

**Meeting Notes****Discussion of Milestones Related to Waste Management Area C Closure, SST Closure Plan content, and Permit modifications**

Meeting Date: November 21, 2013  
 Location: Ecology Building

Purpose: Discuss HFFACO milestones M-045-61, -62 and -82 to better define the relationships among these milestones and the content of the deliverables.

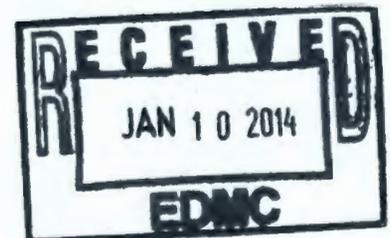
Attendees: Jeff Lyon (Ecology), Jared Mathey (Ecology), Maria Skorska (Ecology), Mike Barnes (Ecology), Joni Grindstaff (ORP), Lori Huffman (ORP), Mary Burandt (ORP), Doug Hildebrand (ORP), Tony Miskho (WRPS), Jeff Luke (WRPS), Dan Parker (WRPS), Cindy Tabor (WRPS), Susan Eberlein (WRPS)

**Background:**

Hanford Federal Facilities Agreement and Consent Order (HFFACO) milestones M-045-61, M-045-62 and M-045-82 (copied below) have been listed as "to be missed" at the recent monthly project managers meetings. These milestones have been affected by budget constraints and delays in related activities. Today's meeting continues the process of defining what each deliverable under these milestones should comprise, and when these deliverables can be developed, to support progress on closure of Waste Management Area (WMA) C.

M-045-61	Submit to Ecology for review and approval as an Agreement primary document, a Phase 2 RCRA Facility Investigation/Corrective Measures Study Report for WMA C.	12/31/2014
M-045-62	Submit to Ecology for review and approval as an Agreement primary document a Phase 2 Corrective Measures Implementation Work Plan for WMA C.	06/30/2015
M-045-82	Submit complete permit modification requests for Tiers 1, 2, & 3 (see Appendix I) of the SST System, to support final closure requirements for WMA C.	09/30/2015

Appendix I of the HFFACO indicates that the Tier 1 closure plan addresses the Single Shell Tank (SST) system, a Tier 2 closure plan addresses each WMA, and a Tier 3 closure activity plan addresses each individual component or group of components (e.g. 100 series tanks, vaults, pipelines).



## Topics discussed:

The topics discussed are summarized below. No specific decisions were made. One action was assigned to develop additional information for future discussion.

- Mike Barnes (Ecology) reminded the group that any retrieval actions needed for the waste in tank C-301 and the CR-vault tanks might be performed more efficiently if it is done while the other waste retrieval infrastructure is in place.
- Susan Eberlein (WRPS) summarized the logic/schedule ideas that came out of the previous meeting:
  - A "Clean Closure Document" is needed to demonstrate that clean closure is impracticable. This document can be produced after the Tank Closure and Waste Management (TC&WM) Environmental Impact Statement (EIS) Record of Decision (ROD).
  - A Tier 1 (Framework) Closure Plan to address the SST will be provided after the Clean Closure Document. The Tier 1 closure plan can be relatively high level, and will provide a road-map to the subsequent plans.
  - A Tier 2 Closure Plan for WMA C and a Corrective Measures Study (CMS) for WMA C need to be generated in an integrated manner. Soil remediation actions should be recommended with an understanding of what equipment is left in place, and some equipment actions will be affected by planned soil actions. Thus the Tier 2 closure plan and the CMS will probably be developed at the same time.
  - The Tier 3 component closure activity plans and the Corrective Measures Implementation Plan (CMIP) can be developed after the Tier 2 closure plan and CMS.
- Discussion led to the following ideas:
  - The Tier 2 closure plan and CMS will capture WHAT is to be done, while the Tier 3 plans and CMIP will describe HOW it will be done.
  - The plan for the groundwater operable unit is also needed at the same time as the Tier 2 closure plan and CMS.
  - Section 2.2 of HFFACO Appendix I appears to allow the option to address the remedial actions for pipelines in the CMS/CMIP rather than in a separate Tier 3 closure activity plan, if the action for pipelines and soil are closely coupled.
  - Documents used to meet closure plan requirements will have to be incorporated into the permit by some mechanism. It was not clear how the CMIP would be incorporated into the permit. A decision on that process is needed.
  - There is not currently enough information to develop schedules for submittals of all the Tier 3 closure activity plans. For example, the schedule for retrieval of waste from C-301 and CR-vault has not been finalized because the method for retrieval has not been determined. Until more is known about the post-

retrieval configuration for C-301 and CR-vault, the schedule for submittal of the Tier 3 closure activity plan(s) cannot be finalized.

- Maria Skorska noted that usually a CMS identifies the potential alternatives for soil and structures. Without any HFFACO guidance to the contrary, this would include:
  - a. SSTs, tank C-301, CR-vault, pipelines and all other auxiliary equipment and structures,
  - b. contaminated vadose zone, and
  - c. contaminated groundwater.
- Since the HFFACCO specifically identifies the Tier 2 and Tier 3 closure plans for structures, rather than the CMS, the appropriate plans need to be referenced in the CMS.
- Some documents already exist that could be referenced in the CMS, for example, the pipeline feasibility study developed under milestone M-045-80.
- According to HFFACO Appendix I, the combination of Tier 1, 2 and 3 closure plans (plus CMS/CMIP) serve to meet closure plan documentation requirements for components and soil.
- Mary Burandt asked whether the field work implementation would dictate how specific closure actions needed to be grouped. Jared Mathey suggested that a specific sequence or grouping of the Tier 3 closure activity plans may be required to support effective field implementation.
- Options for Tier 3 closure activity plan submittal may include:
  - Submit the Tier 2 closure plan that describes WHAT will be done for each component, along with a compliance schedule for the submittal of the Tier 3 closure activity plans.
  - Submit the Tier 2 closure plan that describes WHAT will be done for each component, along with a HFFACO change package that establishes a milestone for the submittal of the Tier 3 closure activity plans.
  - Submit the Tier 2 closure plan and one or more of the Tier 3 closure activity plans at the same time, along with a compliance schedule or milestone for the remaining plans.
  - Other options to be determined.
  - The decision on what approaches will be acceptable probably needs to be made by senior management.
- Jeff Lyon indicated his interest is seeing what documents can be developed within the framework of the existing milestone dates. He also stated he wanted to see the proposed sequence of submittals, and definition of dates to the extent possible. He was not yet sure that the Tier 2 closure plan and CMS needed to be submitted at the same time.
- There was additional discussion of the relationship between the plans and the permit. There was discussion regarding the ability to submit some of the needed permit information individually, and having it incorporated into the permit, prior to having complete information available.

