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Meeting Minutes Transmittal - Approved

Unit Managers Meeting
304 CONCRETION FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington

Meeting Held December 13, 1994
From 1:00 pm to 2:30 pm

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

Date: *Ellen Mattlin*
6-1-95
Ellen M. Mattlin, Unit Manager, RL

Not Present

Date: _____
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Date: *Scott E. McKinney*
5/23/95
Scott E. McKinney, Unit Manager, Washington State Department of Ecology

304 Concretion Facility, WHC Concurrence

Date: *Fred A. Ruck III*
6/7/95
Fred A. Ruck III, Contractor Representative, WHC

Date: *Ivan L. Metcalf*
6/6/95
Ivan L. Metcalf, 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 - Draft RL/WHC NOD Response Table Close-out Letter

Attachment 1

**Unit Managers Meeting
304 CONCRETION FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington**

**Meeting Held December 13, 1994
From 1:00 pm to 2:30 pm**

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
 - 9-23-94:1 Letter on NODs (Ecology)
3. Status Closure Activities
 - Status of Ecology's Review of Closure Plan Revision 2
 - Status of RL/WHC 304 Close-out Letter
 - Status of Sampling Activities
 - Status of Sampling Analysis Plan
 - Status of RL/WHC Confirmation Letter
4. New Business
5. Set Next Meeting Date

Attachment 2

Unit Managers Meeting
 304 CONCRETION FACILITY
 2440 STEVENS CENTER, RM 2519
 Richland, Washington

Meeting Held December 13, 1994
 From 1:00 pm to 2:30 pm

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The August 25, 1994; September 23, 1994; and October 13, 1994 meeting minutes were reviewed and approved. The November 22, 1994 meeting minutes were not ready for review at this meeting.

2. Status Action Items

9-23-94:1 Prepare a letter closing out previous NODs and transmitting this last NOD comment. Ecology (S. E. McKinney)

Ecology has not been able to prepare the letter. See "Status of Ecology's Review of Closure Plan Revision 2" for additional discussion of this issue.

This action remains open.

3. Status Closure Activities

- Status of Ecology's Review of Closure Plan Revision 2

Ecology (S. E. McKinney) stated at the last UMM that the work load for December 1994 would not allow, at this time, completion of a 304 Concretion Facility close-out letter.

- Status of RL/WHC 304 Close-out Letter

WHC (J. G. Adler) stated RL/WHC are preparing a letter to Ecology in an effort to close-out the 304 Concretion Facility notice of deficiency (NOD) response table. The letter identifies when the various NOD comments were closed. The letter includes the 68 NOD comments from revisions 0 and 1 of the closure plan and the one verbal NOD from the September 23, 1994 UMM. The letter will also transmit a copy of the NOD response table. Also, the letter recommends that work starts on the page changes to the 304 Facility Closure Plan. A draft copy of the letter is attached (attachment 5).

RL (E. M. Mattlin) asked Ecology on how they would respond. Ecology (S. E. McKinney) stated that the ideal response is a short letter

from Ecology to RL stating that Ecology agrees. Alternatively, if there is something that Ecology takes exception to, the letter would identify that and identify Ecology's position. However, the current expectation is that any corrections would come as permit conditions, and that the plan itself would not be revised at this time.

- Status of Sampling Activities

WHC (J. G. Adler) reported that sampling at the 304 Facility started to day. The wipe sampling portion has now been completed. The Ecology Unit Manager (S. E. McKinney) witnesses some of the sampling. As expected, there were minor field changes. For example, a duct into the building blocked off the random wipe sampling locations and the location had to be moved. These are expected and are documented in the sampling logbook.

Concrete core sampling, asphalt core sampling, soil sampling and concrete chip sampling are scheduled to start on January 3, 1995. The expected duration is 2 weeks. Ecology will be informed once the sampling date is confirmed.

- Status of Sampling Analysis Plan

WHC (J. G. Adler) reported that Ecology had granted verbal approval of the *Phase I Sampling and Analysis Plan for the 304 Concretion Facility Closure Activities* (WHC-SD-EN-AP-177) on November 22, 1994. Ecology (S. E. McKinney) confirmed the verbal approval.

- Status of RL/WHC Confirmation Letter

WHC (J. G. Adler) stated that RL/WHC was putting together a letter to Ecology confirming that verbal sampling authority had been granted and that RL/WHC intended to proceed with sampling. Ecology (S. E. McKinney) stated that Ecology can just as easily send out a confirmation letter to RL/WHC to an action (12-13-94:1) to complete such a letter. RL (E. M. Mattlin) and WHC agreed and stated then that the RL/WHC letter would be canceled.

4. New Business

- Status of Radioactive Asbestos Disposal

Ecology (S. E. McKinney) again asked about the disposal of radioactive asbestos at Hanford in general and from 304 Facility in particular. Ecology is concerned about the compliance status if the landfill is accepting radioactive asbestos. WHC (J. G. Adler) took an action (12-13-94:2) to investigate the matter further and report back at the next UMM. Information of specific interest is what regulations are governing disposal and into which trench is the asbestos being managed and disposed of?

5. **Set Next Meeting Date**

The next Unit Manager's Meeting has be tentatively scheduled for January 17, 1994 in Richland, WA and will be conducted via video teleconference.

Attachment 4

Unit Managers Meeting
304 CONCRETION FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington

Meeting Held December 13, 1994
From 1:00 pm to 2:30 pm

Action Items

<u>Action Item #</u>	<u>Description</u>
9-23-94:1 OPEN	Prepare a letter closing out previous NODs and transmitting this last NOD comment. Ecology (S. E. McKinney)
12-13-94:1 NEW 12/13/94	Prepare a letter confirming approval of the SAP. Ecology (S. E. McKinney)
12-13-94:2 NEW 12/12/94	Further investigate management/disposal of radioactive asbestos wastes. WHC (J. G. Adler)

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Attachment 5

Unit Managers Meeting
303-K STORAGE FACILITY
2440 STEVENS CENTER, RM 2519
Richland, Washington

Meeting Held December 13, 1994
From 1:00 pm to 2:30 pm

TITLE - Draft RL/WHC NOD Response Table Close-out Letter

DRAFT

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. J. J. Witczak, Unit Supervisor
Regulatory and Technical Support Unit
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Witczak:

CLOSE-OUT OF THE 304 CONCRETION FACILITY CLOSURE PLAN NOTICE OF DEFICIENCY
COMMENTS (M-20-14)

Ref.

- 1.) Stone Tablet, T. L. Nord, Ecology, to S. H. Wisness, RL, NOTICE OF DEFICIENCY FOR THE 303-K RADIOACTIVE MIXED-WASTE STORAGE FACILITY CLOSURE PLAN AND THE 304 CONCRETION FACILITY NOTICE OF DEFICIENCY RESPONSE TABLES, dated November 6, 1990
- 2.) Vellum Scroll, T. L. Nord, Ecology, to S. H. Wisness, RL, NOTICE OF DEFICIENCY FOR THE 304 CONCRETION FACILITY NOTICE OF DEFICIENCY RESPONSE TABLES, dated April 3, 1991
- 3.) Illustrated Manuscript, S. E. McKinney, Ecology, to A. Rodriguez, RL, NOTICE OF DEFICIENCY FOR THE 304 CONCRETION FACILITY NOTICE OF DEFICIENCY RESPONSE TABLE DATED OCTOBER 17TH, 1991, dated February 27, 1992.

The U.S. Department of Energy, Richland Operations Office (RL) and the Westinghouse Hanford Company (WHC) are submitting the completed 304 Concretion Facility Notice of Deficiency Response Table (NOD Response Table) (enclosed? attached? cocconned?) to the U.S. Environmental Protection Agency and State of Washington Department of Ecology (Ecology). This NOD Response Table includes the 68 written comments on revision 0 and revision 1 of the closure plan and the one verbal comment from revision 2 of the closure plan. The basis of determining completion of the NOD Response Table is discussed below. Also, RL and WHC recommend that the work on the final page change to the *304 Concretion Facility Closure Plan* (DOE/RL-90-03) should begin immediately.

As of the November 17, 1993 Unit Manager's Meeting, the status of the 68 notice of deficiency (NOD) comments from the *304 Concretion Facility Closure Plan* revisions 0 and 1 was discussed. The 68 NOD comments were determined either to have been closed by references 1, 2, and 3 or provisionally closed as of this UMM pending Ecology's review of revision 2 of the closure plan.

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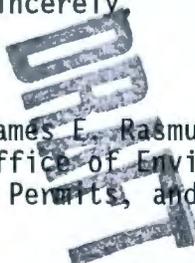
Revision 2 of the *304 Concretion Facility Closure Plan* was issued on November 30, 1993 for Ecology's review. At the September 23, 1994 UMM, the Ecology Unit Manager verbally indicated that the NOD comments (No. 1 through No. 68) from revisions 0 and 1 of the *304 Concretion Facility Closure Plan* had been adequately addressed in the revision 2 or in the *Hanford Facility Resource Conservation and Recovery Act Permit (Hanford Facility RCRA Permit)*. On this basis, all of the NOD comments (No. 1 through No. 68) from Ecology's review of revisions 0 and 1 of the *304 Concretion Facility Closure Plan* are considered to be resolved and closed as of September 23, 1994.

On verbal NOD comment on revision 2 of the *304 Concretion Facility Closure Plan* was provided by Ecology at the September 23, 1994 UMM. This comment noted that the closure plan section 8 'Postclosure' did not include the notice to the local land-use authority. At the October 13, 1994 UMM, RL and WHC verbally accepted Ecology's comment. This single Ecology comment and the RL and WHC response has been added to the attached?enclosed?cocooned? NOD Response Table as Comment No. 69.

With RL and WHC acceptance of Ecology's last verbal NOD comment (No. 69), RL and WHC consider the *304 Concretion Facility Closure Plan* workshops and NOD Response Table are complete. To prepare the closure plan for future public review and ultimate inclusion in the *Hanford Facility RCRA Permit*, work will begin immediately on the page change required to incorporate NOD Comment No. 69 into the *304 Concretion Facility Closure Plan*.

Should you have any questions, please contact Ms. E. M. Mattlin, RL on (509) 376-2385.

Sincerely,


James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy

Add Bill Dixon's signature.

Enclosure: 304 Concretion Facility Notice of Deficiency Response Table

cc w/encl:
Administrative Records
D. Duncan, EPA
S. McKinney, Ecology
D. Nylander, Ecology
F. Ruck III, WHC

cc w/o encl:
B. Burke, CTUIR
W. Dixon, WHC
R. Jim, YIN
D. Powaukee, NPT
S. Price, WHC

Distribution:

J. G. Adler	WHC	H6-23
J. K. Bartz	GSSC	R3-82
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	Seattle - HW-106
M. N. Jaraysi	Ecology	B5-18
A. B. Joy	RL	R3-79
P. J. Mackey	WHC	B3-15
E. M. Mattlin	RL	A5-15
S. E. McKinney	Ecology	Lacey
I. L. Metcalf	WHC	L6-26
S. M. Price	WHC	H6-23
D. E. Rasmussen	WHC	N1-47
J. A. Remaize	WHC	L6-26
F. A. Ruck III	WHC	H6-23
J. L. Waite	WHC	B2-35
RCRA File/GHL	WHC	H6-23
Field File Custodian	WHC	H6-08

ADMINISTRATIVE RECORD: 304 Concretion Facility, TS-3-2, [Care of EDMC, WHC (H6-08)]

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

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

Please send comments on distribution list to Kym D. Tartar (H6-23),
(509) 373-4701