

0052682

Meeting Minutes Transmittal

**T Plant Project Meeting
Ecology Interface Meeting
2430 Stevens/Room 297
Richland, Washington
January 27, 2000
12:00 p.m. to 1:00 p.m.**

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EDMC

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

Jeanne J. Wallace
Jeanne J. Wallace, Project Manager, Ecology

Date: 2/24/2000

Gregory Sinton
Gregory Sinton, Project Manager Representative, RL

Date: 2-24-00

T Plant Project Meeting, FH Concurrence

CK Girres
Cynthia K. Girres, Project Manager Representative, FH WMP

Date: 2-24-00

T PLANT PROJECT MEETING
2430 Stevens/ Room 297
Richland, Washington

January 27, 2000
12:00 p.m. to 1:00 p.m.

Agenda

1. Approval of past T Plant minutes. (Ecology/DOE-RL/FDH)
2. Operational Status (Chris Haas)
3. Project Specific Issues (Chris Haas)
 - A. 221-T Tank System Closure Plan (Scott Luke)
4. General Discussions (Chris Haas)
5. Status of Action Items
6. New Action Items
7. Next Project Manager's Meeting

T Plant Project Meeting Minutes
2430 Stevens/Room 297
Richland, Washington

January 27, 2000
12:00 p.m. to 1:00 p.m.

- I. FY 2002 Draft WM PPL (Ken Quigley)
 - A. As part of the Project Managers Meeting, Ken Quigley gave a presentation on the budget data through FY 2002 that included all projects. A handout was provided and is included in the minutes.

- II. Approval of December 16, 1999 T Plant Project Meeting Minutes (Ecology/DOE-RL/FH)

- III. Operational Status
 - A. Brett Barnes gave an overview of December 1999 production at T Plant.

- IV. Project Specific Issues
 - A. Scott Luke gave a presentation on 221-T Tank System Closure Status and Issues. Due to the new mission of the 221-T canyon, closure constraints due to the tank system being located in a 'canyon' facility, as well as changes in personnel, the previous approach for closure may not be appropriate and further discussion is warranted. It was suggested that Ecology not review the closure outline and that a meeting be scheduled to discuss a new approach and schedule. This recommendation was agreed to by all parties.
 - B. Ecology requested the sample log/analytical data and volume of sludge for waste inventory for 221-T.

- V. Status of Action Items
 - A. SWT-99-003 was cancelled due to change in path forward.
 - B. SWT-99-005 remains open.

- VI. New Action Items
 - A. SWT-00-001 – A tour of T Plant was scheduled for Ecology for March 7, 2000.
 - B. SWT-00-002 – An action to provide Greta Davis (Ecology) a cross-cut view of 221-T canyon and a video of the canyon was accepted by the facility.
 - C. SWT-00-003 – An action to schedule a workshop for 221-T was accepted by the facility.
 - D. SWT-00-004 – An action to provide Ecology with volume of sludge for waste inventory and sample log/analytical data for 221-T was accepted by the facility.

VII. Next T Plant Project Meeting

- A. It was agreed that the Project Managers Meeting would be moved from the third Thursday of the month to the fourth Thursday of the month. Next meeting is scheduled for February 24, 2000.**

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221-T Tank System Closure

Status and Issues



1/27/00

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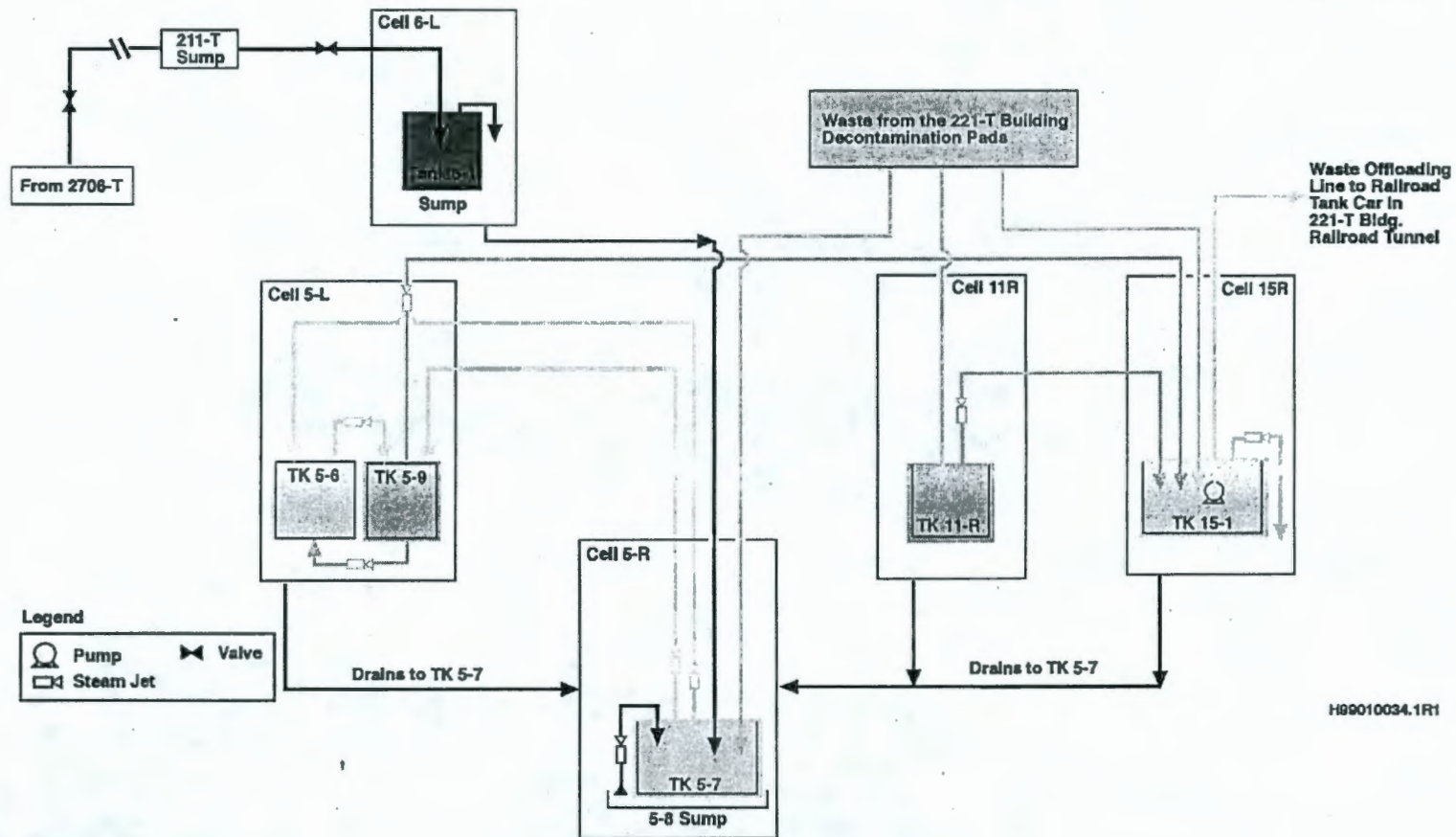
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221-T Tank System

- **Tank System Description**

- 221-T Tank System is a portion of T Plant Complex (T Pant), an operating, interim-status TSD unit. T Plant is scheduled to go Final Status via inclusion into the Hanford Facility RCRA Permit during Mod H, 2002.
- Tank system is a comprised of 6 interconnected stainless steel tanks dating from 1940's located in the 221-T Building and 1 concrete sump outside 221-T.
 - Tank 15-1 is open-top, 14,000 gallon tank in cell 15R with steel cover
 - Tank 5-7 is open-top, 16,000 gallon tank in deep, uncovered cell 5R (cell bottom has no drain and forms Sump 5-8).
 - Tank 5-6 is a closed 5,100 gallon tank in cell 5L with coverblock
 - Tank 5-9 is closed 4,800 gallon tank in cell 5L with coverblock
 - Tank 6-1 is open-top, 14,500 gallon tank in cell 6L with coverblock
 - Tank 11R is open-top, 14,000 gallon tank in cell 11R with coverblock
 - 211-T Sump is a 1,000 gallon covered concrete sump in the ground between 221-T and 2706-T

221-T Tank System



1/27/00

221-T Tank System

- **Tank System Description (continued)**
 - Tank system currently contains approximately 25,000 gallons of sludge and liquid mixed waste that is listed waste and is also TSCA-regulated.
 - Liquid is constantly evaporating from the open tanks to the controlled 221-T Building atmosphere that vents through a regulated stack.
 - The tank system is non-RCRA-compliant, can't be upgraded, and has been permanently isolated from further waste additions under Project W-259.
 - 221-T is identified in the T Plant Part A as a containment building.
 - 221-T is a 'canyon' type facility that is also a "Candidate Key Facility" for future decommissioning under Section 8.0 of the Tri-Party Agreement (*Long-Term Facility Decommissioning Plan*, DOE/RL-96-0046).

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221-T Tank System

- **Closure Regulations**

- RCRA requires closure under WAC 173-303-610 within 180 days of last receipt of waste **and** in accordance with the approved closure plan.
- However, no approved closure plan currently exists.
- WAC 173-303-610 (4)(b) allows a justifiable extension of the closure period.
- Alternatively, Hanford Site closures have deferred WAC 173-303-610 closure requirements to coordination with future equivalent program actions (i.e., CERCLA and TPA, Section 8.0 decommissioning process)

- **Current Tank System Safety Concerns**

- Risk to the public and environment are already minimal by tanks being in a controlled, operating TSD, in a containment building in the remote 200 Area.
- Liquid mixed waste presents limited risk to workers from potential release to the 221-T Liquid Collection System (LCS).
- Tank sludge presents a secondary worker concern due to high radioactivity.

221-T Tank System

- **Closure Constraints**

- The 221-T ‘canyon’ imposes significant structural, radiological, operational and budgetary constraints on closure.
- Building structure and tank design limits access to tanks, components, and containment for decontamination or removal.
 - Tanks were form-fitted into cells making containment and tank exteriors inaccessible without tank removal.
 - Some tanks have only small access ports.
 - Waste transfer piping is imbedded in concrete.
 - The LCS that acted as a waste transfer header is made of vitrified clay and is embedded in concrete so is not accessible or amenable to decontamination.
 - High radiation dose rates in tanks and cells present significant ALARA concerns for worker radiological exposure.

221-T Tank System

- **Closure Constraints (continued)**
 - Liquid mixed waste and sludge is TSCA-regulated and cannot be removed because there is no current PCB management pathway.
 - Large scale closure activities would conflict with normal TSD unit operations and with the new, high-priority mission for 221-T as storage location for K-Basins sludge.
 - No funding is currently available for closure - funding is dedicated to TSD operations and tank system shutdown that mitigates safety concerns (I.e., achieving a safe and stable condition).

221-T Tank System

- **Observations/Conclusions**

- Given closure constraints, RCRA closure of this tank system in accordance with WAC 173-303-610 is **not achievable**.
- In light of minimal risk posed by this tank system, even limited closure activities could be considered unjustified and prohibitive in dollars and dose.
- A RCRA closure plan submitted under these conditions (i.e., cannot achieve and verify a RCRA closure level or closure performance standards) could be difficult to approve.
- Difficult to justify spending limited resources on RCRA closure activities in a building that will be addressed under the Section 8.0 decommissioning process when:
 - Section 8.0 establishes less stringent requirements than RCRA closure - typical Section 8.0 transition phase endpoints are establish 'low risk and low maintenance' conditions.
 - RCRA closure activities could be inconsistent with the Section 8.0 future facility disposition.

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221-T Tank System

- **Needed**

- A regulatorily sound alternative to tank system closure under WAC 173-303-610 because such closure is **not achievable** in a canyon facility until the entire facility is dispositioned.

221-T Tank System

- **RL Actions To-date**

- RL has requested a closure extension to allow formulation of a comprehensive tank system disposition strategy (99-EAP-425).
- Ongoing efforts to disposition tank waste and answer closure questions:
 - Tank system has been isolated from further waste additions.
 - Liquids and sludge have been sampled to assist waste disposition.
 - Liquid waste removal and treatment methods to address TSCA concerns are being investigated.
 - Sludge disposition method(s) are being investigated.
 - Management of tanks and components to minimize risk, cost, and maintenance.
 - Investigating other possible legal avenues to tank system disposition as alternative(s) to WAC 173-303-610 closure.

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221-T Tank System

- **Important point**

- Pursing a comprehensive approach to disposition a tank system in a ‘canyon’ facility that meets all parties needs is within the spirit and intent of the Tri-Party Agreement to:

- **Save money** that can be redirected to higher priority work by avoiding activities of questionable benefit to human health and the environment.
- Ensure **consistency of cleanup** and **no duplication of effort** between RCRA closures and final decommissioning processes.

221-T Tank System

- **Proposal**

- Schedule a **workshop** for February to:

- Answer questions and provide any requested information on closure constraints (budget, tank waste disposition, tank system stabilization)
- Identify and address regulatory needs and appropriate documentation in light of the limitations placed on closure.
- Status RL's pursuit of a comprehensive approach for tank system disposition.
- Set a date for RL to meet with Ecology to identify and discuss tank system disposition strategy and appropriate documentation.

T Plant (Solid Waste Treatment) Project Managers Meeting Action Tracking Matrix

TRACKING NUMBER	DATE	FACILITY/UNIT	ACTION	ACTIONEE	DUE DATE (Target (T) /Mandatory (M))	OPEN/CLOSED
SWT-99-001	10/21/99	T-Plant	Reschedule tour. A tour is scheduled for December 8, 1999.	C. Haas	November (T)	Closed
SWT-99-002	10/21/99	T-Plant	221-T Tank System closure - Issue response to Aug. 2, 1999 letter and extend date for draft submittal. Joan sent a letter in October, 1999.	Ecology	10/31/99 (M)	Closed
SWT-99-003	10/21/99	T-Plant	Provide comments on 221-T Tank System Closure Plan outline. Jeanne Wallace will check status of comments. Revised due date will be determined in meeting referenced in SWT-99-004. Ecology will review previous letters to determine if another letter is required.	Ecology	No longer applicable based on change in path forward.	Cancelled
SWT-99-004	10/21/99	T-Plant	Schedule meeting to resolve comments (if necessary) on 221-T Tank System Closure Plan. Ecology agreed to provide informal comments and there will be a meeting to resolve them so that when plan is submitted, it won't be rejected. Currently waiting for Ecology to come back with comments. Brett would like to have a meeting before-hand and will contact Greta to schedule. A meeting will be scheduled in January to discuss the issue.	C. Haas	January (T)	Closed

			Part A - Rescind letter requiring split of 2706-T and 221-T. Chris will send Jeanne original letter and packet of all related material. Jeanne will then issue a rescind letter. A meeting will be held with Ecology in January to provide status. Jeanne will review previous correspondence to determine if another letter is required. (The issue will be discussed at the meeting referenced in SWT-99-004)			
SWT-99-005	10/21/99	T-Plant		Haas	TBD	Open
SWT-00-001	1/27/00	T-Plant	Provide tour of T Plant for Ecology (Greta Davis).	Haas	March 7, 2000 (T)	Open
SWT-00-002	1/27/00	T-Plant	Provide Ecology (Greta Davis) with a cross-cutting view of 221-T and a video on canyon.	Haas	February (T)	Open
SWT-00-003	1/27/00	T-Plant	Schedule workshop for 221-T.	Haas	March (T)	Open
SWT-00-004	1/27/00	T-Plant	Provide Ecology (Davis/Bartz) with volume of sludge for waste inventory and sample log/analytical data for 221-T.	Haas	February (T)	Open

T-Plant Project Meeting

ECOLOGY INTERFACE MEETING

2430 Stevens / Room 297

Richland, WA

January 27, 2000

9:00 am - 1:00 pm

<u>Name</u>	<u>Organization</u>	<u>Phone Number</u>
Julie Witt	FH	372-0300
Joanne Wallace	Ecology	736-3019
Greta Davis	Ecology	736-3025
Ellen Degan	DOE-ORL	376-3811
Todd Shrader	RL-WMD	376-2725
Brett M Barnes	FH	376-3640
Joan K. Sartz	Ecology	736-5907
Tony McRarns	DOE-OSS	376-8981
Rick Engelmann	FH-Enviro. Services	376-7485
Michael Collins	RL-WMD	376-6536
Greg SINTIN	RL-WMD	373-7928
Cindy Girres	FH	373-3511
ROB P/POD	FH	373-3285
Bill Ayers	WMP	373-1580
Scott Luke	ES/PED	372-11067

**WASTE MANAGEMENT
FY 2002 PPL**

COA TITLE	FY 2000 Baseline	FY 2001	FY 2002
	FY00	FY01	FY02
Solid Waste Storage/Disposal Essential Safety	10,861,478	12,051,606	10,733,562
Solid Waste Treatment Essential Safety	24,322,391	25,740,526	24,046,884
200 LEF Essential Safety	28,840,567	29,972,272	19,383,085
300 LEF Essential Safety			
Analytical Services Essential Safety	24,965,019	27,809,010	25,280,935
Program Management Min Safe	13,319,404	14,329,494	14,550,604
SUB-TOTAL MINIMUM SAFE	102,308,859	109,902,908	93,995,070
WMP SAFEGUARDS & SECURITY	0	5,369,280	5,711,680
Waste Management Steam Assessment	778,426	1,668,295	1,686,383
Waste Management Laundry Assessment	378,485	387,273	385,709
Waste Management Fee Assessment	6,411,000	6,411,000	7,045,000
SOLID WASTE STORAGE/DISPOSAL (Pool Cost)	0	0	2,817,204
ANALYTICAL SERVICES (Pool Cost)	0	0	8,406,439
Solid Waste Storage/Disposal Essential Services	30,005	205,987	1,679,581
Solid Waste Treatment Essential Services	2,590,379	8,580,254	10,076,616
Analytical Services Essential Services	0	0	723,157
POLLUTION/WASTE MIN COORDINATION	0	0	1,248,000
POLLUTION/WASTE MIN ROI	0	0	1,040,000
CANYON DISPOSAL INITIATIVE (CDI)	0	0	260,000
SUB-TOTAL ESSENTIAL SERVICES	112,497,154	132,524,996	135,074,839
SUB-TOTAL TARGET	112,497,154	128,900,000	
M-91 TRU Compliance Activities	0	1,959,064	3,807,388
M-91 RMW Compliance Activities	0	0	0
300 LEF Compliance Activities	0	745,892	0
SUB-TOTAL COMPLIANCE ACTIVITIES	112,497,154	135,129,953	138,882,227
RMW Treatment	0	9,560,259	3,062,831
Solid Waste Treatment Essential Services (Unfunded Portion)	0	3,109,034	0
Solid Waste Storage/Disposal Essential Services (Unfunded Portion)	0	1,175,183	0
200 LEF Essential Services (Unfunded Portion)	0	198,357	602,748
Analytical Services Essential Services (Unfunded Portion)	0	2,286,444	1,407,714
Solid Waste Facilities Life Extension/Upgrade	0	582,406	425,973
Solid Waste Treatment Life Extension/Upgrade	0	1,559,430	500,749
200 LEF Life Extension/Upgrades	0	3,912,000	1,243,261
Analytical Services Life Extensions/Upgrades	0	6,827,770	5,017,059
WM GRAND TOTAL	112,497,154	164,440,836	151,142,560
WESF MIN SAFE	11,179,154	10,222,300	10,369,466
WESF STEAM	349,000	774,180	806,000
WESF LAUNDRY	0	0	104,000
WESF FEE	1,049,000	1,147,000	596,000
WESF RL-REQUIREMENTS	629,000	332,520	0
SUB-TOTAL	13,206,154	12,476,000	11,875,466
SUB-TOTAL TARGET	13,206,000	12,476,000	
WESF UPGRADES	0	2,185,416	1,922,015
WESF GRAND TOTAL	13,206,154	14,661,416	13,797,480
COMBINED GRAND TOTAL	125,703,308	179,102,253	164,940,040

Meeting Minutes Transmittal

**T Plant Project Meeting
Ecology Interface Meeting
2430 Stevens/Room 297
Richland, Washington
January 27, 2000
12:00 p.m. to 1:00 p.m.**

Purpose: Discuss operational status and current permitting issues.

Meeting Minutes are attached. The minutes consist of the following:

Agenda

Summary of Discussion and Commitments/Agreements
Operational Status Report
Attendance List
Information Tracking log
221-T Tank System Closure Status and Issues Handout
Waste Management FY 2002 PPL Handout

Distribution:

Greg Sinton	RL	S7-55
Cindy Girres	FDH	T3-01
Jeanne Wallace	Ecology	B5-18
Julie Stitt	FDH	T3-01
Brett Barnes	FDH	T4-04
Michael Collins	RL	A5-18
Chris Haas	FDH	T3-28
Todd Shrader	RL	R3-81
Rob Piipo	FDH	A1-14
Scott Luke	FDH	G1-30
David Holland	Ecology	B5-18
Greta Davis	Ecology	B5-18
Joan Bartz	Ecology	B5-18
Bob Barmettlor	WMH	T3-28
Rick Engelman	WMH	G1-30
Edward Aromi, Jr.	WMH	H6-10
Terry Moore	WMH	G1-32
Janice Williams	FDH	H8-67
Richard Gurske	WMH	G1-37
Ellen Dagan	RL	A5-15
Tony McKarns	RL	A2-15
Bill Ayers	WMH	T3-28
Scott Luke	FH	G1-30

Administrative Record - T Plant [Care of EDMC, LMSI (H6-08)]