

**START**

Meeting Minutes Transmittal

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

May 3, 1995  
2:00 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.

\_\_\_\_\_ Date: \_\_\_\_\_  
Clifford E. Clark, Unit Manager, RL

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

Jeanne J. Wallace \_\_\_\_\_ Date: 5/31/95  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

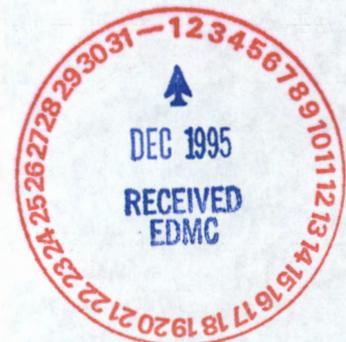
PNL Non-Operational Units, PNL Concurrence

\_\_\_\_\_ Date: \_\_\_\_\_  
Harold T. Tilden, 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 1

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

May 3, 1995  
2:00 p.m. to 4:00 p.m.

Agenda

1. Introductions (Ecology/RL/PNL)
2. History on PNL Non-Operational Interim Status Units (RL/PNL)
  - 332 Storage Facility
  - 324 Sodium Removal Pilot Plant
  - Biological Treatment Test Facilities
  - Thermal Treatment Test Facilities
  - Physical/Chemical Treatment Test Facilities
3. Path Forward Document (RL/PNL)
4. Recommended Actions/Required Documentation for Closure of Units (Ecology/RL/PNL)
5. General Discussion (Ecology/RL/PNL)
6. Status New Action Items (Ecology/RL/PNL)
7. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Proposed May 31 date
  - Proposed topics

## Attachment 2

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

May 3, 1995  
2:00 p.m. to 4:00 p.m.

## Summary of Discussion and Commitments/Agreements

## 1. Introductions

This was the first Unit Managers Meeting held for the following five PNL non-operational units: 332 Storage Facility, 324 Sodium Removal Pilot Plant, Biological Treatment Test Facilities, Thermal Treatment Test Facilities, and Physical/Chemical Treatment Test Facilities.

## 2. History on PNL Non-Operational Interim Status Units

Mr. H. Tilden (PNL) provided a brief history of the 332 Storage Facility and 324 Sodium Removal Pilot Plant.

## ● 332 Storage Facility

During 1988, PNL was using the 332 Storage Facility as a less than 90-day storage facility for accumulation of waste shipments. PNL waste was transported by WHC to the 616 Facility. When the 305-B Facility became available, PNL shifted to a plan to use the 305-B Facility for their waste management requirements.

However, a Part A permit application (Form 3) was filed for the 332 Storage Facility for two reasons: 1) 305-B was still under modification, and research activity was ongoing in the building; 2) 305-B did not qualify for the uniform fire code for highly flammable materials.

The 332 Facility was considered as a storage alternative for large quantities of flammable materials. However, PNL did not utilize large amounts of flammable material, and since 1988 the accumulation of waste and shipment activities that have exceeded 90-day storage have all taken place in the 305-B Facility.

As a result, the 332 Facility lapsed into disuse until it began housing a packaging laboratory which tests packages to establish Department of Transportation approval. The packaging laboratory is still operating in the 332 Facility.

Ms. J. Wallace (Ecology) inquired about interim functions that may have taken place at the 332 Facility between operation of the 90-day storage and operation of the packaging laboratory. Mr. Tilden responded that large quantities of floor-dry material

were stored for a short period of time; but due to the remote location of the facility, it has been used infrequently.

Mr. Tilden stated that in 1989, RL/PNL provided Ecology a package requesting administrative withdrawal of the Form 3 for the 332 Storage Facility. Ms. Wallace confirmed that she had a copy of the information. Mr. C. Clark (RL) noted that following submittal of the request for administrative withdrawal in 1989, Ecology agreed to the process; however, the Form 3 was never withdrawn. Mr. Clark indicated that Mr. M. Jaraysi (Ecology) is developing a process for procedural closure.

- **324 Sodium Removal Pilot Plant**

The Sodium Removal Pilot Plant was a project to decontaminate metal parts that were contaminated with liquid sodium. The project was operated in Room 146 of the 324 Building. Mr. Tilden stated that records indicate the process was operated on nonradioactive sodium metal for demonstration, and then the process was shut down and all the parts were dismantled.

Ms. Wallace asked if another activity is being conducted in the room. Mr. M. Schlender (PNL) responded that it was not known, and Ms. Wallace suggested that PNL determine whether or not any activity is taking place.

Mr. Tilden stated that PNL possess the log book for the demonstration process that took place.

- **Biological Treatment Test Facilities**

Ms. Wallace indicated that she was familiar with this unit and did not need a history of the unit.

- **Thermal Treatment Test Facilities**

Ms. Wallace indicated that she was familiar with this unit and did not need a history of the unit.

- **Physical/Chemical Treatment Test Facilities**

Ms. Wallace indicated that she was familiar with this unit and did not need a history of the unit.

### 3. Path Forward Document

Mr. Tilden stated that PNL's draft path forward document proposes to procedurally close the five non-operational units. RL/PNL will provide the necessary documentation to satisfy Ecology that the units never managed dangerous waste and therefore qualify for procedural closure under Section 6.3.3 of the Tri-Party Agreement (TPA). Mr. Tilden noted that the TPA does not specify what comprises the required documentation for procedural closure to be submitted to Ecology, except for a certified statement.

Mr. Tilden stated that the documentation provided to Ecology would reference the administrative controls that have been in place since the Part A permit applications for the five units were filed in 1988. The administrative controls required documentation of waste treatment or storage activities to be submitted to the environmental compliance organization for approval from DOE before start-up. Mr. Tilden noted that no activities were processed during that time (1988 forward), except for the activities in the 325 Shielded Analytical Laboratory, which have been transferred to the 325 activities Part A.

Another form of documentation would include statements gathered from operations managers responsible for operations in the buildings identified in the Part A's. These statements would verify that none of the permitted activities took place. Guidance to the operations managers would advise verification by using the following tools: interviews with project managers; spot checks of operating logs for laboratories or projects of specific interest; and review of organizational records for project(s) proposals involving treatment of waste or waste simulants.

The third form of documentation would entail an on-site review of the facilities by DOE staff to ensure that hazardous waste was not treated, and to obtain statements from employees to corroborate the results of DOE's reviews.

#### 4. Recommended Actions/Required Documentation for Closure of Units

RL and PNL discussed the available information and the various forms of record search which would provide documentation to Ecology in support of procedural closure. Mr. R. Bowman (WHC) pointed out that a package will be submitted to RL's manager and the presidents of the various companies before closure certification may be obtained, and he suggested that RL/PNL provide the same package to Ecology.

#### 5. General Discussion

There were no topics for general discussion.

#### 6. Status New Action Items

There were no action items generated during the meeting.

#### 7. Next Unit Managers Meeting

- Proposed May 31 Date

The next meeting was scheduled for May 31, 1995, to follow the 325 HWTU Unit Managers Meeting.

- Proposed Topics

There were no new topics proposed for the next meeting.



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Attachment 4

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Richland, Washington

May 3, 1995  
2:00 p.m. to 4:00 p.m.

Action Items

Action Item #

Description

None

## Distribution:

E. M. Bowers	RL	K8-50
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
D. L. Duncan	EPA Region 10	HW-106
G. D. Hendricks	GSSC	B1-42
K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
J. J. Wallace	Ecology	B5-18

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

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P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail  
Stop HW-106 (Records Center)

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