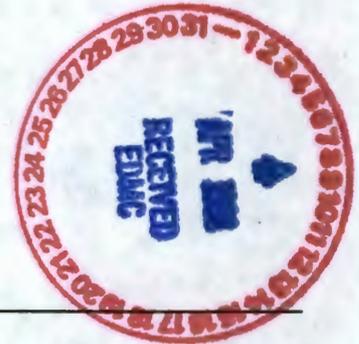


Meeting Minutes Transmittal - Approval

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
Federal Building, Room 590A
Richland, Washington

Meeting Held March 5, 1998
From 3:00 PM to 4:00 PM



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

Ellen M. Mattlin Date: 4/2/98
Ellen M. Mattlin, Project Manager, RL

Jeanne J. Wallace Date: 4/2/98
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

300 Area WATS, Contractor Concurrence

Scott N. Luke Date: 4/2/98
Scott N. Luke, Permitting Contractor Representative, WMH

Ivan L. Metcalf Date: 4-2-98
Ivan L. Metcalf, Facility Contractor Representative, BWHC

Not present

Date: _____
F. A. Ruck, Project Hanford Management Contractor Representative, FDH

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 - Ecology Phase 1 Closure Letter Dated March 3, 1998
- Attachment 5 - Ecology 300 Area Facilities LRA Letter Dated September 30, 1996

Distribution:

R. C. Bowman	WMH	H6-24
G. P. Davis	Ecology	B5-18
M. DeLeon	FDH	N1-26
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
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
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Please send comments on distribution list to Scott Luke (H6-24),
(509) 372-1667.

Attachment 1

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
Federal Building, Room 590A
Richland, Washington

Meeting Held March 5, 1998
From 3:30 PM to 4:00 PM

Agenda

1. Approval of Past PMM Minutes
2. Status PMM Action Items
3. Closure Activities
 - Closure Plan Approval (DOE/RL-90-11, Rev 2)
 - Delay closure plan inclusion into the HFP from Mod D to Mod E
 - NOD response resolution
 - Scope of closure discussions
 - Phase 1 Closure (313 Building)
 - Ecology Phase 1 Closure acceptance letter
 - Reduced RCRA inspections letter for 313 South
 - Phase 2 Closure (333, 334-A, 303-F Buildings)
 - Phase 2 Decontamination and Inspection Plan (DIP) approval
 - Status Phase 2 Closure activities
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
Federal Building, Room 590A
Richland, Washington

Meeting Held March 5, 1998
From 3:30 PM to 4:00 PM

Summary of Discussion and Commitments/Agreements

1. Approval of Past PMM Minutes

The January WATS PMM minutes were approved by RL (Mr. Tony McKarns for Ms. Ellen Mattlin, the RL Project Manager) and by the Ecology Project Manager, Ms. Jeanne Wallace.

2. Status PMM Action Items

None

3. Closure Activities

- Closure Plan Approval (DOE/RL-90-11, Rev 2)

Delaying closure plan approval from Mod D to Mod E. WMH (S.N.Luke) reported that delaying inclusion of the WATS closure plan into the Hanford Facility RCRA Permit from Mod D (1998) to Mod E (1999) was discussed at the February Permit Steering Committee meeting. The reasons for proposing this slip were provided electronically to Ecology (Ms. G. Davis) February 2, 1998. The primary reason was that because of unresolved soil issues, chapters 6.0 (closure strategy) and 7.0 (closure activities; sampling, SAP, QAPjP) cannot be finalized in time for inclusion into the Permit. Other considerations for delaying closure plan approval include: allowing time to reach soil policy/agreements, the lack of Tri-Party Agreement drivers, Phase 3 DIP would already be finalized, and the lack of funding risks to ongoing phased closure activities or to closure plan completion.

NOD response resolution. On February 4, 1998, Ecology (Davis) accepted the closure plan text changes for General NOD 1.c and NODs 2, 10, 15, and 18, and indicated that these NODs could be considered closed.

Ecology (Davis) reported that the remaining soil-related NODs had been discussed by EPA and Ecology. Regulators had met to reach an understanding with regard to CERCLA 300-FF-2 OU acceptance of

soils and infrastructures contaminated by past-practice activities. Ecology indicated that it would provide information in the form of meeting minutes, during the week of March 9, 1998.

Scope of closure discussions. WMH (Luke) indicated that there had been no interface between RL EM-40 and EM-60 programs in the last month.

At this time, Ecology (Wallace) provided an EPA memorandum of understanding (MOU) dated September 30, 1996 (Attachment 5) identifying Ecology as the lead regulatory agency (LRA) for all EM-60, Transition Facility, facilities and for all 300 Area facilities after transition to EM-40, Environmental Restoration.

- **Phase 1 Closure (313 Building)**

Ecology Phase 1 Closure acceptance letter. Ecology (Davis) provided a letter from Ecology dated March 3, 1998 (Attachment 4), confirming that WATS Phase 1 closure activities for the 313 Building from 'the floor up' with regard to contamination from RCRA operations were in accordance with the Phase 1 Decontamination and Inspection Plan.

Reduced RCRA inspections letter for 313 South. Ecology (Davis) reported having received RL's letter requesting reduced inspections of the WATS portions of the 313 Building. Ecology further indicated this request was under consideration by Ecology.

- **Phase 2 Closure (333, 334-A, 303-F Buildings)**

Phase 2 Decontamination and Inspection Plan (DIP) Approval. On January 28, 1998, Ecology concurred with the version of the Phase 2 DIP provided to Ecology December 17, 1997. This version included editorial changes originating from final tech edit and revised closure activities for the 334-A Building.

Status Phase 2 Closure Activities. BWHC (Rich) reported Phase 2 closure waste characterization sampling was completed and results were expected soon. The results would be used in preparation of the Phase 2 Waste Certification Summary that addresses designation of Phase 2 closure debris.

BWHC reported that it is preparing air permitting documents Notice(s) of Construction (NOC) for Phase 2 closure activities that are required to be submitted to the EPA, Ecology, and the DOH. The NOC application(s) would be submitted to RL soon.

4. **New Business**

- **Funding for 313 South demolition.** Ecology (Davis) asked for clarification with regard to funding for demolition of the 313 Building. BWHC (Mr. Ivan Metcalf) responded that FY 2000 funding was earmarked for

building isolation (that could evolve into demolition) to be performed by EM-60.

- **Funding for EM-40 completion of activities after transition.** Ecology (Wallace) requested funding information for EM-40 (D&D) completion of activities transitioned by EM-60. She indicated that BWHC (Rick Milliken) provides funding information in a format that Ecology is familiar with. Such budget information would likely best be provided in the General 300 Area meeting. RL (Mr. R. X. Gonzalez) indicated that if Ecology desires, an EM-40 budget person could be provided to better explain D&D's budget processes and priorities.

5. Schedule Next Closure Plan Approval Workshop

The next closure plan approval workshop would be contingent upon receipt of Ecology comments on NOD responses and so was not set.

6. Schedule Next Project Managers Meeting

The next 300 Area WATS PMM was scheduled for April 2, 1998.

Attachment 4

**Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
Federal Building, Room 590A
Richland, Washington**

**Meeting Held March 5, 1998
From 3:30 PM to 4:00 PM**

Ecology Letter (dated March 3, 1998):

Reissue of Phase 1 Closure Letter

(2 pages including cover page)

48675



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

March 3, 1998

Mr. James E. Rasmussen
U.S. Department Of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 99352

Dear Mr. Rasmussen:

Re: Washington State Department of Ecology (Ecology) Letter to James E. Rasmussen,
Dated February 4, 1998

This letter is being reissued as information was inadvertently omitted from the referenced letter.

Ecology has reviewed and evaluated Phase 1 of the proposed three (3) phase closure strategy for the 300 Area Waste Acid Treatment System Closure (WATS). Ecology has no additional comments on the Phase 1 Decontamination and Inspection Plan (DIP).

A final walkdown for the conclusion of Phase 1 work was performed during the week of October 6, 1997. These closure activities are being carried out prior to the final approval of this unit's closure plan, which requires a public review and comment process to be completed before Ecology can make the final decision. Hence, all this work is completed under your own risk, knowing that the public review process may result in a major change to the existing closure plan. During the walkdown, it was observed that all activities had been performed in accordance with the DIP specifications originally submitted to Ecology.

If you have any questions regarding the above information, please contact me at (509) 736-3025.

Sincerely,

Greta P. Davis, 300 Area WATS Sub-Project Manager
Nuclear Waste Program

GPD:ch

- cc: Ellen Mattlin, USDOE
- Dave Einan, EPA
- Scott Luke, RFSH
- Jon Remaize, B&W
- Mary Lou Blazek, ODOE
- Administrative Record: 300 Area Waste Acid Treatment System (WATS),
300-FF-2 & 300-FF-5

Attachment 5

**Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
Federal Building, Room 590A
Richland, Washington**

**Meeting Held March 5, 1998
From 3:30 PM to 4:00 PM**

Ecology Letter:

**Lead Regulatory Agency for 200 Area Canyons and 100/300/400/600 Area
Facilities**

(3 pages including cover page)



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1115 W. 4th Avenue • Kennewick, Washington 99116-6018 • (509) 745-7581

45673
11/12/96

September 30, 1996

Ms. Linda McClain
Environmental Restoration Assistant Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Ms. McClain:

Re: Lead Regulatory Agency for 200 Area Canyons and 100/300/400/600 Area Facilities

This letter transmits an agreement between the Washington State Department of Ecology (Ecology) and the Environmental Protection Agency (EPA) for clarifying the Lead Regulatory Agency (LRA) for facilities on the Hanford Site once in the EM-40 Program, Environmental Restoration, of the U.S. Department of Energy (USDOE). Amendment Six of the Hanford Federal Facility Agreement and Consent Order, also known as the Tri-Party Agreement (TPA), under Article XXIV and Section 5.6, discusses the framework regarding LRA for operable units, treatment, storage, and disposal (TSD) groups/units, or milestones. It does not address facilities. In general, Ecology is the LRA for all TSD's, and will conduct inspections as necessary.

Facilities in the EM-60 Program, Facility Transition, are Ecology lead facilities, irrespective of location in operable units. Upon successful transition to the EM-40 Program, the LRA for the facilities will be as follows:

Ecology will be the LRA for the following facilities:

1. 200 Area: B Plant, PUREX, T Plant, and any other facility in Ecology Lead Operable Units identified in Appendix C.
2. 100 Area: D Reactor, DR Reactor, H Reactor, N Reactor, and any other facility in Ecology Lead Operable Units identified in Appendix C.
3. 300 Area: All facilities.
4. 400 Area: All facilities.

Ms Linda McClain
September 30, 1996
Page 2

5-600 Area: All facilities

EPA will be the LRA for the following facilities:

1. 200 Area: PFP (Z Plant), REDOX (S Plant), and any other facility in EPA Lead Operable Units identified in Appendix C.
2. 100 Area: B Reactor, BC Reactor, KE Reactor, KW Reactor, F Reactor, and any other facility in EPA Lead Operable Units identified in Appendix C.

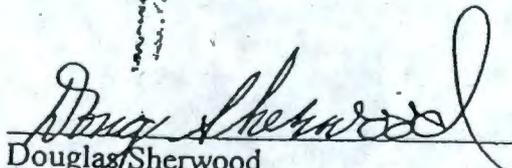
Dual Regulatory Agency for the following facility:

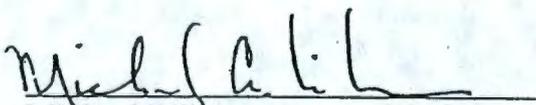
1. 200 Area: U Plant (Due to the canyon initiative)

As USDOE proceeds with Surveillance and Maintenance, Decommissioning & Decontamination, and demolition, identification of the appropriate LRA will ensure clear communication for regulatory reviews and approvals. This is consistent in keeping with the commitments from all parties in implementing the single regulatory concept.

Should you or your staff have any questions, please contact EPA at (509) 376-9529 or Ecology at (360) 407-7150.

Sincerely,


Douglas Sherwood
Environmental Protection Agency
Hanford Project Manager


Michael Wilson
Washington State Department of Ecology
Nuclear Waste Program Manager

DS:MW:JD:sb

cc: Jeff Bruggemen, USDOE
Jim Goodenough, USDOE
Rich Holten, USDOE
Jerry McGuire, BHI
Jim Rugg, BHI
Mary Lou Blazek, ODOI