

ERDF Interface Meeting Minutes Building MO-607

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy
under Contract DE-AC06-08RL14788

CH2MHILL
Plateau Remediation Company

P.O. Box 1600
Richland, Washington 99352

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APPROVED
By Julia Raymer at 9:58 am, Feb 04, 2020

Release Approval

Date

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SUBJECT	ERDF Interface Meeting Minutes Building MO-607
TO	Distribution
FROM	B. L. Lawrence
DATE	November 13, 2019
ATTENDEES	DISTRIBUTION
W. A. Borlaug, T2-03	Attendees
C. E. Cameron (EPA), A3-46	J. E. Bramson, A6-01
L. M. Dittmer, N2-02	J. M. Curnutt, T2-07
D. A. Duranceau, T2-05	R. Havenor, T2-05
L. A. Hood (EPA), A3-46	D. R. Hildebrand (RL), A6-38
B. L. Lawrence, T2-03	T. L. Hobbes, A7-01
J. P. Neath (RL), H5-20	J. Johanson, L4-45
B. A. Stetter (RL), H5-20	C. H. Larson, T2-03
D. B. Teachout, T2-03	M. Lopez (RL), H5-20
L. D. West, L1-16	K. R. Thompson, R3-60
Z. P. Walton, N2-02	S. L. Trine (RL), R3-50
	Administrative Records

A meeting was held on November 13, 2019 at CH2MHILL Plateau Remediation Company (CHPRC) Building, MO-607, Richland, Washington and these minutes are a summary of the discussions.

ADMINISTRATIVE

- Next ERDF Interface Meeting – The next meeting is scheduled for Wednesday, December 11, 2019
- Attendees/Delegations – Representatives from the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Energy, Richland Operations Office (RL) were present to conduct the business of the meeting
- Approval of Minutes – Meeting minutes from the October 16, 2019 meeting were approved
- Agenda – Attachment 1 is the meeting agenda

TOPICS DISCUSSED

Safety Topic

Operations – Dave Duranceau

- **Status General Operations**
 - ERDF disposal operations has been slow
 - ERDF has been disposing of ~30 waste containers per week
 - ERDF offloaded a Tank Farms long-length waste item this week

- **Waste Forecast**
 - ERDF will continue to receive waste from PFP, groundwater projects, and OHC projects
 - The 100-K project has been delayed to around January 2020

Engineering – Bill Borlaug

- **Macro Bags (300-296 Project)**
 - The 300-296 Project is evaluating a potential alternative disposal option for waste that meets macroencapsulation standards. The MacroBag® vendor purports to have obtained EPA approval as meeting the requirements for macroencapsulation.
 - The MacroBag® completely macroencapsulates the waste, making it resistant to degradation by the debris and its contaminants and materials into which it may come into contact after placement, thus meeting the Land Disposal Restriction of 40 CFR 268.45, Treatment Standard for Hazardous Debris, radioactive Mercury, Silver, and Cadmium batteries, and 40 CFR 268.40 Radioactive Lead Solids.
 - The EPA will need to agree that the MacroBag® meets the requirements for macroencapsulation per 40 CFR 268.40 and 40 CFR 268.45.

- **Leachate Sample Data Results**
 - The quarterly leachate sample data results for the months of May and August were discussed during the meeting (see attachments)

- **Structural Stable Containers**
 - To provide ALARA worker safety (e.g. 324 Building high dose waste), discussed the use of structurally stable containers, as defined in ERDF-00011, ERDF WAC, for use without void filling.
 - The structurally stable containers would be constructed using reinforced concrete designed to structurally support the overburden waste, final cover, and equipment loads (140 psi minimum).
 - ERDF EPA representative will discuss with 324 Building EPA representative and provide feedback.

- **Greater-Than-Class C Waste**
 - Discussed acceptance of NRC greater-than-Class C waste for grouting at ERDF, when grouting would render the waste Class C waste suitable for disposal at ERDF per the WAC
 - ERDF WAC currently prohibits acceptance waste exceeding the NRC Class limit, as defined in 10 CFR 61.55, unless justified by a specific PA.

- DOE O 435.1 classifies waste as HLW, TRU, or LLW. DOE does not have a GTCC classification. The WAC sets the limits for what LLW can be disposed of at a near surface disposal facility, and are based on the PA and meeting the DOE performance objectives and performance measure.
 - EPA commented that revising the WAC to allow GTCC waste may be a significant change that would require a public review. EPA will consider and provide feedback.
 - Calculation of NRC waste classification required by procedure [PRC-PRO-WM-40519].
- **100K Project – Lead Painted Metal Hangers**
 - A change room (Room 16) in the 105KW Facility was being cleared of waste to support future remediation [demolition] activities.
 - Angle iron and rebar metal pieces embedded in the wall were painted to prevent personnel from striking the metal while changing. The paint used is a lead based paint. The metal pieces were cleaved from the wall and bagged for eventual disposal as a hazardous waste.
 - Waste (non-hazardous) from other areas was loaded into an ERDF container. This waste has elevated contamination levels. Inadvertently, the painted metal pieces (carrying the D008 characteristic code) were placed into the same ERDF container.
 - The project does not desire to make any entry into the container for the purposes of retrieving the painted metal. This is based on the potential for elevated contamination levels in the container.
 - Application of the D008 waste code invokes the necessity to treat the waste – macroencapsulation. The project has proposed sacrificing the ERDF container and macroencapsulating the container and waste.
 - Many options are being explored prior to treating and disposing both the container and the waste.

Environmental – Barry Lawrence

- **CY2017 ERDF Annual Report (ERDF-00075) – EPA & DOE Review**
 - The EPA and DOE had no further comments on the CY2017 annual report
 - The report will be processed for clearance and the DOE and EPA provide copies within the next few weeks
- **Approval of the Meeting Minutes**
 - The minutes from the October 16, 2019 meeting were previously approved
- **Next ERDF Interface Meeting**
 - The next meeting is scheduled for Wednesday, December 11, 2019

Attachment 1

ERDF Regulatory Interface Meeting November 13, 2019

Safety Topic

Operations – Dave Duranceau

- Status Operations
- Waste Forecasts

Engineering – Bill Borlaug

- Macro Bag (300-296 Project)
- Leachate Sample Data Results
- Structural Stable Containers
- Greater-Than-Class C Waste

Environmental – Barry Lawrence

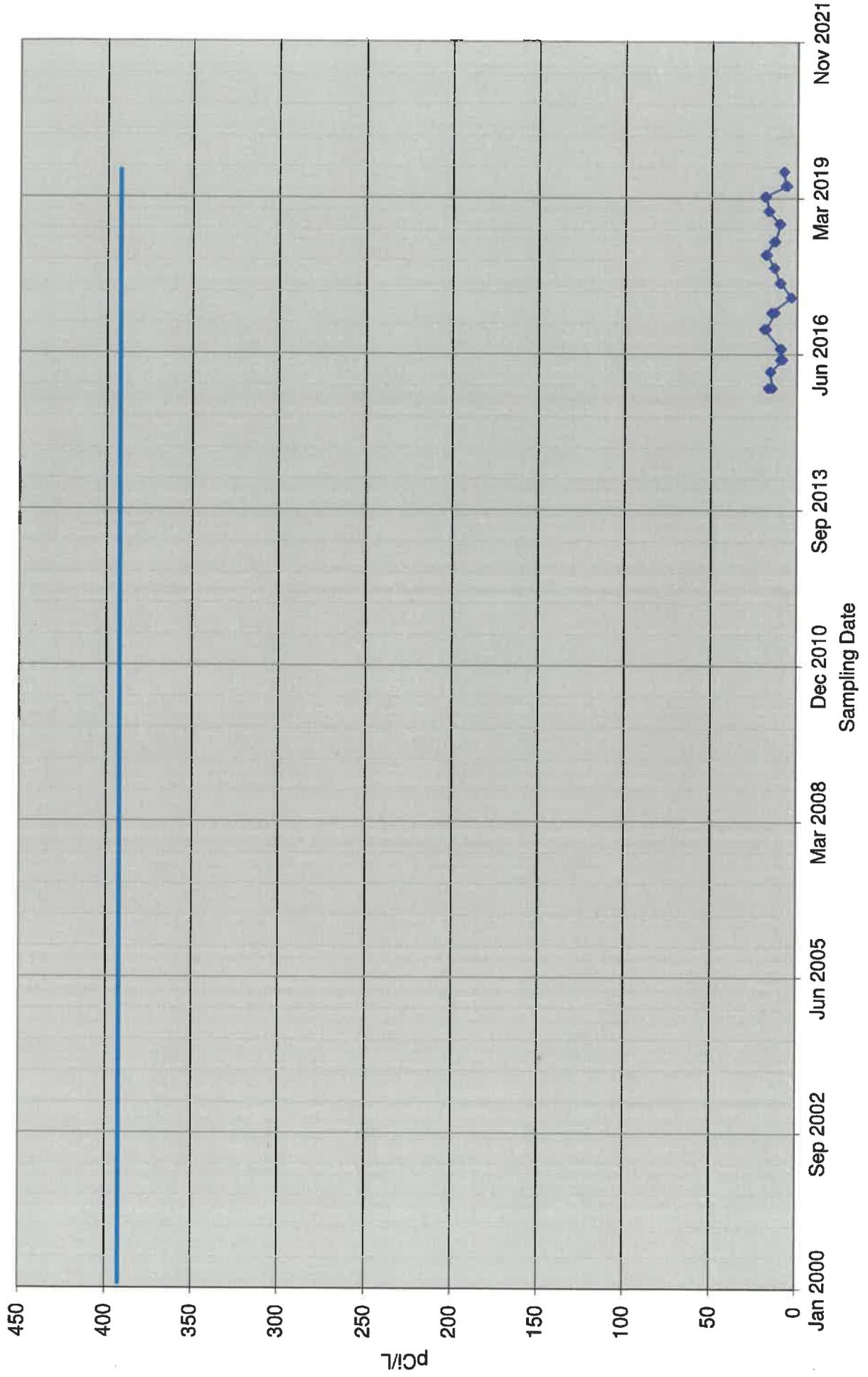
- CY2017 ERDF Annual Report (ERDF-00075) – EPA & DOE Review
- Approval of the October 16, 2019 meeting minutes
- Next ERDF Regulatory Interface Meeting – December 11, 2019

Attachment 2

Leachate Quarterly Sample Data

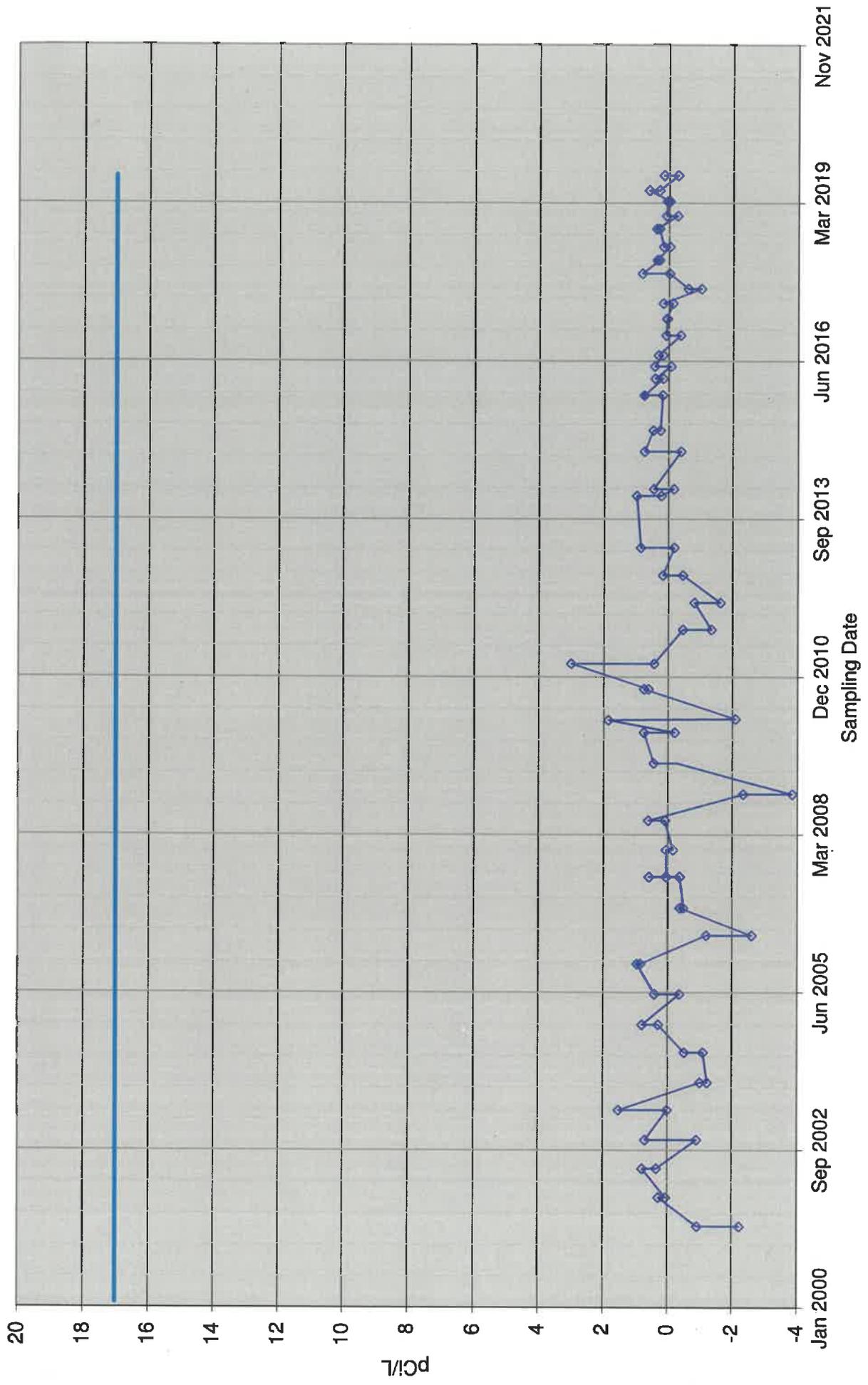
Radioactive Strontium

—◆— Rad Sr ERDF Leachate — 200WPTF Action Level (Initiate Active Influent Management)



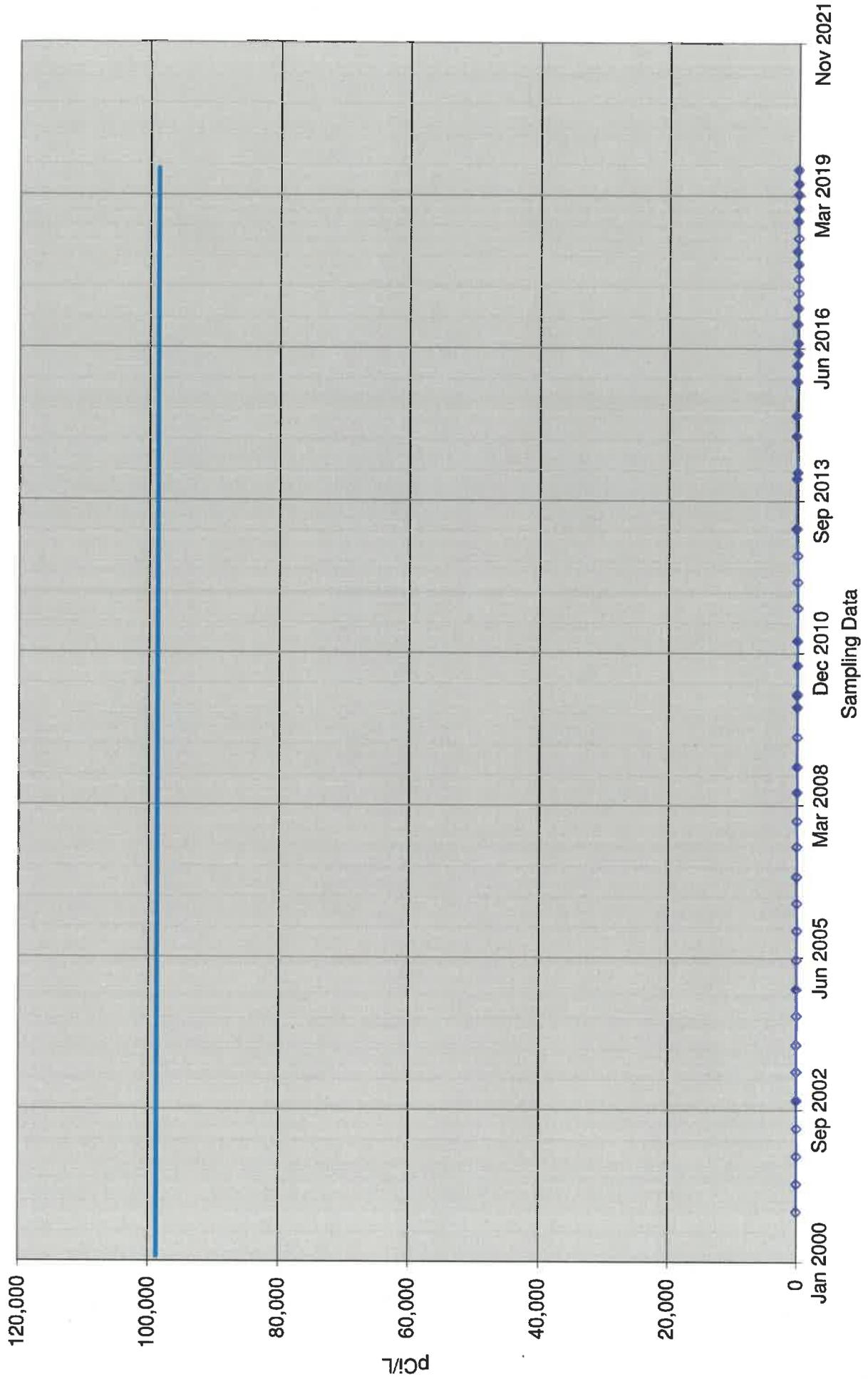
Iodine-129

—◇— I-129 ERDF Leachate — 200WPTF Action Level (initiate Active Influent Management)



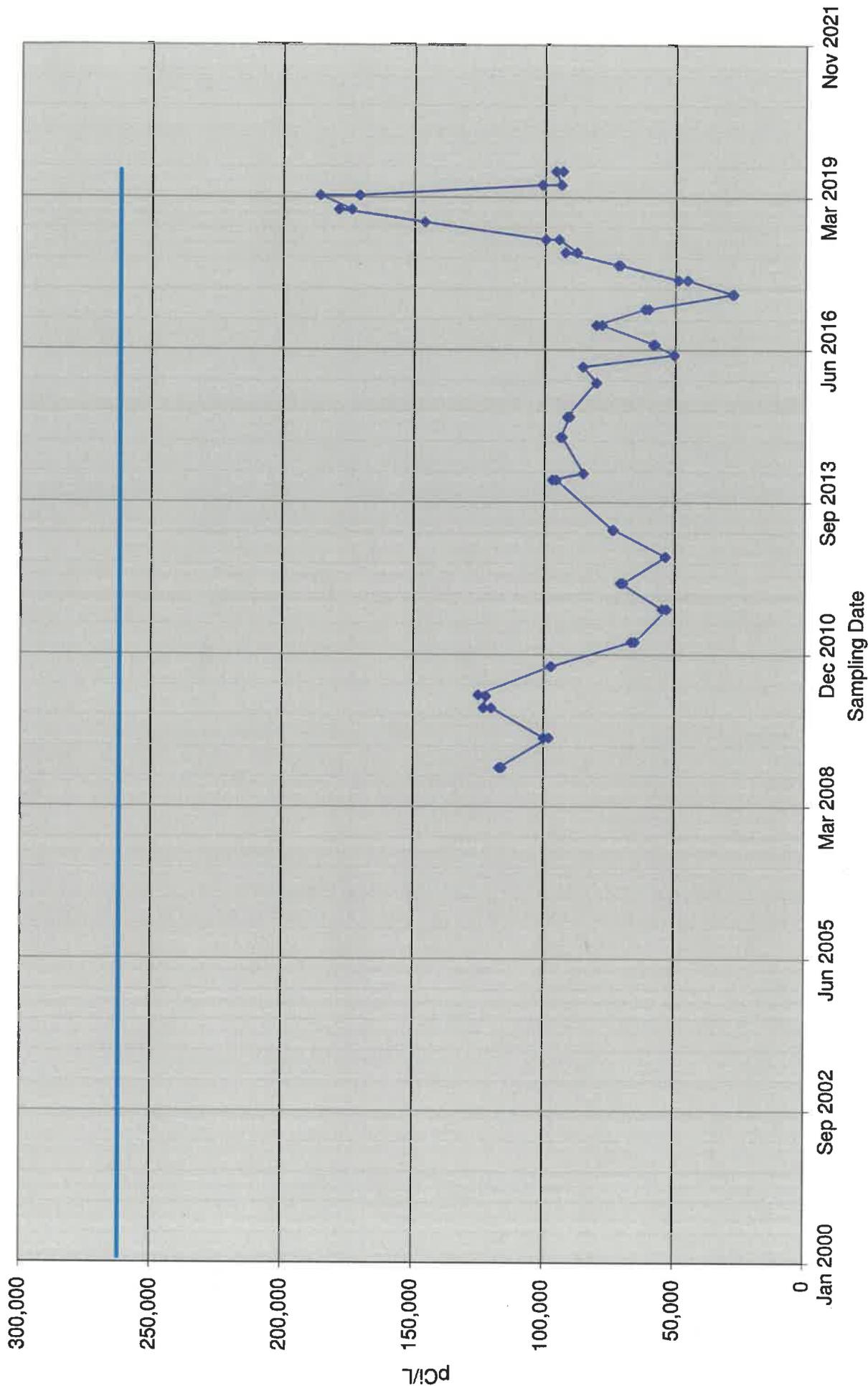
Carbon-14

—●— C-14 ERDF Leachate — 200WPTF Action Level (Initiate Active Influent Management)



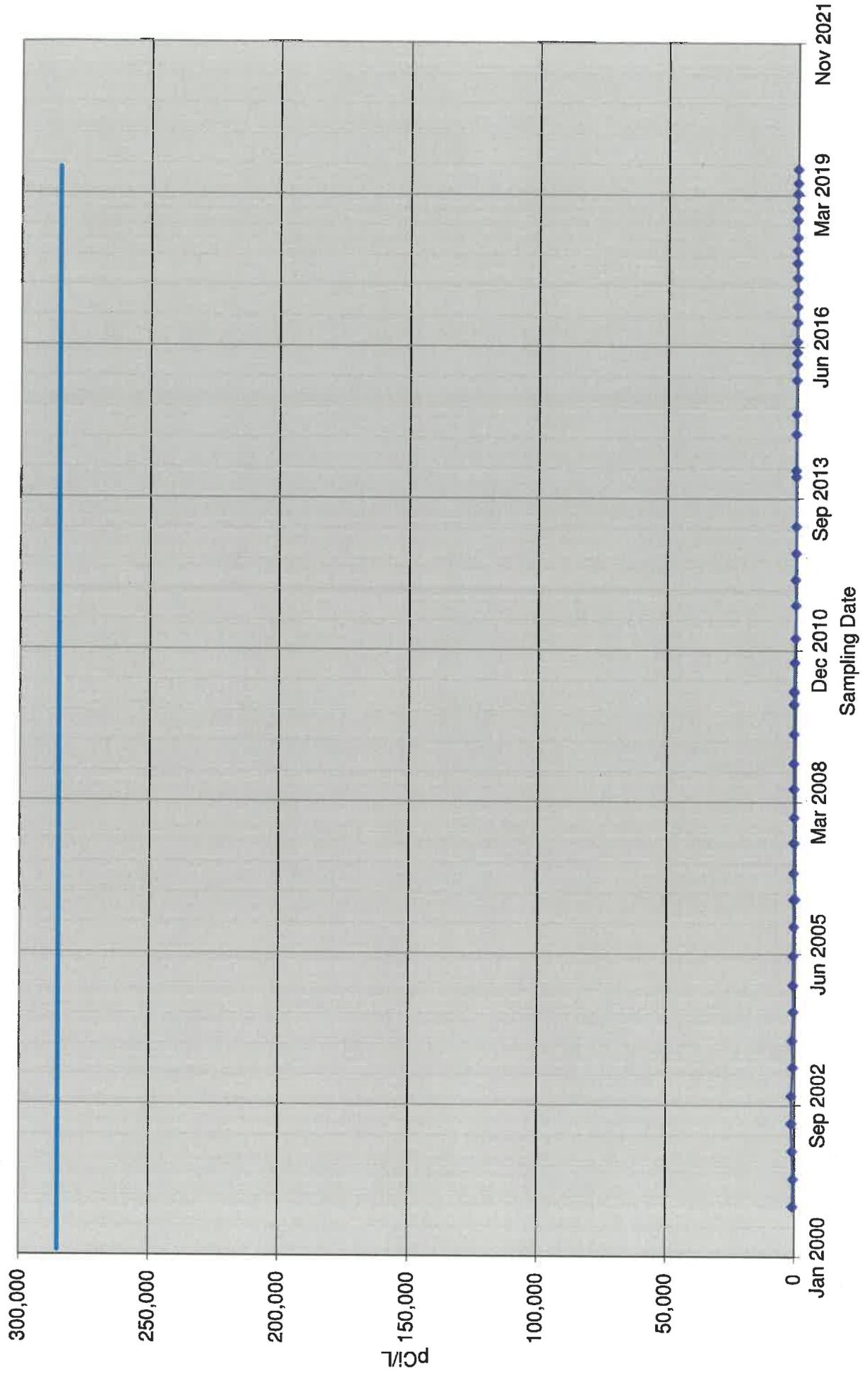
Tritium

—●— H-3 ERDF Leachate — 200WPTF Action Level (Initiate Active Influent Management)



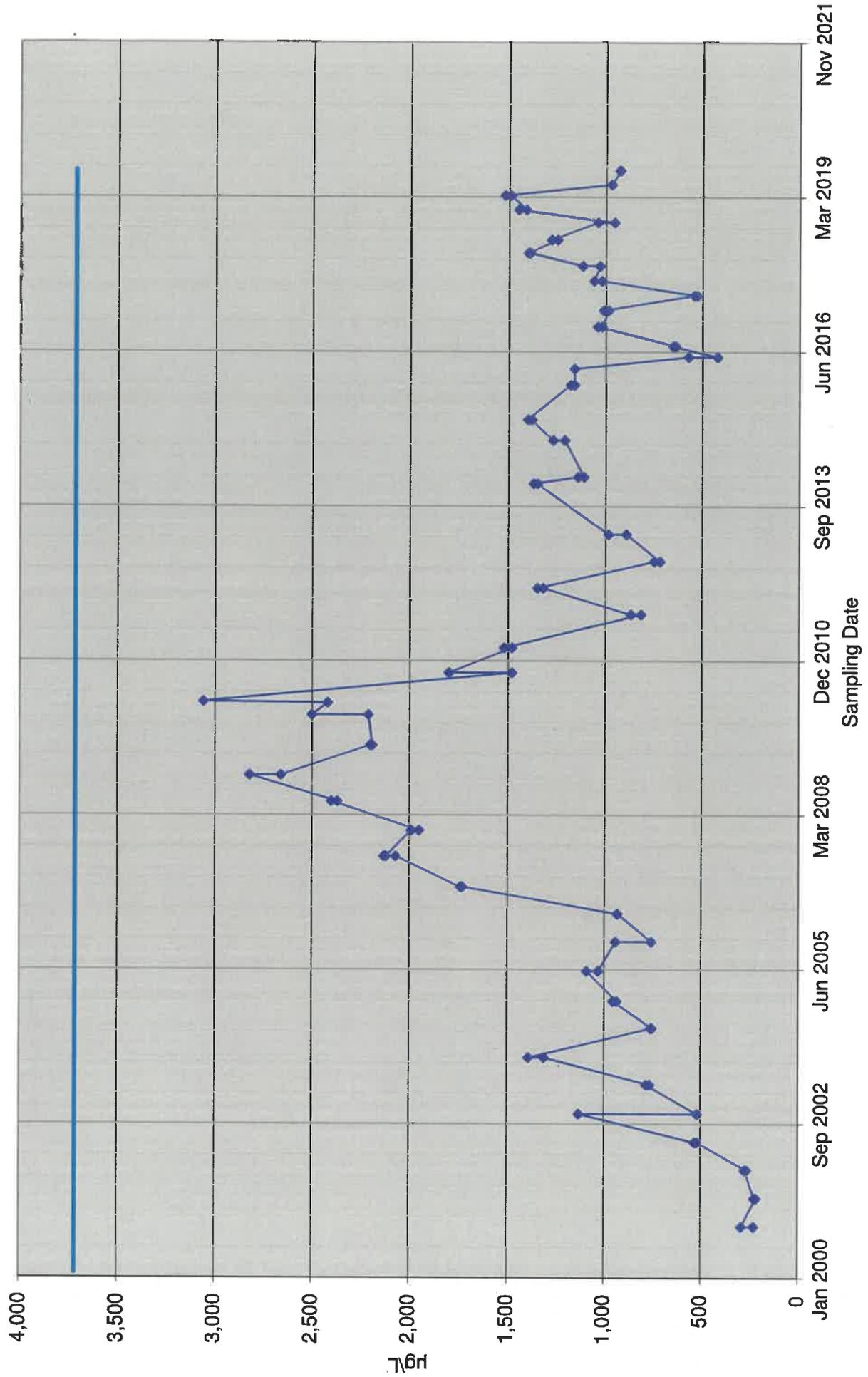
Technetium-99

◆ Tc-99 ERDF Leachate — 200WPTF Action Level (Initiate Active Influent Management)

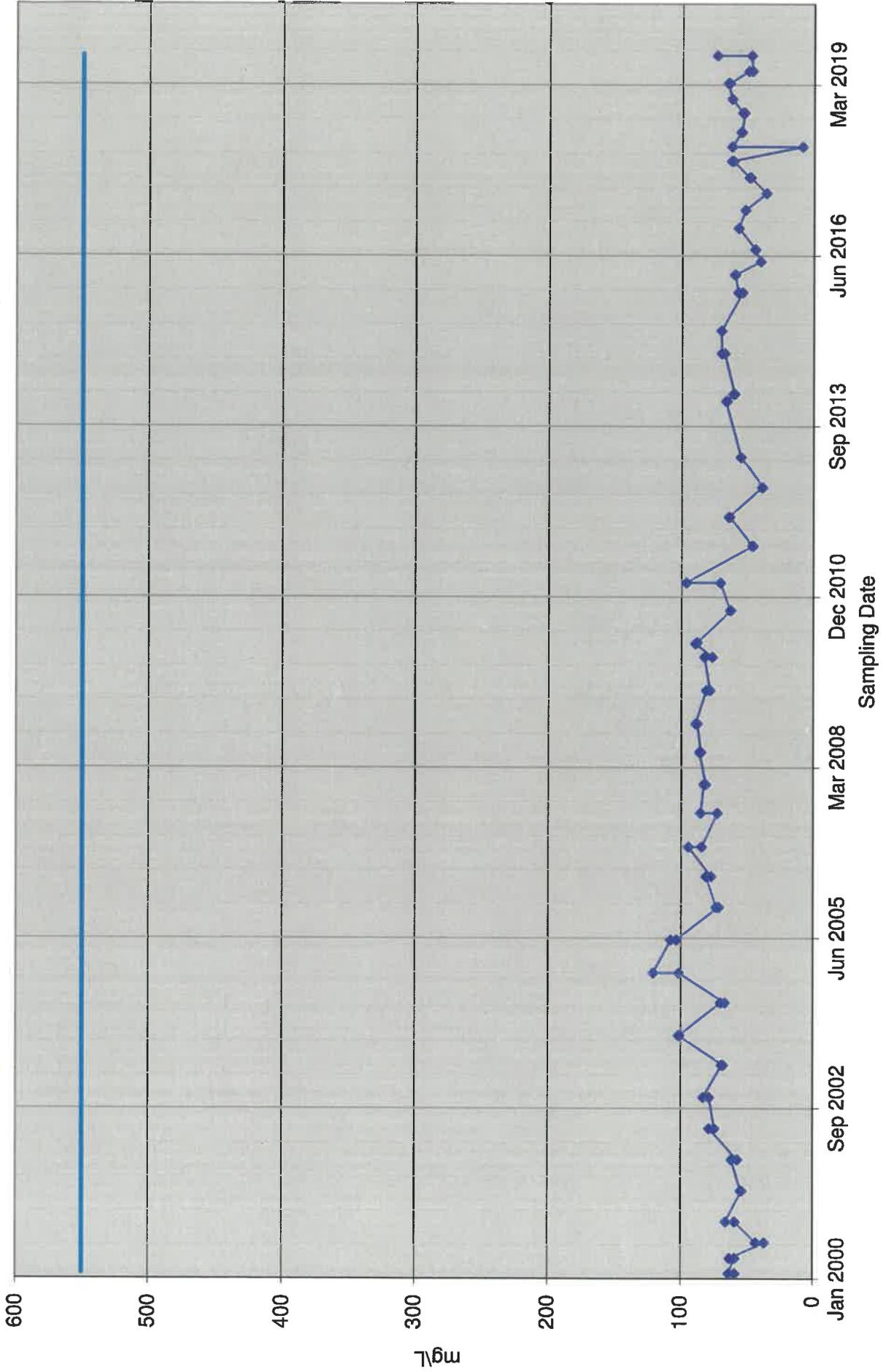


Total Uranium

— U ERDF Leachate — 200WPTF Action Level (Initiate Active Influent Management)

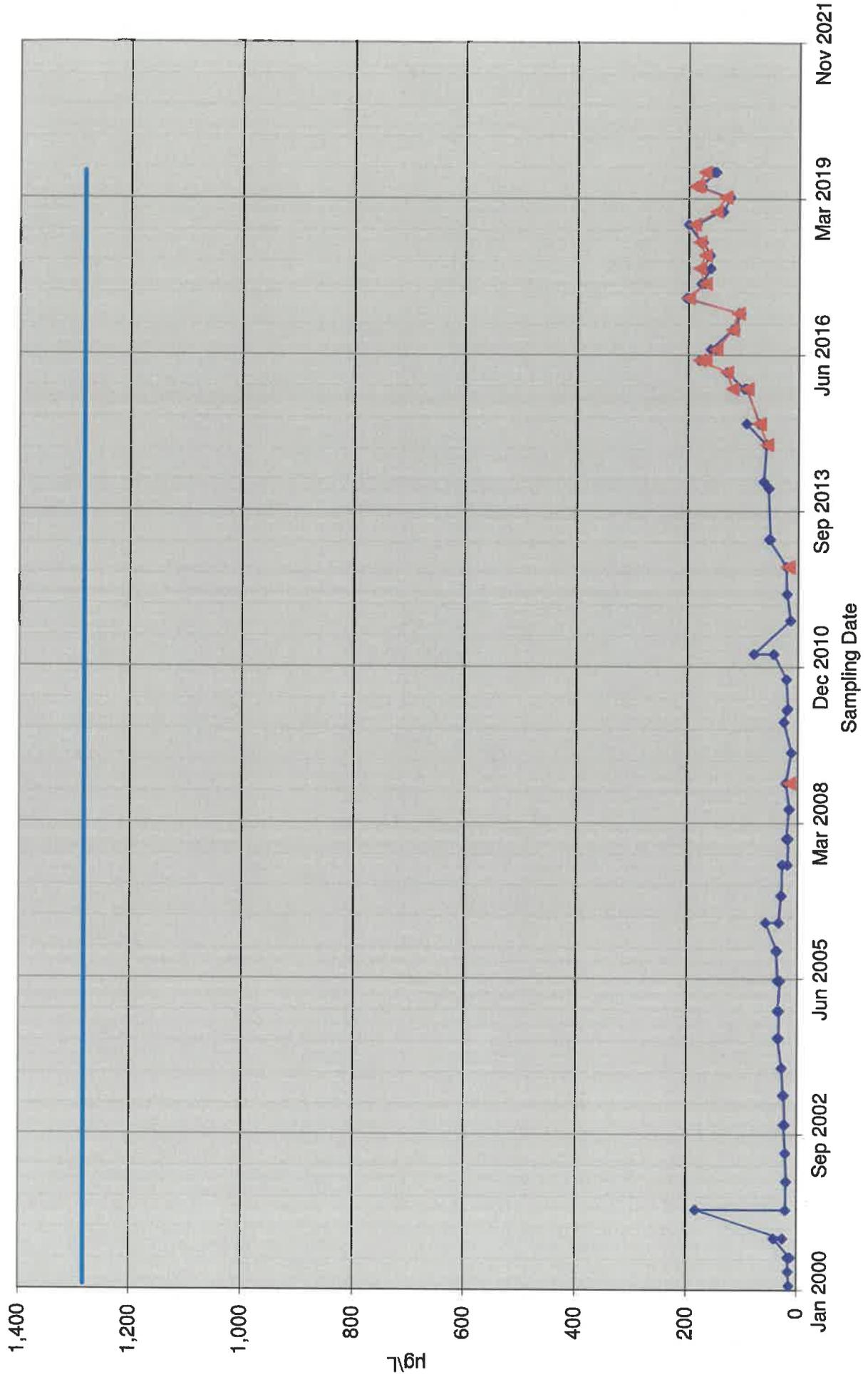


Nitrate as N
 ◆ Nitrate - N ERDF Leachate
 — 200WPTF Action Level (Initiate Active Influent Management)

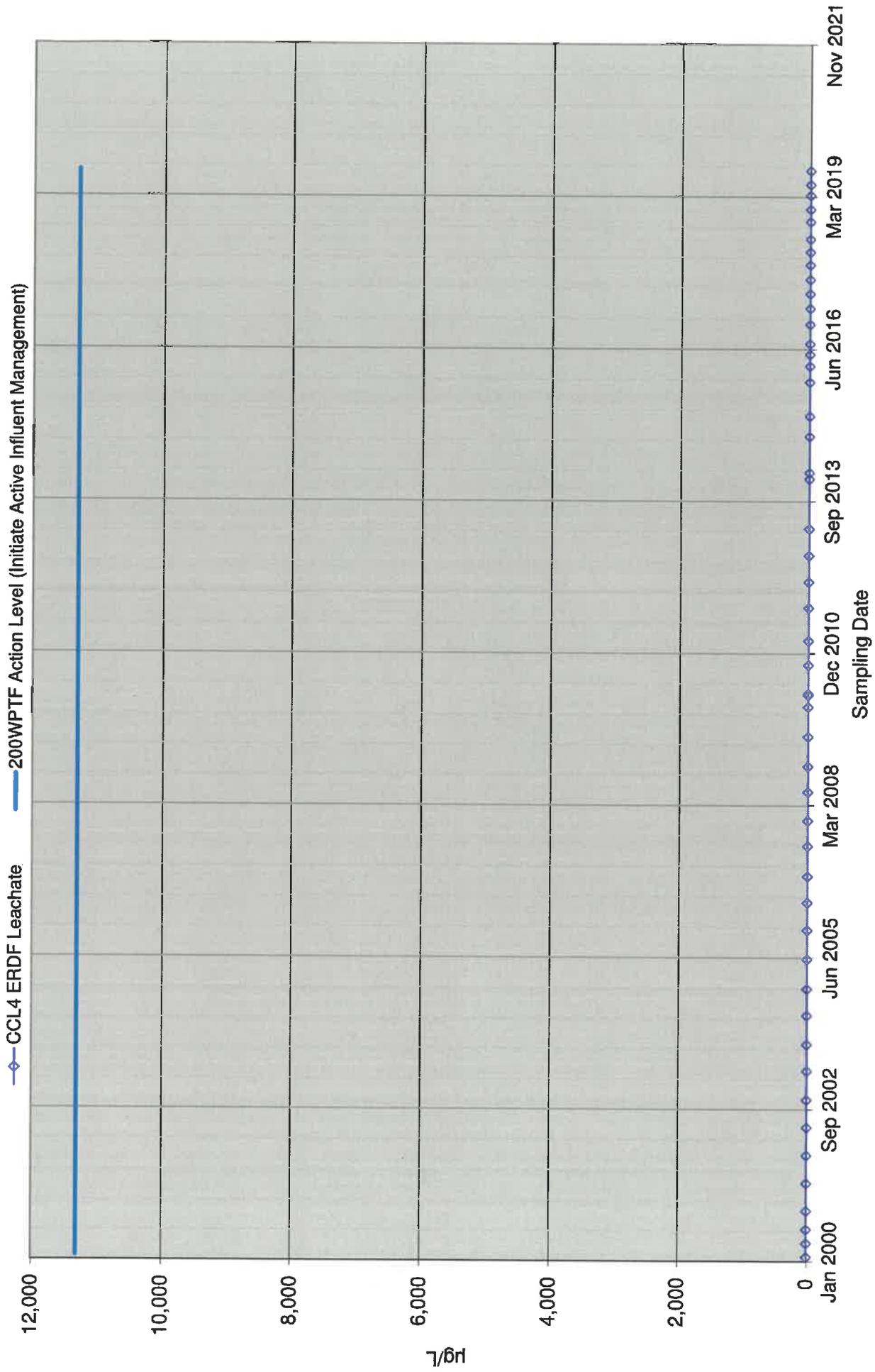


Chromium

—◆— Total Chromium ERDF Leachate —▲— Hexavalent Chromium ERDF Leachate —◆— 200WPTF Action Level (Initiate Active Influent Management)



Carbon Tetrachloride



Sulfate

—●— Sulfate ERDF Leachate

