

# START

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LOW LEVEL BURIAL GROUNDS  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington

July 22, 1993  
2:30 p.m. - 3:00 p.m.

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

RC Bowman For Date: 8/24/93  
Clifford E. Clark, Unit Manager, RL  
(Represented by R. C. Bowman, WHC)

RC Bowman For (Per Video conference) Date: 8/24/93  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

RC Bowman For (Per Video conference) Date: 8/24/93  
Robert E. Cordts, Unit Manager, Washington State Department of Ecology

Low Level Burial Grounds, WHC Concurrence

[Signature] Date: 8/24/93  
Richard D. Pierce, Contractor Representative, WHC  
(Represented by Barbara Broomfield, WHC)

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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**Attachment 1**

**LOW LEVEL BURIAL GROUNDS  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington**

**July 22, 1993  
2:30 p.m. - 3:00 p.m.**

**Agenda**

1. PREVIOUS MEETING MINUTES
2. PROGRAM STATUS
  - Status of Design and Construction Schedule
3. PERMIT APPLICATION STATUS
4. RCRA TOPICS
  - Discussion of 4-9-93 NOD Response Table
5. GENERAL TOPICS
  - Action Items
    - Past Action Items
    - New Action Items
  - Schedule Next Meeting Date
    - Tentative Dates
    - Proposed Topics

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Attachment 2

LOW LEVEL BURIAL GROUNDS  
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Richland, Washington

July 22, 1993  
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Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

Mr. D. Duncan (EPA) and Mr. B. Cordts (Ecology) agreed that the meeting minutes for the June 14, 1993 meeting were satisfactory. Mr. R. Bowman (WHC) signed the meeting minutes (7-22-93). Mr. Duncan and Mr. Cordts authorized Mr. Bowman to sign for them via the videoconference. After this meeting, the June 14, 1993 meeting minutes will be delivered to Ms. S. Price (WHC) for signature.

2. PROGRAM STATUS

• Status of Design and Construction Schedule

Mr. Bowman reported that he understood the design package was to be sent out for the construction bid on June 22, 1993. In addition, Mr. Bowman stated that Mr. E. Erpenbeck (WHC) and Mr. G. Evans (WHC) were in Los Alamos for a technical exchange regarding the burial grounds design, and therefore current information was limited.

3. PERMIT APPLICATION STATUS

Mr. Bowman stated his group was in the process of revising the burial grounds permit application, but wanted to be sure that the NODs submitted in April 1993 were acceptable to both Ecology and EPA. Mr. Bowman also indicated revisions were being made with the knowledge that there could be changes due to input from EPA and Ecology.

Mr. Cordts did not have an update regarding Ecology's response to the NODs, but stated that some of the burial grounds items are tied into the Hanford Facility permit. In response, Mr. Duncan asked Mr. Bowman if Ms. Price had spoken to him about the Hanford Facility Permit. Mr. Bowman acknowledged a brief discussion concerning the schedule of September 15, 1993. Mr. Duncan responded that the EPA would be setting up a meeting in early August 1993 to discuss facility-wide issues and that some of the burial grounds issues could be addressed at that time.

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#### 4. RCRA TOPICS

- Discussion of 4-9-93 NOD Response Table

Ms. B. Broomfield (WHC) asked if EPA would respond to the latest NODs sometime after the August 1993 meeting. Mr. Duncan replied that the August 1993 meeting would impact and possibly resolve some of the issues raised in the NODs for the LLBG.

#### 5. GENERAL TOPICS

- Action Items

The past action items (Attachment 4) were reviewed as follows:

- 10-26-92:1 OPEN. Ecology intends to send a letter early next week stating its agreement with the design. Mr. Cordts has one point of concern to discuss with Mr. M. Jaraysi (Ecology), but it should be resolved in time to send the letter out.
- 03-02-93:2 OPEN. WHC has suggested a letter for RL to submit to Ecology regarding revisions to Figure 11-8 "Schedule for Closure of LLBG" of the Low-Level Burial Grounds Dangerous Waste Permit Application. Ms. Broomfield indicated a discussion with an RL representative regarding the letter was to be held during this meeting; however, the RL representative was not present, and Mr. Bowman deferred further discussion until the next meeting.
- 03-02-93:3 OPEN. Mr. Bowman indicated there was no one from RL or Westinghouse prepared to discuss this item and deferred it to the next meeting.
- 03-02-93:5 OPEN. Ecology had the action to respond to the letter WHC sent requesting concurrence with putting K-3 filters in the ground. Mr. Cordts stated he needed assistance with this action. Mr. Duncan stated Mr. J. Witczak (Ecology) was following the item and would have the information on it.
- 06-14-93:1 OPEN. TSCA item to determine the appropriate methods to modify the compliance agreement on trench 94. Mr. Duncan stated that Mr. Evans was going to look into it, and Mr. Bowman deferred discussion on this item until the next meeting when Mr. Evans would be present.

- New Action Items

No new action items were discussed.

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- **Schedule Next Meeting Date**

The date for the next meeting was set for 2:00 pm to 2:30 pm on August 24, 1993. The meeting will be held in Richland and in Seattle by videoconference.

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Attachment 3

LOW LEVEL BURIAL GROUNDS  
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Richland, Washington

July 22, 1993  
2:30 p.m. - 3:00 p.m.

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Roger Bowman	WHC	(509) 376-4876
Barbara Broomfield	WHC	(509) 376-4966
Robert Cordts	Ecology	(206) 459-6863
Dan Duncan	EPA	(206) 553-6693
Kathy Knox	WHC	(509) 372-3596
Dean Powell	WHC	(509) 373-9240
Dean Pratt	WHC	(509) 373-2464

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Attachment 4

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July 22, 1993  
2:30 p.m. - 3:00 p.m.

Action Items

<u>Action Item</u>	<u>Description</u>
10-26-92:1	Provide letter indicating that Ecology agrees that the definitive design package for the mixed waste trench to be built in Burial Ground 218-W-5 (Project W-025) is complete and acceptable for construction. Action by Ecology is needed by September 1993 to have time to prepare bid package for scheduled construction in Spring of 1994.  OPEN
03-02-93:2	Prepare letter to Ecology by 4-23-93 that describes revisions to Figure 11-8 "Schedule for Closure of LLBG" that is in the permit application. ACTION: B. Broomfield/G. Evans (WHC)  OPEN
03-02-93:3	Send letter to RL indicating that the "Request for Exemption from Lined Trench Requirements and from Land Disposal Restrictions for Residual Liquid at 218-E-12B Burial Ground Trench 94" is approved. Action by Ecology as soon as possible so proposed demonstration project can begin.  OPEN
03-02-93:5	Send letter responding to RL's notification of intent to dispose of K-3 Filters in the LLBG. Action by Ecology.  OPEN
06-14-93:1	Determine the appropriate method to modify the "Compliance Agreement Between United States Department of Energy Richland Operations Office Richland Washington and the Environmental Protection Agency Region 10, Seattle, Washington" regarding Toxic Substance Control Act regulation of polychlorinated biphenyl disposal in trench 94 of burial ground 218-E-12B to approve the backfilling of the submarine reactor compartments prior to issuing the permit for the LLBG.

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Distribution:

B. A. Austin	WHC	B2-35
R. C. Bowman	WHC	H6-24
B. J. Broomfield	WHC	N3-13
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
R. E. Cordts	Ecology	
A. K. Crowell	RL	R3-81
D. L. Duncan	EPA	HW-106
D. Dunning	ODOE	
E. G. Erpenbeck	WHC	G6-47
G. C. Evans	WHC	H6-23
R. M. Gordon	RL	A6-55
R. F. Guercia	RL	A5-21
M. Jaraysi	Ecology	
G. H. Landeen	WHC	H6-23
P. J. Mackey	WHC	B3-15
M. M. McCarthy	WHC	N3-13
R. D. Pierce	WHC	N3-13
B. E. Poremba	WHC	T4-03
D. B. Powell	WHC	T4-03
D. A. Pratt	WHC	T4-03
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68

ADMINISTRATIVE RECORD: Low Level Burial Grounds, D-2-9  
[Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to Kathy Knox, WHC (H6-24),  
(509) 372-3596.



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