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Final

Meeting Minutes Transmittal/Approval
300 Area Solvent Evaporator Closure Plan
Unit Managers Meeting
450 Hills, Room 47
Richland, Washington

Meeting Held January 3, 1991

Appvl. Clifford E. Clark Date: 1/25/91
Clifford E. Clark, Environmental Policy and Permitting, DOE-RL

Appvl. Not Present Date: _____
Daniel L. Duncan, EPA Region X Unit Manager

Appvl. David J. Watson Date: 2/27/91
David J. Watson, Contractor Representative, WHC

Appvl. Joseph Witczak Date: 1/25/91
Joseph Witczak, Unit Manager, Washington State Department of Ecology

PURPOSE: Discuss permitting process.

Meeting Minutes are attached. Minutes are comprised of the following:
Attachment #1 - Summary of Meeting Discussion and Commitments
Attachment #2 - Agenda
Attachment #3 - Attendance List
Attachment #4 - Commitments/Agreements Status



Attachment #1

300 Area Solvent Evaporator Closure Plan
450 Hills, Room 47
Richland, Washington
January 3, 1991

Summary of Discussion

This meeting was held to discuss December 1990 Unit Managers business. The December Unit Managers Meeting was delayed until January 3, 1991 due to scheduling conflicts.

It was agreed that the next 300 ASE meeting will be held on January 25, 1991 to discuss January 1991 business.

1. Extension Letter

The letter requesting a time extension to February 1, 1991 for submittal of NOD responses to Ecology is currently under revision. WHC (Fred Ruck) anticipates mailing the letter to Ecology next week. The submittal will include closure plan text page changes as well as responses to Ecology's NOD comments. Draft responses to the NODs will be provided at the January 25, 1991 Unit Managers Meeting.

2. NOD #6 - Cleanup to Background

Ecology (J. Witczak) inquired as to DOE/WHC's response on the cleanup of listed waste constituents to background and what the planned action would be if surface soil sample results indicated the presence of these constituents.

WHC (F. Ruck) has prepared a draft response to this NOD which has not as yet been reviewed by DOE-RL. If solvents are detected in the soil then the clean closure objective would be set aside and a postclosure plan would be developed. Ecology recommended that the NOD response and plan text changes be written so as to preserve both options: Clean closure if cleanup to background is possible, and submission of a postclosure plan and permit application if sampling indicates that this isn't achievable. DOE-RL (C. Clark) explained that the content of such a plan would be to maintain surveillance of the area until the CERCLA remedial action is conducted on Operable Unit 300-FF-2. Ecology (J. Witczak) stated that closure activities could be considered complete if all parties agree that no further actions are required. The language of the response and the text of the plan should not imply that DOE/WHC will not attempt to comply with the Dangerous Waste Regulations which require cleanup to background. If the decision is made to not remediate soils, then a postclosure permit application could be submitted to Ecology for approval. This document would cover the facility until the CERCLA action is performed.

3. NOD #4 - Assessment of Both Inorganics and Organics

Ecology (J. Witczak) inquired about DOE/WHC's proposed response to this NOD comment which states that the concrete foundation and slab need to be assessed for inorganic as well as organic constituents. WHC (Fred Ruck) has drafted a three-page response to this NOD which needs to be reviewed by DOE. WHC (D. Watson) stated that determination of the feasibility of tracing

inorganic contamination to evaporator operations by association with evaporator solvents must await review of the sample results.

4. Sampling

Ecology (J. Witczak) advised DOE/WHC that they are now able to proceed with the sampling and analysis work for 300 ASE. DOE (C. Clark) did not wish to proceed without written approval from Ecology due to a problem which has occurred at the LERF unit due to the absence of a written approval. DOE has been informed by Ecology that all approvals must be in written form. DOE suggested that Ecology approve the sampling plan as part of a written response to the NOD table submission. Mr. Mihalic of WHC, who was present to attend the 183-H UMM, suggested that Ecology's approval to proceed with sampling be written into the minutes and that this may serve as sufficient documentation. DOE (C. Clark) pointed out that there is nothing in writing which states that agreements reached in the Unit Managers Meetings and documented in the minutes are legally binding. Mr. Witczak was of the opinion that signed minutes are sufficient and that he would stand behind actions based on this form of approval documentation. Mr. Witczak explained that if the sampling were performed and the results indicated that there was no soil contamination, then the cleanup performance standards would not have to set, thus avoiding the background problem.

Ecology asked if there were any practical impediments to proceeding with the sampling work. WHC (D. Watson) mentioned the need for DOE-HQ approval of the NEPA categorical exclusions and the need for an approved contract laboratory to perform the analyses. WHC (S. Clifford) mentioned that the purchase order for a thermal desorption unit is being written currently. The equipment will likely be available in late spring or early summer.

5. Closure cost Estimate

Ecology (J. Witczak) stated that closure cost estimates could be provided via the facility reporting requirements. The estimate would need to be in the same level of detail as required by non-governmental PSDs and be updated annually. This mechanism would avoid tacit admission by DOE and/or WHC that they are financially responsible. This would be the case if the cost estimate were provided in the plan in compliance with 173-303-620 WAC. Ecology will provide DOE a letter via a 183-H response which will describe the above decision and provide additional guidance on the level of detail which the estimate should contain. The closure plan must contain a sentence that commits DOE to delivering the cost estimate as a separate facility report by October 1, 1991.

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WHC (S. Clifford) inquired as to whether this condition would go into the site-wide RCRA permit. Ecology (J. Witczak) responded that it would not, but rather it would be an appendix to each closure plan. WHC (S. Clifford) expressed concern about the cost of updates of the estimate which would require issuing an addendum to all the closure plans each year. Ecology agreed that this was a valid point and would devote some thought to a less expensive alternative mechanism.

6. November Minutes

WHC (D. Watson) had comments on the draft minutes from the November meeting which he wanted incorporated prior to signing. These comments will be

sent to SWEC for incorporation and the minutes will be signed at the January 25, 1991 meeting.

7. Action Items Update

The Action Items were reviewed and the status is as follows:

- 11-28-90:1 The letter requesting a time extension on the submission of the response table is currently being revised and should be sent to Ecology by January 11, 1991.
- 11-28-90:2 Draft NOD response will be provided at the UMM meeting scheduled for January 25, 1991.
- 11-28-90:4 The sampling and analysis plan will address pulverizing concrete sample and the use of a thermal desorption unit. The plan will not be part of the official closure plan. WHC is to provide Ecology with a draft of this plan for their informal review.

8. The next meeting is scheduled for January 25, 1991 in Richland, Washington

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Attachment #2

300 Area Solvent Evaporator Closure Plan
450 Hills, Room 47
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January 3, 1991

Agenda

- o Discussion of Notice of Deficiency Responses.
- o New Business

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Attachment #3

300 Area Solvent Evaporator Closure Plan
450 Hills, Room 47
Richland, Washington
January 3, 1991

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u> __
Cliff Clark	DOE/ERD	509-376-9333
Sam Clifford	WHC	509-376-5137
Lori Huffman	DOE-RL	509-376-0104
Chuck Johnson	SWEC	509-376-7829
Joe King	SWEC	509-376-4726
Fred Ruck III	WHC	509-376-9876
Rex Thompson	WHC	509-373-4894
Joe Witczak	Ecology	206-438-7557
Dave Watson	WHC	509-373-3250
Ev Weakley	WHC	509-376-6122

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Attachment #4

January 3, 1991

Commitments/Agreements Status

300 Area Solvent Evaporator Closure Plan

<u>Action Items</u>	<u>Commitments/Agreement Status List</u>
11-28-90:1	<p>A letter will be sent to Ecology formally requesting an extension of the NOD response deadline from 12-21-90. Action: Cliff Clark.</p> <p>OPEN The letter is under revision and will be out by 1-14-91</p>
11-28-90:2	<p>WHC will prepare draft responses to NODs for January 25, 1991 UMM. Action: Fred Ruck.</p> <p>OPEN Draft NOD response will be provided at the UMM meeting scheduled January 2, 1991.</p>
11-28-90:3	<p>WHC will prepare final responses to NODs by February 1, 1991. Action: Fred Ruck.</p> <p>OPEN</p>
11-28-90:4	<p>A Sampling and Analysis Plan Procedure will be developed to provide information for the pulverizing of concrete for laboratory analysis and the use of a thermal desorption unit. Action: Fred Ruck.</p> <p>OPEN This sampling and analysis plan will address pulverizing concrete samples and the use of a thermal desorption unit. The plan will not be part of the official closure plan. WHC is to provide Ecology with a draft of this plan for their informal review.</p>

Distribution:

J.D. Bauer	WHC	(B3-15)
L.A. Bracken	DOE	(A6-95)
L.C. Brown	WHC	(H4-51)
R.M. Carosino	DOE	(A4-52)
G.D. Carpenter	WHC	(H4-15)
C.E. Clark	DOE	(A6-95)
S.S. Clark	DOE	(A6-55)
S.B. Clifford	WHC	(H4-57)
W.T. Dixon	WHC	(B2-35)
G.T. Dukelow	WHC	(R2-97)
D.L. Duncan	EPA	(WW-W2)
C.J. Geier	WHC	(H4-57)
J.D. Hoover	WHC	(H4-57)
R.D. Izatt	DOE	(A6-95)
J.D. King	SWEC	(A4-35)
R.J. Landon	WHC	(B2-19)
D.W. Lindsey	WHC	(R2-82)
H.E. McGuire	WHC	(B2-35)
R.D. Pierce	WHC	(R2-80)
L.L. Powers	WHC	(B2-35)
S.M. Price	WHC	(H4-57)
L.W. Roberts	WHC	(R2-80)
R.J. Roberts	WHC	(R2-97)
F.A. Ruck III	WHC	(H4-57)
T.B. Veneziano	WHC	(B2-35)
D.J. Watson	WHC	(X0-41)
E.A. Weakley	WHC	(L6-28)
S.A. Wiegman	WHC	(B2-19)
J. Witczak	Ecology	
D. Brendel	CEES	
R.G. Gant	WHC	(L6-18)

ADMINISTRATIVE RECORD (300 Area Solvent Evaporator) [Care of Susan Wray, WHC (H4-22C)]

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