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Meeting Minutes Transmittal - Approval

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2100
Richland, Washington

Meeting Held September 10, 1996
From 2:00 PM to 3:30 PM



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

Ellen M. Mattlin Date: 10-10-96
Ellen M. Mattlin, Project Manager, RL

Jeanne U. Wallace for Date: 10/10/96
Jeanne U. Wallace, Project Manager, Washington State Department of Ecology

300 Area WATS, WHC Concurrence

Roger Bowman for Date: 10/10/96
Roger Bowman, Contractor Representative, ~~WHC~~ PFSH _{at}

Ivan L. Metcalf Date: 10/10/96
Ivan L. Metcalf, Contractor Representative, ~~WHC~~ _{BWHC}

Purpose: Discuss Permitting Process

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

- Attachment 1 - Meeting Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items

Distribution:

| | | |
|----------------------|---------|-------------|
| R. C. Bowman | WHC | H6-24 |
| M. R. Hahn | RL | R3-79 |
| S. N. Luke | WHC | H6-24 |
| E. M. Mattlin | RL | A5-15 |
| I. L. Metcalf | WHC | L6-26 |
| J. A. Remaize | WHC | L6-26 |
| J. W. Rich | WHC | L6-26 |
| F. A. Ruck | WHC | H6-22 |
| J. M. Steffen | WHC | H6-23 |
| J. J. Wallace | Ecology | - Kennewick |
| T. A. Wopley | Ecology | - Kennewick |
| Field File Custodian | WHC | H6-08 |
| RCRA File | WHC | H6-23 |

ADMINISTRATIVE RECORD: 300 Area Waste Acid Treatment System Closure Plan,
TS-3-1 [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Hanford Files,
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Please send comments on distribution list to Scott Luke (H6-23),
(509) 372-1667.

Attachment 1

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2100
Richland, Washington

Meeting Held September 10, 1996
From 2:00 PM to 3:30 PM

Agenda

1. Approval of Past PMM Minutes
2. Status PMM Action Items
None
3. Status Closure Activities
 - Carry over from waste designation meeting (held 8/21)
 - Provide to Ecology:
 - . Sample results of centrifuge sludge
 - . Confirm Table 4-2 of the closure plan
 - . Information regarding leaks to 313 Building floor
 - Phase 1 closure activities - 313 Building
 - Still awaiting air permit
 - Some PCBs detected in pump oils
 - Status of Ecology closure plan NODs
 - DIP
 - Revised DIP NOD Responses
 - . NOD #1 (soil policy)
 - . NODs #4 & 5 (designation)
 - . NOD #6 (page change)
 - . NOD #8 (soil policy)
 - Schedule for submittal of revised DIP text
 - Status interface with 300-FF-2 OU for later soil closure
4. New Business
5. Schedule Next Workshop
6. Schedule Next Project Managers Meeting

Attachment 2

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2100
Richland, Washington

Meeting Held September 10, 1996
From 2:00 PM to 3:30 PM

Summary of Discussion and Commitments/Agreements

1. Approval of Past PMM Minutes

The minutes of the August 8, 1996 PMM were signed by the RL and Ecology Project Managers.

2. Status PMM Action Items

None

3. Status Closure Activities

- Carry over from waste designation meeting (held 8/21)

- Provide Ecology with sample results for centrifuge sludge. Ecology confirmed receipt of filterpress sludge barrel sampling results and composite sampling results for 36 barrels of new centrifuge sludge (NCS) generated during the month of June, 1986. The results showed that each barrel was analyzed for uranium and the barrels were analyzed for primary process parameters pH, Uranium, ions, and metals from one monthly composite sample.

- Confirm Table 4-2 of the closure plan. A copy of portions of one NCS logbook was provided to Ecology to confirm the barrel count provided in Table 4-2 of the *300 Area Waste Acid Treatment Closure Plan*, DOE/RL-90-11, Rev. 1. The logbook identified that up to 3 barrels of sludge per shift could have been generated by the centrifuge during its period of operations (1985 to 1989) thus confirming the total number of 938 provided in Table 4-2 of the closure plan.

- Information regarding leaks to 313 Building floor. Information was discussed that shows a potential pathway to 313 Building subfloor soils of minor spills from RCRA operations. Ecology reiterated that this means that clean closure of these soils cannot occur without verification sampling. Because documented past practice contamination exists at possible RCRA spill locations, soil sampling would likely not support clean closure and so will not be attempted during Phase 1 closure.

- **Still awaiting air permit**

WHC (Mr. J. W. Rich) indicated that the start of WATS tank system dismantling is dependent upon obtaining an air permit from the Washington State Department of Health (WDOH). The air permit application was sent to the State of Washington, Department of Health (WDOH) by RL on 8/27/96 for approval. The WDOH has 90 days to respond to this application.

- **Some PCBs detected in pump oils**

WHC (Mr. J. Rich) identified that during 313 Building waste designation sampling, a small quantity of lubricating oils from WATS pumps in the 313 building and some oil smears on pump exteriors were sampled for PCBs. The total amount of oil drained from all pumps was approximately 1 gallon. These pump lubricants have no bearing on waste managed at the unit. Oil samples underwent PCB, TCLP metals, and organics (OCA) analysis. The facility is preparing a summary identifying affected equipment, sampling, analytical results, and the plan of action for managing this waste. The summary is at WHC and RL for review.

The PCB sampling results were discussed. WHC (Mr. J. W. Rich) indicated that the Toxic Substances Control Act (TSCA) regulatory limit for PCB oils from these pumps as non-electrical equipment is 50 ppm. The regulatory cleanup level for the smears is 100 micrograms/100cm square. Also, as non-electrical equipment, the W001 state sources listed waste code identified in WAC 173-303-9904 does not apply to this waste. No smear exceeded surface contamination levels and only the oils of WATS Pump 8 potentially exceeded 50 ppm. However, because the Pump 8 sample at 4.1 ppm showed nonregulated and its duplicate at 94.0 ppm showed regulated, the duplicate sample will be reanalyzed. Upon receipt of the reanalysis, Ecology will be provided this information.

4. **Status of Ecology Closure Plan NODs**

Ecology (Mr. T. A. Wooley) indicated that NODs were in process and would be arriving soon. He indicated that because Phase 1 DIP NODs address issues related to all phases of closure, the delay in providing closure plan NODs was not delaying the closure plan approval process.

5. **Decontamination/Inspection Plan (DIP)**

- **Revised DIP NOD Responses**

Ecology confirmed receipt of the revised DIP NOD response table that was electronically transmitted on 9/9/96 but had not as yet reviewed the responses. WHC presented a brief summary of revised responses to ensure that they properly address the issues.

- **NOD #1 (soil policy).** The revised response reflects newly proposed Phase 1 (313 Building) closure strategy of clean closing the building but closing soils at a later date in conjunction with the schedule, methods, and cleanup levels in the future Record of Decision (ROD) for the CERCLA 300-FF-2 OU.

- **NODs #4 & 5 (designation).** Responses to NODs # 4 and #5 regarding waste designation were combined into one response addressing Ecology concerns regarding the designation process and the impact of component accessibility on designation. WHC (Luke) reiterated that residue characterization is ongoing via TCLP sampling that would determine whether residues are hazardous. Until sample results are available waste designation will not occur. The process for making waste management decisions will follow the logic flowpath chart presented at the 8/21 waste designation once the residue characterization that is based on these sampling results is available.
- **NOD #6 (page change).** Revised verbiage as agreed upon during the last PMM had inadvertently been omitted from the revised NOD response table and will be incorporated into the response table and forwarded to Ecology.
- **NOD #8 (soil policy).** This NOD concerned soil closure policy and was revised in accordance with newly proposed soil closure policy addressed in the response to NOD #1.
- **Additional Ecology DIP concerns.** Ecology restated concerns regarding the level of decontamination detail and the affect of the 300-FF-5 Interim ROD on Phase 1 closure and chapter 5.0 of the closure plan.

Level of detail. Ecology (Wooley) referenced WAC 173-303-610 (3)(a)(iv) and (v) in saying that the DIP as an extension of the closure plan does not provide enough detail regarding decontamination. It was discussed that information affecting the outcome of closure activities, such as major steps necessary to complete closure activities, would be an appropriate level of DIP detail. WHC indicated that detail regarding decontamination to meet 'clean debris surface' standards could be expanded to this level. However, because residue characterization is still ongoing, decontamination necessary to meet nonhazardous waste designation criteria for the removed components remains in question. WHC (Rich) identified that extensive detail will exist in the field work packages, even where not provided in the DIP.

Impact on WATS closure of 300-FF-5 Interim ROD. Ecology stated that the closure plan approach to groundwater has been affected by the 300-FF-5 Groundwater OU Interim ROD. This ROD combines the 300-FF-2 OU into one source and groundwater OU. It makes the 300-FF-2 OU responsible for groundwater that is not already part of 300-FF-5 (i.e., uranium and tritium groundwater plumes emanating from 300-FF-5). The 300-FF-2 OU will include groundwater affects from the uncharacterized soils of the low priority 300-FF-2 waste sites - primarily those soils under 300-FF-2 buildings.

WHC indicated that groundwater closure strategy will now focus on demonstrating that WATS soil characterization may keep to the 300-FF-2 OU schedule in the TPA because 1) no emergency groundwater condition exists due to WATS operations 2) WATS has not impacted groundwater in the past, 2) the unit will not impact groundwater while awaiting future soil closure, 3) groundwater monitoring will continue until final closure. It will also clarify that WATS groundwater is now integrated

with the 300-FF-2 (source and groundwater) OU - not the 300-FF-5 (groundwater) OU.

- Schedule for submittal of revised DIP text

Because RL has not received official Ecology concurrence with DIP NOD responses, no date was set for transmitting revised DIP text to Ecology. However, WHC indicated that revision of DIP text could proceed guided by NOD responses and Ecology input from discussions and that revised text could be generated, approved by RL, and possibly submitted to Ecology in early October.

- Status interface with 300-FF-2 OU for later soil closure

Ecology (Wooley) recognized that the new 313 Building soil closure policy had changed the WATS closure from a RCRA stand alone activity to a RCRA/CERCLA integrated activity. Ecology also indicated that the schedule for closure plan approval via inclusion into Mod C of the Hanford Facility RCRA Permit (RCRA Permit) would precede the 300-FF-2 OU ROD. Because of this schedule disparity, Ecology reiterated its desire to see acceptance by the 300-FF-2 OU of the RCRA scope of work as soon as possible. RL (Mr. M. Hahn, EM-60 Program) indicated that preliminary discussions with Mr. R. McLeod (RL, EM-40 Program) had stated that the EM-40 program may accept the scope of work associated with closing out the RCRA soils under some, unspecified conditions.

5. New Business

RL's GSSC representative (Ms. S. K. Johansen) indicated that she will not be in attendance for the October PMM.

6. Schedule Next Workshop Meeting Date

No date was set for the next closure workshop.

7. Schedule Next PMM Date

The next Project Managers Meeting was scheduled for October 10, 1996, tentatively for 2:00.

