

Meeting Minutes – Approval

Issue Resolution Workshop

For

T Plant Complex Part B Permit Application – Working Draft

2355 Stevens, Conference Room 203

Richland, Washington

Meeting Held October 4, 2000

From 2:00 to 4:00 PM

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

Greg Sinton Date: 10/31/00
Greg Sinton, Project Manager Representative, RL/WMD

Greta Davis Date: 12-12-00
Greta Davis, Unit Manager/Permit Writer, Washington State Department of Ecology

T Plant Complex - Contractor Concurrence

Brett Barnes Date: 11/30/00
Brett Barnes, Environmental Compliance Officer, T Plant Complex, FH/WMP

Not Present

_____ Date: _____
Cindy Girres, Waste Management Project Office, FH/WMP

Scott N. Luke Date: 10/8/00
Scott N. Luke, Permitting Representative, FH/ES

Purpose: Determine content of T Plant Complex Part B Permit Application

The attached minutes are comprised of the following:

Attachment 1 - Meeting Agenda

Attachment 2 - Summary of Discussion (Commitments/Agreements)

Attachment 3 - Attendance List

Attachment 4 - Action Items

Attachment 5 - DRAFT 221-T Tank System Closure Approval Letter

Distribution:

B. M. Barnes	FH	T3-28
M. S. Collins	RL	H0-12
R. M. Engelmann	FH	G1-30
G. P. Davis	Ecology	B5-18
C. K. Girres	FH	T3-01
F. C. Jamison	Ecology	B5-18
S. N. Luke	FH	G1-30
E. M. Mattlin	RL	A5-15
G. L. Sinton	RL	H0-12
T. A. Shrader	RL	H0-12

ADMINISTRATIVE RECORD: T Plant Complex [Care of EDMC, LMSI (H6-08)]

Please send comments on distribution list to Scott Luke (G1-30), (509) 372-1667.

Attachment 1

**Issue Resolution Workshop
For
T Plant Complex Part B Permit Application – Working Draft 1**

**2355 Stevens, Conference Room 203
Richland, Washington
Meeting Held October 4, 2000
From 2:00 to 4:00 PM**

Agenda

- 1. Workshop Process**
 - Approval of past workshop minutes
- 2. WD-1 Review Status/Activities**
 - 221-T Tank System closure approval letter
 - Chapter 11.0 comment responses
 - Discuss comments/issues
- 3. Workshop Action Items**
 - Discuss open Action Items
 - Action Item #7 (K Basin sludge reactivity)
- 4. Date of Next Workshop**

Attachment 2

Issue Resolution Workshop For T Plant Complex Part B Permit Application – Working Draft 1

2355 Stevens, Conference Room 203
Richland, Washington
Meeting Held October 4, 2000
From 2:00 to 4:00 PM

Summary of Discussion and Commitments/Agreements

1. Workshop Process

- **Approval of past workshop minutes**
The minutes from the September 27, 2000 workshop were not ready for review.

2. WD-1 Review Status/Activities

- **221-T Tank System closure approval letter**
The initial draft of a letter requesting Ecology approval of the proposed approach for closure of the 221-T Tank System and for managing the waste currently in the tanks was provided to Ecology (Attachment 5). Because this was an initial draft, Ecology involvement in forging a final version of the letter was encouraged. Ecology (Greta Davis) indicated that the letter will be presented to Ecology management and comments will be provided at the next workshop.
- **Chapter 11.0 comments**
 - A general review of the Chapter 11.0 comments provided by Ecology at the September 27, 2000 workshop occurred to ensure that each Ecology concern and the proposed response was properly captured. Because the September 27, 2000 meeting minutes are still in-process, any changes to the comments or responses will be captured in those minutes.
 - Chapter 11.0 was electronically submitted to Ecology August 25, 2000 for inclusion into the T Plant Complex Part B, WD-1. This chapter will be formally transmitted to Ecology by RL letter. Until then, formal submittal of Chapter 11.0 will be tracked as new **Action Item 8**.
- **New Ecology comments/issues**
None

3. Workshop Action Items

- **Discuss open Action Items**
 - **Action Item #7** (reactivity of dry K Basin sludge): FH (Joel Williams) indicated that the K Basin sludge will not be reactive when dry. However, the sludge in canisters will be kept wet for radiological control and to ensure that sludge can be readily sluiced from the canisters at the time of treatment. Ecology expanded its concern to include whether the sludge would be ignitable if dry. FH (Joel Williams) will pursue analytical data (if any) that would indicate whether the sludge would be reactive and/or ignitable if dry.

4. Date of Next Workshop

- The next workshop was scheduled for October 18, 2000 at the same time and location.

Attachment 4

**Issue Resolution Workshop
For
T Plant Complex Part B Permit Application – Working Draft 1**

**2355 Stevens, Conference Room 203
Richland, Washington
Meeting Held October 18, 2000
From 2:00 to 4:00 PM**

Action Items List

<u>Action Item #</u>	<u>Responsible Party</u>	<u>Description</u>	<u>Date Closed</u>
1	Fluor Hanford (Brett Barnes)	Provide a preliminary draft of the T Plant Complex Part A, Form 3, for discussion at the July 26, 2000 workshop.	<i>Provided to Ecology 7/26. Will be closed when transmitted by RL letter.</i>
2	Fluor Hanford (Brett Barnes/Scott Luke)	Inform Ecology of the height of 214-T berm.	Closed August 9, 2000
3	Fluor Hanford (Brett Barnes/Scott Luke)	Inform Ecology of the types of 'alternative' packaging referenced in the subject text and under what conditions such packaging would be used.	Closed September 27, 2000
4	Fluor Hanford (Brett Barnes/Scott Luke)	Identify to Ecology how an individual entering the plant can know the number and location of current operations logbooks.	Closed September 27, 2000
5	Fluor Hanford (Brett Barnes/Scott Luke)	Provide Ecology with Chapter 3.0, Waste Acceptance Plan, for WD-1 of the T Plant Complex Part B Permit Application.	<i>Open</i>
6	Fluor Hanford (Brett Barnes)	Provide Ecology with information on T Plant Complex WIDS sites.	Closed September 27, 2000
7	Fluor Hanford (Joel Williams)	Identify to Ecology whether the K Basin sludge that will be stored in canisters at T Plant Complex would become reactive or ignitable if allowed to dry.	<i>Open</i>
8	Fluor Hanford (Barnes, Luke)	Transmit Chapter 11.0 to Ecology by RL letter for inclusion into WD-1 of the T Plant Complex Part B Permit Application.	<i>Open</i>

**New = action item assigned at this meeting*

Attachment 5

DRAFT 221-T Tank System Closure Approval Letter

To: F. C. Jamison, Manager

State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336

DRAFT

REQUEST TO FORMALIZE 221-T TANK SYSTEM CLOSURE AGREEMENT

This letter documents the proposed approach for closure of the 221-T Tank System, identifies the proposed management method for the waste currently in the tanks, and requests the State of Washington, Department of Ecology (Ecology) approval of these methods.

The 221-T Tank System is a Resource Conservation and Recovery Act of 1976 (RCRA) Tank System. The waste currently in these tanks is comprised of liquids and sludge that contain mixed waste constituents and also contain polychlorinated biphenyls (PCBs) at levels regulated under Toxic Substances Control Act of 1976 (TSCA). Although located within the RCRA-permitted 221-T containment building, secondary containment for this tank system does not meet the RCRA and TSCA requirements for storage of liquids. Tanks are open-topped and ventilated to controlled canyon atmosphere so liquids will naturally evaporate from the system by calendar year 2005 at which time storage can be considered substantially RCRA and TSCA compliant.

No management pathway currently exists for this radioactive waste. The tank waste has been shown to pose little risk to human health and the environment in its current storage configuration. Consequently, the 221-T Tank System closure and management of the waste in the tanks is proposed to occur as follows:

“The 221-T Tank System will remain in-place and tank waste will remain in the system and monitored until final tank system closure in coordination with future 221-T ‘canyon’ disposition. Tank system closure and management of tank waste in this manner will be documented in Chapter 11.0 of the T Plant Complex Part B Permit Application.”

The tank system closure approach and justification for continued management of the waste in the current manner has been presented to Ecology and the U.S. Environmental Protection Agency (EPA) on March 22, 2000, and was also provided in Chapter 11.0, Closure Plan of the “Hanford Facility Dangerous Waste Part B Permit Application, T Plant Complex, Working Draft (DOE/RL-95-36).

DRAFT

In accordance with Tri-Party Agreement (TPA) Milestone M-32-03-T03, the 221-T Tank System received its final volume of mixed waste in June 1999. This action initiated the need to begin closure activities. In August 1999, a demonstration to delay closure in accordance with Washington Administrative Code (WAC) 173-303-610 (4)(c) was submitted to Ecology to identify 221-T Tank System closure constraints (99-EAP-425). The basis for this demonstration was that significant structural, radiological as low as reasonably achievable (ALARA), and budgetary constraints presented by the canyon structure prevented tank system closure from being completed until canyon disposition. Further, tank waste cannot be removed from the system at this time because no reasonable treatment, storage, or disposal pathway exists. Current analytical data indicates that the 221-T RCRA Tank System waste, both liquids and sludge portions, are stable (incompatible, reactive, or ignitable wastes were not added to the tank system). Because these tanks and residues pose little risk to human health and the environment, Ecology is being requested to agree that the tanks and the waste residues remain in place and be monitored until final tank system closure in conjunction with the 221-T canyon disposition.

The tank system and the current liquid waste inventory and future dry residues pose minimal and declining risk to human health and the environment and is cost-effective because:

- The 221-T Tank System is located in a containment building within an operating RCRA TSD unit that is located in the remote 200 Area of the Hanford Site
- The 221-T Tank System is not leaking as shown by liquid level monitoring
- The risk of tank spills will decline to nonexistent as the quantity of liquids diminishes through natural evaporation (evaporation is estimated at approximately 8 gallons per day)
- Facilitates ALARA by eliminating radiological and chemical exposures from waste removal and treatment activities
- Will ensure minimal exposure during tank system monitoring until final closure
- Performing closure activities would interrupt the proposed, accelerated schedule for storage of K-Basins sludge in the 221-T Canyon
- Saves \$6.2 to \$9.3 million over the cost of alternative closure activity options without added risk to human health or the environment
- Ensures consistency of Hanford Site cleanup actions by coordinating final tank system closure with future 221-T canyon disposition initiatives (e.g., Canyon Disposal Initiative, Section 8.0 decommissioning process)

EPA approval in accordance with Title 40, Code of Federal Regulations (CFR) 761.61 (c) is necessary to store PCB remediation waste in a safe, controlled, but non-TSCA compliant manner. A Risk-Based approval will be sought from EPA for this storage. The U.S. Department of Energy (DOE) will continue to keep Ecology informed of these discussions with regards to the 221-T Tank System.

The management of the 221-T Tank System has been discussed between Fluor Hanford (FH), the U.S. Department of Energy, Richland Operations Office (RL), State of Washington, Department of Ecology (Ecology) and EPA since January 1999. RL is herein seeking concurrence from Ecology on this closure approach.

Mr. F. C. Jamison

DRAFT

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If you have questions or need further information please contact Ms. E. M. Mattlin 376-2385 or Mr. G. L. Sinton on 373-7939.

Sincerely,

S. H. Wisness, Director
Office of Site Services

cc:

Ecology Library, Kennewick

A. Varero, Ecology

[EPA]

P. Sobotta, NPT

J. R. Wilkinson, CTUIR

R. Jim, YN

R. Engelmann, FH

R. Gurske, FH

S. Luke, FH

Environmental Portal, LMSI