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Meeting Minutes Transmittal

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2100
Richland, Washington

March 26, 1997
3:00 p.m. to 4:00 p.m.

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

Bernadette R. Kenworthy Date: 29 Apr 97
Bernadette R. Kenworthy, Project Manager, DOE-RL

Ted A. Wooley Date: 5/1/97
Ted A. Wooley, Unit Manager, for Laura Cusack, Project Manager, Washington State Department of Ecology

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Anthony G. Miskho Date: 5/1/97
Anthony G. Miskho, Contractor Representative, FDH

Daniel G. Saueressig Date: 4/29/97
Daniel G. Saueressig, Permitting Representative, RFSH

Central Waste Complex, RFSH Concurrence

Kent M. McDonald Date: 4/29/97
Kent M. McDonald, Contractor Representative, RFSH

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 5 - Ecology Notice of Deficiency (NOD) Comments

Attachment 1

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2100
Richland, Washington

March 26, 1997
3:00 p.m. to 4:00 p.m.

AGENDA

1. **PREVIOUS MEETING MINUTES**

2. **PROGRAM STATUS**

   - Phase V - Project W-112 Status (R. Ames - RFSH)

3. **PERMIT APPLICATION STATUS**

   - Part B NOD Workshop Schedule (D. Saueressig- RFSH)

4. **BUDGET TOPICS**

   - FY96 Budget Status (D. Saueressig - RFSH)

5. **GENERAL TOPICS**

   - Past Action Items

3-21-96:3	Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor. ACTION: Mr. Miskho **OPEN**
5-31-96:2	RFSH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM. ACTION: Mr. Miskho **OPEN**

11-12-96:1	Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (RFSH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan. ACTION: Mr. Wooley **OPEN**
11-12-96:2	Mr. Miskho will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval. ACTION: Mr. Miskho **OPEN**
12-11-96:1	Mr. Barnes (RFSH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC. ACTION: Mr. Barnes **OPEN**
01-21-97:1	Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) a copy of the Interim Safety Basis (ISB) following approval of the document by DOE-RL. ACTION: Mr. McDonald **OPEN**

- New Action Items

6. **SCHEDULE NEXT MEETING**

- Tentative Date

Attachment 2

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2100
Richland, Washington

March 26, 1997
3:00 p.m. to 4:00 p.m.

Summary of Discussion and Commitments/Agreements

1. PREVIOUS MEETING MINUTES

Mr. T. Wooley (Ecology) referred to the discussion regarding the dose equivalent (DE) curie limits in the January 21, 1997 Project Manager Meeting (PMM) minutes, and expressed his concern with signing the minutes because the DOE-RL representative and FDH representative were not present during the meeting. Mr. R. Ames (RFSH) stated that the DE curie numbers he quoted during the 1-21-97 PMM were based on the past Safety Analysis Report, not the limits contained in the recently approved Interim Safety Basis (ISB). Mr. Ames explained that the As Low As Reasonably Achievable (ALARA) standard will be applied from the standpoint of personnel exposure to contact-handled waste; and if 200 millirem per hour is exceeded, then appropriate shielding will be used. Mr. Wooley agreed to sign the 1-21-97 PMM minutes, but because there were no DOE-RL or FDH representatives at the meeting, Mr. Wooley suggested moving the discussion on DE curie limits into todays minutes, thereby noting approval by the DOE-RL and FDH representatives.

Below is the discussion from the 1-27-97 PMM minutes on DE curie limits:

"Mr. Wooley initiated a discussion regarding curie loading limits at CWC. Mr. McDonald stated that the ISB contains the numbers for curie limits. Mr. R. Ames (RFSH) pointed out that the ISB is still a draft document before proceeding to explain that the dose equivalent (DE) curie limit was based on the largest accident that has been identified (vehicle crash and resulting fire) and a drum explosion accident. The inventories in the facility will be limited so as not to exceed the risk criteria used in the above-described accident situations.

Mr. Ames stated that the present safety analysis limit is 120 DE curies from drums potentially involved in an accident, plus 40 DE curies from the drums on the truck involved in the accident.

Mr. Wooley asked how the As Low As Reasonably Achievable (ALARA) standard applies to the DE curie limit. Mr. Ames responded that the DE curie limit is total radionuclide in the facility, and the same limits apply to contact handled waste. Mr. Wooley requested a copy

of the ISB. Mr. McDonald took an action to provide a copy as soon as it is approved by DOE-RL.

Mr. Wooley expressed his concern regarding the accuracy of verification and designation of the approximately 1200 drums that will be shipped from the 224-T TRUSAF and stored at CWC."

2. PROGRAM STATUS

- Phase V - Project W-112 Status

Mr. Ames provided a copy of the DOE-RL approved ISB to Mr. Wooley. Mr. Ames reported that RFSH is preparing for its Operational Readiness Review (ORR), and DOE-RL will follow with its ORR. W-112 is on schedule to be operational as a Hazard Category II facility by the end of June 1997. Mr. Ames explained that a Category II facility is identified as having significant potential for on-site consequences regarding radionuclide content.

3. PERMIT APPLICATION STATUS

- Part B NOD Workshop Schedule

Mr. D. Saueressig (RFSH) stated that comments regarding the Part B Permit Application have been received from Ecology (Attachment 5). Mr. Saueressig stated that a response to Ecology's comments will be provided by the next PMM.

4. BUDGET TOPICS

- FY96 Budget Status

Mr. Saueressig stated that RFSH is currently within its budget for CWC. Mr. K. McDonald (RFSH) stated that NOD workshops are budgeted for FY97.

5. GENERAL TOPICS

- Past Action Items

3-21-96:2, Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor.

This action item was left open (see discussion under action item 5-31-96:2).

5-31-96:2, RFSH will provide Ecology (T. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM.

Mr. T. Miskho (FDH) reported that DOE-RL and FDH met last week to discuss several options for resolution of the Building Emergency Plan (BEP) issue. Mr. T. McKarns (DOE-RL) stated that the BEP issue has been discussed at the RCRA Steering Committee meeting, and the issue will likely be addressed as a site-wide issue as well as unit specific. Mr. McKarns noted that one option is to establish certain agreements regarding the BEP and documenting them in the RCRA Handbook (DOE/RL-96-10).

11-12-96:1, Mr. Wooley, (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (RFSH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan.

This action item was left open (see discussion under action item 5-31-96:2).

11-12-96:2, Mr. Miskho will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval.

This action item was left open (see discussion under action item 5-31-96:2).

12-11-96:1, Mr. Barnes (RFSH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC.

This action item was left open.

01-21-97:1, Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) a copy of the Interim Safety Basis (ISB) following approval of the document by DOE-RL.

A copy of the ISB was provided during the 3-26-96 PMM, closing this action item.

- New Action Items

Mr. Wooley inquired about the approximately 1200 containers to be shipped from 224-T TRUSAF to CWC. Mr. McDonald explained that the containers have undergone RTR as part of the Waste Isolation Pilot Plant (WIPP) certification. The RTR paperwork for each container is reviewed, and if there is enough information on the paperwork the container will be sent to CWC. If there is not adequate information, the original RTR tape is reviewed. If the tape does not reveal clarifying information, the container will be RTR'd before it is shipped to CWC.

Mr. Wooley expressed concern that once the containers reach CWC, they will meet the WIPP waste acceptance criteria (WAC), but may not meet the CWC Waste Analysis Plan (WAP) storage requirements. Mr. McDonald responded that the 224-T TRUSAF containers have received a much

higher percentage of verification than required by the current CWC WAP. Mr. Wooley requested information regarding the guidance for process knowledge that is being applied to the containers. Mr. McDonald agreed to provide the information, and suggested setting up a sample of containers for Ecology to observe the verification process.

03-26-97:1, Mr. McDonald will provide Mr. Wooley the guidance information regarding process knowledge that is being applied to the 1200 containers being received at CWC from 224-T TRUSAF.

6. SCHEDULE NEXT MEETING

- Tentative Date

The next PMM was scheduled for May 1, 1997, in Richland, Washington.

Attachment 3

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2100
Richland, Washington

March 26, 1997
3:00 p.m. to 4:00 p.m.

Attendance List

Name	Organization	Phone #
Ted Wooley	Ecology	736-3012
Mike Ciminera	GSSC	946-3681
Kent McDonald	RFSH	373-4981
Paul Macbeth	GSSC	372-2289
Kathy Knox	Knox Court Reporting	946-5535
Dan Saueressig	RFSH	376-9739
Tony McKarns	DOE-EAP	376-8981
Cliff Stephan	RFSH	373-1325
Randy Ames	RFSH	373-2067
B. R. Kenworthy	DOE-WM	372-3459
Jim Golden	FDH	376-6961
Tony Miskho	Fluor Daniel	376-7313

Attachment 4

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2100
Richland, Washington

March 26, 1997
3:00 p.m. to 4:00 p.m.

Action Items

Action Item #	Description
3-21-96:3	Check to see if there is some type of quantifiable criteria by which CWC personnel determine whether a spill is major or minor. ACTION: Mr. Miskho **OPEN**
5-31-96:2	RFSH will provide Ecology (Mr. Wooley) the comparison between the unit specific BEP versus the Hanford Contingency Plan(s) at the next PMM. ACTION: Mr. Miskho **OPEN**
11-12-96:1	Mr. Wooley (Ecology) will provide Mr. McKarns (DOE-RL), Mr. Saueressig (RFSH) and Mr. Miskho (FDH) an outline of the detail he is requesting to be included in the Building Emergency Plan. ACTION: Mr. Wooley **OPEN**
11-12-96:2	Mr. Miskho will determine a course of action in an effort to provide a Building Emergency Plan to meet Ecology's approval. ACTION: Mr. Miskho **OPEN**
12-11-96:1	Mr. Barnes (RFSH) will establish a time for Mr. Wooley (Ecology) to observe an emergency exercise at CWC. ACTION: Mr. Barnes **OPEN**

01-21-97:1 Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) a copy of the Interim Safety Basis (ISB) following approval of the document by DOE-RL.
ACTION: Mr. McDonald

CLOSED

03-26-97:1 Mr. McDonald (RFSH) will provide Mr. Wooley (Ecology) the guidance information regarding process knowledge that is being applied to the 1200 containers being received at CWC from 224-T TRUSAF.
ACTION: Mr. K. McDonald

OPEN

Attachment 5

CENTRAL WASTE COMPLEX
Project Managers Meeting
2440 Stevens Center, Room 2100
Richland, Washington

March 26, 1997
3:00 p.m. to 4:30 p.m.

Ecology Part B Permit Application Notice of Deficiency Comments

The Central Waste Complex Part B Permit DOE/RL-91-17 WD2
Notice of Deficiency Table No. 1

No.	Comment/Requirement
1.	Page l-1, line 17. Comment: It is not clear why the Part A, form 3s for the Central Waste Complex (CWC) and Waste Receiving and Processing (WRAP) were combined. Requirement: Clarify this part of the discussion.
2.	Page l-1, line 20. Comment: Ecology's review of the most recent CWC Part A, form 3, REV 3 against REV 4 did not identify an additional 23 waste codes. Please identify which codes were added. If REV 4, dated 10/01/96, is not the most current CWC Part A, the U.S. Department of Energy (USDOE) will need to resubmit the currently active Part A and, if there are significant changes, re-certification may have to take place. Requirement: Explain how the addition of 23 waste codes was justified and to which Part A revision.
3.	Page 2-1, Section 2.0. Comment: Ecology's Dangerous Waste Permit Application Requirements document, sections B-1a(2) and (3) have not been addressed. Items, such as a detailed flow diagram description of the dangerous waste management operations and any Dangerous Waste Regulations regarding "treatment by generator," are missing from this section. Requirement: Review the permit application requirements, as referenced above, and revise the Part B accordingly.
4.	Page 2-1, line 51. Comment: The sentence beginning with, "The floor accommodates a 908-Kg forklift . . . and an approximate 1000, container equivalent load, depending on the waste management criteria," is confusing. What is a 1000 container equivalent load? Also, what does discussion on floor load capacity have to do with waste management criteria? Requirement: Please revise\clarify this sentence with the above questions being the basis for revision.
5.	Page 2-2, line 22. Comment: What type and magnitude of module modification does it take to facilitate modification of the Part A. As the text reads now, there could be a lot of changes to the modules with little or no revision to the CWC Part A. Requirement: Provide further information on the process.

6. Page 2-3, line 9. Comment: Please see comment/requirement #4 above.

7. Page 3-1, Section 3.1. Comment: Although the reference to the Dangerous Waste Application Requirements is correct, the section does not fulfill the prescribed elements laid out in C-1 and C-1(a). C-1(a) stipulates the following: "Include the identity and concentration of all constituents and physical properties . . . "

   Requirement: Clarify how the text presented in section 3.1 meets the elements of C-1 and C-1(a).

8. Page 3-1, line 14. Comment: This sentence identifies mixed waste as being the only type of waste that can be stored in CWC. Does this mean there is absolutely no "non-mixed" dangerous waste currently stored at CWC?

   Requirement: Provide information to answer the above question.

9. Pages 4-1, line 48. Comment: This paragraph does not mention "state only" waste codes WSC2 and W001. Is this list meant to be comprehensive or not?

   Requirement: Please explain why the two waste codes mentioned above are not listed under section 4.1.1.1.

10. Page 4-1, line 46. Comment: The text indicates that marking and labeling requirements are discussed in chapter 3.0, Where?

    Requirement: Please identify where these instructions are specifically found in chapter 3.

11. Page 4-2, Section 4.1.1.2. Comment: Requirement D-1c, although referenced, is not met in this section. Container Labeling is not discussed anywhere in this section.

    Requirement: Please clarify where labeling is described in this section, or where it can be found in the Part B. If it is not currently in the Part B, please add it, pursuant to requirement D-1c.

12. Page 4-2, line 41. Comment: This section is incomplete. The secondary containment calculations (as noted in Appendix 4C) are not yet available. This requirement must be met during interim status, just as it would be required in final status.

    Requirement: Provide these calculations as soon as possible. The Part B cannot be approved without these calculations completed and inserted into the document.

13. Page 4-3, line 27. Comment: How can sections 4.1.2.2 and 4.1.2.3 be completely accurate if the secondary containment calculations, as noted in comment #12, are not complete?

    Requirement: Explain how discussions provided in sections 4.1.2.2 and 4.1.2.3 are valid without the appropriate calculations completed.

14. Page 4-4, line 10. Comment: How visually accessible are the trench drains? Can an accurate assessment of the volume contained by the trenches be made?

    Requirement: Describe in more detail the visual accessibility of the storage pad trenches.

15. Page 4-4, line 21. Comment: In what building is the logbook kept and what type of release would facilitate a change to the logbook.

    Requirement: Please provide answers for the above questions.

16. Page 4-5, line 26. Comment: Who is responsible for developing a sampling and analysis plan for the wipe sampling events?

    Requirement: Revise document to include more detail on the development and implementation of the sampling plan.

17. Page 4.-6, line 32. Comment: This sentence is somewhat confusing. The Part A describes solidification of free liquids as a treatment process performed at CWC, yet free liquids are only looked for under specific instructions. Does this mean there is a potential for free liquids to be stored at CWC? If so, how does the Part A reflect this. Of the drums that are stored long term, what percentage of the total drum volume can contain free liquid?

18. Page 4-7, line 16. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(1). The following direction is given: "Provide sketches, drawings, or data that containers of reactive waste exhibiting a characteristic specified in WAC 173-303-090(7)(vi), (vii) or (viii) are stored in a manner equivalent . . . ," but is not indicated in the text currently in the permit application.

    Requirement: Explain why all of the information identified in D-1f(1) is not provided in section 4.3.1. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built

sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will considered as unfulfilled.

19. Page 4-7, line 23. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Provide sketches, drawings, or data demonstrating that container storage of ignitable waste and reactive waste." Requirements listed in section D-1f(2) go beyond what the permit language currently includes.

    Requirement: Explain why all of the information identified in D-1f(2) is not provided in section 4.3.2. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will be considered as unfulfilled.

20. Page 4-7, line 32. Comment: This paragraph is insufficient in terms of providing the elements identified in Section D-1f(2). The following direction is given: "Through sketches, drawings, and/or data demonstrate that a container holding a dangerous that is compatible with any waste . . .." Requirements listed in section D-1f(3) go beyond what the permit application language currently includes.

    Requirement: Explain why all of the information identified in D-1f(3) is not provided in section 4.3.3. If this information can be found in various portions of the document, please identify those sections. If there are related plan views or as-built sketches, those should be referenced within this section so the reader does not have to search for them. If there are no sketches that apply to reactive waste storage, this requirement will consider as unfulfilled.

21. Page 6-2, line 8. Comment: Section F-2 in the requirements is actually entitled, "Inspection Plan," not "Inspection Requirement." What process does CWC have that would be considered equivalent?

    Requirement: Explain how WAC-173-303-806 (4)(a)(v), -303-320, -303-340, 40CFR 270.14, and 264.15 are being met within this section, or even within the permit application.

22. Page 6-2, line 24. Comment: There is no apparent attempt in this section to meet requirement F-2a(1).

    Requirement: Please review the elements identified in F-2a(1) and describe how these are met with the permit application.

23. Page 6-2, line 24. Comment: It would be helpful to get a copy of a blank inspection checklist, in order to better understand what is actually looked for on a standard inspection

Requirement: Please provide a copy.

24. Page 6-3, Line 35. Comment: F-2c(1)(c) requires specifying actual timelines for taking corrective action. Line 35 of Section 6.2.2 of the permit application defers discussion of the timeline to the BEP (appendix 7a). The BEP does not indicate a timeline for corrective action.

Requirement: Revise either section 6.2.2 and\or the BEP pursuant to F-2c with regard to all spill types. Please emphasize timeline for corrective actions and positions responsible for taking corrective action or ensuring other staff remedy the problems. If this information is already available, please identify where it exists. Further discussion on adequacy of the information with regard to regulatory requirements will most likely be necessary.

25. Page 6-4, line 15. Comment: This section refers the reader to section 6.2.2, which refers the reader to the BEP for corrective actions other than spills to secondary containment. As discussed in comment #24, the BEP does not adequately address corrective action schedules.

Requirement: Please see requirement #24 with focus on F-2d(1)(b)(i) and (ii).

26. Page 7-1. Comment: Currently, Ecology is having internal discussions on whether the combination of unit specific BEP and Attachment 4 of the Hanford Facility Permit (DOE/RL 91-28) plus other documents, such as, the plant operating procedures and WHC-CM-4-43 actually make up an effective "overall contingency plan." The main questions Ecology has at this time is: (1) When do USDOE and contractors actually consider the BEP implemented, and (2) what does that mean in terms of reporting requirements? Additional NODs will results from that discussion.

Requirement: Please prepare for future discussions on how the combination of all of the documents actually fulfill requirements pursuant to WAC 173-303-350.

27. Page 10-1. Comment: There is no mention of intent to meet 40 CFR 264.75(h) and (I) requirements. A quick review of DOE/RL-97-16, the Hanford Site Annual Dangerous Waste Report, indicates some deficiencies. Generator identification is lacking in most cases and there is no mapping of waste location as required in 40 CFR.

Requirement: Review the federal requirements. Revision of -97-16 or Section 10 of the permit application will be necessary.

28. Page 11-2 line 1. Comment: Reference to the background document will require updating. A cross-reference to the appropriate contractor will be necessary, unless some portions of Westinghouse Hanford still exist. If WHC 1991a is the relevant document then Ecology concurrence should have occurred and been documented, or use of it for permiting activities may not be appropriate. Also, sampling requirements imposed by WAC-173-340, as implemented by WAC-173-303, must be considered in corrective action.

Requirement: Revise the permit application to correctly reference the site background document and verify Ecology approval of the document. Also, add the reference to WAC-173-340.

29. Page 11-2 line 11. Comment: There is no mention of providing Ecology with a sampling and analysis\decontamination plan as part of the closure requirements. Although this may be implied, it makes sense to actually identify this as a major deliverable prior to implementing closure activities.

Requirement: Revise section 11.1.2 to include an Ecology approved the SAP\decon plan as a preclosure deliverable. The format will be based on the most current Ecology guidance (current to the year that CWC is actually closed).

30. Page 13-1. Comment: WAC-173-340 will require referencing. Also, as stated in the requirements list, all permits applied for or received from any regulatory agencies.

Requirement: Please revise the permit application to meet this requirement under Section J.

31. Page APP 3A-i. Comment: A detailed set of NODs on the Waste Analysis Plan (WAP) for CWC will be submitted by Ecology in the coming weeks. There are still some outstanding issues on the WAP guidance that need resolution.

Requirement: An agreement of when Ecology will provide NODs on the WAP will be discussed as part of the work shop schedule at the next project managers meeting.

32. Page APP 4C-i. Comment: When will secondary containment calculations be available? The part B cannot be approved prior to having the calculations.

Requirement: Please give a date.

33. Page APP 4D-i. Comment: There is no information on how durable the sealant is in terms of reaction to chemical spills and physical damage from drum movement. MSDS information, although necessary, does not whether the sealant is appropriate for the application it is being used for.

Requirement: Revise the permit application, adding the requested information.

34. Page APP 7A-i. Comment: Ecology is not prepared to give a complete set of NODs on the BEP because of current internal discussions.

Requirement: A date will be set for submittal of BEP NODs. NODs were submitted in January 1996 which, at a minimum, will require completed resolution. Additional NODs will be dependent on the outcome of Ecology discussions.

35. Page APP 8A-i. Comment: There is no reference to Section H the Dangerous Waste Application Requirements document, Why?

Requirement: To be consistent and to have the correct focus on training requirements, please reference Section H.

36. Page 12, 1st para. under bullets. Comment: What happens with personnel who cannot pass the training requirements. Are they restricted from doing related work?

Requirement: Please clarify how training deficiencies are handled.

37. Page 13, 1st sentence. Comment: Define exempt personnel.

Requirement: For clarification purposes, please define which positions are considered exempt.

38. Page 15, Section 5.11. Comment: How long is a person allowed to remain in the remedial training program, and what work restrictions are imposed on them during this time?

    Requirement: Please answer questions.

39. Page A-1, 1st para. Comment: What process is in place for determining what type of training applies to a specific position?

    Requirement: Clarify how this determination is made.

40. Page A-2, Training Matrix. Comment: This table is confusing.

    Requirement: Part of a project mangers meeting will be devoted to discussion on how to use the table.

41. Page A-12, Category G. Comment: The 40 hour and 16 hour Hazardous Waste Operations Training is considered "Non-RCRA," why?

    Requirement: Clarify how this is categorized as "Non-RCRA."

Distribution:

W. D. Adair	FDH	(H6-21)*
S. M. Addleman	RFSH	(T4-04)*
R. R. Ames	RFSH	(T4-03)
L. D. Arnold	FDH	(B2-35)*
E. S. Aromi	RFSH	(T3-01)*
B. M. Barnes	RFSH	(T3-05)
R. C. Bowman	RFSH	(H6-24)*
B. J. Broomfield	RFSH	(T3-04)*
R. M. Carosino	RL	(A4-52)
M. Ciminera	GSSC	(A4-35)*
C. E. Clark	RL	(A5-15)*
R. R. Durfee	RFSH	(T4-04)*
R. H. Engelmann	RFSH	(H6-26)*
E. G. Erpenbeck	FDNW	(G3-15)*
R. J. Giroir	RFSH	(T4-05)*
R. F. Guercia	RL	(S7-55)*
R. M. Irwin	RFSH	(T4-03)*
B. R. Kenworthy	RL	(S7-55)*
P. J. Macbeth	GSSC	(R3-82)*
K. M. McDonald	RFSH	(T4-04)*
A. C. McKarns	RL	(A5-15)
A. G. Miskho	FDH	(H6-23)*
L. R. Olsen	RFSH	(T4-61)
S. M. Price	FDH	(H6-23)*
D. G. Saueressig	RFSH	(H6-24)
H. T. Tilden II	PNL	(P7-79)
B. D. Williamson	FDH	(B3-15)*
J. A. Winterhalder	RFSH	(H6-21)*
T. A. Wooley	Ecology	(B5-18)
M. T. Yasdick	RFSH	(H6-10)*
RCRA Files	RFSH	(H6-23)

*cc:Mail

ADMINISTRATIVE RECORD: Central Waste Complex, TS-2-4 [Care of EDMC, FDH (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 Stop HW-070 (Records Center)

Please send comments on distribution list to D. Saueressig, RFSH (H6-24),(509) 376-9739