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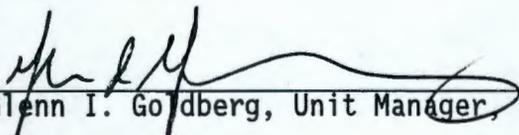
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Meeting Minutes Transmittal - Approval

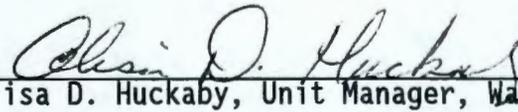
Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held February 18, 1994
11:00 AM - 12:00 PM

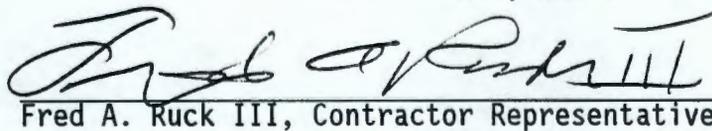
The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.


Glenn I. Goldberg, Unit Manager, RL Date: 6/16/94

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


Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology Date: 6/16/94

100-D Ponds, WHC Concurrence


Fred A. Ruck III, Contractor Representative, WHC Date: 6/16/94

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 - NOD Requested Information



9443278-0753

Attachment 1

Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held February 18, 1994
11:00 AM - 12:00 PM

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
3. Status Closure Activities
 - 100-D Ponds Closure Plan, Rev. 0, NOD
 - . Transmittal of NOD Response Table to Ecology and Confirmation of Receipt
 - . Status of Ecology Review of NOD Response Table
 - . Discuss NOD Responses/Issues
 - . Provide NOD Requested Information to Ecology
 - 100-D Ponds Sampling
 - . Transmittal to Ecology of Phase I Sample Data
 - . Phase II Sampling DQO Process
 - Discontinuation of Discharges to the 100-D Ponds
4. New Business
 - None
5. Set Next Meeting Date

9173278-0254

Attachment 2

Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held February 18, 1994
11:00 AM - 12:00 PM

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

January UMM minutes will require revision prior to Ecology approval and were not presented for signature.

2. Status of Action Items

- NONE

3. Status Closure Activities

- 100-D Ponds Closure Plan, Rev. 0, NOD

Transmittal of NOD Response Table to Ecology. WHC (Mr. S. N. Luke) indicated that the NOD Response Table had been transmitted to Ecology on 1/18/94 in conformance with the 1/20/94 due date for comments to Ecology. Ecology (Ms. A. D. Huckaby) confirmed receipt of the NOD Table by the 1/20/94 due date.

Status of Ecology Review of NOD Response Table. Ms. Huckaby indicated that she had not as yet been able to fully review the NOD Response Table but had taken a cursory look at some of the responses presented in the table.

Discuss NOD Responses/Issues.

NOD Issue resolution meeting. WHC (Mr. S. N. Luke) proposed that an issue resolution meeting be arranged in March to begin resolving NOD issues. The issue resolution process was explained as an informal process that has been helpful in the past in resolving NOD issues through categorizing responses by issue (e.g., DQO, groundwater monitoring) and by identifying the NOD responses that are acceptable to Ecology without further comment. RL (Mr. R. N. Krekel) indicated that Ecology management (Mr. Moses Jaraysi) had indicated a desire to begin discussions as quickly as possible in the NOD review process in order to gain consensus that may help shorten the review process.

Ecology (Ms. A. D. Huckaby) indicated that her ongoing review of the 4843 closure plan had not allowed her time to familiarize herself with the NOD responses and would further make being

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properly prepared for a March issue resolution meeting difficult. Further, due to the Ecology reorganization, she may not remain the Ecology reviewer for the closure plan and would therefore be uncomfortable with pursuing determinations that may not be consistent with the next Ecology reviewer.

NOD Responses/Issues. Ecology (Ms. A. D. Huckaby) voiced her view that the groundwater monitoring system for the unit and the barrier surrounding the unit both represent conditions that are not fully compliant.

Her concerns regarding the groundwater monitoring system centered upon downgradient well [D8-5]. The well's location and the manner in which its data was being used make it inappropriate for use in evaluating impact of the 100-D Ponds on groundwater. She felt that prior agreements establishing the present system were made in error and that another RCRA well would be required to bring the monitoring system for the unit into full compliance. She indicated that she had recently been made aware of budget constraints and processes making activities such as well acquisition difficult and subject to prioritization. Along these lines, an enhanced security barrier considered necessary to "modified" closure under MTCA regulations, may also have to undergo the same budget considerations. She recognized that to begin the budget process, agreement that groundwater monitoring and the present security barrier are not in compliance would be helpful.

RL (Mr. G. Goldberg) indicated that a meeting would be in order to ensure that the proper support people are together to properly address these issues. RL (Mr. R. N. Krekel) indicated that the issues of funding and compliance should be disassociated. The determination of compliance or noncompliance should first be made prior to securing funding for a new well. He further indicated that a review of the decisions involving the establishment of the groundwater monitoring could help justify the existing system.

Ecology responded that the NOD response justifying the system was not satisfactory. The determination of noncompliance was already made and that Ecology would be pursuing a new well. Her position and her response to the NOD responses regarding these issues would emphasize that it is the responsibility of the operator to be in compliance with regulations. As the matter now stands, without resolution of these two issues Ecology would have to pursue enforcement.

RL (Mr. R. N. Krekel) asked if the additional well was to be pursued as a compliance issue outside the closure process. Ecology responded that she would speak to her hydrologist who is also the Ecology lead for TPA Milestone M-24 for the installation of RCRA groundwater monitoring wells.

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Submittal of NOD Requested Information. WHC has obtained information requested by Ecology in NOD comments 1, 8, 13 and 41. Information as indicated in the table below will be mailed to Ecology.

NOD #	Information Requested	Document ID No. (where available)	Comments
1	RCRA Permit Application, Part A, Rev. 1	State ID No. WA7890008967 dated 9/1/87	Provided Already in Administrative Record.
8	Aerial Photos of the TSD unit	Photo # 90170-3 dated 6/20/90	Provided To be added to Administrative Record via 100-D Ponds Unit Manager Meeting Minutes.
13	Piping Drawings of the Process Sewer	1) Segment of Topographical Map H-13-000127 ***** 2) SK-1-7508 Plot Plan of 100D Area Process Sewer System dated 7/76. ***** 3) Unnumbered Sketch of 100D Process Sewers dated 4/28/50.	Provided To be added to Administrative Record via 100-D Ponds Unit Manager Meeting Minutes. ***** Provided To be added to Administrative Record via 100-D Ponds Unit Manager Meeting Minutes. ***** Provided To be added to Administrative Record via 100-D Ponds Unit Manager Meeting Minutes.
40	WHC-CM-7-7		Not Needed
41	WHC-SD-EN-DP-043, Rev. 0		Provided Already in Administrative Record.

- Discontinuation of Discharges to the 100-D Ponds

WHC indicated that it had received a letter from M. Selby indicating that she would sign the Class 3, TPA change request to modify the 216 Consent Order (Ecology Liquid Effluent Discharge Consent Order) sampling and analysis plan (SAP). The change request deletes further sampling of 183-D WTF discharges based on the unit ceasing all discharges to the 100-D Ponds by June 1994.

- 100-D Ponds Sampling

Confirmation of Receipt by Ecology of Phase I RCRA Sample Data. WHC (Mr. S. N. Luke) asked if Ecology had received the sample data that was sent by Express Mail by WHC. Ecology confirmed receipt of the data sheets.

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Phase II Sampling DQO Process. At this time WHC asked if Ecology would be interested in beginning the DQO process for the Phase II of sampling. She responded that for the same reasons that she did not want to enter issue resolution she did not want to enter the DQO process (e.g., ongoing review of 4843 not allowing time to become familiar with the sampling data).

4. **New Business - None.**
5. **Set Next Meeting Date**

The next Unit Managers Meeting was scheduled for March 17, 1994 in Richland.

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Attachment 4

Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held February 18, 1994
11:00 AM - 12:00 PM

Action Items

Action Item #

Description

NONE

09/20/94 07:28:16

Attachment 5

**Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 2200
Richland, Washington**

**Meeting Held February 18, 1994
11:00 AM - 12:00 PM**

NOD Requested Information

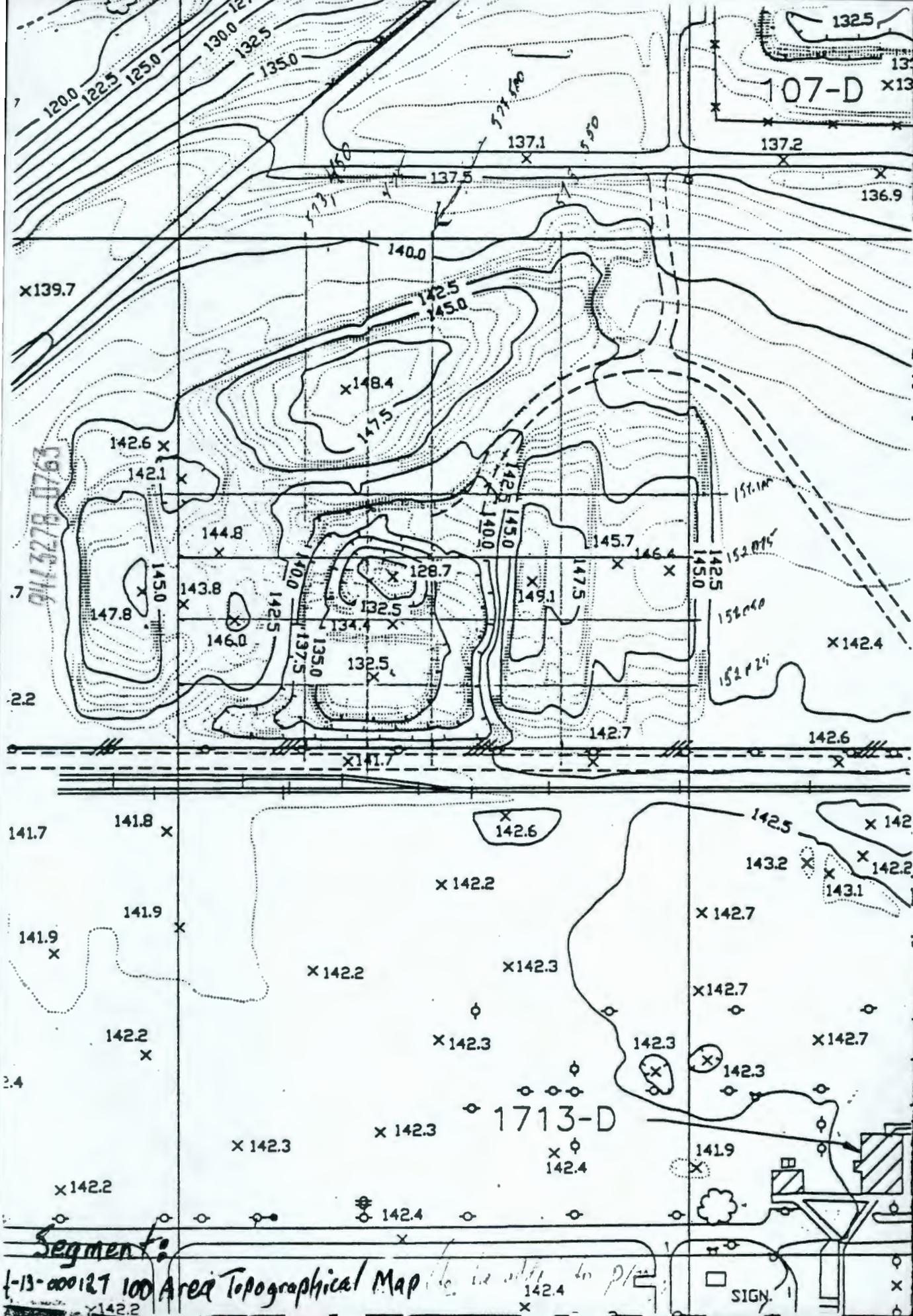
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GEORGE SACRAMENTO





Distribution:

J. K. Bartz	GSSC	B1-42
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	HW-106 (Seattle)
G. I. Goldberg	RL	A5-19
D. H. Herman	WHC	S2-12
R. N. Krekel	RL	A5-15
S. N. Luke	WHC	H6-23
P. J. Mackey	WHC	B3-15
R. G. McLeod	RL	A5-19
P. D. Mix	WHC	H6-29
S. M. Price	WHC	H6-23
A. D. Huckaby	Ecology	B5-18
F. A. Ruck III	WHC	H6-23
J. L. Waite	WHC	B2-35
J. J. Wallace	Ecology	B5-18
P. R. Staats	Ecology	B5-18
GHL/RCRA File	WHC	H6-23
Field File Custodian		H6-08

ADMINISTRATIVE RECORD: 100-D Ponds, D-1-1 [Care of EPIC, 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, Mail
Stop HW-074 (Record Center)

Please send comments on distribution list to Kari Schmidli (H6-23), (509)373-
2083

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