

MEETING MINUTES  
MAY 4 MEETING WITH ECOLOGY

The Westinghouse Hanford Company (WHC), U.S. Department of Energy, Richland Operations Office (RL), and the State of Washington Department of Ecology (Ecology) met on May 4, 1993 to review three recent Ecology letters on backlog waste. Attendees were:

Tom Tebb	W. H. Hamilton, Jr.
Casey Ruud	H. E. McGuire
Laura Russell	H. D. Harmon
Jim Bauer	Cliff Clarke
D. J. Swaim	Dennis Claussen
	Gene Senat



Conclusions were:

1. WHC/RL/Ecology did not see the backlog waste program the same way. Ecology saw it as a corrective action authorized by Ecology to correct a non-compliant accumulation practices at Tank Farms were accepted because the waste was being moved rapidly to the Central Waste Complex (CWC). The Backlog Waste Interim Storage (BWIS) process was viewed as a temporary designation that would be confirmed by further analysis (even for storage).
2. WHC viewed the backlog procedures as a RCRA compliant method of designating and moving waste to the CWC (as opposed to a corrective action). The procedure was applied to many generators, including Tank Farms. There was not unanimity inside WHC regarding WHC acceptance of non-compliant accumulation practices for backlog containers at Tank Farms. Other generators took action to correct accumulation practices. Further designation was not believed to be necessary for storage.
3. Both WHC and Ecology discussed use of the backlog procedure to move newly generated waste to the CWC. Ecology feels that the non-compliant accumulation practices for these containers were not accepted by Ecology and represent violations.
4. Ecology is considering compliance action on this issue although they are "not sure where we are".

Actions identified at the meeting were:

- a. Hank McGuire to set up Wagoner/Anderson meeting with Ecology so Ecology can give their views of backlog program.
- b. WHC/RL invited to call/meet Ecology to resolve issues (I find this interesting given Ecology's recent resistance to meetings prior to this one).
- c. Hamilton to get BART to explain to Laura Russell how just one PIN issued after December 31 while SWITS shows many dates after December 31. (Explanation attached).

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Other Pertinent Notes:

1. Ecology has gathered most of their data from documents and discussions at 209E and various Tank Farms. During visits just prior to their March 19 and April 15 letters, they reported observing newly generated waste (paint cans, air lance waste) that was being considered part of the backlog. This meant they were told it was part of the backlog and the accumulation methods were non-compliant.
2. Ecology has received April 21 RL letter indicating newly generated waste was shipped to the CWC using backlog processing procedures.
3. Ecology feels as if they were misled by people that answered their questions about newly generated waste being in the backlog.
4. Ecology (Rudd) feels that oversight people may not have been listened to (although Dan Swaim may have addressed that fully) or may have not played the proper role.
5. Ecology noted that people who raised issues were reassigned, but acknowledged that that was beyond their role and were given additional (but brief and general) insight about the actions.
6. Ecology was told Tank Farms has shipped their last backlog drum.
7. Ecology noted the recent improvement in Tank Farm accumulation practices and the positive attitudes of people they talked to at Tank Farms.

## ISSUANCE OF BACKLOG PINs

### ISSUE PAPER

#### ISSUE:

Ecology does not have a clear understanding of how backlog PINs were issued. They are confused as to how WHC can state that "in only one case was PINs issued after the 12/31/92 deadline date as referenced in WHC-IP-0871", when PINs have been entered into SWITS after the above mentioned deadline.

#### BACKGROUND/DISCUSSION:

WHC-IP-0871, Rev. 1 states that, *"A questionnaire will be sent to all generating units requesting that they identify by November 13, 1992 the number of waste packages they believe are backlogged. A limited number of backlog Package Identification Numbers (PIN) will be sent to the generating unit based on the inventory. After November 13, 1992, a case-by-case review will determine when further backlog PIN numbers will be issued. No backlog PIN numbers will be issued after December 31, 1992."*

After a facility had identified how many PINs they required, the facility was tasked with completing a Backlog Waste Information Sheet (BWIS). When BART received the BWIS, they entered the next applicable PIN in the backlog PIN section on the form and entered the information in SWITS. The system was managed in this manner for the following reasons:

- Deadlines were stated to provide only a window of opportunity for generators to identify applicable backlog waste.
- Solid Waste Management retained control of the issuance of PINs so that the labelling was consistent and followed the prescribed format.
- BART placed the PINs on the BWIS and entered it in SWITS due to the fact that generators did not have access to SWITS at the time and to provide a centralized tracking for verification that the generator had not duplicated, skipped, or passed the number of allotted PINs.

PINs which had been issued were written on BWISs and entered into SWITS after the December 31, 1993 deadline, but only one set of seven were issued after the December 31 deadline (see Attachment 1). The 309 Facility had identified the unpackaged waste, prior to the November 13, 1992 deadline, but did not officially request PINs until after the December 31, 1992 deadline. Due to the fact that this waste was identified prior to all deadlines and the 309 facility was trying to estimate the number of containers and classifications of their waste during the time period between November 13 and December 31, BART recommended that Solid Waste Management issue 309 facility it's block of PINs.

## **ISSUANCE OF BACKLOG PINs**

### **ISSUE PAPER**

#### **RECOMMENDATION:**

BART recommends that this issue paper be distributed to all concerned parties so that a WHC has more consistent/accurate understanding of the backlog PIN issuance policy.

## ISSUANCE OF BACKLOG PINs ISSUE PAPER

### ATTACHMENT 1

GENERATOR	# BACKLOG PIN REQUESTED	DATE REQUESTED	# BWIS APPROVED BY 5/6/93	LEVEL II INITIALS	# BWIS SHIPPED 5/6/93
PUREX/UO3	74	11-12-92	26	JCM	25
ERO	204 45 1	11-10-92 11-13-92 11-13-92	82	MCH	61
B PLANT	1	11-17-92	1	DMB	1
TANK FARMS	2278	11-13-92	<sup>1</sup> 2298 <sup>2</sup>	MAP	2247
222-S LABS	165	11-12-92	19	MLB	0
FFTF/MASF/308	103 13	11-10-92 NOT DATED	79	JMS	78
FFP	633	NOT DATED	263 <sup>2</sup>	ECV	190
N REACTOR	11 1	11-13-92 12-21-92	12	HLD	12
300 AREA/377	12	11-12-92	4	RWP	4
309	7	1-6-93	4	EWG	4
SOLID WASTE MANAGEMENT	6	11-16-92	33	WHH	32
T PLANT	130	11-16-92			
PEDF (LAUNDRY)	28	10-27-92	28	BAH	0

<sup>1</sup> TANK FARMS WAS NOT AUTHORIZED TO EXCEED THEIR INITIAL NUMBER OF PINS UNTIL REVISION 2 WHC-IP-0871 WAS ISSUED ON 4/6/93.

<sup>2</sup> THIS NUMBER IS  $\pm 10$  DUE TO THE FACT THAT THE TRACKING SYSTEM HAS NOT BEEN UPDATED FOR BWISs WHICH WERE APPROVED ON 4/30/93.

[20] From: William H (Bill) Hamilton Jr at ~WHC212 5/10/93 10:34AM (22767 bytes:  
12 ln, 2 fl)

To: Vernon R Dronen at ~WHC85, Harry D Harmon at ~WHC140, Patrick J Mackey at  
~WHC52, Henry E Jr (Hank) McGuire at ~WHC219, Randal J Roberts at ~WHC180,  
Dan J Swaim at ~WHC200, Gerald W (Jerry) Faulk at ~WHC229, Paul L Hapke at  
~WHC228, June M Hennig at ~DOE15, Rudy F Guercia at ~DOE15,  
Clifford E (Cliff) Clark at ~DOE13

cc: Jean L Shearer

Subject: MINUTES OF MAY 4 MEETING WITH ECOLOGY

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

Text item 1:

Attached are the minutes to the May 4 meeting with Ecology.  
Also attached is the explanation referred to in item c.

If you have questions, please call my office on 6-4596.

W. H. Hamilton, Jr., Manager  
Solid Waste Disposal

jls

*file W-296*

RECEIVED  
MAY 10 1993  
V. R. DRONEN