

Meeting Notes

Discussion of Milestones Related to Waste Management Area C Closure, SST Closure Plan content, and Permit modifications

Meeting Date: January 7, 2014
 Location: Ecology Building

Purpose: Discuss HFFACO milestones M-045-61, -62 and -82 to better define the relationships among these milestones and the content of the deliverables.

Attendees: Jeff Lyon (Ecology), Jared Mathey (Ecology), Maria Skorska (Ecology), Beth Rochette (Ecology), Joni Grindstaff (ORP), Lori Huffman (ORP), Mary Burandt (ORP), Doug Hildebrand (ORP), Tony Miskho (WRPS), Dan Parker (WRPS), Cindy Tabor (WRPS), Susan Eberlein (WRPS)

Background:

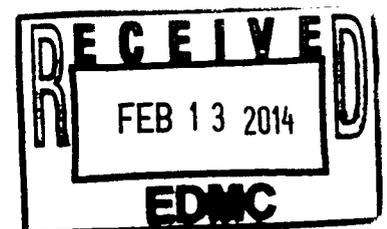
Hanford Federal Facilities Agreement and Consent Order (HFFACO) milestones M-045-61, M-045-62 and M-045-82 (copied below) have been listed as "to be missed" at the recent monthly project managers meetings. These milestones have been affected by budget constraints and delays in related activities. Today's meeting continues the process of defining what each deliverable under these milestones should comprise, and when these deliverables can be developed, to support progress on closure of Waste Management Area (WMA) C.

M-045-61	Submit to Ecology for review and approval as an Agreement primary document, a Phase 2 RCRA Facility Investigation/Corrective Measures Study Report for WMA C.	12/31/2014
M-045-62	Submit to Ecology for review and approval as an Agreement primary document a Phase 2 Corrective Measures Implementation Work Plan for WMA C.	06/30/2015
M-045-82	Submit complete permit modification requests for Tiers 1, 2, & 3 (see Appendix I) of the SST System, to support final closure requirements for WMA C.	09/30/2015

Topics discussed:

Discussion focused on the proposed content for the Tier 1 (Single Shell Tank [SST] System) Closure Permit Modification Request (referred to as the "Tier 1")

- The Tier 1 will address the SST system closure, but not more general information required for the Hanford Site closure.
- The Tier 1 should contain process information for the SST system. The SST system is not an operating unit, and the specific process information should be the information that relates to closure.
- The Tier 1 could contain high level information on equipment and process history, with more detailed information submitted for each WMA in the applicable Tier 2 Permit Modification Request (referred to as the "Tier 2").
- The high level list of SST system equipment is in the Part A, but the Part A is not yet in the Revision 8C permit.



WMA-C

- It was suggested that mapping the list of components currently in the Part A be mapped into either an updated Part A or into Addendum C.
 - The components listed in Part A should be those that “store” waste. Tony Miskho took an action to propose a definition for “storage” as part of this recommendation.
 - The more detailed component lists could be placed into Addendum C on a WMA by WMA basis (e.g. Addendum C1, C2, C3...for the various WMAs). These addenda would be updated with more detail over time for each WMA.
 - All the information currently in the Part would map somewhere.
 - This approach would simplify the modification process when additional detail is developed for each WMA, since an update to Addendum C could occur with a permit modification request.
 - The process for updating the Addendum C information over time needs to be described.
- Lori Huffman noted that the SSTs are going directly to closure and not to final status, so that there will not be a Part B.
- Jared Mathey noted that the Hanford Dangerous Waste Permit is a single final status facility wide permit that requires a complete Part B permit application and that the SSTs are a part of that final status permit.
- Tony Miskho suggested an approach where the Tier 1 becomes Addendum H, with the Tier 2 details becoming Addendum H1, H2, H3...etc. Under this approach all closure related information would be in Addendum H. This approach is similar to that used for some other units on the Hanford site.
- Mary Burandt indicated that the Tier 1 information looked a lot like process information, and so it did not seem like the Tier 1, 2, 3 construct was parallel to the other plans that were completely contained in Addendum H.
- Jeff Lyon indicated that the closure plans that were completely contained in Addendum H were mostly near term closure actions, while the SST system will be closing in steps over a period of about 40 years.
- It did not appear that the Tier 1 for the SST would map well to Addendum H, although possibly the Tier 2s could map to Addendum H.
- There was discussion of how to map schedule related information.
- There is a regulatory requirement for extension requests; the HFFACO milestone structure (M-045-00 series) should be used to address that requirement.
- The document that addresses the practicability of clean closure for the SST WMAs (referred to as the “clean closure document”) was discussed next.
- If the conclusion that clean closure is not practicable and is approved, then the remaining permit modification requests are no longer “contingent” closure plans, and therefore become “closure plans”.
- The process for submitting the “clean closure document” and getting approval of the practicability conclusion was discussed.
- Lori Huffman indicated that the “clean closure document” provides a description of what clean closure would entail to provide a basis for the practicability decision. It is not intended to represent a “clean closure plan”.
- Use of the Administrative Record to document the approval of the impracticability decision makes more sense than attempting to incorporate that approval into the permit. The permit needs to be enforceable.
- Jeff Lyon asked what steps would follow the approval of the practicability determination.

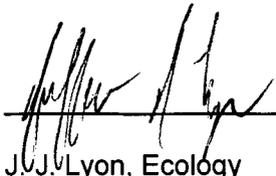
- Mary Burandt suggested that the approval may have conditions associated with it, regarding, for example, the next submittals or how follow-actions will be captured.
- The letter requesting approval, the basis documents, and the approval letter would all be captured in the Administrative Record. Fact sheets could be developed from this information to provide a basis for the permit modification requests to come.
- Jeff Lyon suggested that the submittal of the "clean closure document" reference the HFFACO milestones for future submittals and closure.
- Mary Burandt expressed a concern that until the decision for landfill closure is approved, permit modification requests based on landfill closure cannot be submitted.
- The following recommendations resulted from the discussion:
 - The Practicability Determination for clean closure of the Single Shell Tank waste management areas will be transmitted to Ecology by letter with a request for approval.
 - The anticipated means for approval is for Ecology to transmit a letter back (with any necessary conditions), and the set of documents and correspondence would be entered into the Administrative Record. A permit modification is not associated with this step of the process.
 - After the practicability determination that clean closure is not a practical closure option is approved, the Tier 1 closure permit modification request for landfill closure of the SST system may be submitted.
- There was additional discussion of the Addenda that would need to be submitted with the Tier 1 closure permit modification request. Tony Miskho handed out a sheet with a standard list of addenda for discussion. (attached)
- Jared Mathey suggested that for WMA C, the permit modification requests would be modifications to Revision 8C, and may only require Part A, Addendum C and Addendum H.
- There was a tentative agreement that:
 - The Tier 1 (SST system) closure permit modification request, and the Tier 2 (WMA C) and Tier 3 (component) closure permit modification requests required to close WMA C will be submitted as permit modification requests to Revision 8C of the permit.
- Details of the Tier 1 content need to be discussed at the next meeting.
- Jared Mathey indicated that he would provide an email list of items that he wanted to discuss to determine how they would be addressed in the Tier 1 process. That information will be provided with the next meeting agenda.

Actions:

- Bring a proposed definition of "storage" to the next meeting in order to facilitate discussion of what can be addressed in the Part A and what can be addressed in Addendum C. (Tony Miskho)

Concurrence:

 2/4/14
 J. F. Grindstaff, ORP Date

 2/10/14
 J.J. Lyon, Ecology Date