

START

0030206

MEETING MINUTES

Subject: Expedited Response Action Weekly Interface

TO: Distribution

BUILDING: 740 Stevens Center

FROM: W. L. Johnson

CHAIRMAN: G. C. Henckel *GCH*

Dept-Operation-Component	Area	Shift	Meeting Dates	Number Attending
Environmental Engineering	RCHN	Day	August 9, 1993	16

Distribution

State of Washington Department of Ecology

J. Donnelly
 L. Goldstein
 D. Goswami*
 R. L. Hibbard
 J. Phillips
 D. D. Teel
 N. Uziemblo
 J. Yokel
 T. Wooley

U.S. Army Corps of Engineers

Walter Perro* A3-61
 Mike Mahoney* A3-61

U.S. Department of Energy

H. L. Chapman A5-19
 J. K. Erickson A5-19
 B. L. Foley A5-19
 E. D. Goller A5-19
 R. G. McLeod A5-19
 D. E. Olson* A5-19
 P. M. Pak* A5-19
 R. K. Stewart A5-19

Ebasco

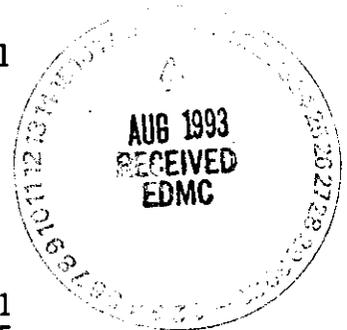
R. L. Cameron*

U.S. Environmental Protection Agency

P. R. Beaver* B5-01
 D. R. Einan
 D. A. Faulk*
 L. E. Gadbois
 P. S. Innis*
 D. R. Sherwood*

Westinghouse Hanford Company

M. L. Adams H6-01
 L. D. Arnold B2-35
 M. V. Berriochoa B3-30
 S. L. Bradley G1-20
 H. D. Downey H6-27
 M. C. Hagood* H6-04
 W. F. Heine B3-63
 G. C. Henckel H6-04
 W. L. Johnson* H6-04
 J. K. Patterson H6-27
 V. J. Rohay* H6-06
 T. M. Wintczak H6-27
 R. D. Wojtasek* H6-27
 EPIC H6-08
 ERAG Route H6-04
 GCH File



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===== *Attendees

The weekly interface meetings on the expedited response actions (ERAs) was held to status the ERAs for the U.S. Department of Energy, Richland Operations Office, the U.S. Environmental Protection Agency, and the State of Washington Department of Ecology. The meeting was conducted in accordance with the attached agenda.

Distribution
Page 2
August 9, 1993

Special emphasis was placed on the process to re-start the carbon tetrachloride vapor extraction systems. The EPA provided a copy of comments from the Yakima Indian Nations on the White Bluffs Pickling Acid Crib Proposal.

Attachments:

1. Agenda
2. Action Item List
3. Decisions, Agreements & Commitments
4. Expedited Response Action Weekly Reports, week ending 08/06/93
5. Yakima Indian Nation's Comments on the White Bluff Pickling Acid Crib Proposal

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WEEKLY ERA INTERFACE AGENDA

SUBJECT: STATUS OF THE EXPEDITED RESPONSE ACTIONS

DATE: August 9, 1993

- GENERAL ISSUES
 - ERA Interface Action Item Review
- INDIVIDUAL PROJECT STATUS
 - Riverland
 - o Status of Field Activities
 - Sodium Dichromate
 - o Waste Disposal
 - Pickling Acid Crib
 - o ERA Proposal out for Public Review
 - N-Springs
 - o Proposal Status
 - North Slope
 - o Revising Proposal
 - 200-W Carbon Tetrachloride
 - o Operational Readiness Issues
 - 618-11
 - o Draft Proposal Status
- OTHER ISSUES
- SUMMARY OF ACTION ITEMS
- SIGN-OFF ON ANY DECISIONS, AGREEMENTS, OR COMMITMENTS

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EXPEDITED RESPONSE ACTION INTERFACE MEETING

-ACTION ITEMS-
August 9, 1993

ORGANIZATION

ACTION ITEM

WHC

Provide copy summary analysis report and ten-day report. (open)

RL

Provide a briefing on N-Springs. (open)

RL

Clarify North Slope document distribution. Ecology is receiving telephone calls and written comments prior to public review. (open)

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EXPEDITED RESPONSE ACTION INTERFACE MEETING

-DECISIONS, AGREEMENTS, & COMMITMENTS-
August 9, 1993

DECISIONS:

AGREEMENTS:

No significant items

COMMITMENTS:

RL Representative

EPA Representative

Ecology Representative

[Signature] 8/9/93

WHC Representative

93150241070

Weekly Report, Period Ending August 6, 1993
EXPEDITED RESPONSE ACTIONS
Technical and Management Contact - Wayne L. Johnson, 376-1721
Environmental Division

-REVISED-

North Slope Expedited Response Action - Completed dispositioning DOE, EPA, Ecology and U.S. Fish and Wildlife comments on the draft ERA Proposal. The comments are being incorporated into the document.

N-Springs Expedited Response Action - The ERA Proposal is being finalized for transmittal to RL.

White Bluffs Pickling Acid Crib Expedited Response Action - The public comment period will continue until August 9, 1993.

618-11 Burial Ground Expedited Response Action - The proposal is being revised based on DOE Review Team comments generated during the week.

Environmental Monitoring - Field sampling scheduled this week, (surface soil and vegetation), at 618-10 & 618-11.

BWID - The Buried Waste Integrated Demonstration hosted a technology exhibition and equipment display July 29-30 in Idaho Falls. Topics included characterization, geophysical surveys, excavation techniques, contamination control, TRU monitoring, and thermal treatment technologies.

Sodium Dichromate Expedited Response Action - At the Sodium Dichromate site three hazardous waste drums were shipped Monday (8-2-93) to 616 Building for offsite disposal. The remaining two drums are scheduled to be shipped to the Solid Waste Landfill this Friday (8-6-93).

Riverland Expedited Response Action - Collected Riverland Pesticide site soil samples for offsite lab analyze. Field screening indicated that the site had only trace amounts of aldrin in the soil and should be considered clean.

The SRM soil-gas team supported the Riverland ERA last week by field-screening several concrete and soil samples for volatile organic compounds (VOC). The samples were collected and analyzed at the Riverland site on July 22, 1993. The results indicate the concrete in the 6718 Building maintenance pits contains traces of VOC associated with diesel fuel. These compounds include ethylbenzene and the three isomers of xylene. The concrete samples also contained traces of solvents including acetone, hexone, and perchloroethylene. Soils collected under the concrete and from a nearby drainage ditch contained minute quantities of the same materials. The major contaminant in the concrete and soils is petroleum hydrocarbon residue. This residue was probably deposited from diesel fuel used as a solvent at the facility. A brief summary report is being prepared for this field screening support.

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200 West Area Carbon Tetrachloride Expedited Response Action

A. CCl₄ ERA - A. Vapor Extraction System (VES) Operations

Status of Operations: All three vapor extraction systems at the 200 West Area carbon tetrachloride ERA have been shut down as a result of the overheating of the primary granular activated carbon (GAC) canister at the 1500 cfm unit that occurred on June 3, 1993.

Anticipated Restart: A draft letter, Justification for Continued Operation at 216-Z-1A/Z-18, which outlines the restart strategy, should be signed by August 5, 1993. Contingent upon approval of the letter, and completion of activities identified in the readiness checklist, restart of the 1,000 cfm VES at the Z-1A/Z-18 ERA site is scheduled to begin by August 31, 1993. Restart of operations at Z-9 is anticipated by the end of September.

Restart Actions Completed: The complete restart strategy, with status as of August 4, 1993 is attached. Major actions completed since June 3, 1993 include:

- 24-hour initial Off Normal Occurrence Report submitted 6/4/93.
- occurrence entered into Quality, Environmental, Safety Tracking (QUEST) database 6/15/93.
- 10-day Off Normal Occurrence Report submitted 6/17/93.
- 10-day Off Normal Occurrence Report Update submitted 7/17/93.
- Initial Background Summary Report completed 6/14/93.
- Revised Background Summary Report completed 7/2/93 includes Occurrence Report; Hanford Fire Dept. Report; General Specifications and Properties of GAC; VES Operational Data; Notes of Discussions with GAC vendors and experts, with Savannah River personnel, and with EPA contact.
- Initial References Report completed 7/12/93.
- Initial Heat Balance Scenario completed 6/18/93.
- Revised Heat Balance Scenario completed 6/30/93.
- Initial Phosgene Analysis completed 7/7/93.
- GAC sampling completed 6/27/93.
- GAC water sampling completed 6/27/93.
- GAC water analysis completed 7/21/93.
- GAC analysis by Envirotrol completed 7/2/93.
- GAC inorganic analysis completed 7/22/93.
- Initial Summary Analysis Report completed 6/18/93.
- Updated Initial Summary Analysis Report completed 6/24/93.
- Revised Summary Analysis Report completed 7/22/93 includes the heat transfer calculations, consequence and accident scenarios, shutdown analysis, phosgene analysis, and GAC canister and well analyses.
- Priority Planning Grid (PPG) risk value determined 6/12/93.
- Root cause analysis interviews completed 6/28/93.
- Root Cause analysis final report completed 7/20/93.
- Unreviewed Safety Question evaluation completed 6/16/93.
- Hazards evaluation completed 6/24/93.

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- Basis for Justification for Continued Operation at Z-1A/Z-18 determined 7/6/93.
- Presentation to WHC Level 2 Management completed 7/16/93.
- Readiness Checklist developed 7/30/93.
- Initial GAC thermocouple testing completed 6/28/93.
- Followup GAC thermocouple testing completed 7/23/93.
- Site visit and presentation by GAC expert 7/26-30/93.

Activities Planned for Next Week: A test to measure GAC ignition temperature, ignition by-products, and heat of adsorption is being conducted by the Plutonium Process Support Laboratory. The test involves thermogravimetric/calorimetric testing of virgin GAC and GAC loaded with carbon tetrachloride and is expected to be completed August 6, 1993. Pilot scale GAC adsorption testing to monitor temperatures and concentrations in a 4-5 ft GAC bed is being conducted by ERA project staff at WSU. This information will help determine reasonable operating limits for the GAC canisters.

Summary of GAC Expert Recommendations: A site visit by an internationally recognized GAC expert, Dr. Murty Hari, President of Superior Adsorbents, Inc., took place July 26 through 30, 1993. Dr. Hari visited the carbon tetrachloride site and participated in extensive technical discussions with ERA project staff. On July 30, Dr. Hari presented a summary of his observations and recommendations regarding the GAC overheating incident.

Dr. Hari presented statistics on incidents involving fires and overheating of GAC units. These statistics indicate that both incidents of fire and of overheating are rare. In the documented incidents, oxidizable substances were present. Based on conditions of our incident and the available statistics, Dr. Hari believes that carbon tetrachloride alone could not have generated the heat required to scorch the paint. He believes that the GAC did not combust.

Several recommendations regarding engineering controls were made by Dr. Hari. He believes that safe limits for operations would be 1000 ppm maximum at 500 scfm and a maximum of 20°F rise from inlet to outlet temperature of the GAC flow stream. The values are very conservative based on his experience. Also, he highly recommended testing the soil gas for the presence of oxidizable substances at frequent intervals.

At the suggestion of Dr. Hari, a test was conducted to determine if a low pH could be produced in a GAC bed at higher temperatures with carbon tetrachloride present. The results showed that at a GAC bed temperature of 177°C, the extracted pH of the GAC was 2.5. This result shows that the conditions of the overheating incident most likely led to the formation of acid.

Dr. Hari said that simulated GAC canister testing would be very useful for setting realistic limits on our VES operation. These tests (being conducted by ERA staff at Washington State University laboratory August 4 to 6, 1993) will define the concentration limits of carbon tetrachloride based on internal heating of the GAC canister; will define the carbon monoxide concentrations at which combustion of GAC is occurring; will define the effect of residual and flow stream water content; and will study the effects of oxidizable substances.

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Site Cleanup Plan - In response to a routine housekeeping inspection conducted on July 28, 1993, a site cleanup plan was developed this past week to implement cleanup of both the Z-1A and Z-9 ERA sites. A Letter of Instruction (LOI) has gone out to KEH to provide labor and equipment to support cleanup around the vapor extraction systems at each site. Another LOI is being prepared to KEH to provide fenced laydown areas at each site to store GAC canisters and miscellaneous on-hand materials.

Permanent Power Installation at Z-9 - Permanent power installation at the Z-9 site is progressing very well and is expected to be complete by August 6, 1993. The two leased diesel generators were returned to the vendor Wednesday, August 4, 1993.

VES Operations Procedure Development - Based on recommendations from the root cause analysis report following the GAC overheating incident the ERA project team is in the process of developing more clearly defined operating procedures for VES operations. The procedures are being developed in accordance with WHC-CM-3-5 Document Control and Records Management, Section 12.5 - "Working Level Procedure Control." The procedures are currently being drafted from operating information contained within the ERA design document WHC-SD-EN-TI-010, "Design, Operation, and Monitoring of the Vapor Extraction System at the 216-Z-1A Tile Field." This is expected to be a two to three week process before the procedures are ready to implement restart of 1000 cfm VES at the 216-Z-1A site.

B. Well Field Design

Baseline Monitoring

Monitoring on July 30, 1993 during a period of high pressure (29.4 in of Hg) produced few VOC detections. Monitoring in the main soil-gas network (excluding new Z-1A CPT field) revealed 4 detections (maximum 501 ppm at SG 15-6). There were three wellhead detections with the maximum being 43 ppm at 299-W15-95.

On August 3, 1993 during a period of moderate barometric pressure (29.1 in of Hg) there were many VOC detections with 12 VOC detections at soil-gas probes (maximum 393 ppm at SG 15-6). There were 21 wellhead detections with the maximum being 335 ppm at 299-W15-218.

Wellfield Design

Drilling of vapor extraction well 299-W15-220 east of 216-Z-9 began June 2, 1993 and reached total depth July 21, 1993. This well will be completed after 299-W18-252.

Drilling of vapor extraction well 299-W18-252, midway between 216-Z-1A and 216-Z-12, began May 3, 1993. Completion began on July 20, 1993 and is expected to be finished August 6, 1993. The completed well will have two screened intervals.

The tentative schedule for sonic drilling at the carbon tetrachloride site is: August 16 through September 7, 1993, drill one angled vapor extraction well under the parking lot north of the 216-Z-9 trench; September 20 through

October 5, 1993 and October 6, through October 20, 1993, drill two vertical vapor extraction wells near the 216-Z-9 trench. Measurements of drive barrel sample temperatures will begin August 5, 1993; extensive measurements of split tube sample temperatures will begin the week of August 9, 1993.

Cone penetrometer (CPT) well installation began May 3, 1993 in the vicinity of the three carbon tetrachloride disposal sites by Applied Research Associates (ARA). Field work was completed July 28, 1993. The CPT was used to complete 58 total pushes for a total of 4109 ft during 28 working days at the carbon tetrachloride site. The deepest hole was 119 ft. Sixteen holes were less than 50 ft deep, 33 holes were between 50 to 100 ft, and 8 exceeded 100 ft. The CPT was used to install 94 subsurface monitoring points at a total of 32 locations, and 15 extraction wells.

A draft of the Wellfield Evaluation Report is expected to be completed August 9, 1993.

C. Site Characterization (with VOC-Arid ID)

Soil Gas Surveys

Passive soil gas sampling using Quadrel Service's EMFLUX technology began July 21, 1993. Retrieval of the second group of sample collectors emplaced during a period of predicted maximum soil-gas emissions were completed July 31, 1993. These samples were shipped to Quadrel on August 3, 1993. There were no difficulties during field operations. We are currently awaiting the sample analytical data and report from Quadrel.

Data Evaluation

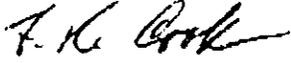
A tentative outline and schedule for the FY 93 site characterization status report was established. This report is due September 30, 1993. The target date for producing the first draft is August 20, 1993.

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Additional detailed comments are contained in Attachment A to this letter.

Sincerely,



F. R. Cook, Technical Analyst
Environmental Restoration/Waste Management Program
Yakima Indian Nation
1933 Jadwin Avenue Suite 110
Richland, WA 99352

ATTACHMENT A: DETAILED COMMENTS TO YIN LETTER OF AUGUST 3, 1993
REGARDING HANFORD PICKLING ACID CRIBS REMEDIATION

- cc: John Wagoner, DOE/RL
- Jim Warner, DOE/EM (fax)
- Thomas Grumbly, DOE/EM
- Mary Riveland, WDOE
- EPA Region 10 Administrator
- K. Clarke, DOE/RL
- Jim Peterson, DOE/RL (5YP)
- R. Jim ER/WM, YIN (fax)
- M. Dick Squeochs, YIN
- Carroll Palmer, YIN
- Mike Bauer, YIN
- C. Sanchey, YIN
- Washington Gov., M. Lowry
- U. S. Congressman, J. Inslee
- U. S. Senator, P. Murray
- Joe Stohr, WA Dept of Ecology
- David Berick
- Michael Campbell

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ATTACHMENT A: DETAILED COMMENTS TO YIN LETTER OF AUGUST 3, 1993 REGARDING HANFORD PICKLING ACID CRIBS SLOPE REMEDIATION

1. Pickling acid levels in the groundwater could be excessive as a result of disposal practices. Each of the cribs should be individually surveyed for acids; and, if any excessive acid is found in the soils, the groundwater should also be surveyed to determine the need for groundwater remediation. Surveys should be designed to assure that there is reasonable assurance that excessive acid does not exist. Groundwater in the area should, in general, be remediated to allow use for domestic purposes or for watering livestock, consistent with Treaty usage rights pertaining to the pasturing of stock.
2. All carcinogenic contaminants if found should be removed from the area or destroyed, including petroleum hydrocarbons and asbestos in order to provide safe access to YIN members exercising usage rights under the Treaty of 1855.
3. A flora and fauna survey should be conducted where ground disturbance will occur. We request that the YIN be notified of these surveys so as to allow YIN participation.
4. Although the Acid Pickling Cribs remediation may not directly affect the salmon spawning on the Columbia, care during remediation activities should be taken to avoid river pollution, and disturbance of the wildlife in the area.

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2. INCIDENT ANALYSIS

Rohay

o gather background information			
- interview lead engineer	6/8/93	Johnson/Dippre	Complete
- review procurement files	6/8/93	Dippre	Complete
- discussions with vendors/consultants	7/2/93	Dippre	Complete
- SRS event			
collect/analyze data	6/11/93	Dippre	Complete
followup with SRS	7/2/93	Dippre	Complete
- review INEL safety analysis	8/13/93	Rohay	
- confer with EPA contact	7/2/93	Cameron	Complete
- hydrocarbon/ketone char. - wells			
sampling	6/14/93	Swett	Complete
inorganic/methane analysis at PNL	6/16/93	Bartley	Complete
organic analysis at HEHF	6/18/93	Bartley	Complete
- hydrocarbon/ketone char. - GACs			
(primary overheated GAC			
secondary GAC behind overheated GAC			
uninvolved saturated GAC)			
Sampling Analysis Form to HASM	6/18/93	Havenor	Complete
Sampling Analysis Form Finalized	6/22/93	Havenor	Complete
Job Hazard Analysis for airdry	6/21/93	Gale	Complete
Air dry GAC	6/26/93	Gale	Complete
Sampling	6/27/93	Gale	Complete
inorganic/methane analysis at PNL	7/22/93	Swett	Complete
organic analysis at HEHF	8/13/93	Cameron	
- obtain fireman's report	6/8/93	Gale	Complete
- provide references report	7/12/93	Dippre	Complete
- provide background summary report			
Rev. 0	6/14/93	Dippre	Complete
Rev. 1	7/9/93	Dippre	Complete
o analyze cause of occurrence			
- heat balance scenarios			
Rev. 0	6/18/93	Dengler	Complete
Rev. 0 update	6/25/93	Dengler	Complete
Rev. 1	6/30/93	Dengler	Complete
Rev. 2	8/6/93	Dengler	
- phosgene analysis			
Rev. 0	7/7/93	Prinzing	Complete
Rev. 1	TBD	Prinzing	
- thermogravimetric/calorimetric analysis	8/6/93	Peters	
- GAC ignition tests (WSU)	8/13/93	Cameron	
- Consult with GAC expert Dr. Hari Murty			
onsite visit by Dr. Murty	7/26-30/93	Cameron	Complete
presentation by Dr. Murty	7/30/93	Cameron	Complete
- GAC physical and chemical props.			
primary GAC center and margin samples			
Sampling Analysis Form to HASM	6/18/93	Havenor	Complete
Sampling Analysis Form Finalized	6/22/93	Havenor	Complete
Job Hazard Analysis for airdry	6/21/93	Gale	Complete
Air dry GAC	6/26/93	Gale	Complete
Sampling	6/27/93	Gale	Complete

**200 WEST AREA CCL4 VAPOR EXTRACTION ERA
RESTART STRATEGY
Rev. 8/4/93**

STATUS OF OPERATIONS

All three vapor extraction systems have been locked and tagged to prevent operations until the approval to proceed is received through the restart process.

During the restart process the VES systems will be temporarily operated on ambient air to perform limited testing of the units and facilitate waste handling of the impacted GAC canister. During this time there will be no extraction of carbon tetrachloride from the wellfield.

<u>ACTION</u>	<u>TARGET DATE</u>	<u>ASSIGNEE</u>	<u>STATUS</u>
1. OFF NORMAL OCCURRENCE REPORTING		Hagood	
o 24-hour initial occurrence	6/4/93	Hagood	Complete
o QUEST database entry	6/15/93	Hagood	Complete
o 10-day report	6/17/93	Hagood	Complete
o 10-day update	7/17/93	Hagood	Complete
o Final occurrence reporting	8/13/93	Hagood	

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	inorganic/methane analysis at PNL	7/22/93	Swett	Complete
	organic analysis at HEHF	8/13/93	Cameron	
- GAC	analysis at Envirotrol			
	sample received at Envirotrol	6/29/93	Gale	Complete
	analysis by Envirotrol	7/2/93	Dippre	Complete
- GAC	water analysis			
	Sampling Analysis Form to HASM	6/18/93	Havenor	Complete
	Sampling Analysis Form Finalized	6/22/93	Havenor	Complete
	Sampling	6/27/93	Havenor	Complete
	Analysis	7/21/93	Havenor	Complete
- GAC	drummed water			
	Treatment Plan to Indep. Safety	6/22/93	Havenor	Complete
	Treatment	8/20/93	Gale	
- coupon	testing for GAC canister corros.			
	coupons received	7/8/93	Cameron	Complete
	testing completed	8/6/93	Cameron	
- Gas	Membrane Separations System			
	Sample condensate	7/20/93	King	Complete
	Analyze condensate	7/29/93	Rohay	Complete
- provide	summary analysis report			
	Rev. 0	6/18/93	Dippre	Complete
	Rev. 0 update	6/24/93	Dippre	Complete
	Rev. 1	7/22/93	Dippre	Complete
o	Priority Planning Grid (PPG) and "Root Cause" analysis		Driggers	
	- determine PPG risk value	6/12/93	Galgoul	Complete
	- "Root Cause" Analysis			
	kickoff meeting	6/14/93	Dieffenbacher	Complete
	interviews	6/28/93	Dieffenbacher	Complete
	final report	7/20/93	Dieffenbacher	Complete
o	Unreviewed Safety Question (USQ) process		Driggers	
	- USQ initial screening	6/11/93	Lehrschall	Complete
	- USQ evaluation	6/16/93	Lehrschall	Complete
	- hazards evaluation	6/24/93	Lehrschall	Complete
	- accident credibility determination	8/6/93	Lehrschall	
	- accident scenario consequence analysis			
	phosgene creation	8/6/93	Lehrschall	
	HCl production	8/6/93	Lehrschall	
	CO production	8/6/93	Lehrschall	
	- controls/corrective actions determin.	8/13/93	Lehrschall	
o	Distribute incident information	TBD	Rohay	
	- Hanford			
	- VES operations at other DOE sites			

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3. INTERIM RESTART STRATEGY FOR Z-1A/Z-18		Rohay	
o Determine interim corrective actions	7/15/93	Driggers	Complete
o Provide Justification for Continued Operations (JCO)			
- determine basis for JCO	7/6/93	Driggers	Complete
- draft JCO	7/12/93	Driggers	Complete
- JCO review	7/13/93	Driggers	Complete
- presentation to WHC level 2 management	7/16/93	Johnson	Complete
- JCO approval	8/5/93*	Hagood	
o Develop Readiness Checklist	7/30/93	Driggers	Complete
o Revise controlling documents			
- Pre-fire plan	6/17/93	Tuttle	Complete
- field operating procedures	8/13/93	Driggers	
- HWOP	8/13/93	Tuttle	
- SAD	8/13/93	Lehrschall	
o Brief DOE-RL on restart operations	8/26/93*	Rohay	
o Brief regulators on restart operations	8/30/93*	Rohay	
o Pre-job Safety Meeting	8/30/93	Tuttle	
o Z-1A/Z-18 VES Startup (1000 cfm)	8/31/93*	Gale	
4. INTERIM RESTART STRATEGY FOR Z-9		Rohay	
o Determine interim corrective actions		Driggers	
o Provide Justification for Continued Operations (JCO)			
- determine basis for JCO		Driggers	
- JCO review		Driggers	
- presentation to WHC level 2 management		Johnson	
- JCO approval		Driggers	
o Develop Readiness Checklist		Driggers	
o Revise controlling documents			
- TI-010		Driggers	
- operating procedures		Driggers	
- HWOP		Tuttle	
- SAD		Lehrschall	
o Brief DOE-RL on restart operations		Rohay	
o Brief regulators on restart operations		Rohay	
o Pre-job Safety Meeting		Tuttle	
o Z-9 VES Startup (1500 cfm, 500 cfm)		Gale	

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5. UPGRADED VES OPERATIONS

Rohay

o Evaluate potential system design/
engineering controls

Driggers/ERA team

- provide airflow through GAC canisters at shutdown to remove heat
- prewet GAC before adsorption operations
- install thermocouple trees
 - deliver clean GAC to 306 building 6/16/93 Gale Complete
 - site visit by 306 bldg. staff 6/22/93 Gale Complete
 - develop and fabricate 6/25/93 Gale Complete
 - initial testing 6/28/93 Gale Complete
 - followup testing 7/23/93 Peters Complete
- install carbon monoxide monitors downstream of GACs to detect combustion Fisler
- install HCl monitors Fisler
- limit total carbon tetrachloride loading to reduce heat buildup
- internal GAC water shower
- provide extra moisture-laden ambient air through GACs during operations to remove more heat
- utilize parallel treatment trains to split total carbon tetrachloride loading in canisters to mitigate heat buildup

o Evaluate Alternative Treatments

- install off-the-shelf condenser to reduce carbon tetrachloride loading on GAC
 - determine cost/technical feasibility of off-the-shelf condenser 8/6/93 Cameron
 - check WHC excess list 8/13/93 Smearman
 - procure and install condenser Gale/Driggers
 - recycle condensed carbon tet Driggers/Cameron
 - convert condensate to TCA and recycle Driggers/Cameron
 - load condensate into GAC/ship offsite Rohay
- install catalytic oxidation unit
- use different GAC material
- establish onsite treatment

o Impact on existing GAC contract

o Procurement/delivery of equipment

TBD

Gale

o Equipment installation

TBD

Gale

o Determine regulatory constraints on system

TBD

Cameron

o Revision of controlling documents

TBD

- TI-010 Driggers
- Safety Analysis Lehrschall
- HWOP Tuttle
- operating procedures Driggers

o Safety Meeting

TBD

Tuttle

o Brief DOE-RL

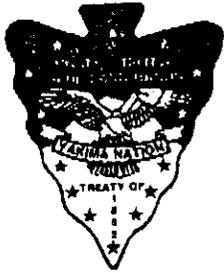
o Systems Startup

TBD

Gale

* Schedule assumes acceptance by management and other parties to proceed with certain engineering changes and procurement of VES equipment in parallel with the "incident analysis". Schedule may be impacted due to Safety Analysis results or management direction.

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Confederated Tribes and Bands
of the Yakima Indian Nation

Established by the
Treaty of June 9, 1855

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To Pamela Innis	From F.R. Cook
Co.	Co.
Dept.	Phone # 946-0101
Fax # 376-2396	Fax # 943-8555

August 3, 1993

Ms. Pamela Innis
United States Environmental Protection Agency
712 Swift Blvd. Suite 5
Richland, WA 99352

Subject: WHITE BLUFFS PICKLING ACID CRIBS EXPEDITED RESPONSE
ACTION; ENVIRONMENTAL HAZARDS AND REMEDIATION
OPTIONS; COMMENTS ON--

Dear Ms. Innis:

Thank you for the opportunity to comment on the White Bluffs
Pickling Acid Cribs Expedited Response Action.

As you may know, the Confederated Tribes and Bands of the Yakima
Nation (YIN) have reserved Treaty rights regarding the usage of
various natural resources on the Hanford Reservation and is
interested and concerned with respect to the health and
environmental hazards and alternatives to remediate these hazards.

The following are supplementary matters affecting remediation of
100-IU-5:

1. As stated in the Engineering Evaluation/Cost Analysis (EE/CA),
the Environmental Protection Agency (EPA), Washington State
Department of Ecology (Ecology), and the Department of Energy (DOE)
have agreed to share joint responsibility and regulatory oversight
of 100-IU-5, including the Acid Pickling Cribs. The EE/CA should
include a description of the process of how a lead agency is
designated and whether the designation affects the selection of
processes used to involve interested parties and hence the decision
regarding remediation.

2. The EE/CA should describe why the White Bluffs Acid Pickling
Cribs were delineated for separate consideration from other
contamination zones in the 100-IU-5 area. For example, the Acid
Pickling Cribs are surrounded by the JA Jones Construction Pit #2,
White Bluffs Landfill, and East White Bluffs Landfill. Hence, the
EE/CA should consider the whole 100-IU-5 area for remediation in
order to determine the cumulative contamination and the cumulative
affects in the area.

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3. The EE/CA should explain how the Tri-Party members reached the conclusion to administer the Environmental Engineering/Cost Analyses (EE/CA) tool in remediation investigation, data collecting, and remediation alternatives. Further, the EE/CA does not indicate why this is an expedited response action. An Expedited Response Action usually requires some type of exigency or emergency situation involving health risks or serious and continuing contamination of the environment. The EE/CA should state what regulations it satisfies (besides 40 CFR 300.415(b)(4)(i)), and whether it satisfies any other of the remediation alternatives.

4. In addition to lead agency selection, the EE/CA should include whether the Tri-Party members signed a Superfund Memorandum of Agreement (SMOA) on this remediation area. And it should also include whether other options or decisions by the Tri-Party members are to be considered at a later date and affect the remediation of 100-IU-5.

5. The surveys and investigations of 100-IU-5 should include a Natural Resource Damage Assessment. This will provide invaluable information; will provide a backdrop for the level of cleanliness necessary to avoid injury; and will provide a base for selecting remediation alternatives.

6. Dust emissions during remediation activities should either be eliminated or minimized so as to not contaminate surrounding and otherwise clean soil, provide a safe working environment for workers, and protect the surrounding natural resources.

7. EPA should consider utilizing new technology in remediation and removal. This is guidance expressed in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), section 40 CFR part 300.430(a)(1)(iii)(E).

8. Prior to initiating the remediation process, an archeological and cultural survey should be conducted to preserve and protect any archeological sites, cemeteries, or cultural items that may exist in this area.

9. The EE/CA should state whether there is vadose zone or groundwater contamination and what methods were utilized to make that determination.

10. Re-vegetation of the area with native plants should be accomplished. The Yakima Indian Nation should be consulted on the details of the re-vegetation plans to assure introduction of desirable species is accomplished.