

MEETING MINUTES  
 UNIT MANAGERS MEETING  
 HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
 MILESTONE M-22-00  
 OCTOBER 13, 1989

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From/Appvl: *L. A. Garner* Date: 10/17/89  
 L. A. Garner, WHC

Approval: *A. J. Knepp* Date: 10/20/89  
 A. J. Knepp, DOE Unit manager

Approval: *T. M. Michelena* Date: 12/14/89  
 T. M. Michelena, Ecology Unit Manager

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The first Unit Manager's meeting for Hanford Federal Facility Agreement Milestone M-22-00 was held at 9:00 a.m. on October 13, 1989. Mr. Paul Day, the EPA Unit Manager for this milestone was unable to attend the meeting. A copy of the material presented to Mr. Toby Michelena of the Washington Department of Ecology is attached for information. Michelena was also provided with copies of the action schedules for all interim status facilities subject to negotiation under Milestone M-22-00.

October 13, 1989

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Attendees:

T. Michelena - Ecology  
 A. K. Knepp - DOE  
 L. A. Garner - WHC



Mr. Michelena first noted that the five "Treatment by Generator" (TBG) requests submitted by Hanford for T Plant, PUREX, PFP, 204-AR Vault, and 222-S had been denied. This denial is detailed in a letter transmitted by Ecology on Wednesday, October 11, 1989. The letter also identifies further information which may be prepared by the facilities to support resubmittal of the "Treatment by Generator" requests. Mr. Michelena went on to state that since these requests had been denied, he wanted to negotiate the outstanding corrective actions at the TBG facilities under Milestone M-22-00.

Mr. Michelena went on to indicate that he was concerned about Ecology's enforcement authority under Milestone M-22-00, and wanted to ensure that the wording of the interim milestones did not preclude Ecology from taking action

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to enforce the regulations prior to the final milestone date of September 1991. He initially proposed that each corrective action date become an interim milestone under M-22-00. The Unit Managers discussed this proposal, and Ms. Lisa Garner indicated that it would lead to a very large number of milestones due in a limited period of time (approximately 20 months), and would be a considerable administrative challenge. Mr. Michelena agreed to review the open actions for the facilities in question further, and Ms. Garner and Mr. Tony Knepp agreed to develop draft milestone language for M-22-00.

The next Unit Manager's meeting for this milestone will be held on October 27, 1989. The agenda for this meeting includes a discussion of the overall strategy for developing the interim milestones as well as compliance issues for the Single-Shell Tanks.

**MEETING MINUTES**

**UNIT MANAGERS MEETING**

**HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER**

**MILESTONE M-22-00**

**OCTOBER 27, 1989**

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From/Appvl: *LA Garner* Date: 12/15/89  
L. A. Garner, WHC

Approval: *A. J. Knepp* Date: 2/13/90  
A. J. Knepp, DOE Unit Manager

Approval: \_\_\_\_\_ Date: \_\_\_\_\_  
T. M. Michelena, Ecology Unit Manager

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October 27, 1989

**Attendees:**

- Toby Michelena, Ecology
- Tony Knepp, DOE-RL
- Robert Baumhardt, WHC
- Steve Brey, WHC
- Brad Erlandson, WHC
- Lisa Garner, WHC
- Tony Miskho, WHC
- Emily Porter, WHC

**Subject: Negotiation of Enforceable Action Schedules (M-22-00)**

The purpose of the subject meeting was to discuss draft enforceable action schedules developed by WHC and DOE-RL pursuant to milestone M-22-00. Mr. Michelena had reviewed the draft schedules prior to the meeting and came prepared with specific topics to discuss.

**Treatment By Generator**

WHC staff indicated that the requests for treatment by generator (TBG) status, rejected by Ecology, would be resubmitted early next year. A decision on whether to resubmit the TBG request for T Plant may depend on whether it is decided to clean-close the facility. A decision on T Plant closure is expected in November 1990.

Mr. Michelena indicated he would send a copy of a TBG request that had been granted to WHC/DOE-RL, for information purposes. He also requested that the TBG requests be identified as an interim milestone in M-23-00.

#### Part A Permit Application Withdrawal

WHC staff indicated that requests for part A permit application withdrawals, rejected by Ecology, would likely be resubmitted in December, 1989. Mr. Michelena believes that it is unlikely that the 1706-KE permit application could ever be withdrawn. He also asked that this item be included as an interim milestone in M-23-00.

#### New TSD Units

It was agreed that the letter accompanying the new action schedule (revised milestone M-23-00) should include a statement that all new TSD facilities or facilities that have not yet operated will be in compliance with interim status requirements prior to start-up.

#### Petitions for Rule-Making

Mr. Michelena indicated he would be ready to discuss petitions for rule-making on labeling and inspections sometime in mid-January. He also stated it was unlikely that the petitions would be granted as they are too broad. He indicated a preference for dealing with individual inspection and labeling problems on a case-by-case basis, using Ecology's performance standards to justify any deviations for regulatory requirements.

#### Table D-4

It was agreed that Table D-4 to the Federal Facility Agreement and Consent Order would be modified by WHC to reflect open and closed corrective actions.

#### Milestone Title

Mr. Michelena agreed to talk to Mr. Stanley about the acceptability of changing the title of major milestone M-23-00 to: Complete Interim Status Corrective Actions.

#### Waste Analysis Plans

WHC agreed to review Mr. Michelena's request that the dates proposed for completion of waste analysis plans be reviewed and made as early as possible. Mr. Michelena requested a date of June 1990.

### Dangerous Waste Tanks

Mr. Michelena was provided with a briefing paper on dangerous waste tank systems and was told that WHC and DOE-RL would be willing to begin discussion of tank issues in the near future, but would not be in a position to begin negotiation of actual compliance schedules until sometime in January 1990.

### Inactive TSD Units

Mr. Michelena was presented a table showing corrective actions for inactive surface impoundments and land disposal units. The table identified requirements that WHC believes are not applicable to TSD units which no longer store or receive dangerous waste.

Mr. Michelena disagreed with WHC's contention that waste analysis plans are not required for these units if proper waste characterization has been completed and indicates waste receipts are nondangerous. Mr. Michelena also believed a contingency plan addressing response to the inadvertent discharge of a dangerous waste would be appropriate. He did not disagree with other requirements marked as inapplicable on the table. A copy of this table is attached.

This issue remained unresolved.

### 222-S Laboratory

It was agreed that March 1990 was an acceptable date for the lab to complete all interim status corrective actions at the storage pad.

### 3718-F

It was agreed that two milestones would be required for this facility, (1) a decision point for operation or closure and (2) a date to complete corrective actions if the facility will operate.

### B-Plant

Mr. Michelena indicated that this facility would require some interim milestones be established due to the late completion date for all interim status corrective actions (September 1991).

### Single Shell Tanks

Mr. Michelena requested that the waste analysis plan be completed by mid-1990.

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WHC indicated the fire code inspection required by WAC 173-303-395 may not be applicable, if SSTs are found to have no reactive wastes; that the frequency of inspections would be upgraded; and that training would be complete by September 1990.

WHC asked for a waiver on retrofitting ancillary equipment, pointing out that all but seven or eight tanks will be pumped by the time the saltwell lines are 15 years old, and those remaining tanks will be pumped within two years from that date. Mr. Michelena agreed that would probably be ok, but he asked that WHC look into more and/or better monitoring devices or systems for leak detection.

WHC requested that the diversion box inspection to determine which boxes held lead counterweights, be postponed until final closure. Mr. Michelena requested a drawing of diversion boxes with a description of how they were sealed (drawing attached). Mr. Michelena also requested information on ground freezing. Unfortunately, no information on this subject could be located.

WHC asked for a waiver of the integrity assessment requirement. Mr. Michelena agreed with WHC and indicated that he would address the issue of how to acknowledge that SSTs cannot meet all of the requirements.

Inactive Interim Status Facilities

UNIT	WAC 173-303-300 (WASTE ANALYSIS PLAN)	WAC 173-303-310 (SECURITY)	WAC 173-303-320 (INSPECTION)	WAC 173-303-330 (TRAINING)	WAC 173-303-340 (EMERGENCY EQUIPMENT)	WAC 173-303-350 (CONTINGENCY PLAN)	WAC 173-303-380 (RECORD KEEPING)	WAC 173-303-395 (OTHER GENERAL REQUIREMENTS)	40 CFR 265 SUBPART I (CONTAINER MANAGEMENT)	40 CFR 265 SUBPART J (TANK REQUIREMENTS)
216-A-36B	N/A	A	7/89 8/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
1325-N	N/A	A	6/89 6/89 (C)	N/A	N/A	N/A	6/89 6/89 (C)	N/A	N/A	N/A
1324-N	N/A	A	A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1324-NA	N/A	A	A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1301-N CRIB	N/A	A	6/89 6/89 (C)	N/A	N/A	N/A	6/89 6/89 (C)	N/A	N/A	N/A
216-B-3 POND	N/A	A	7/89 8/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
216-A-29 DITCH	N/A	A	7/89	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
216-A-10	N/A	A	7/89 7/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
216-B-63 TRENCH	N/A	A	7/89 8/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
300 AREA PROCESS TRENCHES	N/A	6/89 6/89 (C)	4/89 5/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
2727-S STORAGE FACILITY	N/A	5/89 6/89 (C)	7/89 7/89 (C)	N/A	N/A	N/A	A	N/A	N/A	N/A
300 AREA SOLVENT EVAPORATOR	N/A	A	7/89 7/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A

## Inactive Interim Status Facilities

UNIT	WAC 173-303-300 (WASTE ANALYSIS PLAN)	WAC 173-303-310 (SECURITY)	WAC 173-303-320 (INSPECTION)	WAC 173-303-330 (TRAINING)	WAC 173-303-340 (EMERGENCY EQUIPMENT)	WAC 173-303-350 (CONTINGENCY PLAN)	WAC 173-303-380 (RECORD KEEPING)	WAC 173-303-395 (OTHER GENERAL REQUIREMENTS)	40 CFR 265 SUBPART I (CONTAINER MANAGEMENT)	40 CFR 265 SUBPART J (TANK REQUIREMENTS)
E-8 BORROW PIT	N/A	7/89 7/89 (C)	7/89 7/89 (C)	N/A	N/A	N/A	A	N/A	N/A	N/A
ASH PIT SITE	N/A	7/89 7/89 (C)	7/89 7/89 (C)	N/A	N/A	N/A	A	N/A	N/A	N/A
216-U-12 CRIB	N/A	A	7/89	N/A	N/A	N/A	A	N/A	N/A	N/A
2101-M POND	N/A	7/89 7/89 (C)	7/89 7/89 (C)	N/A	N/A	N/A	9/89	N/A	N/A	N/A
216-S-10 POND AND DITCH	N/A	12/89 7/89 (C)	7/89 8/89 (C)	N/A	N/A	N/A	12/89 10/89 (C)	N/A	N/A	N/A
100-D PONDS	N/A	7/89 7/89 (C)	7/89 7/89 (C)	N/A	N/A	N/A	7/89 8/89 (C)	N/A	N/A	N/A
304 CONCRETION FACILITY	N/A	A	7/89 7/89 (C)	N/A	N/A	N/A	7/89 7/89 (C)	N/A	N/A	N/A
1706-KE WASTE TREATMENT SYSTEM	N/A	A	7/89 6/89 (C)	N/A	N/A	N/A	6/89 6/89 (C)	N/A	N/A	N/A

TYPICAL  
ISOLATION  
METHODS

SD-WM-SAR-006  
REV 1

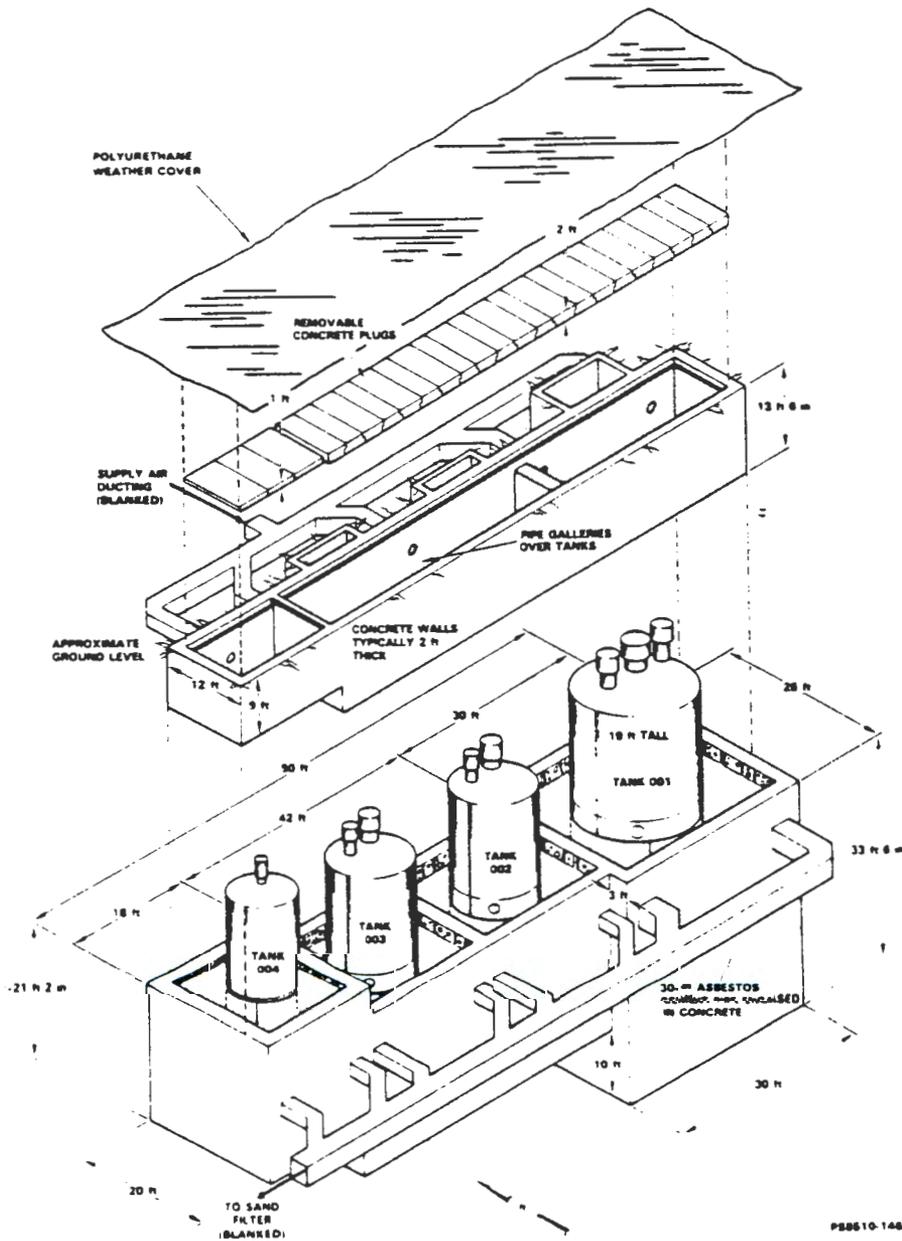


FIGURE 6-2. Typical Isolated Vault.

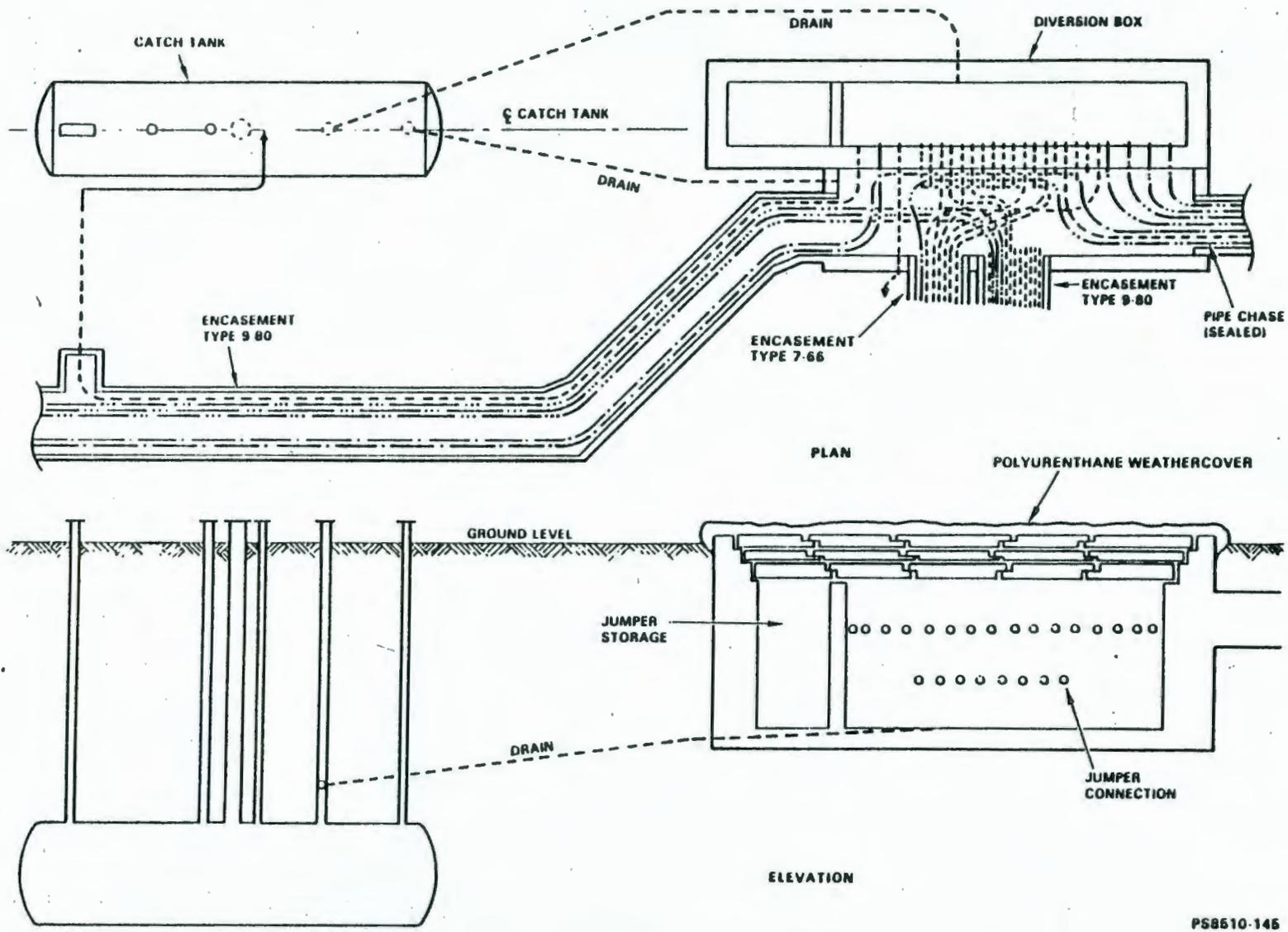


FIGURE 6-3. Isolated Transfer Facility.

PS8510-145

SD-WM-SAR-006  
REV 1

**TELEPHONE CONFERENCE MEMORANDUM**

Company: Westinghouse

Address: B2-19

[ ] INCOMING      [X] OUTGOING      DATE: November 17, 1989      TIME: 9:00 a.m.

WITH: Toby Michelena      OF: Ecology      PHONE: (206) 438-7016

WITH: Tony Knepp      OF: DOE-RL      PHONE: (509) 376-1471

Copies to: \_\_\_\_\_ Attendees \_\_\_\_\_ Address \_\_\_\_\_

Paul Crane	B2-19
Brad Erlandson	B2-19
Lisa Garner	B2-19
Rick Pierce	R2-80
Mike York	S6-65

Subject: NEGOTIATION OF MILESTONE M-22-00

<u>ENV/WHC</u>	<u>Lisa Garner</u>	<u>509/376-5969</u>
Department	Signature	Telephone #
<u>DOE/ERD</u>	<u>A. J. Knepp</u>	<u>509/376-1471</u>
Department	Signature	Telephone #
_____	_____	_____
Department	Signature	Telephone #

Summary of Conference

1. Provide new draft of milestone to T. Michelena by 11-27-89 for review (WHC).
2. Generate language on interim status tank negotiations (Ecology).
3. Remove PFP (and possibly PUREX) from M-23-01; add to letter as: resubmit TBG six months after facility restart (WHC).
4. Add statement to letter indicating completion of milestones makes them enforceable (WHC).
5. Delete the word "approval" from M-23-00 and insert "resolution" (WHC).
6. Determine if all waste analysis plans can be complete June 1990; insert interim milestone (WHC).
7. Determine how many contingency plans will be complete before October 1990 and show actual completion date. The 616 plan will have to be moved in to part B date.

8. Tighten up Low-Level Burial Ground dates related to TFB-3759 and TFB-3840 (WHC).
9. Insert interim milestone for B Plant cell four corrective actions (530, 550, and 840) (WHC).
10. Move TPL-440 bact to 5/30/90 (from 10/30/90).
11. Check on SST Waste Characterization Plan - is it equivalent to a WAP.
12. Change footnotes 1 and 3 of table.

MEETING MINUTES  
UNIT MANAGERS MEETING  
HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
MILESTONE M-22-00  
DECEMBER 14, 1989

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From/Appvl: *L. A. Garner* Date: 2-5-90  
                  L. A. Garner, WHC  
Approval: *A. J. Knepp* Date: 2-12-90  
                  A. J. Knepp, DOE Unit Manager  
Approval: \_\_\_\_\_ Date: \_\_\_\_\_  
                  T. M. Michelena, Ecology Unit Manager

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December 14, 1989

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Attendees:

P. J. Crane - WHC  
B. G. Erlandson - WHC  
L. A. Garner - WHC  
A. J. Knepp - DOE  
T. Michelena - Ecology

Proposed milestone for completion of interim status corrective actions were reviewed. All dates were acceptable to Ecology except those for completion of contingency plans and for completion of B Plant Cell 4 corrective actions.

Toby Michelena indicated that he felt the date for completion of contingency plans for six solid waste management facilities should be June, 1990, rather than the proposed date of October, 1990. Lisa Garner agreed to discuss this with facility management to see whether a change would be made.

Toby also believed that completion of corrective actions in Cell 4 of B Plant should be accelerated to December 1990. The proposed completion date was July, 1991. Lisa agreed to discuss the December 1990 date with facility management to see whether the actions could be completed by then.

Lisa agreed to call Toby on Friday, December 15, 1989, to report on these two proposed changes.