

Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 2101-M Pond
345 Hills Street, Conference Room 9
and
Federal Building, Room 387E
Richland, Washington

Meetings Held October 2 and October 5, 1992

2101-M Pond Closure Plan, Unit Managers' Approval

Robert G. McLeod Date: 10-29-92
Robert G. McLeod, RL, Unit Manager, ERD/ERB

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

Elizabeth A. Wiley Date: 10-29-92
Elizabeth A. Wiley, Washington State Department of Ecology, Unit Manager

Fred A. Ruck III Date: 10/29/92
Fred A. Ruck III, WHC, Contractor Representative

Not Present Date: _____
Micheal A. Mihalic, WHC, Contractor Representative

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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 - Statement of Issue
- Attachment #6 - Position Statement, U.S. Department of Energy
- Attachment #7 - Key Questions
- Attachment #8 - DSI, R.G. McLeod, RL to E.A. Wiley, Ecology, 2101-M POND
VALIDATED DATA PACKAGE, October 1, 1992



Attachment #1

Summary of Discussion

2101-M Pond Closure Plan
Meetings Held October 2 and October 5, 1992

Summary of Discussion

Review, Amend, Approve, and Distribute Prior Meeting Minutes: The July 24, 1992 Unit Manager Meeting Minutes were distributed and signed.

Discuss NOD Renumbering: The NODs should be renumbered to be consecutive. It was agreed that the numbers would continue from the comments submitted on revision 0. They will start at 115 and continue consecutively.

Validated Phase II Data Submittal: Ecology was told that the validated phase II data was being transmitted at the meeting (Attachment #8) and would be followed up with a formal letter. Also being transmitted was additional raw QA/QC data that the laboratory had provided.

Discuss Issue Resolution: The background leading up to the issue resolution process was summarized by RL (Bob McLeod). An issue statement (Attachment #6) was presented for Ecology to review and provide input into. As a result the issue was refined and agreed upon by both RL and Ecology.

The meeting was interrupted at 11:30 am. The meeting reconvened at 12:30 on Monday, October 5, 1992.

Key questions (Attachment #7) were discussed and as a result the following Ecology position was worked out and concurred with by Ecology (Elizabeth Wiley).

Ecology's Position:

- Ecology's stated position is that CLP protocols are not required for sampling and analyses for clean closures as has been interpreted by RL. Ecology is requiring that stand-alone data packages for CLP or SW-846 analytical protocols be provided by DOE-RL for clean closures with no consideration given to cost to DOE-RL. Ecology will specify deliverables prior to the sampling event for non-clean closure sampling events.

(RL mentioned that the Ecology statements in the B-Pond NODs and in the draft site-wide permit presently require CLP protocols and should be changed to match Ecology's stated position.)

- For sampling events related to clean closure in which 100 samples or less are taken:
 - Ecology will take split samples for 100% of samples acquired by RL and will analyze 100% of the splits using CLP or

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Summary of Discussion (continued)

SW-846 protocols with stand-alone data deliverables. Ecology or a contractor of Ecology will validate 100% of this data.

- Ecology will request stand-alone deliverables from RL for 100% of the samples acquired by RL.
 - Ecology or its contractors will perform independent data validation at a QA level determined by Ecology for 100% of the samples acquired by RL.
- For sampling events related to clean closure in which greater than 100 samples are taken:
- Ecology will take split samples for a specified percentage of the total number of samples acquired by RL, to be determined on a case by case basis. Ecology will analyze 100% of their splits using CLP or SW-846 protocols with stand-alone data deliverables. Ecology or a contractor of Ecology will validate 100% of this data.
 - Stand-alone deliverables will be required from RL for their set of the split samples.
 - Ecology will perform independent data validation at a QA level determined by Ecology for 100% of the specified percentage of samples acquired by RL.

Ecology Justification: Public interest groups have raised a heighten level of interest in the sampling data at Hanford. An increased level of confidence in the quality of data is necessary to meet the public interest groups concern.

There is currently no state-wide QA/QC or validation requirements. Data validation requirements are determined by individual Ecology project officers. Ecology has initiated discussions between the programs on state wide QA/QC standards. Ecology is including QA/QC requirements in the Hanford Facility Site-Wide Permit.

This was followed by an explanation of the RL's position as outlined by Attachment #6.

Action Item:

The Issue Analysis Worksheet will be rewritten to include the modified issue and positions and will be faxed to Ecology along with draft meeting minutes for review.

The next unit managers meeting was tentatively scheduled for October 28, 1992 in Richland, Washington.

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Attachment #2

Agenda

2101-M Pond Closure Plan
Unit Managers Meeting

Meetings Held October 2 and October 5, 1992

- Review, Amend, Approve, and Distribute Prior Meeting Minutes
- Discuss NOD Renumbering
- Validated Phase II Data Submittal
- Discuss Issue Resolution

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Attachment #4

Action Items

2101-M Pond Closure Plan
Unit Managers Meeting

Meetings Held October 2 and October 5, 1992

<u>Action Item</u>	<u>Description</u>
6-4-91:1	WHC will produce a definitive sampling schedule for 2101-M Pond and fax a copy to Megan Lerchen (Ecology) as well as provide a copy to Cliff Clark and Sandy Trine (RL). Action: Fred Ruck III CLOSED
7-11-91:1	Determine what the standard sampling procedures are in regards to maintaining the security of sampling vials and other equipment and report to Ecology. Action: Bill Cox. CLOSED
7-11-91:2	Forward the completed Ecological Risk Assessment to Ecology by the first week in September 1990. Action: Jim Hoover. OPEN
5-27-92:1	Ecology will provide a formal letter to RL requesting additional data for validation of the Phase II sampling results. Action: E. Wiley CLOSED (6/4/92)
10-5-92:1	The Issue Analysis Worksheet will be rewritten to include the modified issue and positions and will be faxed to Ecology along with draft meeting minutes for review. Action: R.G. McLeod NEW

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STATEMENT OF ISSUE

Ecology is requesting additional QA/QC raw data associated with sampling and analyses. In addition, Ecology is requesting this information be transferred to CLP equivalent forms to make a TSD closure decision. However, RL/WHC maintains that the additional QA/QC raw data and types of forms requested by Ecology are not necessary to perform data validation as established by WHC-CM-5-3. This issue pertains to RCRA soil and groundwater sample and analyses data.

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POSITION STATEMENT

U.S. DEPARTMENT OF ENERGY:

- **The level of QA/QC and validation should be based on the DQO process.**
 - **The evaluation of available data sets must be performed before determining whether or not additional QA/QC raw data should be requested.**
-
- **Ecology's request for additional QA/QC raw data is unnecessary for data validation. Current level of validation is sufficient to determine if data satisfies the DQO process.**
 - **WHC-CM-5-3 validation procedures and the laboratory QA/QC plans were specified in the closure plan submitted to Ecology prior to the sampling and analysis activity. In the absence of Ecology comments, concurrence with the plan was assumed.**

KEY QUESTIONS

- 1. Does Ecology concur that validation shall be based on DQO's as stated in the Tri-Party Agreement, or is it Ecology's position that a uniform requirement for validation be based on the functional guidelines for the CLP?**
- 2. Does Ecology concur that sufficient QA/QC raw data been submitted to conduct adequate data validation?**
- 3. Does Ecology concur that the appropriate analytical methodology is that prescribed by 40 CFR 260.11?**
- 4. Judging by the QA/QC data requested by Ecology, it appears that Ecology is conducting a data quality audit. Does Ecology plan to audit the quality of all data for all RCRA closures?**

DON'T SAY IT ---Write It!

DATE: October 1, 1992

TO: E. A. Wiley, Ecology

FROM: R. G. McLeod, RL

Telephone: 372-0096

cc: R. N. Krekel, RL A5-15
 F. A. Ruck, WHC H4-57
 M. A. Mihalic, WHC L4-88

SUBJECT: 2101-M POND VALIDATED DATA PACKAGE

Enclosed is the validated data package from the June 1991 phase II sampling activity at the 2101-M Pond. The laboratories used for these analyses were Data Chem and S-Cubed. This submittal fulfills the U.S. Department of Energy, Richland Field Office (RL) responsibility under the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) to provide validated data to the State of Washington Department of Ecology. Because this validated data package is being delivered during a Unit Managers Meeting under this DSI, a formal transmittal letter from RL will follow.

Also enclosed is all of the laboratory quality assurance/quality control (QA/QC) raw data that was received from the laboratories that performed the analyses. This package duplicates some of the data already submitted to Ecology, and contains some of the QA/QC raw data Ecology has requested. However, the package does not contain all of the QA/QC raw data that Ecology has requested. The type and quantity of data is established by the contracts in existence with the laboratories. It should be noted that this amount of data may not be received in the future from the laboratories contracted to perform SW-846 analyses for Resource Conservation and Recovery Act (RCRA) units.

RL wishes to reiterate its position that the additional QA/QC raw data and types of forms that are being requested by Ecology are not necessary to perform data validation as established through the data quality objectives process.

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