

START

Meeting Minutes Transmittal

325/3100 HAZARDOUS WASTE TREATMENT UNIT
Unit Managers Meeting
337 Building, Mt. Rainier Room
Richland, Washington

January 26, 1994
1:00 p.m. to 3:00 p.m.

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

for *Clifford E. Clark* Date: 2/22/94
Clifford E. Clark, Unit Manager, RL

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

Jeanne J. Wallace Date: 2/22/94
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

Kathleen A. Poston Date: 2/22/94
Kathleen A. Poston, Contractor Representative, PNL

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 - Copy of PNL Draft Letter to Ecology Regarding 325 HWTU and 325 SAL Consolidation



Attachment 1

325/3100 HAZARDOUS WASTE TREATMENT UNIT
Unit Managers Meeting
337 Building, Mt. Rainier Room
Richland, Washington

January 26, 1994
1:00 p.m. to 3:00 p.m.

Agenda

1. Approval of Past Unit Managers Meeting Minutes (Ecology/RL/PNL)
2. 325 HWTU Start-up Schedule (RL/PNL)
3. Status of RL/PNL Proposals (Ecology/RL/PNL)
 - Draft Proposal Letter
 - Physical/Chemical Treatment Test Facilities Notice of Intent
4. General Discussion (Ecology/RL/PNL)
5. Status Action Items (Ecology/RL/PNL)
 - Previous Action Items
 - RL/PNL will draft a letter to Ecology proposing the separation of 325 and 3100, and consolidation of 325 HWTU and 325 SAL. The scope of work for the two units will be attached to the letter. A draft copy of the letter will be sent to Ms. J. Wallace (Ecology) for review before the letter is formally transmitted to Ecology. (12-09-93:1)
 - New Action Items
6. Next Unit Managers Meeting (Ecology/RL/PNL)
 - Proposed February 22, 1994 date
 - Proposed topics

Attachment 2

325/3100 HAZARDOUS WASTE TREATMENT UNIT
Unit Managers Meeting
337 building, Mt. Rainier Room
Richland, Washington

January 26, 1994
1:00 p.m. to 3:00 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Unit Managers Meeting Minutes

- The December 9, 1993, Unit Manager Meeting minutes were approved and signed.

2. 325 HWTU Start-up Schedule

- Ms. K. Poston (PNL) reported that the operational readiness review (ORR) is ongoing. PNL has received comments regarding the operational readiness plan (ORP) checklist, and comments are being incorporated into the second version of the checklist. Ms. Poston indicated treatment activities would probably not begin within the next month.

3. Status of RL/PNL proposals

- Draft Proposal Letter

Ms. J. Wallace (Ecology) was provided a draft letter regarding RL/PNL's proposals for 325 HWTU and 325 SAL consolidation, and a scope of work summary (Attachment 5). Mr. Tilden addressed the first two bullets in the letter, which suggest deleting the 3100 Unit from the 325/3100 Part A permit application, and consolidating the Shielded Analytical Laboratory (SAL) under the 325 HWTU Part A and Part B permit application portions. RL/PNL suggest handling the separation and consolidation through the notice of deficiency (NOD) process rather than submitting a Tri-Party Agreement (TPA) change request. Ms. Wallace noted that RL/PNL have met the milestone associated with the submittal of the 325/3100 Part A and Part B permit applications. Mr. Tilden suggested designating the consolidated units as the 325 Hazardous Waste Treatment Units.

Mr. Tilden noted that PNL needs to add tank storage as soon as possible to facilitate the improved operation of the SAL. Mr. Tilden added that PNL proposes submitting a notice of intent (NOI) to apply for an expansion to add tank storage capacity before merging the 325 SAL with the 325 HWTU Part A permit application in an effort to avoid delaying the addition of tank storage.

Ms. Wallace referred to the committee that was to be formed within Ecology to establish a procedure for splitting and/or consolidating units, and reported that a committee had not been formed. Ms. Wallace added that Mr. T. Tebb (Ecology) had requested a summary of the units involved with the separation and consolidation, to be followed with a discussion with Ms. Wallace, Mr. Tebb and Ms. J. Atwood (Ecology).

- **Physical/Chemical Treatment Test Facilities Notice of Intent**

Mr. Tilden stated that the physical/chemical treatment test facilities notice of intent is addressed in the draft letter.

4. **General Discussion**

- Mr. Tilden inquired about Ecology's reorganization and Ms. Wallace's status as the unit manager for the 325/3100 HWTU. Ms. Wallace responded that no final decisions had been made.

5. **Status Action Items**

- Action item 12-9-93:1, RL/PNL will draft a letter to Ecology proposing the separation of 325 and 3100, and consolidation of 325 HWTU and 325 SAL. The scope of work for the two units will be attached to the letter. Ms. Wallace was provided a draft copy of the letter during the 1-26-94 Unit Managers Meeting, closing this action item.
- There were no new action items.

6. **Next Unit Managers Meeting**

- The next Unit Managers Meeting was scheduled for February 22, 1994.
- PNL will provide a status of the ORP at the next Unit Managers Meeting.

Attachment 4

325/3100 HAZARDOUS WASTE TREATMENT UNIT
Unit Managers Meeting
337 Building, Mt. Rainier Room
Richland, Washington

January 26, 1994
1:00 p.m. to 3:00 p.m.

Action Items

Action Item #

Description

12-09-93:1

RL/PNL will draft a letter to Ecology proposing the separation of 325 and 3100, and consolidation of 325 HWTU and 325 SAL. The scope of work for the two units will be attached to the letter. A draft copy of the letter will be sent to Ms. J. Wallace (Ecology) for review before the letter is formally transmitted to Ecology.

CLOSED

9613389.0583

Attachment 5

325/3100 HAZARDOUS WASTE TREATMENT UNIT
Unit Managers Meeting
337 Building, Mt. Rainier Room
Richland, Washington

January 26, 1994
1:00 p.m. to 3:00 p.m.

COPY OF PNL DRAFT LETTER TO ECOLOGY REGARDING
325 HWT AND 325 SAL CONSOLIDATION
AND
SCOPE OF WORK SUMMARY

Jeanne Wallace, Environmentalist
State of Washington
Department of Ecology
7601 West Clearwater, Suite 102
Kennewick, WA 99352

Dear Ms. Wallace:

**325 HAZARDOUS WASTE TREATMENT UNIT AND 325 SHIELDED ANALYTICAL LABORATORY
CONSOLIDATION**

As discussed with you in the December 9, 1993, 325/3100 Unit Managers Meeting, the Department of Energy, Richland Operations Office (DOE-RL) and the Pacific Northwest Laboratory (PNL) have developed a plan of action for managing the 325/3100 Hazardous Waste Treatment Unit (HWTU) and Physical/Chemical Treatment Test Facilities RCRA Part A and B Permit Applications. Currently the HWTU Part B Permit Application is beginning the Notice of Deficiency (NOD) cycle. The Physical/Chemical Treatment Test Facilities RCRA Part B Permit Application, which will include the 325 Shielded Analytical Laboratory (SAL) unit, is to be submitted in December 1994 to meet TPA Milestone M-20-43.

In order to increase efficiency in both the operation of the units under these permits and in preparing the extensive documentation described above, DOE-RL and PNL propose:

- Deleting the 3100 facility from the 325/3100 Part A (Form 3) and Part B Permit Applications, previously submitted to Ecology in June 1992. The 3100 facility project has no funding and no activities have been identified for it. Design and other activities associated with the unit will not be completed.
- Consolidating the 325 Shielded Analytical Laboratory (SAL) unit and activities with the 325 HWTU under the current 325/3100 HWTU Permit A and B Applications. (The 325 SAL is currently the only operating unit under the Physical/Chemical Treatment Test Facilities Part A Permit Application.) This removal/consolidation process will take place within the Notice of Deficiency cycle for the 325/3100 HWTU Part B Permit Application.
- Submitting a Notice of Intent (NOI) in accordance with WAC 173-303-281 to apply for an expansion to the Physical/Chemical Treatment Test Facilities Part A Permit Application to add tank storage capacity to the 325 SAL.

DOE

Jeanne Wallace
January 26, 1994
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- Administratively withdrawing the Physical/Chemical Treatment Test Facilities Part A Permit Application after the 325 SAL activities have been included in the 325 HWTU Permit Application. A Tri-Party Agreement (TPA) Change Package will be prepared which will include the withdrawal of the Physical/Chemical Treatment Test Facilities Part A Permit Application.
- Submitting a complete revised Part B Permit Application for the consolidated 325 unit by June 30, 1995.

The NOI to add tank storage capacity to the 325 SAL is necessary to increase the efficiency with which the SAL manages waste generated in support of the tank waste characterization program. This tank storage was not possible until the replacement of the radioactive liquid tank in the 325 SAL was completed. Estimated completion of this activity is March 31, 1994. Therefore, the preparation of a NOI is expected to be done as quickly as possible. The planned addition of the tank storage capacity to the Physical/Chemical Treatment Test Facilities Form 3 is brought to your attention due to the request to combine the two 325 units.

The implementation of the above actions would allow DOE-RL and PNL to consolidate similar 325 Building activities under the same management within the same Part B Permit Application. To demonstrate the similar activities of the two units, we have attached a brief summary of the scope of each unit. The proposed consolidation will also enable RL/PNL to combine the preparation efforts involved in preparing a Part B Permit Application for the Physical/Chemical Treatment Test Facilities and to meet revision requirements for the NOD cycle of the 325/3100 Part B Permit Application. A single Part B Permit Application for the two units will also minimize the resources required by DOE-RL, PNL and Ecology in the review and NOD comment cycles. Upon approval of the above plan of action by your department, DOE-RL and PNL, will prepare the revised (Part A) Form 3 and Part B Permit Applications for the consolidated 325 unit.

A timely response to the above action plan will be greatly appreciated due to the time constraints imposed by the TPA Milestone M-20-43, which requires the submittal of a Part B Permit Application for the Physical/Chemical Treatment Test Facilities by December 1994.

Jeanne Wallace
January 26, 1994
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If have any questions regarding the above, please contact Mr. C. E. Clark of DOE-RL on (509) 376-9333, or Mr. H. T. Tilden of PNL on (509) 376-0499.

Sincerely,

J. D. Bauer, Program Manager
Office of Environmental Assurance,
Permits and Policy

cc: EM Bowers, RL DC Nylander, Ecology
CE Clark, RL JR Shadel, RL
GR Hoenes, PNL

Attachment

9613389.0587

ATTACHMENT

325 Hazardous Waste Treatment Unit

and

325 Shielded Analytical Laboratory

Scope of Work Summary

325 HAZARDOUS WASTE TREATMENT UNIT

The 325 Hazardous Waste Treatment Unit (HWTU) is designed to be a limited scope waste pretreatment and storage unit and is permitted under interim status for operation under the Resource Conservation and Recovery Act (RCRA). The HWTU is located in two laboratories of the 325 Building, 300 Area, Hanford Site and is operated by the 325 Waste Handling Operations (WHO) group. This unit will support bench-scale analytical chemistry and research and development activities by accumulating, storing, and treating mixed wastes generated primarily at the Hanford Site. Operating the HWTU will allow such wastes to be pretreated to meet waste acceptance criteria at other Hanford Site (RCRA permitted) units.

Waste pretreatment processes allowable under the Part A permit include bench-scale operations such as pH adjustment, precipitation, ion exchange, solid and liquid separations, waste concentration by evaporation, oxidation, reduction, filtration, catalytic destruction, grouting, encapsulation, stabilization, and carbon absorption. The predominant processes initially employed will be pH adjustment, precipitation, solid and liquid separations, and grouting or stabilization. Other processes may be used infrequently, when unique wastes are generated which require such treatments.

In addition to treating wastes to meet waste acceptance criteria, the operation of the 325 HWTU will improve the waste management process within the 325 Building. Current practices provide for accumulation of wastes at the generating sites until volume limits are reached or sufficient waste is generated to ship directly to other units. The operation of the 325 HWTU will provide for rapid removal of mixed wastes from the laboratories where it is generated, and will decrease staff exposure and the potential for spills. The wastes will be managed in laboratories designed to meet regulatory requirements for waste storage rather than in research-focused laboratories. Accumulation of similar wastes in a single location will minimize waste handling and the number of resources used to store and/or treat the wastes.

325 HWTU activities performed by the WHO will be similar to activities currently performed on radioactive wastes which do not require a RCRA permit for storage and/or treatment. Current activities performed on radioactive wastes include elementary neutralization, stabilization and storage.

325 SHIELDED ANALYTICAL LABORATORY

The 325 (Building) Shielded Analytical Laboratory (SAL) is designed to be a high radiation level analytical chemistry facility which is integrated with the operations of other analytical chemistry laboratories in the 325 Building. The SAL consists of six cells that are interconnected and situated side by side, and the accompanying support space. The SAL serves two purposes: 1) sample preparation and analyses of highly radioactive materials for various clients, and 2) treatment of mixed wastes generated during the sample preparation and analysis. Operating the SAL allows such wastes to be pretreated to meet waste acceptance criteria at other Hanford Site (RCRA permitted) units.

Waste treatment processes allowable under the Part A Permit Application include pH adjustment, ion exchange, waste concentration by evaporation, waste dissolution by pH adjustment or fusion, precipitation/filtration and solvent extraction, solids washing, catalytic destruction, and grouting. Waste treatment processes currently used include pH adjustment, precipitation, filtration, ion exchange and grouting. Other processes may be used in the future, when unique wastes are generated which require such treatments. A small amount of containerized storage is allowed in the permit, although the Department of Energy, Richland Operations Office and/or the Pacific Northwest Laboratory anticipates adding the capability to store processed wastes in a new tank associated with the hot cells, once the tank has been certified to meet regulatory requirements and the NOI process has been completed.

Because the primary focus of the SAL is sample preparation and analysis, and operation of the SAL as a permitted unit supports this function, the quantities of waste anticipated to be treated is very low. The liquid treated waste is transferred through a piping system which requires mixing with non-hazardous liquids. Including this mixing, several hundred gallons of liquid waste may be transferred from the SAL each year. Historically, smaller quantities of solid mixed wastes are managed at the SAL, twelve to twenty 55-gallon drums per year.

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J. K. Bartz	MACTEC	B1-42
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K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
P. J. Turner	PNL	P7-34
J. J. Wallace	Ecology	B5-18

ADMINISTRATIVE RECORD: 325/3100 Hazardous Waste Treatment Unit, T-3-4
[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

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Please send comments on distribution list to K. E. Knox (H6-24),
(509) 372-3596.