

# START

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Meeting Minutes Transmittal - Approved

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington



Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

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

*Randall N. Krekel* Date: 5-17-94  
Randall N. Krekel, Unit Manager, RL

Not present. Date: \_\_\_\_\_  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

*Alisa D. Huckaby* Date: 5-17-94  
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

4843 Alkali Metals Storage Facility, WHC Concurrence

*Fred A. Ruck III* Date: 5/17/94  
Fred A. Ruck III, Contractor Representative, WHC

*J. A. (Mickey) Seamans* Date: 5/17/94  
J. A. (Mickey) Seamans, 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 - NOD Response Table Summary of Open Comment Status, April 13, 1994
- Attachment 6 - Form 5, Page 814 of Volume 3 of the 1992 Annual Dangerous Waste Report
- Attachment 7 - Uniform Hazardous Waste Manifest and Hazardous Waste Disposal Analysis Record for the Organic Waste Drum

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Attachment 1

Unit Managers Meeting  
----- 4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington

Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

Agenda

1. Approval of Past UMM Minutes
2. Status Action Items
  - 7-14-93:1
  - 7-14-93:2
  - 2-28-94:1
  - 3-17-94:1
3. Status Closure Activities
  - Radiation Survey Discussion
  - Status of RL/WHC response to NOD Comments
    - Summary of Past Issue Resolution Workshops
    - Status on response to Comment No. 15 (action levels)
    - Status on response to Comment No. 61 (cost estimates)
    - Status on response to Comment No. 69, 70, 71 (adding material to the administrative record)
  - Response to Ecology's concerns on Annual Dangerous Waste Report Form 5
4. New Business
  - None
5. Set Next Meeting Date

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Attachment 2

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington

Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

Summary of Discussion and Commitments/Agreements

1. Approval of Past UMM Minutes

The March 17, 1994 meeting minutes were reviewed and approved.

2. Status Action Items

- 7-14-93:1 Arrange for Ecology to attend radiation survey of 4843 AMSF

Pending. Awaiting removal of waste from 4843 AMSF and scheduling of the survey. An additional waste overpack container needs to be ordered and received before final waste shipments can occur. The survey is now expected to occur toward the end of the 2nd quarter of 1994.

- 7-14-93:2 Provide Ecology with copy of the radiation survey procedure

Pending. Radiation survey documents will be provided once the date of the survey is determined. Copies of the Health Physics Procedures (WHC-IP-0718) and the WHC Radiological Control Manual (WHC-CM-1-6) were provided to Ecology at the December 14, 1993 UMM.

- 2-18-94:1 Arrange and schedule the DQO meeting for 4843 AMSF.

Pending. The DQO meeting will be scheduled after completion of the 4843 AMSF radiation release survey.

- 3-17-94:1 Provide aerial photographs of 4843 AMSF to Ecology.

Pending. Work to collect the aerial photos is continuing.

3. Status Closure Activities

- Radiation Survey Discussion

The marking and mapping that could occur during the radiation survey was discussed by Ecology (A. D. Huckaby), RL (R. N. Krekel) and WHC (J. G. Adler, D. R. Burstad, F. A. Ruck, and J. A. Seamans). Also discussed was the general methodology that would be used in the survey. Significant points of the discussion included the following:

- A short (1 or 2 pages) work package would be written for the survey

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- Action Item 7-17-93:2 covers providing Ecology with a copy of the work package
- Floor stickers and a map could be one of the methods used to identify the locations of any contamination
- This is a routine type of operation
- The survey would probably occur over a period of several days
- That there should be at least a one week notice of when the survey will occur, and
- WHC (J. A. Seamans) took an action item (to be included as part of Action Item 7-17-93:2) to obtain an old copy of a radiation survey to provide to Ecology.
- Ecology is working to include the Washington Department of Health in observing the survey.

**- Status of RL/WHC response to NOD Comments**

Ecology (A. D. Huckaby), RL (R. N. Krekel), and WHC (J. G. Adler, F. A. Ruck, J. A. Seamans) discussed the following issue relative to the RL/WHC response to the NOD Comments:

**- Summary of Past Issue Resolution Workshops**

On March 24, 1994 and March 31, 1994, issue resolution meetings were held by Ecology, RL, and WHC. The purpose of these meetings was to discuss and resolve the open NOD Response Table comments. The meetings were very productive. Resolution was reached on 22 NOD comments with these comments being considered closed (some comments outline specific changes to be made in the next revision of the closure plan). Four comments were consolidated into another comment that dealt with the same subject. This brings the total number of resolved and closed comments to 81 out of a total of 88. Of the remaining 7 comments, 3 are associated directly with the DQO process. The other 4 comments are more general in nature. A handout (Attachment 5) identifies and summarizes the comments addressed during the issue resolution meetings.

**- Status on response to Comment No. 15 (action levels)**

WHC (F. A. Ruck) stated the evaluation of how deleting the term "action levels" from the closure plans had not been completed. A response should be available by the next UMM.

**- Status on response to Comment No. 61 (cost estimates)**

WHC (F. A. Ruck) stated the status of the cost estimates in the site-wide permit has not been established. A response should be available by the next UMM.

**- Status on response to Comment No. 69, 70, 71 (adding material to the administrative record)**

Ecology (A. D. Huckaby), in NOD Comments No. 69, 70, 71, is requesting certain information be entered into the administrative record. WHC (J. G. Adler) is taking the action item (4-14-94:1) to accomplish this. As agreed by Ecology, RL, and WHC, the one action

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item will cover entering the following into the administrative record:

- A copy of the field logbook(s)
- A copy of the analytical results
- A copy of the Professional Engineer's field logbook, and
- A copy of the radiation survey results.

The specifics of the method of transmittal will be addressed at a later date.

**- Response to Ecology's concerns on Annual Dangerous Waste Report Form 5**

At the March 31, 1994 issue resolution meeting, Ecology (A. D. Huckaby) provided RL/WHC with a copy of a Form 5 (page 814 of Vol. 3) from Hanford Site 1992 Annual Dangerous Waste Report (Attachment 6). This page identifies a container (drum) of organic solvents as being associated with the 4843 AMSF.

RL (R.N. Krekel) and WHC (J. G. Adler and J. A. Seamans) reported on the informal investigation to this discrepancy. The Uniform Hazardous Waste Manifest (manifest) and Hazardous Waste Disposal Analysis Record (HWDAR) were located for this drum (Attachment 7). The manifest indicates that the waste organics were originally generated at the 427 Building (the process area of the Fuels and Materials Examination Facility), held at 4831 Building (the FFTF less-than-90-day storage pad), and then shipped to 616 Nonradioactive Dangerous Waste Storage Facility.

The data sources for the Form 5 were also identified. The information flow is from the manifest and HWDAR (and possibly other data sources) into the Solid Waste Information Tracking System (SWITS) data base via manual data entry. The Form 5 is then generated from some, but not all, of the data fields in SWITS.

In a comparison of the manifest and HWDAR with the SWITS data base, it was found that all data (manifest number, drum number, weight, shipping dates, chemical constituent, etc.) except for the building number were identical. In discussions with the SWITS administrator, it was determined that there had been either data entry error in to SWITS or error in a different source document. Therefore, the association of the drum of organic waste with the 4843 AMSF in SWITS and in the Form 5 is incorrect. The 4843 AMSF has never shipped or received drums of organic waste during its history as a regulated dangerous waste storage facility.

Additional information supporting this conclusion includes no entries in 4843 AMSF logbooks indicating any organic waste was received at or shipped from the 4843 AMSF at any time and no reports on 'orphan drums' being found at 4843 AMSF. Also the personnel involved in the direct management and inspections of the 4843 AMSF unconditionally state that no drums of organic waste have ever been associated with the building.

Corrective action was taken based on the conclusion that the association between the waste drum and the 4843 AMSF was basically a

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typographical error. The SWITS data base was changed to indicate that the 4831 Building was facility associated with the waste (this is consistent with the standard practice for this data field). Also, WHC Regulatory Reporting was informed of the error.

In Summary, a Form 5 (page 814 of Vol. 3) from the 1992 Annual Dangerous Waste Report shows a drum of organic waste as being associated with the 4843 AMSF. Examination of the manifest and waste analysis identify this drum as coming from the 427 Building via the 4831 Building (less-than-90-day storage pad). It was determined that incorrect data was entered into the data base that is used to generate the Form 5. The conclusion is that the organic waste on the Form 5 (page 814 of Vol. 3) is associated with the 427 Building and 4831 Building and is not associated with the 4843 AMSF. Corrective actions have been taken.

#### 4. New Business

##### - Ecology clarification to NOD Comment No. 2, Ecology Comment #3

Ecology (A. D. Huckaby) stated that the Ecology response to NOD Comment No. 2, Ecology Comment #3 need additional clarification since it could be possible to misinterpret Ecology's position. Specifically, Ecology is not concurring with information presented in the RL/WHC Response #2. (RL/WHC Response #2 argues that Ecology does not have jurisdiction to regulate radionuclides.) Instead, Ecology concurs with the arguments as they were presented. Also, as stated in Ecology Comment #3, that if the deficiencies are addressed as agreed to other comments, then NOD Comment No. 2 can be considered closed.

RL (R. N. Krekel) and WHC (J. G. Adler and F. A. Ruck) state that they understood the clarification. Ecology, RL, and WHC agreed that the general issue on Ecology's regulatory authority over radionuclides is still disputed by RL and WHC. Also, Ecology, RL, and WHC agreed that the compromises reached on the specific NOD comments relating to radionuclides have been resolved to each party's satisfaction.

NOD Comment No. 2, Ecology Response #3 will be shown as having been closed per this UMM and the following text will be added to Ecology's Response:

"CLARIFICATION PER UMM OF APRIL 14, 1994: Ecology is concurring to the general RL/WHC approach to dealing with radionuclides. Ecology and RL/WHC have agreed to leave the issue of authority for regulating radionuclides as unresolved. For the purposes of this closure plan, Ecology and RL/WHC agree that all other comments addressing radiological issues have been addressed to each party's satisfaction. Therefore, Ecology and RL/WHC agree that this comment can be closed."

#### 5. Set Next Meeting Date

The next meeting has been set for May 17, 1994, for 2:30 pm in Richland, Washington.

4481-4226-116  
9/17/94-1344



Attachment 4

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington

Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

Action Items

<u>Action Item #</u>		<u>Description</u>
07-14-93:1	OPEN	Arrange for Ecology to attend radiation survey of 4843 AMSF. (WHC: J. G. Adler)
07-14-93:2	OPEN UPDATED	Provide Ecology with copy of the radiation survey procedure. Current commitment is for a copy of an old radiation survey report. (WHC: J. G. Adler)
02-18-94:1	OPEN	Arrange and schedule the DQO meeting the 4843 AMSF. (WHC: J. G. Adler)
03-17-94:1	OPEN	Provide aerial photographs of the 4843 AMSF to Ecology. (WHC: J. G. Adler)
04-14-93:1	NEW	Add the following to the Administrative Record: Field logbook(s); analytical results; PE's logbook; and the radiation survey results. (WHC: J. G. Adler)

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Attachment 5

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington

Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

TITLE - NOD RESPONSE TABLE SUMMARY OF OPEN COMMENT STATUS, APRIL 13, 1994

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NOD RESPONSE TABLE SUMMARY OF OPEN COMMENT STATUS  
APRIL 13, 1994

Comments closed at the Issue Resolution Meetings of March 24, 1994 and March 31, 1994:

4, 5, 9, 12, 22, 27, 32, 35, 51, 52, 59, 62, 64, 65, 69, 70, 71, 75, 80, 81, 83, 85

The following comments have been closed and consolidated as agreed during the Issue Resolution Meeting of March 24, 1994:

<u>OPEN COMMENT</u>	<u>COMMENTS CLOSED AND CONSOLIDATED WITH THE OPEN COMMENT</u>
28	86
81	84
39	63 and 67

Comments still open (related to DQO process):

26 (DQO - TCLP)  
28 (DQO - Insulation)  
31 (DQO - Number of samples)

Comments still open:

1 (General comment)  
15 (Action levels)  
39 (level of detail in closure plan)  
61 (Cost estimates)

9/17/94 1348

Attachment 6

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington

Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

~~TITLE -- FORM 5, PAGE 814 OF VOLUME 3 OF  
THE 1992 ANNUAL DANGEROUS WASTE REPORT~~

6451 1738 116

FORM 5

1992 WASTE MANAGEMENT FACILITY ANNUAL DANGEROUS WASTE REPORT

1992

FORM 5

13. YOUR EPA/STATE HAZARDOUS WASTE IDENTIFICATION NUMBER

WA7890008967

14. GENERATOR'S EPA/STATE I.D. NUMBER

I.D. NUMBER:

WA7890008967

NAME: US DEPARTMENT OF ENERGY - HANFORD SITE

ADDRESS: 2400 STEVENS DRIVE

CITY: RICHLAND

STATE: WA

ZIP: 99352-1727

15. WASTE IDENTIFICATION		B.	C.	D.	E.	F.	G.	H.	I.	J.
L	A.	Date	S	Physical	Chemical	Waste Description	Handling Method and Containment Vessel	Dangerous Waste Numbers	Waste Designation D=DW E=EHW	Weight of Waste
J	Manifest Document Number	Shipment Received (MM DD YY)	t	State S=Solid L=Liquid G=Sludge M=Compressed Gas	Nature O=Organic I=Inorganic					
M	See Page 7	See page 8	u	See Page 8	See Page 8	See Page 9	See Page 10	See Page 12	See P. 12	See Page 12
E			P. 8							
1		D12092		L	O	ACETONE 20X, BIS(2-ETHYLHEXYL)PHTHALATE .048X, ETHYL BENZENE 1.6X, METHYL ETHYL KETONE 7X, METHYL ISOBUTYL KETONE 1.4X, PHENOL .028X, TOLUENE 8.9X, XYLENE 5X	S01C	F005 D001 D035 W002 W102	E	176

16. COMMENTS (Enter information by section and/or line number--see instructions).

FACILITY: 4843

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Attachment 7

Unit Managers Meeting  
4843 ALKALI METAL STORAGE FACILITY  
2440 STEVENS CENTER, RM 1600  
Richland, Washington

Meeting Held April 14, 1994  
From 10:00 am to 12:00 noon

TITLE - UNIFORM HAZARDOUS WASTE MANIFEST  
AND  
HAZARDOUS WASTE DISPOSAL ANALYSIS RECORD  
FOR THE ORGANIC WASTE DRUM

151-4226-16

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 3-92

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. WA 7 8 9 0 0 0 8 9 6 7				Manifest Document No. 2 0 0 3 0		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address DEPARTMENT OF ENERGY, RICHLAND OPERATIONS, 4831/400/(427) P.O. BOX 550, 2355 STEVENS DR., RICHLAND, WA 99352								A. State Manifest Document Number					
4. Generator's Phone (509) 376-2674 att: R.A. RIGGERS N2-04								B. State Generator's ID					
5. Transporter 1 Company Name WEST INGHOUSE TRANSPORTATION				6. US EPA ID Number WA 7 8 9 0 0 0 8 9 6 7				C. State Transporter's ID					
7. Transporter 2 Company Name NONE				8. US EPA ID Number N/A				D. Transporter's Phone (509) 376-0971					
9. Designated Facility Name and Site Address 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY/616 BUILDING/600 AREA Att: J.W. PRATT T4-01				10. US EPA ID Number WA 7 8 9 0 0 0 8 9 6 7				E. State Transporter's ID					
								F. Transporter's Phone					
								G. State Facility's ID					
								H. Facility's Phone (509) 373-5013					
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit W/Vol		15. Waste No.	
a. X Waste Paint Related Material Flammable Liquid UN 1263 (Flashpoint 77 F.)						1   D   M		176		K		WTO 2, FOO 5 WCO 2, COO 1 DO 35	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above Item 11a. D.#. 400-90-0015 (1) DOT 17E 55 Gallon Drum.								K. Handling Codes for Wastes Listed Above 11a. Store in Cell 18. <i>UNINSPECTED ①</i> <i>Ed. R. Smith 1-16-92</i> <i>Surveyed 9-30-92</i> <i>Surveyed 9100136</i>					
15. Special Handling Instructions and Additional Information RETURN TO GENERATOR IF NOT DELIVERED  EMERGENCY CONTACT No (509) 373-3800													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment: OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Robert A. Riggers						Signature <i>Robert A. Riggers</i>			Month Day Year 10/1/92				
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name <i>KA Artz</i>						Signature <i>Kenn A. Artz</i>			Month Day Year 10/1/92				
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name NONE						Signature			Month Day Year				
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name <i>PATRICIA L OWENS</i>						Signature <i>Patricia A Owens</i>			Month Day Year 10/2/92				

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Hazardous Waste Disposal Analysis Record (HWDAR)

ISSUE DATE JAN 15 1992

Page 1 of 2

DISPOSAL ANALYSIS No. 20030

Gen. Log No. C-400-90-051

GENERATOR R. A. Riggers

MSIN N2-04

PHONE 6-2674

COMPANY WHC

ACCUMULATION DATE October 24, 1991

SHIPPING DEADLINE DATE January 21, 1992

Analysis: Debi Tureman  
Debra S. Tureman

Phone: 376-4646

Review: Shirley Cozart 1/15/92

Approval: [Signature]

GENERAL INSTRUCTIONS

- Package, Label, and Mark according to the Shipping Summary Table (attached).
- All shipping containers must be in good condition and tightly closed.
- Container gross weight should be 450 pounds or less whenever possible.
- Complete a Uniform Hazardous Waste Manifest for shipments of regulated waste.
- All regulated waste must be inspected by Transportation Logistics (376-7627)
- Obtain radiological release or exemption within 24 hours before transport.
- Arrange for transport at least one week ahead of time.

SEE WHC-CM-5-16 AND WHC-CM-2-14 FOR DETAILS OF PACKAGING AND SHIPPING

<u>Waste Destination</u>	<u>Transportation Rep.</u>	<u>Phone Number</u>
<u>X</u> 616 Nonradioactive Waste Storage	R. Pedraza	373-1881
<u>  </u> 212-P PCB Storage 200 North	P. C. Hendrix	376-0971
<u>  </u> Non-regulated Drum Storage	P. C. Hendrix	376-0971
<u>  </u> Solid Waste Landfill Trash Trench	P. C. Hendrix	376-0971
<u>  </u> Other:		

cc: Solid Waste Engineering Analysis, others as needed:

M. A. Sams	G2-03	D. L. Barron	S2-62
J. W. Pratt	T4-01	M. R. Romsos	N3-11
R. Pedraza	T3-28	Solid Waste Landfill operator	G4-07

917 3224-1353

WASTE SHIPPING SUMMARY

MANIFEST #: 20030  
ITEM NUMBER: 400-90--0015 SHIPPING NAME: Waste paint related material  
WASTE CONTENT: 1.6% ethyl benzene, 1.4% methyl isobutyl ketone, 8.9% toluene, 0.028% phenol, 0.048% bis(2-ethylhexyl)phthalate, 5% xylene, 20% acetone, 7% methyl ethyl ketone, 0.012% di-n-butylphthalate, 0.011% naphthalene, 57% pigments and film formers not specified in the lab analysis (land ban: F005, D001) Flashpoint: 77°F  
HAZARD CLASS: Flammable Liquid  
DOT ID NO: UN1263  
DOT LABEL: Hazardous Waste, Flammable Liquid  
PACKAGING: package according to 49 CFR 173.128  
QUANTITY: (1) 55 gallon DOT 17E DM weighing 176K  
WASTE NUMBERS: WT02, F005, WC02, D001, D035 (EHW)  
SHIP TO: 616 Building

CELL: 1B

947324.1359

-----Distribution:

J. G. Adler	WHC	H6-23
J. K. Bartz	GSSC	B1-42
R. M. Carosino	RL	A4-52
D. L. Duncan	EPA	HW-106 (Seattle)
O. A. Farabee	RL	N1-39
R. G. Hastings	RL	N1-39
A. D. Huckaby	Ecology	B5-18
R. N. Krekel	RL	A5-15
P. J. Mackey	WHC	B3-15
S. M. Price	WHC	H6-23
F. A. Ruck III	WHC	H6-23
J. A. Seamans	WHC	N2-04
S. A. Szendre	WHC	H6-30
J. L. Waite	WHC	B2-35
RCRA file/GHL	WHC	H6-23
Field File Custodian	WHC	H6-08

ADMINISTRATIVE RECORD: 4843 ALKALI METAL STORAGE FACILITY (S-4-1) [Care of EPIC, 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, Record Center, Mail Stop HW-074

Please send comments on distribution list to Kari R. Schmildi (H6-23), (509) 373-2083.

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