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## Meeting Minutes Transmittal

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY  
Unit Managers Meeting  
2440 Stevens Center Place, Room 1600  
Richland, Washington

January 31, 1994  
2:00 p.m. - 4:00 p.m.

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

Clifford E. Clark Date: \_\_\_\_\_  
Clifford E. Clark, Unit Manager, RL  
(Represented by Roger C. Bowman, WHC)

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

Alisa D. Huckaby Date: 3-15-94  
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

224-T Transuranic Waste Storage and Assay Facility, WHC Concurrence

Richard D. Pierce Date: 3-15-94  
Richard D. Pierce, 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 - January 5, 1994 Teleconference Meeting Minutes



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Attachment 1

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY  
Unit Managers Meeting  
2440 Stevens Center Place, Room 1600  
Richland, Washington

January 31, 1994  
2:00 p.m. - 4:00 p.m.

Agenda

1. MEETING MINUTES
2. STATUS OF PERMIT APPLICATION
3. STATUS OF RESPONSE TO COMPLIANCE LETTER RECEIVED FROM MS. L. RUSSELL
4. ACTION ITEMS
  - PART A PERMIT APPLICATION DISCREPANCIES
5. GENERAL DISCUSSION
6. SET NEXT MEETING DATE

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Attachment 2

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY  
Unit Managers Meeting  
2440 Stevens Center Place, Room 1600  
Richland, Washington

January 31, 1994  
2:00 p.m. - 4:00 p.m.

Summary of Discussion and Commitments/Agreements

1. MEETING MINUTES

The December 16, 1993 Unit Manager Meeting minutes were approved and signed.

The minutes from the teleconference meeting held January 5, 1994 were approved (Attachment 5). The minutes were signed by Mr. D. Saueressig (WHC), and initialed by Ms. A. Huckaby (Ecology), Ms. J. Bartz (MACTEC), Mr. R. Bowman (WHC), and Mr. R. Szelmezcza (WHC).

2. STATUS OF PERMIT APPLICATION

Mr. Saueressig stated that WHC received Ecology's notice of deficiency (NOD) comments regarding the Part B permit application, and that WHC has 120 days from the date the NODs are officially received by RL to submit a response table.

3. STATUS OF RESPONSE TO COMPLIANCE LETTER RECEIVED FROM MS. L. RUSSELL

Mr. Saueressig reported that RL/WHC's response to Ms. L. Russell's (Ecology) compliance letter is in RL for concurrence. Mr. R. Szelmezcza (WHC) noted that Ecology's compliance letter required several actions to be completed within a certain amount of time, and that it is RL/WHC's intent to transmit a response before the first compliance action is due. Ms. Huckaby inquired about the substance of RL/WHC's response letter, and Mr. Szelmezcza explained that the letter contained a response and schedule for each of the compliance issues. Mr. Szelmezcza added that WHC's schedule does not meet with the schedule contained in Ms. Russell's compliance letter because certain actions are contingent on the floor being sealed.

4. ACTION ITEMS

• Part A Permit Application Discrepancies

Ms. Huckaby stated that the Part A permit application discrepancies are addressed in Ecology's NOD comments that have been transmitted to WHC.

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There were no new action items generated from the December 16, 1993 Unit Managers Meeting.

## 5. GENERAL DISCUSSION

Ms. Huckaby initiated a discussion regarding the December 9, 1993 Backlog Waste Stage 2 meeting minutes, and referred to the following statement quoted from the minutes: "Ms. Huckaby of Ecology identified to Roger Szelmeczka of WHC that all backlog containers in TRUSAF must be on spill control pallets. The requirement to place containers on pallets within TRUSAF was discussed in the Part B permit application for newly generated waste. It has been and will be WHC's position to only palletize backlog waste containers when the x-ray results indicates residual liquids within the container."

Ms. Huckaby expressed concern that the above statement was a misinterpretation of comments she made during her inspection of TRUSAF, and indicated that she wanted to clarify the issue. Ms. Huckaby proceeded by stating that TRUSAF is an interim status facility; and according to the Washington Administrative Code (WAC), if the drums contain no free liquids then no secondary containment is required, but the drums must be elevated or the floor must be sloped. If the drums contain free liquid, then secondary containment and sloping floors or elevation is required.

Mr. Szelmeczka asked if the requirements were specific to containers of solids or liquids. Ms. Huckaby responded that her understanding, after a discussion with Ms. Russell, was that the sloping floor would address the issue of drums containing liquids. Mr. Szelmeczka pointed out that one of the purposes of x-ray is to confirm the drum is free of liquids, and if it is determined there is over one percent liquid in the drum the procedure is to palletize the drum. Ms. Huckaby indicated her understanding of the regulations was that they did not quantify a specific amount of liquid present in the drum to require following a certain procedure. Mr. Szelmeczka interpreted Ms. Huckaby's response to indicate that the drums be managed with secondary containment whether they contain liquids or solids. Ms. Huckaby stated that secondary containment and sloping floors are adequate if the drums contain no liquids. Ms. Huckaby added that she had not seen any diagrams to indicate that the floors are sloped, and Mr. Szelmeczka stated that had not been determined. Mr. Szelmeczka noted that the second and third floors had been coated with a sealant, providing secondary containment.

Ms. Huckaby recognized that some confusion may have resulted from referring to interim status requirements and the permit application. Mr. R. Bowman (WHC) stated a preference to defer the issue of secondary containment or elevation of the drums until the regulations could be reviewed.

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Mr. Szelmeczka stated that a new procedure is being initiated at TRUSAF. In the event a drum is discovered to contain free liquid or a suspect article, the drum can either be managed as dangerous waste or it can be returned to the generator. Mr. Szelmeczka added that TRUSAF has not received many noncompliant drums.

**6. SET NEXT MEETING DATE**

The next Unit Managers Meeting was scheduled for either February 15 or 18, 1994.

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Attachment 4

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY

Unit Managers Meeting  
2440 Stevens Center Place, Room 1600  
Richland, Washington

January 31, 1994  
2:00 p.m. - 4:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
11-4-93:1	WHC will provide an overview of the TRU retrieval pilot project at the next Unit Managers Meeting. Action: R. Szelmeczka (WHC)  <b>CLOSED</b>
11-4-93:2	WHC will compare the estimated annual quantities for stored waste with the amounts that have been stored for the past three years, and adjust the estimates in the Part A permit application that need to be increased. Action: J. Williams Jr. (WHC)  <b>CLOSED</b>
11-4-93:3	WHC will provide the letter documenting approval by Ecology and the EPA for the certification form used for the Part A permit application. Action: J. Williams Jr. (WHC)  <b>CLOSED</b>
11-4-93:4	WHC will determine the status per the TPA of the process cells at TRUSAF and provide the information at the Unit Managers Meeting. Action: R. Bowman (WHC)  <b>CLOSED</b>

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Attachment 5

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY  
Unit Managers Meeting  
2440 Stevens Center Place, Room 1600  
Richland, Washington

January 31, 1994  
2:00 p.m. - 4:00 p.m.

JANUARY 5, 1994 TELECONFERENCE MEETING MINUTES

913206 02

## TELEPHONE CONFERENCE MEMORANDUM

Company: Westinghouse Hanford Company Address: PO Box 1970, Richland WA 99352

[ ] INCOMING [X] OUTGOING DATE: January 5, 1994 TIME:  
WITH: Dan Duncan OF: USEPA PHONE: (206) 553-6693

WITH: OF: PHONE:

Copies to:	Name	Address
	Joan Bartz, MACTEC	B1-42
	Roger Bowman, WHC <i>RCB</i>	H6-24
	Barbara Broomfield, WHC	T3-04
	Cliff Clark, RL	A5-15
	Paul Hapke, WHC	T4-05
	Alisa Huckaby, Ecology <i>ADH</i>	B5-18
	Richard Lipinski, WHC	T3-04
	Richard Pierce, WHC	T3-04
	Dan Saueressig, WHC	H6-24
	Roger Szelmezcza, WHC <i>Rut</i>	T4-06

Subject: 224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY DANGEROUS WASTE PART B PERMIT APPLICATION

RCRA Unit Permits

Department

*D. Saueressig 1/5/94*  
D. G. Saueressig

376-9739

Telephone #

Summary of Conference

Ms. Huckaby stated that the Notice of Deficiency (NOD) that RL and WHC are expecting in January 1994 for the 224-T Transuranic Waste Storage and Assay Facility (TRUSAF) Dangerous Waste Part B Permit Application (Part B) will be both general and specific. One of the major topics discussed was the inclusion of the process cells in the Part B. The survey and text in the Part B specifically exclude the process cells, although the figures in the Part A permit application, as well as Chapters 2.0 and 4.0 of the Part B show the process cells. It was agreed that if active storage of dangerous waste was occurring in the process cells, that the process cells would be included in the Part B. Chapter 11.0 of the permit application stated that TRUSAF will be closed with operable unit 200-TP-4, although operable unit 200-TP-4, as defined by the Tri-Party Agreement, does not address the process cells connected to TRUSAF. Mr. Pierce stated that the process cells have never been used as a RCRA storage unit, that the cells may contain some residual product that could be considered waste. It was agreed by all that if RCRA regulated waste is being stored in the process cells, that they will be closed in a RCRA fashion. Our response to the deficiency will be to close the process cells safely with regards to human health and the environment when the building is closed.

Another topic that was discussed was the use of the x-ray machine. Ms. Huckaby questioned what happens if the x-ray machine showed that the process knowledge used in designating a container was incomplete or possibly incorrect. Ms. Huckaby's concern was that a transuranic only drum may contain some mixed waste, and she could not find in the Part B how we address discrepancies if problems arise. Mr. Pierce stated that the x-ray is only a screening tool, not a designation tool. Mr. Clark stated that some activities taking

place at TRUSAF are not RCRA regulated, and that Ms. Huckaby may have witnessed a non-RCRA regulated activity during one of her visits. It was agreed that the Part B could be revised to address transuranic containers to the extent that if there are discrepancies in designation, that the waste would be handled in a RCRA fashion until verification could be performed. Mr. Pierce stated that he would try to get Ms. Huckaby into a designation class.

Ms. Huckaby suggested delaying the next Unit Managers' Meeting (UMM) until we have a chance to receive and digest the NOD. Mr. Clark requested that we hold the UMM anyway just to see where Ms. Huckaby is at. Ms. Huckaby stated that the permit application is old, and when it is updated, only certain sections of the permit application will be enforced. She suggested that we supply enforceable permit conditions. Mr. Clark agreed. It was agreed to make an action to put something together in the near term to deal with issues, such as the process cells and our understanding of where they fit in the closure of TRUSAF. It was agreed that Mr. Pierce will pull together some information about the process cells for the January 27, 1994 UMM.

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Distribution:

M. R. Aichele	WHC	T4-04
B. A. Austin	WHC	B2-35
J. K. Bartz	MACTEC	B1-42
R. C. Bowman	WHC	H6-24
B. J. Broomfield	WHC	T3-04
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
D. L. Duncan	EPA	HW-106
T. L. Erickson	WHC	N3-13
R. M. Gordon	RL	R3-80
K. L. Hladek	WHC	N3-13
A. D. Huckaby	Ecology	BS-18
M. N. Jaraysi	Ecology	BS-18
M. J. La Barge	WHC	H6-30
S. J. Lijek	MACTEC	B1-42
D. W. Lloyd	MACTEC	B1-42
P. J. Mackey	WHC	B3-15
M. M. McCarthy	WHC	N3-13
K. M. McDonald	WHC	T4-03
R. D. Pierce	WHC	T3-04
D. B. Powell	WHC	T4-03
S. M. Price	WHC	H6-23
R. J. Roberts	WHC	N3-13
D. G. Saueressig	WHC	H6-24
N. M. Shoemaker	WHC	T4-04
R. W. Szelmezcza	WHC	T4-06
S. A. Szendre	WHC	H6-30
H. T. Tilden II	PNL	P7-68

ADMINISTRATIVE RECORD: 224-T Transuranic Waste Storage and Assay Facility,  
S-2-2 [Care of EPIC, WHC (H6-08)]

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Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail  
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Please send comments on distribution list to K. E. Knox, WHC H6-24,  
(509) 372-3596