

Meeting Minutes Transmittal

200 AREA EFFLUENT TREATMENT FACILITY (ETF)
and
LIQUID EFFLUENT RETENTION FACILITY (LERF)
and
242-A EVAPORATOR
Unit Managers Meeting
712 Swift, EPA Conference Room
Richland, Washington

December 6, 1994
10:30 a.m. - 12:00 p.m.

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

[Signature] Date: 2/15/95
Clifford G. Clark, Unit Manager, RL

[Signature] Date: 9/12/95
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

[Signature] Date: 8/31/95
Moses Jarayasi, LERF Unit Manager, Washington State Department of Ecology

[Signature] Date: 8/31/95
Alex Stone, 200 ETF/242-A Unit Manager, Washington State Department of Ecology

[Signature] Date: 2/21/95
Don Flyckt (Represented by Nancy A. Ballantyne)
200 ETF Contractor Representative, WHC

[Signature] Date:
Joe G. Coenenberg, LERF Contractor Representative, WHC

[Signature] Date: 2/21/95
Brian H. Von Bargen, 242-A 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 - Draft EPA Letter Dated 12-5-95 Regarding LERF LDR Treatment Exemption



Attachment 1

Unit Managers Meeting
200 AREA EFFLUENT TREATMENT FACILITY (ETF)
AND
LIQUID EFFLUENT RETENTION FACILITY (LERF)
AND
242-A EVAPORATOR
712 Swift, EPA Conference Room
Richland, Washington

December 6, 1994
10:30 a.m. to 12:00 p.m.

Agenda

200 Area Effluent Treatment Facility

1. Status of Schedule/Design/Construction
2. Program Status
3. General Discussion
4. Action Items

Liquid Effluent Retention Facility

1. Status of Permit Application
2. Program Status
3. General Discussion
 - RD&D Permit Status (Michael Schliebe)
4. Action Items

242-A Evaporator

1. Status of Permit Application
2. Program Status
3. General Discussion
4. Action Items
5. Set Next Meeting Date

Attachment 2

200 AREA EFFLUENT TREATMENT FACILITY
and
LIQUID EFFLUENT RETENTION FACILITY
and
242-A

Unit Managers Meeting
712 Swift, EPA Conference Room
Richland, Washington

December 6, 1994
10:30 a.m. to 12:00 p.m.

Summary of Discussion and Commitments/Agreements

200 AREA EFFLUENT TREATMENT FACILITY

1. STATUS OF SCHEDULE/DESIGN/CONSTRUCTION

Mr. J. Coenenberg (WHC) stated that during the Tri-Party Agreement (TPA) milestone meeting held previous to the Unit Manager Meeting (UMM), it was agreed that after today's UMM a status of the projects will be provided at the TPA milestone meetings instead of during the UMM.

Mr. A. Vogt (WHC) provided a status regarding the schedule for design and construction. Construction and testing are continuing. To date, 19 Acceptance Test Procedures (ATPs) have been completed and 25 ATPs are in progress. The scheduled completion date for testing and construction is February 1995. Mr. Vogt stated that Micon has resolved a majority of the computer problems and is no longer on the critical path. Mr. Vogt stated that Adtech has been giving four hours' notification before an ATP is run, and WHC has been present to support the testing.

Mr. M. Jaraysi (Ecology) inquired about the connection line between 200 ETF and LERF. Mr. Vogt responded that the tie-in line has been installed and backfilled, and WHC is working to dry the line in an effort to perform the leak detection.

Mr. A. Stone (Ecology) announced that this would be his last UMM, and that Mr. M. Gordon (Ecology) would be assuming the responsibility as unit manager for all three units.

2. PROGRAM STATUS

Mr. Coenenberg suggested that RL/WHC and Ecology meet to discuss the notice of deficiency (NOD) workshop schedule for consolidating the 200 ETF, LERF and 242-A Part B permit applications. Mr. Coenenberg noted that he had sent out a draft schedule to RL and Ecology. RL/WHC and Ecology agreed to the action to be

prepared to discuss the schedule at the next Unit Managers Meeting.

3. **GENERAL DISCUSSION**

There were no topics for general discussion.

4. **ACTION ITEMS**

There were no past action items to status. One new action item was generated for RL/WHC and Ecology to be prepared at the next UMM to discuss the schedule for consolidation of the three Part B permit applications (200 ETF, LERF and 242-A).

LIQUID EFFLUENT RETENTION FACILITY

1. **STATUS OF PERMIT APPLICATION**

Mr. Coenenberg stated that revision of the Part B permit application is on hold until the NOD workshop meetings begin and efforts to consolidate the three Part B permit applications (200 ETF, LERF and 242-A Evaporator) are initiated. An action item was generated during the 200 ETF portion of the meeting to discuss the schedule for consolidation at the next UMM.

Mr. Coenenberg suggested that the parties begin consolidation of the three Part B permit applications by addressing chapter 3, which comprises the waste analysis plan (WAP). Mr. C. Clark (RL) pointed out that RL received a letter from EPA requiring a WAP to use the LERF basins. Mr. Coenenberg added that 200 ETF must have a WAP for start-up.

Mr. Coenenberg stated that RL/WHC are drafting a WAP for 200 ETF, and he brought up the issue of approval to use LERF for treatment. At this point, a draft letter from EPA to RL dated December 5, 1994, regarding LERF land disposal restrictions treatment exemption was distributed (Attachment 5). Mr. Clark stated that the letter was marked draft due to an incorrect EPA/Ecology identification number on the letter, which has been corrected, and that the letter has been signed.

A discussion ensued regarding the intent of the letter. Mr. Clark noted that the letter does not directly state that waste can be treated in the LERF basins, but states that the EPA has determined the management of process condensate (PC) in LERF is consistent with the regulatory definition of treatment. At this point in the discussion, Mr. D. Duncan (EPA) joined the meeting via teleconference. Mr. Duncan reiterated Mr. Clark's reference to the letter, stating RL/WHC's management of the waste is consistent with the regulatory definition of treatment, and therefore the surface treatment impoundment exemption is applicable to LERF. Mr. Clark posed the question whether EPA's interpretation of the surface impoundment exemption would still apply if another waste stream was added to the basins. Mr. Duncan responded that the

interpretation expressed in the letter was applicable only to the 242-A Evaporator PC, and if another waste stream is added, the issue will have to be dealt with at that time.

Ms. M. Selby (Ecology) asked for clarification regarding the situation of a non-dangerous waste needing to be treated at 200 ETF to meet the state treatment requirements for discharge to the ground. Mr. Duncan explained that the letter addresses any hazardous waste subject to land disposal restrictions (LDR), and if the waste is not subject to LDR it is not covered by the letter. Mr. Coenenberg brought up the issue of annual cleanout. It was agreed among RL/WHC, Ecology and EPA to schedule a meeting on Thursday, December 8, 1994 to discuss the issue.

2. PROGRAM STATUS

There was no discussion under program status.

3. GENERAL DISCUSSION

• RD&D Permit Status

Mr. M. Schliebe (WHC) provided a status regarding the RD&D permit. Mr. Schliebe stated that the filtration equipment has been installed, and the professional engineer's certification and validation of the installation is ongoing. RL/WHC plan to complete the certification and validation this week, and following RL/WHC approval of the certification package it will be transmitted to Ecology and EPA. Mr. Schliebe stated that a practical start date for filtration testing would be January 16, 1995. Mr. Duncan inquired about the testing. Mr. Schliebe stated that a series of tests are planned for a week, and that the test plan has been provided to Ecology and EPA. Mr. Schliebe added that notification of further tests will be provided to Ecology and EPA. Mr. Schliebe indicated that further testing has been planned for the fiscal year, and that seasonal variations in the feed makeup would be the only potential difference in the tests. Mr. Duncan suggested that RL/WHC submit all of the planned tests in one notification letter.

4. ACTION ITEMS

Action item 8-23-94:1, WHC will notify Ecology and EPA by letter that leak testing on basin 44 passed, and that WHC will return to the original plan of two basin storage volume and one basin contingency volume.

Mr. M. Bowman (WHC) stated that the letter has been transmitted to DOE-RL. This action item will be left open until the letter is sent to Ecology and EPA.

Action item 10-6-94:2, Ecology will determine if there needs to be a presentation to the public on the use of LERF for pH treatment.

This action item was closed via EPA's 12-5-94 letter to RL regarding LERF LDR treatment exemption. Mr. M. Gordon (Ecology) noted that this item would be covered during the Hanford Facility Permit public comment period.

242-A EVAPORATOR

1. STATUS OF PERMIT APPLICATION

It was agreed among RL/WHC and Ecology to take an action to be prepared to discuss the NOD workshop schedule to consolidate the three Part B permit applications (200 ETF, LERF and 242-A Evaporator).

2. PROGRAM STATUS

Mr. B. Von Bargaen (WHC) provided the program status. Mr. Von Bargaen stated that the 242-A Evaporator started up September 22, 1994, and shut down November 19, 1994. There were 3.21 million gallons at the beginning of start-up. WHC's goal was to achieve 87.5 percent waste volume reduction (WVR), and an 86.9 percent waste volume reduction was achieved (2.79 million gallons). The ending slurry volume was 142 inches (which equals 390,500 gallons). The PC to WVR ratio was 1.24 (which means 1.24 gallons of PC produced per gallon of tank waste reduction), and the PC to LERF was 3.45 million gallons. The total in basins 42 and 43 is 6.53 million gallons.

Mr. Stone inquired about the tanks that will be used for the campaigns scheduled for June 1995 and October 1995. Mr. Von Bargaen responded that in June 1995, tanks 106 AP and 107 AP will be used. The October 1995 campaign will use tank 101 AY; however, it will be staged in an AP tank. Mr. Stone asked if the waste had been in tanks 106 AP and 107 AP for some time. Mr. Von Bargaen responded that the waste in 106 AP had been in the tank for awhile, noting that the original intent had been to grout the waste. Mr. Von Bargaen explained that after tank 106 AP was characterized for grout, the 242-A Evaporator program collected the data, studied the quality control, and determined it was acceptable based on the new requirements (given in the DQO document). WHC plans to reuse a portion of the data, and a significant number of analyses have been reduced. Mr. Von Bargaen stated that WHC plans to rerun the regulatory analytes, but has cut back on the radionuclides and inorganic analytes significantly. Mr. Von Bargaen added that the waste in 107 AP will be comprised of waste from tanks 103 AW and 104 AW, which is PUREX waste that has been contained in tanks 103 AW and 104 AW for some time.

3. GENERAL DISCUSSION

There were no topics for general discussion.

4. ACTION ITEMS

Action item 5-19-94:1, Provide Ecology the waste analysis plan sampling data when available from the first campaign.

Mr. M. Bowman (WHC) stated that the slurry data was received in November 1994, and a cover letter is being prepared to transmit the data to Ecology by the end of the December 1994. This action item was left open.

Action item 10-6-94:1, Provide Ecology a schedule of the 242-A Evaporator campaigns, including the projected start and end date of each campaign, and the tanks that will be used.

This action item was left open.

5. SET NEXT MEETING DATE

The next Unit Managers Meeting was scheduled for January 10, 1995, from 9:30 a.m. to 11 a.m.

Attachment 3

200 AREA EFFLUENT TREATMENT FACILITY
and
LIQUID EFFLUENT RETENTION FACILITY
and
242-A EVAPORATOR
Unit Managers Meeting
712 Swift, EPA Conference Room
Richland, Washington

December 6, 1994
10:30 a.m. - 12:00 p.m.

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone #</u>
Walter C. Alaconis	WHC	(509) 376-9390
Brad P. Atencio	WHC	(509) 372-1727
Tejpal Basra	WHC	(509) 373-5039
Nancy A. Ballantyne	WHC	(509) 372-1547
Anna V. Beard	DOE-RL	(509) 376-7472
Donna J. Berryman	WHC	(509) 373-1279
Mark W. Bowman	WHC	(509) 373-9379
Clifford E. Clark	DOE-RL	(509) 376-9333
Joe G. Coenenberg	WHC	(509) 376-1745
Daniel L. Duncan	EPA	(206) 553-6693
Mike Gordon	Ecology	(206) 407-7143
Moses N. Jaraysi	Ecology	(509) 736-3016
Kathy E. Knox	WHC	(509) 372-3596
Steve J. Lijek	GSSC	(509) 376-2512
Jeff R. Markillie	GSSC	(509) 946-3685
Jack J. Noble	WHC	(509) 376-8092
Dom Reale	Ecology	(206) 407-6266
Michael J. Royack	DOE-RL	(509) 376-4420
Mike J. Schliebe	WHC	(509) 373-4454
Alex B. Stone	Ecology	(509) 736-3018
Armin K. Vogt	WHC	(509) 376-2352
Brian H. Von Bargen	WHC	(509) 373-1829

Attachment 4

200 AREA EFFLUENT TREATMENT FACILITY
and
LIQUID EFFLUENT RETENTION FACILITY
and
242-A EVAPORATOR
Unit Mangers Meeting
712 Swift, EPA Conference Room
Richland, Washington

December 6, 1994
10:30 a.m. - 12:00 p.m.

Action Items

<u>Action Item</u>	<u>Description</u>
200 ETF:	
12-6-94:1	RL/WHC and Ecology will be prepared at the next UMM to discuss the schedule for consolidation of the three Part B permit applications (200 ETF, LERF and 242-A).
	OPEN
LERF:	
8-23-94:1	WHC will notify Ecology and EPA by letter that leak testing on basin 44 passed, and that WHC will return to the original plan of two basins storage volume and one basin contingency volume. ACTION: M. Bowman (WHC)
	OPEN
10-6-94:1	WHC will check to see if public involvement is required to eliminate TPA milestones M-26-03 and M-26-04. ACTION: S. Godfrey (WHC)
	CLOSED
10-6-94:2	Ecology will determine if there needs to be a presentation to the public on the use of LERF for pH treatment. ACTION: M. Jaraysi (Ecology)
	CLOSED

242-A Evaporator:

5-19-94:1

Provide Ecology the Waste Analysis Plan sampling data when available from the first campaign.
ACTION: L. Garner (WHC)

OPEN

10-6-94:1

Provide Ecology a schedule of the 242-A Evaporator campaigns, including the projected start and end date of each campaign and the tanks that will be used.
ACTION: C. Ruud (DOE-RL)

OPEN

9513383.1111

Attachment 5

200 AREA EFFLUENT TREATMENT FACILITY
and
LIQUID EFFLUENT RETENTION FACILITY
and
242-A EVAPORATOR
Unit Mangers Meeting
712 Swift, EPA Conference Room
Richland, Washington

December 6, 1994
10:30 a.m. - 12:00 p.m.

DRAFT EPA LETTER DATED 12-5-94 REGARDING LERF LDR TREATMENT EXEMPTION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

372-1926
372-1926
376-7816

December 5 1994

Reply To
Attn. Of: EW-106

OPTIONAL FORM 28 (7-90)

FAX TRANSMITTAL

of pages 2

June Henning, Director
Waste Programs Division
Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

To	Cliff Clark	From	Don Duran
Dept/Agency		Phone #	(206) 553-6693
Fax #	(509) 376-0306	Fax #	8509
<small>NSN 7540-01-217-7368</small>		<small>5089-107</small>	
<small>GENERAL SERVICES ADMINISTRATION</small>			

Re: Liquid Effluent Retention Facility (LERF)
Land Disposal Restrictions Treatment Exemption - Regulatory Interpretation
EPA/Ecology ID No: WA7 89000 (8967)

DRAFT

Dear Ms. Henning:

The United States Environmental Protection Agency, Region 10 ("EPA"), has reviewed applicability of the surface impoundment exemption from land disposal restriction ("LDR") regulations, codified at 40 CFR § 268.4, to the Liquid Effluent Retention Facility ("LERF"). EPA has determined that management of 242-A Evaporator Process Condensate in the LERF prior to treatment in the C-018 Effluent Treatment Facility ("ETF") is consistent with the regulatory definition of "treatment" at 40 CFR § 260.10 in the context of the 40 CFR § 268.4 treatment exemption. Thus, the 40 CFR § 268.4 treatment surface impoundment exemption is applicable to the LERF.

To qualify for the 40 CFR § 268.4 exemption, the Department of Energy - Richland Operations Office ("Energy") must also fully comply with the following requirements in 40 CFR § 268.4(a)(2): (i) Sampling and Testing; (ii) Annual Removal; (iii) Subsequent Management; and (iv) Recordkeeping. Finally, pursuant to 40 CFR § 268.4(a)(4), Energy must submit written certification to the EPA Region 10 Regional Administrator that the LERF surface impoundments meet the requirements of 40 CFR § 268.4(3) as well as a copy of the LERF Waste Analysis Plan required under 40 CFR § 268.4(a)(2).

This letter addresses only the issue of the 40 CFR § 268.4 treatment exemption. The Washington State Department of Ecology ("Ecology") may impose other conditions or requirements through the Hanford Federal Facility RCRA Permit, or to comply with interim status requirements. These issues will be addressed directly by Ecology.

12/08/93 11:41 515383.1115 EPA REGION 10

Should you have any questions or need any additional information, please feel free to contact Dave Bartus at (206) 553-2804 or myself at (206) 553-6693.

Sincerely,



Daniel Duncan, Environmental Engineer
RCRA Permits Section

cc: Cliff Clark, Energy
Moses Jaraysi, Ecology
Steve Silverman, OGC-RCRA
Joe Witczak, Ecology

Distribution:

W. C. Alaconis	WHC	H6-32
L. D. Arnold	WHC	B2-35
N. A. Ballantyne	WHC	T7-38
T. S. Basra	WHC	R1-51
A. V. Beard	RL	S7-55
M. W. Bowman	WHC	R1-52
R. C. Bowman	WHC	H6-24
D. C. Bryson	RL	A5-21
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
J. G. Coenenberg	WHC	H6-24
A. J. DiLiberto	WHC	R3-46
D. L. Duncan	EPA	HW-106
D. L. Flyckt	WHC	S6-71
L. A. Garner	WHC	R1-52
S. D. Godfrey	WHC	B2-35
M. N. Jaraysi	Ecology	B5-18
P. W. Jones	RL	A5-15
J. W. Kelly	WHC	S6-76
P. J. Mackey	WHC	B3-15
J. R. Markillie	GSSC	B1-42
G. R. Mezger	RL	A5-18
J. J. Noble	WHC	S6-76
S. M. Price	WHC	H6-23
M. J. Royack	RL	S7-52
M. A. Selby	Ecology	B5-18
H. T. Tilden II	PNL	P7-68
B. H. Von Bargaen	WHC	R1-43
J. D. Williams	WHC	H6-28
RCRA Files/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: 200 Area Effluent Treatment Facility (ETF, aka PROJECT C-018H), TSD T-2-8; Liquid Effluent Retention Facility (LERF) TSD S-2-8; 242-A Evaporator, TSD T-2-6 [Care of EDMC, 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, Mail Stop HW-074 (Records Center)

Please send comments on distribution list to K. E. Knox, WHC (H6-23), (509) 372-3596