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September 18, 1991

Meeting Minutes Transmittal/Approval
Tri-Party Agreement Meeting
Federal Building, Room 780
Richland, Washington
July 10, 1991

From/ Appvl.: Steven H. Wisness Date: 9/18/91
 Steven H. Wisness, TPA Manager, DOE (A5-19)

Appvl.: Paul T. Day Date: 9/18/91
 Paul T. Day, Representative, EPA (B5-01)

Appvl.: Tim L. Nord Date: 9/18/91
 Tim L. Nord, Representative, Washington Dept. of Ecology, Olympia, WA

The purpose of this meeting was to track progress toward Tri-Party Agreement milestones, evaluate the applicable budgets and determine what actions are needed to comply with TPA milestones.

Meeting Minutes are attached. Minutes are comprised of the following:

- Attachment #1 - Summary of Meeting and Commitments and Agreements
- Attachment #2 - Agenda for the Meeting
- Attachment #3 - Attendance List
- Attachment #4 - Commitments/Agreements Status List
- Attachment #5 - Quarterly Briefing, Past Practices Activities
- Attachment #6 - Status of Milestone M-17-00, Liquid Effluent Treatment and Disposal
- Attachment #7 - M-26-00, Annual Hanford LDR Report

Prepared by: Doug Fossett Date: 9/20/91
 SWEC GSSC



Tri-Party Agreement Meeting
July 10, 1991

Distribution:

W.W. Bixby, DOE (A7-30)
R.J. Bliss, WHC (B3-04)
E.A. Bracken, DOE (A5-19)
K.W. Bracken, DOE (A5-22)
Frank Calapristi, WHC (B2-35)
Paul Day, EPA, (B5-01)
J.K. Erickson, DOE (A5-19)
D.P. Fassett, SWEC (A4-35)
C.J. Geier, WHC (B2-19)
Marie Harris, WHC (B3-35)
Ronald D. Izatt (A5-22)
D.E. Kelley, WHC (R1-48)
L.E. Little, DOE (A5-22)
A.E. Lorenz, DOE (A7-89)
H.E. McGuire, WHC (B2-35)
Ken Morgan, DOE (A7-75)
Tim Nord, Ecology, Lacey, Washington
Don Praast, GAO (A1-80)
Jim Rasmussen, DOE (A5-22)
J.O. Skolrud, WHC (B2-20)
T.B. Veneziano, WHC (B2-35)
S.H. Wisness, DOE (A5-22)
R.D. Wojtasek, WHC (L4-92)

EDMC, Care of Susan Wray, WHC (H4-22)

Please inform Doug Fassett (SWEC) of deletions or additions to the distribution list.

Attachment #1

Summary of Meeting and Commitments and Agreements

Tri-Party Agreement Meeting
July 10, 1991Opening Remarks

Steve Wisness (DOE) opened the meeting by stating that issues which senior management needs to be involved in will be identified on a quarterly basis. Mr. Wisness said senior management (Dana Rasmussen (EPA), Christine Gregoire (Ecology) and John Wagoner (DOE)) would meet on a quarterly basis.

Action Item TPA.10: Set up a date for a meeting on the TPA management system to ensure EPA's and Ecology's concerns are included. Action: Lee Olson (MACTEC)

Past Practices Activities - M-12-00, M-13-00, M-15-00, M-16-00, M-27-00, M-28-00, M-29-00, M-30-00

Julie Erickson (DOE) gave a presentation on TPA Past Practice Activities and covered eight TPA Milestones (see Attachment #5). Julie Erickson stated that the work plans that had already been produced would be used to the maximum extent possible during the rescoping of work plans.

In accordance with M-27-00 (Submittal of 200 Area AAMS Reports), the first AAMS (Aggregate Area Management Study) report to be submitted will be for U-Plant. This report will be submitted in January 1992.

Interim milestone M-28-03, was for the soil background report to be submitted to EPA and Ecology in February 1992. DOE believes it should be submitted in July 1992 based on the detailed schedule.

Action Item TPA.11: Steve Wisness (DOE) will Look at the schedule and recovery plan for M-28-03 and provide information to the regulators. The postponement of M-28-03 is to be evaluated in a meeting the week of July 15. Action: Julie Erickson (DOE).

The M-15-00 (RI/FS Process Completion) interim milestones for the four approved work plans are planned to be discussed at the July Unit Managers Meetings.

Julie Erickson gave the presentation entitled Completion of Remedial Actions related to M-16-00. She stated that the dispute on 1100-EM-1 has delayed some work, however field work will continue. The dispute is on combining reports, the delayed schedule and on the basis for the risk assessment (i.e. residential/agricultural or industrial). The

requirement for involvement of Advanced Nuclear Fuels (ANF) has also contributed to the delay.

The accomplishments during the last three months were described. Ron Lerch (WHC) said due to the requirements for public notification of activities in the "Wild & Scenic River" portion of the Columbia River, more time is required to take action.

Paul Day (EPA) said that as long as safety activities, *recently imposed by DOE/WHC*, did not *compete with Environmental Restoration Division (ER) funds or delay milestones*, he would not be concerned.

Action Item TPA.12: List the notifications that are required for action at the "Wild and Scenic River" portion of the Columbia and provide the information to Ecology by July 24, 1991. Action: *Roger Freeberg (DOE)*.

Action Item TPA.13: Set up a meeting in August between DOE, EPA and Ecology to discuss safety activities. Action: *Roger Freeberg (DOE)*.

Tom Wintczak said that approval for intrusive acts at rescoped operable units would be obtained from the regulators in Unit Manager Meetings or by letter correspondence with the regulators.

Willis Bixby said the 300-FF-1 & 5 operable units were delayed due to a lack of timely receipt of congressionally authorized funding and to the wet-lands assessment. A change request is planned to be submitted to the regulators by the end of July. *Paul Day made the comment that RL made the unilateral decision on how to distribute the FY 1991 ER budget.*

Discussion

Future land use was discussed. Julie Erickson said the Programmatic Environmental Impact Statement (PEIS), to be completed by DOE/HQ, may influence the Hanford Remedial Action - Environmental Impact Statement (HRA-EIS) by DOE/RL. She said the HRA-EIS may be used to resolve the land use issue.

Regarding the future allocation of funding, Julie Erickson said that the five year plan needs to be updated to allow for earlier remediation.

A RCRA/CERCLA integration task team is to determine the governing guidelines for Treatment Storage and Disposal (TSD) facilities in past practice operable units. The initial meeting will be on July 12.

Action Item TPA.14: The names of the EPA-HQ and DOE-HQ personnel who are involved in NEPA issues and EPA-HQ guidance that has been provided to DOE-HQ are to be provided to Paul Day and Tim Nord by July 19. Action: *Julie Erickson (DOE)*.

Laboratory Capacity

Tim Nord (Ecology) expressed concern about laboratory capacity and whether shipping samples off site would allow meeting the turn around requirements in the TPA. *He said the approach of using offsite labs would probably not meet the TPA requirements.* Steve Wisness said a change request will be submitted to meet the milestones for laboratory capacity. *Paul Day commented that a change request on this issue was not likely to be approved, given the unilateral decision by DOE to halt design work last fall and due to the poor current record for contract lab turn around times.*

Complete Facilities and Upgrades - M-17-00

Don Kelley (WHC) said operation of the C-018 effluent treatment facility is planned to begin in January 1994. It is planned that the Research Design and Development (RD & D) permit will be submitted to the regulators in August 1991.

The value engineering report for the C-018 facility is due on July 16.

The rough drafts of the sampling and analysis plans for the Plutonium Finishing Plant (PFP) and the Uranium Oxide (UO₃) Plant will be discussed with EPA & Ecology *the week of July 22, 1991.*

The liquid effluent program plan is expected to be submitted to DOE in July, and to the regulators in August.

Due to unresolved monitoring requirements with Ecology, negotiating a 216 permit schedule by September 1991 is unlikely.

The RD & D permit application is planned to be submitted to EPA in August 1991. *Paul Day commented that EPA must have a complete permit application before it can begin the process of permit issuance. He noted that an August 1991 application will not result in a final permit by January or February 1992, the date identified by DOE/WHC to keep M-17-00 on schedule. EPA estimates that it will take until at least May 1992 to issue this permit. Therefore, EPA will not be held accountable for any impact to M-17-00.*

Action Item TPA.15: A meeting will be arranged by July 12 to discuss the regulators view of the deliverables that are required to meet the September 1991 milestones. Action: Tim Nord (Ecology).

Action Item TPA.16: Develop a "Level 0" chart to show the schedule and the critical path items required to meet M-17-00. This will be done in the next two weeks and provided to Tim Nord and Paul Day. Action: Teresa Hennig (DOE).

Annual LDR Report/LERF - M-26-00

Jerry Skolrud (WHC) said the annual report will cover activities for the past year, and actions needed to comply with milestone M-26-00. DOE waste streams will be grouped by treatability on a nationwide basis. Potential treatment technologies will also be identified for each group. *Paul Day commented that EPA was delinquent in providing comments on the first Annual Report and that DOE should proceed with issuance of the second Annual Report without EPA's comments.*

General Discussion

Regarding the site-wide RCRA permit, Tim Nord said there is no holdup on HWVP (Hanford Waste Vitrification Plant) by Ecology. If there is a hold up it will be on C2. If a decision is not made in January, the April deadline for permit issuance can not be met. Carol Geier (WHC) noted that the SEPA process requires that the proposal to construct and operate HWVP must be presented to the public.

Action Item TPA.17: A letter is to be written to Ecology and EPA identifying what will be included in the site-wide RCRA permit. Action: Carol Geier (WHC).

Future Meetings

Paul Day asked that a summary of the up coming presentations for the TPA meeting be provided to involved organization representatives before each TPA meeting takes place.

Attachment #3

Attendance List

Tri-Party Agreement Meeting
July 10, 1991

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Fassett, Doug	SWEC	(509) 376-5011
Bixby, Willis	DOE	(509) 376-0024
Bracken, Kenneth	DOE	(509) 376-1366
Bracken, Liz	DOE	(509) 376-7277
Clark, Suzanne	DOE	(509) 376-9055
Erickson, Julie	DOE	(509) 376-3603
Freeberg, Roger	DOE	(509) 376-7167
Guercia, R.F.	DOE	(509) 376-5494
Hennig, Teresa	DOE	(509) 376-6888
Holt, Bob	DOE	(509) 376-9989
Huffman, Lori	DOE	(509) 376-0104
Little, Leo	DOE	(509) 376-6228
Rasmussen, Jim	DOE	(509) 376-2247
Wisness, Steve	DOE	(509) 376-6798
Nord, Tim L.	Ecology	(206) 438-7021
Day, Paul	EPA	(509) 376-6623
Olson, Lee	MACTEC	(509) 946-0176
Baumann, Marcie	WHC	(509) 376-9740
Black, Dale	WHC	(509) 376-8458
Calapristi, Frank	WHC/TPA I	(509) 376-6693
Geier, C.J.	WHC	(509) 376-2237
Kelley, Don	WHC	(509) 373-4745
Lerch, Ron	WHC	(509) 376-6628
Parnell, KaeRae	WHC	(509) 376-4060
Skolrud, Jerry D.	WHC	(509) 376-6180
Veneziano, Tim	WHC	(509) 376-0543
Wintczak, Tom	WHC	(509) 376-0902
Wojtasek, Rick	WHC	(509) 376-7000

Attachment #4

Action Items

Tri-Party Agreement Meeting
July 10, 1991

Item No.	Action/Source of Action	Status
<u>June Action Items</u>		
TPA.1	A working group is to be arranged to conduct meetings on report formats. Ecology and EPA will notify DOE of an appropriate time to hold this meeting. Action: T. Nord (Ecology) and P. Day (EPA) (6/13/91)	<i>Closed</i> <i>A meeting was held on July 23. It included Roger Stanley (Ecology), Gene Higgins (DOE), and Lee Olson (MACTEC) (7/30/91).</i>
TPA.2	The WHC scope for the Waste Sampling and Characterization Facility (WSCF), the independent scope that was two million dollars less and the letter(s) from DOE to WHC that say the scope should be reevaluated are to be provided to Ecology. Action: Donna Wanek (DOE) (6/13/91)	Open
TPA.3	WHC is to research the WHC TPA files and provide a copy of all information related to the potential delay of Milestone M-14 to Steve Wisness (DOE). The timeframe of interest is October 1990, to January 1991. Action: T. Veneziano (WHC) (6/13/91)	Open
TPA.4	An additional meeting is to be held to discuss laboratory support for WRAP I. Action: Steve Wisness (DOE) (6/13/91)	Open
TPA.5	WRAP design and construction information is to be provided to Ecology as soon as it becomes available so Ecology will have it before the meeting on June 28. Action: Steve Wisness (6/13/91)	<i>Closed (7/30/91)</i>
TPA.6	Information on funding of groundwater wells through FY 1992 is to be provided to Ecology (T. Nord) within two weeks. Action: R.R. Thompson (WHC) (6/13/91)	Open

- TPA.7 A meeting is to be held on Tuesday, June 18 in Spokane, WA to discuss the Ecology draft response to the DOE letter that was sent on August 1990. Action: Steve Wisness (6/13/91) Open
- TPA.8 A meeting is to be held to identify issues that need to be elevated to the project manager level. Action: Steve Wisness (6/13/91) *Closed*
Issues related to the permit have been identified (7/30/91).
- TPA.9 DOE is to submit the paperwork for interim status corrective actions and Ecology is to *more fully explain what types of systems receive "treatment by generator" approvals.* Action: Steve Wisness and Tim Nord (6/13/91) Open
- July Action Items
- TPA.10 Set up a date for the briefing on the TPA management system. Ecology's concerns are to be included. Action: Lee Olson (MACTEC) (7/10/91) *Closed*
A meeting was held on July 23. It included Roger Stanley (Ecology), Gene Higgins (DOE), and Lee Olson (MACTEC) (7/30/91).
- TPA.11 Steve Wisness (DOE) will look at the schedule and recovery plan for M-28-03 and provide information to the regulators. The postponement of M-28-03 is to be evaluated in a meeting the week of July 15. Action: Julie Erickson (DOE) (7/10/91) Open
- TPA.12 List the notifications that are required for action at the "Wild and Scenic River" portion of the Columbia and provide the information to Ecology by July 24, 1991. Action: Ron Lerch (DOE) (7/10/91) Open
- TPA.13 Set up a meeting in August between DOE and Ecology to discuss safety activities. Action: Roger Freeberg (DOE) (7/10/91) Open

- TPA.14 The names of the EPA/HQ and DOE-HQ personnel who are involved in NEPA issues and EPA guidance that has been provided to DOE-HQ are to be provided to Paul Day *and Tim Nord* by July 19. Action: Julie Erickson (DOE) (7/10/91) Open
- TPA.15 A meeting will be arranged by July 12 to discuss the regulators view of the deliverables that are required to meet the September 1991 milestones. Action: Tim Nord (Ecology) (7/10/91) *Closed Meetings have taken place (7/39/91).*
- TPA.16 Develop a "Level 0" chart to show the schedule and the critical path items required to meet M-17-00. This will be done in the next two weeks *and provided to Tim Nord and Paul Day*. Action: Teresa Hennig (DOE) Open
- TPA.17 A letter is to be written to Ecology and EPA identifying what will be included in the site-wide Part B permit. Action: Carol Geier (WHC) (7/10/91) Open
The letter has been drafted and sent to DOE (8/16/91).

Quarterly Briefing
Past Practices Activities

Julie K. Erickson

July 10, 1991

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TPA Milestone M-12-00 requires 20 RI/FS or RFI/CMS work plans be submitted to EPA and Ecology by April 1992

- TPA change request revises number of work plans from 20 to 15 with a completion date of June 1992
- First 14 work plans have been submitted to EPA and Ecology
- Ten of the work plans are being revised in accordance with the Past Practices Strategy and will be resubmitted to EPA and Ecology from September 1991 through December 1991

**TPA Milestone M-13-00 requires 6 RI/FS
or RFI/CMS work plans be submitted each year to
EPA and Ecology starting in CY 1992**

- TPA change request defers start of M-13-00 to CY 1993

TPA milestone M-27-00 requires that all Aggregate Area Management Study Reports for the 200 Areas be submitted to EPA and Ecology by September 1992

- **A methodology and format for the AAMS reports was submitted to EPA and Ecology at the end of June 1991 (M-27-01)**
- **There will be 10 AAMS reports for the 200 Areas**
- **The AAMS reports are due starting January 1992 and submittals will be completed by September 1992 (M-27-02 thru M-27-11)**

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TPA milestone M-28-00 requires documentation of soils and groundwater backgrounds be submitted to EPA and Ecology by April 1992

- **Soils and groundwater background sampling and analysis plan was submitted in June 1991 (M-28-01)**
- **The background methodology description document is due to EPA and Ecology in July 1991 (M-28-02)**
- **Soils background report is to be submitted to EPA and Ecology in February 1992 (M-28-03) Based on detailed schedule this date should be July 1992**
- **Groundwater background report is to be submitted to EPA and Ecology in April 1992 (M-28-04)**

TPA milestone M-29-00 requires that documentation describing the Hanford Risk Assessment Methodology be submitted to EPA and Ecology by March 1992

- Risk assessment team has been formed and schedule developed for remainder of fiscal year
- Objective is to develop a risk assessment methodology for past practices activities at Hanford by March 1992

TPA milestone M-30-00 requires the integrated general studies of the 100 Areas be completed by September 1993

- **Complete all non-intrusive field activities in the 100 Areas by September 1992 (M-30-03)**
- **Study contaminated springs impacts on the Columbia River and develop plan to determine cumulative impacts by May 1992 (M-30-01 & M-30-02)**
- **Initiate monitoring of unconfined aquifer evaluating its interaction with the Columbia River by September 1993 (M-30-04 & M-30-05)**

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TPA Milestone M-15-00 requires RI/FSs for all operable units to be completed by September 2005

- **TPA change request does not impact current M-15-00 interim milestones**
- **EPA and Ecology request for designation of new interim milestones for approved work plans by June 1991 remains open**
- **Four operable unit RI/FSs have been initiated**
- **300-FF-1 and 300-FF-5 are behind schedule**
- **Change request is being prepared for 300-FF-1 and 300-FF-5 (I)**

TPA Milestone M-16-00 requires remedial actions for all operable units to be completed by September 2018

- **TPA change request did not impact M-16-00**

Significant RI/FS activities were accomplished during the past three months

- **1100-EM-1 is finalizing the FS 1 & 2 Report and Supplemental Work Plan**
- **RI 2 groundwater wells have been installed around the Horn Rapids Landfill**
- **Groundwater well drilling has been initiated in 300-FF-5**
- **200-BP-1 has completed one vadose zone hole through a crib**
- **Numerous non-intrusive activities are being performed in 100, 300, and 1100 Areas**

Characterization activities will increase during the next six months

- **Drilling activities will continue in 200-BP-1, 300-FF-5 and 1100-EM-1**
- **Drilling will be initiated in 300-FF-1 in July 1991**
- **Drilling will be initiated in the 100 Areas in early FY 1992**
- **Trenching will be performed in 1100-EM-1**
- **Non-intrusive activities will continue in the 100 and 300 Areas**

Past Practices Activities

Issues

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Issue

The change request for 300-FF-1 and 300-FF-5 will provide recommendations for the acceleration of the Records of Decision and reductions in cost of the RI/FS

- **Revise scope of characterization in accordance with Past Practices Strategy**
- **The schedule delays due to allocation of funding and impacts due to Wetlands Assessment will also be addressed**

Issue

The 100 Area work plans have been rescoped to significantly reduce the amount of characterization data required prior to making a cleanup decision

- **The acceleration of characterization should allow most of the 100 Areas RI/FS activities to be completed by FY 1995 resulting in several major issues**
 - **Waste disposal**
 - **Funding**
 - **Land use**
 - **RCRA/CERCLA integration**
 - **NEPA/SEPA**
- **Actual schedule for characterization will be constrained by available resources**

Issue - Waste Disposal

A disposal/storage plan for the large volumes of waste that will likely be generated in the cleanup of the 100 Area, needs to be continued from the Macroengineering Studies

CORRECTIVE ACTION

- **Prioritize FY 1992 activities to include waste storage/disposal study**

Issue - Funding

Remediation funding will be required several years earlier than currently planned resulting in significant increases in budget requirements

CORRECTIVE ACTION

- **Update Five Year Plan to reflect early initiation of remedial activities in the 100 and 300 Areas**
- **Prioritize activities between characterization and cleanup to maintain a balance with a bias for action**

Issue - Land Use

The land use strategy may not be in place to support the 100 Area cleanup. Therefore, source cleanup will likely default to residential/agricultural

CORRECTIVE ACTION

- Clean up levels will be established on a case by case basis until land use is determined**

Issue - RCRA/CERCLA Integration

RCRA/CERCLA integration needs to be clearly defined to avoid duplication and/or unnecessary activities

CORRECTIVE ACTION

- **Task team has been formed to address this issue**
- **Task resolution is required by July 31, 1991, in order to revise work plans**

Issue - NEPA/SEPA

Disconnect exists between DOE and EPA on requirements for NEPA. The NEPA/SEPA documentation required for remediation needs to be defined and initiated

CORRECTIVE ACTION

- **Form NEPA/SEPA task team to define documentation requirements by end of FY 1991**

Issue

Currently several areas of resources are constraining the characterization activities

- **The inability to receive timely laboratory analyses are impacting the characterization activities.**
- **The demand for drilling equipment and field support personnel will continue to exceed the supply through next fiscal year**

CORRECTIVE ACTION

- **Continue procurement process for obtaining sufficient laboratory services to support needs. Considering penalty clauses in contracts. Holding meetings with contract laboratories to emphasize importance of activities**
- **Implement value engineering recommendations for drilling**
- **Evaluate and select alternatives for obtaining additional support services**

**Status of Milestone M-17-00
Liquid Effluent Treatment and Disposal**

D.E. Kelley

**Tri-Party Agreement Major Milestone
Management Review**

July 10, 1991

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Liquid Effluent Treatment and Disposal

Major Milestone M-17-00 Addresses High Priority Effluent Streams

- **M-17-00 "Complete Liquid Effluent Treatment Facilities/Upgrades for all Phase I Streams"**
 - Nineteen Streams discharged to soil column
 - Some RCRA Regulated Units receive streams (such as "B" Pond)
 - Action Date for Treatment/Elimination is June 1995

- **Does not address fourteen Phase II Streams or Other "Miscellaneous" Streams**

- **Encompasses Several Major Activities/Projects**
 - Project W-105 Liquid Effluent Retention Facility
 - Project C-018H 200 Area Effluent Treatment Facility
 - Project W-049H (M-17-08) 200 Area TEDS
 - Project L-045H (M-17-06) 300 Area Effluent Treatment Facility
 - HEC Line Item
 - GPP's, Expense Activities

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Liquid Effluent Treatment and Disposal

Milestone M-17-00 is currently on schedule for completion by June 30, 1995

- The following accomplishments have occurred in the last 3 months:
 - Approval to prepare State Waste Discharge Permit Applications was obtained from the Secretary of Energy
 - LERF (Project W-105) construction is proceeding
 - 6000 ft of Effluent Transfer Pipe installed and tested
 - Earthwork for 3 basins completed
 - Soil/bentonite mix for 2 basins stockpiled
 - Geotextile and soil/bentonite installation underway on the first basin
 - LERF Permitting/Safety Activities Continue
 - Part B Permit Application certified and sent to regulators
 - Draft State Dangerous Waste Plans Submitted to regulators
 - FSAR sent to DOE-RL for comment

Liquid Effluent Treatment and Disposal

- **Project C-018H Implementation Continues**
 - **Part A Permit was submitted to regulators**
 - **Procurement Specification issued**
 - **Bid Process underway, Technical Qualification Phase**
 - **Pilot Plant equipment procured**
 - **216 Permitting Plan has been completed**
 - **Air Permitting strategy developed with regulators**
 - **Draft 240 Engineering Report drafted and submitted to regulators**

Liquid Effluent Treatment and Disposal

Milestone M-17-00 is currently on schedule for completion by June 30, 1995

- The following activities are planned in the next 6 months:
 - Project C-018H
 - Bidders will be "short-listed" based on technical qualifications and a contract will be issued in December
 - Disposal Alternatives Engineering Study will be completed
 - Site Characterization Work Plan will be approved by regulators
 - Continue Pilot Plant installation (A Research Demonstration and Development Permit is required by Jan 1992)
 - Permitting activities will continue
 - LERF (Project W-105) will be completed
 - Basin Liners (Total composite) placed
 - Piping complete
 - Cover placement complete
 - NOD's on Part B expected
 - Support facility construction will be complete
 - Readiness Review will be complete

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Liquid Effluent Treatment and Disposal

Milestone M-17-02 needs to be rebaselined or eliminated

- M-17-02 "Complete PUREX Ammonia Scrubber Distillate Treatment System"
- PUREX Ammonia Scrubber Distillate, Process Distillate Discharges have been discontinued. If streams are required in the future will negotiate to feed into Effluent Treatment Facility
- Will be addressed in September, 1991 when milestones are negotiated for all 33 streams

Liquid Effluent Treatment and Disposal

Milestone M-17-04 is currently on schedule

- M-17-04 "Complete B Plant Chemical Sewer Upgrades" by 7/31/92
- The following accomplishments have occurred in the last 3 months:
 - Soils Survey Plan developed and implemented
 - Construction initiated (Project W-004)
- The following activities are planned in the next 6 months
 - Construction will continue

Liquid Effluent Treatment and Disposal

Milestone M-17-06 will not be completed on scheduled date

- M-17-06 "Cease all discharges to 300 Area Process Trenches"
- TPA schedule shows a December, 1991 completion
- Project schedule does not support TPA date
 - Project will be completed in December, 1994
 - Change Request submitted in March, 1990. Decision was deferred by the regulators until September 1991
- Recent negotiations conducted to attempt to resolve issue
 - Series of actions agreed upon to support change request
 - Change request approval/denial to occur in September, contingent on outcome of actions

Liquid Effluent Treatment and Disposal

Milestone M-17-06 will not be complete on scheduled date...Continuation

- The following accomplishments have occurred in the last 3 months:
 - Renegotiated issue with regulators, developed action plan for resolution
 - Initiated expedited response action (cleanup of 316-5 Process Trench)
 - Conducted Value Engineering exercise on project improvement with regulators
 - Achieved significant reductions in volume to trench via administrative and physical controls (1300 gpm to 700 gpm)

- The following activities are planned in the next six months
 - Value Engineering Report is due 7/16/91
 - Implement selected VE recommendations
 - Complete expedited response actions and assess impacts
 - Achieve further volumetric reductions to goal of 400 gpm by 12/91
 - Complete procurement specification
 - Completion of Wastewater Sampling and Analysis Plan and QA documentation

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Liquid Effluent Treatment and Disposal

Milestone M-17-08 is currently on schedule for completion by June 30, 1995

- **M-17-08 "Complete 200 Area Treated Effluent System"**
 - Will address 200 Area Phase I's and 200 West Area Phase II's
 - Project W-049H

- **The following accomplishments have occurred in the last 3 months:**
 - Draft Function Design Criteria, Rev. 1 completed and in review
 - Draft Disposal Site Evaluation/Selection Technical Program Plan completed and provided to regulators
 - Integrated Program Schedule developed

- **The following activities are planned in the next 6 months:**
 - Site Evaluation/Selection Technical Program Plan will be finalized
 - FDC, Rev. 1 will be approved by DOE-RL
 - Air emissions estimate will be completed (Permitting basis)
 - Complete Program Management Plan for the 240 Engineering Report

Liquid Effluent Treatment and Disposal

Milestone M-17-08 is currently on schedule for completion by June 30, 1995... Continued

The following activities are planned in the next 6 months (continued):

- Initiate the 240 Engineering Report
- The Operations and Maintenance manuals will be submitted for regulator review
- The Disposal Site Evaluation Report will be submitted to the regulators for review
- The Disposal Site Characterization Work Plan will be prepared
- The revised Conceptual Design Report will be completed by WHC
- The Soil Investigation Categorical Exclusion will be approved

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Liquid Effluent Treatment and Disposal

Milestone M-17-09 is currently on schedule for completion by June 30, 1995

- M-17-09 "Complete 300 Area Treated Effluent System"
- The following accomplishments have occurred in the last 3 months:
 - Meetings have been conducted with regulators to define the NPDES permitting process
 - River samples were obtained to support NPDES Permitting
 - An Engineering Report (BAT/240 Report equivalent) has been drafted
 - Bench testing initiated to support technology selection
- The following accomplishments are planned in the next 6 months:
 - Complete the Engineering Report and submit to regulators
 - Submit Sampling and Analysis Plan to regulators
 - Initiate Effluent and River Sampling Activities
 - Complete Procurement Specification

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Liquid Effluent Treatment and Disposal

Milestone M-17-10 is currently on schedule for completion by June 30, 1995

- M-17-10 "Cease all Liquid Discharges to Hazardous Land Disposal Units unless such units have been clean closed in accordance with RCRA"
 - Projects W-049H and L-045H are required to meet this milestone. Progress was identical on Milestone M-17-06 and M-17-08

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Liquid Effluent Treatment and Disposal

Proposed TPA Milestone additions are out for public comment

- M-17-11** **Comply with Interim Operating Restrictions for Regulator "Priority" Effluents**

- M-17-12** **Submit Sampling and Analysis Plans for all 33 Effluents to Regulators**

- M-17-13** **Submit Methodology for Assessing Impact of Liquid Discharge on Groundwater at Disposal Sites to EPA and Ecology for approval**

Liquid Effluent Treatment and Disposal

Interim Operating Restrictions must be complied with until Final Stream Disposition

- **Milestone M-17-11**
- **Twelve Streams identified, affecting six facilities**
 - **N Reactor** - **PUREX Plant**
 - **PFP** - **B Plant**
 - **UO3/U Plant** - **AY/AZ Tank Farm**
- **Flow Limitations Identified**
- **Special Studies required for some streams**
 - **Accelerated Treatment**
 - **Inventory Estimates**
 - **Rerouting**
 - **Facility Modifications**
- **Program Management Plan is being prepared to identify cost and schedule**

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Liquid Effluent Treatment and Disposal

- Milestone M-17-11 (continued)

Target milestones due in next six months:

- Complete study evaluating need for post neutralization filtration for removal of uranium from UO_3 Plant Process Condensate by 8/31/91 - On Schedule
- Provide current inventory estimate on transuranic in 216-2-20 Crib (PFP) by 7/31/91 - On Schedule
- Complete study to evaluate the need for accelerating treatment of transuranics by 7/31/91 - On Schedule
- Install Fibermister Eliminator * UO_3 by 12/31/91 - On Schedule

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Liquid Effluent Treatment and Disposal

Sampling and Analysis Plans must be submitted for all 33 Streams

- **Milestone M-17-12**
- **Phased submittals, based on "Priority"**
 - **Seven SAP's due at startup or September, 1991**
 - **Six SAP's due Jan 1992**
 - **Ten SAP's due Apr 1992 (Phase II's)**
 - **Remaining Streams only need SAP's if decision made to resume discharge**
- **PFP and UO3/U Plant SAP's serving as "Prototypes"**
- **Requirements/Content being negotiated with regulators**

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Liquid Effluent Treatment and Disposal

Site Impact Assessment Methodology Must be Developed in Concert with Regulators

- **Milestone M-17-13**
- **Purpose is to agree on a methodology for assessing:**
 - **Continued discharges**
 - **Priorities of Stream Treatment Projects**
 - **Resumed or new discharges**
- **Proposed methodology to be submitted to regulators by October, 1991**
schedule for the preparation of the methodology will be included in the Program Plan
- **Current status**
 - **Contract has been issued to IT for preparation of methodology**

Liquid Effluent Treatment and Disposal

Additional Liquid Effluent Discharge Milestones will be negotiated by September, 1991

- **Will include interim and final milestones addressing aspect of 33 streams:**
 - **Waste reduction/minimization activities**
 - **Interim and final treatment**
 - **Termination of discharges**

- **Program Management Plan to support Treatment/Disposal Project Descriptions**
 - **Includes site Effluent Treatment/Disposal Project descriptions**
 - **Facility/Stream Activities**
 - **Action Plans and schedules**
 - **BAT Evaluations/240 Reports (will be scheduled within the plan)**

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Liquid Effluent Treatment and Disposal

State Waste Discharge Permits will be obtained for Long-Term Discharges

- **Watkins's letter authorizes application for permits**
 - **WAC Chapter 173-216**
 - **RCW 90.48.160**

- **Administration of these provisions of State Law is outside of the TPA**

- **Agreement to be negotiated by September, 1991 or such later date as parties agree upon**
 - **Schedule for obtaining permits**
 - **Include necessary actions leading to obtaining such permits pursuant to State Law**

- Liquid Effluent Treatment and Disposal

Milestone M-17-00 Issues

- **Require the approval of a Research Demonstration and Development Permit by January 1992 to support the design of the 200 Area Effluent Treatment Facility.**
- **Require timely review and comment resolution of the prototype sampling and analysis plans in order to meet the September 1991 milestone.**
- **Requirements for a 216 Permit still need to be resolved with Ecology, so negotiating a 216 Permit schedule by 9/91 is unlikely.**

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M-26-00

**ANNUAL HANFORD
LDR REPORT**

J. O. Skolrud

July 10, 1991

9513338.0380

M-26-01 Submit an Annual Hanford Land Disposal Restrictions
October 31, 1991 Report in accordance with the LDR Plan to cover the
period from October 1 through September 30.

The following 1991 LDR Report accomplishments have occurred in the last three months

- Report activities schedule was developed to support October 31, 1991, submittal date
- Work initiated on selected report section drafts

The following activity is planned in the next six months

- Final LDR Report approved and transmitted by October 31, 1991

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1800-999156

Annual LDR Report will facilitate continuity with 1990 LDR Plan

- **Report scope, content, and format will be similar to DOE/RL-90-41 (1990 LDR Plan)**
- **Some re-alignment of LDR waste stream identification may occur for compatibility with DOE-Headquarters initiative to establish LDR waste treatability groupings. Completion may occur after issuance of 1991 Report; however, LDR waste treatability groupings will ultimately be incorporated into annual report updates**
- **1991 report will include approved milestone schedules subject to change control process**
- **Consideration is being given to combining M-26-01 with M-25-00, Alternatives to Land Disposal of Solid Radioactive Mixed Wastes on the Hanford Site.**

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M-26-02
October 31, 1991

Establish interim milestones for LDR compliance

- **Updated schedules are included in LDR Report Update, M-26-01**

M-26-03
December 1994

Cease discharge of 242-A Evaporator process condensate effluent to LERF units.

- On schedule

M-26-04
June 1995

Remove all hazardous waste residues from the 242-A Evaporator LERF units.

- On schedule

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