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Meeting Minutes Transmittal - Approved

Unit Managers' Meeting
183-H Solar Evaporation Basins
Federal Building, Room 784-B
Richland, Washington

0039661

Meeting Held September 20, 1994
From 3:00 to 4:00 p.m.

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

Nancy A. Weirde Date: 12/15/94
Nancy A. Weirde, Unit Manager, RL

NOT PRESENT

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

Robert E. Cordts Date: 15 Dec 94
Robert E. Cordts, Unit Manager, Washington State Department of Ecology

183-H Solar Evaporation Basins Closure, Contractor Concurrence:

A.W. Pappin Date: 12-15-94
Contractor Representative, ERC

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



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Meeting Held September 20, 1994
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Agenda

1. Approval of Past UMM Minutes
 - The July 6, 1994, Unit Managers Meeting minutes were reviewed and signed by the Unit Managers.
2. Status Action Items
 - 03-02-93:1 Closure proposal, pending the following:
 - i. resolution of soil cleanup extent and thresholds
 - ii. review of the data evaluation report
 - iii. RCRA/CERCLA coordination
 - 07-18-94: Regulatory review of data evaluation report
 - 08-09-94:1 Listed waste letter
3. Status Closure Activities/Planning
 - Vadose zone data validation
 - Letter: listed waste constituents
 - RCRA-CERCLA coordination
 - Debris Rule
 - Shot-peening verification
 - EPA background document
 - Soil Cleanup levels
 - Nitrate cleanup level via WAC 173-340-740(3)a)iii)
 - Status of modeling
 - Site restrictions, to enable direct soil cleanup levels
 - Hanford Facility RCRA Permit compliance
 - V.1.B.j and V.1.B.k (submittal of soil & concrete data package)
 - V.1.B.g. (notification that closure has begun)
 - Closure Plan amended by proposal and subsequent doc.
 - Summary of open and resolved issues
 - Attached
4. New Business
5. Set Next Meeting Date

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Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes
 - The July 6, 1994, Unit Managers Meeting minutes were reviewed and signed by the Unit Managers.
[The August minutes are being reviewed currently.]
2. Status Action Items
 - 03-02-93:1 Closure proposal, pending the following:
 - i. resolution of soil cleanup extent and thresholds
 - ii. review of the data evaluation report
[R. E. Cordts (Ecology) expects to issue a list of his concerns regarding the data evaluation report.]
 - iii. RCRA/CERCLA coordination
 - 07-18-94: Regulatory review of data evaluation report
[Refer to previous agendum]
 - 08-09-94:1 Listed waste letter
[L. A. Mihalik (CHI) acknowledged that this letter is behind schedule; it is still in internal review.]
3. Status Closure Activities/Planning
 - Vadose zone data validation
[D. P. Butcher (CHI) stated that the contractors have evaluated alternatives for resolving questions concerning this validation package, and would relay specific options to RL shortly. One of GSSC's concerns from last years' review of the validation is the qualifying criteria for duplicate analyses. The WHC procedure that was used for validation qualified as estimated any data that exceeded 20 relative percent difference (RPD) between duplicate analyses. EPA typically uses 35 RPD for soil duplicate analyses.]
 - Letter: listed waste constituents
[Discussed under action items.]
 - RCRA-CERCLA coordination
[R. E. Cordts expects that cleanup in the 100 Areas will be coordinated such that cleanup goals are consistent area-wide. L. A. Mihalik said that Hanford personnel would work toward achieving this coordination; R. E. Cordts concurred. Note: RL has requested of Ecology (R. E. Cordts) that 183-H soil be remediated under CERCLA authority (July 6 and August 18 Unit Managers meetings, July 21 telephone communication with D. P. Butcher). A definitive response has not yet been received.]
 - Debris Rule
 - Shot-peening verification
[R. E. Cordts is inquiring into the viability of shot-peen removal of the concrete matrix to a depth of 6 mm, with a some resistant aggregate protruding above the 6 mm level.]

- EPA background document
[D. P. Butcher mailed Debris Rule (Land Disposal Restrictions) EPA background documentation to R. E. Cordts September 19, 1994.]
- Soil Cleanup levels
 - Nitrate cleanup level via WAC 173-340-740(3)a)iii)
[R. E. Cordts accepted an action item to provide a direct soil exposure nitrate cleanup level, or information enabling RL to do so.]
 - Status of modeling
[D. P. Butcher stated his opinion that the Summer's model is unrealistically conservative; it does not explicitly allow for vadose transport time. In addition, refinement of the distribution coefficients used currently in Hanford soil modeling applications is needed. L. A. Mihalik pointed out that modeling results may be irrelevant; it could be decided that Hanford groundwater will not be used as drinking water.]
 - Site restrictions, to enable direct soil cleanup levels
[Responding to R. E. Cordts suggestion that direct soil exposure cleanup levels may be allowable if groundwater usage in the basins' vicinity is restricted, L. A. Mihalik explained that the CERCLA Proposed Plans currently being prepared are considering restrictions on groundwater usage. According to draft plans, groundwater would not be used as drinking water within the Hanford Site boundaries.]
- Hanford Facility RCRA Permit compliance
 - V.1.B.j and V.1.B.k (submittal of soil & concrete data package)
[R. E. Cordts requested a letter formalizing that the submittal of the data evaluation report fulfills these permit conditions.]
 - V.1.B.g. (notification that closure has begun)
[L. A. Mihalik will send a letter formalizing this notification, as required in this permit condition.]
 - Closure Plan amended by proposal and subsequent doc.
[L. A. Mihalik proposed that the closure plan be amended, with current information and strategy, by addendum, or section changes. R. E. Cordts suggested that closure activities would follow Ecology's approval, and if any time conflicts occurred, the mechanism for documenting compliance was less important than substantive closure actions.]
- Summary of open and resolved issues
 - Attached

4. New Business

[No new business was discussed.]

5. Set Next Meeting Date

[The next meeting was tentatively planned as a video-teleconference at 3:00, October 25, in room 784-B of the Federal Building.]

Attachment 4

**Unit Managers' Meeting
183-H Solar Evaporation Basins
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Richland, Washington**

**Meeting Held September 20, 1994
From 3:00 to 4:00 p.m.**

Action Items

<u>Action Item #</u>	<u>Description</u>
03-02-93:1	F. A. Ruck (WHC) will make a proposal for closure of the 183-H Basins that will include a new closure date. This action item remains open. As a result of contractor change, this action is conferred to Brian Mathis (CHI).
08-18-94:1	L. A. Mihalik (CHI) will issue a letter requesting that the concrete be released from consideration as listed waste. Due September 1, 1994.
09-20-94:1	R. E. Cordts (Ecology) will evaluate debris rule compliance of 6 mm basin concrete removal with a fractional area of resistant aggregate protruding above the 6 mm level.
09-20-94:2	R. E. Cordts (Ecology) will provide means to produce a direct soil exposure nitrate cleanup level, assuming that the value calculated from WAC 173-340-740 (3)(a)(iii) is unacceptable.
09-20-94:3	L. A. Mihalik will provide letter(s) addressing compliance with the Hanford Facility RCRA Permit conditions V.1.B.g, V.1.B.j and V.1.B.k.
09-20-94:4	R. E. Cordts will review the 183-H Data Evaluation Report.

Distribution

J. K. Bartz	GSSC	R3-82
D. P. Butcher	CHI	H6-23
R. M. Carosino	RL	A4-52
R. E. Cordts	Ecology-Lacey	
L. D. Dillon	BHI	H6-29
D. L. Duncan	EPA-Seattle	HW-106
P. W. Griffin	CHI	X5-55
C. W. Hedel	BHI	H4-79
R. G. Hollenbeck	KEH	G3-17
P. K. Jackson	BHI	H4-79
M. Jaraysi	Ecology-Kennewick	
R. N. Krekel	RL	A5-15
B. W. Mathis	BHI	H4-79
M. A. Mihalic	BHI	X5-53
L. A. Mihalik	CHI	H4-79
N. A. Werdel	RL	A5-19
L. R. Miller	CHI	X5-53
J. M. Nickels	BHI	H4-86

ADMINISTRATIVE RECORD: 183-H Solar Evaporation Basins Closure, T-1-4 [Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to Don Butcher (H6-23), 373-2606.