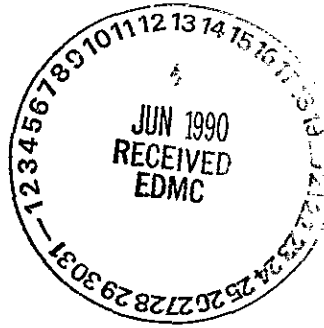


START



May 29, 1990
Final

Meeting Minutes Transmittal/Approval
Unit Mangers Meeting: Grout Treatment Facility

Meeting Held April 17, 1990
and concluded on April 19, 1990

Appvl. Clifford E. Clark Date: 5-31-90
 Clifford E. Clark, Environmental Policy and Permitting, DOE-RL

Appvl. Daniel L. Duncan Date: 5-31-90
 Daniel L. Duncan, EPA Region X Unit Manager

Appvl. Jeff Voogd Date: 5-31-90
 Jeff Voogd, Unit Manager, WHC

Appvl. Susan M. Price Date: 6-8-90
 Susan M. Price, RCRA Permitting, WHC

Appvl. Joseph Witczak Date: 5/31/90
 Joseph Witczak, Unit Manger, Washington State Department of Ecology

PURPOSE: Discuss schedule, NOD responses, and permitting process.

Meeting Minutes are attached. Note: These minutes summarize discussions from both the April 17 meeting and the concluding conference call on April 19. Minutes are comprised of the following:

- Attachment #1 - Summary of Discussion and Commitments
- Attachment #2 - Agenda
- Attachment #3 - Attendance List
- Attachment #4 - Commitments/Agreements Status
- Attachment #5 - Documents provided during 04/17/90 meeting:
 - Engineering Change Notices (cover only attached)
 - "Tempest" manual (cover and copyright information attached)
 - "Chemical and Biological Toxicity Assessment of Simulated Low-Level Grouts" SA-0861-S
 - "Application of Remote Nondestructive Test Methods for Quality Verification of Grouted Radioactive Waste" SA-0560-FP
- Attachment #6 - Grout Monthly Status Report - March, 1990

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Attachment #1
Summary of Discussion and Commitments

Schedule

- a. DOE (Cliff Clark) discussed with Ecology (Joe Witczak) the request for an extension on responding to the Notice of Deficiencies (NOD) on the Part B Permit Application. DOE brought to Ecology's attention that DOE/WHC staff availability will be impacted by the DOE-HQ "Tiger Team" inspection during May through July. Ecology suggested the following: (1) a list be provided at the next unit managers' meeting which lists comment numbers and status of responses, (2) a partial response table be provided by June 30, and (3) the completed response table be combined with responses on the May NOD and submitted together.

Action Item #1: WHC (Jeff Voogd/Stam Hill) will provide Ecology a list at the May, 1990, Unit Managers' Meeting which lists NOD comment numbers and the status of responses.

- b. WHC (Jeff Voogd) brought to Ecology's attention that the Part B Permit may not be approved prior to start of operations.
- c. WHC requested an indication from Ecology as to when the next set of NOD comments on the GTF design can be expected. Ecology anticipates that the NOD will be transmitted around May 31, 1990. WHC requested as much advance notice as possible on specifics of the comments.
- d. WHC (Sue Price) asked for clarification on the anticipated review cycle. Ecology suggested the following schedule, based on the target date of May, 1991 for beginning of vault filling. (All dates are to be considered approximate.)

June 30, 1990: Partial response table submitted to Ecology.
July 31, 1990: Final response table submitted to Ecology.
July 31 - beginning of Oct 1990: Comments incorporated by WHC.
beginning of Oct, 1990: Revised document transmitted to Ecology.
beginning of Nov, 1990: Final document submitted to Ecology.
beginning of Nov - beginning of Dec, 1990: Public comment period.
mid-Dec: Public meeting.
mid-Dec thru mid-Feb: Ecology to respond to public comments.
mid-Feb thru mid-April: Document printing by DOE/WHC.
May, 1991: Final application issued.

- e. Ecology stated that, until written guidance is available on the Hanford Site-Wide permitting process, permitting of units should proceed as usual. Ecology and EPA do not foresee any schedule impacts on permitting of units by site-wide permitting process. Discussions on the site-wide permit will be ongoing.

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- f. Construction of vaults is presently three months behind schedule. Mechanisms to recover the lost time are being explored; however, Jeff Voogd stated that it will be difficult to compress the schedule to make up for delays. The original target date for beginning to fill vaults is May, 1991. Two vaults are on "fast track" for construction. Construction of the diffusion break has been started.
- g. Ecology stated that a second DST vault cannot be filled until the first DST vault has been cored, sampled, and results received by Ecology. This requirement may impact the Tri-Party Agreement (TPA) milestone of filling three vaults during 1991. Presently WHC does not have the equipment available to perform DST vault coring. WHC is evaluating equipment alternatives and sampling method alternatives.

EPA suggested that a revised TPA schedule not be proposed until the May NOD has been received and until the PSW coring data is available. PSW core drilling data should be available in approximately March 1, 1991.

Ecology directed WHC to commit to core sampling in the permit application. The permit application does not need to specify a single sampling technique but instead can list technique alternatives. Discussions on requirements for core sampling and use of NDTE data are to be ongoing.

- h. DOE/WHC informed Ecology/EPA that the Final Safety Analysis Report (FSAR) has not been completed. The FSAR is a critical path item for start-up per DOE Orders.

NOD Responses

comment #2: Ecology clarified that the Dry Materials Facility (DMF) is not considered a regulated unit from the standpoint that certain aspects of the Dangerous Waste Regulations, such as closure plans and groundwater monitoring, which are associated with "regulated units" will not be imposed on the DMF. However, regulatory oversight of the DMF is required as cited in the NOD comment and the information requested will be required as a general permit condition. The information requests in the comment are to assure that the DMF is adequately controlled.

comments #6 and 227: Ecology acknowledges that the comment may necessitate double signing. The specific method of implementation (e.g., second sign, new combination sign, hazardous waste sticker on radiation sign, etc.) is at the discretion of DOE/WHC. The request only applies to new sites.

comment #9: WHC requested clarification on closure as a landfill. EPA explained that the classification of the unit as a surface impoundment will not change and the Part A should always reference the unit as such. The cold cap is to be considered a closure activity. The unit will not be clean closed but instead will be closed as a landfill.

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Action Item #2: EPA (Dan Duncan) will send DOE (Cliff Clark) the RCRA citation for closure of a surface impoundment as a landfill.

comment #10: Response is partially completed. Video was provided at the April, 1990 Unit Managers' Meeting (UMM).

comment #17: Ecology suggested an approach for the response concerning the mixer would be to describe current lab practices and to describe standard industry practices.

comment #26: Discussions on core sampling are to be ongoing.

comment #29: WHC clarified the thermal design parameters and explained the use of models as backup to the design parameters. Discussions on thermal modelling will be ongoing.

comment #36: Proposed response will explain the types of information concerning the sludge that will be obtained from sampling at the interface.

comments #38 and #206: DOE/WHC stated that their position is firm and requested that the issue be elevated to the project manager level.

Agreement: DOE/WHC, EPA, and Ecology agreed to initiate dispute resolution on the issues expressed in NOD Comments #38 and #206.

Action Item #3: EPA (Dan Duncan) will elevate the issues expressed in NOD Comments #38 and #206 to the project manager level.

comment #53: A proposed response is to state that WHC will be required to obtain Ecology approval prior to use of additives. WHC must notify Ecology of intended additives as soon as they are considered. Adequate lead time (e.g., greater than 30 days) must be given to Ecology for evaluation of additives prior to approval. The Part B does not need to identify specific additives. Use of additives will not require permit modification.

comment #54: A proposed response is to state that WHC must obtain approval prior to use of any decontamination agent other than water.

comments #56 and 251: WHC stated that the recommendation in the comment presents operational problems. Ecology will consider recycling/flushing when evaluating decontamination agents. A proposed response would be to stipulate that recycling can only occur after sampling of the material and written approval by Ecology.

Action Item #4: WHC (Jeff Voogd) is to provide Ecology with documentation (e.g., a flowsheet) on the sources, quantities, and

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concentrations of liquid effluents to the LCT. This documentation is to be provided at the May, 1990, UMM.

Action Item #5: WHC (Jeff Voogd) is to provide Ecology with documentation on the chemical analyses of PSW leachate. This documentation is to be provided at the May, 1990, UMM.

comment #68: Ecology stated that a meeting will be scheduled to discuss their consultants' concerns. Temperature profiling and grout formulation will be key topics. NOD comments will be transmitted a couple of weeks later than the scheduled May 17 date. WHC raised the concern that the design NOD comments could become a critical path item if receipt is delayed.

Ecology stated that construction of the catch basin could probably proceed without risk even though the NOD comments have not been received by WHC. Ecology stated that construction of the HDPE liner would be at risk if started prior to receipt of the NOD comments.

comment #69: Ecology suggested that a two day hydrostatic test may not be long enough. The diffusion rate through concrete and the allowable leak rate (ALR) should be considered when determining test length. Ecology suggested that WHC should determine if any industry standards exist for hydrostatic testing.

comment #70: Response should be deferred until performance of the HDPE liner has been evaluated. The Part B does not need to identify specific additives. Use of additives will not require permit modification.

comments #122-128: Review of the closure plan by Ecology has a lower priority. Ecology assured DOE/WHC that timing of the closure plan review will not have an adverse impact on progress.

comments #132 and 133: Ecology recommended that WHC consult with Dr. Daniel of the University of Texas - Austin concerning the use of calcium bentonite in the clay liners.

comment #134: Ecology reiterated that all deviations should be highlighted in the application as a separate section.

Action Item #6: EPA (Dan Duncan) will inform WHC (Stan Hill) how EPA typically handles variances, i.e., if variances are listed in a letter v.s. included in the application. EPA will call WHC by April 27, 1990.

comments #142 and 143: Discussions will be ongoing at a meeting between WHC and Ecology/Ecology's consultants. WHC will discuss data collected to date but a document will not be available yet.

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comment #176: The draft monthly report for April, 1990 is in the DOE review cycle. The method of transmittal will be via an attachment to the UMM minutes.

comment #177: WHC reminded Ecology/EPA that the "Tempest" manual is subject to copyright restrictions. A letter stating the restrictions was provided with the manual. (see Attachment #5)

Action Item #7: WHC (Stan Hill) will provide to Ecology a list of the computer programs used. The list will be available at the May, 1990, UMM.

comment # 179: The Part A will be updated.

comment #194: DOE/WHC requested that Ecology/EPA define their position on listed wastes at GTF. Discussions are to ongoing.

WHC will analyze for acetone and hexone as part of the full characterization of feed material.

| Ecology will not require, as part of the grout program, a full characterization of candidate tanks that have been eliminated from further consideration as potential feed material based on preliminary sampling results (e.g., TOC analysis). Full characterization is only required for candidate tanks that are selected as feed material.

comment #196: Ecology does not believe that previously collected EP Toxicity data must be disregarded. The EP Toxicity method can be used for now although a regulation change is forthcoming (Nov/Dec timeframe). The regulations will adopt TCLP as the prescribed method instead of EP Toxicity.

comments #201 and 210: Ecology requested that the "TBP tank" be referenced as the "de-foamer tank" in the permit application text and drawings. The tank label and WHC internal plant drawings can remain as "TBP" until the tank is put into service with contents other than TBP.

comment #202: Ecology stated that the most recent version should be used.

comment #203: Ecology stated that the intended use of the data (e.g., process characterization, waste designation, etc.) should be considered when evaluating method modifications.

| comment #206: EPA allows for the use of simulants in liner testing i.e. EPA 9090 testing. EPA will evaluate the use of simulants. Ecology is evaluating the use of simulants.

comments #207 and 235: The comment author (Megan Lerchen, Ecology) made the same comment on the 616 NRDWSF Part B permit application. Megan Lerchen agreed, at the April 616 NRDWSF UMM, to a proposed response of replacing the

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sample procedure with a description of operations. Joe Witczak (Ecology) felt that since the comment author was satisfied with the proposed response at the other UMM then the same response would be acceptable.

Action Item #8: Ecology (Joe Witczak) will obtain further clarification on comments #203, 204, 207, and 235 from the comment author (Megan Lerchen, Ecology). The comments will be discussed at the May, 1990, UMM.

comment #233: Ecology stated that 24 hour verbal notice in addition to 7 day written notice would be appropriate.

comment #236: WHC will incorporate the intent of the comment by improving the format appendix to aid in locating information.

Permitting Process

a. WHC requested information as to the format of the final operating permit. Ecology stated that the permit will be the application itself along with a fact sheet and a set of conditions.

Action Item #9: Ecology (Joe Witczak) will provide to DOE/WHC at the May, 1990, UMM an example of an permit fact sheet and a copy of the standard permit conditions.

b. WHC requested guidance from EPA and Ecology as to the interaction of the SEPA and NEPA documentation processes with the RCRA permitting process. Discussions will be ongoing.

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GTF UNIT MANAGERS MEETING
April 17, 1990

Attachment #2
Agenda

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Attachment #3
Attendance List

Meeting 04/17/90 at Lacey, WA

Cliff Clark	DOE-ERD
Dan Duncan	EPA
Holly Jo Harrison	IT/GSSC
Teresa Hennig	DOE-WMD
Stan Hill	WHC
Sue Price	WHC
Jeff Voogd	WHC
Joe Witczak	Ecology

Conference call 04/19/90 at Richland, WA

Cliff Clark	DOE-ERD
Maden Dev	DOE-WMD
Dan Duncan (via phone)	EPA
Holly Jo Harrison	IT/GSSC
Stan Hill	WHC
Sue Price	WHC
Jeff Voogd	WHC
Joe Witczak	Ecology

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Attachment #4
Commitments/Agreements Status (Status date: 04/20/90)

Action Items from February 26, 1990, Unit Managers' Meeting (UMM):

- o Ecology will provide to DOE/WHC a list of concerns that are considered a risk towards proceeding with vault construction.
Status: CLOSED. List discussed at March 26, 1990, UMM.
- o DOE/WHC is to provide to Ecology a monthly status report.
Status: OPEN.
- o DOE/WHC is to provide to Ecology a revised GTF NOD Table incorporating comments from Attachment #4 from 02/26/90 UMM.
Status: CLOSED. Action item cancelled.
- o Ecology will evaluate and inform DOE/WHC whether EP Toxicity testing and TCLP testing are both required or not.
Status: CLOSED. Discussed at April 17 & 19 UMM.

Action Items from March 26, 1990, UMM:

- o DOE/WHC will transmit a copy of grout pour video to Ecology.
Status: CLOSED. Video provided 04/17/90.
- o Ecology will clarify the closure requirements for surface impoundments to landfill status.
Status: CLOSED.
- o Ecology will determine if the DWEIS is acceptable for the required NEPA and SEPA documentation.
Status: OPEN. Ecology and EPA still evaluating NEPA and SEPA documentation requirements.
- o DOE/WHC will provide to Ecology a monthly status report of GTF activities around the 25th day of each month starting April, 1990.
Status: CLOSED. Included as Attachment #6 to these meeting minutes.

Action Items from April 17 & 19, 1990, UMM:

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GTF UNIT MANAGERS MEETING
April 17, 1990

Action Item #1: DOE-RL/WHC will provide Ecology a list at the May, 1990 unit managers' meeting which lists NOD comment numbers and the status of responses.

Status: OPEN.

Action Item #2: EPA (Dan Duncan) will send DOE (Cliff Clark) the RCRA citation for closure of a surface impoundment as a landfill.

Status: CLOSED. Citation transmitted 04/19/90.

Action Item #3: EPA (Dan Duncan) will elevate the issues expressed in NOD Comments #38 and #206 to the project manager level.

Status: OPEN. These comments regarding toxicity bioassay testing and book designation were elevated to the May 9, 1990 project managers meeting.

Action Item #4: WHC (Jeff Voogd) is to provide Ecology with documentation (e.g., a flowsheet) on the sources, quantities, and concentrations of liquid effluents to the LCT. This documentation is to be provided at the May, 1990, UMM.

Status: OPEN.

Action Item #5: WHC (Jeff Voogd) is to provide Ecology with documentation on the chemical analyses of PSW leachate. This documentation is to be provided at the May, 1990, UMM.

Status: OPEN.

Action Item #6: EPA (Dan Duncan) will inform WHC (Stan Hill) how EPA typically handles variances, i.e., if variances are listed in a letter v.s. included in the application. EPA will call WHC by April 27, 1990.

Status: CLOSED DOE-RL/WHC were informed on May 2, 1990 regarding variances. Variances are incorporated in specific permit conditions through the permit modification process. The request for variance should remain in the Administrative Record for the permit.

Action Item #7: WHC (Stan Hill) will provide to Ecology a list of the computer programs used. The list will be available at the May, 1990, UMM.

Status: OPEN.

Action Item #8: Ecology (Joe Witczak) will obtain further clarification on comments #203, 204, 207, and 235 from the comment

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author (Megan Lerchen, Ecology). The comments will be discussed at the May, 1990, UMM.

Status: OPEN.

Action Item #9: Ecology (Joe Witczak) will provide to DOE/WHC at the May UMM an example of an permit fact sheet and a copy of the standard permit conditions.

Status: OPEN.

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Attachment #5
Documents provided during meeting

Engineering Change Notices (cover only attached)

"Tempest" manual (cover and copyright information attached)

"Chemical and Biological Toxicity Assessment of Simulated Low-Level Grouts" SA-0861-S

"Application of Remote Nondestructive Test Methods for Quality Verification of Grouted Radioactive Waste" SA-0560-FP

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GTF UNIT MANAGERS MEETING
April 17, 1990

Attachment #6
March, 1990, GTF Status Report

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GTF UNIT MANAGERS MEETING
April 17, 1990

Distribution:

S.A. Benfer SWEC (A4-35)
J.D. Bauer WHC (B3-14)
R.M. Carosino DOE (A4-52)
C.E. Clark DOE (A6-95)
M.L. Cline WHC (R1-48)
M. Dev DOE (A6-80)
L.P. Diediker WHC (T1-30)
D.L. Duncan EPA
D.R. Ellingson WHC (R3-09)
C.J. Geier WHC (H4-57)
D.W. Hendrickson WHC (R1-48)
J.S. Hill WHC (H4-57)
R.D. Izatt DOE (A6-95)
D.A. Jones WHC (H4-16)
H.E. McGuire WHC (B2-35)
T.M. Michelena Ecology
L.L. Powers WHC (B2-35)
S.M. Price WHC (H4-57)
J.E. Van Beek WHC (R3-27)
J.A. Voogd WHC (R1-48)
J.L. Waite WHC (B2-35)
G.F. Williamson WHC (R1-48)
J.J. Witczak Ecology
EDMC WHC (H4-22)

ADMINISTRATIVE RECORD (Grout Treatment Facility)
[Care of Susan Wray, WHC (H4-22C)]

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