

0048453

Meeting Minutes Transmittal - Approval

Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
Federal Building, Room 590A
Richland, Washington

Meeting Held November 6, 1997
From 2:30 PM to 3:30 PM



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

Ellen M. Mattlin Date: 12/4/97
Ellen M. Mattlin, Project Manager, RL

Jeanne J. Wallace Date: 12/4/97
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

300 Area WATS, Contractor Concurrence

Scott N. Luke Date: 12/4/97
Scott N. Luke, Permitting Contractor Representative, WMH

Ivan L. Metcalf Date: 12/4/97
Ivan L. Metcalf, Facility Contractor Representative, BWHC

Not present
Date: _____
F. A. Ruck, Project Hanford Management Contractor Representative, FDH

Purpose: Discuss Permitting Process

- Meeting Minutes are attached. The minutes are comprised of the following:
- Attachment 1 - Meeting Agenda
 - Attachment 2 - Summary of Discussion and Commitments/Agreements
 - Attachment 3 - Attendance List
 - Attachment 4 - Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments

Attachment 1

**Project Managers Meeting
300 AREA WASTE ACID TREATMENT SYSTEM
Federal Building, Room 590A
Richland, Washington**

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Agenda

1. Approval of Past PMM Minutes
2. Status PMM Action Items
3. Closure Activities
 - Closure Plan Approval (DOE/RL-90-11, Rev 1)
 - NOD response resolution
 - Status transition discussions
 - Status Phase 1 closure activities (313 Building)
 - Phase 2 Closure approval
4. New Business
5. Schedule Next Closure Plan Approval Workshop
6. Schedule Next Project Managers Meeting

Attachment 2

**Project Managers Meeting
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Summary of Discussion and Commitments/Agreements

1. Approval of Past PMM Minutes

The October WATS PMM minutes were approved by the RL and Ecology Project Managers.

2. Status PMM Action Items

None

3. Closure Activities

• Closure Plan Approval (DOE/RL-90-11, Rev 1)

NOD response resolution. WMH (Luke) and BWHC (J. Remaize and J. Rich) met with Ecology (Ms. Greta Davis) October 8 and 14 at Ecology's Kennewick office to discuss 11 open NODs that seemed resolvable through the workshop process. Of these 11, Ecology agreed to close NODs 14, 39, 45, 60, and General Comment G-1.a. Attachment 4, **Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments**, will be updated to reflect closure of these NODs. Closure plan text changes necessary to close the remaining NODs were discussed at these meetings and will be provided to Ecology after RL review.

Status of RL Program discussions on soil transition to CERCLA. RL (Mr. Mark Hahn) indicated that a meeting of the two RL programs affected by WATS soil/infrastructure transition issues, Transition Projects Division (TPD) and Restoration Projects Division (RPD), was scheduled for October but did not occur. Ecology (Davis) asked if another meeting had been scheduled. RL (Hahn) was looking into rescheduling the meeting and would invite Cliff Clark of RL/EAP to help facilitate the process. Mr. Hahn indicated that he would be out of the office much of November making a meeting of the two RL divisions less likely in November.

- **Status Phase 1 Closure Activities (313 Building)**

On October 7, 1997, Ecology walked-down WATS closure areas of the 313 Building. At that time, Ecology verbally concurred that the closure activities had achieved the objectives of clean closure of this location from 'the floor up' with regard to contamination from RCRA operations. WMH (Luke) indicated that RL would look forward to written confirmation from Ecology. Ecology (Davis) indicated that written confirmation would be provided later this month.

BWHC (Remaize) informed Ecology that a letter would be forthcoming requesting that RCRA inspections be reduced from weekly to bi-annual (twice-yearly) at WATS portions of the 313 Building.

- **Phase 2 Closure approval**

Approval workshops. Workshops to resolve Ecology informal comments on the [Draft] Phase 2 Closure Decontamination and Inspection Plan (DIP), HNF-SD-ENV-AP-003, Rev. 0, were held at the Ecology's Kennewick office October 14 and 28. At the October 28 meeting, Ecology was presented text changes agreed to at the October 14 meeting and concurred with issuance of the DIP. The document is now in final tech-edit.

334-A Tank Pit decontamination. Decontamination of the 334-A Building Tank Pit surface coating instead of removing the coating by scabbling was discussed. WMH (Luke) indicated that the facility is searching for information identifying the extent of original surface coating decontamination before application of the epoxy coating in 1987. If it can be shown that the original coating was aggressively decontaminated before application of the coating in 1987, then removal of all coatings may not be necessary. Ecology would be provided results of the surface coatings investigation as it affects the Tank Pit decontamination method and the Phase 2 DIP.

Ecology (Ms Jeanne J. Wallace) asked if surface decontamination in lieu of scabbling would represent a cost savings. WMH (Luke) responded that even without exact figures at hand, it could safely be said that surface decontamination would represent a significant cost saving over scabbling. The need for scabbling may also affect how the tanks are dispositioned.

334-A Building tanks. Ecology (Ms. Wallace) asked why the tanks in the 334-A Building Tank Pit were to remain after closure. WMH (Luke) indicated that the entire 300 Area will remain an industrial usage area for the foreseeable future. Consequently, meeting the WAC 173-303-610 closure performance standard of 'return of the land to the appearance and use of surrounding areas' would not require tank removal. BWHC (Remaize) indicated that once the tanks are decontaminated and no longer regulated with regard to RCRA dangerous waste, they could safely remain until the entire building is removed as low-level waste during future D&D activities. Further, allowing the tanks to remain would eliminate the cost of modifying the building to remove the tanks whole or the cost of cutting up the tanks for removal through the door.

Phase 2 DIP document number change. Ecology was informed that the document number for the Phase 2 DIP would be changed from HNF-SD-ENV-AP-003, Rev. 0, to an as yet unidentified number because a new document numbering system is now in use and document control will not issue revision 0 documents under the old number.

4. New Business

None

5. Schedule Next Closure Plan Approval Workshop

The next closure plan approval workshop was set for November 12, 1997 at Ecology's Kennewick office at 8:00 AM. The meeting would be dedicated to presenting Ecology with closure plan text changes and NOD Response Table changes agreed upon during October closure plan approval workshops.

6. Schedule Next Project Managers Meeting

The next 300 Area WATS PMM was scheduled for December 4, 1997.

Attachment 4

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Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments

Table of Closed 300 Area WATS Closure Plan Notice of Deficiency (NOD) Comments

As of September 11, 1997

NOD No.	Closed (X ¹)	NOD No.	Closed (X)	NOD No.	Closed (X)
1	X	26	X	51	
2		27	X	52	
3		28		53	
4	X	29	X	54	X
5		30	X	55	X
6	X	31	X	56	X
7	X	32	X	57	X
8	X	33		58	
9	X	34		59	X
10		35		60	X
11		36	X	61	
12		37	X	G-1.a	X
13	X	38	X	G-1.b	
14	X	39	X	G-1.c	
15		40	X		
16		41	X		
17		42	X		
18		43	X		
19		44	X		
20	X	45	X		
21	X	46	X		
22	X	47	X		
23	X	48	X		
24	X	49	X		
25	X	50	X		

* Notes: X indicates the NOD is closed by Ecology acceptance of the comment response and any associated closure plan text changes.

Distribution:

R. C. Bowman	WMH	H6-24
G. P. Davis	Ecology	B5-18
R. X. Gonzalez	RL	R3-79
M. R. Hahn	RL	R3-79
S. N. Luke	WMH	H6-24
E. M. Mattlin	RL	A5-15
I. L. Metcalf	BWHC	L6-26
J. A. Remaize	BWHC	L6-26
J. W. Rich	BWHC	L6-26
F. A. Ruck	FDH	H6-22
J. M. Steffen	BWHC	N1-47
J. J. Wallace	Ecology	B5-18
T. A. Wooley	Ecology	B5-18
Field File Custodian	WMH	H6-08
RCRA File	WMH	H6-23

ADMINISTRATIVE RECORD: 300 Area Waste Acid Treatment System Closure Plan,
TS-3-1 [Care of EDMC, FDH (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Hanford Files,
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Please send comments on distribution list to Scott Luke (H6-24),
(509) 372-1667.