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0013295

December 10, 1990
Final

Meeting Minutes Transmittal/Approval
300 Area Solvent Evaporator Closure Plan
Unit Managers Meeting
Federal Building, Room 176
Richland, Washington

Meeting Held November 28, 1990

Appvl. _____ Date: 1/25/91
Clifford E. Clark, Environmental Policy and Permitting, DOE-RL

Appvl. Not Present Date: _____
Daniel L. Duncan, EPA Region X Unit Manager

Appvl. _____ Date: 2/27/91
David J. Watson, Contractor Representative, WHC

Appvl. _____ Date: 1/25/91
Joe Witczak, Unit Manager, Washington State Department of Ecology

PURPOSE: Discuss permitting process.

Meeting Minutes are attached. Minutes are comprised of the following:
Attachment #1 - Summary of Meeting Discussion and Commitments
Attachment #2 - Agenda
Attachment #3 - Attendance List
Attachment #4 - Commitments/Agreements Status
Attachment #5 - NOD Comments for the 300 Area Solvent Evaporator Closure Plan

Attachment #1

300 Area Solvent Evaporator Closure Plan
Federal Building, Room 176
Richland, Washington
November 28, 1990

Summary of Discussion

1. WHC (Fred Ruck) stated that Ecology's Notice of Deficiency (NOD) comments had been received on November 19, 1990. WHC also stated that sampling for 300 ASE would occur in the late spring or summer. Delays in the schedule are based on laboratory delays. Closure plans are contingent on laboratory availability. Responses are due by December 21, 1990. Comments 4 and 6, which relate to cleanup standards, will require more discussion, and WHC may not be able to respond to them by December 21. DOE (Cliff Clark) stated that a letter must be written for formal documentation requesting an extension.

   ACTION ITEM: A letter will be sent to Ecology formally requesting an extension of the NOD response deadline from 12-21-90. Action: Cliff Clark.

2. DOE (Cliff Clark) stated that sampling and analysis results may ~~not~~ show chemical contaminants which are not a derivative of the 300 ASE. Should the concrete on which the 300 ASE was located is found to be contaminated with 300 ASE waste, it will be removed. The soils, however, will be left in place. Ecology (Joe Witczak) stated that 300 ASE will be handled differently than some other RCRA units. ~~There is greater confidence of what went into 300 ASE, therefore it is easier to differentiate between molecules of contamination and their source and to draw a boundary around the unit.~~

3. Ecology (Joe Witczak) stated that Ecology has no option other than a variance petition from background cleanup levels for listed wastes. WHC (Fred Ruck) feels that there is flexibility through integration of RCRA and CERCLA and that there may be flexibility at the project managers decision level; however, DOE (Cliff Clark) does not necessarily agree with the entirety of that statement.

4. DOE (Suzanne Clark) inquired as to what discussions had taken place at the Department of Ecology regarding standards for determining what constitutes background, and stated that it seems there needs to be a strategy; what is the representation of background, how is it defined, and what is Ecology's path toward defining background. Ecology (Joe Witczak) stated that EPA (CERCLA) uses the health-based standards, but that a reasonable option may be a regulation change wherein the Parties are not strictly bound to background, but the option to use background would remain.

Discussion of NOD Response Table

NOD #6 Mr. Witczak stated that the general direction of all regulations is to health-based standards, but this is not an option on #6. There are two issues: What is the difference between RCLA background and CERCLA health-based standards, and what will be used for background. Ecology is not asking to identify the background for inorganics but rather for an assessment of the results of contamination, taking sample results and doing qualitative analysis. Ecology will evaluate the numbers in the background and wants the numbers to support all of the theories.

NOD #32 WHC (Dave Watson) stated that uranium was a constituent in materials dumped in the 300 Area Solvent Evaporator. Mr. Witczak stated that the text should be amended to say "a sole indicator" and WHC should support why uranium is not being used.

NOD #23 Mr. Watson stated there is very little confidence in any estimates WHC has at this time for closure, with the exception of estimates for sampling costs. Mr. Witczak suggested getting a commitment in the Closure plan that closure cost estimates will be provided at a future date and approve the Closure Plan based on that commitment.

5. Ecology talked about the issues at 300 ASE and how to determine the source of solvents near the evaporator. He stated that sampling was called out to a depth of three inches in the soil.

ACTION ITEM: WHC will prepare draft responses to NODs by January 10, 1991. Action: Fred Ruck.

ACTION ITEM: WHC will prepare final responses to NODs by February 1, 1991. Action: Fred Ruck.

6. Mr. Ruck stated that there are concerns per SW-846 on how to handle concrete samples in preparation for analyses. Mr. Witczak stated that MTCA gives numbers for water and soil, but not for concrete. Ecology can accept soil numbers for concrete or steel.

ACTION ITEM: A Sampling and Analysis Plan Procedure will provide information for the pulverizing of concrete for laboratory analysis. Action: Fred Ruck.

7. ~~DOE (Suzanne Clark) expressed concerns about the extensive RCRA cleanup costs. DOE was surprised at the large value, approximately $1 million, for the cleanup of 300 ASE.~~

The next meeting is scheduled for January 17, 1991 in Richland, Washington.

Attachment #2

300 Area Solvent Evaporator Closure Plan
Federal Building, Room G-53
Richland, Washington
November 28, 1990

Agenda

- Discussion of Notice of Deficiency Responses.

Attachment #3

300 Area Solvent Evaporator Closure Plan
Federal Building, Room G-53
Richland, Washington
November 28, 1990

Attendance List

Name	Organization	Phone
Cliff Clark	DOE/ERD	509-376-9333
Suzanne S. Clark	DOE	509-376-9055
Sam Clifford	WHC	509-376-5137
Joe King	SWEC	509-376-4726
Fred Ruck III	WHC	509-376-9876
Brian Stahl	SWEC	509-376-0190
Joe Witczak	Ecology	206-438-7557
Dave Watson	WHC	509-373-3250
Ev Weakley	WHC	509-376-6122

Attachment #4

November 28, 1990

Commitments/Agreements Status

300 Area Solvent Evaporator Closure Plan

Action Items	Commitments/Agreement Status List
11-28-90:1	A letter will be sent to Ecology formally requesting an extension of the NOD response deadline from 12-21-90. Action: Cliff Clark. OPEN
11-28-90:2	WHC will prepare draft responses to NODs by January 10, 1991. Action: Fred Ruck. OPEN
11-28-90:3	WHC will prepare final responses to NODs by February 1, 1991. Action: Fred Ruck. OPEN
11-28-90:4	A Sampling and Analysis Plan Procedure will provide information for thepulverizing of concrete for laboratory analysis. Action: Fred Ruck. OPEN

ENCLOSURE

NOD Comments for the 300 Area Solvent Evaporator Closure Plan

No. Comment

4 Deficiency: Section 3.3, Decontamination and Removal of Hazardous Waste Residues, Page 3-7

Ecology's approval of clean closure for the 300 ASE is contingent upon the absence and/or removal of evaporator-originated waste. This requires that 300 ASE contamination be discerned from non-300 ASE contamination. Therefore, it is inappropriate, as suggested in the first paragraph of this page, to not assess the inorganic constituents in the concrete because "it is not possible to discriminate the [inorganic constituents] associated with the 300 ASE from those originating from other operations".

Requirement: The inorganic constituent concentrations must be assessed against the concentrations identified in the concrete sample taken from point 5. In addition, the absence or presence of 300 ASE solvents in the concrete should also be used to assess the origin of the inorganic waste constituents. All data resulting from this sampling effort should be viewed in its entirety to support the claim that the 300 ASE operations have not impacted the concrete pad. It should also be noted that a similar approach will be taken by Ecology when reviewing the soil analyses. If constituents are identified in the baseline soil samples which were also handled in the evaporator, all the sampling data will be reviewed to assess the origin of the baseline contamination.

6 Deficiency: Table 3-2, The 300 Area Solvent Evaporator Analytes and Performance Standards, Page 3-6

The halogenated hydrocarbon, polycyclic aromatic hydrocarbon and other organic constituent concentrations cannot be summed and assessed against a 100 ppm clean closure limit. This method is not consistent with the closure performance standards identified in the Dangerous Waste Regulations. WAC 173-303-610(2)

Requirement: Any waste constituents at the 300 ASE identified as listed waste (WAC 173-303-080) or characteristic waste (WAC 173-303-090) may not exceed background (baseline) for clean closure to be approved. All remaining waste constituents must be less than the applicable concentrations identified in the Model Toxics Control Act and dangerous waste designation criteria.

15 Comment: Section E-1.4, Action Levels and Baseline Threshold Concentrations, Page E-7

Comment 6 also applies here.

17 Comment: Table E-1, The 300 ASE Analytes and Performance Standards, Page E-5

Comment 6 also applies here.

21 Comment: Section 3.3, Decontamination and Removal of Hazardous Waste Residues, Page 3-7

The paragraph beginning with line 16 should be edited to include the fact that the concrete pad, in addition to the soils, will be used as a basis for determining clean closure. This should also be noted in Figure 3-1.

22 Deficiency: Section 3.3, Decontamination and Removal of Hazardous Waste Residues, Page 3-7

Ecology's Technical Information Memorandum No. 86-1 is "...used only for foundry slags, foundry baghouse dusts and waste sandblasting grits...". Furthermore, this memorandum "should not be used if it is determined that aquatically toxic constituents other than Cu, Ni, and Zn may be present in the waste (e.g., organotin paints, solvents, etc.)". Therefore, this memorandum is not applicable to the 300 ASE closure.

Requirement: Delete the reference to TIM No. 86-1 on line 31.

23 Deficiency: Section 5.2, Closure Cost Estimate, Page 5-2

The applicability of certain financial requirements at the Hanford site is in contention. Therefore, lines 3 and 4 may not be accurate.

Requirement: It has been agreed by the Hanford Project Managers that at least closure cost estimates would be provided to Ecology. The 300 ASE closure cost estimate may be provided to our office in the form of an annual letter between project managers. This same letter should then appear as an appendix to this document. Section 5.2 then need only state "Closure cost estimates can be found in Appendix __."

24 Comment: Section 5.3, Financial Assurance Mechanism, Page 5-2

Financial assurance will be addressed in the site-wide permit. Therefore, Section 5.3 should be deleted.

25 Deficiency: Section 5.4 and Section 5.5, Post-Closure Cost Estimate and Financial Assurance Mechanism for Post-Closure Care, Page 5-2

This document is limited to closure activities. Therefore, post-closure activities do not need to be addressed in this document.

Requirement: Delete Sections 5.4 and 5.5 from the text.

26 Comment: Section 5.6, Liability Requirements, Page I-69/70

Liability requirements will be addressed in the site-wide permit. Therefore, Section 5.6 should be deleted.

27 Comment: Section 6.5.1.3, Notification of Authorities, Page 6-4

Add "- Actions taken to mitigate the situation" at line 5.

28 Deficiency: Section 7-1, Contingency Plan, Page 7-1

The proximity of fire stations and medical service stations do not preclude the need for a RCRA or dangerous waste contingency plan.

Requirement: Delete the sentence beginning with "The proximity to.." on line 9. Replace this sentence with a brief discussion of a sampling team's guideline for applicable contingencies.

29 Comment: Section 9.8, Other Requirements, Page 9-2

Lines 48 and 49 reference the state's water quality standards. This standard, WAC 173-201, was revised in 1988 and is entitled Water Quality Standards for Surface Waters of the State of Washington. Please correct the cite here and in Chapter 10, References.

30 Deficiency: Appendix A, Part A Application, Page A-4

Page 3-3 of the closure plan indicates that the evaporator had a capacity of 800 gallons. Page 3-1 indicates the evaporator treated about 600 gallons per year. These figures do not correspond to the 220 gallon capacity and 220 gallons per day treatment capacity listed in the Part A Application.

Requirement: The discrepancies between the text and the application must be clarified.

31 Deficiency: Appendix C, Composition and Designation of Solvent Evaporator Waste, Page C-1

Table C-1 does not list vinyl chloride nor dichloroethylene. Furthermore, listed waste designations are not provided in this appendix.

Requirement: Explain the inconsistency between the constituents listed here and those listed in Table 3-2. Listed waste designations must be identified in this appendix.

32 Comment: Appendix E, Soil and Concrete Sampling and Analysis Plan, Figure E-1, Page E-5

Based upon unit manager discussions, uranium is not an indicator of 300 ASE contamination. Therefore, uranium should be deleted from this table as well as from Table 3-2.

33 Comment: Section E-2.1, Assessment Methods, Page E-12

Although the spill assessments are generally conservative, the assumption that the concrete pad is unfractured is not conservative. A brief discussion should be provided indicating the impacts and probabilities of this assumption.

34 Deficiency: Section E-2.4, Evaporator Overflow Spill Scenarios, Page E-14

Typo. Line 43. Replace "above" with "about".

35 Comment: Section E-3.3, Soil Baseline Sampling Locations, Page E-22

Typo. Line 13. Replace "trench boundary" with "closure area".

36 Deficiency: Section E-6.4.6, Chain of Custody Record, Page E-33

The fourth bullet at line 43 is not an acceptable form of security for chain of custody. A sample must meet one of the first three criteria for adequate quality control/quality assurance.

Requirement: Delete line 43.

Distribution:

J.D. Bauer	WHC	(B3-15)
L.A. Bracken	DOE	(A6-95)
L.C. Brown	WHC	(H4-51)
R.M. Carosino	DOE	(A4-52)
G.D. Carpenter	WHC	(H4-15)
C.E. Clark	DOE	(A6-95)
S.S. Clark	DOE	(A6-55)
S.B. Clifford	WHC	(H4-57)
W.T. Dixon	WHC	(B2-35)
G.T. Dukelow	WHC	(R2-97)
D.L. Duncan	EPA	(WW-W2)
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)
D.W. Lindsey	WHC	(R2-82)
H.E. McGuire	WHC	(B2-35)
R.D. Pierce	WHC	(R2-80)
L.L. Powers	WHC	(B2-35)
S.M. Price	WHC	(H4-57)
L.W. Roberts	WHC	(R2-80)
R.J. Roberts	WHC	(R2-97)
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)
S.A. Wiegman	WHC	(B2-19)
J. Witczak	Ecology	
D. Brendel	CEES	
R.G. Gant	WHC	(L6-18)

ADMINISTRATIVE RECORD (300 Area Solvent Evaporator) [Care of Susan Wray, WHC (H4-22C)]
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