings was reviewed by the Team. The list will updated and reviewed at the next meeting.

A briefing on the HAB ER Committee July 10, 1996 presentation was conducted by Jim Goodenough. In general the ER Committee was intrigued with the option of entombment with waste disposal for the canyons and felt that the evaluation of all the alternatives should be pursued. The ER Committee proposed preparing a statement for the entire HAB to support continuing with the canyon initiative.

A meeting was held between RL, EM-60 and EM-40 AMEs and staff on the canyon initiative. An action from this meeting, was to prepare an Agreement in Principle (AIP) for signature by RL and the Regulators. A draft of the AIP will be prepared by the Team and will include recommendations for regulatory pathway, on the viability of all alternatives (leave in place and removal), and for conducting initial activities at a selected canyon.

A handout of background information including a list of equipment stored in U Plant was provided by Phil Snider. This information was provided to assist with regulatory pathway issues, especially for waste disposal considerations. **Action Item: Bob Julian requested a copy of the U Plant S&M Plan which was used as a reference to develop the background information handout.(Henckel)**

The Team continued discussions on the regulatory pathway selection. The options were reviewed from the a handout provided at a previous meeting. ***The Team has reached consensus that the CERCLA pathway should be utilized to obtain a ROD for the canyons.*** Concerns were expressed for utilizing Part B RCRA permits for the waste disposal alternative. A review of Pros/Cons for the RCRA and CERCLA approach was conducted to address this question. The following was developed assuming that the CERCLA process was used for alternative selection and that no off-site wastes would be considered:

WASTE DISPOSAL

APPROACH	Pros	Cons
RCRA	- Except all RCRA Wastes	- Administrative Burden
	- Acceptable to stakeholders	- No current model to go on (Unique)
		- Time, cost to obtain permit
		- No waivers
CERCLA		
	- Shorter schedule to end point	- May not be able to accept all RCRA wastes
	- Less expensive to obtain	
	- Availability of waivers	
	- Considerably reduced Administrative requirements	
	- ERDF precedent	

The consensus of the TEAM was to utilize the CERCLA process to reach a ROD. If the waste disposal option is a preferred option ,then the option to use either the RCRA or CERCLA process for waste disposal will be determined at that time.

The following issues from the June 13, 1996 meeting were revisited

- Backfill material sources for the barrier
- Type of barrier required for canyons
- Amount of characterization required for the canyons
- Protection of groundwater
- RCRA minimum technical requirements (MTR)
- TRU waste definition/ package size
- Final action with remaining institutional controls
- Canyon construction
- Waste matrix
- Leachate collection system requirement

The team reviewed each of the issues to determine if they presented a road block to pursuing the canyon disposition initiative. This evaluation focused on the entombment with waste disposal option for its' time

dependent nature. ***The Team concluded that although some issues may be extremely challenging, there does not appear to be any road blocks to pursuing this initiative.***

Action Items: Produce a regulatory options paper related to waste disposal issues. (Rugg)
Produce an outline for the Agreement in Principle for the next meeting. (Henckel)

The next meeting was scheduled for Thursday July 18, 1996 from 1:00pm - 4:00pm at the EPA Conference Room. The meeting agenda will include discussion of action items, review of the AIP outline, and initial brainstorming on the path forward.

Distribution

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Jim Goodenough	RL	H0-12
Paul Beaver	EPA	B1-05
Bob Julian	Ecology	B5-18
Moses Jaraysi	Ecology	B5-18
Bob Henckel	BHI	X5-53
Ron Borisch	WHC	R3-56
George Cox	WHC	R3-56
Jim Rugg	BHI	X5-53
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