

Meeting Minutes Transmittal/Approval
Hanford Project Managers' Meeting
Richland, Washington
March 26, 1993

From/ Appvl.: *SHW* Date: 4/28/93
Steven H. Wisness, RL (A5-19)
Hanford Project Manager

Appvl.: *Paul T. Day* Date: 4/28/93
Paul T. Day, EPA (B5-01)
~~Hanford Project Manager~~

Appvl.: *Roger F. Stanley* Date: 4/28/93
Roger F. Stanley, Ecology
Hanford Project Manager

Prepared by Appvl.: *Frank T. Calapristi* Date: 4/28/93
Frank T. Calapristi
Westinghouse Hanford Company

DISTRIBUTION

B. A. Austin	WHC	B2-35	P. M. Pak	RL	A5-19
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J. K. Erickson	RL	A5-19	R. K. Stewart	RL	A5-19
D. L. Flyckt	WHC	R3-45	R. F. Stanley	Ecology	Olympia
G. D. Forehand	WHC	B2-35	L. Soler	MACTC	A4-35
J. M. Hennig	RL	A5-21	L. E. Thiede	WHC	A7-75
D. B. Jansen	Ecology	Olympia	K. M. Thompson	RL	A5-15
R. N. Krekel	DOE	A5-15	R. Thranbarger	WHC	H6-05
J. R. Laws	WHC	H6-23	T. B. Veneziano	WHC	L4-96
R. D. Morrison	WHC	B2-35	S. H. Wisness	RL	A5-15
D. Nylander	Ecology	Kennewick	J. K. Yerxa	RL	A5-15
			EDMC	WHC	H6-08



Hanford Project Managers' Meeting

March 26, 1993

Project Managers (PMs): Paul Day, Dave Jansen, Steve Wisness

WHC Tri-Party Agreement: Becky A. Austin

Recorder: Frank T. Calapristi

1. TWRS Rebaseline Status (S. H. Wisness, K. M. Thompson, G. D. Forehand)

S. Wisness provided the TWRS status. A draft DOE letter on the proposed rebaseline is being prepared and will be given to EPA and Ecology (D. Silver and R. Stanley) today.

Main Points of the letter will include:

- Basis for rebaseline strategy
- 6 months deferral of HWVP foundation construction
- Decision to proceed with construction of the Canister Storage Facility
- Need for a joint Public Involvement Plan (Start discussions next week)
- List of proposed areas for accelerated clean-up
- Economic Conclave
- Ecology participation in allocation of the Presidents' Budget
- Three main groups of new milestones
 - Milestones M-40 through M-49: Management of Tank Waste
 - Milestones M-50 through M-59: Processing of Tank Waste
 - Milestones M-60 through M-69: Management of System Generated Waste

DOE requested a meeting with Ecology and EPA on Tuesday, March 30 to review the letter and determine the next steps. Ecology deferred commitment to the meeting until they had a management review of the letter or draft. EPA will be unable to attend because of a prior commitment.

2. Planned Amendment to the Tri-Party Agreement (+ R. D. Morrison)

Ron Morrison provided a list of potential amendments to the Tri-Party Agreement (Attachment 1A). There was a general discussion on the upcoming TWRS negotiations and its impact to the potential amendments.

The list was reviewed and those amendments determined to be impacted by TWRS were deferred until completion of the negotiations. The balance of the potential amendments were acted upon by the Project Managers or assigned to lead personnel for review and approval. The results of the discussion are reflected in (Attachment 1B).

3. Change Request Status (+ R. D. Morrison)

The following Change Requests were reviewed; however, regulator approval was deferred to a later date.

- M-15-92-06 RI/FS Interim Milestones (100-DR-1)
- M-20-92-08 New Interim Milestone (M-20-51)

4. SEC Meeting Agenda (S. H. Wisness, P. T. Day, R. Stanley)

S. Wisness opened the discussion and asked for suggested topics for the Senior Executive Committee (SEC) meeting planned on April 13, 1993. There were a number of topics discussed and the following list was developed in the order of priority.

1. TWRS Rebaseline
 - Negotiations
 - Change Request
 - Public Involvement
 - FY94 Budget
2. Tri-Party Agreement Milestone (M-14-00 Low Level Lab)
3. Public Involvement
 - Site Specific Advisory Group
 - Citizens Forum
 - NWAC
4. Overall FY 1994 Budget
5. Status of Schedule Optimization Study
6. ER Storage and Disposal Facility
7. Miscellaneous (Data Management, Ecology Reorganization, On-site presence of DOE and Ecology, etc.)

5. Schedule Optimization Study (+ D. C. Stapp)

D. C. Stapp presented a report on the Scheduled Optimization Study (SOS) recently completed Attachment 2). In response to questions by the regulators, RL noted that although they are short of staff, they are very committed to implementation of the SOS study.

Ecology asked about the Waste Management (WM) role in the Environmental Restoration (ER) SOS. RL noted the report was presented to all the RL assistant managers for their review and the intent of the SOS was to address only the ER program. ER had bought in to the plan but there was no formal response from the WM staff. EPA asked who are the decision makers to implement the recommendations in the report. RL replied, ER is responsible for coordinating the actions to implement the required changes. Although, some actions would be completed by personnel outside of the ER program.

EPA expressed concern about the absence of a defined tracking system to measure progress on the SOS recommendations. The Milestone Review and Project Managers meetings were suggested as possible review mechanisms.

The question of prioritizing the recommendations was discussed. PNL reported the implementation plan has a recommended priority listing.

Action: RL to provide a date when the detailed implementation plan would be available for EPA and Ecology.

Resp.: J. Erickson **Date:** April 13, 1993

Action: Provide a status of the SOS at the Senior Executive Committee meeting on April 13. Report John Wagoner's position on how other RL organizations affect ER but are not part of the ER Program.

Resp.: J. Erickson **Date:** April 13, 1993

6. B-Pond Closure/200 BP-11 Operable Unit (+ R. McLeod)

R. McLeod presented the information (Attachments 3A and 3B) and stressed that upper level management decisions will be required to integrate the B-Pond Closure and 200-BP-11 Operable Unit into one work plan.

The draft B-Pond System Integrated Schedule was reviewed and RL requested a decision by Ecology by May 3, 1993 to meet the June 1995 date for the M-17-10 milestone.

A draft Change Request was provided in the handout, which will be worked at the unit manager level. The change request will need to be signed at the April 22 Project Managers meeting, in order to maintain the schedule.

7. **Project C-018H: Construction of the 242-A Evaporator/Purex Plant Condensate Treatment Facility (+ J. Hennig, D. Flyckt, T. Veneziano, J. Rasmussen)**

Note: This topic was a late addition to the Project Managers Meeting agenda.

Don Flyckt presented the information on the C-018 Facility (Attachment 4) and discussed three options for effluent treatment.

- UV Oxidation
- Granulated Activated Carbon (GAC)
- UV Oxidation with GAC polishing

RL identified UV Oxidation as the preferred treatment system. RL also informed the regulators they are starting construction based on preliminary regulator approval. RL asked the regulators to work with them and expeditiously identify effluent limitations of the 216 Permit.

Ecology asked how this project will affect tank space.

Action: RL to provide EPA and Ecology projections of how C-018 may affect the tank farms.

Resp.: J. Hennig Date April 16, 1993

Action: RL to provide Ecology information on travel time from the C-018 disposal site to the river.

Resp.: June Hennig Date: April 30, 1993

Action: RL to notify EPA and Ecology of any dissenting opinions on the groundwater transport model.

Resp.: J. Hennig Date: April 30, 1993

8. **Public Involvement (+ A. Stephan, L. Thiede, D. Faulk)**

- D. A. Faulk reviewed the plan for the CRP Public Meeting and requested approval of Bob Stilger as a facilitator at the Seattle location. The Project Managers approved the request.
- Paul Day discussed the 1100 Area Timeline (Attachment 5). A question was raised about the April 29 Public Meeting date. EPA will review the request with management and get back to RL.
- Paul Day reviewed the Tri-Party Agreement requirement to have a public comment period on the Annual Update. There is a proposed Tri-Party Agreement amendment to eliminate the public comment period since all

Tri-Party Agreement changes were previously approved in the change request process.

The Public Involvement PIO's were requested to review the request for deleting a public comment period for the annual update. A recommendation is requested at the April Project Managers Meeting.

- Roles and Responsibilities of the three parties were discussed. Specifically what are the lead roles of the parties in the Public Involvement process.

Action: PIO's to make a recommend three party lead role responsibilities for the public involvement process.

Resp.: A. Beers, D. Faulk, L. Theide **Date:** April 22, 1993

TRI-PARTY AGREEMENT PROJECT MANAGERS MEETING

MARCH 26, 1993

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

- 9:00 am TWRS REBASELINE STATUS
(S. WISNESS, L. ERICKSON, K. BRACKEN, D. NEWLAND, D. FOREHAND,
D. LINDSEY, D. PABST)
- 10:00 am PLANNED AMENDMENT TO THE TPA
(S. WISNESS, R. MORRISON)
- 10:30 am BREAK
- 10:45 am CHANGE REQUEST STATUS
(S. WISNESS, P. DAY, R. STANLEY, R. MORRISON)
- o APPROVE CHANGE REQUESTS
 - o M-15-92-06 (100-DR-1 RI/FS INTERIM MILESTONES)
 - o M-20-92-08 (NEW INTERIM MILESTONE M-20-51)
 - o DISCUSSION--OPEN CHANGE REQUESTS
- 11:15 am SEC MEETING AGENDA
(S. WISNESS, P. DAY, R. STANLEY)
- 11:45 am LUNCH
- 12:30 pm SCHEDULE OPTIMIZATION STUDY IMPLEMENTATION
(S. WISNESS, R.K. STEWART, D. C. STAPP, T. WINTCZAK, L. ARNOLD)
- 1:00 pm B-POND CLOSURE/200-BP-11 OPERABLE UNIT
(S. WISNESS, R. MCLEOD, F. RUCK, D. FOREHAND)
- 1:30 pm PUBLIC INVOLVEMENT (J. YERXA, M. GETCHELL, D.A. FAULK,
L. THIEDE, A. STEPHAN)
- o CRP PUBLIC MEETINGS (Tri-Cities, 4/13; Seattle, 4/14)
 - o 1100 EM-1 PROPOSED PLAN
 - o ROLES AND RESPONSIBILITIES
- 3:00 pm ADJOURN

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ATTENDEES

TPA PROJECT MANAGERS MEETING

MARCH 25, 1993

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>
<u>F.T. CALAPRISTI</u>	<u>WHE/TPA</u>	<u>B2-35</u>
<u>Dave Nylund</u>	<u>Ecology</u>	<u>Kennwick</u>
<u>Carole Jensen</u>	<u>Ecology</u>	<u>Clyde</u>
<u>David Forehand</u>	<u>WHE/TPA</u>	<u>B2-35</u>
<u>Steve Wisner</u>	<u>DOE</u>	<u>A5-15</u>
<u>Luis Sole</u>	<u>Dames & Moore</u>	<u>A4-35</u>
<u>Becky Auszin</u>	<u>WHE/TPA</u>	<u>B2-35</u>
<u>K. Michael Thompson</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>
<u>R D MORRISON</u>	<u>WHE/TPA</u>	<u>B2-35</u>
<u>Paul Day</u>	<u>EPA</u>	<u>B5-01</u>
<u>Jake R Laws</u>	<u>WHE/RCRA Closure</u>	<u>H6-23</u>
<u>Rhett Tranbarger</u>	<u>WHE/Post-Practice</u>	<u>H6-05</u>
<u>Andrea L. Prignano</u>	<u>WHE/RCRA closures</u>	<u>H6-23</u>

ATTENDEES

TPA PROJECT MANAGERS MEETING

MARCH 25, 1993

EPA CONFERENCE ROOM
MEDICAL DENTAL CENTER

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>
<u>Paul Pak</u>	<u>DOE - RL/20000</u>	<u>A5-19</u>
<u>Paul Beaver</u>	<u>EPA</u>	
<u>Bob Stewart</u>	<u>DOE - RL/ERD</u>	<u>A5-19</u>
<u>Pat [unclear]</u>	<u>WTC [unclear]</u>	<u>15 E</u>
<u>JULIE ERICKSON</u>	<u>DOE - RL/ERD</u>	<u>A5-19</u>
<u>Randall N. Kreckel</u>	<u>DOE - RL EAP</u>	<u>A5-15</u>
<u>JUNE HENNIG</u>		
<u>TIM VENEZIANO</u>		
<u>JIM RASMUSSEN</u>		
<u>H.C. BORNEMAN</u>		
<u>DON FLYCKT</u>		
<u>Angel [unclear]</u>	<u>Ecology</u>	
<u>Andette Stephen</u>	<u>WHA</u>	<u>B3-35</u>

March 26, 1993

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
1.	Action Plan, Section 2.0 Figures 2-1, 2-2 and 2-3	Modify figures to reflect approved changes to milestones M-01, M-02, M-12, M-13, M-14, M-17A&B, M-18, M-24, M-25, and M-31 (potentially M-19).	
2.	Action Plan, Section 2.0 Tables 2-1, 2-2 and 2-3	Modify tables to reflect approved changes to milestones M-14, M-17A&B, M-18, M-24, and M-25.	
3.	Action Plan Section 7.0	Incorporate changes resulting from implementation of the Hanford Past Practice Investigation Strategy.	
4.	Action Plan, Section 9.2.1, Table 9-1	Update Table 9-1 to reflect documents which are now primary documents such as documents declared primary within negotiated milestones (e.g. LDR Plan Reports) (LDR Plan itself?).	
5.	Section 9.3, last paragraph, third sentence	Remove "For RI/FS and RFI/CMS work plans," and begin sentence with "The change notice...". This change is intended to acknowledge the fact that all changes included in unit manager meeting minutes are thereby included in the administrative record.	
6.	Section 9.4, first bullet on page 9-10	Correct the RL administrative record address. Replace "345 Hills Street (off George Washington Way)" with "740 Stevens Center". The administrative record has moved into the 740 Stevens building in the November/December 1992 time frame.	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
7.	Section 9.4, fifth paragraph, third sentence	<p>Remove this sentence in its entirety. This sentence begins with "Hard copies will...".</p> <p>Only microfilm is provided to EPA and Ecology.</p>	
8.	Section 9.4, fifth paragraph, fourth sentence	<p>Remove "Every 6 months,". Add "continually" between "be" and "provided".</p> <p>Microfilm copies of the latest documents included in the administrative record files are provided to EPA and Ecology as it is processed.</p>	
9.	Section 9.4, sixth paragraph (last on page 9-10)	<p>Add the following sentences between the first and second sentences: "Because of space limitations, the hard copy of laboratory analytical data packages may be retained in alternate storage locations on the Hanford Site".</p> <p>The EPA guidance allows administrative record documents to be in microform or hard copy. Space limitations mandate the ability to house laboratory analytical data packages in locations other than the master AR files. It is anticipated that the data packages will be microfilmed and the hard copy transmitted to the Records Holding Area for long term retention.</p>	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
10.	Section 9.4, eighth paragraph (first set of bullets on page 9-11)	<p>Add the following bullet to the end of the list: " o Public comments and lead regulatory agency responses (if no comments are received, a letter from the lead regulatory agency shall be written to document that fact)".</p> <p>Public participation is a vital part of the overall cleanup process. It is necessary to include public comments in the AR and it is beneficial to also include the responses. If no comments are received, it is very beneficial from a public perception viewpoint that it is clearly stated that no public comments were received.</p>	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
11.	Section 9.4, third paragraph on page 9-14	<p>Remove this paragraph and replace with the following: "Documents meeting the AR criteria and identified with one or more OU's or TSD's will be placed on an Administrative Record Candidate Review List. The list will be provided each month to all three unit managers responsible for the involved OU or TSD unit. This list will include the potential administrative record documents that have been received by the administrative record in the prior month.</p> <p>Unit managers for the involved OU's or TSD's shall review the Administrative Record Candidate Review List and identify documents to be included in the administrative record file. Unit managers for the involved OU's or TSD's may also identify additional documents for inclusion in the administrative record".</p> <p>The previously identified method (paragraph to be removed) was not working well. The unit managers identified this method as an alternative to an administrative record discussion at each unit manager's meeting. The system has been in place for over two years. The change in the TPA is to document the current way of doing business.</p>	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
12.	Section 9.4, sixth paragraph on page 9-14, last sentence	<p>Reword the last part of the sentence to: "...repository, each project manager, and other interested parties."</p> <p>Other individuals receive a copy of the AR Index other than the administrative record files, the Public Information Repositories, and the project managers.</p>	
13.	Action Plan, Section 10.2	Update Public Information Repositories locations.	
14.	Action Plan, Section 11.3	<p>Adjust the requirements to reflect the production of an annual update which incorporates all approved changes and is then printed for mass distribution much the same way as the legal Agreement and Action Plan are handled. This would eliminate the public comment period. Current plans provide for much greater public involvement in future changes to the Tri-Party Agreement as they are developed. Public comment on changes (incorporated into the annual update) which the public has already commented on is largely redundant.</p>	
15.	Action Plan, Section 12.0	<p>Add wording to define what constitutes a "significant change" to the TPA, also include any specific requirements for public comment when a change is "significant".</p> <p>Note: The draft Community Relations Plan has added words to attempt to define this, the TPA should be consistent.</p>	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
16.	Various sections	Negotiate and incorporate necessary changes, requirements and/or milestones dealing with identified compliance issues.	
17.	Action Plan, Section 12.0	Modify current TPA change form approval block to identify which party has disapproved the change request in the case of a denied change request.	
18.	Action Plan, Section 12.0	Suggestion has been made that a sign off space be added to the current TPA change form approval block for the respective project managers to approve Class I changes. This was viewed as a possible improvement within the agencies for more timely approval by the original signers of the TPA (required for approval of class I changes).	
19.	As Appropriate	Add language specifying which agency shall maintain files of "original signature documents" which change or modify the TPA. Currently EPA Region X is filing all recently generated "originals".	
20.	As Appropriate	Add language specifying when the 7 day "clock" time period begins. Currently the regulatory agencies have 7 days to respond to a proposed change request or the change request is considered approved as submitted. The starting period for the 7 day clock is not clearly defined in all cases and can be difficult to determine such as when telefax's are used.	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
21.	As Appropriate	The Federal Facilities Compliance Act (FFCA) may have created the need for changes in the TPA. Currently the impact of the FFCA on the TPA is uncertain.	
22.	Article XV "Resolution of Disputes"	It has been proposed that revised language be added that minimizes either EPA-HQ or DOE-HQ involvement in disputes -- at least as a formal player.	
23.	Article VII "Work", Paragraph 28	With relation to the Federal Facilities Compliance Act this paragraph may or may not require modification.	
24.	Article XLVIII "Funding", Paragraph 139, subparagraph C.	Modify subparagraph C if necessary.	
25.	Action Plan Section 9.0 "Documentati on and Records"	A better definition of a primary document is needed. Examples of the questions to be answered are enforceability of primary documents and change control for primary documents.	
26.	As Appropriate	Clarification of Surplus Facilities language is needed.	
27.	As Appropriate	Appendix F in process of being revised. Will probably result in multiple changes to the text (identifying application of documents listed in Appendix F to the appropriate areas of the TPA). Also questions of appropriate change control to the documents listed in Appendix F exist.	

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Comments
28.	Attachment 3 to the TPA	Mutual Funding Agreement appears to expire on 9-30-93. Question exists of whether an update and extension of some sort is appropriate.	
29.			
30.			
31.			

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POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Lead/Team	Comments	3-31-93
1.	Action Plan, Section 2.0 Figures 2-1, 2-2 and 2-3	Modify figures to reflect approved changes to milestones M-01, M-02, M-12, M-13, M-14, M-17A&B, M-18, M-24, M-25, and M-31 (potentially M-19).	R. Morrison	This change on hold pending outcome of TWRS negotiations.	
2.	Action Plan, Section 2.0 Tables 2-1, 2-2 and 2-3	Modify tables to reflect approved changes to milestones M-14, M-17A&B, M-18, M-24, and M-25.	R. Morrison		
3.	Action Plan Section 7.0	Incorporate changes resulting from implementation of the Hanford Past Practice Investigation Strategy.	D. Teal M. Thompson P. Day		
4.	Action Plan, Section 9.2.1, Table 9-1	Update Table 9-1 to reflect documents which are now primary documents such as documents declared primary within negotiated milestones (e.g. LDR Plan Reports) (LDR Plan itself?).	R. Morrison		
5.	Section 9.3, last paragraph, third sentence	Remove "For RI/FS and RFI/CMS work plans," and begin sentence with "The change notice...". This change is intended to acknowledge the fact that all changes included in unit manager meeting minutes are thereby included in the administrative record.	R. Morrison		

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POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

TPA Section Purpose of Amendment Lead/Team Comments 3-31-93

6.	Section 9.4, first bullet on page 9-10	<p>Correct the RL administrative record address. Replace "345 Hills Street (off George Washington Way)" with "740 Stevens Center".</p> <p>The administrative record has moved into the 740 Stevens building in the November/December 1992 time frame.</p>	R. Morrison	
7.	Section 9.4, fifth paragraph, third sentence	<p>Remove this sentence in its entirety. This sentence begins with "Hard copies will...".</p> <p>Only microfilm is provided to EPA and Ecology.</p>	R. Morrison	
8.	Section 9.4, fifth paragraph, fourth sentence	<p>Remove "Every 6 months,". Add "continually" between "be" and "provided".</p> <p>Microfilm copies of the latest documents included in the administrative record files are provided to EPA and Ecology as it is processed.</p>	R. Morrison	

9513339-0754

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Lead/Team	Comments	3-31-93
9.	Section 9.4, sixth paragraph (last on page 9-10)	<p>Add the following sentences between the first and second sentences: "Because of space limitations, the hard copy of laboratory analytical data packages may be retained in alternate storage locations on the Hanford Site".</p> <p>The EPA guidance allows administrative record documents to be in microform or hard copy. Space limitations mandate the ability to house laboratory analytical data packages in locations other than the master AR files. It is anticipated that the data packages will be microfilmed and the hard copy transmitted to the Records Holding Area for long term retention.</p>	F. Calapristi	<p>Proposal from the Project Managers to use the following wording: "Data to be available on request to public".</p> <p>A letter will be forwarded to EPA and Ecology requesting approval of this procedure.</p>	

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POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Lead/Team	Comments	3-31-93
10.	Section 9.4, eighth paragraph (first set of bullets on page 9-11)	<p>Add the following bullet to the end of the list: " o Public comments and lead regulatory agency responses (if no comments are received, a letter from the lead regulatory agency shall be written to document that fact)".</p> <p>Public participation is a vital part of the overall cleanup process. It is necessary to include public comments in the AR and it is beneficial to also include the responses. If no comments are received, it is very beneficial from a public perception viewpoint that it is clearly stated that no public comments were received.</p>	R. Morrison	Proposal from the Project Managers to alternately add another item on page 9-13 for clarification to read "for public comment documents".	

9513338-0756

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Lead/Team	Comments	3-31-93
11.	Section 9.4, third paragraph on page 9-14	<p>Remove this paragraph and replace with the following: "Documents meeting the AR criteria and identified with one or more OU's or TSD's will be placed on an Administrative Record Candidate Review List. The list will be provided each month to all three unit managers responsible for the involved OU or TSD unit. This list will include the potential administrative record documents that have been received by the administrative record in the prior month.</p> <p>Unit managers for the involved OU's or TSD's shall review the Administrative Record Candidate Review List and identify documents to be included in the administrative record file. Unit managers for the involved OU's or TSD's may also identify additional documents for inclusion in the administrative record".</p> <p>The previously identified method (paragraph to be removed) was not working well. The unit managers identified this method as an alternative to an administrative record discussion at each unit manager's meeting. The system has been in place for over two years. The change in the TPA is to document the current way of doing business.</p>	R. Morrison		3-31-93

9513338-0757

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Lead/Team	Comments	3-31-93
12.	Section 9.4, sixth paragraph on page 9-14, last sentence	<p>Reword the last part of the sentence to: "...repository, each project manager, and other interested parties."</p> <p>Other individuals receive a copy of the AR Index other than the administrative record files, the Public Information Repositories, and the project managers.</p>	R. Morrison		3-31-93
13.	Action Plan, Section 10.2	Update Public Information Repositories locations.	R. Morrison		3-31-93
14.	Action Plan, Section 11.3	<p>Adjust the requirements to reflect the production of an annual update which incorporates all approved changes and is then printed for mass distribution much the same way as the legal Agreement and Action Plan are handled. This would eliminate the public comment period. Current plans provide for much greater public involvement in future changes to the Tri-Party Agreement as they are developed. Public comment on changes (incorporated into the annual update) which the public has already commented on is largely redundant.</p>	<p>J. Stohr J. Yerxa R. Morrison</p>	<p>The key Public Involvement Officers have been requested to provide a recommendation to the Project Managers on this change prior to proceeding.</p>	3-31-93

951338 0759

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

TPA Section Purpose of Amendment Lead/Team Comments 3-31-93

15.	Action Plan, Section 12.0	Add wording to define what constitutes a "significant change" to the TPA, also include any specific requirements for public comment when a change is "significant". Note: The draft Community Relations Plan has added words to attempt to define this, the TPA should be consistent.	R. Morrison	The Project Managers have recommended that definition of significant changes be done by an appropriate reference to the Community Relations Plan.
16.	Various sections	Negotiate and incorporate necessary changes, requirements and/or milestones dealing with identified compliance issues.	P. Day T. Tebb TBD	
17.	Action Plan, Section 12.0	Modify current TPA change form approval block to identify which party has disapproved the change request in the case of a denied change request.	R. Morrison	
18.	Action Plan, Section 12.0	Suggestion has been made that a sign off space be added to the current TPA change form approval block for the respective project managers to approve Class I changes. This was viewed as a possible improvement within the agencies for more timely approval by the original signers of the TPA (required for approval of class I changes).		Deleted. The Project Managers have determined that this change would not benefit the change process. This is because no principal signatory to the TPA (Class I changes) would approve a change without appropriate backup documentation, making this change redundant.

9513338 0759

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

TPA Section Purpose of Amendment Lead/Team Comments 3-31-93

19.	As Appropriate	Add language specifying which agency shall maintain files of "original signature documents" which change or modify the TPA. Currently EPA Region X is filing all recently generated "originals".	A. Boyd/ P. Day T. Barnett R. Carosino	
20.	As Appropriate	Add language specifying when the 7 day "clock" time period begins. Currently the regulatory agencies have 7 days to respond to a proposed change request or the change request is considered approved as submitted. The starting period for the 7 day clock is not clearly defined in all cases and can be difficult to determine such as when telefax's are used.	P. Day S. Wisness D. Jansen R. Morrison	Project Managers have suggested that in addition to this potential change that the time period be changed to 14 days since 7 days has not proven to be workable. Also official inclusion of the recently developed Interagency Change Board in the TPA has been suggested.
21.	As Appropriate	The Federal Facilities Compliance Act (FFCA) may have created the need for changes in the TPA. Currently the impact of the FFCA on the TPA is uncertain.	A. Boyd/ P. Day T. Barnett R. Carosino/ S. Wisness	
22.	Article XV "Resolution of Disputes"	It has been proposed that revised language be added that minimizes either EPA-HQ or DOE-HQ involvement in disputes -- at least as a formal player.	A. Boyd/ P. Day T. Barnett R. Carosino/ J. Bauer	
23.	Article VII "Work", Paragraph 28	With relation to the Federal Facilities Compliance Act this paragraph may or may not require modification.	A. Boyd/ P. Day T. Barnett P. Krupin	

0513330-0760

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

TPA Section Purpose of Amendment Lead/Team Comments 3-31-93

24.	Article XLVIII "Funding", Paragraph 139	Modify paragraph 139 if necessary.	P. Day R. Stanley S. Wisness	
25.	Action Plan Section 9.0 "Documentation and Records"	A better definition of a primary document is needed. Examples of the questions to be answered are enforceability of primary documents and change control for primary documents.	D. Einan D. Nylander K. Thompson	
26.	As Appropriate	Clarification of Surplus Facilities language is needed.	D. Sherwood R. Stanley S. Wisness	
27.	As Appropriate	Appendix F in process of being revised. Will probably result in multiple changes to the text (identifying application of documents listed in Appendix F to the appropriate areas of the TPA). Also questions of appropriate change control to the documents listed in Appendix F exist.	D. Sherwood J. Stohr F. Calapristi	
28.	Attachment 3 to the TPA	Mutual Funding Agreement appears to expire on 9-30-93. Question exists of whether an update and extension of some sort is appropriate.	T. Barnett J. Yerxa	

9513330-0761

POTENTIAL AMENDMENTS TO THE TRI-PARTY AGREEMENT

#	TPA Section	Purpose of Amendment	Lead/Team	Comments	3-31-93
29.	Various	Number of Operable Units in original TPA was 74. This number appears in various locations and must be updated to current count of Operable Units.	R. Morrison		
30.					
31.					

>>> In addition to the changes listed above the Three Agencies have taken the action to review the Tri-Party Agreement for other areas in need of change or updating.

9513338.0762

Change Number M-20-92-8	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 1/21/93
Originator M. J. Furman		Phone 376-7062
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Establish New Interim Milestone, M-20-51, for Submittal of T Plant Complex Part B Permit Application		
Description/Justification of Change <p>Establish a Tri-Party Agreement Milestone M-20-51 to read "Submit T Plant Complex Part B Permit Application to Ecology and the EPA," December 31, 1995.</p> <p>JUSTIFICATION: Page 2</p>		
Impact of Change <p>This change reflects the commitment to obtain a Part B permit application for the T Plant Complex.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order Action Plan-Appendix D, Table D-3 and Figure D-1.</p>		
Approvals <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved DOE _____ Date _____ EPA _____ Date _____ Ecology _____ Date _____		

JUSTIFICATION FOR DECEMBER 1995 SUBMITTAL
OF THE
T PLANT COMPLEX PART B PERMIT APPLICATION

The T Plant Complex currently is planning for the installation of Resource Conservation and Recovery Act (RCRA)-compliant double-walled tanks and ancillary equipment. The planned scope of this effort includes the T Plant Complex dangerous waste tanks, and associated waste transfer piping and instrumentation necessary to perform the T Plant Complex mission. The mission of the T Plant Complex is to perform decontamination services for the Hanford Site. The liquid waste generated during decontamination activities is collected in the T Plant Complex waste tank system. The installation of RCRA-compliant tanks will complete corrective action associated with deficiencies in the current tanks and piping system necessary for the continued operation of the T Plant Complex.

Project W-259 (T Plant Secondary Containment and Leak Detection Upgrades) has been initiated to upgrade the T Plant Complex and its operation by upgrading and/or replacing the existing dangerous waste tanks, piping, and operating control systems. The functional design criteria for Project W-259 are scheduled to be completed by June 1993. Also, a 'schedule of events' for completion of the T Plant Complex upgrades is to be completed by September 1993.

Submittal of the T Plant Complex Part B Permit Application in December 1995 will allow time to develop complete and technically correct design and operating data that are fully consistent with the future of the T Plant Complex.

(ATTACHMENT 2)



Environmental Management Operations

SOS Status Report to TPA Project Managers

March 26, 1993

9513338.0766

- **Provide SOS Background**
- **Summarize Findings and Recommendations**
- **Report Status of Implementation**
- **Generate Agreement on Next Implementation Actions**

- **Study mandated by TPA Dispute Resolution 8/91**

- **Battelle EMO assigned responsibility 3/92**
 - √ **Self-evaluation completed 8/92**

 - √ **Independent evaluation completed 9/92**

 - √ **Implementation plan prepared 12/92**

- **DOE and contractor management structure functions as a production operation**
- **Interpretations of regulations and requirements are overly conservative**
- **Little focus on site cleanup — working the process has become Hanford's goal rather than a means to a goal**
- **Lack of integration of ER and WM activities**

9513338.0769

- **Severe shortage of RL Environmental Restoration staff**
- **Parallel and vertical DOE and contractor organizations results in confusing lines of authority**
- **DOE unable to exercise appropriate oversight**
- **Mistrust and poor communication persist among TPA parties**

Schedule Optimization Study

Recommendations

Cross-Cutting Issues	Management Structure and Process	Technical Approach	Sampling and Analysis	Policy Legal Regulatory	Document Review Process	Procurement
Production culture						
Conservative Interp.						
Little focus on goals						
ER & WM Int.						
Shortage of RL-ER Staff						
Confusing Lines of Authority						
Lack of Oversight						
Poor Communication TPA						
Number of Recommendations	9	12	9	9	11	11

951338.077

Major Findings:

- **No single point of authority**
- **Lack of team integration**
- **Insufficient DOE ER staff onsite**
- **Fragmentation of contracts hampers accountability**

Major Recommendations:

- **Establish technical support team**
- **Streamline management organization and operations**
- **Review applicability of DOE orders to ER mission**
- **Do not make ERMC use services of other parallel contractors**

9513338.0772

Major Findings:

- **HPPS approach & macroengineering concept = streamlining of RI/FS process**
- **More emphasis on short-term vs. long-term**
- **Common activities at many sites**

Major Recommendations:

- **Implement HPPS**
- **Develop macroengineering concept**
- **Integrate data quality objectives for long-term cleanup activities**
- **Use commonalities to optimize schedules**

Major Findings:

- **Inexperienced staff conducting sampling and analysis**
- **Inadequate laboratory capacity = delays**
- **Limited field team leader authority**

Major Recommendations:

- **Have TST develop sampling & analysis strategy to improve quality**
- **Build LLMW facility; make HL radioactive testing laboratory operational**
- **Empower FTLs with authority**

951333B.0774

Major Findings:

- **NEPA Process = burdensome, little benefit**
- **Lack of integration between NEPA & CERCLA**
- **Lack of integration between RCRA & CERCLA**

Major Recommendations:

- **Reconsider policy applying NEPA to CERCLA**
- **Focus Hanford EIS away from cleanup technologies and toward long-term site use**
- **Seek integration & flexibility for RCRA/CERCLA activities**

9513338.0775

Major Findings:

- **Multiple reviews = lack of trust**
- **Lack of direction to reviewers**
- **HPPS is effective basis for streamlining cleanup**

Major Recommendations:

- **Use team approach to document preparation from scoping onward**
- **Define purpose of each level of review**
- **Implement HPPS and commit to revised milestones and OU/OA redesignations**

Major Findings:

- ER mission not shared by procurement
- Conservative procurement practices and regulations delay schedules
- Procurement rewards and incentives not related to ER mission

Major Recommendations:

- Make procurement staff part of ER team effort
- Review conservative procurement practices & regulations
- Develop long-term contracting plan
- Integrate incentives for ER goals into award fee

9513338.0777

- **46 recommendations require changes by DOE alone**
 - √ **DOE Policy**
 - √ **DOE/Contractor organizational**

- **15 recommendations**
 - √ **Document review**
 - √ **TPA milestones**

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- **Results presented to John Wagoner December 1992**
- **Draft Implementation Plan submitted December 1992**
- **SOS Final Report presented to EPA and Ecology early January 1993**
- **SOS results presented to Unit Managers meeting in March 1993**
- **Background information package on recommendations completed March 1993**
- **DOE interested in addressing ER-specific recommendations as part of ER rebaselining effort**

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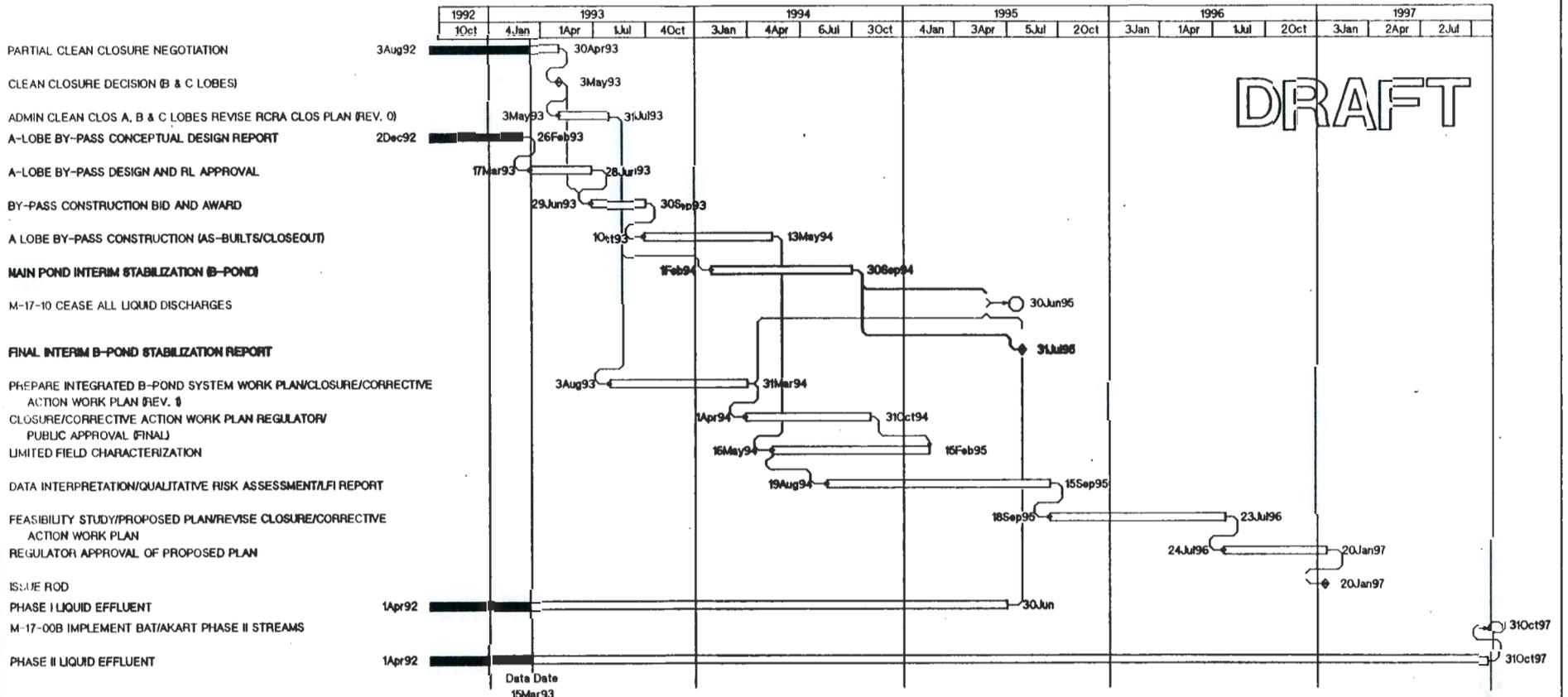
- **Implementation is a major effort**
- **DOE staff unavailable to address recommendations**
- **Contractor, without DOE leadership, cannot implement major recommendations**
- **Implementation will require participation of all parties**

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- **SOS has received high marks by all**
- **Could lead to savings of \$ billions, years**
- **Implementation of SOS is critical or SOS is at risk of being “another study put on the shelf”**
- **TPA partners need to decide how to proceed with implementation**

B-POND SYSTEM INTEGRATED SCHEDULE

DRAFT



951338.0782

EFFLUENT — CERCLA — LIQUID EFFLUENT —
 RCRA — RARA — STREAMS —
 TPA MILESTONE ○

SYNOPSIS
of the
RCRA TSD AND RCRA PAST-PRACTICE INTEGRATION

PURPOSE: The purpose of this proposed change is to integrate the Resource Conservation and Recovery Act (RCRA) treatment, storage, or disposal (TSD) and RCRA Past-Practice waste management units in the 200-BP-11 Operable Unit into one common work plan and to coordinate all work so that the Tri-Party Agreement Milestone M-17-10 can be met. This milestone requires that all liquid discharges cease to hazardous land disposal units unless such units have been clean closed in accordance with RCRA by June 1995.

216-B-3 Pond System: The 216-B-3 Pond System is identified as a RCRA TSD unit that will be closed in accordance with applicable laws and regulations. The 216-B-3 Pond System is considered an interim status, surface impoundment disposal unit. The 216-B-3 Pond System consists of four ponds and a portion of the 216-B-3-3 Ditch. Clean closure is the planned option for a portion of the 216-B-3 Pond System: the 216-B-3A, 216-B-3B, 216-B-3C expansion ponds.

200-BP-11: The 200-BP-11 Operable Unit, which includes the entire 216-B-3 Pond System, is located in the north-eastern portion of the 200 East Area. The operable unit currently consists of eight waste management units and four unplanned releases and encompasses approximately 775 acres (1.2 mi²).

Main Points:

- * It will be useful and makes technical as well as administrative sense to integrate the 216-B-3 Pond System closure activities with the 200-BP-11 RCRA Past Practice Operable Unit work.
- * It is important that all parties reach agreement that the 216-B-3A, 216-B-3B and 216-B-3C expansion ponds (in particular 216-B-3B and 216-B-3C) be allowed to be administratively clean closed in time to meet the Tri-Party Agreement Milestone M-17-10. (The desired decision date is May 3, 1993, before more substantial work starts on the 216-B-3A bypass.)
- * All parties need to agree that the 200-BP-11 Operable Unit will be one of the next six operable units addressed as new scope for FY 1994. (If this decision can be made by May 3, 1993, and all parties approve the schedule, actual work on an integrated work plan could begin in August 1993.)
- * The groundwater under Operable Unit 200-BP-11 will be handled under another operable unit and Operable Unit 200-BP-11 will address all source units.

ACHIEVEMENTS:

- Allows clean closure of the ponds for continued discharge of non-dangerous liquid effluents
- Achieves concurrence with Milestone M-17-10 for these ponds as required
- Less resources will be used
- Leads towards a coordinated strategy for any possible remedial actions

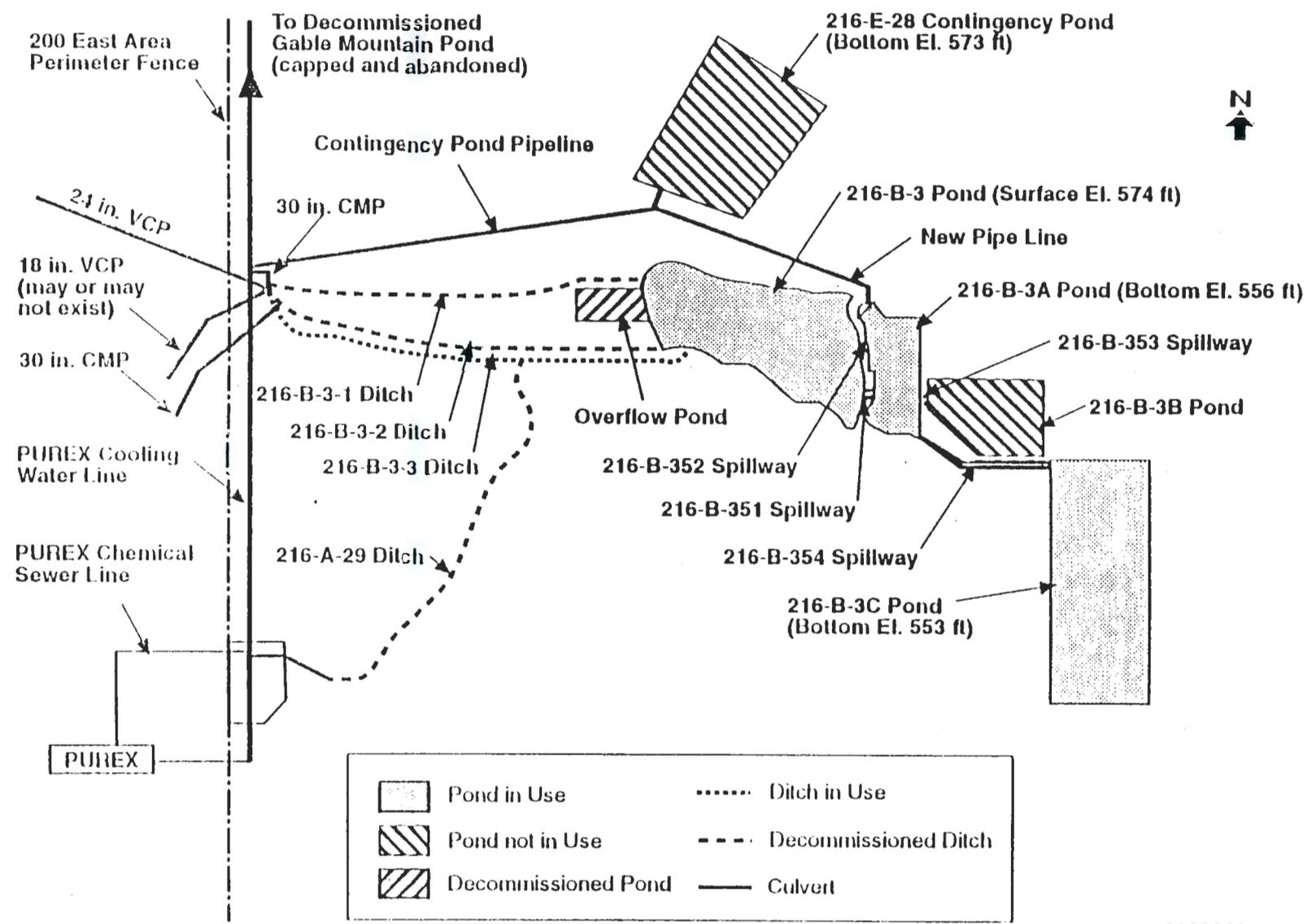


Figure 2. Map of the 216-B-3 Pond System Location.

**POSITION PAPER
ADMINISTRATIVE CLEAN CLOSURE OF THE 216-B-3 POND
SYSTEMS, POND A, POND B, AND POND C**

BACKGROUND

The 216-B-3 Pond System consists of a series of four earthen, unlined, interconnected ponds and the 216-B-3-3 Ditch that receive waste water from various 200 East Area operating facilities. These four ponds, collectively referred to as B Pond, are designated the 216-B-3, 216-B-3A (3A), 216-B-3B (3B), and the 216-B-3C (3C) Ponds. These ponds were placed into service in 1945, 1983, 1983, and 1985, respectively. 216-B-3 Pond System is located on the 200 Area plateau approximately 7 miles from the Columbia River.

The 200-BP-11 Operable Unit, which includes the entire 216-B-3 Pond System, is located in the north-eastern portion of the 200 East Area. The operable unit currently consists of eight waste management units and four unplanned releases and encompasses approximately 775 acres (1.2 mi²).

The 216-B-3 Pond, approximately 35 acres, and the open section of the 216-B-3-3 Ditch, approximately 3,700 feet, are the two waste management units proposed to be integrated with the RCRA Past-Practice Units.

A preliminary closure/postclosure plan for the 216-B-3 Pond System was submitted to Ecology in 1987 (DOE 89-28). Another version of the closure/postclosure plan (Rev. 0) was submitted in March 1990 in order to meet the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Milestone M-20-09.

DISCUSSION

Since the submittal of the closure/postclosure plan to Ecology, RL/WHC have been negotiating to clean close the 3A, 3B, and 3C Ponds and interim stabilize the 216-B-3 Pond and the 216-B-3-3 Ditch with cleanup deferred to the operable unit. There have been three (3) sampling events. Phase 1 sampling took sediment and water samples from all of the ponds and the 216-B-3-3 Ditch in 1989. Phase 2 took sediment and water samples (Ecology took 100% split samples) from 3A, 3B, and 3C Ponds in September 1992. Phase 3 took vadose zone samples for 3A, 3B, and 3C Ponds in 1991. Evaluation of the analytical results indicate that the 3A, 3B, and 3C Ponds can be administratively "clean" closed.

The investigation of the 200-BP-11 operable unit is proposed to be initiated in 1994. Investigation and closure of the 3A, 3B and 3C Ponds is being initiated ahead of the 200-BP-11 operable unit to meet the Tri-Party Agreement, milestone M-17-10, "Cease all liquid discharges to hazardous land disposal units unless such units have been clean closed in accordance with RCRA" (Ecology et al. 1989). The date associated with this milestone is June 1995. Concurrence from Ecology is required by May 1993 to start the projects necessary to support the requirement to cease all liquid discharges to the 216-B-3 Pond and the 216-B-3-3 Ditch by June 1995. There are two projects

planned in support of this milestone; construction of a bypass around the 216-B-3A Pond and interim stabilization of the 216-B-3 Pond (and possible interim stabilization of the 216-B-3A Pond). Interim stabilization is a radiological safety requirement when there is a possibility of radionuclide contamination in the soil. These two projects are currently in design phase with construction of the 216-B-3A Pond Bypass starting at the end of FY 93.

PROPOSED SOLUTION

The following summarizes the closure strategy that is being proposed for the 216-B-3 Pond System.

- Administratively Clean Close the 216-B-3A, 216-B-3B and 216-B-3C Ponds. Clean close as used in this context means that no dangerous waste or dangerous waste contaminated soil, structures, or equipment will remain onsite that pose a threat to human health or the environment.
- The 216-B-3B and 216-B-3C ponds will receive nondangerous waste water via a bypass constructed to divert the liquid discharges that currently flow through the 216-B-3-3 Ditch, 216-B-3 Pond, and 216-B-3A Pond.
- Remove the remaining 216-B-3 Pond and the 216-B-3-3 Ditch from service and take interim actions to stabilize any waste in place. Interim stabilization is necessary and appropriate for the 216-B-3 Pond and the 216-B-3-3 Ditch. These units potentially have radioactive contaminated sediments. During the interval between the cessation of liquid discharge and any possible remedial action, stabilization is required to prevent the possible spread of contamination due to dry sediments being carried by the winds. Partial closure of the remaining TSD unit (216-B-3 Pond and 216-B-3-3 Ditch) which has not been clean closed will be coordinated and integrated with the 200-BP-11 operable unit which includes two nearby inactive, waste management units (i.e., 216-B-3-1 and 216-B-3-2 Ditches). Evaluation of data shows that the 216-B-3A Pond can also be clean closed but this pond will remain inactive to serve as a buffer zone between the active ponds (216-B-3B and 216-B-3C) and the 216-B-3 Pond.
- Characterization of the 216-B-3 Pond System for closure and the 200-BP-11 operable unit would be achieved by an integrated RCRA Work Plan. All of the proposed units, RCRA TSD and RCRA Past Practice, have received similar waste streams. The RCRA Past-Practice and the RCRA TSD Closure/Postclosure work would be integrated where there is overlapping work (e.g., sampling, cleanup, negotiating, landfill cover design, etc.). Characterization work could begin in FY 1994. The final schedule would be agreed upon after obtaining review and approval from both the RCRA and RCRA Past-Practice sides of Ecology, EPA, RL, HQ, and WHC. The final closure decisions for the RCRA TSD and RCRA Past Practice units would be documented in a Record of Decision.

- An integrated approach will allow the entire contiguous area to be closed to one cleanup standard. Under RCRA Past-Practice strategies, this would be a health based standard. The cleanup standards would address both the radioactive component and the dangerous waste component of the waste units. This would allow, with prior approval by all parties, for the work to proceed under the integrated RCRA work plan. The Data Quality Objectives will be defined to ensure that the samples will fulfill both the RCRA and RCRA Past-Practice requirements where appropriate and applicable. If the remedy selected is for a landfill cover, the cover design will be agreed upon by all parties and will be a RCRA equivalent design. There will be provisions in the integrative process that will allow for any necessary RCRA TSD unit requirements, such as a postclosure plan, to be included. In addition, the plan would include provisions for any necessary legal sign-offs by the regulatory agencies.

DRAFT

Change Number	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date March , 1993
Originator R.K. Tranbarger	Phone 372-1258	
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Submit Integrated 200-BP-11 Source Operable Unit and RCRA Past-Practice/TSD Work Plan		
Description/Justification of Change See Attached		
Impact of Change The 216-B-3 Pond System Closure/Postclosure Plan, Rev. 0, was submitted in March 1990 per Tri-Party Agreement Milestone M-20-09. This plan will be incorporated and completed under the 200-BP-11 RCRA Past-Practice/TSD Operable Unit Work Plan. Groundwater beneath the 200-BP-11 Operable Unit will be addressed under a separate groundwater operable unit.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix C (Prioritized Listing of Operable Units), and Appendix D (Work Schedule).		
Approvals ___ Approved ___ Disapproved DOE _____ Date _____ EPA _____ Date _____ Ecology _____ Date _____		

ACCELERATED REMEDIAL ACTION FOR THE 200-BP-11 OPERABLE UNIT

This *Hanford Federal Facility Agreement And Consent Order* (Tri-Party Agreement) Change Request provides the justification for the prioritization and integration of the 200-BP-11 Operable Unit Work Plan.

The purpose of this change request is to integrate the Resource Conservation and Recovery Act (RCRA)-treatment, storage, or disposal (TSD) (216-B-3 Pond System) and RCRA Past-Practice waste management units in the 200-BP-11 Operable Unit into one common work plan. This integration supports the recommendations provided in the B Plant Source Aggregate Area Management Study Report (DOE/RL-92-05) and is consistent with the Hanford Site Past-Practice Investigation Strategy (DOE/RL-91-40).

200-BP-11 Operable Unit Background

The 200-BP-11 Operable Unit is located in the north-eastern portion of the 200 East Area. The operable unit currently consists of eight waste management units and four unplanned releases, and encompasses approximately 775 acres (1.2 mi²). The 200-BP-11 waste management units are mainly associated with low level waste streams from the 221-B (B Plant) and 202-A (PUREX Plant) Buildings.

Five of the eight waste management units are active RCRA-TSD Units and are listed in the Tri-Party Agreement. These units are collectively referred to as the 216-B-3 Pond System and consist of the 216-B-3, -3A, -3B, and -3C Ponds and the 216-B-3-3 Ditch, and currently, all but the 216-B-3B Pond contain surface water. The 216-B-3 Pond System dominates the operable unit waste area encompassing approximately 89 acres. A closure/postclosure plan (DOE/RL 89-28) has been written for these units and submitted to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) in March 1990 in compliance with Tri-Party Agreement Milestone M-20-09.

The remaining three waste management units and two of the four unplanned releases are inactive RCRA Past-Practice sites as listed in the Tri-Party Agreement. They are referred to as the 216-B-3-1 and -2 Ditches, the 216-E-28 Pond (Contingency Pond), and unplanned releases UN-200-E-14 and -92. The 216-B-3-1 and -2 Ditches discharged to the 216-B-3 Pond System in the past and have been out of service since 1964 and 1970, respectively. The 216-E-28 Pond encompasses about 30 acres and has never been used. Unplanned release UN-216-E-14 occurred when a dike broke at the 216-B-3 Pond in 1958, and unplanned release UN-216-E-92 surfaced in 1980 as a result of contaminated Russian Thistle and has since been removed.

The remaining two unplanned releases, UPR-200-E-34 and -51, are not listed in the Tri-Party Agreement but are associated with waste management units within the 200-BP-11 Operable Unit. Unplanned release UPR-200-E-34 occurred in 1964 as a result of a coil leak from a tank at the PUREX Plant and is associated with the 216-B-3-1 Ditch and the 216-B-3 Pond. Unplanned release UPR-200-E-51 occurred in 1977 as a result of storage tank leak from the PUREX Plant and is associated with the 216-B-3-3 Ditch and the 216-B-3 Pond.

200-BP-11 Work Plan Strategy

The 216-B-3 Pond System Closure/Postclosure Plan (DOE/RL 89-28) defines the 216-B-3 Pond System as a group of RCRA-TSD waste management units (216-B-3, -3A, -3B, & -3C Ponds, and a portion of the 216-B-3-3 Ditch) and has been written and submitted to Ecology and the EPA (Tri-Party Agreement Milestone M-20-09). The analytical results from the sampling performed under this work plan indicate that the 216-B-3A, -3B and -3C Ponds are "clean", and therefore can undergo "clean closure" under the RCRA guidelines. Therefore, it is recommended that the 216-B-3 Pond and the 216-B-3-3 Ditch be incorporated into a common plan (i.e., the Integrated 200-BP-11 Source Operable Unit and RCRA Past-Practice/TSD Work Plan) to integrate all future investigation and remediation activities associated with the 216-B-3 Pond System. A new Tri-Party Agreement milestone of March 1994 is recommended for the submittal of the work plan to Ecology and EPA.

In support of this strategy, the 200-BP-11 groundwater and source areas must be separated into different operable units. This would allow accelerating the remedial action for the source area while not impeding further investigation of the groundwater, if required. The 200-BP-11 groundwater investigation would be transferred to a separate operable unit as recommended in the 200 East Groundwater Aggregate Area Management Study Report (DOE/RL-92-19).

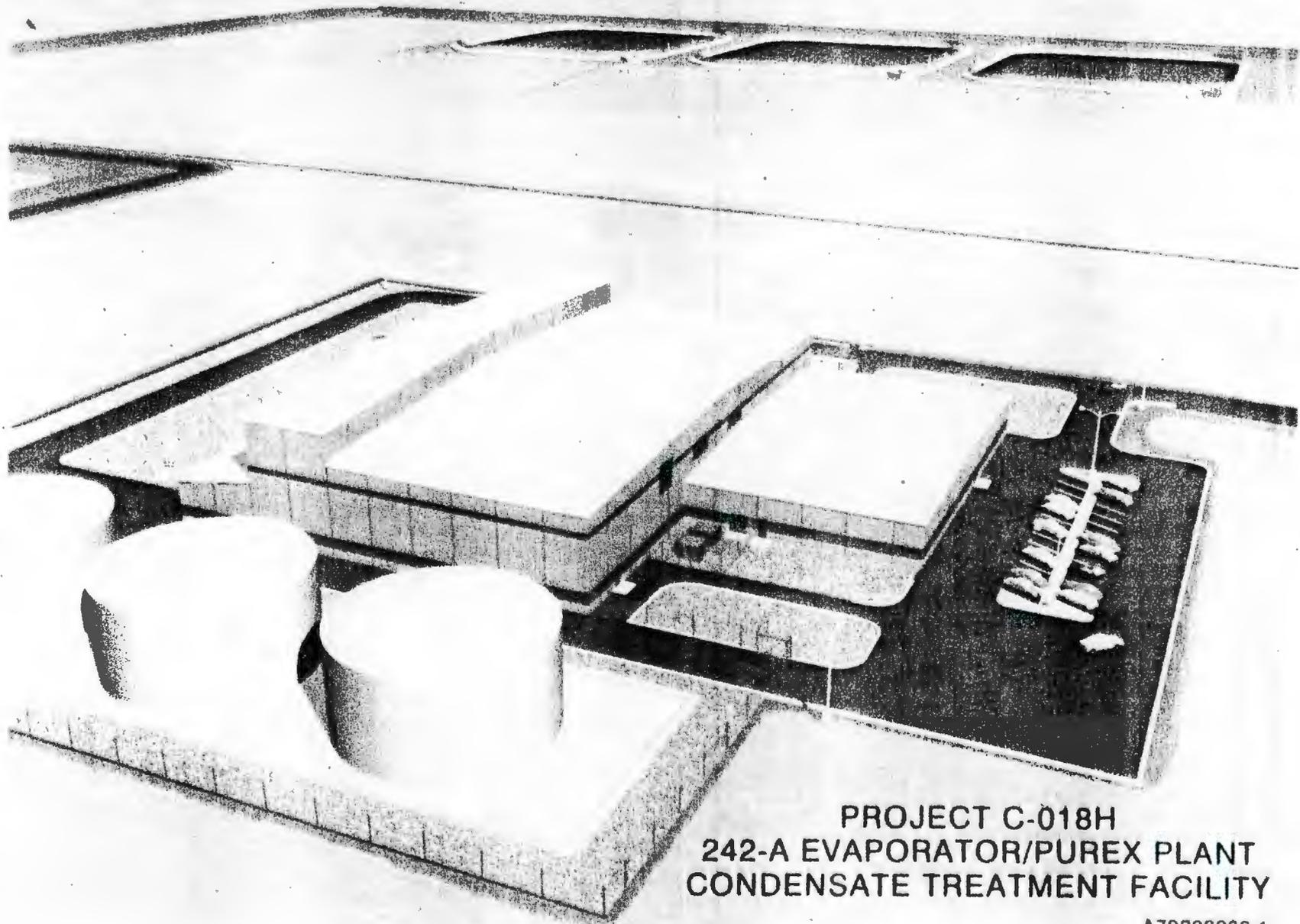
One advantage of this strategy is that it will allow Tri-Party Agreement Milestone M-17-10, "Cease liquid discharges to hazardous waste land disposal units unless such units have been clean closed in accordance with RCRA," to be achieved ahead of its June 1995 due date. It is foreseen that this will be accomplished by achieving clean closure of the 216-B-3A, 216-B-3B, and 216-B-3C expansion ponds. The liquid effluent discharges to the 216-B-3-3 Ditch and the 216-B-3 Pond will be ceased, thus allowing the surface water to dissipate. The effluent streams are planned to be rerouted to the 216-B-3A Pond utilizing the bypass pipeline system currently in place. Meanwhile, a new 216-B-3A bypass system will be constructed to reroute the effluents streams to the 216-B-3B and -3C Ponds. Upon completion of the 216-B-3A Pond bypass system, the effluents will be discharged solely to the 216-B-3B and -3C Ponds and the 216-B-3A Pond will become an inactive facility.

In summary, the 216-B-3A, 216-B-3B, and 216-B-3C expansion ponds will achieve clean closure status by June 1995; the continued liquid effluent discharges will be rerouted to the 216-B-3B and 216-B-3C expansion ponds by June 1995; and the surface water in the 216-B-3 and the 216-B-3A ponds and the 216-B-3-3 Ditch will dissipate by June 1995.

TPA Changes Resulting From The Integrated 200-BP-11 Work Plan

Appendix C. Change priority for 200-BP-4 to 18 and the priority for 200-BP-11 to 17.

Appendix D. Add new milestone: Submit Integrated 200-BP-11 Source Operable Unit and RCRA Past-Practice/TSD Work Plan to Ecology and EPA. Due date March 1994.



9513338-0791

**PROJECT C-018H
242-A EVAPORATOR/PUREX PLANT
CONDENSATE TREATMENT FACILITY**

A79208066.1

DESIGN BASIS
EFFLUENT TREATMENT FACILITY
(PROJECT C-018H)

Process Engineering
March 26, 1993

9513338.0792

PROJECT SUMMARY

- **Designed and built by Japan Gas Company (JGC)**
 - **150 GPM capacity**
 - **40,000 ft² building**
 - **\$52 million TEC**
- **Treat 242-A Process Condensate**
 - **Up to 13 million gallons stored in LERF**
- **Soil column disposal north of 200 West Area**
 - **Selected to allow time for the decay of Tritium**

951333B.0793

BAT/AKART EVALUATION

- **Followed procedure in WHC BAT Guidance Document**
 - **Evaluation documented in Engineering Alternative Report (WAC 173-240 Report)**
 - **Selected BAT/AKART**
 - **Primary Filtration**
 - **Acidification**
 - **UV/Oxidation**
 - **Degasification**
 - **Secondary Filtration**
 - **Reverse Osmosis**
 - **Ion Exchange**
 - **pH Adjustment**

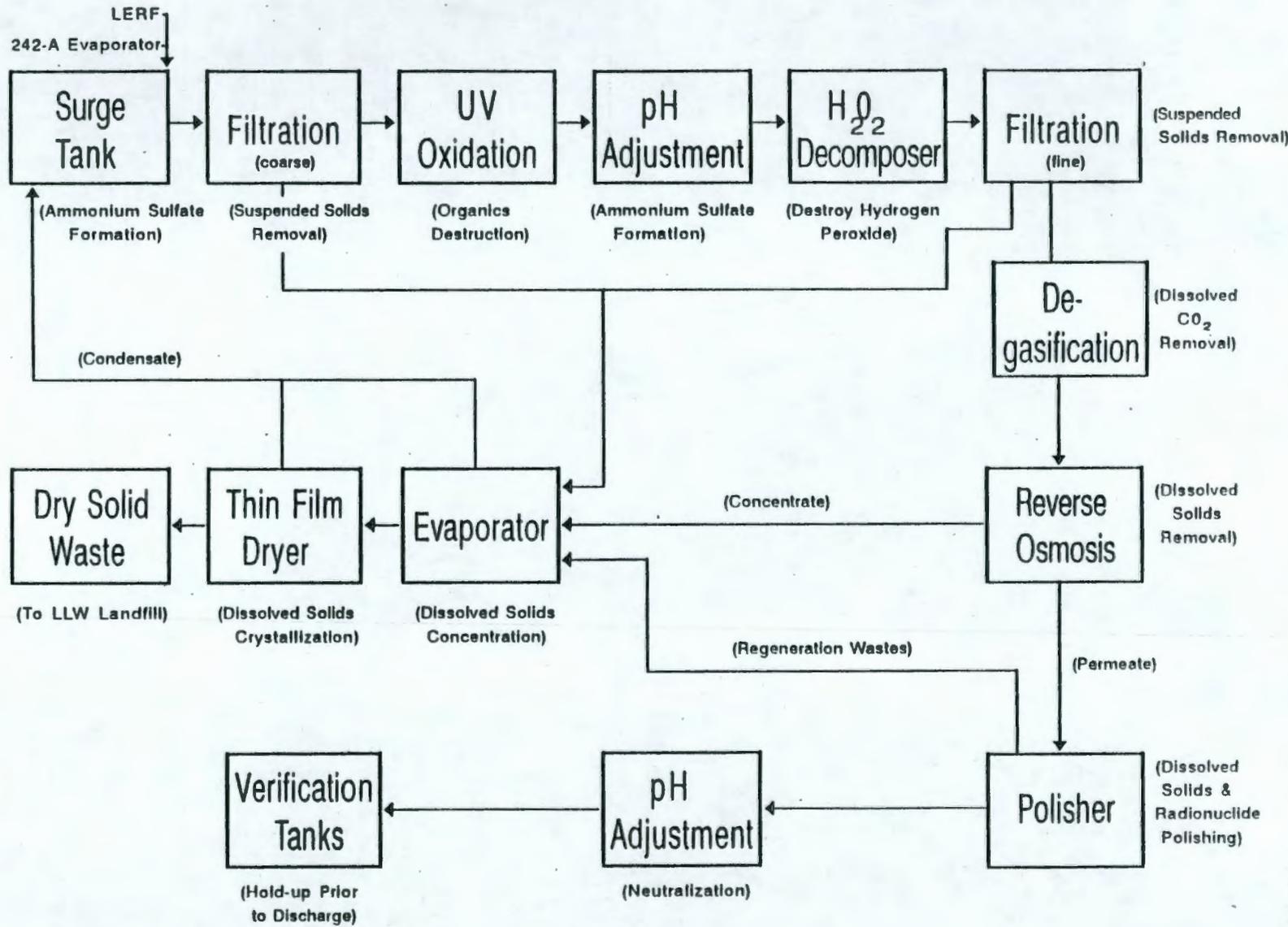


Figure 2-3. Process Flow Diagram.

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DESIGN BASIS

- **Sampling and analysis of feed is not possible**
 - **Evaporator in standby**

- **Source term basis**
 - **Samples collected between August 1985 and March 1989**
 - **Process control samples**
 - **Process knowledge**

- **Design treatment levels (targets)**
 - **Used to guide design (size equipment)**
 - **Conservative (low) estimate of release limits**

DESIGN BASIS (cont)

- **Treatment target basis**
 - **Groundwater Protection Standards**
 - **Safe Drinking Water Act Levels**
 - **BDAT Limits for LDR Wastes**

ORGANIC TREATMENT ALTERNATIVES

- **Alternatives Evaluated**
 - **UV Oxidation**
 - **Granulated Activated Carbon (GAC)**
 - **UV Oxidation with GAC polishing**

UV OXIDATION CONSIDERATIONS

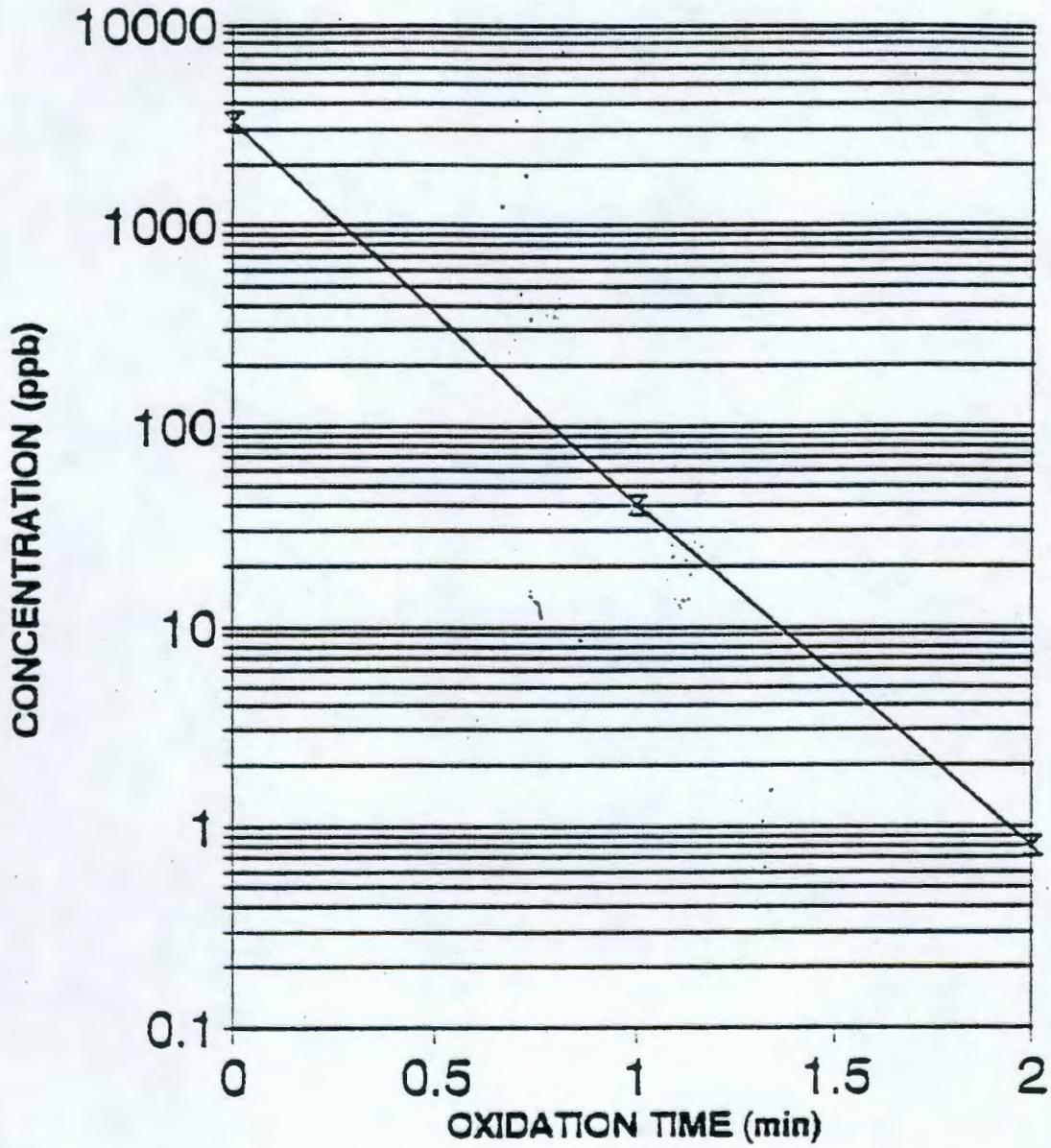
- **Predictable Process**
 - **First order kinetics**

- **Process Considerations**
 - **Organic Concentrations**
 - **Type of Organics**
 - **Inorganic Matrix**
 - **Flow rate (reaction time)**

- **Vendor tests used to size ETF UV/Oxidation Unit**

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UV/OXIDATION KINETICS



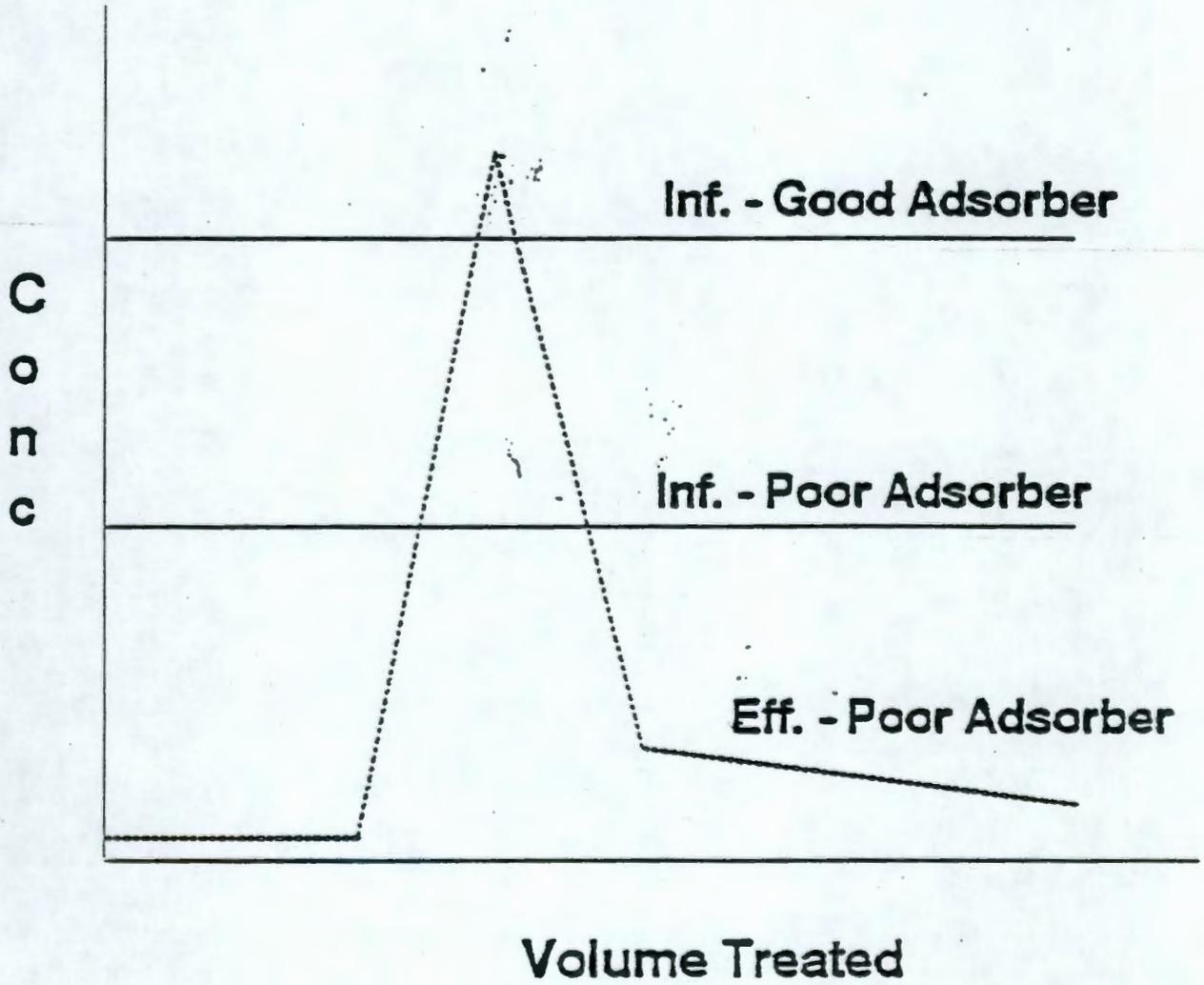
UV OXIDATION CONSIDERATIONS (cont.)

- **Operational Flexibility**
 - **Flow rate**
 - **Peroxide Dose**
 - **Predictive Tests**
- **Contaminants Destroyed**

GAC CONSIDERATIONS

- **Some organics poorly adsorbed**
 - **Acetone, carbon tetrachloride,
1,1,1-trichloroethane, chloroform**
- **Less Capacity at lower concentrations**
 - **GAC usage may increase**
- **Mixtures show lower capacity**
- **Chromatographic effects**

Chromatographic Effects



GAC CONSIDERTIONS (cont.)

- **Organic contaminatnts transferred to another media, are not destroyed**
- **Significant volumes of spent GAC**
 - **Mixed waste**
 - **No treatment or disposal facilities**

GAC AS A POLISHER

- **Smaller UV Oxidation Unit**
 - **Incomplete oxidation**
 - **Poorly absorbed**
- **Significant amounts of spent GAC**
- **Difficult to size and predict performance**
- **Chromatographic effect may result in periods of poor treated waste quality**

COST COMPARISON

	<u>UV/OXIDATION</u>	<u>GAC</u>	<u>GAC POLISHING</u>
CAPITAL	\$1,200,000	\$600,000	\$1,200,000
<hr/>			
ANNUAL OPERATIONS			
POWER	144,000	NEG.	72,000
CHEMICAL	100,000	781,000	295,000
WASTE STORAGE	30,000	7,000,000	1,765,000
FINAL DISPOSAL	?	?	?
<hr/>			
OPERATING TOTAL	\$274,000	\$7,781,000	\$2,132,000

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SECONDARY WASTE VOLUMES

UV/OXIDATION

Negligible

GAC

625,000 lbs

21,700 ft³

GAC POLISHING

156,000 pounds

5,300 ft³

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CONCLUSION

- **GAC Polishing will not improve quality treated water quality**
- **GAC has significant secondary waste issues**
 - **Cost for storage**
 - **No available treatment or disposal methods**
- **GAC is not used as a polisher**
- **UV oxidation is the most flexible, reliable and cost effective technology for this application.**

1100 AREA TIMELINE

April 2nd	Fact Sheet, Newspaper Notice
April 7th	Documents to WHC for A.R.
April 12th	Public Comment Starts
April 29th	Public Meeting
May 28th	Public Comment Ends
June	Responsiveness Summary
July	Draft ROD to Ecology, DOE
August	Draft ROD Comment Resolution
August/Sept	ROD Issued