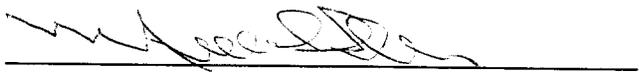


Meeting Minutes – Approval

M-026 LDR Report Project Manager Meeting Minutes
at
Federal Building/Room 340
Richland, Washington
Meeting Held January 28, 2010
11:30am to 12:00 noon

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting. Signatures denote concurrence with content only and do not imply agreement or commitments.


Date: 25 Feb 10
Mike Collins, Project Manager, DOE-RL


Date: 25 FEB 2010
Ron Koll, Project Manager, DOE-ORP


Date: 2/25/10
Deborah Singleton, Project Manager, Washington State Department of Ecology

Contractor Concurrence


Date: 2/25/2010
Chris Wollam, LDR Report Coordinator, MSA

Purpose: Discuss LDR Report related topics
The attached minutes are comprised of the following:
Attachment 1 - Meeting Agenda / Minutes
Attachment 2 - Attendance List
Attachment 3 - Actions and Workshop Items

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Attachment 1
M-026 LDR Report Project Manager Meeting
at
Federal Bldg/Room 340
Richland, Washington
Meeting Held January 28, 2010
11:30am to 12:00 noon

Meeting Agenda & Minutes

1. Last meeting minutes (October 22, 2009):
Complete, previously approved.

2. Hot topics
 - Status of 2009 Full LDR Report: On Schedule
Tony Miskho reported that CHPRC will no longer ship untreated, non-compliant waste to the Solid Waste Operations Complex (SWOC). Other contractors will need to obtain an exception from DOE if they wish to ship such waste to SWOC. This will drive elimination of several Location Specific Data Sheets and creation of one new Treatability Group in the CY2009 Report. Mike Collins added that additional changes to HNF-EP-0063 are coming.

 - Status of Macro-encapsulation (Pb) LDR DET:
No Report

 - Status of Site-Specific Macro-encapsulation (Ba) LDR Variance:
Complete, see attached.

 - Site handling of Draeger Tubes:
Ron Koll reported that Tank Farms and 222-S Laboratory have largely replaced detector tubes with direct reading instrumentation. Their combined total generation rate is about two pounds per year and is disposed routinely with other waste (hazardous or non-hazardous as appropriate). WTP generates a similar amount. Tony Miskho added that CHPRC also handles detector tubes routinely with the appropriate waste depending on the specific type of tube. As there are no LDR issues related to disposal of detector tubes, the question will be considered answered.

 - LDR variance: CHPRC beryllium powder:
The document has been submitted to DOE and will be forwarded to Ecology in mid February. See Action Items attached.

 - Other ?
None

3. Storage Assessments/Data Gap Plans provided to TPA Lead Regulatory Agency Project Managers and updates of ongoing assessments

- Discuss path forward for the following locations.
 - IMUSTs not associated with a building (CHPRC)
 - 224-B (CHPRC)
 - 242-B/BL (CHPRC)
 - 270-W (CHPRC)

Disposition path forward for these locations needs to be determined, discussion will continue in 2010. Therefore these assessments will be included in the CY2009 LDR Report as to be done in 2011.

4. Action Item Status (See Attachment)

5. Next meeting (date and time): Tentative: February 25, 2010; Federal Bldg. rm. 340

Attachment 2

**M-026 LDR Report Project Manager Meeting Minutes
at
Federal Building/Room 340
Richland, Washington
Meeting Held January 28, 2010
11:30am to 12:00 noon**

Attendance List

<u>Name</u>	<u>Organization</u>
K. Christensen	WCH
M. Collins	DOE-RL
K. Conaway	Ecology
D. Flyckt	CHPRC
R. Koll	DOE-ORP
A. Miskho	CHPRC
C. Wollam	MSA

Attachment 3

M-026 LDR Report Project Manager Meeting Minutes
at
Federal Building/Room 340
Richland, Washington
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Actions and Workshop Items

<u>Action #</u>	<u>Responsible Party</u>	<u>Description</u>	<u>Date Closed</u>
1	C. Wollam	Draft and Distribute 10/22 Meeting Minutes	12/08/09
2	TBD	Distribute IMUST spreadsheet to LDR PMM working group (see Minutes, item 3)	TBD
3	Contractors	Provide candidate streams for Macro-encapsulation DET to DOE PM and Working Group.	12/31/09
4	Contractors	Review WCH method for Draeger Tube® disposal; Can other contractors use the same method? If not, why not?	01/28/10
5	C. Wollam	Draft and distribute January 28 Meeting Minutes	
6	M. Collins	Review CHPRC Beryllium Powder Variance/Petition and forward to Ecology. Target date: February 18, 2010	

Electronic Distribution:

J. Ayres	Ecology
L. Bostic	BNI
A. E. Carvo	WRPS
K. R. Christensen	WCH
M. Collins	DOE-RL
K. A. Conaway	Ecology
D. L. Flyckt	CHPRC
R.J. Koll	DOE-ORP
M. E. Lewis	WCH
A. G. Miskho	CHPRC
A. Okemgbo	Ecology
M. G. Peloquin	WCH
L. D. Romine	DOE-RL
I. L. Siddoway	WCH
D. Singleton	Ecology
H. T. Tilden	PNNL
O. S. Wang	Ecology
B. D. Williamson	DOE-RL
C. Wollam	FH
^ADMINISTRATIVE RECORD: M-026 LDR Report	
^Correspondence Control- PHMC	
^Environmental Portal	



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

August 21, 2009

Mr. David A. Brockman, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Approval of Site-Specific Land Disposal Restrictions (LDR) Variance Request

Dear Mr. Brockman:

The Department of Ecology (Ecology) received a petition for an LDR site-specific variance pursuant to Washington Administration Code (WAC) 173-303-140(2)(a) from the United States Department of Energy (USDOE) - Richland Operations Office and Pacific Northwest National Laboratory.

Ecology understands that your method of treatment of the subject mixed waste was by sulfate precipitation and subsequent macroencapsulation. This treatment resulted in appropriate stabilization of all underlying hazardous constituents with the exception of barium. Approximately five kilograms of D005 mixed waste did not pass the LDR barium treatment standard of 21 milligrams per liter via toxicity characteristic leaching procedure laboratory analyses for nonwastewaters.

The variance criteria of 40 CFR §268.44(h) (incorporated by reference into WAC 173-303-140[2][a]) apply to the petition for site-specific variance. Under that criteria, Ecology is approving a site-specific variance as it is "inappropriate" to require the waste to be treated by the method specified by the treatment standard per 40 CFR §268.44(h) (incorporated by reference into WAC 173-303-140[2][a]). USDOE adequately demonstrated through their LDR Variance Request that the method specified by the treatment standard would be technically inappropriate.

The specified LDR treatment method would require the subject waste to be pulverized and re-macroencapsulated to achieve treatment standards. However, this is a highly radioactive waste originating from the radiochemical processing laboratory's hot cells. Pulverizing the waste will create unnecessary and excessive worker safety risks. Based on this, Ecology agrees that treatment to the LDR D005 barium standard for this waste is technically inappropriate.



Mr. David A. Brockman
August 21, 2009
Page 2

We accept that your proposed alternative of providing additional macroencapsulation will provide equivalent performance to the specified treatment method without creating such worker safety risks.

Ecology conducted a public notice and comment period under the requirements of WAC 173-303-910(c) regarding the proposed approval of your requested variance. The comment period was 21 days, July 21, 2009 through August 10, 2009. Responses to comments are provided in our Responsiveness Summary available at www.ecy.wa.gov/giblio/nwp.html.

Ecology approves the USDOE's site-specific variance petition to encapsulate the subject waste in an additional high-density polyethylene-lined container system prior to disposal at the Hanford Site Low-Level Burial Grounds without further treatment.

If you have any questions, contact Michelle Mandis, CHMM, PE at 509-372-7970.

Sincerely,

Jane Hedges by E.A. Annairland

Jane A. Hedges
Program Manager
Nuclear Waste Program

mm/pll

cc: Dave Bartus, EPA Cameron Andersen, PNNL
 Dennis Faulk, EPA Harold Tilden, PNNL
 Larry Gadbois, EPA Dan Goade, EnergX
 Mike Collins, USDOE Gabriel Bohnee, NPT
 Steve Weil, USDOE Lela Buck, Wanapum
 Ty Blackford, CHPRC Russell Jim, YN
 Dean Nester, CHPRC Susan Leckband, HAB
 Rob Piippo, CHPRC Ken Niles, ODOE
 Judy Vance, FFS Administrative Record: PNNL/LDR/LLBG/325
 Chris Wollam, FH Environmental Portal
 Stuart Harris, CTUIR

Mr. David A. Brockman
August 21, 2009

bcc/electronic:

Rick Bond, Ecology
Lois Dahmen, Ecology
Doug Hendrickson, Ecology
Jane Hedges, Ecology
Michelle Mandis, Ecology
Deborah Singleton, Ecology
Ron Skinnerland, Ecology
Steve Szendre, Ecology

bcc: NWP Central File: PNNL/LDR/LLBG/325
NWP Reader File
WM Section Reader File