

**START**

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Meeting Minutes Transmittal

PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington

September 20, 1995  
2:00 p.m. to 3:30 p.m.

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

*Charles R. Delannoy* Date: 10/18/95  
Charles R. Delannoy, Unit Manager, RL

Not Present Date: \_\_\_\_\_  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

*Jeanne J. Wallace* Date: 10/18/95  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

PNL Non-Operational Units, PNL Concurrence

*Michael H. Schlender* Date: 10/10/95  
Michael H. Schlender, Contractor Representative, PNL

Purpose: Discuss Closure 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
- Attachment 5 - Ecology List of Documents and Correspondence for Inclusion in the Administrative Record
- Attachment 6 - Description of Pit Tanks Use



Attachment 1

PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 Building, Mt. Hood Room  
Richland, Washington

September 20, 1995  
2:00 p.m. to 3:30 p.m.

Agenda

1. Approval of Past Meeting Minutes (Ecology/RL/PNL)
2. RL/PNL Procedural Closure Certification Package for the Thermal and Physical/Chemical Treatment Test Facilities (Ecology/RL/PNL)
  - Status and Submittal Schedule
  - Contents
  - Submittal Schedule
  - Lessons Learned
3. Procedural Closure of the Thermal and Physical/Chemical Treatment Test Facilities (Ecology/RL/PNL)
  - Administrative Record Requirements
  - Public Involvement
  - Part A Management
  - Ecology Compliance Inspection
  - CERCLA Past Practice Coordination
4. Procedural Closure of the Biological Treatment Test Facilities (Ecology/RL/PNL)
5. Clarification on July 14, 1995 RL Letter to Ecology: Initiation of Procedural Closure for Nonoperational TSD Units (Ecology)
6. General Discussion (Ecology/RL/PNL)
7. Status New Action Items (Ecology/RL/PNL)
8. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Proposed October 19 date
  - Proposed topics

## Attachment 2

PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 building, Mt. Rainier Room  
Richland, Washington

September 20, 1995  
2:00 p.m. to 3:30 p.m.

## Summary of Discussion and Commitments/Agreements

## 1. Approval of Past Meeting Minutes

The August 24, 1995 Unit Manager Meeting minutes were approved.

## 2. RL/PNL Procedural Closure Certification Package for the Thermal and Physical/Chemical Treatment Test Facilities

## ● Status and Submittal Schedule

Mr. M. Schlender (PNL) stated that the Thermal and Physical/Chemical Treatment Test Facilities certification package has been signed by Dr. B. Media (PNL) and the package is in RL review. Mr. R. Delannoy (RL) stated that the certification package will be presented to Mr. J. Wagner (RL) for signature this Friday (9-22-95). Mr. Delannoy indicated that the approved certification package will be hand delivered to Ecology next week. Ms. J. Wallace (Ecology) requested that PNL ensure the EPA is provided a copy of the certification package.

## ● Contents

Mr. Schlender provided Ms. Wallace a draft of the fundamental certification package without the attachments.

## ● Submittal Schedule

The certification package is targeted for submittal to Ecology the week of September 30th. C.R. Delannoy will hand carry it to Ecology.

## ● Lessons Learned

Mr. Delannoy stated that inspections for the Biological Treatment Facility should be performed in a series instead of concurrently. Ms. Wallace requested that the Ecology unit manager always be copied when information is transmitted. The parties agreed to defer discussion until the "kickoff" meeting for the Biological Treatment Unit on October 4, 1995.

### 3. Procedural Closure of the Thermal and Physical/Chemical Treatment Test Facilities

- **Administrative Record Requirements**

Ms. Wallace provided a list of documents and correspondence to include in the Administrative Record (Attachment 5). Ms. Wallace also requested that all of the 325 Hazardous Waste Treatment Unit (HWTU) Unit Manager Meeting minutes which contain reference to procedural closure be included in the Administrative Record for the Thermal and Physical/Chemical Treatment Test Facilities. Mr. Day took an action to review the Administrative Record for the Thermal and Physical/Chemical Treatment Test Facilities, and determine the first 325 HWTU Unit Manager Meeting in which procedural closure was discussed.

- **Public Involvement**

Ms. Wallace stated that Section 6.3.3 of the Tri-Party Agreement (TPA) calls for public involvement for procedural closure, and that a focus sheet discussing the actions that will be taken should be prepared. Mr. H. Tilden (PNL) stated that he discussed the focus sheet with the TPA group, and it was suggested that the information be placed in the Hanford Update (bimonthly newsletter) as an alternative to the cost of preparing and mailing a focus sheet. Ms. Wallace responded that a focus sheet would probably be requested by Ecology.

- **Part A Management**

Ms. Wallace indicated that the Part A's for procedural closure would be managed the same as the closure Part A's. Following closure of a unit, the Part A is stamped "closed" and the updated Part A is entered into the Resource, Conservation and Recovery System (RCRIS) by the EPA.

- **Ecology Compliance Inspection**

Ms. Wallace addressed several issues with regard to Ms. L. Russell's (Ecology) inspection report. The report states that it is inappropriate to procedurally close the in situ vitrification (ISV) site without an investigation in an effort to assess the environmental contamination. Ms. Wallace stated that there shouldn't be a problem addressing the ISV site issues under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Ms. Wallace stated that she apprised EPA and Ecology that the ISV site will be deferred to CERCLA, and she plans to turn over documentation to EPA and Ecology to facilitate incorporation of the ISV site as part of the CERCLA 300-FF-2 Operable Unit work plan. Mr. Delannoy and Ms. A. Barnard (RL) will be the RL contacts and Mr. Schlender will be the PNL contact for providing information.

The next issue Ms. Wallace addressed was the pit tanks in the 324 Building. Mr. Schlender stated that he is in the process of obtaining waste management records for the pit tanks. Mr. Schlender also noted that PNL provided Ecology with a detailed response on the pit tanks, which indicates that the tanks are not greater than 90-day accumulation tanks and also provides a status of the tanks. Ms. Wallace indicated she had not received a copy of the detailed response. At this point Mr. Schlender provided a copy to Ms. Wallace, and gave a brief explanation how the pit tanks are used. Ms. Wallace requested an electronic message of Mr. Schlender's brief explanation of the pit tanks, and that it also be included in the meeting minutes (Attachment 6).

Ms. Wallace referred to the section in the report regarding past practices at the ISV site and inconsistent statements associated with ISV testing. Mr. Schlender explained the intent of the internal certifications were to identify activities conducted during the period of each individuals involvement. Mr. Luey did not join PNL until around 1990 therefore he would not have knowledge of activities conducted prior to this date.

Ms. Wallace requested clarification regarding a review of PNL staff certification forms which revealed that treatment activities had occurred at the Process Development Laboratory (PDL). Mr. H. Tilden (PNL) responded that the PDL was not considered part of the Hanford Facility and was not covered by the EPA identification number assigned to Hanford. Mr. Schlender added that the activity would have been covered under the treatability studies.

- CERCLA Past Practice Coordination

This topic was covered in the Ecology compliance inspection discussion.

#### 4. Procedural Closure of the Biological Treatment Test Facilities

Mr. Schlender stated that the RL/PNL letter to Ecology requesting procedural closure of the Thermal and Physical/Chemical facilities included a request for procedural closure of the Biological Treatment Test Facilities. Ms. Wallace acknowledged the letter, but she requested a separate letter to Ecology for procedural closure of the Biological Treatment Test Facilities. Ecology, RL and PNL set an initial meeting date for the Biological Treatment Test Facilities on October 4, 1995.

#### 5. Clarification on July 14, 1995 RL Letter to Ecology: Initiation of Procedural Closure for Nonoperational TSD Units

Ms. Wallace had no comment regarding the letter, and this topic was closed.

#### 6. General Discussion

Ms. Wallace expressed concern regarding the last paragraph in the change packages for the Physical/Chemical and Thermal Treatment Test Facilities. The text states that permitted waste management activities occurred in facilities covered by the current Part A permit application, Form 3, and that a closure plan will be prepared for those portions of the facility by September 1995.

Ecology, RL and PNL agreed to draft a paragraph stating that review has confirmed no permitted activities took place, and the REC high-level vault tanks are being managed under Milestone M-89. The paragraph will be included with the Thermal and Physical/Chemical Treatment Test Facilities certification package.

Mr. Tilden stated that the nondestructive examination (NDE) for the 325 slab tanks was completed 9-15-95. The data collected on the NDE revealed no internal corrosion, and the preliminary assessment is that the tanks are fit for use. The subcontractor is preparing the integrity assessment report. A copy of the report will be transmitted to Ecology. The milestone date for the final report is the end of December 1995.

#### **7. Status New Action Items**

One action item was generated for PNL to review the Administrative Record for the Thermal and Physical/Chemical Treatment Test Facilities, and determine the first 325 HWTU Unit Manager Meeting in which procedural closure was discussed.

#### **8. Next Unit Managers Meeting**

- **Proposed October 19 Date**

The next Unit Managers Meeting was scheduled for October 18, 1995. A Unit Managers Meeting for the 324 Unit will be included.

- **Proposed Topics**

Status of Administrative Record Review for the Thermal and Physical/Chemical Treatment Test Facilities.

Status of Procedural Closure Requests Review for the Thermal and Physical/Chemical Treatment Test Facilities.

Schedule and Status of PNL Internal Procedural Closure Package for Biological Treatment Test Facilities.

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**Attachment 3**

**PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington**

**September 20, 1995  
2:00 p.m. to 3:30 p.m.**

**Attendance List**



Attachment 4

PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington

September 20, 1995  
2:00 p.m. to 3:30 p.m.

Action Items

Action Item #

Description

06-29-95:1

Mr. B. Day (PNL) will provide Ms. J. Wallace (Ecology) a formal request for procedural withdrawal of the five nonoperational units. A schedule for the procedural withdrawals (meeting TPA milestones) will be included.  
ACTION: B. Day and M. Schlender (PNL)

CLOSED

09-20-95

Mr. B. Day (PNL) will review and update the Administrative Record for the Thermal and Physical/Chemical Treatment Test Facilities, and determine the first 325 HWTU Unit Manager Meeting in which procedural closure was discussed  
ACTION: B. Day

OPEN

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Attachment 5

PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington

September 20, 1995  
2:00 p.m. to 3:30 p.m.

Ecology List of Documents and Correspondence for Inclusion in the  
Administrative Record

AK

MM TW at 9/20/89  
P/W/ 101-CP 44MM

August 17, 1989 R. Stanley's letter to  
12att, Lerch, Chikalla: "Part A w/  
drawal petition"

June 22, 1989 12att, Chikalla to  
T. Husseman: withdrawal of Pt A & B  
Permit Application (M M-20-45)

10/11/89 Chikalla letter to 12att  
"supplemental information Re Pt A  
withdrawal petitions"

June 22, 1989 12att, Lerch to  
T. Husseman: withdrawal of Pt A & B  
applications (M-20-45)

5/18/94 J. Wallace to J. Bauer  
Hanford Facility Dangerous Waste Permit  
consolidation of 325 HWTU & P/C TT A  
RCRA Pt A & B Permit Apps.

11/10/94 R Holt -> R Stanley & Doug Shen  
wood: Han Fac Agreement & Consent Order A  
control form M-20-94-03: rev to Interim  
ms M-20-42, 43 & 44 change

compliance Rpt - Ecology Action  
cc: mails L m schleuder

9/11/95 letter  
9/11/95 letter  
P/C

P/S

T/T

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**Attachment 6**

**PNL NON-OPERATIONAL UNITS  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington**

**September 20, 1995  
2:00 p.m. to 3:30 p.m.**

**Description of Pit Tanks Use**

HAND DELIVERED TO Ecology: L. Russell  
J. Wallace

RE: REQUESTED INFORMATION CONCERNING PROCEDURAL CLOSURE OF  
PHYSICAL / CHEMICAL AND THERMAL TREATMENT PART A  
APPLICATIONS

8/9/95

KUTS

Provided below are written responses to questions/information requested by Ms. Laura Russell during an Ecology field inspection conducted August 16, 1995 and during the out briefing for the inspection August 18, 1995.

Ecology Request - August 18, 1995 (Based on electronic mail message received 8/18/95 from L. Russell, WDOE)

- (1) *Additional information regarding the ISV testing as per the 19 April 1990 letter from Energy to Ecology. The April 19, 1990 letter states two test to be performed: a pilot-scale test on a small tank and a large-scale test on a larger tank. The pilot-scale test was scheduled for April/May 1990 and the large-scale test for September 1990. Were the two tests conducted? All documentation I have indicates the September 1990 was the "pilot-scale" test. Please clarify. Also, the April 19, 1990 letter states 2500 liters of process scrub solution and 4 cubic meters of material were expected to be generated and classified as hazardous wastes. Where (were) these wastes generated? From which test? What happened to the wastes?*

**Response:** There were two ISV tests that were conducted in the 300 W Area as stated in the April 19, 1990 letter to Ecology. The first test was a "pilot-scale" test performed with waste simulant during September 1990. The second test was performed as a large-scale ISV test during April 1991. The second test used a larger tank (15' diameter) filled with pumice and contained no simulant. Process scrub and decon solutions were generated from the pilot-scale test. These wastes were sent to a permitted TSDF (305B). Copies of logbook entries, waste management requests, and shipping documents resulting from this activity (decon, waste handling) have been provided as requested in Attachment A.

Ecology Request - August 23, 1995 (Based on electronic mail message received 8/23/95 from L. Russell, WDOE)

- (1) *What happened to the equipment used in the large scale in-situ test at the 116-B-6-1 Crib?*

**Response:** The ISV equipment used for the large-scale test was decontaminated prior to release from the 100 area and shipped to the 300 W Area. PNL staff involved with the 100 Area test have verified that the large-scale ISV system was cleaned out (including scrub solution removed, solids from the scrub tanks removed, and HEPA filters removed like the pilot scale system). An inspection of records and project files did not produce analytical data demonstrating the performance of the decontamination procedures. Analytical data is expected in the next two months from pre-test analysis of the ISV off-gas treatment train and associated equipment used in the 1991 test. This equipment is currently in use at Oak Ridge, TN.

- (2) *Are additional treatability tests planned using the plasma-arc pyrolysis equipment (located in the EDL highbay)?*

**Response:** Additional treatability testing activity is planned for the plasma-arc pyrolysis equipment located in the 324 Building highbay. This work is expected to continue in the 324 Building.

- (3) *Pat Weaver, said Langdon Holton has information on upcoming treatability tests for the SST sludge to be performed in the C-Cell of the REC. Can you see what is available on this subject?*

**Response:** Included in Attachment B is a copy of the "Functions and Requirements for the Sludge Pretreatment Demonstration", Rev 1, dated October 1994. The work described in this document is intended for C-Cell of the REC.

- (4) *Mention was made of documentation PNL has regarding the decontamination of the equipment used to treat simulated*

*carbon tet/nitrate samples (formally located in building 324), first floor of biological treatment test facility, now located outside of the building awaiting disposition).*

**Response:** Prior to transfer out of the building, tap water (approx. 20 gallons) from the Bio-Reactor system clarifier was autoclaved and transferred to the process sewer. The water from the clarifier was tap water from the 324 Building and used to demonstrate the processing unit functionality. No chemicals were added to the clarifier during the standby period prior to transfer. Project records indicate the simulated groundwater (SGW) used in the Bio-Reactor system contained sodium metasilicate, carbonate, sulfate, and potassium hydroxide with a near neutral pH. Other SGWs contained potassium phosphate and sodium hydroxide (at near neutral pH). Logbook entries are provided in Attachment C showing the composition of the SGWs. Approximately 100 gallons of SGW was released to the process sewer following review and concurrence by PNL Environmental Compliance. Sand contained in a pan to catch any nutrient solutions spilled during the filling of carboys was analyzed and disposed of in accordance with PNL waste management procedures (see attached CDRR records for the sand). The other surfaces of the Bio-Reactor system were washed with water prior to removal from the 324 Building. The system was then dismantled and moved outside the 324 Building.

- (5) *What is the status of the tanks in "pit tank" area (located next to rooms 22A/B in the basement of 324 building)? What is in the tanks? Is the effluent from filtrate tanks used in waste vit processes in EDL? What happens to the effluent in these holding tanks?*

✕ **Response:** The tanks function as condensate collection tanks. The condensate is generated from wet scrubbers that are used to treat gaseous effluent from vitrification equipment. The scrubbers remove the water vapor, large particulate, and depending on scrubbing efficiency, some of the acid gases and decomposition gases. The vitrification off gas is comprised of air, water vapor, entrained particulate, aerosol particles, acid

gases, and decomposition gases such as NO<sub>x</sub>, CO<sub>x</sub>, and SO<sub>x</sub>. The condensate is recirculated as a scrubbing liquid when a ejector venturi scrubber (tied to Tk 20) or packed column (tied to Tk 16) are operated. The condensate can subsequently be processed through a thermosyphon evaporator or hydropulse particulate filter if evaluation of either of these process steps is part of the campaign. The condensate is either used as process makeup water for the next campaign, incrementally disposed of during the campaign (following analysis), or if the test is of short duration it is held until the conclusion of the test and disposed of after sample analysis is complete.

If the condensate meets the requirements for discharge directly to the 300 area waste effluent treatment facility, 324 Building management will remove the lockout from the drain and approve its discharge. If it exceeds the requirements it is managed as waste and disposed of through the 305B facility.

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
- Attachment 5 - Ecology List of Documents and Correspondence for Inclusion in  
the Administrative Record
- Attachment 6 - Description of Pit Tanks Use

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ADMINISTRATIVE RECORD: PNL Non-Operational Units,  
[Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to B. J. Day (P7-79), (509) 376-3835