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Meeting Minutes Transmittal - Approval

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held October 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 Mattlin Date: 11/14/96
Ellen M. Mattlin, Project Manager, RL

Jeanne J. Wallace for Date: 11/14/96
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

300 Area WATS, Contractor Concurrence

Scott N. Luke Date: 11/14/96
Scott N. Luke, Contractor Representative, RFSH

John L. Metcalf for Date: 11-14-96
John L. Metcalf, Contractor Representative, BWHC

F. A. Ruck Date: 11/14/96
F. A. Ruck, Contractor Representative, FDH

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

Attachment 1

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
2440 Stevens Center Building, Room 2200
Richland, Washington

Meeting Held October 10, 1996
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Agenda

1. Approval of Past PMM Minutes
2. Status PMM Action Items
None
3. Closure Activities
 - Phase 1 DIP (WHC-SD-ENV-AP-001, Rev 0)
 - DIP NOD Response Table
 - Dip revision
 - Phase 1 closure activities - 313 Building
 - Awaiting air permit to access system
 - Results of PCB sample reanalysis
 - Closure Plan (DOE/RL-90-11, Rev. 1)
 - NODs received by Ecology
 - Closure Plan/NOD approval schedule
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 2200
Richland, Washington

Meeting Held October 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 September 10, 1996 PMM were signed by the RL and Ecology Project Managers.

2. Status PMM Action Items

None

3. Closure Activities

• Phase 1 Decontamination and Inspection Plan (WHC-SD-ENV-AP-001, Rev 0

- DIP NOD Response Table. Ecology identified concerns with the following responses from NOD Response Table that was electronically transmitted to Ecology on 9/9/96.

NODs #4 (designation). The response needed to more clearly identify accessibility criteria regarding waste designation.

RFSH (Luke) stated that the DIP would address waste and debris designation by: 1) identify the waste designation process and logic; 2) referencing the *313 Building Sludge Recovery Waste Characterization Report* that identifies WATS-specific designation criteria (i.e., identifies hazardous residues and residue quantities necessary to designate the debris matrix); and, 3) referencing waste certification summaries (WCS) that mandate how particular waste must be packaged and transported to meet the receiving facility waste acceptance criteria. The DIP NOD Response Table will be revised to state that the above information will be added to the DIP. Ecology indicated that its approval of this DIP NOD response would require DIP text verbiage and the referenced report. RFSH indicated that the characterization report is not yet complete but will be made available to Ecology, along with revised DIP text, as soon as it is completed. Further, the waste designation results can be made a portion of the Phase 1 closure evaluation report that will be generated to document and

evaluate closure activities with respect to meeting clean closure requirements.

NOD #6 (page change). This DIP NOD response will be clarified to more clearly state that the DIP will be revised to delete the EII reference and the word "approved".

NOD #7. Ecology's primary concern was that the waste removed for disposal is packaged and transport in accordance with the waste acceptance criteria for the receiving facility. The discussion and resolution to NOD #4 sufficiently addressed this concern by ensuring that use of WCSs that accompany waste and ensure its proper management will be described in the DIP.

- **DIP Revision.** RFSH (S.N. Luke) indicated that DIP approval by Ecology was dependent upon providing Ecology with the DIP text changes proposed in the DIP NOD response table. Although Ecology had not concurred with all NOD Response Table responses, RFSH would proceed with document revision based on the current Ecology accepted responses and on an understanding of Ecology intent gained from today's and previous discussions. Once revised, the draft document would be presented to the facility to highlight the document changes, then to RL for concurrence, and then to Ecology for approval. This process is intended to expedite issuance of DIP Rev 0 as an already approved document. The Ecology and RL unit managers agreed that 'walking it through' the system could speed up approval. Each indicated that they would be available for the presentation. RFSH (Luke) indicated that with facility technical support, the revised DIP could get back to the facility during the week of October 14, 1996 and possibly to Ecology during the week of October 21, 1996.

• **Phase 1 Closure Activities - 313 Building**

- **Awaiting air permit to access system.** BWHC (Mr. I.L. Metcalf) indicated that the air permit application that will allow breaking into the piping system was sent to the State of Washington, Department of Health (WDOH) by RL on 8/27/96. The WDOH has 90 days to approve the application. Although it has been approved by the U. S. Environmental Protection Agency, RL is still awaiting approval by the DOH.

- **Results of PCB sample reanalysis.** The results of Pump 8 duplicate sample reanalysis came back at 4.7 ppm for PCBs, which indicates nonregulated for PCBs. This result confirms that no equipment oils or areas tested for PCBs are regulated for PCBs.

• **Closure Plan (DOE/RL-90-11, Rev. 1)**

- **NODs received from Ecology.** Ecology (Mr. T. A. Wooley) indicated that a draft of NODs had been electronically transmitted on October 2, 1996. RL (Ms E. M. Mattlin) acknowledged their receipt.

- **Closure Plan/NOD approval schedule.** RFSH (Luke) indicated that a schedule for closure plan approval that fits with Modification C of the RCRA Permit was being generated. The schedule is aimed at providing an

'advance' (basically approved) copy of the closure plan to Ecology in April 1997 and an 'approved' copy of the closure plan (the same plan unless changes are requested by Ecology) to Ecology June, 1997. RFSH indicated that the schedule will be transmitted to the facility and to RL for approval and should be available to Ecology during the week of October 14, 1996.

5. New Business

None.

6. Schedule Next Workshop Meeting Date

The next workshop would be a text familiarization session between RFSH and Ecology in Kennewick to walk Ecology through the revised DIP text. A tentative date of 10/24/96 was set for this presentation.

7. Schedule Next PMM Date

The next Project Managers Meeting was scheduled for November 14, 1996, tentatively for 2:00.

Distribution:

R. C. Bowman	RFSH	H6-24
M. R. Hahn	RL	R3-79
S. N. Luke	RFSH	H6-24
E. M. Mattlin	RL	A5-15
I. L. Metcalf	BWHC	L6-26
J. A. Remaize	BWHC	L6-26
J. W. Rich	BWHC	L6-26
F. A. Ruck	FDH	H6-22
J. M. Steffen	BWHC	H6-23
J. J. Wallace	Ecology	B5-18
T. A. Wooley	Ecology	B5-18
Field File Custodian	RFSH	H6-08
RCRA File	RFSH	H6-23

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

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