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September 20, 1990

*Final*  
*mtg 10/23/90*  
*LEC 10/23/90*  
*(H) for GTT 10/23/90*

**Meeting Minutes Transmittal  
Unit Managers Meeting: 616 Nonradioactive  
Dangerous Waste Storage Facility (NRDWSF)  
& 305-B  
Federal Building, Room G-53  
Richland, Washington**

Meeting Held September 20, 1990

Appvl. *Clifford E. Clark* Date: 10/23/90  
 Clifford E. Clark, Environmental Policy and Permitting, DOE-RL

Appvl. \_\_\_\_\_ Date: \_\_\_\_\_  
 Daniel L. Duncan, EPA Region X Unit Manager

Appvl. *Randal J. Roberts for RTR* Date: 10/26/90  
 Randal J. Roberts, Contractor Representative, WHC

Appvl. *Glenn Thornton for* Date: 10/23/90  
 Glenn Thornton, Contractor Representative, PNL

Appvl. *S. M. Price* Date: 10-23-90  
 Susan M. Price, Contractor Representative, RCRA Permitting, WHC

Appvl. *Megan E. Lerchen* Date: 10/23/90  
 Megan E. Lerchen, Unit Manager, Washington State Department of Ecology

PURPOSE: Discuss permitting process.

Meeting Minutes are attached. Minutes are comprised of the following:  
 Attachment #1 - Summary of Meeting Discussion and Commitments  
 Attachment #2 - Agenda  
 Attachment #3 - Attendance List  
 Attachment #4 - Commitments/Agreements Status



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Attachment #1  
Summary of Discussion

1. Discussion of NOD Comments

DOE commented that the agenda is short and that some of the items had been discussed with Ecology during the meetings held yesterday. WHC stated that some of the issues facing 616 have been taken as far as they can be taken within the framework of this unit. These issues need to be resolved in the Hanford Facility Dangerous Waste Permit (HFDWP or Sitewide). There are 4 issues listed on the agenda that need to be and can be addressed in this meeting. Sample verification is one of the issues that was going to be discussed in Sitewide but now appears to be more of a 616 issue; currently, we are at an impasse. WHC suggested that a special working group be set up to discuss this and other issues. DOE commented that a letter from DOE was sent to the agencies outlining agreements from the last Sitewide meeting and suggested the formation of special working groups. DOE has identified 6 individuals from their staff: Cliff Clark, Bob Carosino, Harold Tilden, Jim Powers, Sue Price, and Jim Rasmussen, who would be on this special working group and requested agencies to supply individuals for the working group. DOE commented that the working group would facilitate the use of specialists in the fields outside of the individuals normally involved in the UMM. If the issues can not be resolved in the working groups, they will be upgraded to the Project Managers level for resolution.

Sue Price  
Jim Rasmussen  
LSC 10/23/90  
HW 10/23/90

A. Sample Verification

Ecology has received some of the information on designation of dangerous waste but stated that several points needed clarification one of which is sampling protocols. A discussion on the sample collection and waste designations followed. Ecology commented that the last time sample verification was discussed it sounded as if the current DOE/WHC designation procedure might fit what Ecology is looking for. Ecology would prefer to use a procedure that is in-place rather than to have a new one developed and inquired as to when the plan would be delivered to Ecology. WHC commented that the plan is close to completion and they are currently making some minor modifications. After a discussion, it was decided that a special working group would be an appropriate manner to address this issue.

DOE voiced the concern that there is currently no mechanism to submit the sitewide information to Ecology for inclusion into the sitewide permit application and feel that a method is needed. They currently are concerned about the current piece meal fashion that information has been submitted to Ecology and commented that they had not gotten any agreement on how this should be done or any indication of a time frame. Ecology responded that DOE/WHC should write up a proposal along with a schedule proposing a mechanism for delivering this type of information to Ecology. A discussion followed on how the information could be transmitted to Ecology. DOE concurred with writing a proposal and

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Ecology stated that they will inform their management that this proposal will be coming.

Action Item # 1: A proposal covering a method to transmit information to be included into the site wide permit along with a schedule for submittals will be developed and submitted to Ecology for approval. Action DOE, WHC,

B. Closure Cost Estimates

DOE commented that this is a sitewide issue and that there is no sense in discussing it. Ecology commented that this is a requirement that will need to be fulfilled but sees no point in discussing it within the confines of this meeting, at this point in time.

C. Sample Verification

Ecology brought up the subject of sample verification again. They still would like to know the time frame in which a plan would be submitted and if no other mechanism exists for its delivery then ~~she~~ <sup>Ecology</sup> suggested using the EII as a method of transmitting this information. A discussion ensued on methods of transmitting this information and the status of the EIIs. DOE commented that the sample verification and mechanism for transmittal will be two issues that will take precedence over all other issues. Ecology stated that they do not want to have other issues set aside to address this issue that all issues should be moving forward on parallel paths. DOE stated that they have limited manpower resources and stated that two issues take precedence over all other: closure costs and financial responsibility. Ecology commented that these two issues are legal and not technical as is sample verification. DOE responded that these are the first two issues and that sample verification was probably the third issue to be addressed. A general agreement was reached that work would progress on as many of the issues as the limited manpower resources would allow. A discussion developed on the structuring, formality, and ground rules for the working groups and their recommendations. Working Groups will be developed to address different technical issues both for site wide and unit specific issues. The progress from the working groups will be reported back to the UMM. Ecology inquired when a proposal on the working groups would be submitted and DOE commented that it would be within 3-4 weeks.

HH  
LCC  
10/23/90

D. Presentation on Current Operations

DOE suggested that WHC give a fairly detailed summary, 2-3 hour presentation on current activities and procedures related to handling RCRA wastes at Hanford. This presentation would cover point of generation through final disposal and include such topics as: waste designation, verification sampling, shipping off site

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and on site, etc. A discussion on the presentation and the content ensued.

**Action Item #2:** A 2-3 hour detailed summary presentation will be developed by the end of October, 1990 that covers current practices and procedures for handling dangerous waste from point of generation through to final disposal. Action Rudy Guercia

Ecology commented that it would be appropriate to include handouts from the presentation that would contain more indepth information than that which was presented. WHC replied that a lot of the information will probably be handed out in the form of a manual.

DOE stated that two letters need to be generated and sent to Ecology (Tim Nord) that cover the following:

1. Identifying the general site wide issues related to the Part B permit and a proposed working group schedule for resolution of these issues.
2. Covering waste verification and proposing using a working group to attack this issue.

**Action Item #3:** To write two letters covering the following: 1. Identifying general site wide issues related to the Part B permit and propose the use of working groups and a schedule for their meetings, 2. Waste verification and proposing the use of a working group to attack this issue. Action WHC

E. Contingency/Emergency Plan

DOE commented that this was discussed in detail in the meetings held yesterday (September 19) and that they are going to wait for some feedback on this issue from Ecology. Ecology commented that they will review the plans submitted with the first round of submittals for the permit and will inform DOE/WHC as to what is required to be added to the plans to fulfill the requirements. This will include the required depth of detail. DOE commented that by the end of next week PUREX's emergency plan will have been submitted to Ecology and requested that Ecology review it and inform DOE/WHC if this is the depth of detail that Ecology is looking for in the 616 plan. If this plan fulfills the requirements then it could be modified to apply to 616. WHC commented that only the portions of the PUREX plan applying to dangerous waste would be applicable to 616. A general discussion ensued on what section would be included, exclusion of non-RCRA wastes from the plan, and how section applicable to 616 would be

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chosen. Ecology proposed that the plan be review section by section to determine applicable sections.

**Action Item #4:** Determine which sections of the submitted Contingency/Emergency Plan covers section covered by RCRA regulations and which should not be covered by the permit. Action Megan Lerchen

**F. Container Labeling**

DOE commented that putting the current DOT and DOE mandated labels on containers should fulfill the requirement for hazard identification. Ecology commented that DOE needs to comply with the state regulations. DOE replied that currently there are three or more labels on the containers: RCRA required labeling, DOE required radioactive labeling, DOT labels and now a fourth one for Ecology. Their concern is that as the number of labels added to the containers increase so does the potential for mistakes and confusion as to what is required. A discussion ensued as to the current practices and requirements for labeling. Ecology stated that this requirement only requires labeling for waste categories defined by the State which are not defined by other regulations. This includes persistence, toxic and carcinogenic. A general discussion ensued on the labeling requirement. Ecology stated that the state does not have a prescribed label and that DOE is free to propose its design. DOE commented that they are discussing a label which contained boxes for the appropriate designation which could be check off. Ecology concurred with this design but added that the marking in the box would have to be done with indelible ink. WHC inquired as to the date such a requirement would be implemented and that it would be nearly impossible, if the entire storage inventory was grandfathered into this requirement. Ecology commented that DOE/WHC should come up with a proposal and schedule covering the labeling requirement and an alternative identification scheme for items already in the storage inventory.

**305-B**

**A.** Ecology inquired as to when PNL was going to plug the drain at the 305-B unit. *Ecology* She indicated that a temporary plug must be placed in the drain to eliminate potentially big problems if a spill did occur.

*#10/67  
10/23  
LSC  
10/23/90*

**Agreement** The next UMM will be held on October 23, 1990 in Richland, Washington.

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Attachment #2  
Agenda

616 NRDWSF Unit Managers' Meeting  
& 305-B  
September 20, 1990  
Federal Building, Room G-53  
Richland, Washington

9:00 a.m. - 12:00 a.m.

1. Discussion of NOD comments (Ecology/DOE-RL/WHC)
  - o Sample verification approach (Comment 14, 73)
  - o Provision of closure cost estimates (Comment 66)
  - o Contingency/emergency plan approach (Comments 38, 44, 46, 85)  
86, 96, 102, 106, 107, 108, 109, 110)
  - o Container labeling (Comment 87)
2. Schedule for completion of 616 NRDWSF revision
3. 305-B

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Attachment #3

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u> _____
Roger Bowman	WHC	509-376-4876
Cliff Clark	DOE/ERD	509-376-9333
Mike Gasser	SWEC	509-376-9830
Rudy Guercia	DOE	509-376-5494
Teresa Hennig	DOE	509-376-6888
Megan Lerchen	Ecology	206-438-3089
Richard Pierce	WHC	509-373-4846
Sue Price	WHC	509-376-1653
Harold Tilden	PNL	509-376-0499

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Attachment #4  
Commitments/Agreements Status

616 NRDSF

<u>Action Items</u>	<u>Commitments/Agreement Status List</u>
9-20-90:1	<p>A proposal covering a method to transmit information to be included into the site wide permit along with a schedule for submittals will be developed and submitted to Ecology for approval. Action DOE, WHC</p> <p>NEW</p>
9-20-90:2	<p>A 2-3 hour detailed summary presentation will be developed by the end of October, 1990 that covers current practices and procedures for handling dangerous waste from point of generation through to final disposal. Action Rudy Guercia</p> <p>NEW</p>
9-20-90:3	<p>Two letters will be written covering the following: 1. Identifying general site wide issues related to the Part B permit and purpose the use of working groups and a schedule for their meetings, 2. Waste verification and proposing the use of a working group to attack this issue. Action WHC</p> <p>NEW</p>
9-20-90:4	<p>Determine which sections of the submitted Contingency/Emergency Plan covers section covered by RCRA regulations and which should not be covered by the permit. Action Megan Lerchen</p> <p>NEW</p>
7-23-90:1	<p>Ecology will send a copy of the inspection checklist to DOE. Action Megan Lerchen</p> <p>CLOSED: Transmitted checklist to DOE.</p>
7-23-90:2	<p>The draft Waste Designation Plan will be submitted to Ecology and EPA for review by the first week in August. Action WHC.</p>

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OPEN: This is scheduled to be submitted to the agencies by October 30, 1990.

7-23-90:3

The comments from Ecology on the draft Part B Permit application are pending and should be ready by the first or second week in August. Action Megan Lerchen.

CLOSED: Submitted to Ecology on August 30, 1990.

7-23-90:4

The Site Wide Emergency Plan will be supplied to Ecology and EPA. Action Cliff Clark.

CLOSED: Two informational copies of the Site Wide Emergency Plan was sent to the agencies.

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305-B

Action Items

Commitments/Agreement Status List

8-15-90:1

Send a copy of WHC's & PNL's Emergency Plans to Ecology by August 16, 1990. Action Sue Price

OPEN

Agreement

The next meeting will be held in Richland, Washington on October 23, 1990.

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Distribution:

M.R. Adams WHC (L4-92)  
M.J. Anthony DOE (A6-95)  
J.D. Bauer WHC (B3-15)  
L.E. Bornema WHC (B2-19)  
R.C. Bowman WHC (H4-57)  
E.A. Bracken DOE (A6-95)  
L.C. Brown WHC (H4-51)  
R.W. Brown WHC (H4-55)  
J.W. Cammann WHC (H4-54)  
R.M. Carosino DOE (A4-52)  
G.D. Carpenter WHC (H4-15)  
C.E. Clark DOE (A6-95)  
C. DeFigh-Price WHC (B2-20)  
W.T. Dixon WHC (B2-35)  
G.T. Dukelow WHC (R2-97)  
D.L. Duncan EPA (WW-W2)  
K.R. Fecht WHC (H4-56)  
C.J. Geier WHC (H4-57)  
T.M. Hennig DOE (A6-80)  
R.D. Izatt DOE (A6-95)  
J. King SWEC (A4-35)  
G.W. Jackson WHC (R4-01)  
R.J. Landon WHC (B2-19)  
R.E. Lerch WHC (B2-35)  
M.E. Lerchen Ecology  
D.W. Lindsey WHC (R2-82)  
H.E. McGuire WHC (B2-35)  
T.M. Michelena Ecology  
S.H. Norton WHC (T3-28)  
R.D. Pierce WHC (R2-80)  
L.L. Powers WHC (B2-35)  
S.M. Price WHC (H4-57)  
L.W. Roberts WHC (R2-80)  
R.J. Roberts WHC (R2-97)  
M. Romsos WHC (R2-82)  
F.A. Ruck III WHC (H4-57)  
H.T. Tilden PNL (P7-68)  
T.B. Veneziano WHC (B2-35)  
S.A. Wiegman WHC (B2-19)  
K.A. Woodworth WHC (H4-55)

R.F. Guercia DOE (A5-21)  
G.T. Thornton WHC (P7-68)

ADMINISTRATIVE RECORD (616 Nonradioactive Dangerous Waste Storage Facility (S-6-1) and 305-B (S-3-B)) [Care of Susan Wray, WHC (H4-22C)]

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