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Meeting Minutes Transmittal

Grout Treatment Facility/
Low-Level Waste Disposal
Unit Managers Meeting (Video Conference)
Federal Building, Room 784B
Richland, Washington

August 24, 1993
2:30 p.m. - 3:00 p.m.

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

RC Bowman For Date: 10/19/93
Clifford E. Clark, Unit Manager, RL
(Represented by Roger C. Bowman, WHC)

Daniel L. Duncan Date: 10/25/93
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Robert E Cordts Date: 20 Oct 93
Robert E. Cordts, Unit Manager, Washington State Department of Ecology

Grout, WHC Concurrence

Ralph F. Wood Date: 10/7/93
Ralph F. Wood, Contractor Representative, WHC



Purpose: Discuss Permitting 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 — Letter "Review of the Grout Treatment Facility Land Disposal Restriction (LDR) Compliance Paper"

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Unit Managers Meeting Agenda
Grout Treatment Facility/
Low-Level Waste Disposal
Federal Building, Room 784B
Richland, Washington

August 24, 1993
2:30 p.m. - 3:00 a.m.

1. APPROVAL OF PREVIOUS MEETING MINUTES
 2. PROGRAM STATUS - *Rudy Carreon, RL*
 3. RCRA TOPICS
 - Permit Application Status
 - NODs
 - Follow-up on TCLP White Paper — *Duc Nguyen*
 - Response Letter from EPA — Spike Recovery
 - EPA Response to LDR White Paper — *Bill Gretsinger*
 4. ACTION ITEMS
 - Past Action
 - 1. *Dan Duncan, EPA* — Concurrence on LDR White Paper
 - New Actions
 5. SCHEDULE OF NEXT MEETING
 - Tentative dates
 - Frequency of UMM's — Are monthly meetings needed?
 - Proposed topics
-

The meeting will take place via a video link at the
Federal Building, room 784B, 2750E, room C221, EPA Office Building, room 12B,
and Ecology Office Building, Lacey.

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Grout Treatment Facility/
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Federal Building, Room 784B
Richland, Washington

August 24, 1993
2:30 p.m. - 3:00 p.m.

Summary of Discussion and Commitments/Agreements

1. APPROVAL OF PREVIOUS MEETING MINUTES

No meeting minutes were presented.

2. PROGRAM STATUS

- An update on program status was given by Mr. R. Carreon (RL). The overall start-up schedule shows approximately a 9 month delay to the October 1993 Grout Facilities start-up. The Performance Assessment is currently undergoing the final Westinghouse review, which is performed by the Safety Environmental Advisory Council, prior to submittal to DOE-RL and Headquarters. All operational readiness activities (procedures, maintenance work packages, facility upgrades, ORR plan) are continuing to be worked until Ecology concurs on discontinuing the logical portion of these activities (a letter was sent to EPA and Ecology on 8/6/93). The Grout Cold Cap pump truck has been received on-site and is presently being serviced to cold-cap vault 101 in early FY 1994.
- Mr. D. Duncan (EPA) inquired about whether the start-up schedule for October 1994 is being addressed in the current Tri-Party Agreement negotiations, and whether the milestone is going to change. Mr. R. Carreon stated that it is not being proposed as the same exact milestone, rather as the start-up of the facility. The revised date would be July 1998, based having to wait for a pretreated waste to go into the Grout Facility (October 1993 to July 1998). Mr. R. Carreon stated that he sent a letter to Ecology and the EPA on the ramp down.

Mr. D. Duncan stated that he has not received the letter on the ramp down of Grout. Mr. R. Carreon stated that he would fax it to Mr. D. Duncan tomorrow, August 25, 1993.

3. RCRA TOPICS

- Ms. S. Thompson (WHC) asked whether Ecology would be responding to the NOD responses on schedule. Mr. B. Cordts (Ecology) stated that he would review the responses and notify RL/WHC.

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- Mr. D. Nguyen (WHC) stated that draft letter requesting clarification on the TCLP spiking is still being reviewed by RL and WHC, we plan to fax EPA the comments on the draft letter this week. Mr. D. Duncan stated that once he received the comments that he would transmit them to Mr. O. Fordham (EPA-Headquarters).
- Mr. B. Gretsinger (WHC) stated that RL/WHC has prepared a draft response on the LDR white paper and should be transmitted to the EPA in approximately 3 weeks. The only concern is the EPA asked for final Grout verification of TCLP for metals, and Grout does not intend to core drill every vault and do TCLP on final grouted material forever. There will be TCLP of grouted samples of feed samples that are prepared in Grout and prepared for TCLP. The idea is to develop a correlation between samples and final Grout performance and buy-in to that process.

Mr. D. Duncan asked if the Grout program intends to pursue BDAT? Or are there plans to go through a process, or is Grout going to show through pretreatment that the required standards are met?

Mr. R. Carreon stated as far as pretreatment (pretreatment of low-level waste) RL means the removable of cesium and strontium.

Mr. R. Wood (WHC) also stated that Grout is talking to Ecology regarding the second generation waste form. Mr. B. Gretsinger stated that no decision has been made on BDAT due to lack of information on organic concentrations throughout all of the tank farms to justify a BDAT determination at this point. It may be that only a few tanks will not meet the required standard, in which case those tanks would be addressed separately.

- Mr. D. Duncan commented further by stating that is the point EPA is trying to make in the letter. The EPA does not feel that on a tank by tank basis there has been enough analysis for RL to know what is in the tanks. The letter asked for our concurrence of this facility wide, the EPA is limited in doing that. The EPA does concur with RL's approach, but the EPA reserves the right to look at the data on a tank by tank basis.

Mr. R. Carreon restated that Grout plans to core the first DST vault. After that it will just be information from the lab test.

- Mr. R. Carreon inquired about the Grout ramp down letter. Mr. B. Cordts stated that Mr. T. Michelena (Ecology) has the letter and planned on discussing it with Mr. R. Stanley (Ecology). Mr. R. Carreon stated that RL would like some feedback on the draft letter, so that the letter could be sent out as quick as possible to start the Grout ramp down activity.

4. ACTION ITEMS

- Past Actions

Action item 5-14-93:1 was closed.

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▪ New Actions

Action item 8-24-93:1, Mr. D. Nguyen, set teleconference to resolve issues on spike recovery, due September 1993.

Action item 8-24-93:2, Mr. R. Carreon, RL response to Letter from EPA on clarification of the TCLP Spike Recovery, by next UMM.

5. SCHEDULE OF NEXT MEETING

The next meeting was scheduled for video conference October 13, 1993, in Richland, Washington.

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Grout Treatment Facility/
Low-Level Waste Disposal
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

August 24, 1993
2:30 p.m. - 3:00 p.m.

Attendance List

NAME	ORGANIZATION	PHONE #	MSIN
Roger C. Bowman	WHC	(509) 376-4876	H6-24
Rudy Carreon	RL	(509) 376-9461	R3-74
Robert Cordts	Ecology	(206) 459-6863	
Dan L. Duncan	EPA Region 10 (video conference)	(206) 553-6693	
Bill T. Gretsinger	WHC	(509) 373-9389	R4-01
Jerry Hensley	Ecology	(509) 736-3017	Kenn
Kathy E. Knox	WHC	(509) 372-3596	H6-24
Duc M. Nguyen	WHC	(509) 373-2984	R4-03
M. George Theo	WHC	(509) 376-0128	L4-89
Suzette A. Thompson	WHC	(509) 372-0958	H6-24
Ralph F. Wood	WHC	(509) 373-3973	R4-01

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Grout Treatment Facility/
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Federal Building, Room 784B
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August 24, 1993
2:30 p.m. - 3:00 p.m.

Action Items

<u>Action Item</u>	<u>Description</u>
6-14-93:1	EPA will provide a status on concurrence review for LDR White Paper. DUE: Next UMM ACTION: Dan Duncan STATUS: Closed
8-24-93:1	Set teleconference to resolve issues on spike recovery DUE: September 1993. ACTION: Mr. D. Nguyen STATUS: New
8-24-93:2	RL response to Letter from EPA on clarification of the TCLP Spike Recovery DUE: Next UMM. ACTION: Mr. R. Carreon STATUS: New

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**Grout Treatment Facility/
Low-Level Waste Disposal
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington**

**August 24, 1993
2:30 p.m. - 3:00 p.m.**

**Letter "Review of the Grout Treatment Facility
Land Disposal Restriction (LDR) Compliance Paper**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

9305708

Reply To
Attn Of: HW-106

July 27, 1993

Mr. Steve Wisness, Hanford Project Manager
Office of Environmental Assurance,
Permits, and Policy
Department of Energy
Richland Operations Office
P.O. Box 550 (A5-15)
Richland, Washington 99352

Re: Review of the Grout Treatment Facility Land Disposal
Restriction (LDR) Compliance White Paper
Environmental Protection Agency I.D. No. WA7 89000 8967

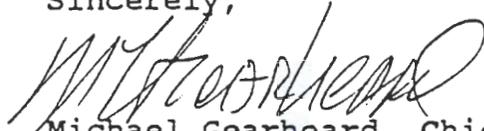
Dear Mr. Wisness:

The United States Environmental Protection Agency (EPA), Region 10, has reviewed the May 28, 1993 white paper from the United States Department of Energy-Richland Operations Office (Energy) regarding the Grout Treatment Facility Land Disposal Restriction (LDR) Compliance. The purpose of this letter is to provide comments on the white paper which outlines Energy's proposed methods for maintaining LDR compliance. The enclosed EPA comments address both general and specific comments on the white paper.

The EPA concurs with the approach in the white paper. The EPA believes that Energy must clearly demonstrate that grouting constitutes the Best Demonstrated Available Technology (BDAT) for heavy metals. In addition, it is not clear from the white paper that the grouted waste will be tested for LDR compliance. Therefore, the EPA will continue to review the chemical analyses (including organics) of all double shell and single shell candidate tank waste, as outlined in our response dated April 1, 1991, on a case-by-case basis, to ensure regulatory compliance with land disposal restrictions. Until the Grout Treatment Facility is determined to be BDAT, all double shell and single shell tank waste must meet applicable wastewater and nonwastewater land disposal treatment standards prior to treatment in the Grout Treatment Facility. If any additional information pertinent to the regulation of double shell and single shell tank waste becomes available, Energy must continue to inform EPA of any changes.

Please contact Daniel Duncan, Hanford Permit Coordinator, on
(206) 553-6693 if any additional information is required.

Sincerely,



Michael Gearheard, Chief
Waste Management Branch

cc:

Cliff Clark, Energy
George Hofer, EPA
Bob Cordts, Ecology
Russ Murkowski, WHC

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EPA COMMENTS ON
GROUT TREATMENT FACILITY LDR COMPLIANCE WHITE PAPER

General Comments:

The white paper should also address the additional testing that will be conducted to ensure applicable LDR regulations are met after grouting of waste. It is not clear from the white paper that the grout will be tested for LDR compliance after treatment.

Specific Comments:

1. Page 1 of 10, Section 3.1, LDR Waste Acceptance Requirements:

- The reference to Subpart D of 40 CFR § 268 should specify 40 CFR §§ 268.40 through 268.46
- Regarding the Immobilization Technology: The reference to extraction and/or destruction is an overstatement of the regulation. This applies specifically to debris.
- Dilution is not permissible to meet a standard i.e. wastewater vs. nonwastewater.

2. Page 2 of 10, Section 3.1, LDR Waste Acceptance Requirements:

- The summary of 40 CFR § 268.44 should be changed to reflect the treatability regulatory language. The regulations state that the hazardous waste cannot be treated "through appropriate technology" may be eligible. "Through reasonable and available means" is not the regulatory standard.

3. Page 3 of 10: Table A. Applicable Treatment Standards for Grout Feed Compliance.

- Footnotes should be added to distinguish between TCLP vs constituent concentrations in Table A i.e. D002, D004, D006, D007 and D011 are TCLP concentrations, while F001 through F005 are constituent concentrations.

4. Page 4 of 10: Figure 1: Grout LDR Management Action Flowchart

- There is no explanation in Section 5.0 regarding the BDAT Assessment & Petition to support this portion of the diagram. Clarify if this is the "equivalent standard" approach under 40 CFR § 268.44.

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5. Page 5 of 10: Section 3.2, LDR Requirements for Grout Treatment and Disposal Units:
 - Clarify which standards will apply for the verification of the treated wastes which will be conducted in accordance with the waste analysis plan (40 CFR §§ 268.7 (b)(1), (2), and (3) and 268.7 (c)(2)).
6. Page 5 of 10, Section 3.3 LDR Requirements for Hazardous Wastes Generated During Grout Operations:
 - Clarify how the decontamination fluids and vault leachate will be treated to meet LDR requirements.
7. Page 6 of 10, Section 5.0, Waste Feed Acceptance Criteria.
 - Clarify the derivation of the waste feed criteria and the metal leach resistance of the final grouted material.
8. Page 7 of 10, Table C: Metal Stabilization Data.
 - All back-calculations to determine waste acceptance criteria must be compared with TCLP and total constituent concentrations in Table A.

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Distribution

J. H. Anttonen	RL	R3-73
B. A. Austin	WHC	B2-35
J. K. Bartz	MACTEC	A4-35
E. J. Bitten	WHC	L4-73
R. C. Bowman	WHC	H6-24
R. C. Brunke	WHC	H6-23
K. C. Burgard	WHC	R4-03
R. M. Carosino	RL	A4-52
G. D. Carpenter	WHC	H6-30
R. Carreon	RL	R3-74
M. S. Cochran	WHC	S1-52
R. E. Cordts	Ecology	
C. E. Clark	RL	A5-15
M. W. Cline	WHC	H6-24
L. P. Diediker	WHC	T1-30
C. K. Disibio	WHC	B3-15
D. L. Duncan	EPA	HW-106
G. D. Forehand	WHC	B2-35
C. J. Geier	WHC	H6-21
W. T. Gretsinger	WHC	R4-01
L. A. Huffman	RL	R3-74
M. Jaraysi	Ecology	
P. J. Mackey	WHC	B3-15
K. S. McCullough	WHC	H4-70
R. J. Murkowski	WHC	R4-02
D. R. Nunamaker	WHC	S4-43
S. M. Price	WHC	H6-23
J. E. Rasmussen	RL	A5-15
S. H. Rifaey	WHC	S6-12
R. K. Sanan	WHC	R4-05
G. H. Sanders	RL	R3-74
S. A. Thompson	WHC	H6-24
H. T. Tilden II	PNL	P7-68
J. A. Voogd	WHC	H5-49
G. F. Williamson	WHC	R4-01
R. F. Wood	WHC	R4-01
G. D. Wright	WHC	R3-10
RCRA FILES/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: Grout Treatment Facility, TD-2-1
[Care of EPIC, WHC (H6-08)]

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Stop HW-106

Please send comments on distribution list to Kathy Knox, WHC (H6-24),
(509) 372-3596.

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