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Meeting Minutes Transmittal

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

October 18, 1995
3:00 p.m. to 4:00 p.m.

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

CR Delannoy Date: 11/8/95
Charles R. Delannoy, Unit Manager, RL

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

Jeanne J. Wallace Date: 11/8/95
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

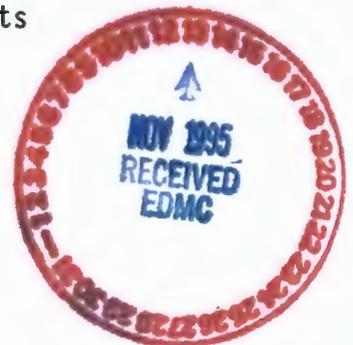
PNL Non-Operational Units, PNL Concurrence

Michael H. Schlender Date: 11/8/95
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 - Administrative Records Documentation List
- Attachment 6 - Summary of Lessons Learned Meeting



Attachment 1

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

October 18, 1995
3:00 p.m. to 4:00 p.m.

Agenda

1. Approval of Past Meeting Minutes (Ecology/RL/PNL)
2. Status of Administrative Record Review for the Thermal and Physical/Chemical Treatment Test Facilities (RL/PNL)
3. Status of Procedural Closure Requests Review for the Thermal and Physical/Chemical Treatment Test Facilities (Ecology)
4. Schedule and Status of PNL Internal Procedural Closure of the Biological Treatment Test Facilities (RL/PNL)
5. M-20-44 TPA Milestone Deliverable (Ecology/RL/PNL)
6. Lessons Learned on the Thermal and Physical/Chemical Treatment Test Facilities Procedural Closures (Ecology/RL/PNL)
7. Status Action Items (Ecology/RL/PNL)
 - New Action Items
 - Old Action Items

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. General Discussion (Ecology/RL/PNL)
9. Next Unit Managers Meeting (Ecology/RL/PNL)
 - Proposed November 8 date
 - Proposed topics

Attachment 2

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

October 18, 1995
3:00 p.m. to 4:00 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Meeting Minutes

The September 20, 1995 Unit Manager Meeting minutes were approved.

2. Status of Administrative Record Review for the Thermal and Physical/Chemical Treatment Unit Test Facilities (RL/PNL)

D. Lutter (PNL) compiled the information Ecology requested with the exception of Ecology's Compliance Report. Ecology's compliance report was not finalized. Ecology will submit the report for submittal in the Administrative Record. RL will transmit the current package to the Administrative Record during the week ending October 27th. The list of documents transmitted by RL is attached to this UMP minutes (Attachment 5).

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

Ecology has begun the review and has questions. J. Wallace (Ecology) cannot respond to the certifications until the issues are resolved. H. Tilden (PNL) suggested PNL track the comments or questions generated and try to resolve them in a format similar to a Notice of Deficiency table to make sure Ecology gets all the information needed and it's committed to in writing. J. Wallace agreed to submit comments/questions as she reviews the certification package and then at completion of the review she will formalize a list for generation of a NOD table type document. D. Lutter will maintain a central list.

4. Schedule and status of PNL internal Procedural Closure of the Biological Treatment Test Facilities

H. Tilden (PNL) indicated that it is an ongoing process. Mr. Schlender prepared a bar graph which shows the schedule for the preparation of the document with an end of November date for submittal to Ecology. An informal meeting was held October 4th to discuss the process. Mr. C. Delannoy (RL) provided a summary of that meeting for attachment to this UMP minutes (Attachment 6).

H. Tilden (PNL) stated the PNL internal certification packages were distributed and were due back October 19th. One issue came up: there is a demonstration site being conducted withing a CERCLA operable unit near T Plant. It is assumed to be remediation of groundwater. This may be a potential issue. J. Wallace will continue to work with the Ecology CERCLA staff to get information on what exactly is a technology demonstration and to see if there is any written guidance or Hanford specific guidance covering this type activity.

5. **M-20-44 TPA Milestone Deliverables (Ecology/RL/PNL)**

H. Tilden (PNL) questioned whether the TPA Milestone would need to be revised for the Biological Part B Permit Application by December 31st. J. Wallace (Ecology) had met with Moses Jaraysi (Ecology) and they agreed there were two reasons why it would not: 1) the procedural closure, if it were conducted, would be adequate to fulfill the Milestone; 2) the TPA is going through a major rewrite which would impact the processing of change packages. B. Day (PNL) summarized by restating that the procedural closure would meet the Milestone and J. Wallace (Ecology) agreed. As a follow-up to this discussion C. Delannoy (RL) suggested a letter be transmitted to J. Wallace and Moses Jaraysi (both Ecology) stating that per the discussions in the UMP all parties understand and agree that the submittal of the procedural closure package, in lieu of the stated submission of the Biological Part B Permit Application, would meet the intent of the milestone.

6. **Lessons Learned on the Thermal and Physical/Chemical Treatment Test Facilities Procedural Closures**

This item was taken addressed under Number 4 and C. Delannoy's summary is included as Attachment 6.

7. **Status New Action Items**

● **New Action Items**

A meeting between C. Delannoy (RL), J. Wallace (Ecology) and M. Schlender (PNL) is to be scheduled for discussion to coordinate the priorities of whether to review the PMP first or the Thermal Procedural Closure.

● **Old Action Item**

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. PARTIALLY COMPLETE: 325 HWTU UMMs will be reviewed again to find where procedural closures were first mentioned.

8. General Discussion

J. Yokel (Ecology) present at meeting to get questions resolved in regard to the ISV Site, e.g. information on what was going to be tested, what mixture of chemicals were being placed into the tank and tested, what's left in the soil, if all contaminants were tested for, basically more of a historical background on the project is needed. The compliance report for the procedural closure packages cannot be finalized until these questions are resolved. A coordination meeting will be set up with PNL technical project staff to assist in resolving these questions.

Ecology would like to alternate the location of the meetings with every other UMP to be held at Ecology's Kennewick Office.

C. Delannoy (RL) asked if Ecology would find inclusion of any other activities beneficial for the UMMs. J. Wallace (Ecology) stated her supervisor would be interested in Identifying the RCRA Units under his responsibility and touring some of those units; however these activities should not be scheduled with the UMMs. Units of interest are 324 REC, 325 and 305-B. J. Wallace (Ecology) would like to do at least quarterly walkthroughs and will check with her supervisor for possible dates and times available.

J. Wallace (Ecology) requested the possibility of getting a turn-around office or establishing one for her in the 300 Area. C. Delannoy will check with EMT.

M. Schlender informed everyone that L. Russell (Ecology) will be conducting an inspection of the Biological Treatment Unit and reviewing the Certifications on October 25th.

J. Wallace (Ecology) requested information on the Washington Department of Health Notice of Correction for the Thermal Treatment Unit. H. Tilden (PNL) said the NOC has been resolved, a Notice of construction was submitted to Health and later approved. Copies of the Notice of Construction and the Approval will be supplied at the next 324 REC/HLV UMM since it involved the 324 B-Cell.

9 Next Unit Managers Meeting

- Proposed November 8 Date
- Proposed Topics

Report from Ecology on the results of the Compliance Inspection conducted on October 25th.

Attachment 4

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

October 18, 1995
 3:00 p.m. to 4:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
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 (PNL)
10-18-95 Reassigned	ACTION: D. Lutter (PNL) OPEN
10-18-95:1	D. Lutter (PNL) will prepare a DSI for RL to transmit Documents to the Administrative Record. ACTION: D. Lutter (PNL) OPEN
10-18-95:2	J. Wallace (Ecology) to submit list of comments on the Thermal and Physical/Chemical Procedural Closure and D. Lutter (PNL) will track them and the responses on a NOD type table. ACTION: D. Lutter (PNL) OPEN
10-18-95:3	Schedule a meeting with J. Wallace (Ecology), C. Delannoy (RL), M. Schlender (PNL) and D. Lutter (PNL) to discuss prioritization of the PMP vs , Procedural Closure, and boundary of the 324 REC/HLV. ACTION: D. Lutter (PNL) OPEN
10-18-95:4	Comments to C. Delannoy (RL) on the "Lessons Learned" Summary (Attachment 6) by October 27th. ACTION: All UMM Participants OPEN

10-18-95:5

Letter to Ecology summarizing understanding that no TPA revision is need since submission of the Procedural Closure would be adequate to meet the TPA Milestone date of December 31, 1995.

ACTION: H. Tilden (PNL)

OPEN

10-18-95:6

Investigate establishing an Ecology turn-a-round office in the 300 Area.

ACTION: C. Delannoy

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Attachment 5

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

**October 18, 1995
3:00 p.m. to 4:00 p.m.**

Administrative Record Documentation List

ADMINISTRATIVE RECORD REVIEW DOCUMENTS	
LETTERS	DATE
"PART A WITHDRAWAL PETITION" - Roger Stanley letter to R.D. Izatt, R.E. Lerch, and T.D. Chikalla	August 17, 1989
"WITHDRAWAL OF PART A AND PART B PERMIT APPLICATIONS (MILESTONE M-20-45)" - R.D. Izatt and T. D. Chikalla letter to Terry Husseman	June 22, 1989
"WITHDRAWAL OF PART A AND PART B PERMIT APPLICATIONS (MILESTONE M-20-45)" - R.D. Izatt and R.E. Lerch letter to Terry Husseman	June 22, 1989
"SUPPLEMENTAL INFORMATION REGARDING PART A WITHDRAWAL PETITIONS" - T.D. Chikalla letter to R.D. Izatt	October 11, 1989
"HANFORD FACILITY DANGEROUS WASTE PERMIT, CONSOLIDATION OF 325 HAZARDOUS WASTE TREATMENT UNIT AND THE PHYSICAL/CHEMICAL TEST FACILITY RCRA PART A AND PART B PERMIT APPLICATIONS" - Jeanne Wallace letter to James D. Bauer	May 18, 1994
"INITIATION OF PROCEDURAL CLOSURE FOR NONOPERATIONAL TREATMENT, STORAGE AND /OR DISPOSAL UNITS" - James E. Rasmussen and Kenneth C. Brog to Jeanne J. Wallace	July 14, 1995
"REGULATION OF SIMULATED WASTE" - Jeanne J. Wallace to James E. Rasmussen and Kenneth C. Brog	September 11, 1995
cc:Mail	
"Milestone Deliverables" - Jeanne J. Wallace to C.E. Clark, C.R. Delannoy, M.A. Barnard, M.H. Schlender, H.T. Tilden, B.J. Day, M.N. Jaraysi, S.V. Moore, J.J. Wallace	September 12, 1995
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER - CHANGE CONTROL FORMS	
Change Number M-20-92-7, Milestone M-20-42	May 13, 1993
Change Number M-20-94-08, Milestone M-20-42 (42A)	December 30, 1994
Change Number M-20-94-09, Milestone M-20-43(43A)	December 30, 1994

ADMINISTRATIVE RECORD REVIEW DOCUMENTS	PAGE 2 OF 2
UNIT MANAGER MEETING MINUTES	
PNL-NON-OPERATIONAL UNITS	May 3, 1995
	May 31, 1995
	June 28, 1995
	August 24, 1995
325/3100 HAZARDOUS WASTE TREATMENT UNIT	October 28, 1993
	December 9, 1993
	January 26, 1994
	February 22, 1994
	March 29, 1994
	May 5, 1994
	June 7, 1994
	July 14, 1994
	September 20, 1994
	March 13, 1995
	April 13, 1995
	May 31, 1995
	June 28, 1995

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Attachment 6

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

**October 18, 1995
3:00 p.m. to 4:00 p.m.**

Summary of Lessons Learned Meeting

PH IAN R 1350471C
9513387.0615

9/20/95 Non-Op Units URM
HWD DELIVERED TO Ecology: L. Russell
J. Wallen

RE: REQUESTED INFORMATION CONCERNING PROCEDURAL CLOSURE OF PHYSICAL / CHEMICAL AND THERMAL TREATMENT PART A APPLICATIONS 8/9/95
m's

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_x, CO_x, and SO_x. 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.

Distribution:

M. A. Barnard	RL	L4-40
R. C. Bowman	WHC	H6-24
G. H. Fess	PNL	P7-79
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
C. R. Delannoy	RL	A5-15
D. L. Duncan	EPA Region 10	HW-106
G. D. Hendricks	GSSC	B1-42
S. M. Price	WHC	H6-23
M. H. Schlender	PNL	K6-25
H. T. Tilden II	PNL	P7-79
J. J. Wallace	Ecology	B5-18
RCRA Files	WHC	H6-24

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

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail
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Please send comments on distribution list to D.K. Lutter (P-79), (509)
376-5631.