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# Meeting Minutes Transmittal - Approval


**Project Managers Meeting**
**300 AREA WASTE ACID TREATMENT SYSTEM**
**2440 Stevens Center Building, Room 2200**
**Richland, Washington**

**Meeting Held October 2, 1997**
**From 2:30 PM to 3:30 PM**

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

Ellen Mattlin Date: 11/4/97
Ellen M. Mattlin, Project Manager, RL

for Jeanne P. Davis Date: 11/6/97
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

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300 Area WATS, Contractor Concurrence

Scott H Luke Date: 11/6/97
Scott N. Luke, Permitting Contractor Representative, WMH

John A Remaine Date: 11-6-97
Ivan L. Metcalf, Facility Contractor Representative, BWHC

Not present
Date:
F. A. Ruck, Project Hanford Management Contractor Representative, FDH

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Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:
Attachment 1 - Meeting Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments
Attachment 5 - Professional Engineer's Phase 1 Closure Certification

**Attachment 1**

**Project Managers Meeting**
**300 AREA WASTE ACID TREATMENT SYSTEM**
**2440 Stevens Center Building, Room 2200**
**Richland, Washington**

**Meeting Held October 2, 1997**
**From 2:30 PM to 3:30 PM**

## Agenda

1. Approval of Past PMM Minutes

2. Status PMM Action Items

3. Closure Activities
   - Closure Plan Approval (DOE/RL-90-11, Rev 1)
     - Ecology informal comments
     - NOD response resolution
     - Status transition discussions
   - Status Phase 1 closure activities (313 Building)
   - Phase 2 Closure approval

4. New Business

5. Schedule Next Closure Plan Approval Workshop

6. Schedule Next Project Managers Meeting

Attachment 2

**Project Managers Meeting**
**300 AREA WASTE ACID TREATMENT SYSTEM**
**2440 Stevens Center Building, Room 2200**
**Richland, Washington**

**Meeting Held September 11, 1997**
**From 2:30 PM to 3:30 PM**

**Summary of Discussion and Commitments/Agreements**

## 1. Approval of Past PMM Minutes

The September WATS PMM minutes were approved by the RL and Ecology Project Managers.

## 2. Status PMM Action Items

1. At the September PMM, BWHC (Mr. I. L. Metcalf) took the action to set up a budget meeting between Ecology and BWHC's Budget Analyst, Donna Brockman. This meeting occurred and the results were discussed at this PMM.

2. At the September PMM, WMH (Mr. S. N. Luke) took the action to schedule an Informal Comment closeout meeting with Ecology. The meeting occurred September 25, 1997 and results were discussed at this PMM.

3. At the September PMM, Ecology (Ms. Greta P. Davis) took the action to review the Phase 2 Decontamination and Inspection Plan (DIP) and to provide a timeframe for DIP comments. Ecology began its DIP review and preliminary concerns were discussed at this PMM.

## 3. Closure Activities

- **Closure Plan Approval (DOE/RL-90-11, Rev 1)**

**Ecology 'Informal' comments.** WMH (Luke) and Ecology (Davis) met on September 25, 1997 to close out Informal Comments. At that meeting, and since then electronically (for I-57 through I-61), Ecology concurred with closure of all Informal Comments by acceptance of draft closure plan text changes or by deferral of the concern to a still open NOD.

**NOD response resolution.** WMH (Luke) indicated that per Attachment 4, **Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments**, 22 NODs still remain unclosed. A meeting was scheduled for October 7, 1997, at the Kennewick Ecology Office to focus on a short-list of 16 NODs that look to be resolvable without policy decisions that must come from outside of the workshop process.

**Status of RL Program discussions on soil transition to CERCLA.** RL (Mr. Mark Hahn) stated that RL Project Directors, Mr. Richard A. Holten of Restoration Projects Division (RPD) and Mr. James E. Mecca of Transition Projects Division (TPD), had postponed until October, a meeting to address programmatic transition of WATS soils and subfloor infrastructures to CERCLA.

- **Status Phase 1 closure activities (313 Building)**

BWHC (Mr. James Rich) indicated that scabbling in the 313 Building was completed September 30, 1997. Scabbling was the last step in closure of this location from 'the floor up' with regard to contamination from RCRA operations. John Ludowise, the certifying PE, inspected the location September 30, 1997 and provided his certification and supporting report (Attachment 5). An Ecology 313 Building walkdown was scheduled for October 6, 1997. WMH (Luke) indicated that RL would look forward to written confirmation from Ecology that closure of this location from 'the floor up' with regard to contamination from RCRA operations was complete. The PE certification and Ecology concurrence letters taken together would provide phase-specific concurrence to facilitate final unit closure.

- **Phase 2 Closure approval**

Ecology (Davis) stated that review of the Draft Phase 2 Closure Decontamination and Inspection Plan (DIP), HNF-SD-ENV-AP-003, Rev. 0, was ongoing. Ecology had no formal comments yet but voiced a concern regarding the lack of detail regarding decontamination and inspection activities. Ecology (Davis) indicated that she would be available to meet regarding the DIP on October 7, 1997. The time for that meeting would be set during the October 6 meeting.

Ecology (Ms. Jeanne J. Wallace) asked if the DIP approval process was adversely impacting BWHC's Phase 2 Closure activities. BWHC (Metcalf) responded saying that the absence of the DIP had not as yet adversely impacted physical Phase 2 Closure activities because preliminary activities (e.g., waste designation sample planning) were still ongoing. However, because DIP approval and issuance had been expected to complete in FY 1997 and so was not funded in FY 1998, it was taking funding earmarked for other uses and so should be completed in the most timely manner.

4. **New Business**

Ecology (Wallace) indicated that in the future she would prefer that budget discussions be limited to the 300 Area General meeting. Budget would no longer be discussed at individual unit meetings unless budget constraints were impacting the performance of closure activities.

## 5. Schedule Next Closure Plan Approval Workshop

The next workshop was set for October 6, 1997 to be dedicated to resolution of open NODs (Attachment 4). A followup meeting that could also include Phase 2 DIP discussions was scheduled for October 7, 1997.

## 6. Schedule Next Project Managers Meeting

The next 300 Area WATS PMM was scheduled for November 6, 1997.

Attachment 3

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held October 2, 1997
From 2:30 PM to 3:30 PM

Attendance List

| Name | Organization | Phone # |
|---|---|---|
| Scott Luke | WMH | 372-1067 |
| Mark Hahn | DOE-RL/TPD | 373-9872 |
| JOHN A REMAIZE | BWHC | 372-1462 |
| Joanne J Wallace | Ecology | 736-3019 |
| Greta Davis | Ecology | 736-3025 |
| ELLEN MATTLIN | DOE-RL | 376-2385 |
| IVAN METCALF | BWH-FSS | 376-7675 |
| Jim Rich | BWHC | 376-3890 |
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Attachment 4

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held September 11, 1997
From 2:30 PM to 3:30 PM

Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments

**Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments**

As of September 11, 1997

| NOD No. | Closed (x[1]) | NOD No. | Closed (x) | NOD No. | Closed (x) |
|---|---|---|---|---|---|
| 1 | x | 26 | x | 51 | |
| 2 | | 27 | x | 52 | |
| 3 | | 28 | | 53 | |
| 4 | x | 29 | x | 54 | x |
| 5 | | 30 | x | 55 | x |
| 6 | x | 31 | x | 56 | x |
| 7 | x | 32 | x | 57 | x |
| 8 | x | 33 | | 58 | |
| 9 | x | 34 | | 59 | x |
| 10 | | 35 | | 60 | |
| 11 | | 36 | x | 61 | |
| 12 | | 37 | x | G-1 | |
| 13 | x | 38 | x | | |
| 14 | | 39 | | | |
| 15 | | 40 | x | | |
| 16 | | 41 | x | | |
| 17 | | 42 | x | | |
| 18 | | 43 | x | | |
| 19 | | 44 | x | | |
| 20 | x | 45 | | | |
| 21 | x | 46 | x | | |
| 22 | x | 47 | x | | |
| 23 | x | 48 | x | | |
| 24 | x | 49 | x | | |
| 25 | x | 50 | x | | |

Notes: X indicates the NOD is closed by Ecology acceptance of the comment response and any associated closure plan text changes.

Attachment 5

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held October 2, 1997
From 2:30 PM to 3:30 PM

Professional Engineer's Phase 1 Closure Certification

CH2M HILL
3190 George Washington Way
Suite B
Richland, WA
99352-1659
Tel 509.375.3444
Fax 509.375.5566

CH2MHILL

Celebrating 50 Years

September 30, 1997

Mr. Scott N. Luke
Waste Management Federal Services of Hanford, Inc.
MSIN H6-24
P.O. Box 700
Richland, WA 99352

Subject: Professional Engineer's Certification of Phase 1 Closure of the 300 Area Waste Acid Treatment System, Task Order 048 under Purchase Order TTB-SLW-415662

Dear Scott:

Enclosed, please find the signed and stamped Professional Engineer's Certification Statement and the attachment Specifications and Limitations of Professional Engineer's Certification for the subject Task Order. If you have any questions concerning this material, please contact me at (509) 372-9664.

Sincerely,

CH2M HILL

John D. Ludowise, P.E.
Task Manager

cc: L. Rex Miller
File-Correspondence out

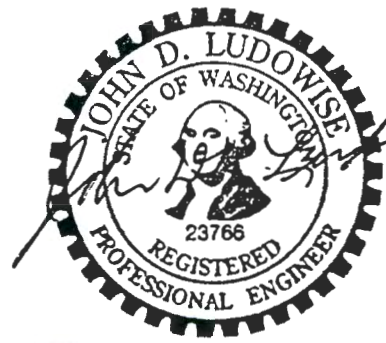
Enclosure

# PROFESSIONAL ENGINEER'S CERTIFICATION FOR THE PHASE 1 CLOSURE OF THE 300 AREA WASTE ACID TREATMENT SYSTEM

I, the undersigned, an independent registered Professional Engineer, hereby certify that, to the best of my knowledge and belief, all Phase 1 closure activities for the 300 Area Waste Acid Treatment System were performed in accordance with the approved 300 Area Waste Acid Treatment System Closure Plan and other relevant documents. This certification is based solely on a review of pertinent documents, interviews of cognizant project personnel, my personal observations of decontamination activities, and my own inspection of the decontaminated facility which are described in the attached Specifications and Limitations of Professional Engineer's Certification.

The above statements are true and complete to the best of my knowledge and within the limits of professional judgment under the prevailing standards of practice on this 30th day of September, 1997.

John D. Ludowise
Washington # 23766
CH2M HILL, Inc.




9-30-97

EXPIRES: 2/9/98

# SPECIFICATIONS AND LIMITATIONS OF PROFESSIONAL ENGINEER'S CERTIFICATION FOR THE PHASE 1 CLOSURE OF THE 300 AREA WASTE ACID TREATMENT SYSTEM

The 300 Area Waste Acid Treatment System (WATS) operated as an interim status Resource Conservation and Recovery Act of 1976 (RCRA) treatment, storage and/or disposal (TSD) unit in the tank treatment and storage of dangerous and mixed waste. The 300 Area WATS operations were conducted in portions of four buildings and two tank farms: the 313 Building; the 334-A Building; the 333 Building; the 303-F Building; the 334 Tank Farm; and the 311 Tank Farm. The 300 Area WATS is designated to clean close under RCRA and Washington Administrative Code (WAC) 173-303-610. The closure strategy is to clean close the site through decontamination or removal of contaminated equipment, structures and components in three phases. Phase 1 addresses closure of RCRA portions of the 313 Building. A revised Phase 1 Closure Plan for the 300 Area Waste Acid Treatment System (WATS) was published in March of 1996 (Ref. 1) and a decontamination and inspection plan (DIP) for Phase 1 closure activities was approved in December of 1996 (Ref. 2). The DIP supplements the closure plan and describes the decontamination and verification inspection activities that support the partial clean closure of the RCRA portions of the 313 Building that are part of the 300 Area WATS.

The requirement of the Phase 1 closure strategy (Ref. 2) is to partially clean close the 300 Area WATS portions of the 313 Building "from the floor up." This requirement will be accomplished by: (1) removal of all 300 Area WATS equipment and tank system components from the 313 Building as debris after designation and decontamination (as necessary); (2) decontamination to clean closure standards of the building and secondary containment structures that will remain at the unit after closure; and (3) inspection of remaining structures for attainment of clean closure standards.

The equipment, tank system, and associated piping in the 300 Area WATS portions of the 313 Building were removed from the building over the period between April 1997 and August 1997. Regular updates from the cognizant project engineer plus field inspections by John D. Ludowise (the P.E.), were used to determine that equipment and tank removal activities were conducted according to the DIP.

Decontamination to clean closure standards were conducted between August 1997 and lasted through September 1997. Decontamination activities included the use of air hammers and scabbling equipment. Regular updates from the cognizant project engineer plus field inspections by the P.E., were used to determine that decontamination was conducted in accordance with the DIP, and as amended by the project managers (Ref. 3). Decontamination activities included: the complete removal of acid brick; the scabbling of concrete and concrete block surfaces to a depth of at least one-quarter inch; and removal of equipment pedestals and cleaning of two stainless steel drainage trenches. The removal of the acid brick and equipment pedestals was not specifically required by the DIP, but was done to expedite the decontamination operation and is consistent with the intent of the DIP. The lower 12 inches of concrete block walls was scabbled to a depth of at least one-quarter inch. Two drainage ditches were decontaminated using a combination of hand scrubbing and electric and pneumatic sanding.

An inspection of the facility was conducted by the P.E. on September 30, 1997 for the purpose of confirming that the remaining structures attain clean closure standards. With the exceptions noted

and explained below, the P.E. observed that decontamination activities of building and secondary containment structures has resulted in a "clean debris surface" as defined in 40 Code of Federal Regulations (CFR) 268.45, Table I, and as required by the Closure Plan (Ref. 1). Under 40 CFR 268.45, the definition of "'clean debris surface' means the surface, when viewed without magnification, shall be free of all visible contaminated soil and hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discoloration, and soil and waste in cracks, crevices, and pits may be present provided that such staining and waste and soil in cracks, crevices, and pits shall be limited to no more than 5% of each square inch of surface area."

Exceptions noted during the inspection by the P.E. on September 30, 1997:

1. The concrete floor area in the general vicinity of where Tank 2 once stood has an orange colored stain that appears to be rust. This area was covered with acid brick in early 1953 (Ref. 1) and the pattern of the stain is fairly widespread, and is not consistent with what would be expected if a leak had penetrated cracks in the acid brick and/or mortar. In some areas, there is evidence that the black mastic material that held the acid brick to the floor was laid on top of the rust colored stain so the stain would probably have occurred due to operations conducted prior to 1953 and thus predate RCRA operations which began in 1980.

2. The floor area immediately adjacent to and to the north of the drainage trench in bermed area #1 (Ref. 1) has a rust colored stain. The trench has carbon steel components which were covered by the acid brick in 1953 (Ref. 1). Similar to the discussion above, the stain probably occurred from operations that predate the installation of the acid brick in 1953.

3. The lower portion of the wall area in the northwest ofbermed area #1 has an accumulation of yellow powder about 4 inches above the floor in an area in which the acid bricks were removed. It is possible that the substance is a uranium compound that leaked from either of two uranium-bearing acid holding tanks were located in this general vicinity (Ref. 1). Many uranium compounds, including uranyl nitrate and uranium trioxide are yellow. The yellow powder is fairly widespread and the distribution is not consistent with what would be expected if material penetrated a crack in the acid brick and/or mortar. There was no indication of a crack in the acid bricks or mortar in this location (Ref. 1). The deposition of the yellow material would probably have occurred due to operations conducted prior to 1953 and thus predate RCRA operations which began in 1980.

## DOCUMENTS REVIEWED FOR PROFESSIONAL ENGINEER'S CERTIFICATION FOR THE PHASE 1 CLOSURE OF THE 300 AREA WASTE ACID TREATMENT SYSTEM

1. *300 Area Waste Acid Treatment System Closure Plan,*DOE/RL-90-11, Rev. 1, Dated March 1996, U.S. Department of Energy, Richland, Washington.

2. *Decontamination and Inspection Plan for Phase 1 Closure of the 300 Area Waste Acid Treatment System,* WHC-SD-ENV-AP-001, Rev. 0, Dated December 17, 1996, Rust Federal Services of Hanford Inc., Richland, Washington.

3. Meeting Minutes: "Project Managers Meeting, 300 Area Waste Acid Treatment System," August 7, 1997.

Distribution:

| | | |
|---|---|---|
| R. C. Bowman | WMH | H6-24 |
| G. P. Davis | Ecology | B5-18 |
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| M. R. Hahn | RL | R3-79 |
| S. N. Luke | WMH | H6-24 |
| E. M. Mattlin | RL | A5-15 |
| I. L. Metcalf | BWHC | L6-26 |
| J. A. Remaize | BWHC | L6-26 |
| J. W. Rich | BWHC | L6-26 |
| F. A. Ruck | FDH | H6-22 |
| J. M. Steffen | BWHC | N1-47 |
| J. J. Wallace | Ecology | B5-18 |
| T. A. Wooley | Ecology | B5-18 |
| Field File Custodian | WMH | H6-08 |
| RCRA File | WMH | H6-23 |

ADMINISTRATIVE RECORD: 300 Area Waste Acid Treatment System Closure Plan, TS-3-1 [Care of EDMC, FDH (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Hanford Files, P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-074 (Record Center)

Please send comments on distribution list to Scott Luke (H6-24), (509) 372-1667.