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December 6, 1990  
Final

## Meeting Minutes Transmittal/Approval

303-K Mixed Waste Storage Facility and 304 Concretion Facility  
Unit Manager's Meeting  
Department of Ecology Meeting Room  
Lacey, Washington

Meeting Held November 29, 1990

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

Clifford E. Clark Date: 1/10/91  
Clifford E. Clark, DOE-RL, ERD

Not Present Date: \_\_\_\_\_  
Dan Duncan, EPA Region X

Dave Watson Date: 1/10/91  
Dave Watson, WHC Contractor Representative

Megan Leychen Date: 1/10/91  
Megan Leychen, Ecology Unit Manager

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



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Attachment #1

Meeting Summary and Summary of Discussions and Commitments  
303-K Mixed Waste Storage Facility and 304 Concretion Facility  
Unit Manager's Meeting  
November 29, 1990

Revised Closure Plans are to be submitted by January 8, 1991. DOE (Cliff Clark) would like to submit the Notice of Deficiency table and then do the revision.

WHC (David Watson) stated that there were three kinds of Notice of Deficiency responses: 1) Old comments on old closure plans pending new information, 2) Unapproved comments, 3) Comments for which Ecology wants to be provided a draft of the text revision.

DOE (Cliff Clark) suggested, rather than having many formal submittals, to have informal communication; telefaxing responses to Ecology for informal NOD responses. Ecology needs more information on the unapproved comments. Ecology (Megan Lerchen) will try to give guidance on what is acceptable.

Ecology (Megan Lerchen) <sup>will require Mr</sup> ~~would prefer~~ for closing RCRA operable units that any man-made structures on contaminated soils be clean-closed or removed. For the soils it is necessary to clean up below the background levels in the area defined in the Model Toxics Control Act (MTCA). In 304 Concretion the building can be cleaned up or demolished and shipped to a landfill site, the latter action appearing more appropriate to Ecology. Soils would then be tested. Post Closure Requirements for a unit that is not being clean closed have a degree of flexibility, and the pursuit of clean closure in some cases is not warranted, particularly if there will be a CERCLA closure later.

*as generic issues are resolved (by Ecology) ML*

Ecology does not consider a one-foot depth sampling of the vadose zone at 303-K to be adequate. Any metals from 303-K would absorb in the soil; hydrocarbon contamination would be close to but not at the surface, nor in the top one foot. A 12-foot sampling depth in 2101-M Closure Plan was determined on the basis of sampling equipment and the nature of the contaminants to be sampled.

Mr. Watson asked for Ecology guidance on the Post Closure Plans for 303-K and 304 Concretion.

#56 This comment is asking for information on the cover materials to be used rather than details about the complete design.

#35 (304) This comment is generally intended to state that unless there is gross contamination it should be left for CERCLA cleanup. Any contaminants from other TSD units which have migrated onto this unit will most likely be taken care of with the area background sampling.

#51 (303-K) Mr. Watson stated that that the 90-day time clock for disposal of hazardous waste begins when it is generated and it is known that it is a hazardous waste. Logistically it is impossible to handle

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an unknown drum of waste within 90 days because of the sampling, analysis, and designation requirements. Mr. Clark stated that the 90-day time period is triggered when the generator determines it is a regulated waste, and the burden of determining that a waste is a designated waste is on the generator. A waste will not be declared dangerous until there is hard evidence, and the sampling and analysis are available. If concrete rubble is placed in drums, it will be considered clean rubble until determined otherwise. Ecology (Megan Lerchen) stated that if such rubble is contaminated it will be past the 90 days. DOE (Cliff Clark) is in disagreement with this. There is disagreement as to whether Dangerous Waste Regulations or RCRA regulations apply in such clean up efforts.

#38 (304) Ecology asked that a more comprehensive table of analytical results should be reported along with the target analytes, and not that the number of analytes needs to be increased.

Ms. Lerchen indicated that the Postclosure Plan as a chapter or appendix within the Closure Plan would be sufficient.

The next meeting will be held at 11:00 a.m., January 3, 1991 in Richland, Washington.

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Attachment #2

Commitments/Agreements Status List  
303-K Mixed Waste Storage Facility and 304 Concretion Facility  
Unit Manager's Meeting  
November 29, 1990

ACTION ITEM

COMMITMENTS/AGREEMENTS STATUS LIST

9-19-90:1

The NOD responses to Ecology comments will be sent to Ecology. Action: DOE/WHC.

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**Attachment #3**

**Agenda**

**303-K Mixed Waste Storage Facility and 304 Concretion Facility  
303-K MIXED WASTE STORAGE FACILITY 304 CONCRETION FACILITY**

November 29, 1990

1. Extension of the Closure Plan's Revision Date
2. Requirements for Deferring Final Soil Cleanup to CERCLA (Postclosure Plan)
3. General Discussion of Notice of Deficiency Comments

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Attachment #4

Attendance List  
303-K Mixed Waste Storage Facility and 304 Concretion Facility  
Unit Manager's Meeting  
November 29, 1990

| <u>Name</u>   | <u>Organization</u> | <u>Phone</u> ____ |
|---------------|---------------------|-------------------|
| Dave Banning  | WHC                 | 509-376-1057      |
| John Burger   | SWEC                | 509-376-4726      |
| Cliff Clark   | DOE/ERD             | 509-376-9333      |
| Joe King      | SWEC                | 509-376-9707      |
| Megan Lerchen | Ecology             | 206-438-3089      |
| Dave Watson   | WHC                 | 509-373-3250      |

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Distribution:

J.D. Bauer WHC (B3-15)  
D.L. Banning WHC (H4-57)  
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)  
C.A. Collins SWEC (A4-35)  
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)  
J.D. King SWEC (A4-35)  
R.J. Landon WHC (B2-19)  
M.E. Lerchen Ecology  
L.L. Powers WHC (B2-35)  
F.A. Ruck III WHC (H4-57)  
T.B. Veneziano WHC (B2-35)  
D.J. Watson WHC (X0-41)  
E.A. Weakley WHC (L6-28)

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

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