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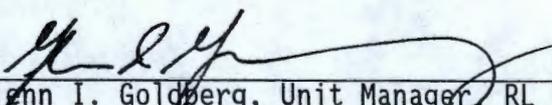
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Meeting Minutes Transmittal - Approval

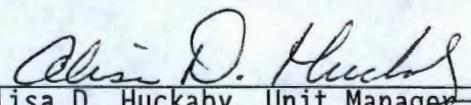
Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 1600
Richland, Washington

Meeting Held April 14, 1994
12:30 PM - 2:00 PM

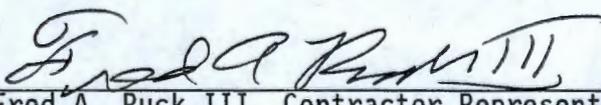
The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.


Glenn I. Goldberg, Unit Manager, RL Date: 5/27/94

Not Present
Daniel L. Duncan, RCRA Program Manager, EPA Region 10 Date: _____


Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology Date: 5/27/94

100-D Ponds, WHC Concurrence


Fred A. Ruck III, Contractor Representative, WHC Date: 5/27/94

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:
Attachment 1 - Meeting Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Action Items



9113224.2129

Attachment 1

Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 1600
Richland, Washington

Meeting Held April 14, 1994
12:30 PM - 2:00 PM

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
3. Status Closure Activities
 - 100-D Ponds Closure Plan, Rev. 0, NOD
 - . Status of Ecology Review of NOD Response Table
 - . Discuss NOD Responses/Issues
 - "Modified" closure
 - Phase II sampling/DQO process
 - Groundwater monitoring
 - Discontinuation of Discharges to the 100-D Ponds
4. New Business
 - None
5. Set Next Meeting Date

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Attachment 2

Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 1600
Richland, Washington

Meeting Held April 14, 1994
12:30 PM - 2:00 PM

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The March UMM minutes were signed by the RL and Ecology Unit Managers.

2. Status of Action Items

- NONE

3. Status Closure Activities

- 100-D Ponds Closure Plan, Rev. 0, NOD

Status of Ecology Review of NOD Response Table. Ecology (Ms. A. D. Huckaby) indicated that she would be unable to respond to NOD comments by the April 19, 1994 due date to RL. She anticipated that completing her evaluation of the NOD responses and the time required for peer review of her responses by the Elizabeth McMannus (Ecology Lacey) would delay the response table by approximately 2 months.

Discuss NOD Responses/Issues.

WHC (Mr. S. N. Luke) began the discussion by identifying 3 major issues of concern to Ecology as discussed at the March UMM: Phase II sampling, "modified" closure and groundwater monitoring.

- Regarding "Modified" Closure. WHC (Mr. S. N. Luke) indicated that at the March UMM, Ecology (Ms. Huckaby) had voiced an interest in hearing the conditions for "modified" closure explained by the manager of WHC RCRA Closures, Mr. Fred Ruck, who was present at the meeting.

WHC (Mr. F. A. Ruck) indicated that the Hanford RCRA Facility Permit has created an interim closure mode for TSD units having contamination at levels between the residential and industrial health-based standards of MTCA. This interim mode is called "modified" closure and is appropriate where the TSD unit does not provide a threat to human health or the environment or where future use of the property (i.e., as an industrial site precluding public access) allows for controlling exposure risk. It is also far less expensive than possibly unneeded soil removal or a landfill cover. "Modified" closure entails a 5 year period of unit-specific 'compliance' monitoring [using the Permit language] with a unit assessment activity at the end. For land disposal units, the monitoring

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would likely be a continuation of current groundwater monitoring programs. For storage units, the assessment activity could be as simple as routine visual inspections of the premises on a quarterly or annual basis. For land disposal units, the assessment activity could entail some limited sampling.

'Compliance' monitoring should be planned out and incorporated into the closure plan and should not require a postclosure permit application. The "modified" closure period is a temporary extension of the TSD unit closure process until remediation methodology or a final closure decision become clearer through time or through the development of a comprehensive remedial approach for the entire operable unit [100-DR-1]. If a unit-wide plan becomes available during the 5 years, the closure plan would be revised to incorporate it. Keeping "modified" closure in the closure plan would also reduce the volume of documents and keep this temporary strategy in the closure plan with the supporting sampling data. Mr. Ruck felt that a postclosure permit application is more appropriate to landfill cover installation where comprehensive design information must be separately presented for approval.

Ecology (Ms. A. D. Huckaby) requested that due to a pre-existing regulatory definition for the term 'compliance monitoring', this term be qualified as MTCA compliance monitoring where used for "modified" closure. WHC (Mr. Ruck) indicated that he recognized the conflict in terminology and agreed to qualify its use as suggested by Ecology.

- **Regarding Phase II Sampling.** WHC (Mr. Ruck) indicated that he would envision proceeding with a DQO for Phase II sampling, performing the sampling, evaluating the data, determining the applicability of "modified" closure to the unit, and then if "modified" closure was applicable, establishing the monitoring requirements for the unit.

WHC (Mr. S. N. Luke) indicated that FY '94 budget was already allocated for Phase II sampling and would also be used to fund the DQO process. Ecology (Ms. A. D. Huckaby) indicated that she would object to starting a DQO process for acceptance of Phase I sampling data because sampling shortcomings would make reaching an agreement unachievable. However, she would make herself available for a Phase II DQO process but wanted to ensure that Phil Staats [100-DR-1 OU Ecology Unit Manager] would also be available. Ecology (Ms. A. D. Huckaby) also asked if WHC would enter the process with a sampling proposal as a starting point. WHC (Mr. F. A. Ruck) indicated that WHC would begin the process with a sampling plan.

- **Regarding Groundwater Monitoring.** WHC (Mr. S. N. Luke) introduced the third item of Ecology concern discussed at the prior UMM as groundwater monitoring. In response to Ecology's request, support personnel from WHC Geosciences was present at the meeting.

Ecology (Ms. A. D. Huckaby) indicated that she wanted to consider all of the options, including but not limited to a new well, in her pursuit of getting the unit's groundwater monitoring network back into compliance. She asked if well D8-5 data could be used in a statistical comparison program with sampling data from other wells in the groundwater

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monitoring network. WHC Geosciences (Ms. Mary Hartman) indicated that she would talk to her manager to get his input regarding this use of well D8-5 data. Ecology (Ms. A. D. Huckaby) asked if future well D8-5 data usage was allowed, could prior sampling data also be used to identify contaminant migration history or trends. WHC (Hartman) indicated that in her investigation of using the well she would be looking at the possibility of applying prior data in a statistical comparison program.

Ecology (Ms. A. D. Huckaby) indicated that if the unit closed under the "modified" closure option, she would likely be requesting increased or additional groundwater monitoring due to the waste not being stabilized with a cap. However, the current program list of sampling parameters may be sufficient with only an increase in frequency as opposed to an increase in scope.

- Discontinuation of Discharges to the 100-D Ponds

Although on the agenda, the meeting was adjourned without discussing this issue.

4. **New Business - None.**
5. **Set Next Meeting Date**

The next Unit Managers Meeting was scheduled for May 17, 1994 in Richland.

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Attachment 4

Unit Managers Meeting
100-D Ponds
2440 Stevens Center Building, Room 1600
Richland, Washington

Meeting Held April 14, 1994
12:30 PM - 2:00 PM

Attendance List

Action Items

Action Item #

Description

NONE

9113224.2135

Distribution:

J. K. Bartz	GSSC	B1-42
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	HW-106 (Seattle)
G. I. Goldberg	RL	A5-19
D. H. Herman	WHC	S2-12
R. N. Krekel	RL	A5-15
S. N. Luke	WHC	H6-23
P. J. Mackey	WHC	B3-15
R. G. McLeod	RL	A5-19
P. D. Mix	WHC	H6-29
S. M. Price	WHC	H6-23
A. D. Huckaby	Ecology	B5-18
F. A. Ruck III	WHC	H6-23
J. L. Waite	WHC	B2-35
J. J. Wallace	Ecology	B5-18
P. R. Staats	Ecology	B5-18
GHL/RCRA File	WHC	H6-23
Field File Custodian		H6-08

ADMINISTRATIVE RECORD: 100-D Ponds, D-1-1 [Care of EPIC, WHC (H6-08)]

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

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail
Stop HW-074 (Record Center)

Please send comments on distribution list to Kari Schmidli (H6-23), (509)373-
2083

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