

START

0036204

12

Meeting Minutes Transmittal

222-S LABORATORY COMPLEX
Unit Managers Meeting (Videoconference)
Federal Building, Room 784B
Richland, Washington

December 16, 1993
8:00 a.m. - 9:00 a.m.

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

Not Present _____ Date: _____
Clifford E. Clark, Unit Manager, RL

Daniel L. Duncan Date: 2/14/94
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

_____ Date: _____
Gary Anderson, Unit Manager, Washington State Department of Ecology

222-S Laboratory Complex, WHC Concurrence

Mike J. Hall Date: 3/1/94
Mike J. Hall, 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 - 222-S Laboratory Complex, Status of Project Upgrades



901322116

Attachment 1

222-S LABORATORY COMPLEX
Unit Managers Meeting (Videoconference)
Federal Building, Room 784B
Richland, Washington

December 16, 1993
8:00 a.m. - 9:00 a.m.

- AGENDA -

1. PREVIOUS MEETING MINUTES
2. PROGRAM STATUS
 - Status of project upgrades
3. RCRA TOPICS
 - Closure/Replacement of Storage Modules
 - Submittal of Revision 1
4. GENERAL TOPICS
 - Action items
 - Past action items
 - New action items
 - Schedule of next meeting
 - Tentative dates - (March 1994?)
 - Proposed topics

2014-0226-116

Attachment 2

222-S LABORATORY COMPLEX
Unit Managers Meeting (Videoconference)
Federal Building, Room 784B
Richland, Washington

December 16, 1993
8:00 a.m. - 9:00 a.m.

Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

- The minutes for the April, May, June and September 1993 Unit Managers Meeting have been reviewed and approved. The minutes will be sent to Mr. G. Anderson (Ecology) for signature, and then routed to Mr. D. Duncan (EPA) for signature. There were no Unit Manager Meetings held in July and August 1993.

2. PROGRAM STATUS

- Mr. J. Warwick (WHC) provided the status of project upgrades for the 222-S Laboratory Complex (Attachment 5). With regard to replacement of the 222-S dangerous and mixed waste storage area storage modules, Mr. Duncan asked when the closure plan, the Notice of Intent (NOI), and the revised Part A permit application will be transmitted to Ecology and EPA. Mr. J. Williams Jr. (WHC) stated that the NOI should be sent to Ecology and EPA approximately the first of March 1994, and the Part A permit application would be submitted 150 days after submittal of the NOI.

Mr. Williams proceeded to address Mr. Duncan's inquiry regarding the closure plan, stating that the plan will be attached to a letter and transmitted to Ecology and EPA. Mr. Duncan asked if the closure was covered under the Tri-Party Agreement (TPA), and Mr. Williams stated it was not. Mr. Williams stated that the closure plan will provide a description of how the boxes will be closed out, and include sampling that has been performed and any spill records. Mr. Williams described the closure of the boxes as basically a maintenance change out with state-of-the-art Resource, Conservation and Recovery Act (RCRA) storage boxes. However, WHC is electing to close out the old boxes so they can be used for other purposes. The secondary containment will remain inside the old boxes. Mr. Williams explained that the 222-S lab group had determined that changing out the boxes was more economical than upgrading them, and there were also fire control regulations, among other issues, associated with upgrading the boxes.

Mr. Williams stated that the NOI is being submitted since the new boxes will increase the storage capacity. Mr. Duncan asked if the Part A permit application will reflect the increased storage capacity, and Mr. Williams stated that it would. Mr. M. Hall (WHC)

94-322-400

estimated that the closure plan would be submitted to Ecology and EPA at the end of February 1994.

Mr. Duncan questioned the rationale for submitting a closure plan, and pointed out that the storage modules are being upgraded, but the unit is not being closed. Mr. Williams responded that the Washington Administrative Code (WAC) regulations regarding closure do not provide clear direction for the approach WHC is taking by replacing the boxes, but the WAC does contain regulations for maintenance change out. However, Mr. Williams noted that replacing the boxes does not fall under the WAC regulations for maintenance change out. Mr. Duncan recommended that WHC contact the Kennewick Ecology office and request an interpretation of the WAC regulations. Mr. Anderson stated that he would notify Mr. T. Tebb (Ecology) regarding the regulatory question.

Mr. Duncan asked if a sampling plan and waste analysis plan will be submitted. Mr. Warwick responded that the closure plan is basically a sampling analysis plan, and it describes the methods used for sampling by using process knowledge and adequate sampling of the boxes to determine the boxes are clean.

3. RCRA TOPICS

- **Closure/Replacement of Storage Modules**

This topic was covered in the above-held discussion under Status of Project Upgrades.

- **Submittal of Revision 1**

Mr. Anderson announced that he will no longer be the Ecology unit manager for the 222-S Laboratory Complex as of January 3, 1994. The project is being transferred to the Ecology office in Kennewick, Washington, and Mr. Tebb will be the Ecology contact until a new unit manager is assigned.

Mr. Williams stated that WHC was requesting an extension beyond the August 31, 1994 submittal date for Revision 1 of the Part B permit application since the conceptual design for the project will not be completed for two years. Mr. Williams pointed out that until the conceptual design is completed, if Revision 1 is rewritten it will not contain any new information. Mr. Anderson stated that Ecology could not wait until WHC has a set of plans ready to send to the contractor in order to process permits. Mr. Williams explained that WHC's intent was to submit to Ecology a completed design that had been approved by RL/WHC. Mr. Anderson indicated that he would apprise Mr. Tebb of the situation.

947322-03

4. GENERAL TOPICS

- Action item 9-29-93:2, WHC will send Dan Duncan (EPA) a copy of the outstanding NOD comments that have not been resolved. This action item was closed.
- There were two new action items for WHC. Mr. Williams will set up a meeting with Mr. Tebb, and provide Mr. Duncan a draft schedule regarding the NOI and closure plan for storage boxes.
- The next Unit Managers Meeting was tentatively scheduled for March 1994. The closure plan and project status were two proposed topics for the next Unit Managers Meeting. Mr. Duncan stated that he will be transmitting to RL (Mr. C. Clark) final draft guidance that EPA Region 10 had just received from EPA Headquarters. The documents include mixed waste storage guidance, and mixed waste testing guidance.

014 075 016
94322410

Attachment 3

222-S LABORATORY COMPLEX
Unit Managers Meeting (Videoconference)
Federal Building, Room 784B
Richland, Washington

December 16, 1993
8:00 a.m. - 9:00 a.m.

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Gary Anderson	Ecology	(206) 407-7139
Joan Bartz	MACTEC	(509) 946-3693
Paula Clark	RL	(509) 376-4718
Dan Duncan	EPA	(206) 553-6693
Mike Hall	WHC	(509) 373-5719
Kathy Knox	WHC	(509) 372-3596
Jay Warwick	WHC	(509) 373-3073
Joel Williams Jr	WHC	(509) 376-4782

917221-2216

Attachment 4

222-S LABORATORY COMPLEX
Unit Managers Meeting (Videoconference)
Federal Building, Room 784B
Richland, Washington

December 16, 1993
8:00 a.m. - 9:00 a.m.

Action Items

<u>Action Item</u>	<u>Description</u>
04-21-93:1	Mr. G. Anderson (Ecology) will bring RL's 6-2-92 immiscible phase separation letter to Ecology's attention for a response. ACTION: G. Anderson (Ecology) CLOSED (9-29-93)
09-29-93:1	WHC will transmit a draft letter to Ecology and EPA of the project response to the conceptual design for 219-S. ACTION: J. F. Williams Jr (WHC) OPEN
09-29-93:2	WHC will send Mr. D. Duncan (EPA) a copy of the outstanding NOD comments that have not been resolved. ACTION: J. F. Williams Jr (WHC) CLOSED
09-29-93:3	Ecology will review WHC's request for extension regarding resubmission of the permit application. ACTION: G. Anderson (Ecology) OPEN
12-16-93:1	WHC will set up a meeting with Mr. T. Tebb (Ecology), who will be the new Ecology contact for 222-S. ACTION: J. Williams Jr. (WHC) OPEN
12-16-93:2	WHC will provide Mr. D. Duncan (EPA) a draft schedule regarding the NOI and closure plan for storage boxes. ACTION: J. Williams Jr. (WHC) OPEN

9322112

Attachment 5

**222-S LABORATORY COMPLEX
Unit Managers Meeting
Federal Building, Room 784B (Videoconference)
Richland, Washington**

**December 16, 1993
8:00 a.m. - 9:00 a.m.**

**222-S LABORATORY COMPLEX
STATUS OF PROJECT UPGRADES**

94320.413

#5
222-S
12-16-93

222-S LABORATORY COMPLEX
UNIT MANAGERS MEETING
STATUS OF PROJECT UPGRADES

December 16, 1993

- **Project W-041H Environmental Hot Cell Expansion**

- **Status: On schedule**
Construction is 95% Complete

- **Project W-087 222-S Radioactive Liquid Waste Line Replacement**

- **Status: On schedule**
Definitive design approxiametly 10% Complete

Part of TPA Milestone M-32

January 1997 Start Up date

**Project authorization submitted to DOE for
FY 94 funding.**

- **Project W-178 219-S Secondary Containment Upgrade**

- **Status:** On schedule and awaiting funding.

Part of TPA Milestone M-32

January 1996 set for completion of definitive design.

- **Replace 222-S Dangerous and Mixed Waste Storage Area Storage Modules**

- **Status:** Bid will be awarded for purchase of storage modules by end of December.

- **NEPA has been evaluated**
- **Closure plan has been drafted**
- **Notice of Intent to expand storage capacity**
- **Submit revised Part A, Form 3**

Distribution:

G. Anderson	Ecology	
B. A. Austin	WHC	B2-35
J. K. Bartz	MACTEC	B1-42
M. L. Bell	WHC	T6-16
R. C. Bowman	WHC	H6-24
S. L. Brey	WHC	T6-12
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
P. K. Clark	RL	A5-21
D. L. Duncan	EPA	HW-106
J. G. Francik	WHC	T6-12
M. J. Hall	WHC	T6-07
J. M. Hennig	RL	A5-21
P. J. Mackey	WHC	B3-15
A. G. Miskho	WHC	H6-30
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
G. J. Warwick	WHC	T6-12
J. F. Williams Jr.	WHC	H6-24

ADMINISTRATIVE RECORD: 222-S Laboratory Complex, TS-2-1
[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
Stop HW-106 (Records Center)

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

947225-117