

## Meeting Minutes Transmittal

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
 Unit Managers Meeting  
 325 Building, Main Conference Room  
 Richland, Washington

July 14, 1994  
 1:00 p.m. to 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.

*Clifford E. Clark* Date: 10-18-94  
 Clifford E. Clark, Unit Manager, RL

Not Present Date: \_\_\_\_\_  
 Daniel L. Duncan, RCRA Program Manager, EPA Region 10

*Jeanne J. Wallace* Date: 9/20/94  
 Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

*Kathleen A. Poston* Date: 9/20/94  
 Kathleen A. Poston, Contractor Representative, PNL

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 1

### 325/3100 HAZARDOUS WASTE TREATMENT UNIT Unit Managers Meeting 325 Building, Main Conference Room Richland, Washington

July 14, 1994  
1:00 p.m. to 3:00 p.m.

#### Agenda

1. Approval of Past Unit Managers Meeting Minutes (Ecology/RL/PNL)
2. 325 HWTU Start-up Schedule (RL/PNL)
3. Status of TPA Change Request for TPA Procedural Closure (RL/PNL)
4. Status of Combined 325 HWTUs Part A (Form 3) (RL/PNL)
5. Status of Combined 325 HWTUs NOI for Tank Storage (RL/PNL)
6. Status of Combined 325 HWTUs Part B Permit Application (RL/PNL)
7. Ecology Letter on April 325 SAL Inspection (Ecology/RL/PNL)
8. General Discussion (Ecology/RL/PNL)
9. Status Action Items (Ecology/RL/PNL)
  - Past Action Items  
6-7-94:1  
PNL will provide Ecology (Ms. Wallace) a full justification regarding the TPA change request package by August 15, 1994.
  - New Action Items
10. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Proposed date of August 16
  - Proposed topics

## Attachment 2

**325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
325 Building, Main Conference Room  
Richland, Washington**

**July 14, 1994  
1:00 p.m. to 3:00 p.m.**

### **Summary of Discussion and Commitments/Agreements**

**1. Approval of Past Unit Managers Meeting Minutes**

The June 7, 1994 Unit Manager Meeting minutes were approved.

**2. 325 HWTU Start-up Schedule**

Ms. K. Poston (PNL) stated that progress was slow and no start-up date has been given.

**3. Status of TPA Change Request for TPA Procedural Closure**

Mr. B. Day (PNL) stated that the status of the change request is on hold, since Ms. J. Wallace (Ecology) requested documentation to support the procedural closure before the change request was submitted. Mr. C. Clark (RL) stated that the procedural closure documentation will be provided to Ms. Wallace by August 15, 1994, to be followed by a TPA change package to rework the milestones accordingly. Ms. Wallace stated that it should be made clear that a procedural closure is being requested for the biological and thermal units, but not for the shielded analytical laboratory. Mr. H. Tilden (PNL) responded that the information will be provided in the documentation.

**4. Status of Combined 325 HWTUs Part A (Form 3)**

Mr. Day stated that the final draft of the Form 3 is close to completion. WHC is drafting language for PNL to include the F-039 waste code in the Form 3.

**5. Status of Combined 325 HWTUs NOI for Tank Storage**

Ms. Poston stated that the draft notice of intent (NOI) is being modified and should be ready for review soon. Mr. Clark stated that there is a 150-day waiting period for public comment between the time the NOI is submitted to Ecology and the revised Form 3 is submitted. Mr. Clark asked about the possibility of requesting a time waiver regarding the 150-day waiting period. Ms. Wallace stated that she would discuss the issue with Mr. J. Witczak (Ecology), and she also requested examples of prior waivers that have been allowed.

**6. Status of Combined 325 HWTUs Part B Permit Application**

Mr. J. Donaghue (PNL) stated that PNL expects to receive a draft Part B permit application from the contractor by September 30, 1994. Mr. Tilden added that the permit application is scheduled for submittal to Ecology on June 30, 1995.

**7. Ecology Letter on April 325 SAL Inspection**

Ms. Wallace stated that the SAL inspection report has not been issued by Ecology. Ms. Wallace noted that there were no outstanding issues resulting from the inspection.

**8. General Discussion**

Mr. Clark noted that he wished to discuss a concern with the 300 Area Radioactive Liquid Waste System, in particular the 340 Complex. The concern is connected with, but not directly related to, 325. Mr. Clark stated that there have been several occasions over the past few years when it has not been possible to maintain compliance with the 90 day storage time limits under which the 340 Complex been operated. In 1989, RL requested an extension of the 90-day accumulation period in the 300 Area radioactive liquid waste system from Ecology, and Ecology responded by noting that a number of extensions had been requested and suggested that RL submit a plan for handling the situation. A compliance plan was submitted to Ecology in early 1990, which described the problem and provided a solution. Ecology has not responded to the compliance plan. Mr. Clark pointed out that since that time, some of the information in the compliance plan has become outdated. Mr. Clark stated that he has requested PNL and WHC to provide an assessment of the compliance status associated with the entire 300 Area radioactive liquid waste system. The compliance concerns deal with the 90-day accumulation time frame, technical and administrative components that are not in place, and separation of management (WHC and PNL) of the 340 building and the piping throughout the 300 area. Mr. Clark stated that RL wants to get together with Ecology soon and inform them more fully of the compliance issues and seek their assistance in coming up with an acceptable plan for attaining compliance. He estimated that the information would be available to provide to Ecology for feedback within a month.

Ms. Wallace inquired about the shutdown of the 325 Building. Ms. Poston estimated it would be at least a month before the facility starts up. Ms. Poston explained that the shutdown was due to a significant increase of personnel contamination and training issues.

**9. Status Action Items**

- Past Action Items

**Action item 6-7-94:1**, PNL will provide Ecology (Ms. Wallace) a full justification regarding the TPA change request package by August 15, 1994.

Mr. Tilden stated that based on a discussion he had with Ms. Wallace following the 6-7-94 Unit Managers Meeting, that the action item would be reworded to state that PNL and RL will provide a procedural closure information package by August 15, 1994.

- **New Action Items**

There were no new action items generated.

**10. Next Unit Managers Meeting**

- The next Unit Managers Meeting was scheduled for August 16, 1994, from 1 to 3 p.m.

- **Proposed Topics**

Topics for discussion at the next Unit Managers Meeting will include the same items on the agenda from this month's meeting.



Attachment 4

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
325 Building, Main Conference Room  
Richland, Washington

July 14, 1994  
1:00 p.m. to 3:00 p.m.

Action Items

Action Item #

Description

6-7-94:1

RL and PNL will provide Ecology (Ms. Wallace) a procedural closure information package by August 15, 1994.  
ACTION: B. Day (PNL)

OPEN

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K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
P. J. Turner	PNL	P7-34
J. J. Wallace	Ecology	N1-05

ADMINISTRATIVE RECORD: 325/3100 Hazardous Waste Treatment Unit, T-3-4  
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