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**Meeting Minutes Transmittal - Approval**

**Unit Managers Meeting  
2727-S Nonradioactive Dangerous Waste Storage Facility  
2440 Stevens Center Building, Room 2519  
Richland, Washington**

**Meeting Held January 26, 1995  
1:00 PM - 4:00 PM**

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

*Ellen M. Mattlin* Date: 4/21/95  
Ellen M. Mattlin, Unit Manager, RL

Not Present Date: \_\_\_\_\_  
Dan E L. Duncan, RCRA Program Manager, EPA Region 10

*Robert E Cordts* Date: 2 May 95  
Robert E. Cordts, Unit Manager, Washington State Department of Ecology

2727-S NRDWS Facility, WHC Concurrence

*Fred A Ruck III* Date: 4/11/95  
Fred A. Ruck III, Contractor Representative, WHC



Purpose: Discuss Permitting Process

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

- Attachment 1 - Meeting Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - Comment Response Table for the 2727-S Nonradioactive Dangerous Waste Facility Clean Closure Evaluation Report WHC-SD-EN-TI-242, Rev. 0A.

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**Attachment 1**

**Unit Managers Meeting  
2727-S Nonradioactive Dangerous Waste Storage Facility  
2440 Stevens Center Building, Room 2519  
Richland, Washington**

**Meeting Held January 26, 1995  
1:00 PM - 4:00 PM**

**Agenda**

1. Approval of Past UMM Minutes
2. Status Action Items
  - NONE
3. Status Closure Activities
  - Clean Closure Evaluation Report
  - PE Certification of Closure
  - Site Restoration
    - Removal of Barrels and Demolition Debris
    - Restoration Letter
4. New Business
  - New Ecology Telephone Number
  - Closure Cost Estimates
5. Set Next Meeting Date

## Attachment 2

Unit Managers Meeting  
2727-S Nonradioactive Dangerous Waste Storage Facility  
2440 Stevens Center Building, Room 2519  
Richland, Washington

Meeting Held January 26, 1995  
1:00 PM - 4:00 PM

## Summary of Discussion and Commitments/Agreements

## 1. Approval of Past UMM Minutes

December UMM minutes were signed by the Ecology Unit manager and WHC only. The RL Unit Manager was not present for the December meeting.

## 2. Status of Action Items

- NONE

## 3. Status Closure Activities

## - Clean Closure Evaluation Report

WHC (Mr. S. M. Luke) indicated that the table of responses to all of Ecology's comments on the *2727-S Nonradioactive Dangerous Waste Facility Clean Closure Evaluation Report (CCER)*, WHC-SD-EN-TI-242, Rev. 0, has received RL concurrence and is ready for Ecology to review. The table was given to Ecology at this meeting and will be added as Attachment 5 to these meeting minutes.

WHC (Mr. S. N. Luke) re-stated the December UMM understanding that CCER (Revision OA) together with the comment response table would provide sufficient information for Ecology to determine if the unit qualifies for clean closure. Obtaining a written determination from Ecology would allow regulatory closure and revision of the report to proceed concurrently. The report will be revised in the most appropriate and cost-effective manner (e.g., page changes, addendum, errata sheets, full revision). Ecology (Mr. R. E. Cordts) reiterated that Ecology would provide RL with a written determination reflecting its position on the closure of this unit.

## - PE Certification of Closure

WHC is in the process of procuring the services of a professional engineer (PE) to verify completion of any further site restoration (if necessary) and to certify closure.

**- Site Restoration**

- **Removal of Barrels and Demolition Debris.** WHC (Mr. S. N. Luke) indicated that the barreled waste soils and pelletized piping that had been at the site since unit demolition were disposed of as nondangerous waste at Hanford's Central Waste Landfill on December 30, 1994.

- **Restoration Letter.** WHC (Mr. S. N. Luke) indicated that site restoration is the only remaining field activity to complete closure. Based on prior discussions with Mr. Joseph Witczak of Ecology, WHC is generating a letter that will pursue closure of the unit in its current physical state (i.e., without further site restoration). The letter will justify closing the unit as-is because it poses no threat to the environment, to the public or to site workers. Justification will be based on the unit's clean closure, 200 Area long term future land use considerations, and the location remaining a controlled access area for the foreseeable future. The letter will also compare the costs of the reduced scope closure to the costs of closure in accordance with the closure plan.

**4. New Business**

None.

**5. Set Next Meeting Date**

The next Unit Managers Meeting was scheduled as a video teleconference at the Federal Building in Richland from 2:00 PM to 4:00 PM on February 28, 1995.



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Attachment 4

Unit Managers Meeting  
2727-S Nonradioactive Dangerous Waste Storage Facility  
2440 Stevens Center Building, Room 2519  
Richland, Washington

Meeting Held January 26, 1995  
1:00 PM - 4:00 PM

Action Items

Action Item #

Description

NONE

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**Attachment 5**

**Unit Managers Meeting  
2727-S Nonradioactive Dangerous Waste Storage Facility  
2440 Stevens Center Building, Room 2519  
Richland, Washington**

**Meeting Held January 26, 1995  
1:00 PM - 4:00 PM**

*2727-S Nonradioactive Dangerous Waste Facility Clean Closure Evaluation Report  
WHC-SD-EN-TI-242, Rev. 0A, Comment Response Table*



2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY  
CLEAN CLOSURE EVALUATION REPORT  
COMMENT RESPONSE TABLE

January 23, 1995  
Page 2 of 5

No.	Comments/Response	<u>Concurrence</u>
2)	<p>Figure 1 identifies 2 X-ray Fluorescence (XRF) locations with the same sample number, B07528. Please explain or correct Figure 1.</p> <p><b>WHC Response:</b> Figure 1 will be corrected by replacing the XRF sample B07528 at the south end of the unit with sample number B07530. The XRF information, as indicated in Section 4.2.3.4 of the <i>2727-S Nonradioactive Dangerous Waste Storage (NRDWS) Closure Plan</i> (the Plan), DOE/RL 88-37, Rev. 3 A, was initiated for purposes of informational field screening. The XRF samples were taken at locations where analytical samples were taken, XRF information was not used in making closure decisions and XRF results were not otherwise included in the CCER.</p>	
3.	<p>How can rejected selenium and thallium data be used to meet the requirement for such data.</p> <p><b>WHC Response:</b> Analytical results for selenium and thallium indicate less than 1 ppm for these constituents in all samples (0.60 to 0.65 ppm). These data were rejected by the validation process due to a surrogate spike recovery of zero. The zero recovery most likely occurred because a spike was not added to QC sample B07532MS (page 87 of the lab report). However, when a spike was added to QC sample B07540MS (page 89 of the lab report), the result indicated acceptable recovery rate for the spike.</p> <p>There is no Hanford Site Background (DOE/RL 1993b) value for selenium (Se; CAS #7782-49-2) or for thallium (Tl; CAS #7440-28-0). Neither is recognized as a carcinogen by IRIS (CCER reference EPA 1988a) through assignment of a cancer potency factor (CPF). Both have an oral reference dose (RfD) that, using MTCA B formulas, can be used to calculate residential soil cleanup levels under which the unit may clean close. The residential level for selenium is 400 ppm, indicating that it is not a major concern in the environment. The residential level of thallium is 5.6 ppm for thallium.</p>	

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## Distribution:

J. K. Bartz	GSSC	R3-82
R. M. Carosino	RL	A4-52
R. E. Cordts	Ecology - Lacey	
D. L. Duncan	EPA	HW-106 (Seattle)
M. J. Furman	RL	R3-80
S. N. Luke	WHC	H6-23
P. J. Mackey	WHC	B3-15
E. M. Mattlin	RL	A5-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
R. R. Thompson	WHC	H6-23
G. T. Thornton	PNL	P7-68
H. T. Tilden	PNL	P7-68
J. L. Waite	WHC	B2-35
GHL/RCRA File	WHC	H6-23
Field File Custodian		H6-08

ADMINISTRATIVE RECORD: 2727-S Nonradioactive Dangerous Waste Storage Facility, S-2-5 [Care of EPIC, WHC (H6-08)]

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

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

Please send comments on distribution list to Scott Luke (H6-23), 372-1667.