

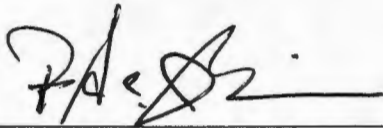
Meeting Minutes Transmittal

LLBG Project Meeting  
Ecology Interface Meeting  
2704HV/Rm. G229/600 Area  
Hanford, Washington  
August 30, 2001

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OCT 03 2001  
EDMC

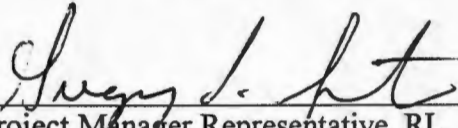
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The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project/Ecology Interface Meeting.



Fred Jamison, Project Manager, Ecology

Date: 09-27-01



Project Manager Representative, RL

Date: 09-27-01



Project Manager Representative, FH WMP

Date: 09-27-01

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OCT 03 2001  
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## LLBG PROJECT MEETING MINUTES

Project Managers Meeting  
2704HV/G229/600 Area  
Hanford, Washington

August 30, 2001

- I. Approval of the July 26, 2001 LLBG Project Meeting Minutes (Ecology/DOE-RL/FH)
- II. Operational Status
  - Non-ATG Waste Accepted at the LLBG in July  
TRU                    158 cubic feet                    17 drum eqs
  - No Waste Shipped from ATG to Trench 34 in July
  - No Reactor Compartments received in July
- III. Project Specific Issues
  - A. Issue Paper
    1. Greg Sinton (DOE-RL) reported that work is continuing to resolve some issues. Paul Crane (FH) wanted to know what the level of detail and formality was needed.
    2. Andrea Prignano (FH) announced that workshops on the boundary issue were scheduled for the following week.
    3. Matt Mills (Ecology) asked what the intent was for shrinking the boundaries. Greg Sinton (DOE-RL) stated that public perception of a larger boundary might lead the public to believe we have more capacity for disposal than we really have. In addition, the public might believe Ecology has authority to regulate low-level waste disposal.
    4. Dan Saueressig (FH) submitted a draft paper that could be the basis for workshop discussions.
  - B. Ecology review of Draft Part B submitted June 2000
    1. Dan Saueressig (FH) provided a Draft schedule for Mod H that includes the dates for Ecology review of the Part B. This is the same schedule that was provided at last month's meeting.
    2. Matt Mills (Ecology) indicated that his review schedule is off by about 2 weeks.
  - C. Schedule for WAP workshops and draft submittal
    1. Jeannette Hyatt (FH) reported that Cindy Girres (DFS) is on board to prepare the WAP and is currently putting together a schedule.
- IV. Status of Action Items
  - A. SWSD-99-003 (565) remains open.
  - B. LLBG-00-005 (568) remains open.
  - C. LLBG-00-007 (570) remains open. The action is to provide a Part A and B historical overview presentation to Ecology. This action will remain open until the completion of the initial workshop that is scheduled for September 10, 2001
  - D. LLBG-01-01 (754) was closed.
  - E. LLBG-01-02 (755) was closed.
  - F. LLBG-01-03 (756) was closed

**V. New Action Items**

- A. Andrea Prignano (FH) took the action to schedule workshops on the LLBG boundary issues.**

**VI. Next Project Meeting**

- A. Next project meeting is tentatively scheduled for September 27, 2001.**

**TSD unit Boundaries for the Mixed Waste Disposal Units**  
**Draft 8/30/01**

**Issue:**

How can shrinking the boundaries of the Mixed Waste Disposal Units (MWDU) provide protection to human health and the environment, allow transition to final status, and ensure compliance with TSD closure requirements while integrating activities with other waste sites within the 200 Area Plateau.

**Protection to human health and the environment:**

- Groundwater monitoring will be continued with existing waste management area monitoring system regardless of how the active portions are structured within in the Part B Permit Application
- Any future groundwater monitoring wells will be proposed through TPA milestone M-24 and prioritized with other activities on the Hanford Site.

**Allow transition to final status:**

- The Part A, Form 3 that will be contained in Chapter 1.0 of the Part B Permit application only needs to include the operating trenches and the future disposal areas. The MWDU operating trenches only include Trench 31, Trench 34, and Trench 94. Only compliant trenches will be permitted for final status operations.
- The green islands can be addressed within other chapters of the Part B Permit application (Chapter 5.0 Groundwater Monitoring and 11.0 Closure) and do not have to be contained in Chapter 1.0. This structure will ensure future mixed waste disposal occurs in trenches meeting minimum technology requirements (double liner, leachate collection).

**Ensure compliance with TSD closure requirements while integrating activities with other waste sites within the 200 Area Plateau:**

- All burial grounds are included in the 200-SW-2 Operable Unit of the TPA with Ecology being the lead regulatory agency.
- Draft A of the Remedial Investigation/Feasibility Study is scheduled for Ecology review June 2004.
- The characterization approach through the Record of Decision is well defined in the 200 Area Implementation Plan (DOE/RL-98-28), which has been approved by the regulators.
- Since low-level waste disposal is planned to continue for some time, the remediation phase (surface barrier construction) would occur over an extended period, and the 200-SW-2 remediation schedule would be updated as necessary.

**Background:**

1. Chapter 1.0 of the Part B Permit Application contains the Part A, Form 3 Permit Application and the revision history.
2. The "Active portions" of the MWDU as defined by WAC 173-303-040, include the three trenches (31, 34, and 94) and the "green islands." Green islands are mixed waste disposal locations intermixed with low-level waste disposal that occurred after August 19, 1987.
3. August 19, 1987 is the effective date of mixed waste regulation in Washington State.
4. There is precedent for having non-compliant areas addressed only in the closure section of a Part B permit application.
  - The T-8 tunnel waste in the 222-S laboratory is included in Chapter 11 (closure section) of the Part B, but is not included in the Part A, form 3. The T-8 tunnel waste is considered an active portion. (Reference A. Huckaby/Ecology letter 10/10/97)
5. There could develop a public perception under a larger boundary that there is a large area for waste acceptance; the appearance of a much greater potential mixed waste disposal capacity than is actually included and/or that Ecology is regulating low-level waste disposal.
  - Appearance that mixed waste other than reactor compartments in Trench 94 might be disposed in unlined trenches.

## DRAFT Modification H MWDU Part B Permit Application

ID	Task Name	Duration	Start	Finish	2002											
					May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr
1	<b>Part B Permit Application</b>	199 days	Thu 6/28/01	Tue 4/2/02	▶											
2	<b>1. Part A NOD Response Table</b>	25 days	Mon 7/23/01	Fri 8/24/01	▶											
3	FH/RL transmit NOD response table	1 day	Mon 7/23/01	Mon 7/23/01	▶											
4	Ecology Review	24 days	Tue 7/24/01	Fri 8/24/01	▶											
5	<b>2. Ecology review of MWDU Part B</b>	139 days	Thu 6/28/01	Tue 1/8/02	▶											
6	Ecology review (Ch. 6, 7, 8, 9, 10, 12, 13)	43 days	Thu 6/28/01	Mon 8/27/01	▶											
7	Ecology review (Ch. 2, 4, & 11) TBD	1 day			▶											
8	Ecology provide NOD comments	1 day	Wed 8/29/01	Wed 8/29/01	▶											
9	FH/RL prepare NOD response	33 days	Thu 8/30/01	Mon 10/15/01	▶											
10	Workshop to resolve NOD's 60 days	61 days	Tue 10/16/01	Tue 1/8/02	▶											
11	<b>3. Part A boundary resolution workshops</b>	22 days	Mon 8/27/01	Tue 9/25/01	▶											
12	<b>4. Groundwater monitoring plan</b>	135 days	Wed 9/26/01	Tue 4/2/02	▶											
13	PNNL prepare plan	35 days	Wed 9/26/01	Tue 11/13/01	▶											
14	FH/RL review	21 days	Wed 11/14/01	Wed 12/12/01	▶											
15	Submit to Ecology	1 day	Thu 12/13/01	Thu 12/13/01	▶											
16	Ecology review	35 days	Fri 12/14/01	Thu 1/31/02	▶											
17	Ecology provide NOD comments	1 day	Fri 2/1/02	Fri 2/1/02	▶											
18	FH/RL prepare NOD response	12 days	Mon 2/4/02	Tue 2/19/02	▶											
19	Workshops to resolve NODs	30 days	Wed 2/20/02	Tue 4/2/02	▶											
20	<b>5. Waste Analysis Plan</b>	164 days			▶											
21	Workshops (2/week)	30 days			▶											
22	Prepare WAP	33 days			▶											
23	FH/RL review	14 days			▶											
24	Incorporate comments	10 days			▶											
25	Submit WAP to Ecology for review	1 day			▶											
26	Ecology review	24 days			▶											
27	Ecology provide NOD comments	1 day			▶											
28	FH/RL prepare NOD response	16 days			▶											
29	Workshop to resolve NODs	35 days			▶											

Project: Waste Analysis Plan Schedul  
Date: Wed 7/25/01

Task



Progress



Milestone



Summary



