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Final

Meeting Minutes Transmittal/Approval

Unit Managers Meeting
303-K Mixed Waste Storage Facility
Federal Building, Room 590-A
Richland, Washington
Meeting Held May 6, 1992

303-K Mixed Waste Storage Facility Unit Managers' Approval

Randall N. Krekel Date: 11-5-92
Randall N. Krekel, RL, EAP/RPB, Regulatory Permits Branch, Unit Manager

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

Scott E. McKinney Date: 11-5-92
Scott E. McKinney, Washington State Department of Ecology, Unit Manager

Fred Ruck III Date: 11/5/92
Fred Ruck III, WHC, Contractor Representative

David J. Watson Date: 11/5/92
David J. Watson, WHC, Contractor Representative

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

- Attachment #1 - Summary of Discussion
- Attachment #2 - Agenda for the Meeting
- Attachment #3 - Attendance List
- Attachment #4 - Commitments/Agreements Status List
- Attachment #5 - Department of Ecology NOD for 303-K Radioactive Mixed Waste Storage Facility NOD Response Table, 11-18-92

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Attachment 1

Summary of Discussion

Unit Managers Meeting
303-K Mixed Waste Storage Facility
Federal Building, Room 590-A
Richland, WA
May 6, 1992

The meeting opened at 10:20 a.m.

The first item of business was the status of Ecology's review of Revision 1 of the closure plan. WHC (F. Ruck) indicated RL/WHC had received Ecology's NODs and is in the process of reviewing them. Ecology (S. McKinney) provided a revised copy of Ecology's NODs (see Attachment #5) because comments #12 and #36 had inadvertently been omitted from the latest NOD issued by Ecology. It was agreed that the revised NODs would be submitted to RL via the unit managers meeting.

RL/WHC informed Ecology that an extension would be requested for response to the NOD comments similar to the request submitted for the 304 Concretion closure plan.

Concrete sampling was discussed. Scott McKinney (Ecology) expressed the preliminary opinion that TCLP would probably be sufficient for designating concrete, except in cases where concrete contains dangerous waste constituents not included in TCLP. Mr. McKinney also stated that if concrete analysis is performed beyond TCLP, Ecology would probably move for doing TCLP plus target analytes. Ecology stated that it would be helpful if WHC would somehow determine when the ceiling of 304 Concretion was poured and from what borrow pit the aggregate would have been taken at that time.

There were no new items of business.

The next Unit Managers Meeting was scheduled for June 3, 1992, at 9:30 a.m., in Richland, WA. The meeting concluded at 10:25 a.m.

Attachment #2

Agenda

Unit Managers Meeting
303-K Mixed Waste Storage Facility
Federal Building, Room 590-A
Richland, WA
May 6, 1992

- Status of Ecology's review
- New Business

Attachment #3

Attendance List

Unit Managers Meeting
303-K Mixed Waste Storage Facility
Federal Building, Room 590-A
Richland, WA
May 6, 1992

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Dave L. Banning	WHC	509-376-1057
Kerwin Donato	SWEC	509-376-8210
Kathy Knox	CNES	509-376-5011
Randall Krekel	RL	509-376-4264
Scott McKinney	Ecology	206-493-9425
Fred Ruck	WHC	509-376-9876
David Watson	WHC	509-373-3250

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Attachment #4

Commitments/Agreements Status List

Unit Managers Meeting
303-K Mixed Waste Storage Facility
May 6, 1992

ACTION ITEM

COMMITMENTS/AGREEMENTS STATUS LIST

- 5-7-91: 1 RL/WHC will send a letter to Ecology requesting approval of the sampling and analyses plan. Action: F. Ruck (WHC)
OPEN (Deferred pending receipt of Ecology's comments on Rev. 1 of the closure plan)
- 7-11-91: 1 Provide estimated date for sampling to take place on 303-K and 304 Concretion. Action: F. Ruck (WHC)
OPEN (Deferred pending receipt of Ecology's comments on Rev. 1 of the closure plan)
- 11-21-91: 1 RL/WHC will give the status of the site-wide Health & Safety Plan (HASP). Action: F. Ruck (WHC)
OPEN
- 11-21-91: 2 RL/WHC will give Ecology an example of a Hazardous Waste Operating Permit. Action: F. Ruck (WHC)
OPEN
- 11-21-91: 3 RL/WHC will arrange a site visit to the 304 Facility for Ecology. Action: E.A. Weakley (WHC)
CLOSED

Attachment #5

DEPARTMENT OF ECOLOGY
 NOTICE OF DEFICIENCY FOR
 THE 303-K RADIOACTIVE MIXED WASTE
 STORAGE FACILITY NOD RESPONSE TABLE
 Dated November 18th, 1991
 May 5, 1992

The following comments correspond to the numbers from the 303-K Radioactive Mixed Waste Storage Facility Closure Plan NOD Response Table, dated October 28th, 1991. Underlined numbers indicate changes made since the last NOD cycle. Proposals made in the following comments are accepted by Ecology:

	2	<u>3</u>	<u>4</u>	5	<u>6</u>	<u>7</u>	8	9	10	11	13
15	18	19	20	21	22	26	27	29	30	31	<u>34</u>
35	37	<u>38</u>	39	40	<u>41</u>	42	<u>43</u>	44	45	46	47
48	52	<u>53</u>	55	56	57	<u>58</u>	<u>59</u>	60	61	62	

The proposals made in the following comments are not accepted:

- | | Page/line# | |
|-----|------------|--|
| 1. | 1-1/44 | With the issuance of the SCR, DOE/WHC must decide on the probable closure approach for the 303-K unit. The SCR will have a widespread impact on this closure plan, and all sections that are affected must be modified to comply with the particular closure option chosen, and the SCR. If more than one option is chosen, or a change is made in the closure approach after sampling, the additional required elements of the closure plan must be submitted to Ecology for approval and incorporation. |
| 12. | 6-1/24 | This section must be revised to reflect the standards in the SCR policy. In particular, the 303-K closure standards will be either background, landfill standards, or the modified landfill standards and constituent concentrations found in the table of the SCR. |
| 14. | 6-2/1 | In order to expedite the determination of background values for concrete, Ecology is requiring that core samples of the roof in the south half of the building be taken. This location was chosen because it was not impacted by past practices, and it is reasonable to expect that it is composed of the same cement, sand, and aggregate mixture as the rest of the 303-K building. Four core samples must be drilled, with the center inch of the core sliced out, the aggregate removed, and the resulting sand/cement mixture analyzed. This approach will ensure statistical validity of the data, and that variations due to the aggregate will be minimized or eliminated. The technical details of this procedure will be discussed at future unit manager meetings. |
| 16. | 6-3/fig. | This flow chart must be modified to reflect the closure path |

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303-K Radioactive Mixed Waste
Storage Facility Closure Plan
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chosen for the 303-K unit, in accordance with the SCR. For example, the soil background levels box is not consistent with the SCR, since the SCR does not utilize local background levels. If two or more of the options under the SCR are chosen, each must either adhere to the flow chart, as modified, or each option must have it's own flow chart.

17. 6-5/15 The language in this section must be changed in accordance with the closure option pursued at the 303-K unit. Much of the language in this section of the closure plan must be modified to adhere to the SCR.
23. 7-3/7 The methods listed in Table 7-1 have some problems associated with them. Namely, there is a SW-846 method for chloride analysis, but the listed method is an EPA Method 300.00. Why was this method chosen over the SW-846 method? Why was SW-846 method 7061 chosen over 7060, knowing that chromium, nickel, mercury, and silver may be present? For mercury, SW-846 method 7471 may be more appropriate than 7470 for soil samples. Also, there is a typo on line 14, EPA is misspelled as EAP. Please review this table and provide the justifications for using the methods above, and correct the typographical errors. Ecology must approve any alternative method that is not listed in WAC 173-303-110.
24. 7-3/11 The proposed soil sampling is appropriate for determining the extent of contamination, however, soil remediation will comply with the SCR. Any appropriate changes to this section pursuant to the SCR must be made prior to approval of this plan.
25. 7-3/19 This table must be revised to comply with the SCR. All contaminants will be remediated to the standards specified in the SCR.
28. 7-3/27 This text must be revised to comply with the closure approach chosen for the 303-K unit.
32. 7-9/Section 7.3.2.4.4
See comment number 24.
33. 7-9/Section 7.3.2.4.4
The information describing whether these samples will be discrete over given areas or whether the intent is to composite has not been completely resolved in this section. It should be noted that Ecology discourages composite sampling except in limited applications where there is

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evidence that contamination will be uniform. Add detailed information on how the discrete samples will be taken (e.g., the top inch, a one inch layer between 11 and 12 inches below grade, etc).

36. 7-14/1 Soil cleanup standards are contained in the SCR policy. This section must be revised to comply with the SCR, and the closure option selected for the 303-K unit must be included. It may be appropriate to defer the selection of the closure option until after the sampling and analysis has been done, and the contamination levels at the unit are better understood.
37. 7-14/16 See comment number 14 regarding concrete sampling. Ecology proposes the use of this same process for determining asphalt background.
49. 7-27/39 As discussed at the December 19th, 1991 Unit Managers meeting, it may be acceptable to defer submittal of the Health and Safety Plan until just prior to sampling at the site. This is contingent upon the submittal of an example Hazardous Waste Operation Permit to Ecology. The exact details of the timing of HASP submittal and the sampling plan/closure plan approval will be discussed at future Unit Manager meetings. There must also be a reference in this section to the interim status contingency plan and training plan for this unit, as well as to the facility-wide contingency and training plans.
50. 7-28/12 There are portions of E.I.I. 4.2 that are not acceptable practices. For example, it is not acceptable at this facility to delay the marking of the accumulation date for suspected hazardous waste until after the waste has been verified as dangerous waste or it meets the requirements of section 6.4 of E.I.I. 4.2. In general, this document is open-ended and vague, and does not consistently comply with WAC 173-303. It is more efficient to write specific requirements for decontamination and interim storage of suspected dangerous waste into this closure plan than to try to change the E.I.I.'s.
51. 7-28/16 Ecology's position is still that the waste must be removed within 90 days of generation, not designation. When the quantity of waste in a satellite accumulation area exceeds 55 gallons, the 90 day storage limit starts. At the 303-K unit, there must be a designated storage area for wastes generated during cleanup activities.

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Storage Facility Closure Plan
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54. 7-29/Section 7.5

The schedule for the submittal of the decommissioning work plan may be aligned with the HASP. However, if there is insufficient detail in the closure plan regarding the decommissioning activities, it will be required to be submitted prior to approval of the closure plan. It is important that Ecology be provided drafts of these documents prior to the start of work, since problems in the plans could delay the approval of the closure plan.

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Distribution:

D.L. Banning WHC (H4-57)
J.D. Bauer RL (A5-15)
A.V. Beard RL (A6-55)
R.M. Carosino RL (A4-52)
C.E. Clark RL (A5-15)
D.L. Duncan EPA (HW-106)
G.D. Forehand WHC (B2-35)
C.C. Haass SWEC (A4-35)
D.M. Korematsu-
Olund WHC (H4-57)
R.N. Krekel RL (A5-15)
R.J. Landon WHC (B2-19)
S.J. Lijek SWEC (A4-35)
P.J. Mackey WHC (B3-15)
S.E. McKinney Ecology
S.M. Price WHC (H4-57)
F.A. Ruck III WHC (H4-57)
D.J. Watson WHC (X0-41)
E.A. Weakley WHC (L6-28)

GSSC RCRA UMM File, A4-35

ADMINISTRATIVE RECORD (303-K Mixed Waste Storage Facility) [Care of EDMC, WHC (H4-22)]

Washington State Department of Ecology, Nuclear and Mixed Waste Library, Mail Stop PV-11

Environmental Protection Agency, Region 10, Seattle, WA, MS HW-074

Please send comments on distribution list to Steve Lijek, SWEC (A4-35), 376-7829.

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