

START

0027245

Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 216-B-3 Pond System Closure Plan
740 Stevens Center Building, Room 2519
Richland, Washington

Meeting Held January 13, 1993

216-B-3 Pond System Closure Plan, Unit Managers' Approval

Robert G. McLeod Date: 3-10-93
Robert G. McLeod, RL, Unit Manager, ERD/ERB

Not Present

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

Elizabeth A. Wiley Date: 3-10-93
Elizabeth A. Wiley, Washington State Department of Ecology, Unit Manager

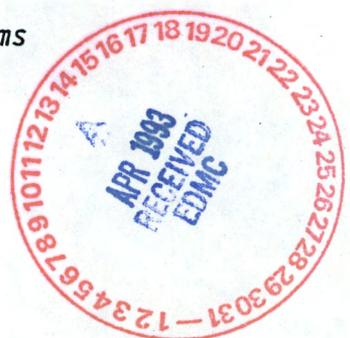
216-B-3 Pond System Closure Plan, WHC Concurrence

Fred A. Ruck III Date: 3/10/93
Fred A. Ruck III, WHC, Contractor Representative

Pauline D. Mix Date: 3/10/93
Pauline D. Mix, WHC, Contractor Representative

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

- Attachment #1 - Summary of Discussion
- Attachment #2 - Agenda
- Attachment #3 - Attendance List
- Attachment #4 - Action Items
- Attachment #5 - NOD Comments for the 216-B Pond System
- Attachment #6 - Tri-Party Agreement Milestone Affecting Liquid Effluent Discharges at 216-B-3 Pond System
- Attachment #7 - Summary of 200 Area Phase I and II Effluent Streams
- Attachment #8 - B-Pond RCRA/CERCLA Integration Schedule



931013033

Attachment #1

Summary of Discussion

216-B-3 Pond System Closure Plan
Meeting Held January 13, 1993

Summary of Discussion

Review, Amend, Approve, and Distribute Prior Meeting Minutes: The draft December 15, 1993 Unit Manager Meeting Minutes were provided to the Ecology Unit Manager (Wiley).

Status NOD Responses: The final Notice of Deficiency Table (NODs) were delivered by Ecology (Wiley) to RL/WHC (Attachment #5). Ecology will send a letter to RL/WHC confirming delivery of the NOD comments. Ecology (Wiley) stated that all previous NOD comments not incorporated into this final NOD Table are resolved by Ecology.

Action Item:

Ecology will send a letter to RL confirming transmittal of their final Notice of Deficiency comments.

Status Phase II Sampling Data: WHC has given the Phase II sampling data a preliminary review and presented a summary of the Phase II data results that have been received. WHC is awaiting the results of analyses for radioactive constituents and the analyses of samples sent to the split laboratory.

The WHC Phase II sampling results indicate no volatile organic compounds (VOCs), Semi-VOCs, or Pesticides/PCBs to be present above detection limits. In addition, the WHC Phase II sampling results indicate that metals/inorganics were not found at levels above site-wide background limits. The WHC Phase II sampling data agrees with Ecology's results from their split samples which have been fully validated. RL (McLeod) requested a copy of Ecology's results Phase II sampling results and Ecology (Wiley) agreed to this request.

Discussion of RL/WHC Action Item 12-15-92:1: Janice Williams (WHC) gave a presentation on discharges of liquid effluents planned to continue to portions of the 216-B-3 Pond System (Attachments #6, #7). The discussion included a brief description by WHC of the M-17 milestone requirement for securing a WAC 216 Permit and abiding by the WAC 240 requirements for effluent treatment prior to discharge to the ground via the application of best available technology. RL (McLeod) stated that it is not specifically the responsibility of DOE-RL (ERD) or Ecology RCRA Closure Group to worry about discharge requirements since this is the responsibility of other groups within DOE-RL and Ecology. It is the responsibility of the closure groups to clean close the 216-B-3 Pond lobes. Ecology was satisfied with the presentation and the action item was closed.

Discussion of Ecology Action Item 12-15-92:2: According to E.A. Wiley (Ecology), Toby Michelena (Ecology) has opened communication with his Ecology counterparts in the RCRA Past-Practice group concerning the integrated RCRA/CERCLA activities for the 216-B-3 Pond System. Integration of the 200-BP-11
(continued)

**216-B-3 Pond System Closure Plan
Meeting Held January 13, 1993**

Summary of Discussion (continued)

Operable Unit and the closure of the 216-B-3 Pond system is desired by both the RCRA and RCRA Past-Practice groups within Ecology per Wiley (Ecology). The mechanism by which this to occur within Ecology has not been determined. The action item remains open.

Discussion of RL/WHC Action Item 12-15-92:3: The B-Pond RCRA/CERCLA Draft Integrated Schedule titled *B-Pond RCRA/CERCLA Integration Schedule* (Attachment #8) was handed out by RL/WHC. RL (McLeod) discussed the schedule and the need for closure of B-Pond B and C lobes by the June 1995 milestone date. RL (McLeod) stated that the B-Pond closure plan must be ready for public review prior to clean closure of Lobes B and C in June 1995. RL (McLeod) requested that E.A. Wiley (Ecology) submit the schedule to her supervisors (Michelena and Jansen) at Ecology for their review and comment.

RL (McLeod) stated that work on integration of the 200-BP-11 Operable Unit (OU) with the B-Pond RCRA closure must start in 1993 for the schedule to be met. McLeod stated that the next six OUs will have to be chosen for FY93. The decision that the 200-BP-11 OU would be one of the next six needs to be made quickly by the Hanford Project Managers in order for the draft schedule and integration to be feasible. The work would be on the entire OU, not just the Ponds but ditches also. Closure of the various units in 200 areas will require liquid effluent discharges and certain discharges (e.g., secondary cooling water) can not conceivably be stopped.

New Business: There were no new items of business. The next Unit Manager Meeting was scheduled February 10, 1993.

9 2 0 0 1 0 0 6 1 1 5 6

Attachment #2

Agenda

**216-B-3 Pond System Closure Plan
Unit Managers Meeting**

Meeting Held January 13, 1993

- Review, Amend, Approve, and Distribute Prior Meeting Minutes
- Status NOD Responses
- Status Phase II Sampling Data
- New Business

9 3 1 3 0 2 1 9 3 6

ATTACHMENT #5

NOD Comments for the 216-B Pond System

Comment No.

- 1 DOE/WHC Response: As agreed to at the June 25, 1992 UMM, DOE/RL shall perform a Phase II sampling activity. In this Phase 2 sampling effort, RL shall take 3 samples from each of the expansion ponds (lobes A, B, and C) with Ecology taking splits. DOE-RL will send the samples to their contracted laboratory using SW-846 protocols with data reported in summary sheets as required. Ecology will procure their own lab for their sample analysis. The Phase II sampling purpose is to demonstrate clean closure with the inclusion of Phase I sample analysis results.

The Ecology 6/18/92 response discusses validation of data and further sampling. The original intent of the 12/2/92 comment/requirement concerns the deferral of main pond closure activities to the 200-BP-11 Operable Unit. This is a RCRA/CERCLA issue and should be resolved during the upcoming RCRA/CERCLA discussions with EPA and Ecology.

Ecology Requirement: Ecology requires that a complete closure plan be submitted for all areas associated with B-Pond so that these areas, all lobes A, B, & C, may be closed simultaneously.

- 3 DOE/WHC Response: Through Phase II sampling RL/WHC is currently attempting to show that lobes B and C can be clean closed. RL/WHC evaluations show that the mounding of the groundwater due to the discharge of water to lobes B and C should not have any effect on the portions of the 216-B-3 Pond System which will have undergone interim stabilization. The mound is presently located 125 feet below groundlevel. The data from the RCRA Groundwater Monitoring Wells Project indicate that this mounding will move Eastward when discharges cease to the areas that will have undergone interim stabilization.

Ecology Requirement: Ecology's stance remains the same, disallowing the discharge of wastewater into A lobe. If Phase II sampling proves that lobes B & C cannot be clean closed, discharges will be disallowed into these areas.

- 4 DOE/WHC Response: The most probable location of any soil that could be contaminated would have come from lobe B since this lobe was deepened within the last ten years and after the dike failure. This soil is now in the dikes of the main lobe. This main lobe will undergo interim stabilization. Interim stabilization consists of pushing the dikes into the main lobe and then backfilling with clean soil from borrow pits. Therefore, additional sampling is not needed.

Ecology Requirement: Interim Stabilization will not be allowed for this site.

- 5 **DOE/WHC Response:** A report was submitted indicating exposure pathways and contamination from Aluminum, Arsenic, Copper, Lead, Magnesium, and Sodium. The conclusion of this report was that the ingestion was not the major pathway of concern. The surface water at 216-B-3 Pond system does not designate as a hazardous waste. There are no constituents that exhibit chronic or acute toxicity. The list of analytes at Silver Mountain are higher, some being an order of magnitude greater, than those found at the 216-B-3-pond system. The Silver Mountain report did not suggest that there was an imminent threat to the environment or to livestock. The 216-B-3 Pond system does not have the elevated levels that are found at the Silver Mountain Mine.

Ecology Requirement: No mention has been made as to the effects of radiological contamination. These effects must be taken into consideration regarding human health and the environment. Ecology does regulate the sediments in the pond per 70.105.109 RCW regarding radionuclides in mixed waste. Closure requirements stated in the TPA must be followed. Ecology's position remains the same.

TRI-PARTY AGREEMENT MILESTONES AFFECTING LIQUID EFFLUENT DISCHARGES AT 216-B-3 POND SYSTEM

- M-17-00A, June 1995
 - Complete treatment facilities/upgrades for Phase I Effluent Streams. To be implemented by Projects W-049H and W-291.
Eliminates: PUREX Chemical Sewer (includes steam condensate and cooling water) (M-17-22, 23, 24)
B-Plant Chemical Sewer (M-17-04)

- M-17-10, June 1995
 - Cease liquid discharges to hazardous waste land disposal units unless such units have been clean closed in accordance with RCRA.

- M-17-00B, October 1997
 - Implement BAT/AKART for all Phase II Streams by October 1997, Project W-252.

ECOLOGY CONSENT ORDER MILESTONES AFFECTING LIQUID EFFLUENT DISCHARGES AT 216-B-3 POND SYSTEM

- **Section 5, Table 3, December 1993**

Submit State Waste Discharge Permit Applications for the Phase II Streams (B-Pond discharges)

- **241-A Tank Farm Cooling Water**
- **284-E Powerplant Wastewater**
- **244-AR Vault Cooling Water (eliminated)**
- **B Plant Cooling Water**
- **242-A Evaporator Cooling Water**
- **242-A Evaporator Steam Condensate**

- **Section 8, Table 6, June 1995**

Cease effluent discharge to the 216-B-3 Pond System

- **PUREX Plant Steam Condensate**
- **PUREX Plant Cooling Water**
- **PUREX Plant Chemical Sewer**
- **B-Plant Chemical Sewer**

ECOLOGY CONSENT ORDER MILESTONES AFFECTING LIQUID EFFLUENT DISCHARGES AT 216-B-3 POND SYSTEM

- **Section 5, October 1997**

Implementation of BAT/AKART for the Phase II Streams (B-Pond discharges)

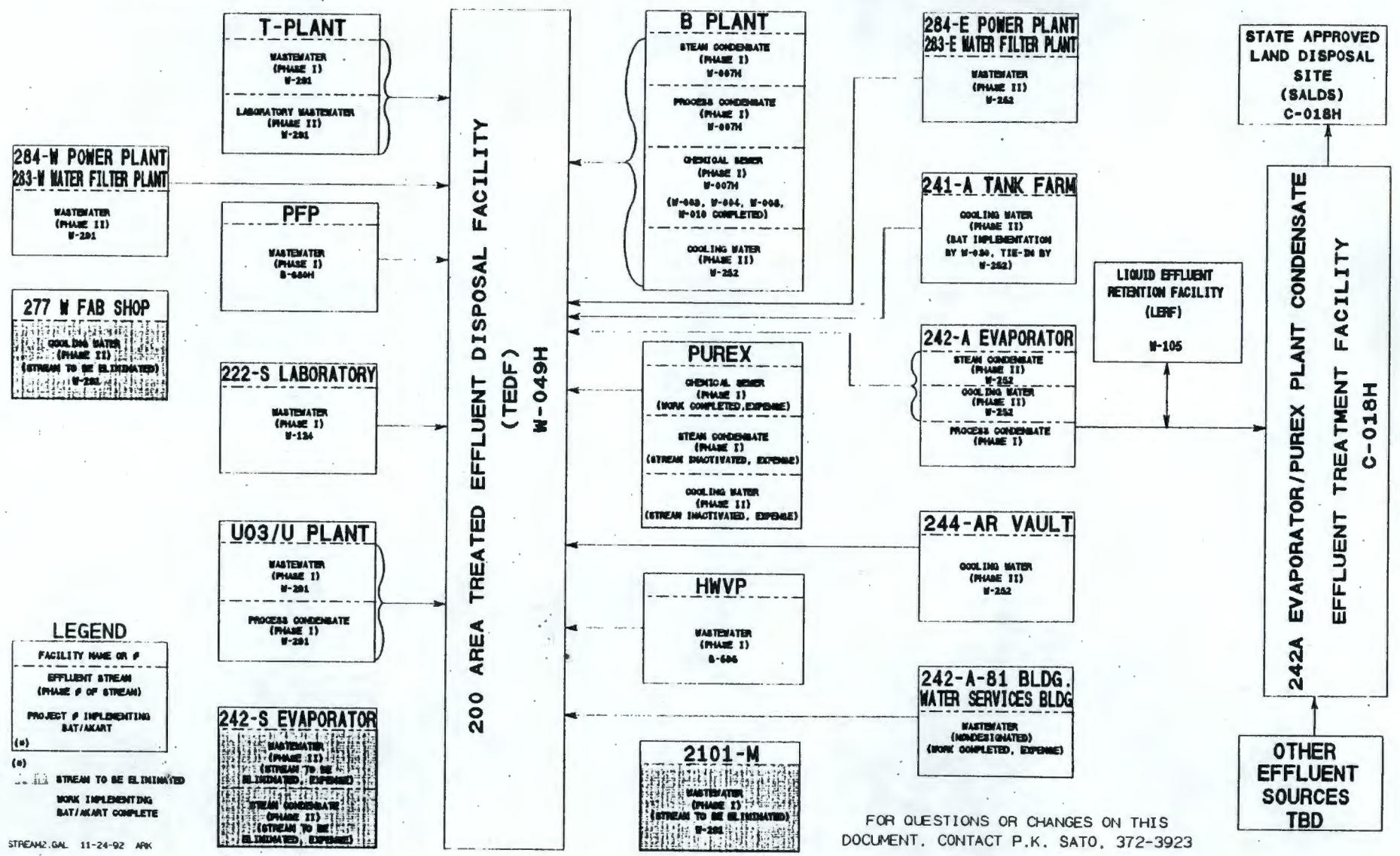
- **241-A Tank Farm Cooling Water**
- **284-E Powerplant Wastewater**
- **244-AR Vault Cooling Water (eliminated)**
- **B Plant Cooling Water**
- **242-A Evaporator Cooling Water**
- **242-A Evaporator Steam Condensate**

ATTACHMENT #7

SUMMARY OF 200 AREA PHASE I AND II EFFLUENT STREAMS
(11/92)

200 WEST AREA STREAMS

200 EAST AREA STREAMS



LEGEND

FACILITY NAME OR #

EFFLUENT STREAM (PHASE # OF STREAM)

PROJECT # IMPLEMENTING BAT/AKART

(#)

STREAM TO BE ELIMINATED

WORK IMPLEMENTING BAT/AKART COMPLETE

FOR QUESTIONS OR CHANGES ON THIS DOCUMENT, CONTACT P.K. SATO, 372-3923

Distribution:

W.H. Bodily KEH (E3-33)
E.A. Bracken RL (A5-19)
R.M. Carosino RL (A4-52)
C.E. Clark RL (A5-15)
W.G. Cox WHC (H6-23)
D.L. Duncan EPA (HW-106)
B.G. Erlandson WHC (H6-21)
G.D. Forehand WHC (B2-35)
C.J. Geier WHC (H6-21)
R.D. Freeberg RL (A5-19)
G.W. Jackson WHC (H6-20)
R.L. Jackson WHC (H4-56)
R.N. Krekel RL (A5-15)
R.J. Landon WHC (H6-22)
J.R. Laws WHC (H6-23)
P.J. Mackey WHC (B3-15)
R.G. McLeod RL (A5-19)
M.A. Mihalic WHC (L4-77)
P.D. Mix WHC (H6-27)
S.M. Price WHC (H6-23)
A.L. Prignano WHC (H6-23)
F.A. Ruck III WHC (H6-23)
H.T. Tilden PNL (P7-68)
M.A. Wasemiller WHC (H6-03)
E.A. Wiley Ecology
B. Woods EPA (ES-095)

GSSC RCRA UMM File, Care of S. Lijek, A4-35

ADMINISTRATIVE RECORD (216-B-3 Pond) [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Library,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, HW-106

Please send comments on distribution list to Steve Lijek (A4-35), 376-0309.