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Meeting Minutes Transmittal

**Unit Managers' Meeting
183-H Solar Evaporation Basins
2440 Stevens Center, Conference Room 2200
Richland, Washington**

**Meeting Held December 15, 1994
From 1:30 to 5:00 p.m.**

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

Jeffrey M. Baugman DATE: 10 Aug 95
For Nancy A. Werder, Unit Manager, RL

Robert E. Cordts DATE: 26 Jan 95
Robert E. Cordts, Unit Manager, Washington State Department of Ecology

183-H Solar Evaporation Basins Closure, Contractor Concurrence:

[Signature] DATE: 26 JAN. 95
Contractor Representative, ERC

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



Attachment 1**Unit Manager's Meeting
183-H Solar Evaporation Basins
2440 Stevens Center, Conference Room 2200
Richland, Washington****Meeting Held December 15, 1994
From 1:30 to 5:00 p.m.****Agenda**

1. Approval of Past UMM Minutes

-The August and September minutes are presented for approval.

2. Status Action Items

- 08-18-94:1 Listed Waste Letter
- 09-20-94:2 Nitrate Cleanup Level
- 09-20-94:3 Hanford RCRA Permit Compliance Letter(s); conditions V.I.B.j and V.I.B.k
- 09-20-94:4 Review of Data Evaluation Report

3. Closure Activities / Planning

- Contractor Reorganization
 - Regulatory interface: Lacey / Kennewick
 - Closure Proposal, Action Item 03-02-93:1
 - i. Ecology has received incomplete draft
 - *present figures
 - ii. Outline
 - iii. Plan for completion
 - Vadose zone data validation
 - RCRA-CERCLA coordination
 - Status of modeling
 - Summary of open and resolved issues
- Attached

4. New Business

5. Set Next Meeting Date

Attachment 2

**Unit Manager's Meeting
183-H Solar Evaporation Basins
2440 Stevens Center, Conference Room 2200
Richland, Washington**

**Meeting Held December 15, 1994
From 1:30 to 5:00 p.m.**

Summary of Discussion and Commitments / Agreements

1. The August, September, and November UMM minutes were approved by the Unit Managers.
2. Status Action Items
 - 08-18-94:1 Listed Waste Letter - to be submitted by January 26, 1995
[R. Cordts agreed that Ecology and EPA should both receive this letter.]
 - 09-20-94:2 Nitrate Cleanup Level
[R. Cordts has not found a cleanup level based on direct soil exposure to humans. His Ecology contact in the Toxics Cleanup Group (Steve Robb) anticipates the usage of the 1000 ppm groundwater protection-based soil cleanup level. It was restated that ERC is looking for direct soil based level, not a groundwater-affect based level, because the current strategy tentatively assumes that groundwater will not be consumed by humans. The regulatory basis for this is that the "demonstration that the groundwater is protected," required by MTCA, will consist of simple statement that groundwater will not be used. Since groundwater protection is defined by its usage, groundwater-protection based levels would not be applied, unless the future land use decision negates this.]
 - 09-20-94:3 Hanford RCRA Permit Compliance Letter(s)
[Conditions V.1.B.j and k require submittal of data, data validation package, and narrative description of data. ERC has requested that these conditions be satisfied by submittal of the Data Evaluation Report for 183-H (WHC-SD-DD-TI-075). R. Cordts agreed, and expects that this report will be finalized as part of this requirement. He will hold his comments on the Data Evaluation Report until he has further reviewed the current closure proposal.]
 - 09-20-94:4 Review of Data Evaluation Report
[See previous item.]

3. Status Closure Activities / Planning

- Contractor Reorganization

[B. Mathis introduced Rex Miller and Joe Nickels as the new project and regulatory leads, respectively.]

- Regulatory Interface

[R. Cordts stated his belief that he is the lead for closure of this work unit and M. Jaraysi is the lead for the Hanford Facility RCRA Permit compliance. It is still uncertain whether Kennewick Ecology personnel should be active in closure developments.]

- Closure Proposal

[Ecology has received a draft. Figures for this incomplete draft were presented during this meeting. The closure proposal was discussed in detail at this meeting (see below). The unit managers agreed that the proposal will continue to be developed in parallel - ERC progressing with its preparation, and inputting comments from R. CORDTS as they become available.]

- Vadose Zone Validation

Status--this work is still being implemented and is nearing closure. No estimated completion date was given.]

- RCRA-CERCLA Coordination

[Status--RL (Nancy Werdel) expects that cleanup levels will be the same for CERCLA and RCRA, and that these would be available in June. R. Cordts asserted that it is his expectation that these levels will be based on the Model Toxics Control Act (MTCA) as required by WAC 173-303-610. N. Werdel pointed out that since MTCA is an ARAR for CERCLA activities, the final levels should be consistent with, or at least as low as, those produced by the MTCA method.]

- Status of modeling

[The phase I report has been delayed, but will be issued soon; it will probably recommend using the Summer's model or a similar model, rather than a more sophisticated model, based on an examination of available unit-specific information.]

- Summary of Open and Resolved Issues

[(attached to agenda) D. Butcher pointed out that he had moved the assumption that "groundwater in the 100 areas will not be used for direct human consumption." to the resolved section. The unit managers requested that it be put back in the "open issues" section.]

4. New Business

[R. Cordts said that his area code will be changed from '206' to '360' in January 1995.]

5. Set Next Meeting Date

[The next meeting is tentatively planned for January 26, 1995, 1:00 to 4:00 p.m., at 2440 Stevens Center, Conference Room 2519, Richland, Washington.]

Attachment 4

**Unit Manager's Meeting
183-H Solar Evaporation Basins
2440 Stevens Center, Conference Room 2200
Richland, Washington**

**Meeting Held December 15, 1994
From 1:30 to 5:00 p.m.**

Open Action Items

<u>Action Item #</u>	<u>Description</u>
03-02-93:1	<p>WHC will make a proposal for closure of the 183-H basins that will include a new closure date.</p> <p>As a result of contractor change, this action is conferred to ERC.</p>
09-20-94:2	Ecology will provide means to produce a direct soil exposure nitrate cleanup level, assuming that the value calculated from WAC 173-340-740(3)(a)(ii) is unacceptable.
09-20-94:3	<p>ERC will provide letter(s) addressing compliance with the Hanford Facility RCRA Permit conditions (V.1.B.g, V.1.B.j, and V.1.B.k).</p> <p>Status: The letter addressing condition V.1.B.k was received by Ecology. V.1.B.g and V.1.B.j will be addressed in the Data Evaluation Report.</p>
09-20-94:4	Ecology will review the 183-H Data Evaluation Report.
12-15-94:1	Ecology: Are the statistics of WAC 173-340-740(7)(d) applicable to MTCA cleanup levels?
12-15-94:2	Ecology: Since the MTCA method B arsenic cleanup level is less than background, can we use the Method A, which is based on state background?
12-15-94:3	Ecology: Comment on existing stage of closure proposal, with particular focus on our recommendations for cleanup levels / strategy for constituents without MTCA method B cleanup levels.

- 12-15-94:4 ERC: Have staff toxicologist review the nitrate cleanup level produced by WAC 173-340-740(3)(a)(iii) and propose direct soil cleanup level and rational.
- 12-15-94:5 ERC: Finalize Data Evaluation Report and submit final by March 28, in order to satisfy the Hanford RCRA Permit condition V.I.B.g and V.I.B.j.
- 12-15-94:6 ERC: Continue development of closure proposal.
- 12-15-94:7 ERC: Compare statistical guidance of Ecology, from Toxics Cleanup Program with our current MTCA-based method. See Open Action Item 12-15-94:1.
- 12-15-94:8 ERC: Make sure that our cleanup level / extent method is consistent with CERCLA.

Closed Action Items

<u>Action Item #</u>	<u>Description</u>
08-18-94:1	ERC will issue a letter requesting that the concrete be released from consideration as listed waste. Due September 1, 1994.
09-20-94:1	Ecology will evaluate debris rule compliance of 6 mm basin concrete removal with a fractional area of resistant aggregate protruding above the 6 mm level.
	This Action Item is CLOSED (November 1, 1994).

RESOLVED ISSUES

- An appropriate oral RFD for silver is 0.005 mg/(kg*day).
- The Debris Rule will be applied to 183-H basin concrete.
- It is appropriate to use the MTCA method A for cleanup level for lead.

OPEN ISSUES

- Action Items in Unit Managers Meeting minutes
- RCRA/CERCLA integration of soil closure activities
- Re-validation of vadose zone data
- Listed Waste Letter: Dangerous waste designation of concrete surface zone, and soil?
- Cleanup level for nitrate (pending, Ecology)
- Finalization/approval of closure proposal will address:
 - i. Selection of closure option (modified or clean)
 - ii. Use of existing data to support closure options
 - Concrete: Remediation relies on Debris Rule, not data
 - Vadose Zone Data: Has been validated (some adjustments possible)
 - Shallow Soil Data
 - iii. Soil Closure
 - Cleanup level for sulfate, arsenic
 - Confirmatory sampling requirements
- It is tentatively assumed that groundwater in the 100 Areas will not be used for direct human consumption. This is the basis for the proposed soil-ingestion based cleanup levels. Remediation based on these levels will not preclude further remedial action that may follow if site usage accommodates groundwater usage.

DISTRIBUTION

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E. M. Mattlin	RL	A5-15
B. W. Mathis	CHI	X5-53
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ADMINISTRATIVE RECORD: 183-H Solar Evaporation Basins Closure, T-1-4 [Care of EDMC, WHC (H6-08)]

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