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Meeting Minutes

Unit Managers' Meeting
3718-F Alkali Metal Treatment and Storage Facility
2440 Stevens Center, Room 2200
Richland, Washington

Meeting Held August 29, 1995
From 2:00 to 3:30 p.m.

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

Ellen M. Mattlin Date: 9/28/95
Ellen M. Mattlin, Unit Manager, RL

Not Present

Date: _____
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Clinton D. Stuart Date: 9-28-95
Clinton D. Stuart, Unit Manager, Washington State Department of Ecology

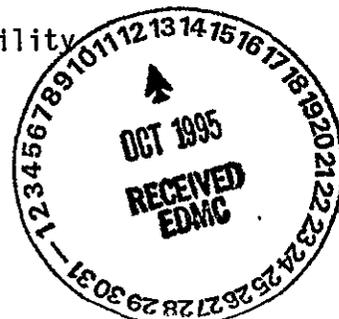
3718-F, WHC Concurrence

Fred A. Ruck, III Date: 9/28/95
Fred A. Ruck, III, Contractor Representative, WHC

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 5 - Letter DOE-RL to Ecology reduced RCRA surveillances at the 3718-F Alkali Metal Treatment and Storage Facility
- Attachment 6 - Summary of DQO Process held August 11, 1995



Attachment 1

**Unit Managers' Meeting
3718-F Alkali Metal Treatment Facility
2440 Stevens Center, Room 2200
Richland, Washington**

**Meeting Held August 29, 1995
From 2:00 to 3:30**

Agenda

1. **Meeting Minutes from UMM held July 25th**
2. **Status of Action Items**
 - Surveillance at 3718-F - open
 - Notes on 105-DR and 4843 DQO - closed
 - Future Plans for 3718-F - closed
3. **Results from DQO Meeting held August 11th**
 - Draft Minutes
 - Schedule for follow-on Inspection
(*Field Inspection - Oct 2-5 ?*)
4. **Closure Plan Submittal Schedule**

Submittal of Advance Copy to Ecology	10/01/95
(<i>Request to Delay Submittal ?</i>)	10/31/95
Request for Revision	03/01/96
Effective Date	07/01/96
5. **New Business**
6. **Set Date for Next Meeting**
(September 21 or 28th ?)

Attachment 2**Unit Managers' Meeting**

**3718-F Alkali Metal Treatment and Storage Facility
2440 Stevens Center, Room 2200
Richland, Washington**

**Meeting Held August 29, 1995
From 2:00 to 3:30 p.m.**

Summary of Discussion and Commitments/Agreements**1. Surveillance at the 3718-F**

A copy of the letter requesting a change in the surveillance required for RCRA at the 3718-F Facility was provided by Ellen Mattlin (DOE-RL) to Clint Stuart (Ecology). The letter requests that the weekly inspection requirement be reduced to semiannual. The basis for this request includes:

1. All dangerous waste has been removed from the facility
2. The unit will remain vacant until all closure activities are complete and closure certification is complete
3. The facility will remain locked to control access

A copy of the letter is provided as Attachment 5.

2. Future use of building/sheds/reaction vessels

Doug Chapin (DOE-RL) reported that there are no plans for future use of the 3718-F Facility. Stephanie Johanson reported that the plan for remediating the 300-FF-2 Operable Unit has not been completed. It was agreed that the facility will be clean closed and this action will satisfy any future need.

3. Closure activities

A strategy for closure of the 3718-F Facility was discussed and general agreement was reached. A summary of the action plan is outlined in Attachment 6. The greatest uncertainty is associated with the handling of the burn building and scrubber component of 3718-F Facility. An additional inspection is scheduled for October 5, 1995 to better examine this component once the external shell (cover plates) have been removed to expose the baffles and inside surface of the unit. Three components; storage building and floor, reactor vessels (tanks), and concrete pad will be clean closed based on the 'action levels' identified in the Data Quality Objective (DQO) process and the inspections that have been conducted. It has been agreed that remediation of the soil will be deferred pending the remediation of the 300-FF-2 Operable Unit (see Attachment 6 for additional information).

4. Schedule for closure

Modification B to the Hanford Site Permit is scheduled to be issued March 1, 1996. The goal is to have the 3718-F Alkali Metal Treatment and Storage Facility Closure Plan approved by that date. To satisfy this goal, the RCRA Closure Staff will provide Ecology with an advanced draft copy of the changes to the existing plan (DOE/RL-91-35, Rev. 1) by September 18, 1995. This draft will include the closure strategy outlined in Attachment 6. To satisfy this schedule a plan for clean closing the burn building and scrubber will be assumed. The validity of this assumption will be determined during the inspection of this component scheduled to be completed on October 5, 1995.

An alternate schedule was provided by Ecology for discussion. A copy of this schedule is attached. Although it was agreed that this schedule could result in shaving approximately one to two months off the time required for closure, it was generally concluded that it might not be worth the effort.

5. New Business

Ellen Mattlin introduced Stephanie Johanson. Stephanie has agreed to accept the position created by Joan Bartz resignation. Joan has accepted a position working for Ecology in a new capacity. We welcome Stephanie and wish Joan the best.

6. Set Next Meeting Date

The next meeting is scheduled for Thursday, September 28, 1995 beginning at 2 pm.

Closure Plan Time Schedule for 3718F

	<u>Action</u>	<u>Closure Plans</u>	<u>Complete By</u>
1.	Ecology review of Revision 0 and NODs -	90 days	
2.	DOE response (NOD response table) -	90 days	
3.	Ecology review of response table -	90 days	
4.	Issue resolution workshops -	180 days	
5.	DOE issue of Revision 1 -	90 days	
6.	Ecology review of Revision 1 -	60 days	
7.	DOE response (NOD response table) -	60 days	
8.	DOE page change revisions -	60 days	8-29-95
9.	Ecology final review and letter to DOE -	60 days	9-15-95
10.	Public comment period -	45 to 60 days	11-1-95
11.	Responsive summary to comments and plan - approval and inclusion in facility wide permit	30 to 60 days	12-1-95
12.	DOE certifies closure -	180 days	6-1-96
13.	Ecology writes a letter to DOE acknowledging receipt of the closure certification.		
14.	A new Part A/ Form 3 is submitted by the responsible owner/operator stamped or marked across the front "CLOSED" and dated.		
15.	Upon receipt of the new Part A/Form 3, Ecology will notify EPA by sending a copy of the new Part A/Form 3 stating that Ecology concurs on closure and asking that it be marked "inactive" in the EPA database and RCRA list. The responsible owner/operator has then fulfilled their responsibilities and the project is complete.		

Attachment 3

Unit Managers' Meeting
 3718-F Alkali Metal Treatment and Storage Facility
 2440 Stevens Center, Room 2200
 Richland, Washington

Meeting Held August 29, 1995
 From 2:00 to 3:30 p.m.

Attendance List

A stenographer is present to take detailed notes on the proceeding of this meeting. These notes will be used for the sole purpose of preparing the unit manager meeting minutes. After these unit manager meeting minutes are finalized the detailed notes will be discarded.

Name	Organization	Phone #
T.C. Sonnichsen	WMC-Permitting	376-9956
P.C. Miller	WMC-FFTF	376-0441
DE ROOHR	WMC-TEOF	374-3420
G.P. Davis	Ecology	736-3025
D.H. Chapin	RL-TPD-FFTF	373-9396
ELLEN MATTUN	DOE-RL	376-2385
Kathy Knox	WMC	372-3596
FREDA RUCK III	WMC/RCRA Closure	376-9876
Christina	Ecology	736-3010
* Stephanie JOHANSEN	DAMES & MOORE	946-3693

* ADDED BY T.C. Sonnichsen 8/29

Attachment 4

Unit Managers' Meeting
3718-F Alkali Metal Treatment and Storage Facility
2440 Stevens Center, Room 2200
Richland, Washington

Meeting Held August 29, 1995
From 2:00 to 3:30 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
07-25-95-1	C. D. Stuart (Ecology) to determine Ecology's position on reducing the frequency of surveillances at the 3718-F. CLOSED (8/29/95)
07-25-95-2	J. C. Sonnichsen (WHC) summarize information on the 4843 and 105-DR DQO meetings and to summarize any discrepancies found in the background section of the closure plan [to be provided by D. E. Roohr (WHC)]. Information to be provided by July 31, 1995. CLOSED (8/29/95)
07-25-95-3	D. H Chapin (RL) and P. C. Miller (WHC) to check records and information on near-by activities to determine if any sampling and analyses has occurred near the 3718-F. CLOSED (8/29/95)
08-29-95-1	J. C. Sonnichsen (WHC) to provide advanced draft of revised 3718-F Facility closure plan to Ecology by September 18, 1995.
08-29-95-2	P. C. Miller (WHC) to make arrangements to have burn pan lowered and cover plants removed allowing inspection of the burn building and scrubber by October 5, 1995.

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Attachment 5

**Unit Managers' Meeting
3718-F Alkali Metal Treatment and Storage Facility
2440 Stevens Center, Room 2200
Richland, Washington**

**Meeting Held August 29, 1995
From 2:00 to 3:30 p.m.**

A letter from DOE-RL to Ecology requesting a change in the schedule for RCRA surveillance at the 3718-F Alkali Metal Treatment and Storage Facility



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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

AUG 29 1995

95-PCA-473

Mr. Moses N. Jaraysi
Unit Supervisor
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336-6018

Dear Mr. Jaraysi:

REDUCTION OF WEEKLY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) TREATMENT/
STORAGE/DISPOSAL (TSD) UNIT INSPECTIONS AT THE 3718-F ALKALI METAL TREATMENT
AND STORAGE FACILITY

The U.S. Department of Energy, Richland Operations Office (RL) and the Westinghouse Hanford Company (WHC) are requesting that weekly RCRA TSD unit inspections of the 3718-F required by Washington Administrative Code 173-303-320, be reduced to semiannual inspections for the following reasons:

1. All dangerous waste has been removed from the building.
2. The unit will remain vacant until closure activities and closure certification is complete.
3. The unit will remain locked to control access.

The 3718-F unit will remain vacant and under controlled access until clean closure has been completed and certified. This will occur after July of 1996, when the 3718-F Closure Plan becomes part of the Hanford Facility RCRA Permit, Modification B. Since no dangerous waste remains at the building, reducing the frequency of RCRA TSD unit inspections will result in resources being made available for higher priority work.

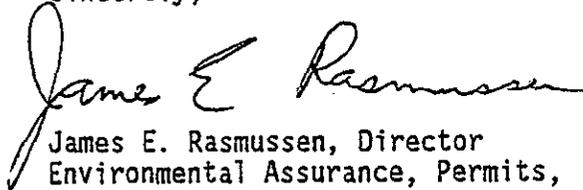
Mr. Moses N. Jaraysi
95-PCA-473

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AUG 29 1995

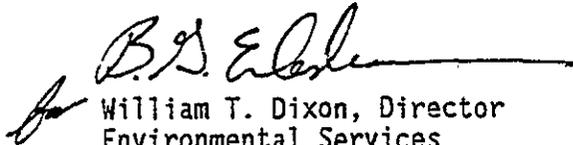
Should you have any questions, please contact Ms. E. M. Mattlin, RL, on (509) 376-2385 or Mr. F. A. Ruck III, WHC, on (509) 376-9876.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:EMM



William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company

cc: Administrative Record
EDMC, H6-08
Ecology Library
W. Dixon, WHC
D. Duncan, EPA
R. Jim, YIN
S. Moore, Ecology
D. Powaukee, NPT
S. Price, WHC
F. Ruck III, WHC
C. Stuart, Ecology
J. Wilkinson, CTUIR

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Attachment 6

**Unit Managers' Meeting
3718-F Alkali Metal Treatment and Storage Facility
2440 Stevens Center, Room 2200
Richland, Washington**

**Meeting Held August 29, 1995
From 2:00 to 3:30 p.m.**

SUMMARY OF DQO PROCESS HELD AUGUST 11, 1995

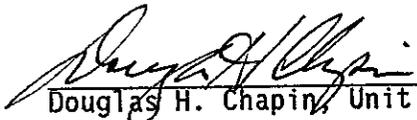
Meeting Minutes

Data Quality Objectives Meeting
3718-F Alkali Metal Treatment and Storage Facility
2440 Stevens Center, Room 2200
Richland, Washington

Meeting Held August 11, 1995
From 8:00 to 11:00 a.m.

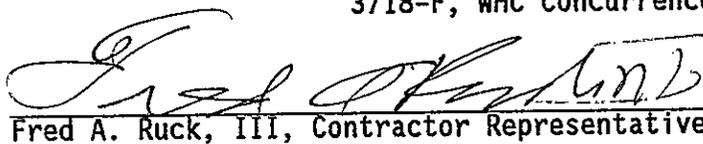
The undersigned indicate by their signatures that the, "SUMMARY OF RESULTS FROM THE DATA QUALITY OBJECTIVES (DQO) PROCESS", reflect the actual occurrences of the above dated Data Quality Objectives Meeting.

 _____ Date: 10/5/95
Ellen M. Mattlin, Unit Manager, RL

 _____ Date: 10/5/95
Douglas H. Chapin, Unit Manager, RL

 _____ Date: 10-5-95
Clinton D. Stuart, Unit Manager, Washington State Department of Ecology

3718-F, WHC Concurrence

 _____ Date: 10/5/95
Fred A. Ruck, III, Contractor Representative, WHC

SUMMARY OF RESULTS FROM THE DATA QUALITY OBJECTIVES (DQO) PROCESS

A meeting was held on Friday, August 11, 1995 to develop the Data Quality Objectives (DQOs) for closure of the 3718-F Alkali Metal Treatment and Storage Unit. The meeting and discussion was facilitated by Andrea Prignano. A set of the view graphs used during the meeting and an attendance sheet is attached. A summary of the items that were discussed and agreements that were reached follows:

Compounds of Interest:

Waste sodium, lithium, and potassium were burned in the burn shed. Small amounts of gasoline/diesel were used to ignite the burn. Sodium contaminated equipment was cleaned in reaction vessels using either a water or alcohol bath (methanol, isopropanol and 2-butoxyethanol (Dowanol)). These processes resulted in the list of compounds shown in the attachment. Those in attendance agreed whatever metal oxides that might have remained after treatment have since been transformed into carbonates through exposure.

Unit Operations:

The treatment and storage unit was divided into 5 sections for purposes of discussion. The division of the unit allowed the team to better focus on the various storage and treatment activities (unit operations) that took place at the Treatment, Storage, and Disposal (TSD) unit. The five sections consisted of; a storage building, a concrete pad and floor, a burn shed/scrubber system, reactor vessels for cleaning sodium contaminated equipment, and the surrounding soil. Dave Roohr was the subject matter expert on the operation of the TSD and his insight and knowledge was appreciated by the team. Dave stated that during the operation of the facility a second water reaction vessel was located on the concrete pad in tandem with the vessel that remains. This unit was removed in the late 1980's.

Action Levels and Strategy for Cleanup:

Proposed action levels for both soil and structures were proposed and discussed. These action levels and the following three key questions set the stage for development of the cleanup and closure strategy.

- o What is the relationship between the closure of the TSD and closure of 300-FF-2 Operable Unit ?
- o Are there any future plans for usage of the burn shed and/or scrubber system ?
- o How do the proposed actions for cleanup and closure compare with similar operations and closure decisions at the 105-DR and 4843 TSDs ?

Discussion:

- o For soils, information from the Hanford Site background study should be used as a reference for the elemental metals.
- o Recent excavations in the vicinity of the TSD probably rendered any collection of soil sampling to be inconclusive.
- o There are no future plans for the burn building and scrubber. Since these structures were fabricated from carbon steel, these structures have little if any monetary value.
- o The water and alcohol cleanup tanks (reaction vessels) were fabricated from stainless steel and will be recycled.
- o Cleanup and closure of the storage building will build on the experience obtained from closing the 4843 Alkali metal storage TSD.
- o Action levels will be set at 10 wt. percentage for all Category D waste and a visual inspection will serve as a basis for the clean up of the storage building, concrete pad, burn shed/scrubber, and reaction vessels.
- o It was assumed that the acceptance criteria (transfer of closed TSD to the 300-FF-1 Operable Unit) would be satisfied by clean closure of the unit. All human health, safety, and environmental issues will be addressed prior to transfer.

Cleanup Strategy:

The DQO team agreed on the following cleanup and closure strategy.

SOIL: No soil samples will be collected. It was agreed that the combination of the compounds of interest (organics and carbonates), nature of the soil (sand and gravel, variability of alkali metal background levels), and past excavations, would render the results obtained from any collection and analysis strategy to be inconclusive. The soil in the vicinity of the 3718-F Facility has been disturbed on several occasions by the placement of communication and power lines, and upgrading the process sewer.

STORAGE BUILDING: A visual inspection of the storage shed and concrete floor will be performed. If no evidence of contamination (carbonate residue) is observed, i.e., less than 10 wt. percent, the building will be clean closed. The interior concrete pad and interior walls will be swept. The sweepings will not be collected. Process knowledge using the experience gained from samples collected and analyzed at the 4843 Facility was the basis for this decision.

CONCRETE PAD: The outside concrete pad will be left in its present condition. It was agreed that any contaminant of interest on the surface of the pad had been sufficiently weathered over the years so that any sampling and analysis for the Category D waste seemed unwarranted. The outside pad will not be swept or brushed and is accepted as clean.

REACTION VESSELS: The reaction vessels will be cleaned and excessed. This will allow for any reuse and/or recycle of this equipment. The reaction vessels will be removed and excessed.

BURN BUILDING AND SCRUBBER: It was agreed that additional information was needed before a decision on closure of this structure could be made. It was further agreed that WHC would take the action to remove the cover plates and lower the burn pad to provide a better visualization of any potential health hazard. The possibility of using a video camera and a cutting torch to provide a better exposure of where contamination may reside was discussed. It was further agreed that WHC may exercise these options if necessary to assess the hazard. Once the structure has been prepared, i.e., cover plates removed, etc. a meeting will be convened and a visual inspection of the burn building, scrubber, and concrete pad inside the burn building will be performed. A decision will be made in the field on the necessary actions to be taken for cleaning and/or treatment of this structure. The action level will be 10 wt. percent.

CLOSURE PLAN: The closure plan (DOE/RL-91-35, Revision 1) will be revised to incorporate the results from the DQO meeting. Chapters 6 and 7 will be revised to address the cleanup strategy summarized above. Chapters 3 and 4 will be revised to incorporate comments received from Dave Roohr (subject matter expert).

SAMPLING AND ANALYSIS PLAN: Preparation of a separate sampling and analysis plan is not planned at this time. This decision is subject to change pending the future inspection of the burn building and scrubber.

Other Items of Interest:

It was agreed that all future meetings of the DQO Team and UMM will be held on Thursdays and Fridays.

**3718-F Closure
DATA QUALITY OBJECTIVES MEETING
Friday, August 11, 1995**

Compounds of Interest:

**Lithium Carbonate
Sodium Carbonate
Potassium Carbonate**

**Methanol
i-Propanol
2-Butoxyethanol**

Divide the Unit into Five Parts:

- 1) Storage building**
- 2) Concrete (pad and floors)**
- 3) Burn Shed/Scrubber System**
- 4) Reaction Vessels**
- 5) Soils**

Future Uses or Removal Options:

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Performance Standards/Action Levels:

WAC 173-303-610(2)(b) and Permit II.K.1 and 2

- for soils: MTCA and Background
- for structures: set by Ecology in accordance with WAC 173-303-610(2)(a)(ii)

Component	MTCA "B"	Sitewide Bkg
Lithium	---	37 ppm
Sodium	---	1393
Potassium	---	3090
Methanol	40,000 ppm	---
i-Propanol	---	---
2-Butoxyethanol	---	---

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Proposal for Structures and Concrete Pad:

- **sweep/brush to remove all material possible**
- **waste generated to be disposed of appropriately**
- **action level: designation limit from WAC 173-303-100**
 - **all compounds are category D waste**
 - **10 wt percent action level**
- **perform a visual inspection only**

**If structures/pad do not meet inspection criteria -
repeat above or perform a high pressure water wash
or remove contaminated portion
or repeat DQO.**

- **Burn Shed/Scrubber and Reaction Vessels**
- if no future use -- dismantle and remove

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Proposal for Soils:

- **Are soils of concern?
boundary?
locations of samples?
depth of soil samples?**

- **use MTCA B and Sitewide background**

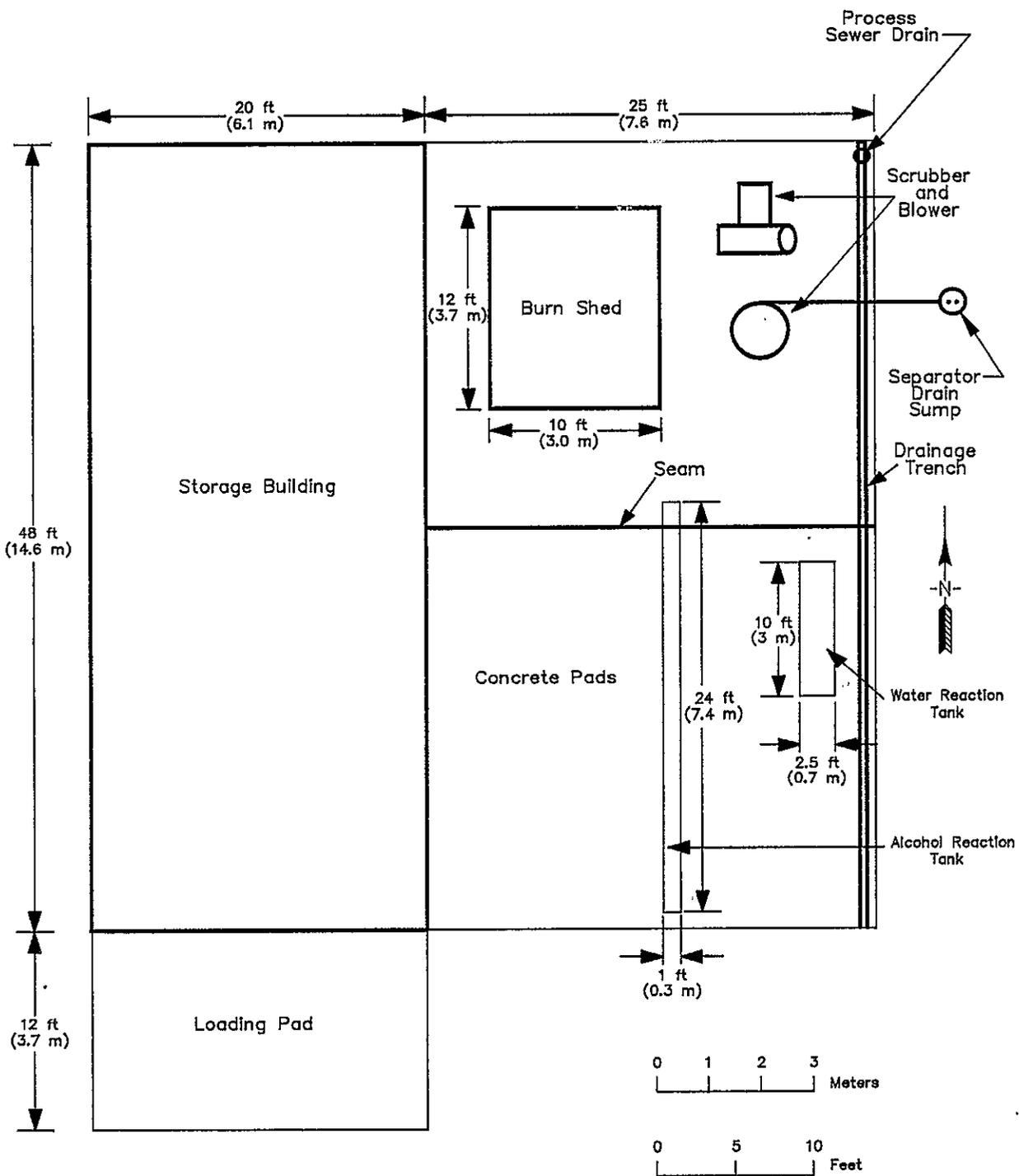
metals: Bkg levels are for metals, not for carbonates

organics: MTCA for methanol only (40,000 ppm)

propose 10 wt percent for other organics

- **analytical methods for soils:
field methods?
metals: SW-846, method 6010
organics: SW-846, method 8050**

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Figure 2-3. The 3718-F Facility Layout.

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Distribution:

F. T. Calapristi	WHC	B2-35
R. M. Carosino	RL	A4-52
D. H. Chapin	RL	N2-36
G. P. Davis	Ecology	B5-18
D. L. Duncan	EPA	HW-106 (Seattle)
S. K. Johanson	GSSC	B1-42
P. J. Mackey	WHC	B3-15
E. M. Mattlin	RL	A5-15
P. C. Miller	WHC	N2-57
S. M. Price	WHC	H6-23
A. L. Prignano	WHC	H6-23
D. E. Roohr	WHC	L6-05
F. A. Ruck III	WHC	H6-23
J. C. Sonnichsen	WHC	H6-23
C. D. Stuart	Ecology	B5-18
R. W. Szelmezcza	WHC	L6-05
J. L. Waite	WHC	B2-35
GHL/RCRA File	WHC	H6-23
Field File Custodian		H6-08

ADMINISTRATIVE RECORD: 3718-F Alkali Metal Treatment and Storage Facility
TS-3-3 [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101,
Mail Stop HW-074 (Record Center)

Please send comments on distribution list to John C. Sonnichsen, Jr. (H6-23),
509-376-9956.