

Meeting Minutes Transmittal

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington

May 5, 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.

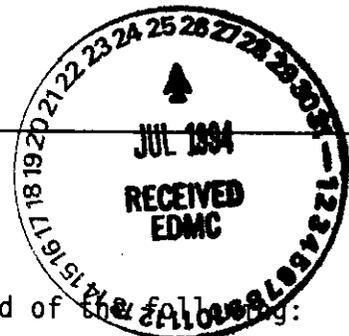
for Not Present *Clifford E. Clark* Date: 6/7/94  
Clifford E. Clark, Unit Manager, RL

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

*Jeanne J. Wallace* Date: 6/13/94  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

*Kathleen A. Poston* Date: 6/7/94  
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

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Attachment 1

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
~~337 Building, Mt. Rainier Room~~  
Richland, Washington

May 5, 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 RL/PNL 325 Consolidation Proposal (Ecology/RL/PNL)
4. TPA Change Package for PNL Units
5. General Discussion (Ecology/RL/PNL)
6. New Action Items (Ecology/RL/PNL)
7. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Proposed June 7, 1994 date
  - Proposed topics

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Attachment 2

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 building, Mt. Rainier Room  
Richland, Washington

May 5, 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 March 31, 1994 Unit Manager Meeting minutes were approved and signed.

2. 325 HWTU Start-up Schedule

Ms. K. Poston (PNL) stated that the start-up procedures are still being modified. A majority of the walk-throughs have been completed, but not all of the reports have been received. Ms. Poston indicated there has been discussion regarding modifying the hoods in Room 520. The hoods are explosion-proof, and due to changes in procedures the hoods are no longer required to be explosion-proof.

3. Status of RL/PNL 325 Consolidation Proposal

Mr. H. Tilden (PNL) stated that the 325 consolidation proposal has been transmitted to Ecology. Ms. J. Wallace (Ecology) acknowledged she had received the transmittal letter, and that she is in the process of drafting a response letter.

4. TPA Change Package for PNL Units

Mr. Tilden stated that a Tri-Party Agreement (TPA) change package to withdraw the Physical/Chemical Part A permit application is being formulated. The review schedule for the change package is being expedited in an effort to provide Ecology with a draft copy by the end of May 1994.

Ms. Wallace asked if the permitting strategy relates to the Physical/Chemical Part A. Mr. Tilden responded that the permitting strategy addresses the Physical/Chemical Part A. Mr. J. Donaghue (PNL) stated that the change control package will be a part of the permitting strategy, and the change control package will address all of the Treatment Technology based Part A's.

Ms. Wallace referred to previous discussions between Ecology and PNL (during which she was not present) regarding the permitting strategy. In an effort to clarify the permitting strategy each

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group was focusing on during those discussions, Ms. Wallace pointed out that the Ecology group considered the permitting strategy to be focusing on research, development and demonstration (RD&D) permitting and not the Part A's. Ms. Wallace noted that the EPA has the lead for RD&D permitting. Ms. Wallace then inquired about documentation resulting from the permitting strategy discussions. Mr. Tilden responded that he had the following documentation he would provide Ms. Wallace: a copy of the meeting minutes from the initial meeting between PNL and the regulators held January 22, 1993, and a copy of the presentation that was given during the meeting; a copy of Mr. Tilden's notes taken during the June 10, 1993 meeting; and a copy of the letter from Representative Lane Bray to Mr. C. Clark (Ecology), which suggested permitting approaches to reduce the amount time to obtain permits at the Hanford Site. Ms. Wallace stated she was compiling a file to document communication has been ongoing regarding the Part A's and the permitting strategy.

#### 5. General Discussion

Ms. Wallace stated that she would be inspecting the 325 HWTU on May 10, 1994. Ecology had previously inspected the 325 HWTU, and Ms. Wallace was not present during that inspection. Ms. Poston stated that following Mr. Dorsey's (Ecology) initial inspection of the 325 HWTU, issues such as adequate storage and determining quantity limits were brought up. As a result, PNL has requested that Mr. Dorsey provide verification regarding quantity limits. Ms. Poston added that Mr. Dorsey had indicated waste from a satellite area must go through a less than 90-day area before being sent to a treatment, storage and disposal (TSD) facility, instead of going directly from a satellite area to a TSD. Ms. Poston pointed out that PNL is planning to take waste directly from satellite areas to a TSD.

Ms. Wallace stated that she had requested Mr. Dorsey to generate a report on the results of his inspection, and that she will be reviewing the report. Ms. Wallace also stated she will ensure specific citations are provided by Mr. Dorsey regarding PNL's regulatory interpretations questions.

Ms. Wallace referred to the multi-purpose storage study associated with Milestone-33. The study involves the re-evaluation of sitewide waste streams in an effort to develop a multi-purpose waste handling facility. Ms. Wallace suggested that some of PNL's waste may be potential candidates for the study.

#### 6. New Action Items

There were no new action items generated during the meeting.

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7. **Next Unit Managers Meeting**

- **Proposed June 7, 1994 Date**

The next Unit Managers Meeting was scheduled for June 7, 1994.

- **Proposed Topics**

Topics for the next Unit Managers Meeting will include an update on the start-up schedule, a status of the consolidation proposal, a status on the TPA change package, and the findings resulting from Ms. Wallace's inspection of the 325 HWTU (SAL) unit.

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Attachment 4

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 Building, Mt. Rainier Room  
Richland, Washington

May 5, 1994  
1:00 p.m. to 3:00 p.m.

Action Items

Action Item #

Description

None

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Distribution:

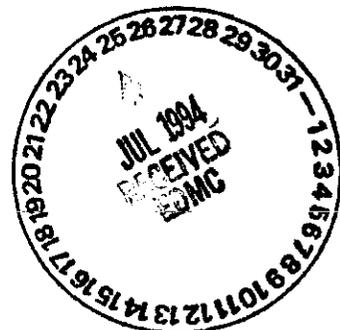
E. M. Bowers	RL	K8-50
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
D. L. Duncan	EPA Region 10	HW-106
G. D. Hendricks	GSSC	B1-42
K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
U. Subrahmanyam	GSSC	B1-42
H. T. Tilden II	PNL	P7-79
P. J. Turner	PNL	P7-34
J. J. Wallace	Ecology	N1-05

**ADMINISTRATIVE RECORD:** 325/3100 Hazardous Waste Treatment Unit, T-3-4  
[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  
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Please send comments on distribution list to K. E. Knox (H6-24),  
(509) 372-3596.



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