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Meeting Minutes Transmittal

PUREX DEACTIVATION MEETING
Federal Building, Room 784B
Richland, Washington

August 16, 1993
1:00 p.m. - 3:00 p.m.

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

Randall N. Krekel, DOE-RL, EAP — Date: 12-6-93

Dennis J. Washenfelder, WHC, PUREX — Date: 12/6/93

M. Jaraysi, Ecology — Date: 12-6-93

Daniel L. Duncan, EPA Region 10 — Date: 1/4/94

Purpose: Discuss PUREX Deactivation 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

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Attachment 1

PUREX DEACTIVATION MEETING
Federal Building, Room 784B
Richland, Washington

August 16, 1993
1:00 p.m. - 3:00 p.m.

Agenda

PERMITTING TOPICS

- Results of Interagency Meeting on August 13, 1993
  - RCRA permitting requirements
  - Air permitting requirements.

GENERAL TOPICS

- Initial NEPA Determination
- Action items
  - Past action items
  - New action items

Attachment 2

PUREX DEACTIVATION MEETING
Federal Building, Room 784B
Richland, Washington

August 16, 1993
1:00 p.m. - 3:00 p.m.

Summary of Discussion and Commitments/Agreements

PERMITTING TOPICS

- **Air Permitting Topics**

  Mr. D. Duncan (EPA) began the meeting by focusing on the air permitting requirements. Mr. Duncan stated that EPA had received a copy of RL/WHC's letter that was sent to Ecology, dated August 10, 1993, requesting concurrence on the approach for deactivation of the PUREX plant pursuant to WAC 173-460. Mr. B. King, who is the Ecology representative responsible for air permitting issues, was not present at the meeting. Mr. T. Tebb (Ecology) stated that he would contact Mr. King to obtain information regarding the air permitting issues.

  At EPA's request, Ms. J. Robertson (WHC) explained that the letter requests Ecology to allow RL/WHC to compare projected future emissions with emissions that are representative of normal operations of PUREX as opposed to the emissions over the last two-year period when PUREX was on standby. Ms. Robertson explained that if future emissions are compared to emissions resulting from normal operations, the future emissions would probably not be greater, and RL/WHC would not be required to go through a review process to obtain a new permit. Mr. Robertson stated that RL/WHC is awaiting Ecology acceptance of this proposal before providing emissions data to Ecology.

  Mr. R. Nye (EPA) stated that there is no expiration date on the Prevention of Significant Deterioration (PSD) permit EPA issued to RL in 1980. Mr. Nye also stated that, since RL/WHC will be operating the facility control equipment required by the permit and have emissions below the emission limits in the permit, the permit is still in force. Mr. Nye indicated that a letter will probably be sent from EPA stating that RL/WHC's proposal is within the jurisdiction of the PSD permit. Mr. G. LeBaron (WHC) inquired about the PSD permit covering radionuclide emissions. Mr. Nye responded that the PSD permit references the original permit application and that the permit application would suffice for emission limits in the PSD permit. Mr. Nye stated that EPA did not delegate authority for EPA-issued PSD permits, and that if any modification were to be made to the Hanford Site PSD permit, it would be made by EPA, not Ecology.

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- **RCRA Permitting Requirements**

On August 13, 1993, EPA, Ecology, and DOH permitting representatives met to discuss regulatory issues impacting PUREX Plant deactivation. Drawing from these discussions, Mr. Duncan raised some questions regarding

- Storage of the RCRA hazardous waste within the facility,
- What is covered under the current Part A permit application (Part A) that has been submitted to EPA, and
- The nature of RL/WHC's concern regarding resubmitting the Part A.

Storage of Regulated Solutions

Mr. LeBaron responded to Mr. Duncan's questions by explaining that storage of potentially regulated solutions is occurring in a number of vessels not in the current Part A. Inclusion of each of these vessels in the Part A would require inclusion of the associated piping and secondary containment system for each vessel, also. RL/WHC is concerned about bringing the majority of the plant under interim status and the need to then bring the permitted systems into compliance with RCRA interim status requirements, including secondary containment and tank integrity assessments. Upgrades and assessments involve substantial costs and time. Rather than include the majority of the plant in the Part A, RL/WHC's proposes to expeditiously remove the solutions from the building and minimize the volume of the solutions prior to removal. The work would be performed under the jurisdiction of the Tri-Party Agreement (TPA) milestones.

Mr. Duncan referred to RL/WHC's draft letter dated August 12, 1993, which indicates the Part A will be modified to include sugar denitration and concentration activities that will occur in interim status tanks. This proposal was confirmed. Mr. LeBaron explained that RL/WHC's concern is with storage and treatment of solutions contained in other tanks that are not included in the Part A. Mr. Duncan asked how soon RL/WHC proposed to transfer the solutions from the plant, and Mr. LeBaron stated that the timing of the transfers is dependent on the length of time that would be required to receive approval to start the activities and to conduct the activities.

Mr. M. Jaraysi (Ecology) suggested that, generally, if a revised Part A is submitted in conjunction with a compliance plan, then interim status can usually be granted for the proposed modification or expansion, even at non-compliant facilities. Mr. Jaraysi added that at PUREX, closure of the facility might constitute bringing it into compliance. Mr. LeBaron stated that RL/WHC are proposing TPA milestones in place of a compliance plan and that, since the facility will be closed, it seems pointless to modify the Part A.

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Treatment by Co-precipitation

Mr. Tebb asked if co-precipitation has been identified by RL/WHC as the preferred method for minimizing solutions in Tanks D5 and E6, and Mr. R. Knight (WHC) indicated that a final decision has not been made. Mr. Tebb stated that amending the Part A to incorporate the sugar denitration process appears to be a straightforward approach, but that Ecology and EPA are hesitant to approve a specific regulatory approach for the proposed co-precipitation treatment process. Mr. Tebb requested that when RL/WHC identify the preferred option or options for treatment, that the language included in any milestone is specific and that the tanks and systems are identified so that they can all be managed together. Mr. L. Romine (RL) stated that RL and Headquarters have not agreed on how to proceed with the proposed TPA milestones or on the specific wording of the milestones. Mr. R. Martinez (DOE-HQ) stated that a project management plan that includes the proposed co-precipitation process is being drafted, and he inquired about the possibility of using it as a closure plan. Mr. Tebb acknowledged that preparing a project management plan is a worthwhile endeavor, but that Ecology could not immediately give approval based on a proposed process to which RL and Headquarters are not fully committed.

Mr. LeBaron inquired about Ecology's reluctance regarding co-precipitation. Mr. Tebb explained that he had no objection to the process of co-precipitation, but sensed the parties may expend a lot of time and effort negotiating regulatory approval of this particular method, then decide on another method at a later time. Mr. Tebb suggested that the parties first decide on a method, then proceed to obtain the necessary permitting and approvals. Ms. Robertson restated RL/WHC's request for regulatory approval on the basic approach to modify the Part A for activities to be conducted in interim status systems, and to establish TPA milestones for the remaining activities. Mr. Tebb reiterated his need for RL/WHC commitment to specific activities.

Mr. Duncan posed several questions in a continued attempt to understand RL/WHC's reluctance to modify the Part A to include co-precipitation, and then suggested that RL/WHC write up a description of the proposed co-precipitation process and send it to EPA and Ecology. Mr. Duncan indicated that it should be a fairly simple procedure to add a description of the treatment process to the Part A. Ms. Robertson stated that RL/WHC is concerned that co-precipitation would constitute an expansion of treatment capacity that would require RL/WHC to go through the Notice of Intent (NOI) process, which would involve considerable time delays. Mr. Jaraysi confirmed that Ecology would likely require an NOI and public involvement. Mr. E. Smith (WHC) stated that while an NOI is normally prepared when adding new processes for ongoing waste management activities, the PUREX Plant is undergoing closure. Mr. Smith then inquired about the possibility of waiving the NOI, and a discussion ensued. However, no conclusions were reached.

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Mr. Jaraysi asked whether RL/WHC would be willing to modify the Part A for co-precipitation if the NOI process were waived. Mr. LeBaron indicated that RL/WHC would need to evaluate the impacts of including additional vessels, pipes, and secondary containment systems in the Part A, because the expansion would complicate final closure of PUREX. Mr. LeBaron requested that RL/WHC be allowed to meet the intent of the dangerous waste regulations by removing dangerous materials from the vessels and piping, without being subjected to the burden of administrative encumbrances. Mr. Smith pointed out that, while the proposed milestone requires flushing until the rinsate no longer exhibits dangerous waste characteristics, the dangerous waste regulations would also require flushing until no dangerous waste constituents are detected. This would require a more rigorous process be followed and more in-depth analyses be conducted. The proposed RL/WHC approach would likely generate less secondary waste (rinsate) and is more consistent with the requirements of DOE Orders for D&D activities than with the requirements of RCRA.

Mr. Duncan stated that another approach might be to consider PUREX deactivation as a voluntary closure activity; RL could initiate closure activities on a voluntary basis. Mr. Duncan suggested that RL could combine the project management plan and the RCRA closure plan for PUREX, or provide the project management plan as an addendum.

Storage of Regulated Solutions (revisited)

The conversation returned to storage of solutions in non-interim status tanks. Mr. LeBaron indicated that about a dozen tanks not included in the Part A are being used at PUREX for storage of regulated solutions. Mr. LeBaron stated that much of the stored solution would have been flushed from the plant at the end of the stabilization run, if it had been known that the plant would not run again. Instead, however, the solutions were kept on hand for use during expected future operations. The solutions were not considered to be waste until PUREX shut-down orders were issued. Mr. LeBaron reiterated that following normal RCRA permitting and closure requirements for tanks containing these solutions would only delay removal of the solutions from the tanks. Mr. Duncan agreed that the timing of the removal would be a major concern. Mr. Bowman added that modifying the Part A to include the storage tanks would be an expansion of the facility that would require implementation of the NOI process.

Mr. Duncan noted that PUREX is apparently in violation of RCRA storage requirements. Mr. Duncan proposed as another alternative that Ecology could issue an order to DOE requiring that the solutions be removed from the plant by a specific date. Ecology could attach a compliance schedule to the order. Mr. Duncan pointed out that a regulatory order would eliminate much of the paperwork that RL/WHC are so concerned about. Mr. Krekel stated that RL would like to use PUREX to set a precedent for closure of

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other facilities at the Hanford Site and would prefer not to receive a regulatory order to remove material from PUREX.

GENERAL TOPICS

- **Initial NEPA Determination**

  In response to questions from Mr. Tebb regarding activities that might delay PUREX deactivation, Ms. Robertson provided a brief update on the impact of NEPA. Results of initial screenings of some of the proposed deactivation activities indicate that most of the activities may proceed as interim actions and will not be delayed by NEPA. One of the activities that could be delayed involves the transfer of spent fuel from PUREX to the K-Basins; the screening indicated that this activity can not proceed until additional NEPA is performed. Mr. Tebb requested that RL provide official correspondence to document the eventual outcome of the NEPA screenings.

  Mr. Tebb requested additional official correspondence from RL/WHC to Ecology management reflecting the approach RL/WHC plans to take regarding PUREX deactivation, and to identify a source of funding to support an Ecology full-time equivalent (FTE) for the PUREX project. Mr. Tebb also requested that RL/WHC draft and provide Ecology with two deactivation schedules reflecting worst-case and best-case scenarios.

- **Action Items**

  Action item 7-13-93:5: Ecology (T. Tebb) will review the Part A. This action item is ongoing.
  Action item 7-26-93:1: RL/WHC will provide a working schedule to Ecology and EPA prior to their August 11, 1992 meeting. This action item is open.
  Action item 7-26-93:2: Ecology and EPA will outline their position resulting from the August 11, 1993 meeting. This action was completed.

  Mr. Jaraysi requested RL/WHC give a presentation to EPA, Ecology (Bob King), and the Department of Health regarding the planned deactivation processes. Mr. Jaraysi stated that Cindy Grant (DOH) had requested an overview of the modifications to the HVAC system. Mr. Tebb requested official correspondence from RL/WHC to Ecology management reflecting the approach RL/WHC plans to take regarding PUREX deactivation, and to identify a source of funding to support an Ecology FTE for the PUREX project.

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Attachment 3

PUREX DEACTIVATION MEETING
Federal Building, Room 784B
Richland, Washington

August 16, 1993
1:00 p.m. - 3:00 p.m.

Attendance List

Name	Organization	Phone #
Joan K. Bartz	MACTEC	372-2008
Ravi K. Bhatia	WHC	372-2720
Roger C. Bowman	WHC	376-4876
Dan L. Duncan	EPA	(206)553-6693
Moses N. Jaraysi	Ecology	736-3016
J. Roger Knight	WHC	372-2252
Kathleen E. Knox	WHC	372-3596
Randall N. Krekel	RL	376-4264
Jake R. Laws	WHC	376-7508
Gregory J. LeBaron	WHC	373-1792
Rick Martinez	DOE-HQ	(202)
Ray Nye	EPA	(206)553-4226
Sue M. Price	WHC	376-1653
Julie R. Robertson	WHC	376-8162
Larry D. Romine	RL	376-4747
Edward H. Smith	WHC	376-0234
G. Thomas Tebb	Ecology	736-3020
Jack L. Waite	WHC	372-1772

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Attachment 4

PUREX DEACTIVATION MEETING
Federal Building, Room 784B
Richland, Washington

August 16, 1993
1:00 p.m. - 3:00 p.m.

Action Items

Action Item	Description
07-13-93:5	Ecology will review the Part A. ACTION: T. Tebb (Ecology) OPEN
07-26-93:1	RL/WHC will provide a working schedule to EPA and Ecology prior to their August 11, 1993 meeting. OPEN
07-26-93:2	Ecology and EPA will outline their position resulting from the August 11, 1993 meeting at the next PUREX deactivation meeting scheduled August 16, 1993. CLOSED
07-26-93:3	Mr. Tebb will identify what kind of flexibility Ecology might have to abbreviate the NOI process. OPEN
08-16-93:1	Mr. Jaraysi requested RL/WHC give a presentation to EPA, Ecology (Bob King), and the Department of Health regarding the planned processes. Mr. Jaraysi stated that Cindy Grant had requested an overview of the modifications to the HVAC system. OPEN
08-16-93:2	RL/WHC will prepare draft best- and worst-case schedules for Ecology to evaluate. OPEN
08-16-93:3	Mr. Tebb requested official correspondence from RL/WHC to Ecology management reflecting the approach RL/WHC plans to take regarding PUREX deactivation, and to identify a source of funding to support an Ecology FTE for the PUREX project. OPEN

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Distribution:

B. A. Austin	WHC	B2-35
R. A. Bhatia	WHC	H6-23
R. V. Bowersock	WHC	S6-19
R. C. Bowman	WHC	H6-24
G. J. Bracken	RL	R3-72
W. R. Brown	WHC	H6-30
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
D. J. Carrell	WHC	H6-22
C. E. Clark	RL	A5-15
M. W. Cline	WHC	H6-21
A. W. Conklin	DOH	
J. R. Cook	MACTEC	B1-42
D. L. Duncan	EPA Region 10	HW-106
B. G. Erlandson	WHC	H6-20
R. E. Gerton	RL	R3-72
D. G. Hamrick	WHC	S6-15
D. G. Harlow	WHC	S6-17
M. Jaraysi	Ecology, Kennewick	
R. C. King	Ecology, Lacey	
K. E. Knox	WHC	H6-24
R. N. Krekel	RL	A5-15
R. J. Landon	WHC	H6-21
G. J. LeBaron	WHC	S6-19
J. J. Luke	WHC	H6-25
K. L. Lundborg	WHC	S6-19
J. E. Mecca	RL	R3-81
T. M. Michelena	Ecology, Lacey	
W. A. Peiffer	WHC	S6-18
S. M. Price	WHC	H6-23
J. E. Rasmussen	RL	A5-15
J. R. Robertson	WHC	H6-30
L. D. Romine	RL	R3-81
F. A. Ruck III	WHC	H6-23
E. H. Smith	WHC	H6-22
S. D. Stites	RL	A5-15
G. T. Tebb	Ecology, Kennewick	
D. Washenfelder	WHC	S6-18
J. R. Williams Jr	WHC	H6-24
B. D. Williamson	WHC	B3-15

ADMINISTRATIVE RECORD: PUREX, TS-2-6 [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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