

START

August 1, 1990
Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 303-K Mixed Waste Storage Facility and 304
Concretion Facility
Federal Building, Room G-57
Richland, Washington

Meeting Held July 10, 1990

303-K Mixed Waste Storage Facility and 304 Concretion, Unit Managers' Approval

Clifford E. Clark Date: 8/14/90
Clifford E. Clark, DOE-RL, ERD

(NOT PRESENT) Date: _____
Dan Duncan, EPA Region X

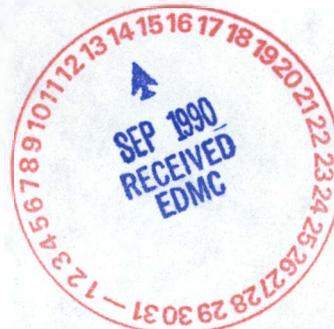
Dave Watson Date: 8/29/90
Dave Watson, WHC Contractor Representative

Megan Verchen Date: 8/17/90
Megan Verchen, Ecology Unit Manager

PURPOSE: Monthly status report.

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

- Attachment #1 - Meeting Summary of Discussion and Commitments
- Attachment #2 - Commitments/Agreements Status List
- Attachment #3 - Agenda for the meeting
- Attachment #4 - Attendance List
- Attachment #5 - Meeting Handouts



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Attachment #1

Meeting Summary

A. Closure Plan Discussion

Ecology commented that the closure plans did not contain enough detail indicating what the future use of the site will be and if the closure is going to be staged in phases or not. This lack of detail caused difficulty in reviewing the strategy and related sampling program. A discussion pursued on the intended strategy behind the closure plan and potential strategy that could be used for closure. Ecology acknowledged that a RCRA clean closure within a CERCLA unit is difficult. They outlined a potential strategy for clean closure of parts of a TSD unit within a CERCLA unit which consisted of a three phase program. This three phase program would consist of parts of a single closure plan for each unit. The first phase would consist of decontamination and sampling of the structures. If the structures are clean they could be clean closed and removed, if contaminated, they could also be removed but the materials would have to be appropriately disposed. The second phase would be to investigate the concrete and asphalt to determine if it could be clean closed. If they are clean, the pavement could be clean closed and removed, if contaminated, they could also be removed but the materials would have to be appropriately disposed. The third phase would consist of sampling the soils (sampling locations and analyses should be integrated with CERCLA data needs). The RCRA unit would then be closed and the balance of the clean up of the soils would be left to be done under the CERCLA unit. This phased approach reduces the potential for contamination of a site after sampling has taken place. For example, by taking down the structure, the sampled and designated "clean" pavement surrounding the building could become contaminated and sampling would need to be repeated.

If clean closure of the units does not take place, a post closure plan needs to be developed. If the clean up of the soils is to local background and the balance of the soil contamination is left for clean up under CERCLA, the RCRA post closure plan will have to state that post closure will be under CERCLA.

B. Sampling

A discussion pursued on sampling strategies and the following points were made. Target sampling with a small percentage of random samples is a preferred strategy for the establishment of the presence of contamination. The soil sampling plan should be integrated with the CERCLA needs so that number of samples and analyses will be kept to a minimum and fulfill both program's data requirements. The selection of analyses analytes should be based on historic past practices at the site, with scattering of full list analyses.

Ecology commented that a table added into the text listing the analytes and the SW-846 test method used in the determination would greatly help in reading and understanding the sampling plan.

C. Comments on Ecology NODS

NODs, 303-K, # 41, 42

WHC asked what Ecology was looking for in a response to these NODs. Ecology replied that a recommended approach could be to state that 95% of the samples will be targeted samples along the cracks with 5% of the samples located at random.

NOD 304, #64

Ecology asked for clarification and more detail as to what the greenhouse refers to in the closure plan. WHC replied that it is a decontamination set up consisting of standard plastic and two-by-four construction and that they would elaborate in the reply.

The discussion turned to the list of Ecology comments compiled by DOE/WHC (Attachment #5). The following discussion pursued on each item:

1. Already addressed in the meeting.
2. Already addressed in the meeting.
3. Ecology would like to see the criteria used for selection of sample analytes be based on past practices at the site with a few, full scans. Process definition for past and present operations will need to be discussed in greater detail since this is the bases for analyte selection. Ecology also stated that it would be helpful if maps were presented showing the locations of past spills.
4. Sampling and Analysis has been discussed.
5. A description of training and who is receiving what training and at what levels needs to be added to the closure plan per WAC regulations. The use of 616 and 2101-M ponds response could be altered to fit the 303-K and 304 sites.
6. Already addressed in the meeting.
7. The letter from Ecology covers this item. Ecology commented that in general terms, the closure plans did not contain enough detail.

Action Item #1: The NOD responses to Ecology comments will be sent to Ecology by September 6th. Action DOE/WHC

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D. General Discussion

A discussion pursued covering the need for a generic closure plan. The use of the approach and language used in the 183-H soil sampling plan could be used as a model for future closure plans since this plan has already been through the regulator review process. The generic plan would then be altered to fit site specific requirements.

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ACTION ITEM

COMMITMENTS/AGREEMENTS STATUS LIST

Action Item #1: The NOD responses to Ecology comments will be sent to Ecology by September 6th. Action DOE/WHC

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Attachment #3

Agenda

July 10, 1990

303-K Mixed Waste Storage Facility
304 Concretion Facility
Unit Managers Meeting
Federal Building, Room G-57
Richland, Washington

1:00 p.m

- A. 304 Concretion Facility Closure Plan
General discussion on the NOD comments

Questions
Clarifications

Closure strategy discussion

RCRA/CERCLA interface

- B. 303-K Mixed-Waste Storage Facility

General discussion on the NOD comments

Questions
Clarifications

Closure strategy discussion

RCRA/CERCLA interface

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Attachment #4

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Davey Banning	WHC	509-376-1057
Stacey Benfer	SWEC	509-376-3217
Bill Cox	WHC	509-376-1978
Cliff Clark	DOE/ERD	509-376-9333
Suzanne Clark	DOE/OPD	509-376-9055
Jil Frain	WHC	509-376-8941
Mike Gasser	SWEC	509-376-9830
Jim Hoover	WHC	509-376-2668
Megan Lerchen	Ecology	206-438-3089
Fred Ruck III	WHC	509-376-9876
Dave Watson	WHC	509-373-3250
Everett Weakley	WHC	509-376-6122

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Ecology Comments

<u>Item #</u>	<u>Comment Category</u>	303-K RMW	304 Conc.
#1	Inconsistencies	0	0
#2	CERCLA/RCRA Interface	6	8
#3	Historical Information/ Process Definition	7	10
#4	Sampling and Analysis	19	25
#5	Legal/Administrative/Training	15	13
#6	Closure Strategy	14	9
#7	Errors/Omissions	1	3

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Distribution:

J.D. Bauer WHC (B3-15)
D.L. Banning WHC (H4-57)
S.A. Benfer SWEC (A4-35)
E.A. Bracken DOE (A6-95)
R. Brown Ecology
R.M. Carosino DOE (A4-52)
C.E. Clark DOE (A6-95)
S.S. Clark DOE (A6-55)
W.G. Cox WHC (H4-57)
D. Duncan EPA
J.M. Frain WHC (H4-55)
C.J. Geier WHC (H4-57)
J.D. Hoover WHC (H4-57)
R.D. Izatt DOE (A6-95)
R.J. Landon WHC (B2-19)
M.E. Lerchen Ecology
L.L. Powers WHC (B2-35)
F.A. Ruck III WHC (H4-57)
D.J. Watson WHC (X0-41)
E.A. Weakley WHC (L6-28)
J. Witczack Ecology

ADMINISTRATIVE RECORD (303-K Mixed Waste Storage Facility and 304 Concretion)
[Care of Susan Wray, WHC (H4-51C)]

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