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MAR 3 1 1992

Mr David B. Jansen, P.E.
Hanford Project Manager
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Jansen:

MEETING MINUTES OF MR. GARY ANDERSON'S VISIT TO HANFORD ON 3/16/92 AND 3/17/92

On Monday 3/16/92, Mr. Gary Anderson, of the State of Washington Department of Ecology (Ecology), visited the UO_3 Plant and the Plutonium Finishing Plant. On Tuesday 3/17/92, Mr. Anderson visited the PUREX Plant and T-Plant. During these visits, Mr. Anderson met with cognizant WHC and Richland Field Office (RL) personnel to discuss Ecology's concerns regarding the individual Sampling and Analysis Plans (SAPs). Attached are a compilation of meeting minutes from the visit. Attachment I is a compilation of his visits to the plants listed above and Attachment II are minutes from discussions on Project C-124.

If you have any questions or corrections to the meeting minutes please contact me on 509-376-7471 or Dennis A. Brown, of my staff on 509-376-7660.

Sincerely,

J. E. Mecca

J.E. Mecca, Director
Operations Division

OPD:DAB

Attachments

cc w/atts:
G. Anderson, Ecology
P. T. Day, EPA
R. E. Lerch, WHC
J. C. Midgett, WHC
M. Haas, WHC
G. W. Faulk, WHC

ATTACHMENT I

MEETING MINUTES

GENERAL COMMENTS

Gary Anderson began each meeting with four general comments which he wanted RL/WHC to keep in mind when presenting information to Ecology:

- **Everybody knows** syndrome - Gary realized that there is a substantial amount of historical knowledge concerning various liquid effluent streams. In Gary's opinion, this knowledge base manifests itself in a tendency to assume a general knowledge of a particular streams' water quality. To the extent possible, RL/WHC must demonstrate water quality, with data, when making reference to such water quality.

- **Effluent stream dilution** - Ecology is taking a strong stance that prohibits dilution of a more contaminated liquid effluent stream with a less contaminated liquid effluent stream. All individual contributors to a given waste stream should be sampled, and analyzed, whenever possible. Gary realized that Hanford facilities are somewhat antiquated and may not allow for sampling of all individual contributors to a given stream. The SAP should demonstrate when physical plant configuration precludes sampling of each individual contributor to a waste stream. In addition, the SAP should describe how sampling will be conducted so as to assure that the various flow regimes are represented.

- **Steam Condensate** - Ecology is concerned about the potential for metal contamination of the steam condensate. This could result from steam pipe degradation. In an attempt to address this concern RL/WHC should sample and analyze at least one representative sample of steam condensate at each facility. The plan for such sampling should be included in the SAP.

- References to the **Stream Specific Reports (SSR)** - Any references to the data in these reports should not imply validation of the SSR. The SSRs were not accepted by Ecology as being valid. The SAP should not state that a particular stream is considered nonhazardous as validated by data presented in the SSR.

3/16/92 - UO_3 Plant

Attendees: Gary Anderson, Lilly Adams, Dave Bergmann, Dennis Brown, Tom Clark, Jim Cottrell, Rick Gonzalez, Greg Millward, Alan Olander, Rudy Ollero

Gary expressed a desire to see a separate characterization of the 1) C-2 waste concentrator effluent and 2) the UNH concentrator effluent. In response to this request it was explained to Gary that the effluents coming off the C-2 concentrator and the UNH concentrator were offgases.

These offgases are condensed in the ED-3 concentrator. Therefore, it is not possible for separate characterization of these two streams. Gary stated that he would like to see this explained in the SAP.

Gary was then escorted throughout the plant and was shown the potential sources of waste-water.

3/16/92 - PFP

Attendees: Gary Anderson, Dann Alison, E.G. Backlund, J.L. Brand, Dennis Brown, L.A. Garner, Rick Gonzalez, D.R. Hirzel, John Kovacs, Alan Olander, Rudy Ollero

Gary viewed drawing #H-2-97310 and agreed that it satisfied Ecology's needs with regard to identification of the waste-water drainage system. This drawing will be included in the SAP.

Gary indicated that Ecology's review of the Quality Assurance Project Plan (QAPP) has been completed, and that Ecology comments on section C through G of the PFP waste-water SAP would be forthcoming.

Gary was then escorted throughout the PFP, including the RMC line chemical preparation room. Gary verified source controls on the waste-water drains, viewed manholes 3 & 4, and viewed the 2904-ZA and the 2904-ZB sampling buildings and the sampling equipment therein.

3/17/92 - PUREX

Attendees: Gary Anderson, Lee Geiger, Rick Gonzalez, Chris Wollam, Alan Olander, Rudy Ollero

Gary Anderson covered the general comments noted above and proceeded to tour the PUREX facility. A specific comment about the PUREX SAP concerned Figure K.2-3. This figure could be misconstrued to indicate that clean effluent streams are mixed with contaminated streams. All drawings and text should be reviewed to assure that there is no indication that a less contaminated effluent is diluting a more contaminated effluent (unless this is unavoidable).

Gary viewed numerous waste stream sources (drains, sumps, etc.) in the PUREX facility as well as the sampling utilized to monitor the Chemical Sewer Line.

3/17/92 - T Plant

Attendees: Gary Anderson, Jay Bottenus, Rick Gonzalez, Alan Olander, Rudy Ollero

After Gary presented his general comments, Jay stated that the steam condensate will, eventually, be the only T Plant liquid effluent. Gary stated that the SAP should identify which liquid effluent streams are destined to be eliminated.

Gary was then escorted throughout T Plant where he viewed all potential sources of liquid effluent (floor drains, sumps, steam condensate lines, etc.).

Attachment II

MEETING MINUTES

DISCUSSIONS WITH GARY ANDERSON CONCERNING THE C-124 PROJECT

On 3/17/92 Gary Anderson visited the PUREX facility. Topics of discussion included the PUREX Chemical Sewer Line (CSL), associated sampling systems, and the C-124 project. Ben Burton, Rudy Ollero, Chris Wollam, Lee Geiger, and Rick Gonzalez were present.

During this meeting Gary was presented with the following information:

The C-124 project involves the relining of the CSL.

The C-124 project has been reevaluated and RL has determined that the project is not necessary. This decision is based on: 1) the high quality of the liquid effluent discharged to the CSL, and 2) the excellent condition of the vitrified clay pipe (as evidenced by a video camera survey).

Gary was then taken on a tour of the CSL. During this tour two manhole covers were removed so Gary could view the sewer. All potential sources which feed the CSL and which were classified as source category F (in the 240 Engineering Report) were viewed.

After leaving PUREX, the group met with Ivan Papp at the 300 Area and viewed part of the video footage of the CSL.

Upon concluding the meeting, Gary stated the sewer appeared to be in good condition and that he agreed that relining did not appear to be necessary. He requested that we provide Ecology with a letter stating our position on the C-124 project. This letter should include data which demonstrates the quality of the liquid in the CSL. Upon further discussion Gary agreed that any reference to a C-124 type project should be deleted in future versions of the 240 Engineering report and/or page changes should be submitted to revise the existing version.

References to this project were made in the PUREX Plant Chemical Sewer BAT/AKART Technology Evaluation, Appendix K of the 240 Engineering Report, WHC-SD-W049H-003, Rev. 0. This evaluation determined that planned source control was the BAT/AKART alternative of choice.

Appendix K includes two references to a C-124 type project:

..."subject to finalizing a scope of work, the plant is committed to replacing some portion(s) of the existing vitrified-clay sewer piping to eliminate potential leaks into the soil through hairline cracks." (Section K.7.6)

..."The primary tasks remaining to be accomplished at PUREX to implement BAT/AKART for PUREX Plant Chemical Sewer are completion to the catch pan

and roof structure at the unloading spot 1 and replacement or repair of certain sections of existing, vitrified-clay sewer pipe (primarily under roads and railroad tracks) which contain hairline cracks." (Section K 8.0)

CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: MEETING MINUTES OF MR. GARY ANDERSON'S VISIT TO HANFORD ON 3/16/92 AND 3/17/92

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