

START

0019372

October 4, 1991
Final

Meeting Minutes Transmittal/Approval

183-H Solar Evaporation Basins
Unit Managers Meeting
Federal Building, Room 180
Richland, Washington

Meeting Held August 22, 1991

183-H Solar Evaporation Basin, Unit Managers' Approval

Sandra L. Trine
Sandra L. Trine, DOE-RL, ERD Environmental Assessment Branch Date: 10/7/91

Joseph Witczak
Joseph Witczak, Washington State Dept. of Ecology Date: 10/7/91

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

Michael A. Mihalic
Michael A. Mihalic, WHC, Contractor Representative, HSFP Date: 10.7.91

Fred A. Ruck III
Fred A. Ruck III, WHC, Contractor Representative Date: 10/7/91

PURPOSE: Monthly status report.

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

- Attachment #1 - Summary of Discussion
- Attachment #2 - Commitments/Agreements Status List
- Attachment #3 - Attendance List
- Attachment #4 - Agenda



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Attachment #1

Summary of Discussion

183-H Solar Evaporation Basins
Unit Manager's Meeting
Federal Building, Room 180
Richland, Washington

August 22, 1991

The first topic of discussion were the open action items.

5-30-90:0 Ecology approval of the closure plan.

The arsenic (As) and lead (Pb) contamination found in the soil piles has prompted DOE (S. Trine) to delay submittal of the revised plan to Ecology. Ecology's letter dated August 7, 1991 on this subject could impact the closure schedule. Ecology (J. Witczak) requested that the plan be delivered as is and that schedule changes would be dealt with as later modifications. DOE will send the revised plan to Ecology within the next few days.

9-20-90:2 WHC to provide soil background data to Ecology.

Ecology needs a list of the values that DOE/WHC are using for background concentrations and the raw data on which they are based.

11-28-90:2 WHC will evaluate concrete rubble as fill.

WHC (M. Galbraith) can't do this until the results for the concrete samples are available. The unit managers decided to close this item because the required action is not unique - it applies to all basin media.

7-29-91:1 Ecology position on handling soil piles.

This item has been completed via Ecology's letter of August 7.

7-29-91:2 WHC to prepare a plan for additional sampling.

WHC (M. Galbraith) may prepare the plan considering the need to sample the ground at locations underneath the piles to a depth of six inches. If anomalous concentrations of As and Pb are discovered, then sampling will proceed outward from the basins to determine if the source of these metals is something other than the waste which was stored in the basins.

The remainder of the discussion focused on the soil piles and their disposition. WHC has reviewed the question of whether or not the piles are dangerous waste (DW) per the WAC. Only one pile designates and it is DW because the Pb concentration is greater than 100 ppm. Ecology pointed out that there are three criteria which are state specific - toxicity, persistence and carcinogenicity (EC%) - in addition to the four federal RCRA criteria.

Arsenic concentrations above 10 ppm are toxic DW. WHC needs to reconsider there preliminary designations. The TCLP test will determine whether or not the soil is restricted from being disposed in a landfill.

Action Item: WHC will ensure that the soil piles designation considered all seven WAC criteria. Soil pile designation will be discussed again at the next UMM.
Action: F. Ruck III

If WHC determines that the soil piles are not DW, then Ecology will need the complete data package to perform a concurrence review.

WHC has begun the process of obtaining a solid waste disposal contract for the material that does designate as DW but expects that it will not be able to ship material offsite before November 1991. Ecology wants the material that is DW to be containerized in drums or skid mounted boxes. If this action is undertaken, then Ecology will allow DOE more time to dispose of the waste. DOE (E. Goller) suggested that the soil piles be considered as investigation derived waste (IDW) and handled accordingly. Policy on handling of IDW is currently being negotiated between the Ecology, EPA and DOE. Ecology (J. Witczak) doesn't want to tie progress at 183-H to ancillary initiatives such as IDW or resolution of site-wide issues. So far, such linkage has been largely avoided and Ecology would like to continue in that mode. DOE (E. Goller) suggested that the As and Pb observed in the soil piles may not have come from waste handled at 183-H but rather from unassociated past practices. Coal piles and orchard sprays are possible candidates. If this is the case, then the soil piles should be remediated under the CERCLA action which will be performed on 100-HR-1 operable unit. Ecology would consider this a viable option if hard data supporting this hypothesis can be obtained.

Action Item: WHC will determine the most expeditious method of disposal of those soil piles which are dangerous waste and inform Ecology of this schedule. Action: F. Ruck

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WHC said that the waste indicator species such as copper and nitrate was not high occur in the samples that had the high As and Pb concentrations. To WHC, this means that the As and Pb are not likely to have come from the 183-H waste. The argument was also made that the known amount of arsenic disposed in the basins (about seven pounds into about 2 million gallons of liquid) was not enough to produce the concentrations observed in the soil. Ecology was not convinced by these arguments and felt that the additional sampling discussed previously needs to be performed. The vadose zone results will also be significant to Ecology in making a determination on the source of the As and Pb. If these metals are not found in high concentrations in the vadose zone but are found in outlying surface soils, then Ecology would be inclined to agree with the explanations advanced by DOE/WHC. DOE (S. Trine) also suggested that prior air photos of the site and vicinity be reviewed to see if orchards were present. Air photos may also help determine sources of soil used for basins.

In the interim, Ecology wants the soil that is DW to be containerized in either drums or skid mounted boxes. If this action is undertaken then Ecology will allow DOE more time to dispose of the waste.

WHC (M. Galbraith) said that the initial vadose zone soil results will be available sometime in October and the TCLP results on the soil piles will be available in about six weeks. ~~The draft sampling plan will be prepared within the next two to three weeks.~~ WHC has undertaken interim management measures such as pulling and drumming weeds from pile number two, moving soil which has sloughed back onto the plastic sheeting and spraying the disturbed soil with a binder. No interim measures can be performed on the trench at the moment because a rig is setup at this location.

DOE (S. Trine) responded to Ecology's prior phone request for the amount of arsenic that was disposed into the basins. There were seven pounds of sodium arsenate, one gallon of a 1 ppm solution and one quart of a 13 ppm solution for a total of about seven pounds of arsenic. The total volume of liquid stored in the basins was 2.1 million gallons. No As was detected in the sludge that was removed from the basins.

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Attachment #2

Commitments/Agreements Status List

183-H Solar Evaporation Basins
Unit Managers Meeting
Federal Building, Room 180
Richland, Washington

August 22, 1991

ACTION ITEM

- 5-30-90:0 Ecology approval of 183-H Solar Evaporation Basins Closure Plan. Action: Ecology.
OPEN
- 9-20-90:2 WHC will provide Ecology with a list of the values they are using for background concentrations and the raw data from which they were derived. Action: M. Galbraith
OPEN
- 11-28-90:2 WHC will evaluate the use of clean concrete rubble as fill material. Action: M. Galbraith
CLOSED
- 07-29-91:1 Ecology will review the information and get back to WHC with a position on the handling of the soil piles. Action: Joe Witczak
CLOSED
- 07-29-91:2 WHC/DOE will prepare a sampling plan for additional sampling to determine the source of the As and Pb found in the soil piles. Action: Matt Galbraith
OPEN

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08-22-91:1

WHC will ensure that the soil piles designation considered all seven WAC criteria. Soil pile designation will be discussed again at the next UMM.
Action: F. Ruck III

OPEN

08-22-91:2

WHC will determine the most expeditious method of disposal for the soil piles which are dangerous waste and inform Ecology of this schedule. Action: F. Ruck

OPEN

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Attachment #3

Attendance List

183-H Solar Evaporation Basins
Unit Managers Meeting
Federal Building, Room 180
Richland, Washington

August 22, 1991

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Clifford, Sam B.	WHC, Permits	509-376-5137
Galbraith, Matt	WHC, Cognizant Eng.	509-373-5387
Goller, Eric	DOE	509-376-7326
Johnson, Chuck	CNES, GSSC	509-376-7829
King, Joe	SWEC, GSSC	509-376-9707
Ruck, Fred	WHC	509-376-9876
Trine, Sandra L.	DOE, ERD	509-376-6943
Witczak, Joseph	Ecology, Unit Mgr.	206-438-7557

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Attachment #4

Unit Managers Meeting
183-H Solar Evaporation Basins
Agenda

August 22, 1991

- o Review, Amend, and Approve Prior Meeting Minutes
- o Status Prior Action Items
- o Discuss Closure Activities
 - D & D Activities
 - Phase II Sampling
- o Status Submittal of Page Changes to Recorded Document Holders
- o New Business

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Distribution:

M.J. Anthony	DOE	(A6-95)
E.A. Bracken	DOE	(A6-95)
L.C. Brown	WHC	(H4-51)
R.M. Carosino	DOE	(A4-52)
C.E. Clark	DOE	(A6-95)
S.B. Clifford	WHC	(H4-57)
D.L. Duncan	EPA	(HW-074)
K.R. Fecht	WHC	(H4-57)
M.J. Galbraith	WHC	(R2-77)
C.J. Geier	WHC	(H4-57)
E.D. Goller	DOE	(A5-19)
J.D. Goodenough	DOE	(A6-95)
J.D. King	SWEC	(A4-35)
R.J. Landon	WHC	(B2-19)
R.E. Lerch	WHC	(B2-35)
M.A. Mihalic	WHC	(L4-88)
H.E. McGuire	WHC	(B2-35)
M. Morton	WHC	(R2-77)
L.L. Powers	WHC	(B2-35)
R.E. Peterson	WHC	(H4-56)
F.A. Ruck III	WHC	(H4-57)
S.L. Trine	DOE	(A5-19)
T.B. Veneziano	WHC	(B2-35)
S.A. Wiegman	WHC	(B2-19)
J. Witczak	Ecology	

ADMINISTRATIVE RECORD (183-H Solar Evaporation Basins, T-1-4)
[Care of Susan Wray, WHC (H4-22C)]

Nuclear and Mixed Waste Library, Ecology, MS PV-11

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

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