Meeting Minutes

0048632

B Plant Project Managers Meeting
MO-414/200 East Area
January 29, 1998
9:00 a.m. - 11:00 a.m.

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

_____ Date: 19 FEB '98
Gregory J. LeBaron, B Plant Contractor Representative, BWHC

David T. Evans _____ Date: 2/19/98
David T. Evans, Project Manager, DOE-RL

_____ Date: 2/19/98
Ted A. Wooley, Project Manager, Washington State Department of Ecology

George W Reddick _____ Date: 2/19/98
George W. Reddick, PHMC Representative, FDH

DID NOT ATTEND--NO SIGNATURE REQUIRED

_____ Date: _____
Cindy Grant, WDOH Representative

Agenda: The agenda for the January 29, 1997 meeting included the following B Plant Facility Transition topics:

1) Approve Minutes from Previous Project Managers Meeting
2) WESF Tank 100 SAF/SAP
3) Discuss Closure of Organic Storage Area Proposal
   Administrative Closure
   Removing the Unit from the Part A Permit
4) Vessel Deactivation Update
5) Status of the Lead Blanket Proposal
6) W-059 Project Update
7) Gallery Exhauster Shut Down
8) Review Action Items
9) Other Items
10) Set date for February PMM

DISTRIBUTION:

R. M. Carosino	RL	A4-52*
C. E. Clark	RL	A5-15*
D. T. Evans	RL	R3-79
S. D. Godfrey	BWHC	S4-49
R. X. Gonzalez	RL	R3-79*
R. E. Heineman	BWHC	S4-49*
A. M. Hopkins	FDH	N1-26*
M. N. Jaraysi	Ecology	B5-18*
G. J. LeBaron	BWHC	S6-15*
E. M. Mattlin	RL	A5-15*
J. E. Mecca	RL	R3-79*
M. D. Olsen	BWHC	H5-31*
G. W. Reddick	FDH	N1-26
C. D. Sorensen	BWHC	R3-56*
M. J. Stephenson	FDH	H6-22*
T. A. Wooley	Ecology	B5-18

*Distribution via cc:mail w/o Attachments

ADMINISTRATIVE RECORD [B Plant TS-2-3]: EDMC 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-070 (Records Center)

Cindy Grant, Washington State Department of Health, 1511 3rd Avenue, Suite 700, Seattle, Washington 98101

Please send comments on distribution list to Greg LeBaron, BWHC (S6-15), (509) 373-1792 or Steve Godfrey, BWHC (S4-49), (509) 372-0501.

B Plant Project Managers Meeting
MO-414 Conference Room
Richland, Washington

January 29, 1998
9:00 a.m. - 11:00 a.m.

SUMMARY OF DISCUSSION AND COMMITMENTS/AGREEMENTS

Approve Minutes from Previous Project Manager Meeting

Mr. Ted Wooley, Washington State Department of Ecology (Ecology); Mr. Dave Evans, Department of Energy, Richland Operations Office (RL); Mr. George Reddick, Fluor Daniel Hanford, Inc. (FDH); and Mr. Greg LeBaron, B&W Hanford Company (BWHC) approved and signed the meeting minutes from the December 11, 1997 B Plant Project Managers Meeting. Ms. Cindy Grant, Washington State Department of Health (WDOH), was not able to attend this meeting, her signature will not be required. The minutes were sent out prior to the meeting for review and all corrections were incorporated prior to approval.

WESF Tank 100 SAF/SAP

Mr. Tom Beam (BWHC) presented a brief overview of the history of Tank 100 and its use at the B Plant and WESF facilities (attached). Because Tank 100 is being removed and replaced, plans for sampling and disposal are being prepared. The Sampling Authorization Form (SAF) and Sampling Diagram were also distributed (attached) and copies of the following Sampling Plans were given to Mr. Wooley:

WHC-IP-1127 5.2 Rev 1	- Drum Sampling Procedure
SML-EP-001 2.5 Rev 0	- Laboratory Cleaning of Sampling Equipment
SML-EP-001 2.1 Rev 0	- Bottle Preservation
SML-EP-001 1.5 Rev 0	- Field Logbooks
SML-EP-001 1.3 Rev 0	- Control of Certificates of Analysis
SML-EP-001 1.2 Rev 0	- Project and Sample Identification for S&ML
SML-EP-001 1.1 Rev 0	- Chain of Custody/Sample Analysis Request.

Based on historical use of the tank, it is expected the tank contains low level rad waste only with no chemical or dangerous characteristics. However, to provide a high level of assurance, sampling and analysis will be performed per RCRA protocol. To ensure that representative results are obtained, three samples of the solid/sludge and one composite liquid sample will be collected through nozzles located on the top of the tank. The sample results will be shared with Ecology when available. Sampling by Mobile Labs is scheduled for February 4, 1998.

Closure of Organic Storage Area Proposal

Mr. Greg LeBaron (BWHC) requested copies of cc:mail correspondence between Ecology and BWHC regarding this proposal be submitted and attached to the meeting minutes (attached).

Mr. Jason Adler (WMH) presented the proposal for the organic storage area closure. Outlines of the proposed documents and schedules were provided for both the administrative closure of the ISO West Organic Storage Tank (in which dangerous waste was never stored) and for closure of the 276-BA Interim Organic Storage Tank (attached). Mr. Wooley will review the document outlines to make sure they are complete **(ACTION: PMM-BP-98-1)** and Mr. Adler will provide a list of the documents that will be used to support the administrative closure so they can be reviewed as the administrative closure documentation is being prepared **(ACTION: PMM-BP-98-2)** since the task is on such a tight schedule.

In order to administratively close the unused vessel to meet the schedules for the project, documents requiring signature approvals from RL, FDH, and Ecology will have to be hand carried. Mr. Ted Wooley (Ecology) will verify the need for PE stamp on an administrative closure. **(ACTION: PMM-BP-98-3).** Mr. Steve Godfrey (BWHC) will provide a date by when the tank is needed to meet the project milestone **(ACTION: PMM-BP-98-4).**

There was discussion regarding modifying the B Plant Part A to remove reference to the ISO Organic Storage Tanks. Mr. Kent Smith (BWHC) proposed contracting out the steam cleaning service. The final cost will need to be determined to manage this plan and schedule.

Vessel Deactivation Update/W-059 Project Update/Gallery Exhauster Shut Down
(These three agenda items were discussed together)

Vessel Deactivation Update: Mr. Greg LeBaron reported that decontamination work in the B Plant canyon will be concluded the end of next week, February 6, 1998. Work has been delayed because of clothing contamination events.

W-059: Plans for entering the B Plant canyon with the new Cell 10 cover block and internal ducting has been set for February 9, 1998.

Gallery Exhauster Shut Down: It is scheduled to shutdown the gallery exhauster fans within the March/April timeframe. Mr. LeBaron will update progress to Ms. Cindy Grant (WDOH) **(ACTION: PMM-BP-98-5).**

Status of Lead Blanket Proposal

Mr. Steve Godfrey (BWHC) provided the B Plant Lead Inventory status as of December, 1997 (attached). Because of small amount of lead that would be removed in comparision to the total amount in the building, the radiation exposure to employees, and the cost associated for removal, it was proposed to leave the lead blankets in the canyon. Documentation regarding total inventory of lead and other dangerous wastes left in B Plant will be developed for whoever decommissions the facility. Mr. Ted Wooley (Ecology) expressed his concern regarding the B Plant Canyon becoming an "above ground landfill". Mr. Godfrey will establish a specific End Point for Lead Documentation, to include inventory and location **(ACTION: PMM-BP-98-6).**

Other Items

- Mr. Wooley requested the End Point document be released for Public Review. Mr. Godfrey will arrange for the release **(ACTION: PMM-BP-98-7).**

OPEN OR RECENTLY CLOSED ACTION ITEMS

Action Item	Responsible Person	Description	Completion Date
PMM-BP-97-12	Steve Godfrey-BWHC	Address and resolve issue of insufficient information to adequately identify remaining hazards on B Plant End Point Closure letters.	OPEN
PMM-BP-97-14	Ted Wooley-Ecology	Ecology approval of End Point Document.	CLOSED 01/98
PMM-BP-97-16	Ted Wooley-Ecology	Review the proposal for closing the organic storage area and communicate comments to Greg LeBaron-BWHC	CLOSED 01/98
PMM-BP-97-17	Greg LeBaron-BWHC	Transmit proposal for closing organic storage area to Ecology after comments are incorporated	OPEN
PMM-BP-97-18	Fen Simmons BWHC	Provide a description to Ecology of solids in vessels and how they will be sampled.	CLOSED 01/98
PMM-BP-97-19	Ted Wooley-Ecology	Verify to Fen Simmons for the SAP that spike duplicates and triplicate TOCs are not needed	CLOSED 01/98
PMM-BP-97-20	Ted Wooley-Ecology	Review B Plant WAP and provide comments	OPEN
PMM-BP-97-21	Steve Godfrey-BWHC	Provide a copy of the SAF for Tank 100 sampling to Ecology	CLOSED 01/98
PMM-BP-98-1	Ted Wooley-Ecology	Review the closure document outlines to make sure they are complete	
PMM-BP-98-2	Jason Adler-WMH	Provide a list of the documents to be used to support administrative closure	
PMM-BP-98-3	Ted Wooley-Ecology	Evaluate need for PE stamp for administrative closure of the ISO West Organic Storage Tank	

Action Item	Responsible Person	Description	Completion Date
PMM-BP-98-4	Steve Godfrey (BWHC)	Provide need date for the ISO West Organic Storage Tank closure to meet project milestones	
PMM-BP-98-5	Greg LeBaron (BWHC)	Update Ms. Cindt Grant (WDOH) on the progress of Gallery Exhauster Shut Down	
PMM-BP-98-6	Steve Godfrey (BWHC)	Establish a specific end point to document lead inventory and location	
PMM-BP-98-7	Steve Godfrey (BWHC)	Arrange for the B Plant end point document to be publicly released	

Only open items and those which have been closed since approval of the last meeting minutes will be listed.

SCHEDULING OF NEXT MEETING

The next B Plant Project Managers Meeting is scheduled for February 19, 1998 at the Kennewick Ecology Office, from 8:00 am to 10:00 am.

January 29, 1998 ATTENDEE LIST

NAME	ORGANIZATION	PHONE NUMBER
Jason Adler	Waste Management	376-7513
Tom Beam	BWHC	372-0019
Dave Evans	RL-TPD	373-9278
Steve Godfrey	BWHC	372-0501
Pam Laughery	BWHC	372-0102
Greg LeBaron	BWHC	373-1792
George Reddick	FDH	376-2326
Kent Smith	BWHC	372-0000
Kimberly Williams	RL-TPD	373-1646
Ted Wooley	Ecology	736-3012

WESF LLLW DECOUPLING TANK 100 HISTORY/USE

- Operational since startup (~20 years)
- Relatively low generation quantities
- Managed as low level rad waste
- Facility chemical use researched
- No chemical/dangerous characteristics expected
- Sampling to facilitate disposal of tank/waste

WESF LLLW DECOUPLING TANK 100 SAMPLING

- Sampling Authorization Form (SAF)
- Sampling and Mobile Labs Procedures
- Facility Work Plan and Sampling Diagram
- Sampling scheduled for February 4, 1998
- Analysis Cost ~$70k

SAMPLING AUTHORIZATION FORM

- 3 solid/sludge samples
- 1 liquid sample
- Analytes
- Testing Methods
- QC Levels

SAMPLING AND MOBILE LABS PROCEDURES

- Sample Collection
  - RCRA Protocol
- Chain of Custody
- Equipment
- Records

WESF WORK PLAN AND SAMPLING DIAGRAM

- Sample through tank nozzles
  - accessibility
- 3 solid/sludge samples
  - locations
- 1 liquid sample
  - composite

XMP 1/8/98

Waste Management Hanford
SAMPLING AUTHORIZATION FORM

SAF Number: R98-022 Rev: 0

Program Type Other
Project Type Other
Task ID 0

Project ID WESF
Operable Unit N/A
Round Number 0

SAF Title WESF TANK 100 - Sludge

Task Manager Brist, LD
Requester Brist, LD

Charge Codes-
Sample Management KN0E0

Project Coordinator Pool, KN

Estimated Start Date 01/05/98
Estimated Completion Date 01/30/98

SampleArea 200 East
Estimated Number of Samples 3

Sampling Organizations
WMNW

Laboratory/Turnaround/Data Deliverable
Primary: 222-S Lab Operations/ 30 Days/Summary
Primary: Special Analytical Servic/ 30 Days/Summary

Matrix Other Solid

SAF Comment

222-S will use equivalent laboratory procedures for the referenced methods.
For IC and all Rad Analyses, Routine Process Quality Control to be applied.

COC Comments

Deliver Summary Data Deliverable to Sandy Walls 30 Days from receipt.
Please fax sample receipt documentation to S.Walls 24 hours from receipt.
SAS:****VOA Method : TBD Constituent under 8260 is for Methanol 67-56-1, Use current promolgated method*******

Date 01/08/98

SAF Status: Final

7dnp 118/98

Waste Management Hanford

Field Sampling Requirements

Laboratory Analysis

Laboratory: **222-S Lab Operations**

Matrix: **Other Solid**

Parameter / Analysis	Reference Method	Container / Volume	VolReq	Preservation	Holding Times
Pest/PCBs - 8080 (TCL) Aroclor-1016, Aroclor-1221, Aroclor-1232, Aroclor-1242, Aroclor-1248, Aroclor-1254, Aroclor-1260	EPA8080	G 35 g	Full QC	None	14/40 Days
IC Anions - 300.0 Chloride, Fluoride, Nitrogen in Nitrate, Nitrogen in Nitrite, Phosphate, Sulfate	EPA300.0		Full QC		28 Days/48 Hours
Metals by ICP (TCLP) - 1311/6010 Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver	EPA1311/6010A		Full QC		180/360 Days
Mercury (TCLP) - 1311/7470 Mercury	EPA1311/7470		Full QC		28/56 Days
Gross Alpha Gross alpha	GA		Full QC		6 Months
Gamma Spectroscopy Cesium-137	GAMMA		Full QC		6 Months
Strontium-89,90 -- Sr-90 Strontium-90	SR8990		Full QC		6 Months
Rad Screen No CAS	RADSCREEN		Full QC		ASAP

Key to Container Types

G = Glass
Gs = Glass w/septum cap
Gs* = Glass w/septum cap - no head space in container
P = Plastic (Polyethylene)
aG = Amber Glass
aGs = Amber Glass w/septum cap
aGs* = Amber Glass w/septum cap - no head space in container

FSR Comment:

XRP 1/8/98

Waste Management Hanford

Field Sampling Requirements

Laboratory Analysis

Laboratory: Special Analytical Servic

Matrix: Other Solid

Parameter / Analysis	Reference Method	Container / Volume	VolReq	Preservation	Holding Times
VOA - 8260A - Complete 1,1,1-Trichloroethane, 2-Butanone, Acetone, TBD	EPA8260A	G 40 ml	Full QC	Cool 4C	14 Days

Key to Container Types

G = Glass
Gs = Glass w/ septum cap
Gs* = Glass w/septum cap- no head space in container
P = Plastic (Polyethylene)
aG = Amber Glass
aGs = Amber Glass w/ septum cap
aGs* = Amber Glass w/septum cap- no head space in container

FSR Comment:

XW 1/8/98

Waste Management Hanford
SAMPLING AUTHORIZATION FORM

SAF Number: R98-023 Rev: 0

Program Type Other
Project ID WESF

Project Type Other
Operable Unit N/A

Task ID 0
Round Number 0

SAF Title WESF TANK 100 - Liquid

Task Manager Brist, LD
Requester Brist, LD

Charge Codes-
Sample Management KN3E0

Project Coordinator Pool, KN

Estimated Start Date 01/05/98
Estimated Completion Date 01/05/98

SampleArea 200 East
Estimated Number of Samples 1

Sampling Organizations
WMNW

Laboratory/Turnaround/Data Deliverable
Matrix Other Liquid

Primary: 222-S Lab Operations/ 30 Days/Summary
Primary: Special Analytical Servic/ 30 Days/Summary

SAF Comment

222-S will use equivalent laboratory procedures for the referenced methods.
For IC and all Rad analyses, Routine Process Quality Control to be applied.

COC Comments

Deliver Summary Data Deliverable to Sandy Walls 30 Days from receipt.
Please fax sample receipt documentation to S.Walls within 24 hours from receipt.
SAS: ******VOA Method: TBD Consituent for 8260 is Methanol 67-56-1, Use current promolgated method.*********

Date 01/08/98

JVP 1/8/98

Waste Management Hanford

Field Sampling Requirements

Laboratory Analysis

Laboratory: 222-S Lab Operations

Matrix: Other Liquid

Parameter / Analysis	Reference Method	Container / Volume	VolReq	Preservation	Holding Times
Pest/PCBs - 8080 (TCL)	EPA8080	G 125 ml	Full QC	None	14/40 Days
Aroclor-1016, Aroclor-1221, Aroclor-1232, Aroclor-1242, Aroclor-1248, Aroclor-1254, Aroclor-1260					
IC Anions - 300.0	EPA300.0		Full QC		28 Days/48 Hours
Chloride, Fluoride, Nitrogen in Nitrate, Nitrogen in Nitrite, Phosphate, Sulfate					
Metals by ICP (TCLP) - 1311/6010	EPA1311/6010A		Full QC		180/360 Days
Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, Silver					
Mercury (TCLP) - 1311/7470	EPA1311/7470		Full QC		28/56 Days
Mercury					
Gross Alpha	GA		Full QC		6 Months
Gross alpha					
Gamma Spectroscopy	GAMMA		Full QC		6 Months
Cesium-137					
Strontium-89,90 -- Sr-90	SR5990		Full QC		6 Months
Strontium-90					
Rad Screen	RADSCREEN		Full QC		ASAP
No CAS					

Key to Container Types

G = Glass
Gs = Glass w/ septum cap
Gs* = Glass w/septum cap
no head space in container
P = Plastic (Polyethylene)

aG = Amber Glass
aGs = Amber Glass w/ septum cap
aGs* = Amber Glass w/septum cap
no head space in container

FSR Comment:

XMP 1/9/98

Waste Management Hanford

Field Sampling Requirements

Laboratory Analysis

Laboratory: Special Analytical Servic

Matrix: Other Liquid

Parameter / Analysis	Reference Method	Container / Volume	VolReq	Preservation	Holding Times
VOA 8260A - Complete 1,1,1-Trichloroethane, 2-Butanone, Acetone, TBD	EPA8260A	Gs* 40 ml	Full QC	Cool 4C	14 Days

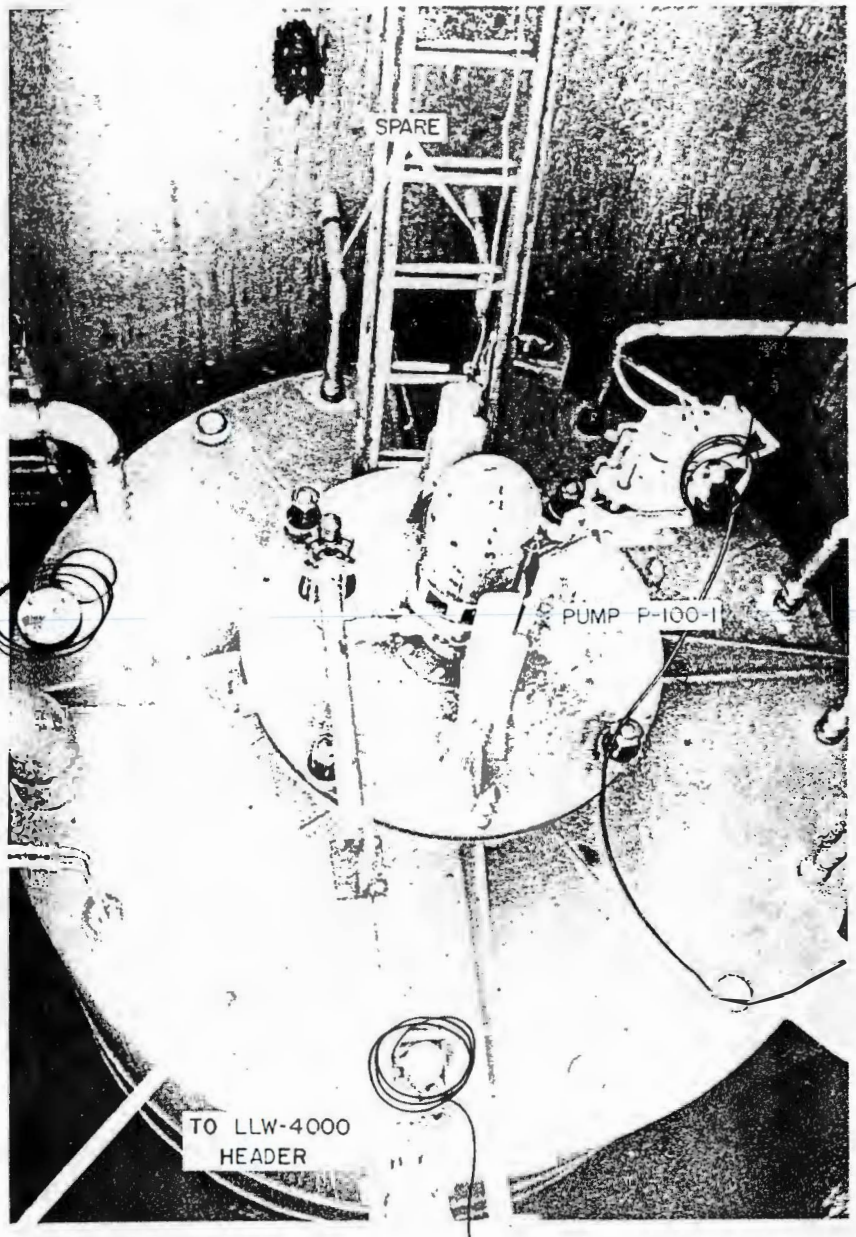
Key to Container Types

G = Glass
Cs = Glass w/ septum cap
Gs* = Glass w/septum cap- no head space in container
P = Plastic (Polyethylene)
aG = Amber Glass
aGs = Amber Glass w/ septum cap
aGs* = Amber Glass w/septum cap- no head space in container

FSR Comment:

TK-100

CATCH TANK



Sample Point C

K-1 FILTER BUILDING DRAIN

291-BE STACK DRAIN

K-3 FILTER PIT DRAIN

TK-100 VENT TO K-3 FILTER PIT

CDH DIVERSION

Sample Point A

225-B BUILDING FLOOR DRAINS

INSTRUMENTATION

TK-100 PIT SUMP JET

Sample Point B

Author: Gregory J LeBaron at ~HANFORD12B
Date: 1/23/98 10:54 AM
Priority: Normal
TO: Theodore A Wooley at ~HANFORD02A
CC: David T Evans at ~HANFORD04C
CC: Steven D (Steve) Godfrey at ~HANFORD04E
CC: Donald K (Kent) Smith at ~HANFORD11B
CC: George W Jr Reddick at ~EXCHANGE
CC: R X (Rick) Gonzalez at ~EXCHANGE
CC: Kimberly L Williams at ~HANFORD04A
CC: Gregory J LeBaron
Subject: B-Plant Organic Area Closure

---------- Message Contents ----------

After our discussions on the previous B-Plant organic area closure proposal, I have modified it to include your comments. Please review it and see if you can agree to it. I would like to include it in the next PMM minutes and show that we all agree that this is the direction we will be going so I can get the necessary documentation prepared and the the other activities taken care of to close the unit. We are quickly running out of time to get this done before the B-Plant people disappear.

Thanks for your offer to help expedite the NOC we will need. However, I have gone back to ask my people to make sure we have to do it. Also, we need to be thinking about ways to expedite the administrative items and documentation to make this happen in the time we have left for deactivation.

Thanks,

Greg

Organic Vessels and the Interim Organic Storage Facility (276-BA) Closure Proposal

Description: There are two vessels at the 276-BA Interim Organic Storage Facility northeast of the B-Plant in the 200 East area. The vessels were were added to the B-Plant Part A permit for storing dangerous and listed wastes. The east vessel was used to store radioactively contaminated, listed organic waste from the B-Plant process. No organic was ever placed or stored in the west vessel.

Proposal for Vessel Closure: The west vessel, in which organic was never placed or stored, will be closed administratively. A request for administrative closure will be prepared and sent to Ecology. Once approved, the vessel will no longer be subject to RCRA requirements and reference to the vessel will be removed from the Part A permit. The vessel can then be left at the location or moved to another location without RCRA concerns.

The east vessel, in which radioactive organic was stored, will be closed using a treatment standard from 40 CFR 268.45, Treatment Standards for Hazardous Debris. The treatment standard used will be High Pressure Steam from Table 1, Alternative Treatment Standards for Hazardous Debris. The treatment is a physical extraction applicable for metal. The high pressure steam is:

> "Application of ... steam sprays of sufficient temperature, pressure, residence time, agitation, surfactants, and detergents to remove hazardous contaminants from debris surfaces ..."

The performance standard for steam cleaning metal is to treat to a clean debris surface which is defined as:

> "\3\ ''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 discolorations, 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."

Residue from the steam cleaning will be transferred to drums or a truck and taken to a waste storage/disposal facility (eg. tank farms). Residual liquid in the bottom of the vessel would be absorbed with free liquids going to a liquid waste storage/disposal facility (eg. tank farms) and the solids going to a solid waste storage/disposal facility (eg. Central Waste Complex).

Once steam cleaned and the residual materials removed, the surface would be inspected to the "clean debris surface" criterium. The person performing the inspection will certify that the criterium is met and the vessel will no longer be subject to RCRA requirements and reference to the vessel will be removed from the Part A permit. The vessel can then be left at the location or moved to another location without RCRA concerns.

Note that in the proceeding activities, no sampling is performed. The "clean debris surface" is based on visual inspection and disposition of the residuals from steam cleaning are characterized based on the listed codes used to designate the organic.

Vessel cleaning may require air permitting.

Proposal for Storage Area Closure: A partial closure plan will be prepared for closure of the waste storage unit and reduction of the RCRA boundary in the Part A permit. The plan will cover all the required sections but it is anticipated that the plan will be short since the storage unit was constructed in 1996 and only one batch of well characterized waste was placed in the vessel on 25 February 1997, and removed in October 1997. During the less than 8 months the waste was in the vessel, the vessel and containment area was surveyed weekly to ensure there were no leaks or problems. Completion of the closure will depend on the ability of putting the plan in place and completing the identified activities in a cost effective and timely manner to coincide with the facility deactivation.

Since the dangerous components were intrinsic with the radioactive constituents of the waste, the containment area will be surveyed for radioactive contamination. If radioactivity is found, the contaminated area will be decontaminated using a treatment standard from 40 CFR 268.45, Treatment Standards for Hazardous Debris, such as grinding, spalling, drilling, chipping, etc. until no radiation is found. Solid wastes generated as a result of decontamination will be characterized based on the listed codes used to designate the organic and sent to a solid waste storage/disposal facility (eg. Central Waste Complex).

If no radioactive contamination is found or once any radioactive contamination is removed, the area will be considered clean, no longer subject to RCRA requirements, and reference to the area will be removed from the Part A permit. The containment area will then be left for other potential non-regulated activities or removed and sent to the landfill based on site clean-up plans and budgets. A professional engineer will certify closure.

Note that in the proceeding activities, no sampling is performed. The "clean debris surface" is based on radiation surveys and disposition of the residuals from decontamination, if required, are characterized based on the listed codes used to designate the organic.

Decontamination may require air permitting.

Author: Theodore A Wooley at ~HANFORD02A
Date: 1/23/98 4:22 PM
Priority: Normal
TO: Gregory J LeBaron at ~HANFORD12B
Subject: Re: B-Plant Organic Area Closure

---------- Message Contents ----------

I believe that conceptually the document that you sent has most of the information required for clean closing the waste tank and pad pursuant to RCRA. What Ecology will further require is detail surrounding the actual steam cleaning itself. In order to de-list the tank for F codes you will have to use the rinsate as the indicator. Either the concentration based treatment standard, or Method B ground water values (which ever is more conservative) will be used. Bottomline is that some analytical sampling will need to occur other than for just meeting boundary conditions for TWRS. tw

---------- Reply Separator ----------

Subject: B-Plant Organic Area Closure
Author: Gregory J LeBaron at ~HANFORD12B
Date: 1/23/98 10:54 AM

After our discussions on the previous B-Plant organic area closure proposal, I have modified it to include your comments. Please review it and see if you can agree to it. I would like to include it in the next PMM minutes and show that we all agree that this is the direction we will be going so I can get the necessary documentation prepared and the the other activities taken care of to close the unit. We are quickly running out of time to get this done before the B-Plant people disappear.

Thanks for your offer to help expedite the NOC we will need. However, I have gone back to ask my people to make sure we have to do it. Also, we need to be thinking about ways to expedite the administrative items and documentation to make this happen in the time we have left for deactivation.

Thanks,

Greg

Author: Gregory J LeBaron at ~HANFORD12B
Date: 1/27/98 1:02 PM
Priority: Normal
TO: Theodore A Wooley at ~HANFORD02A
CC: David T Evans at ~HANFORD04C
CC: George W Jr Reddick at ~EXCHANGE
CC: Steven D (Steve) Godfrey at ~HANFORD04E
CC: Gregory J LeBaron
Subject: Regulatory Basis for Use of the Debris Rule
---------- Message Contents ----------

Ted,

Attached is the regulatory basis for closure and use of the debris rule for closing the ISO east tank which stored a batch of organic mixed waste. The regulations state that "clean closure standards will be set by the department on a case-by-case basis" and steam cleaning is a method identified in the regulations for cleaning metal with a visual verification that it is clean. There is nothing in the regulations that limits the use of the method to characteristic waste.

Based on the intended follow-on use of the tank, to haul radioactive contaminated waster, there is really no benefit that further protects the environment or human health to even steam clean the vessel let alone to perform sampling. Both activities only take away resources from other clean up activities. However, in an interest of compromise, we will arrange to do the steam cleaning. And hopefully, in support of Ecology's commitment to work with DOE to make clean up more cost efficient, I hope that you will use your regulatory latitude to interpret the regulations, "... clean closure standards will be set by the department on a case-by-case basis ...", so we can close this vessel without sampling and move forward with this activity.

Time is now of the essence to even get this work done before the deactivation project is complete. The alternative is to leave the unit as permitted until it can be closed in conjunction with the rest of the plant. In the mean time, ETF will have to secure another vessel for their needs.

Thanks,

Greg

REGULATORY BASIS FOR USE OF DEBRIS RULE TREATMENT

Chapter 6.0 of the TPA allows for the use of WAC 173-303-610 for closing interim status treatment, storage, and disposal units.

The stated regulatory requirements are:

> WAC 173-303-610(2)(b)(ii) "For all structures, equipment, bases, liners, etc., clean closure standards will be set by the department 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"
>
> WAC 173-303-610(2)(a)(ii) Closure performance standard. The owner or operator must close the facility in a manner that "Controls, minimizes or eliminates to the extent necessary to protect human health and the environment, postclosure escape of dangerous waste, dangerous waste constituents, leachate, contaminated run-off, or dangerous waste decomposition products to the ground, surface water, ground water or atmosphere"

To summarize: The clean closure standards for equipment (ie, a tank) are set on a case-by-case basis by Ecology in a manner that protects human health and the environment.

Ecology's Publication #94-111 GUIDANCE FOR CLEAN CLOSURE OF DANGEROUS WASTE FACILITIES (Section 5.9) states that the treatment technologies in 40 CFR 268.45 Table 1 (ie, high pressure steam cleaning) can be used for the decontamination of metal tanks. Section 5.9 also states that the a 'clean debris surface' as defined within the guidance is the appropriate performance standard.

No limitation or restriction are in place for listed waste. Once the 'clean debris surface' standard is met the tank has been decontaminated and no longer subject to regulation. No additional sampling is required.

Any residue generated by the decontamination would continue to be managed as a listed waste.

Author: Theodore A Wooley at ~HANFORD02A
Date: 1/27/98 2:53 PM
Priority: Normal
TO: David T Evans at ~HANFORD04C
TO: Gregory J LeBaron at ~HANFORD12B
TO: Steven D (Steve) Godfrey at ~HANFORD04E
Subject: Tank closure at B Plant
---------- Message Contents ----------

Dave:

After speaking with Greg several times on how best to close the Iso tanks at B Plant, I have come to point of non-negotiation. The only way that Ecology will clean close the tank that has held waste is;

1) The tank must be decontaminated via the appropriate treatment standard (e.g., high pressure steam cleaning).

2) After the treatment has been performed the tank MUST PASS A VISUAL INSPECTION AND THE STEAM RINSATE MUST BE SAMPLED AND ANALYZED FOR THE CONTAMINANTS RESPONSIBLE FOR CODE ASSIGNMENT.

As discussed with Greg, EPA does not consider intact tanks as debris, thus any hazardous waste in the tank is subject to the waste-specific treatment standard not the debris standard. This means that meeting the "clean debris surface "performance standard will not exit the tank from RCRA. Intact tanks must meet a higher closure performance standard.

Please note that one sample could suffice for performing the delisting. Like Greg mentioned the regulations are not clear in this area. I agree, however Ecology must agree with the closure strategy.

If you feel that I am being unreasonable I would welcome a meeting with you, Greg, myself, Ron Skinnarland and whoever else in your shop that you want to involve.

ADMINISTRATIVE CLOSURE
OF THE ISO WEST ORGANIC STORAGE TANK

History of the ISO West tank

- Installed in 1996.
- Contingency tank for the external interim organic storage.
- Identified on the B Plant Part A.
- Has never stored waste.

Administrative Closure for the ISO West tank

- Prepare an administrative closure certification statement.
- Certification statement modeled on the procedural closures used for units that have never handled dangerous waste.
- Contents of administrative closure certification statement:

    1.0 Introduction
    2.0 Facility Description
    3.0 Process Information & History
    4.0 Summary
    5.0 Certification (by RL and FDH)

- Transmitted to Ecology after certification.

Ecology Action

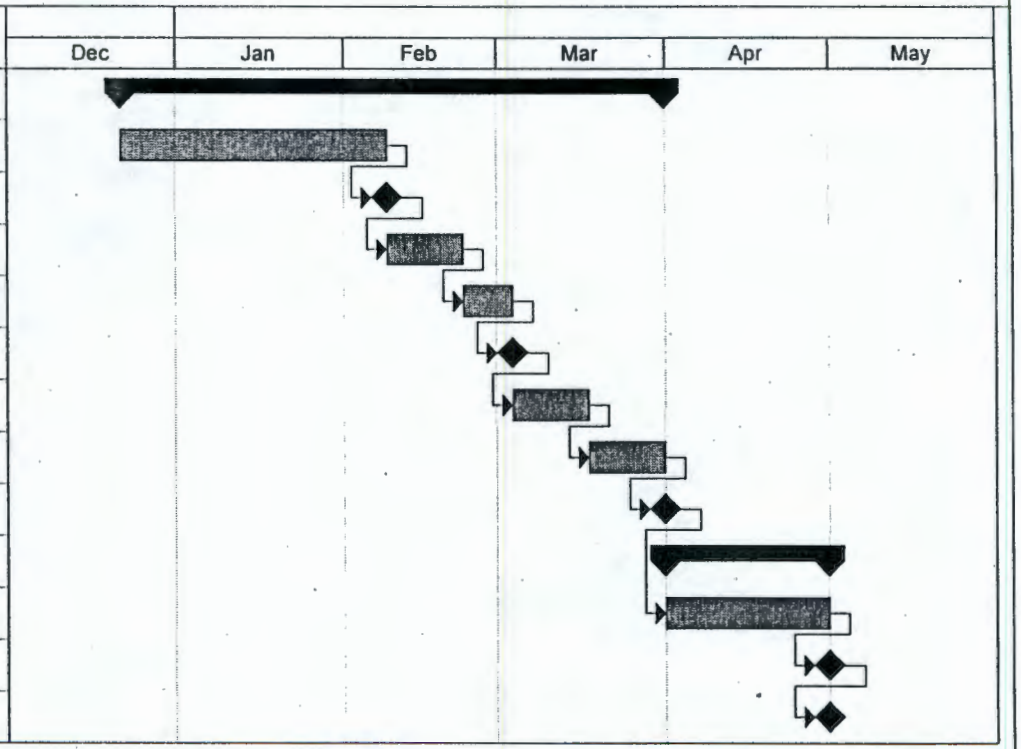
- Ecology reviews certification statement.
- Provides written concurrence or denial.

Actions After Approval

- Remove the ISO West tank for reuse.
- Modify the B Plant Part A, Form 3 to remove reference to the ISO West tank.
- Include administrative closure certification with closure documentation of the 276-BA Interim Organic Storage Facility (secondary containment structure and the ISO East Tank).

ISO WEST INTERIM ORGANIC STORAGE TANK
Detailed Administrative Closure Schedule

Task Name	Duration	Start	Finish
CERTIFICATION PREPARTION	**100d**	**12/22/97**	**4/1/98**
Prepare Draft Administrative Closure Certification	49d	12/22/97	2/8/98
M/S: Draft Certification Ready for Review	0d	2/9/98	2/9/98
Concurrent DOE-RL & PHMC Review	14d	2/9/98	2/22/98
Comment Incorporation	9d	2/23/98	3/3/98
M/S: Issue Final Certification	0d	3/4/98	3/4/98
PHMC Signature & Transmittal to DOE-RL	14d	3/4/98	3/17/98
DOE-RL Signature & Transmittal to Ecology	14d	3/18/98	3/31/98
M/S: Certification to Ecology	0d	4/1/98	4/1/98
ECOLOGY REVIEW	**30d**	**4/1/98**	**4/30/98**
Ecology Review of Certification	30d	4/1/98	4/30/98
M/S: Ecology Issues Approval/Rejection	0d	4/30/98	4/30/98
M/S: BEGIN REMOVAL OF ISO WEST TANK	**0d**	**5/1/98**	**5/1/98**



Date: 1/27/98
Permiting Lead: J. G. Adler, WMH

Task Progress Milestone Summary

CLOSURE OF THE 276-BA INTERIM ORGANIC STORAGE FACILITY

History of the 276-BA Facility

- Built in 1996.
- Interim storage of organic mixed waste from the B Plant canyon vessels.
- Identified on the B Plant Part A.

Facility Description

- Concrete secondary containment structure.
- ISO East tank that stored organic mixed waste.
- ISO West tank that never stored organic mixed waste.

Closure Strategy for the 276-BA Facility

- Administratively close ISO West tank.

- Use Debris Rule-type treatment (ie, steam cleaning or high pressure water wash) to decontaminate ISO East Tank.
  - ISO East tank is clean and no longer regulated when the rinsate contains levels of the organics (associated with the F-codes) either at or below the concentration based treatment standard, or the MTCA Method B ground water values (which ever is more conservative).
  - The rinsate will be managed as a listed waste.

- Use radiological survey as indicator for mixed waste contamination on the secondary containment structure.
  - If no contamination is found, then structure is clean.
  - If contamination is found, use Debris Rule treatment (scabbling) to remove only those areas were contamination is present.

Prepare Closure Plan to Document Actions

- Follows standard format.
- Documents the planned actions and closure criteria.
- Includes the administrative closure of the ISO West tank.
- Subject to public review.

Implementation

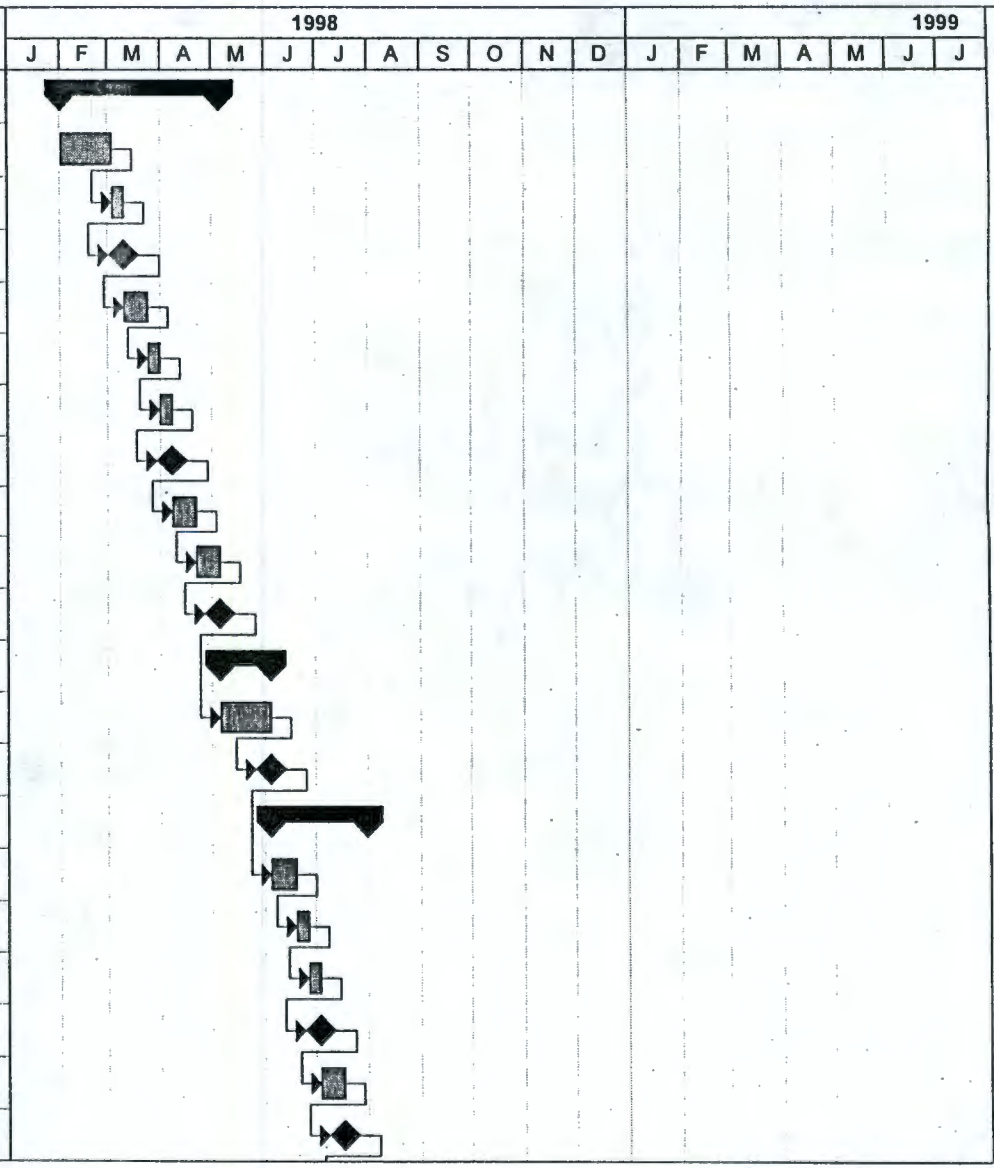
- Would proceed after Ecology accepts the closure plan as complete and ready for public review.
- To be done 'at risk' of public comments.
- To occur prior to and/or during the public review.

Completing Closure

- Submit closure certification at completion of closure activities.
- Ecology accepts certification after completion of public review.
- Modify the B Plant Part A, Form 3 to remove references to the 276-BA Interim Organic Storage Facility.

276-BA FACILITY
Detailed Closure Schedule

Task Name	Duration	Start	Finish
CLOSURE PLAN PREPARTION	**93d**	**2/2/98**	**5/5/98**
Write Closure Plan	30d	2/2/98	3/3/98
Assemble Plan	7d	3/4/98	3/10/98
M/S: Draft Closure Plan Ready for Concurrent Review	0d	3/10/98	3/10/98
Concurrent Review by PHMC and DOE	14d	3/11/98	3/24/98
Comment Resolution & Incorporation	7d	3/25/98	3/31/98
Document Preparation	7d	4/1/98	4/7/98
M/S: Issue Closure Plan Rev 0	0d	4/7/98	4/7/98
PHMC Concurrence & Transmittal to DOE-RL	14d	4/8/98	4/21/98
DOE-RL Concurrence & Transmittal to Ecology	14d	4/22/98	5/5/98
M/S: Closure Plan to Ecology	0d	5/5/98	5/5/98
ECOLOGY REVIEW AND RESOLVE COMMENTS	**30d**	**5/6/98**	**6/4/98**
Ecology Reviews Closure Plan	30d	5/6/98	6/4/98
M/S: Ecology Issues Comments	0d	6/4/98	6/4/98
RESOLVE COMMENTS & ISSUE CLOSURE PLAN REV 1	**57d**	**6/5/98**	**7/31/98**
Workshop to Resolve Ecology Comments	15d	6/5/98	6/19/98
Incorporate Comments into Draft Rev 1 of Plan	7d	6/20/98	6/26/98
Document Preparation	7d	6/27/98	7/3/98
M/S: Issue Closure Plan Rev 1	0d	7/3/98	7/3/98
PHMC Concurrence & Transmit to DOE-RL	14d	7/4/98	7/17/98
M/S: Closure Plan Rev 1 to DOE-RL	0d	7/17/98	7/17/98

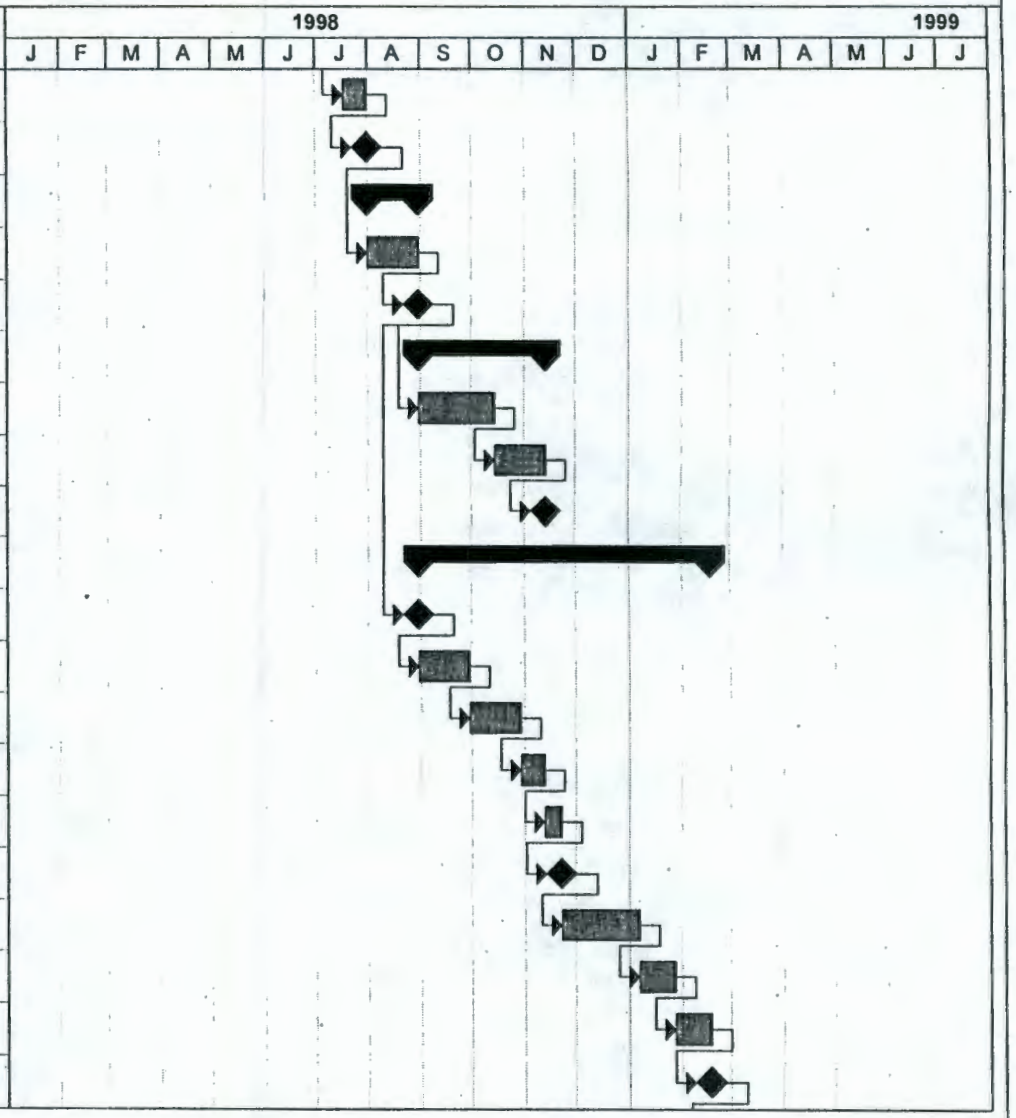


Date: 1/27/98
Permiting Lead: J. G. Adler, WMH

Task Progress Milestone Summary

276-BA FACILITY
Detailed Closure Schedule

Task Name	Duration	Start	Finish
DOE-RL Concurrence & Transmittal to Ecology	14d	7/18/98	7/31/98
M/S: Closure Plan Rev 1 to Ecology	0d	7/31/98	7/31/98
ECOLOGY REVIEW AND APPROVE PLAN	**30d**	**8/1/98**	**8/30/98**
Ecology Review Closure Plan Rev 1	30d	8/1/98	8/30/98
M/S: Ecology Issues Completeness Letter	0d	8/30/98	8/30/98
PUBLIC REVIEW	**75d**	**8/31/98**	**11/13/98**
Ecology Opens Public Review	45d	8/31/98	10/14/98
Ecology Addresses Pulbic Comments	30d	10/15/98	11/13/98
M/S: Public Review completed	0d	11/13/98	11/13/98
IMPLEMENT CLOSURE ACTIVITIES	**171d**	**8/30/98**	**2/17/99**
M/S: Start Closure Activities	0d	8/30/98	8/30/98
Conduct Closure Activities	30d	8/31/98	9/29/98
Prepare Final Report	30d	9/30/98	10/29/98
Concurrent PHMC/DOE review of Final Report	14d	10/30/98	11/12/98
Incorporate Comments and Issue Final Report	10d	11/13/98	11/22/98
M/S: Issue Final Report	0d	11/22/98	11/22/98
PE Certification of Closure	45d	11/23/98	1/6/99
FDH Certification of Closure	21d	1/7/99	1/27/99
DOE-RL Certification of Closure & Transmittal to Ecolog	21d	1/28/99	2/17/99
M/S Closure Certification to Ecology	0d	2/17/99	2/17/99

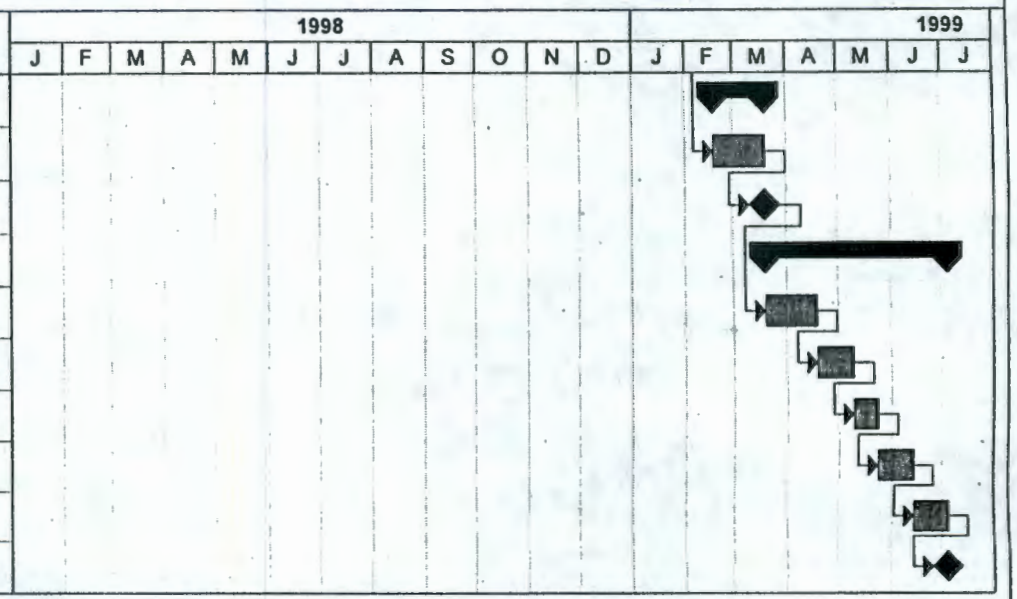


Date: 1/27/98
Permiting Lead: J. G. Adler, WMH

Task Progress Milestone Summary

276-BA FACILITY
Detailed Closure Schedule

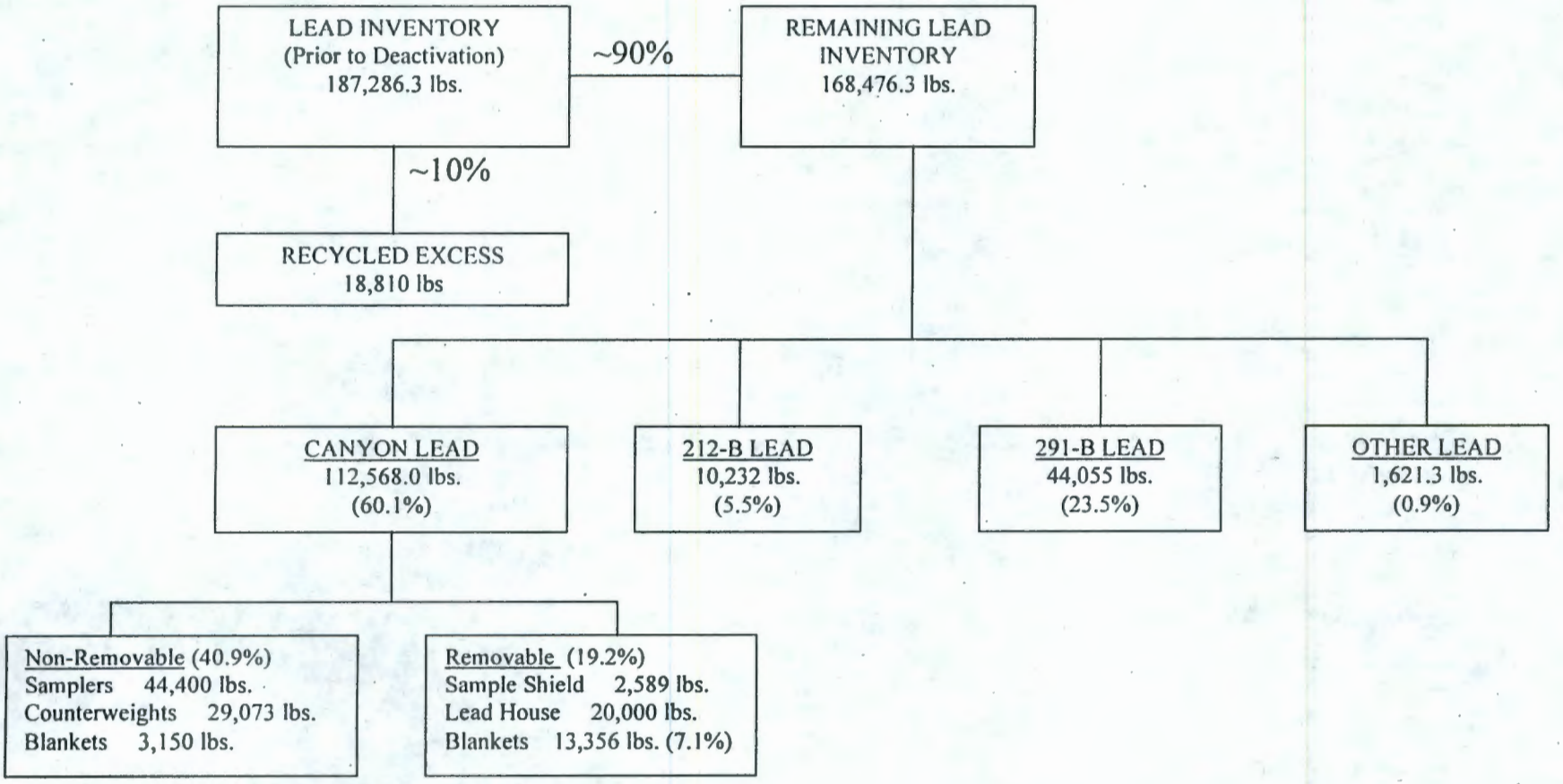
Task Name	Duration	Start	Finish
ECOLOGY REVIEWS OF CERTIFICATION	30d	2/18/99	3/19/99
Ecology Reviews Closure Certification	30d	2/18/99	3/19/99
M/S: Ecology Issues Acceptance Letter	0d	3/19/99	3/19/99
REVISE AND REISSUE PART A	107d	3/20/99	7/4/99
Perare draft B Plant Part A, Form 3	30d	3/20/99	4/18/99
Concurrent PHMC/DOE Review	21d	4/19/99	5/9/99
Resolve and Incorporate Comments	14d	5/10/99	5/23/99
PHMC Certification	21d	5/24/99	6/13/99
DOE Certification	21d	6/14/99	7/4/99
M/S: Revised B Plant Part A, Form 3 to Ecology	0d	7/4/99	7/4/99



Date: 1/27/98
Permiting Lead: J. G. Adler, WMH

Task Progress Milestone Summary

B PLANT LEAD INVENTORY (12/97)



B PLANT LEAD INVENTORY SUMMARY (12/97)

ENTRY NO.	DESCRIPTION (Type and Dimension) (brick, blanket, etc.)	SPECIFIC LOCATION	QUANTITY		CATEGORY AND STATUS (hard, estimate, permanent installation, excess, notes, etc.)
			NO. OF PIECES	TOTAL WEIGHT	
221-B CANYON					
1	Lead Blankets 2' x 2 1/2'	221-B Canyon, various locations	262 @ 63 lbs.	16,506 lbs.	Future use as shielding, Necessary Hard Lead, located in a contamination zone.
2	Gilmont Shield	221-B Canyon	1	2,589 lbs.	In use as shielding, Necessary Hard Lead, located in contamination zone.
3	Lead counter balance weights on jumpers	221-B Canyon	108 @ 129.3 lbs.	14,073 lbs.	In use as counter balance weight, Necessary Hard Lead, located in contamination zone.
4	Lead House	221-B Canyon	1	20,000 lbs.	In use as shielding, Necessary Estimated lead, located in a contamination zone.
5	Counter balance weights	221-B Canyon		15,000 lbs.	In use as counter weights, Necessary Estimated lead, located in a contamination zone.
6	N74 sample pits and pit cover, inclosed in stainless steel	221-B Canyon	74 @ 600 lbs.	44,400 lbs.	In use as shielding, Necessary Hard lead, located in a contamination zone.
			AREA TOTAL	112,568.0 lbs	
291-B FILTER PITS					
1	Lead Sheets (various sizes)	291B Filter A&B water seal pit & C water seal and sump jet pit	25 @ 63 lbs. 2 @ 60 lbs.	1695 lbs.	In use as shielding, Necessary Hard Lead
2	Lead shot at an average depth of 6 inches	A/B filter sump jet valve pit		41,890 lbs.	In use as shielding. Necessary estimated lead, in a contamination zone. See drawing H-2-32619 to estimate volume of shot and weight.
3	Lead blankets 1' x 1 1/2	A/B filter pit	18 @ 20 lbs. 11 @ 10 lbs.	470 lbs.	In use as shielding.
			AREA TOTAL	44,055.0 lbs	

212-B FACILITY					
1	Lead wool	212-B Hot Cell Window		20 lbs.	In use as shielding, located in a contamination zone.
2	Lead Glass	212-B Hot Cell Window		9000 lbs.	In use as shielding, one side located in a contamination zone. In place to provide shielding.
3	Lead Sheeting	212-B Hot Cell		5-10 lbs.	In use as shielding, located in a contamination zone.
4	Lead	212-B Hot Cell, 226 Strontium loadout line		180 lbs.	In use as shielding, located in a contamination zone.
5	Lead	212-B canyon, cover block port covers		1015 lbs.	In use as shielding, located in a contamination zone.
6	Lead flashing on sewer vent pipes, 1/8" thick flashing	212-B change room roof		7 lbs.	Used as weather stripping.
			AREA TOTAL	10,232.0 lbs	
OTHER B PLANT LOCATIONS					
1	Lead sheets as part of a wall. Cut in various sizes. Mostly 1/4" sheets. Lead is bolted to wall.	221-B, Pipe Gallery, south and north wall, east end. From cell 8 to cell 11.	34 sheets, north wall, 41 sheets, south wall	1148 lbs.	In use as shielding, Necessary Estimated lead, possibly contaminated (lead has been painted)
2	Shielding for pipe chase through floor. 1/4" cover made of lead sheets.	221-B, Pipe Gallery between cells 8 to 16, north wall	7 @ 23.7 lbs 1 @ 22.4 lbs 1 @ 17 lbs	205.3 lbs.	In use as shielding, Necessary estimated lead, possible contamination, painted.
3	Lead found in sewer piping	Various locations, see drawings			In use as pipe sealant.
4	Lead Blanket 2" x 2 1/2"	Lead storage connex #10	1 @ 63 lbs.	63 lbs.	Future use as shielding. Necessary hard lead.
5	Lead plug for raw water line	221BA Raw water line valve		25 lbs.	In use as shielding.
6	Lead plug for raw water line	221BG Raw water line valve		25 lbs.	In use as shielding.
7	Lead lined dip rod catch pans	211B Horizontal tanks		75 lbs.	
			AREA TOTAL	1,621.3 lbs	
GRAND TOTAL 168,476.3 lbs					