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Meeting Minutes Transmittal

325 HAZARDOUS WASTE TREATMENT UNITS  
Project Managers Meeting  
Ecology - Kennewick Office, Room 8  
Kennewick, Washington

January 11, 1996  
2:00 p.m. to 3:00 p.m.

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

*Charles R. Delannoy* Date: 3/7/96  
Charles R. Delannoy, Project Manager, RL

*Jeanne J. Wallace* Date: 3/7/96  
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

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325 Hazardous Waste Treatment Unit, PNL Concurrence

*Glenn T. Thornton* Date: 3-7-96  
Glenn T. Thornton, Contractor Representative, PNL

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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 - Ecology Rough DRAFT Comments on 325 HWTU Part B Permit Application, WORKING DRAFT, Rev. 1.



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Attachment 1

325 HAZARDOUS WASTE TREATMENT UNITS  
Project Managers Meeting  
Ecology Kennewick Office, Room 8  
Kennewick, Washington

January 11, 1996  
2:00 p.m. to 3:00 p.m.

Agenda

1. Approval of Past Project Managers Meeting Minutes (Ecology/RL/PNL)
2. Diversion from RPS to RLWS (PNL/RL)
3. 325 HWTUs Part B Permit Application, WORKING DRAFT, Rev. 1 (Ecology/RL/PNL)
  - Document Status (RL/PNL)
  - Part B Application Development (Ecology/RL/PNL)
    - Discuss timing and scheduling of workshop sessions
4. Hanford Facility Dangerous Waste Permit Application, General Information, DOE/RL-91-28
5. Status of 325 HWTUs NOI Part A for Tank Storage (RL/PNL)
6. Closeout of Silver Letter Response Items (RL/PNL)
7. Status of Action Items (Ecology/RL/PNL)
  - 11-08-95:2 Administrative withdrawal of 3100 portion of the HWTU Part A, as requested in May 18, 1994 letter to RL  
ACTION: M Schlender/H Tilden (PNL)  
OPEN
  - 12-07-95:1 Use of metric/english measurements in documents  
ACTION: B. Day(PNL)/b. Delannoy (RL)  
OPEN
8. General Discussion (Ecology/RL/PNL)
9. New Action Items
10. Next Project Managers Meeting (Ecology/RL/PNL)
  - Next Meeting February 1, 1996  
337 Building, Mt. Hood
  - Proposed topics

## Attachment 2

325 HAZARDOUS WASTE TREATMENT UNITS  
PROJECT MANAGER MEETING  
Ecology Kennewick Office, Room 8  
Kennewick, Washington

January 11, 1996  
2:00 p.m. to 3:00 p.m.

## Summary of Discussion and Commitments/Agreements

1. **Approval of Past Project Manager Meeting Minutes:** The December 7, 1995 Project Manager Meeting Minutes (PMM) were approved by Ecology and RL Project Managers.

6. **Closeout of Silver Letter response items:** This item was brought up out of order since some participants were delayed. H. Tilden, PNNL, provided J. Wallace, Ecology, with three forms addressing three different issues: one was for J. Wallace-disposal from LSLII facility, the second for Greta-simulated high level waste slurry, and the third for Moses-site wide treatment by generator, all of Ecology. J. Wallace with pass them on to the appropriate staff and will give H. Tilden her comments on the first three she received. Basically the first three did not provide enough specific information.

2. **Diversion form RPS to RLWS:** B. Day, PNNL, reported the problem turned out to be a hardware problem and that a solder in one of the diverter modules needed to be re-soldered. Since the January 3, 1996 repair here have been no more problems. W. Larson, PNNL, stated it was an electronic problem.

3. **325 HWTUs Part B Permit Application, WORKING DRAFT, Rev. 1:** J. Wallace, Ecology, provided Rough DRAFT comments (Attachment 5) from various chapters. She has not completed her review.

D. Saueressig, WHC, provided a new schedule for the NOI, Part A, and Part B WORKING DRAFT. All dates are dependent on when Ecology provides formal comments. Ecology is scheduled to provide formal comments by mid-February. To stay on schedule Ecology comments will need to be submitted on time. J. Wallace, Ecology, stated she has been working on the comments and if she does not have a finished product by February 16, 1996, she will at least provide enough to start the workshops so things won't get held up. D. Saueressig, WHC, pointed out that the workshops are scheduled to start in March. The first workshop will address most of the chapters easiest to take care of so that would give Ecology until mid-April before the workshops get into the meat of the document.

4. **Hanford Facility Dangerous Waste Permit Application. General Information, DOE/RL-91-28:** H. Tilden, PNNL, reported that there was not status change from last meeting. It is at Ecology for review. There may be a couple of more weeks available in the schedule for reviewing the general information portion since there is interest in letting the Mod-B go until the contractor change as of October 1, 1996.

5. **Status of 325 HWTU NOI Part A for Tank Storage:** J. Wallace, Ecology, indicated there were no major problems with the NOI.

7. **Status of Action Items:**

11-08-95:2 Administrative withdrawal of 3100 portion of the HWTU Part A, as requested in May 18, 1994 letter to RL.  
ACTION: M. Schlender/H. Tilden (PNNL)  
It was unknown if the letter had gone out. H. Tilden, PNNL, knew it had been drafted and had the editor's approval but did not status it before the meeting.

12-07-95:1 Use of metric/English measurements in documents  
ACTION: B. Day (PNNL)/C. DeLannoy (RL)  
Under DOE direction all DOE documents are to be in metric. J. Wallace, Ecology, said it would speed things up to include both metric and English conversions. It would help to include a conversion table in the documents. It was agreed to include a table in DOE documents.

8. **General Discussion:** Some discussion was held again on agenda item number 6 for a couple of participants who came in late.

D. Lutter, PNNL, had seen a Hanford document for metric conversion and will get one for Ecology.

Discussions were on the Mod-B again and its potential impact on the schedule for HWTU's Part B. Nothing's been settled on the Mod-B as to whether it will slip or not. It's too early to tell.

J. Wallace, Ecology, wanted to know if there had been any progress in deciding if a tank was going to be put in the basement of 325. G. Thornton, PNNL, stated it was still being worked on.

G. Thornton, PNNL, wanted to know if there was a precedence or format for the workshops. B. Day, PNNL, indicated the workshops were fairly informal. Everyone's comments are looked at a decision is made by going one by one. If more information was needed, a person was assigned an action to get the information. Once all the decisions had been made there was the signing off for completion.

9. **New Action Items:**

01-11-96:1 Obtain a copy of "Metric Conversion Aids" for J. Wallace, Ecology  
ACTION: D. Lutter, PNNL

10. **Next Project Managers Meeting**

- February 1, 1996  
Mt. Hood, 337 Building, 2nd Floor  
Richland, Washington
- Proposed topics: NONE



## Attachment 4

325 HAZARDOUS WASTE TREATMENT UNITS  
Project Managers Meeting  
Ecology - Kennewick Office  
Room 8  
Kennewick, Washington

January 11, 1996  
2:00 p.m. to 3:00 p.m.

## Action Items

<u>Action Item#</u>	<u>Description</u>
11-08-95:2	Administrative withdrawal of 3100 portion of the HWTU Part A, as requested in May 18, 1995 letter to RL ACTION: M. Schlender/H. Tilden (PNL)
12-07-95:1	Use of metric/English measurements in documents. ACTION: C. Day (PNNL)/C. DeLannoy (RL) CLOSED 1/11/96
01-11-96:1	Obtain a copy of "Metric Conversion Aids" for J. Wallace (Ecology) ACTION: D. Lutter (PNNL)

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Attachment 5

325 HAZARDOUS WASTE TREATMENT UNITS  
Project Managers Meeting  
Ecology - Kennewick Office  
Room 8  
Kennewick, Washington

January 11, 1996  
2:00 p.m. to 3:00 p.m.

Ecology ROUGH DRAFT comments on 325 HWTU Part B Permit Application, WORKING  
DRAFT, Rev.1

325 Hazardous Waste Treatment Units  
(M-20-20 or T-3-4)  
Part B Working Draft Notice of Deficiency  
Submitted November 16, 1995 Review due February 16, 1995

DRAFT  
11/19/96 PMM

**Chapter 1.0, Part A Application**

Not available for review due to pending Notice of Intent. NOI submitted 11/28/95.

**Chapter 2.0, Facility Description and General Provisions**

Page 2-1, line 17. The location of Room 201A is not apparent from the text nor the figures provided.

Page 2-1, line 29 - 33. This portion of the text is contrary to the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste (hereafter referred to as the Hanford Facility Permit). The Hanford Facility Permit defines "dangerous waste" as solid wastes designated under Chapter 173-303 WAC as dangerous or extremely hazardous waste. As used in the Permit, the work "dangerous waste" shall refer to the full universe of wastes regulated by Chapter 70.105 RCW and Chapter 173-303 WAC (including dangerous waste, hazardous waste, extremely hazardous waste, mixed waste and acutely hazardous waste).

Page 2-1, line 40 - 47. The text should be revised to explicitly explain that the entire 325 Building is not a Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) unit. For example, in addition to the TSD portions of the building, activities occur in the other portions of the building which are beyond the scope of this permit.

**2.1.2 Hazardous Waste Treatment Unit**

Page 2-2

**Chapter 6.0, Procedures To Prevent Hazards**

Page 6-1, line 20. This section fails to present information regarding surveillance of the HWTU units. Surveillance to control access to these ...

Two populations need to be address, first the general public and second, non-TSD personnel access to the TSD portions of the building in light of the fact other non-TSD activities are conducted in the building.

Page 6-1, line 32. The plan states that the 325 Building is controlled through the use of locked entrances. In several visits to the building, access has been controlled by the receptionist at the front entrance. Please confirm if building or just portions of the building are locked to control access.

Page 6-1, line 32. The plan states that room 201 in the SAL has a cypher lock entry. Several questions arise in regard to this statement. First, is access to the other portions of the SAL through only room 201? Explain the rationale for the one cypher lock in the SAL. Second, it is unclear how response personnel would gain timely access the SAL via PNL Security in the event of an emergency. Is this addressed elsewhere in the permit? Third, do the SAL and HWTU have the same access control systems (i.e., cypher locks). Describe the other mechanisms and the rationale for using various access control devices in specific areas.

Page 6-1, line 41. The last sentence is unclear as written. Please revise sentence to clarify if, or if not, public has access to the HWTU's.

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Page 6-2, line 8 44. It would be helpful to include a figure to list the various types of inspections (daily, weekly, etc.), personnel performing the various inspections, the general scope of each inspection, and tracking mechanisms.

Tank (and ancillary equipment) inspection requirements have been omitted from the discussion WAC.173-303-640(6).

Page 6-2, line 28. It is unclear why it is proposed to conduct daily inspections whenever waste packaging, transfer, shipping, or movement operations are conducted. The SAL and HWTU treat and store waste. Basing the inspection schedule on that criteria presented may significantly reduce the frequency to a level which could lead to deterioration of containers, etc.

Estimate frequency if inspections were conducted based on criteria presented (i.e., average daily inspections per year (365 days)).

The regulations refer to "operating day". I would interpret this to mean waste management activities including treatment, and storage. It is unclear why "shipping" type activities were chosen basis for conducting inspection. Although this is a good time to inspect, it should not be the only. Explain the rationale.

Page 6-2, line 40. Specify for both the SAL and the HWTU if daily inspections will be recorded on forms or logbooks. If both forms of documentation will be utilized explain the need for both and streamlining efforts to perform task.

Specify if SAL and HWTU TSD personnel conduct daily and weekly inspection. The plan refers only to "personnel".

Describe line management in relation to other building and organizational

#### Chapter 11.0, Closure and Financial Assurance.

Page 11-1, line 6. Revise last sentence of paragraph to state, something like; Postclosure activities are not expected to be required because of the HWTU design. But in the event that the HWTU can not be decontaminated or removed then Postclosure permit will be submitted.

Page 11-1, line 20. Please elaborate on the design and operations which will prevent releases to soil and groundwater.

This paragraph needs revision to clarify meaning. Residual contamination may exist within the HWTU which leads to modified or postclosure care regardless of external contamination.

If an owner or operator has a tank system (a dangerous waste storage or treatment tank and its associated ancillary equipment and containment system) that does not have secondary containment that meets the requirements of 640(4) (b) through (f) then the tank system closure plan must include both a removal and decontamination plan, and a contingent post-closure plan ... for the purposes of contingent closure and post-closure such a tank system shall be considered to be a landfill. [Derived from WAC 173-303-640(8)].

A tank system may obtain a variance from the containment and detection of releases WAC 173-303-640 (4) via a demonstration described in 640 (4) (g). This demonstration has not occurred.

II.K.4. For any TSD unit which Conditions II.K.1 [clean], II.K.2 [background], or II.K.3 [modified], are not chosen as the closure option, closing the TSD unit as a landfill may be selected. Closure and

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postclosure of the TSD unit as a landfill must follow the procedures and requirements specified in WAC 173-303-610.

Page 11-1, line 28. There appears to be a repeat phrase in this sentence. Please revise.

Page 11-1, line 34. Please provide discussion of expected life expectancy of the HWTUs. Explain if the HWTUs will discontinue operation prior to closure of the building. Present drivers will determine the continued operation of the TSD units.

Fails to address closure of entire building.

Page 11-1, line 39. This paragraph is incorrect and must be removed from the closure plan for this unit.

Owners and operators of regulated units at which waste will remain after closure, to tanks systems that are required to meet landfill requirements, ... all facilities which at closure, cannot meet the removal and decontamination limits specified in subsections (2) (b) of WAC 173-303-610 are subject to postclosure care.

610(1)(b)

At closure, all dangerous waste and dangerous waste residues must be removed from the containment system. Remaining containers, liners, bases, and soil containing or contaminated with dangerous waste or dangerous waster residues must be decontaminated or removed. 630(10)

\*Spills or leaks form the unit into the environment shall be managed as regulated unit

\*The description must identify the maximum extent of the operation which will be unclosed during the active life of the facility. 610 (3)(a)(ii)

As applicable to the tank system of the unit if

If an owner or operator has a tank system (a dangerous waste storage or treatment tank and its associated ancillary equipment and containment system) that does not have secondary containment that meets the requirements of 640(4) (b) through (f) then the tank system closure plan must include both a removal and decontamination plan, and a contingent post-closure plan ... for the purposes of contingent closure and post-closure such a tank system shall be considered to be a landfill. [Derived from WAC 173-303-640(8)].

Corrective Action, 610(3)(a)(iii) & (v)

Page 11-1, line 46. This paragraph is not consistent with the Dangerous Waste Regulations and must be removed from the closure plan. For all structures, equipment, bases, liners, etc., clean closure standards shall be set by the department (of ecology) on a case-by-case basis in accordance with the closure performance standards of WAC 173-303-610(2)(a)(ii) and in a manner that minimizes or eliminates post closure escape of dangerous waste constituents. 610(2)(b)(ii)

WAC 173-303-610 (5) Disposal or decontamination of equipment, structures and soils. During the partial and final closure periods, all properly disposed of or decontaminated unless otherwise specified. By removing and dangerous wastes or dangerous constituents during partial and final closure, the owner or operator may become a generator of dangerous waste and must handle that waste in accordance with all applicable requirements of WAC 173-303-170 through 230.

WAC 173-303-640(8)(b) If the owner or operator (of a tank system) demonstrates that not all contaminated soils can be practicably removed or decontaminated as required in (a) of 640 then the

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ADMINISTRATIVE RECORD (Two Copies): 325 Hazardous Waste Treatment Unit, T-3-4  
[Care of EDMC, WHC (H6-08)]

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Please send comments on distribution list to D. K. Lutter (P7-79), (509) 376-5631.