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Meeting Minutes Transmittal

222-S LABORATORY COMPLEX  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington

September 29, 1993  
1:00 p.m. - 2:00 p.m.

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

Not Present \_\_\_\_\_ Date: \_\_\_\_\_  
Clifford E. Clark, Unit Manager, RL

Daniel L. Duncan Date: 2/14/94  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

\_\_\_\_\_ Date: \_\_\_\_\_  
Gary Anderson, Unit Manager, Washington State Department of Ecology

222-S Laboratory Complex, WHC Concurrence

Mike J. Hall Date: 3-1-94  
Mike J. Hall, Contractor Representative, WHC

Purpose: Discuss Permitting Process

- Meeting Minutes are attached. The minutes are comprised of the following:
- Attachment 1 - Agenda
  - Attachment 2 - Summary of Discussion and Commitments/Agreements
  - Attachment 3 - Attendance List
  - Attachment 4 - Action Items
  - Attachment 5 - Ecology Letter to DOE-RL Dated September 9, 1993, Regarding Conceptual Design Report for Project W-178, Milestone M-32
  - Attachment 6 - 222-S Laboratory Complex, Status of Project Upgrades
  - Attachment 7 - Ecology Letter to DOE-RL Dated July 21, 1993, Regarding Request for Extension of Time, 222-S Laboratory Permit

2901-0226-116



Attachment 1

222-S LABORATORY COMPLEX  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington

September 29, 1993  
1:00 p.m. - 2:00 p.m.

- AGENDA -

1. PREVIOUS MEETING MINUTES
2. PROGRAM STATUS
  - Status of project upgrades
3. RCRA TOPICS
4. GENERAL TOPICS
  - Action items
    - Past action items
    - New action items
  - Schedule of next meeting
    - Tentative dates - (January?)
    - Proposed topics

A video conference will be established with the EPA (Mr. Dan Duncan) video conference room, Seattle, Washington and with Ecology (Mr. Gary Anderson) video conference room, Lacey, Washington.

94722.063

## Attachment 2

**222-S LABORATORY COMPLEX  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington**

**September 29, 1993  
1:00 p.m. - 2:00 p.m.**

### Summary of Discussion and Commitments/Agreements

#### 1. PREVIOUS MEETING MINUTES

- The minutes for the April, May and June 1993 Unit Managers Meeting are circulating for review and comment. There were no Unit Manager Meetings held in July and August 1993.

#### 2. PROGRAM STATUS

- Mr. S. Brey (WHC) provided a status on project upgrades for the 222-S Laboratory Complex (Attachment 6).

#### 3. RCRA TOPICS

- Mr. J. F. Williams Jr (WHC) initiated a discussion regarding the September 9, 1993 letter from Gary Anderson (Ecology) to James Bauer (RL) on the conceptual design report for Project W-178, Milestone M-32 (Attachment 5). Mr. Anderson questioned the rationale for the change in the conceptual design report. Mr. J. Beyer (WHC) explained that the initial engineering study was used as a vehicle to develop the conceptual design report for the project. Mr. Anderson noted the change in the conceptual design report from double-shell tank containment to a tank and liner system, and expressed concern for workers entering the facility to clean up in the event of a spill. Mr. Beyer explained that the level of radiation is extremely low, and routine maintenance and operation entries are made into the facility. Mr. Beyer then referred to the change from steam pumps to air pumps, and Mr. Anderson stated that use of air pumps is acceptable since entry into the facility is not limited. Mr. Anderson requested that the information regarding entry into the facility be clarified through correspondence or included in the conceptual design report. Mr. Beyer also noted that a portion of the floor in the cell will be cut out to accommodate the sump, and it has been verified the concrete is thick enough to support this procedure. Mr. Anderson indicated the procedure was acceptable.

WHC will draft a letter in response to Ecology's September 9, 1993 letter, and incorporate the agreements from the above-held discussion. A draft of the letter will be transmitted to Ecology and EPA for comment before a final letter is sent.

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- 90472756
- Mr. Williams referred to Ecology's letter dated July 21, 1993 (Attachment 7), which grants a 180-day extension for the submittal of Revision 1 of the permit application. Mr. Williams suggested that submission of Rev 1 be further deferred since there are very few changes to be incorporated into Rev 1. Mr. Anderson noted Ecology's position that work progress at Hanford is too slow, and that he did not want to be in a position of rewarding failure to meet a deadline by granting any request for extension of submitting documents. Mr. Williams responded that WHC was able to meet the deadline, and reiterated the purpose of requesting a further extension was due to the minimal changes to be incorporated in the permit application.

A discussion followed regarding the revision of the NOD review cycle procedure. Mr. D. Duncan (EPA) stated that Mr. M. Jaraysi (Ecology) has proposed the parties go through one NOD cycle, and then address all the comments through a series of technical working meetings until the comments have been resolved. At that point the permit would be revised and resubmitted. This new procedure would eliminate unnecessary review cycles, thereby saving time and money. Mr. Anderson stated that he would discuss the request for an extension with his supervisor, and that he would also contact Mr. Jaraysi to ensure a uniform policy of handling the review cycle.

#### 4. GENERAL TOPICS

- Action item 4-21-93:1, Ecology will bring RL's 6-2-92 immiscible phase separation letter to Ecology's attention for a response, was closed. Mr. Anderson stated a letter dated August 19, 1993 was transmitted with the information demonstrating what is required for performing separation processes without a permit.
- There were three new action items: WHC will transmit a draft letter to Ecology and EPA of the project response to the conceptual design; WHC will send Dan Duncan a copy of the outstanding NOD comments that have not been resolved; and Ecology will review WHC's request for extension regarding resubmission of the permit application.
- The next Unit Managers Meeting was scheduled for December 16, 1993.

Attachment 3

222-S LABORATORY COMPLEX  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington

September 29, 1993  
1:00 p.m. - 2:00 p.m.

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Gary Anderson	Ecology	(206) 407-7139
Joan Bartz	MACTEC	(509) 372-2008
John Beyer	WHC	(509) 372-2332
Steve Brey	WHC	(509) 373-2960
Paula Clark	RL	(509) 376-4718
Dan Duncan	EPA	(206) 553-6693
Danny Evans	KEH	(509) 376-6259
Gerry Hendricks	MACTEC	(509) 946-3687
Steve Joyce	WHC	(509) 372-0826
Kathy Knox	WHC	(509) 372-3596
Chuck McVey	WHC	(509) 372-0926
Donna Wanek	RL	(509) 376-5778
Russell Warren	RL	(509) 376-7330
Jay Warwick	WHC	(509) 373-3073
Joel Williams Jr	WHC	(509) 376-4782

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Attachment 4

222-S LABORATORY COMPLEX  
Unit Managers Meeting (Videoconference)  
Federal Building, Room 784B  
Richland, Washington

September 29, 1993  
1:00 p.m. - 2:00 p.m.

Action Items

<u>Action Item</u>	<u>Description</u>
04-21-93:1	Mr. G. Anderson (Ecology) will bring RL's 6-2-92 immiscible phase separation letter to Ecology's attention for a response.  CLOSED (9-29-93)
09-29-93:1	WHC will transmit a draft letter to Ecology and EPA of the project response to the conceptual design for 219-S. ACTION: J. F. Williams Jr (WHC)  OPEN
09-29-93:2	WHC will send Dan Duncan (EPA) a copy of the outstanding NOD comments that have not been resolved. ACTION: J. F. Williams Jr (WHC)  OPEN
09-29-93:3	Ecology will review WHC's request for extension regarding resubmission of the permit application. ACTION: G. Anderson (Ecology)  OPEN

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**Attachment 5**

**222-S LABORATORY COMPLEX  
Unit Managers Meeting  
Federal Building, Room 784B (Videoconference)  
Richland, Washington**

**September 29, 1993  
1:00 p.m. - 2:00 p.m.**

**ECOLOGY LETTER DATED 9-9-93 TO RL  
REGARDING CONCEPTUAL DESIGN REPORT FOR PROJECT W-178, MILESTONE M-32**

917322-000



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98501-0711 • (206) 459-6000

September 9, 1993

Mr. James D. Bauer  
U. S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Dear Mr. Bauer:

Re: Conceptual Design Report for Project W-178, Milestone M-32

I have received the Conceptual Design Report, 219-S Secondary Containment Upgrade, Page W-178, Kaiser Engineers Hanford Company, Richland, Washington, 1993. I have reviewed this report and have the following comments:

This report proposes a completely different solution to the problem of secondary containment than the solution proposed in the engineering study. Further, it proposes a solution that is inferior to the engineering study solution from a regulatory standpoint. I believe that double-shell tanks are better than the tank and liner system proposed, because the tank and liner requires a sump that cannot be completely cleaned. To permit the tank and liner system proposed, we will have to waive the requirements of WAC-173-303. In addition, installation of the liner will require more exposure to safety hazards than a double-wall tank. Please explain why the double-shell tank solution was abandoned.

Providing that a sump is approved, why is the steam-jet pump being abandoned? Steam-jet pumps have excellent performance at low suction head. Does the proposed air operated pump have the same scavenging capacity as the steam-jet pump?

The "sump" paragraph on page six (6), implies that the concrete floor of the tank vaults are thick enough to cut a sump of adequate depth in the existing concrete floor without penetrating the floor. Please furnish a sketch of the proposed sump to show how it will be built.

RECEIVED  
SEP 14 1993  
DOE-RL/CCC  
193-RPA-418  
11 10 93

904-073116

Mr. James D. Bauer  
September 9, 1993  
Page 2

These questions are not critical objections, so that you should continue your design effort. Considering the ambiguous status of the Tri-Party Agreement at this time, I can only issue a good faith acknowledgement of this good faith submittal.

If you have questions about this letter, please call me at (206) 438-7558.

Sincerely,



Gary Anderson, P.E.  
Nuclear and Mixed Waste Management Program

GA:dr

cc: Becky Austin, WHC  
Paul Carter, DOE  
Dan Duncan, EPA  
Sue Price, WHC  
Doug Sherwood, EPA  
Donna Wanek, DOE

9473220-1070

**Attachment 6**

**222-S LABORATORY COMPLEX  
Unit Managers Meeting  
Federal Building, Room 784B (Videoconference)  
Richland, Washington**

**September 29, 1993  
1:00 p.m. - 2:00 p.m.**

**222-S LABORATORY COMPLEX  
STATUS OF PROJECT UPGRADES**

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9413220.4072

**222-S LABORATORY COMPLEX**  
**UNIT MANAGERS MEETING**  
**STATUS OF PROJECT UPGRADES**

**September 22, 1993**

- **Project W-041H Environmental Hot Cell Expansion**

- **Status:** On schedule, all Hot cells to be in place by May 1993.  
Encased Drain lines in place (not connected to 219-S yet)

- **Project W-087 222-S Radioactive Liquid Waste Line Replacement**

- **Status:** On schedule, revalidation completed in May 1993,  
definitive design has been initiated.

**Part of TPA Milestone M-32**

**January 1997 Start Up date**

- **Project W-178 219-S Secondary Containment Upgrade**

- **Status:** Conceptual design complete and approved by DOE-RL, validation has been completed.

**Part of TPA Milestone M-32**

**January 1996 set for completion of definitive design**

- **Replace 222-S Dangerous and Mixed Waste Storage Area Storage Modules**

- **Status:** Bid will be awarded for purchase of storage modules by end of September.

Attachment 7

222-S LABORATORY COMPLEX  
Unit Managers Meeting  
Federal Building, Room 784B (Videoconference)  
Richland, Washington

September 29, 1993  
1:00 p.m. - 2:00 p.m.

ECOLOGY LETTER TO DOE-RL DATED JULY 21, 1993  
REGARDING REQUEST FOR EXTENSION OF TIME, 222-S LABORATORY PERMIT

947220.405



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

July 21, 1993

Mr. James D. Bauer  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Dear Mr. Bauer:

Re: Request for Extension of Time, 222-S Laboratory Permit

I have reviewed your request for an extension of time for the submittal of Revision 1 of the Hanford Facility Dangerous Waste Permit Application, 222-S Laboratory Complex, Revision 1 (TSD-2-1).

Due to the present state of affairs brought about by the renegotiation of the Tri-Party Agreement, we are willing to wait for submission of Revision 1 of this application until a clear course of remedial action is decided upon for the site as a whole. Should some, but not all, of the projects included in the permit still not be approved by Department of Energy headquarters at the end of the extension period granted below, it will be required that Revision 1 be submitted without the unapproved projects.

An extension of 180 days is granted for resubmission of Revision 1 of the subject permit application.

If you have any questions about this letter, please call me at (206) 438-7558.

Sincerely,

  
Gary Anderson, P.E.  
Nuclear and Mixed Waste Management

GA:jr

- cc: Becky Austin, WHC
- Marsha Bell, WHC
- Roger Bowman, WHC
- Cliff Clark, DOE
- Paula Clark, DOE
- Dan Duncan, EPA
- Doug Sherwood, EPA

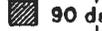
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R. C. BOWMAN

AUG 2 1993

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# Hanford Facility Permit 222-S Laboratory Complex Unit Inclusion Schedule

#	Name	Start	Finish	1991	1992	1993	1994	1995	1996	1997	1998
1	Ecology Review	12/31/91	11/11/92			120 days (317 days actual)					
2	DOE-RL Response (NOD Response Table)	11/12/92	3/11/93				120 days				
3	Ecology Review (Review NOD Response Table)	3/12/93	7/9/93				20 days				
4	UMM to resolve issues	7/10/93	10/7/93				90 days				
5	DOE-RL Revise Document (Submit Rev. 1)*	10/8/93	8/3/94					120 days (180 day extension granted)			
6	Ecology Review (Review Rev. 1)	8/4/94	12/1/94					120 days			
7	DOE-RL Response (NOD Response Table)	12/2/94	3/31/95						120 days		
8	Ecology Review (Review NOD Response Table)	4/1/95	6/29/95						90 days		
9	UMM to resolve issues	6/30/95	9/27/95						90 days		
10	DOE-RL Revise Document (Submit Rev. 2)	9/28/95	12/26/95						90 days		
11	Ecology Review (Submit Rev. 2)	12/27/95	3/25/96							90 days	
12	DOE-RL Response (Final NOD Response Table)	3/26/96	6/23/96							90 days	
13	Ecology Review (Review Final NOD Response Table)	6/24/96	9/21/96								90 days
14	UMM to resolve issues (Review Final NOD Response Table)	9/22/96	12/20/96								90 days
15	DOE-RL Revise Document (2 UMM meetings)	12/21/96	3/20/97								90 days
	Ready for Incorporation into Hanford Facility Permit	3/20/97	3/20/97								
	Next Hanford Facility Permit Modification Window	4/20/98	10/16/98								

File: 222S-B.MPW  
Date: 8/31/93  
Permitting Lead: J. F. Williams Jr.

Scheduled  Completed  Milestone 

\* Extension requested based on significant design changes (Projects W-041, W-087, and W-178).

Distribution:

G. Anderson	Ecology	
B. A. Austin	WHC	B2-35
J. K. Bartz	MACTEC	A4-35
M. L. Bell	WHC	T6-16
R. C. Bowman	WHC	H6-24
S. L. Brey	WHC	T6-12
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
P. K. Clark	RL	A5-21
D. L. Duncan	EPA	HW-106
J. G. Francik	WHC	T6-12
M. J. Hall	WHC	T6-07
J. M. Hennig	RL	A5-21
P. J. Mackey	WHC	B3-15
A. G. Miskho	WHC	H6-30
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
G. J. Warwick	WHC	T6-12
J. F. Williams Jr.	WHC	H6-24

ADMINISTRATIVE RECORD: 222-S Laboratory Complex, TS-2-1  
[Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to Kathy Knox, WHC (H6-24),  
(509) 372-3596

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94325 1078