

DISTRIBUTION
PROJECT MANAGERS' MEETING,
200 AREA GROUNDWATER SOURCE OPERABLE UNITS
September 20, 2012

DOE/RL

(No hard copy distribution)

EPA

Craig Cameron

B1-46

Ecology

Nina Menard

H0-57

CHPRC

Lorna Dittmer (original)

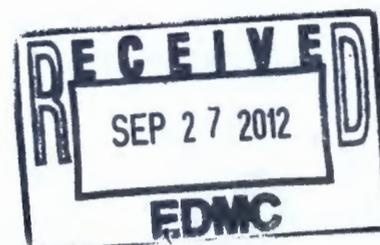
H8-45

Administrative Record (2)

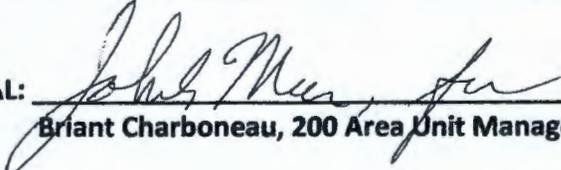
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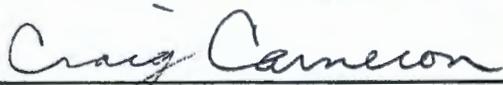
Correspondence Control

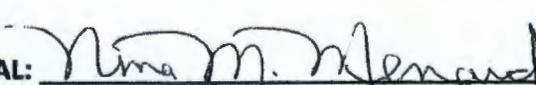
A3-01



Meeting Minutes Transmittal/Approval
Project Managers' Meeting
200 Area Groundwater and Source Operable Units
September 20, 2012

APPROVAL:  DATE: 9/20/12
Briant Charboneau, 200 Area Unit Manager, DOE/RL

APPROVAL:  DATE: 9/20/12
Craig Cameron, 200 Area Project Manager, EPA

APPROVAL:  DATE: 9/20/12
Nina Menard, 200 Area Project Manager, Ecology

HFFACO Action Plan Section 4.1 requires signature of agreements and commitments made during the Project Manager Meeting. Approval of these minutes documents approval of agreements and commitments documented in Attachment 4 to these minutes. Approval does not apply to any other attachments, which are included in these minutes for informational purposes.

**Minutes of the 200 Area Project Managers' Meeting of September 20, 2012 are attached.
Minutes are comprised of the following:**

Attachment 1	Attendance Record
Attachment 2	Agreements and Issues List
Attachment 3	Action Item List
Attachment 4	Operable Units and Facilities Status
Attachment 5	EPA Concurrence Email Regarding Discontinue Purging of 299-W23-19 (200-UP-1)
Attachment 6	Path Forward on M-37-03 TSD Closure Plan Preparation; Email between DOE and Ecology, dated September 19, 2012

**200 Area Project Managers' Meeting
Agreements and Issues List
September 20, 2012**

Agreement: The 200 Area PMM will be held quarterly beginning with the first quarter of the federal 2013 fiscal year. The next meeting will be held on November 15, 2012.

Issue: None

Announcements: None

Delegations for September 20, 2012 PMM meeting:

DOE/RL John Morse for Briant Charboneau

**200 Area Project Managers' Meeting
September 20, 2012**

CHPRC-1203468
Attachment 3

OPEN ACTION ITEM TRACKING

Action #	Action/Subject	Assigned To	Owed To	Assigned Date	Original Due Date	Adjusted Due Date	Status
137	PNNL's draft report summarizing the results from study to assess/refine the soil clean up level for carbon tetrachloride and methylene chloride needs to be added to the PW 1, 3, 6 Administrative Record File. Report is expected to be issued by end of March 2012 for review.	CHPRC contact	Administrative Record	2/16/12	6/1/12	9/30/2012	Open
138	Meeting between Ecology, EPA and DOE to discuss Central Plateau risk assessment strategy and how they will relate to 200-IS-1	DOE	EPA, Ecology	6/21/12	?		Open; dependant on TPA renegotiations.
139	EPA would like a courtesy review of the SVE treatability test report before the document becomes publicly available	DOE	EPA	6/21/12		10/31/2012	Open
140	The Tri-Parties to meet regarding monitoring of the Hanford Prototype Barrier within 30 days.	EPA	All	9/20/12			Open

200 AREA PROJECT MANAGERS MEETING
PROJECT STATUS UPDATES

September 20, 2012
AGENDA

CENTRAL PLATEAU INNER AREA

200-WA-1

200-PW-1 SVE

Inner Area: Central Plateau Burial Grounds

200-SW-2

Inner Area: Central Plateau Deep Vadose Zone

200-DV-1 RI/FS

200-BC-1/200-WA-1 Tc-99 Desiccation Test

BOTH INNER & OUTER AREAS

200-IS-1CMS & FS / CAD & PP

CENTRAL PLATEAU OUTER AREA

200-SW-1

CENTRAL PLATEAU GROUNDWATER

200-ZP-1 Interim Action

200 West P&T

200-UP-1 RI/FS

S/SX Interim Action

200-BP-5 TTP

200-BP-5 and 200-PO-1 FS

FUTURE SCOPE (out-year TPA milestones and projects)

200-DV-1 Uranium

200-PW-1/3/6 and 200-CW-5 ROD implementation

B Plant Canyon/Waste Sites

200-CW-1, 200-CW-3, 200-OA-1

TSD Units

200-DV-1

200-BC-1 and 200-WA-1

200-EA-1

200BP-5, PO-1

PUREX Canyon/Waste Sites

224B Concentration Facility

200-EA-1 & 200-IS-1

REDOX Canyon/Waste Sites

U Plant Canyon

EE/CA Report(s)

224T Transuranic Storage and Assay Facility

GW Plumes

200 AREA PROJECT MANAGERS MEETING
PROJECT STATUS UPDATES

September 20, 2012

CENTRAL PLATEAU INNER AREA

200-WA-1 EPA Lead

- **M-015-91A: Submit a RI/FS work plan for the 200-WA-1 OU (200 West Inner Area) to EPA, 12/31/2011(Complete).** (RL- Kevin Leary, CHPRC – Marty Doornbos)
 - The Draft A 200-WA-1 OU Work Plan was transmitted to EPA on December 27, 2011, meeting the milestone.
 - High level comments were provided by EPA on May 15, 2012.

Schedule Status: RL and EPA to self-perform to incorporate comments. Expect completion by March 31, 2013.

Regulatory Agency Comments: N/A

200-PW-1 Soil Vapor Extraction System (SVE): (RL-John Morse CHPRC –Mark Byrnes)

- The SVE units by Z-9 (#1) and Z-1A (#2) were re-started April 2, 2012. Both SVE units are back running smoothly after air conditioning was repaired and one gas chromatograph replaced.
- The failed air conditioners in the SVE units have been repaired or replaced.
- The passive SVE system is continuing to operate.
- PNNL's treatability test report summarizing the results from a study to assess/refine the soil clean up level for carbon tetrachloride and methylene chloride is currently being revised by CHPRC based on comments received from DOE. It will be issued final by September 30, 2012. Once the report is issued final, it will be added to the PW 1, 3, 6 Administrative Record.
- Evaluation of FY 2013 operations is ongoing.

Schedule Status: The active SVE units will continue operation through October 31, 2012 when they will be shut down for the winter.

Regulatory Agency Comments: N/A

Inner Area: Central Plateau Burial Grounds

200-SW-2 Ecology Lead

- **M-015-93A: Submit Revised RFI/CMS & RI/FS work plan for the 200-SW-2 OU to Ecology, 12/31/2011 (Complete)** (RL – Doug Hildebrand, CHPRC – Marty Doornbos)
 - The Draft A 200-SW-2 OU Work Plan was transmitted to Ecology on November 7, 2011, meeting the milestone.
 - Ecology provided comments on the Draft A 200-SW-2 OU Work Plan on August 10, 2012.

Schedule Status: Comment incorporation is not funded in FY13.

Regulatory Agency Comments: N/A

Inner Area: Central Plateau Deep Vadose Zone

200-DV-1 Ecology Lead (RL – John Morse, CHPRC – Marty Doornbos)

- The B Area perched water removal system continues to operate at a rate of approximately 2,000 gallons per week. Through the end of August, 59,865 gallons of effluent have been removed from the perched water zone this fiscal year.

Regulatory Agency Comments: EPA and Ecology recommend that this continue to operate.

200-DV-1 Ecology Lead (RL – John Morse, CHPRC – Glen Chronister)

- **M-015-110C: Submit uranium treatment technology field test plan as an element of the RFI and RI for the 200-DV-1 OU to Ecology, 12/31/2010 (Complete)**
 - **Schedule Status:** The sequestration test has been deferred based on funding prioritization.

Regulatory Agency Comments: N/A

200-BC-1/200-WA-1 Tc-99 Desiccation Test EPA Lead (RL – John Morse, CHPRC – Glen Chronister)

- **M-015-110D: Submit technetium-99 pilot scale treatability study test report(s) as an element of the RI for the 200-BC-1/200-WA-1 OUs to EPA, 6/30/2012 (Complete)**
 - The active/operations portion of the Desiccation Pilot Test was completed on June 30, 2011. System is currently in post-test monitoring.

Regulatory Agency Comments: N/A

BOTH INNER & OUTER AREAS

200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Marty Doornbos)

- **M-015-90: Submit Revised RFI/CMS & RI/FS work plan for 200-IS-1 to Ecology, 12/31/2011 (Complete).**
 - The Draft A 200-IS-1 OU Work Plan was transmitted to Ecology on November 14, 2011, meeting the milestone.
 - Ecology comments on the Draft A 200-IS-1 OU Work Plan were received on April 2, 2012.

Schedule Status: Comment incorporation is not funded in FY13.

Regulatory Agency Comments: N/A

CENTRAL PLATEAU OUTER AREA

200-SW-1 Ecology Lead (RL- Kevin Leary, CHPRC – Marty Doornbos)

- EA released for public review August 29, 2011. The last of the public comments were received on November 17, 2011.

Schedule Status: Responding to public comments and revising the EA is not funded in FY13.

Regulatory Agency Comments: N/A

TSD Units Ecology Lead (RL – Greg Sinton, CHPRC – Marty Doornbos)

- **M-037-03: Submit Revised Closure Plans to support TSD closure for two (2) TSD Units: 216-B-3 Main Pond system, and 216-S-10 Pond and Ditch, 4/30/13**

Schedule Status: See Attachment 6 for path forward.

Regulatory Agency Comments: N/A

CENTRAL PLATEAU GROUNDWATER

200-ZP-1 Interim Action EPA Lead (RL – John Morse, CHPRC – Mark Byrnes)

- The above ground lines for the two extraction wells that historically pumped water to ETF will be triple rinsed by the end of September 2012.
- The CY 2011 and CY 2012 Annual Performance Reports have been issued.

Schedule Status: Completed

Regulatory Agency Comments: N/A

200 West Area GW Treatment Facility EPA Lead (RL – John Morse, CHPRC – Mark Byrnes)

- **M-016-122, Begin Phase 1 Operation of 200W P&T System, 12/31/2011 (Complete)**
 - During the month of August, the 200 West P&T system operated for 17 days. It operated during daylight hours only at a pumping rate between 900 and 1,150 gpm. During the days the system was off line, maintenance and repair work was performed on the plant.
 - Both fluidized bed reactors are now on line.
 - The radiological treatment building is now online removing Tc-99 from selected wells near the TX-TY and T Tank Farms as well as from the vicinity of the S-SX Tank Farm.
 - Analytical testing has shown the plant is successfully reducing the concentration of contaminants below cleanup levels specified in the Record of Decision.
 - On August 25, 2012 a leak was discovered in the Bio Building caused by a failed saddle on a 6-inch utility water line. The sump in the building overflowed. The water was removed and transported to Modu Tanks via tanker trucks. The system was back running again on August 28, 2012.
 - Plant tours continue to be run routinely.

Schedule Status: Operations efficiencies and completed construction punch list items continue to improve pumping rates towards the goal of treating 2,000 gpm.

Regulatory Agency Comments: N/A

200-UP-1 RI/FS EPA Lead (RL – Naomi Bland, CHPRC – Curt Wittreich)

- **M-015-17A: Submit a 200-UP-1 RI and FS Report and PP to EPA, 9/30/2010 (Complete)**
 - The Rev.0 RI/FS report and Proposed Plan were finalized and issued. Public review of the Proposed Plan started on July 17, 2012 and was completed on August 16, 2012. An initial draft of the Responsiveness Summary and interim ROD, that will supersede the current IROD, was prepared by EPA for EPA Legal/DOE review.

Schedule Status: M-015-17A is complete

Regulatory Agency Comments: N/A

S/SX Tank Farm Interim Action EPA/Ecology Lead (RL – Naomi Bland, CHPRC – Curt Wittreich)

- **M-016-120: GW Treatment System for Tc-99 Plume at S/SX Tank Farm utilizing the new 200 West Pump and Treatment Facility, 8/31/2012**
 - Startup of the S/SX extraction system occurred on August 13, 2012. EPA concurred that TPA milestone M-16-120 will be met by initiating groundwater flow through the S/SX extraction system to the 200 West Treatment Facility.
 - The quarterly (1,000 gal) purging of monitoring well 299-W23-19 located within the SX Tank Farm will be terminated as an interim ROD activity. The RD/RAWP states that the “purging of well 299-W23-19 will continue until replacement by WMA S/SX pump-and-treat operations”, which is now operating. See Attachment 5 for email documenting EPA approval to discontinue.
 - TPA Change Notice 542, “200-UP-1 RD/RAWP revision to remove language requiring purging well 299-W23-19,” was provided to EPA for signature.

Schedule Status: Complete: TPA Milestone M-016-120 (August 31, 2012) was met on August 13, 2012 with the initiation of pumping and treatment of S/SX groundwater.

Regulatory Agency Comments: N/A

200-BP-5 TTP Ecology Lead (RL – John Morse, CHPRC – Curt Wittreich)

- **M-015-82A: Submit Treatability Test Plan as Amendment of 200-BP-5 WP, 12/31/2010 (Complete)**
- **M-015-82B: Initiate 200-BP-5 Aquifer Tests Within 6 months of TTP Approval, approval of TPP + 6 months (Delayed)**
 - Treatability Test construction was completed, but due to FY 2012 funding constraints, performance of the test is delayed. The treatability test extraction system has been placed in a safe-store configuration.

Schedule Status: M-015-82A is complete.

Regulatory Agency Comments: N/A

200-BP-5, PO-1 FS Ecology Lead (RL – John Morse, CHPRC – Curt Wittreich)

- **M-015-21A, Submit a 200-BP-5 and 200-PO-1 OU FS Report and PP(s) to Ecology, 6/30/2015**
 - The Rev.0, 200-PO-1 RI Report was released August 27, 2012.

Schedule Status: On schedule.

Regulatory Agency Comments: N/A

FUTURE SCOPE (out-year TPA milestones and projects)

2014:

200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Marty Doornbos)

- **M-015-112: Submit Draft B 200-IS-1 OU Pipeline System Waste Sites RFI/CMS/RI/FS WP to Ecology, including a schedule of completion dates for major tasks and deliverables, 2/28/2014.**

200-SW-2 Ecology Lead (RL- Doug Hildebrand, CHPRC-Marty Doornbos)

- **M-015-113: Submit Draft B, 200-SW-2 Radioactive Landfills Group RFI/DMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables.**

B Plant Canyon/Waste Sites Ecology Lead (RL – Naomi Bland, CHPRC – Marty Doornbos)

- **M-85-10A, Submit RI/FS work plan for the 200-CB-1OU (B Plant Canyon/associated past practice waste sites) to Ecology, 6/30/2014**

200-CW-1, 200-CW-3, 200-OA-1 EPA Lead (RL –Greg Sinton, CHPRC –Marty Doornbos)

- **M-015-38B, Submit a revised FS Report and revised PP(s) for 200-CW-1, 200-CW-3, and 200-OA-1 OUs for Waste Sites in the Outer Area of the Central Plateau to EPA, 10/30/2014**

TSD Units

- **M-037-02, submit Revised Closure Plans to support TSD closure for five (5) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench, 06/30/2014**

2015:

200-DV-1 Ecology Lead

- **M-015-110A: Submit RFI/CMS & RI/FS work plan for the 200-DV-1 OU to Ecology. The work plan shall include technology screening that identifies technologies applicable for characterization, treatment, and monitoring of Deep Vadose Zone contaminants, 3/31/2015 (RL – John Morse, CHPRC – Marty Doornbos)**
- **M-015-110B: Submit CMS & FS and PP/PCAD for the 200-DV-1 OU to Ecology, 9/30/2015 (RL – John Morse, CHPRC – Marty Doornbos)**

200-BC-1 and 200-WA-1 EPA Lead (RL- Kevin Leary, CHPRC – Marty Doornbos)

- **M-015-91B: Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1/200-WA-1 operable units (200 West Inner Area) to EPA, 12/31/2015**

200-EA-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Marty Doornbos)

- **M-015-92A, Submit a RFI/CMS & RI/FS work plan for the 200-EA-1 OU (200 East Inner Area) to Ecology, 6/30/2015**

200-BP-5, PO-1 Ecology Lead (RL – John Morse, CHPRC – Curt Wittreich)

- **M-015-21A: Submit a 200-BP-5 and 200-PO-1 OU FS Report and PP(s) to Ecology, 6/30/2015**

200-PW-1/3/6 and CW-5 ROD Implementation EPA Lead (RL- Greg Sinton, CHPRC – Marty Doornbos)

- **M-016-125: Submit a Remedial Design/Remedial Action Work Plan for 200-CW-5 and 200-PW-1/3/6 to EPA as described in Section 12.4 of the associated ROD, 9/30/2015**

PUREX Canyon/Waste Sites Ecology Lead (RL – Naomi Bland, CHPRC – Marty Doornbos)

- **M-85-20A: Submit RI/FS Work Plan for 200-CP-1 OU (PUREX Canyon/associated past practice waste sites) to Ecology, 9/30/2015**

224B Concentration Facility Ecology Lead (RL- Kevin Leary, CHPRC – Marty Doornbos)

- **M-085-50: Submit revised removal action work plan for the 224B Concentration Facility in accordance with the Action Memorandum for the Non-Time Critical Removal Action for the 224-B Plutonium Concentration Facility (DOE/RL-2004-36). A change package with a completion milestone will accompany the submittal of the work plan. 12/31/2015**

2016 and beyond:

200-EA-1 & 200-IS-1 Ecology Lead (RL- Doug Hildebrand, CHPRC – Marty Doornbos)

- **M-015-92B: Submit CMS & FS Report(s) & Proposed CA Decision(s)/PP(s) for the 200-EA-1 and 200- IS-1 OUs (Central Plateau 200 East Inner Area) to Ecology, 12/31/2016**

REDOX Canyon/waste sites EPA Lead (RL – Naomi Bland, CHPRC – Marty Doornbos)

- **M-85-30A, Submit RI/FS Work Plan for 200-CR-1 OU (REDOX Canyon/associate past practice waste sites) to EPA, 12/31/2017**

U Plant Canyon EPA Lead (RL – Wade Woolery, CHPRC – TBD)

- **M-016-200A, Complete U Plant Canyon (221-U) demolition in accordance with the RD/RAWP, 9/30/2017**
- **M-016-200B, Complete U Plant Canyon (221-U) barrier construction in accordance with the RD/RAWP, 9/30/2021**

EE/CA Report(s) EPA/Ecology Lead (RL – Bobby Long, CHPRC, TBD)

- **M-85-60, Complete EE/CA report(s) for all Tier 2 facilities listed in Appendix J, 3/31/2018**

TSD Units

- **M-037-11, Complete unit-specific closure requirements for two (2) TSD Units; 216-B-3 Main and Pond system and 216-S-10 Pond and Ditch, 9/30/2016**
- **M-037-10, Complete Unit-Specific Closure Requirements According To The Closure Plan(s) For seven (7) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A36B Crib, 216-A-37-1 Crib, 216-B-63 Trench, Hexone Storage and Treatment Facility (276-S-141/142), and 241-CX Tank System (241-CX-70/71/72), 9/30/2020**

224T Transuranic Storage and Assay Facility *EPA Lead* (RL- Kevin Leary, CHPRC – Marty Doornbos)

- **M-085-51, Submit removal action work plan for the 224T Transuranic Storage and Assay Facility in accordance with the Action Memorandum for the Non-Time-Critical Removal Action for the 224-T Plutonium Concentration Facility (DOE/RL-2004-68). A change package with a completion milestone will accompany the submittal of the work plan. 12/31/2025**

GW Plumes *EPA/Ecology Lead* (RL – John Morse)

- **M-016-119-T01, Remedy in Place to Contain GW Plumes in 200 NPL Area, 12/31/2020**

From: [Chronister, Glen B](#)
To: [Jaraysi, Tara](#)
Subject: FW: Discontinue Purging of 299-W23-19 (200-UP-1)
Date: Wednesday, September 05, 2012 12:17:52 PM

Tara,

E:mail attachment documenting EPA approval to discontinue purging of well 299-W23-19. To be used as an attachment for the PMM.

*Thanks,
Glen B. Chronister
(509) 373-4160*

From: Wittreich, Curtis D
Sent: Wednesday, September 05, 2012 12:16 PM
To: Chronister, Glen B
Subject: FW: Discontinue Purging of 299-W23-19 (200-UP-1)

From: Wittreich, Curtis D
Sent: Wednesday, August 29, 2012 12:20 PM
To: David E Dooley (David_E_Dooley@rl.gov); Barrett, William F; John P McDonald (John_P_McDonald@rl.gov)
Cc: Biebesheimer, Frederick H; William R Faught (William_R_Faught@rl.gov); Dittmer, Lorna M; Fred A Ruck III (Fred_A_III_Ruck@rl.gov); Rick W Oldham (Richard_W_Oldham@rl.gov); ^S&GRP Communications Team
Subject: Discontinue Purging of 299-W23-19 (200-UP-1)

Per EPA's note below we may discontinue the quarterly purging at well 299-W23-19.

Curt

From: Bland, Naomi M
Sent: Wednesday, August 29, 2012 9:46 AM
To: Wittreich, Curtis D
Cc: Morse, John G
Subject: FW: Proposal to Discontinue Purging of 299-W23-19 (200-UP-1)

FYI

From: Emerald Laija [<mailto:Laija.Emerald@epamail.epa.gov>]
Sent: Tuesday, August 28, 2012 7:46 AM
To: Bland, Naomi M
Cc: Morse, John G
Subject: Re: Proposal to Discontinue Purging of 299-W23-19 (200-UP-1)

Naomi,

EPA concurs with the discontinuation of purging at well 299-W23-19 since the S-SX extraction system is now operating.

Thanks,
Emy

Emerald Laija, Environmental Scientist
U.S. Environmental Protection Agency
Hanford Project Office
309 Bradley Blvd, Suite 115
Richland, WA 99352
Phone: 509 376-4919
Fax: 509 376-2396
E-mail: laija.emerald@epa.gov

▼ "Bland, Naomi M" ---08/27/2012 02:32:24 PM---Emy, DOE would like to discontinue the quarterly (1,000 gal) purging of monitoring well 299-W23-19,

From: "Bland, Naomi M" <naomi.bland@ri.gov>
To: Emerald Laija/R10/USEPA/US@EPA
Cc: "Morse, John G" <john.morse@ri.gov>
Date: 08/27/2012 02:32 PM
Subject: Proposal to Discontinue Purging of 299-W23-19 (200-UP-1)

Emy,

DOE would like to discontinue the quarterly (1,000 gal) purging of monitoring well 299-W23-19, located in the southern portion of Waste Management Area (WMA) S-SX. The approved 200-UP-1 RD/RA WP, DOE/RL-97-36, Revision 3 states that the "purging of well 299-W23-19 will continue until replacement by WMA S-SX pump-and-treat operations".

Because the new S-SX extraction system is now operational, DOE recommends that the quarterly purging of 299-W23-19 stop, as it is no longer required and is effectively replaced by a more robust extraction system that will capture the area of this well.

Section 6.2 of the RD/RAWD is as follows:

6.2 Well 299-W23-19

Ecology, 2009 added the requirement to sample well 299-W23-19 on a quarterly basis for Tc-99. After sampling, the well will be purged at a minimum of 3,800 L (1,000 gal) until concentrations of Tc-99, only at well 299-W23-19, are less than or equal to 10 times the MCL (i.e., less than or equal to 9,000 pCi/L) for four consecutive quarters. **Purging of well 299-W23-19 will continue until replacement by WMA S-SX pump-and-treat operations.** The contaminated groundwater will be subject to the same management, treatment, and disposal requirements as those for extracted groundwater described in Section 6.1. The progress toward achieving this RAO will be documented annually.

Please let me know if EPA concurs.

Thank you
NB

From: [Sinton, Gregory L](#)
To: [Menard, Nina \(ECY\)](#); [Welsch, Kim \(ECY\)](#)
Cc: [Sinton, Gregory L](#)
Subject: RE: Path forward on M-37-03 TSD closure plan preparation
Date: Wednesday, September 19, 2012 12:40:12 PM

This looks good to me. I fixed one typo (inclusions to inclusion) and a few other things (there were some extra words) in item 6. I'll bring this email exchange to the PMM for incorporation in the minutes.

From: Menard, Nina (ECY) [mailto:nmen461@ecy.wa.gov]
Sent: Wednesday, September 19, 2012 12:20 PM
To: Sinton, Gregory L; Welsch, Kim (ECY)
Subject: RE: Path forward on M-37-03 TSD closure plan preparation

Greg,

Below are my suggested changes. Mostly it centers around the "quarterly permit modification package" Andrea Prignano has informed me that the quarterly modification packages are for Class 1 changes only and that adding a closure plan will be either a Class 2 or 3. Other than the changes below, this path forward for the M-37-03 TSD closure plan process is acceptable to Ecology.

Thank you for meeting with us.

Nina M. Menard
Environmental Restoration
WA Dept. of Ecology
509-372-7941 Office
509-420-6839 Cell

From: Sinton, Gregory L [mailto:gregory.sinton@rl.gov]
Sent: Wednesday, September 19, 2012 9:49 AM
To: Menard, Nina (ECY); Welsch, Kim (ECY)
Cc: Sinton, Gregory L
Subject: Path forward on M-37-03 TSD closure plan preparation

Nina/Kim: I thought possibly we should document our discussion yesterday concerning the path forward on the closure plans in the PMM. I have summarized the main points below. If/when these plans change we can update in a future PMM. I would propose that if you agree with this description, just respond that you agree and then I will take it to the 200 PMM tomorrow and provide it to be included with the minutes.

The Ecology project manager and RL project manager's representative met on September 18, 2012 to discuss tentative plans to achieve the 4/30/13 M-37-03 Interim Milestone to submit revised closure plans for the 216-B-3 Main Pond and 216-S-10 Pond and Ditch. The tentative path forward is as described below.

- 1) Ecology will provide drafts of the two closure plans to RL by approximately the end of November 2012.

- 2) RL and CHPRC will review the plans and revise if deemed necessary.
- 3) RL will submit the two plans to Ecology by 4/30/13
- 4) Ecology and RL will review and resolve comments (NODs) on the submittals per the section 9.2 of the TPA Action Plan
- 5) Based on the initial Ecology review of the submittal to determine the extent of NODs (if any), Ecology and RL will discuss timeframes for completion of the process, which may be significantly shorter than the timeframes indicated in Figure 9.2 depending on the extent and difficulty of NODs.
- 6) When the NOD process is completed and there is agreement on the closure plans RL and CHPRC will certify the closure plans and submit them for inclusion in the permit ~~as part of a quarterly permit~~ **[Menard, Nina (ECY)]** as a permit modification package.

The submittal to meet the 4/30/13 milestone will not require certification because this may not be the final version. Once the NOD process is completed and the final version is available, a certified package **[Menard, Nina (ECY)]** closure plans will be submitted as ~~part of~~ a permit modification. If Revision 9 of the permit is not yet in effect, the package may be submitted in advance for incorporation into the permit when Revision 9 is in effect.