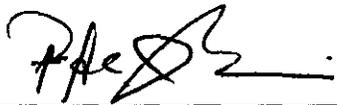


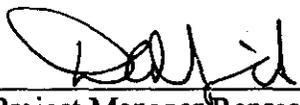
Meeting Minutes Transmittal

310 TEDF Project Meeting  
Ecology Interface Meeting  
2704HV/Rm. G229/600 Area  
Hanford, Washington  
November 29, 2001

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

  
Date: 01-31-02  
Fred Jamison, Project Manager, Ecology

  
Date: 2/8/02  
Project Manager Representative, RL

  
Date: 2/8/02  
Project Manager Representative, FH WMP  
REC

RECEIVED  
FEB 22 2002  
EDMC

## **310 TEDF PROJECT MEETING MINUTES**

**Project Managers Meeting  
2704HV/G229/600 Area  
Hanford, Washington**

**November 29, 2001**

- I. Approval of the September 27, 2001 310 TEDF Project Meeting Minutes (Ecology/DOE-RL/FH)**
- II. Operational Status**  
*No operational status report was available*
- III. Project Specific Issues**
  - A. Update on Permit by Rule treatment of RCRA HW at 310 TEDF**
    - 1. Don McBride (FH) presented an update on the future outlook for implementation of RCRA PBR provisions at 310 TEDF. Mr. McBride indicated that the Hanford Site's non-radioactive characteristic hazardous waste is typically shipped off-site for treatment/storage/disposal. Mr. McBride indicated that 310 TEDF could treat the subject waste stream(s) under PBR provisions at a lower cost than is currently being expended, while remaining compliant with all NPDES permit conditions. Mr. McBride indicated that 310 TEDF management has recently determined that PBR implementation provides sufficient improvements in cost and resource utilization to recommend moving forward. Mr. McBride indicated that implementation would take approximately one year. However, recent budget shortfalls could impact the implementation schedule.**
  - B. Discuss need for continued PMM for 310 TEDF**
    - 1. Jon Perry (FH) requested Ecology's concurrence to discontinue 310 TEDF PMMs. Mr. Perry explained that TEDF does not meet the PMM applicability criteria defined in the TPA. Mr. Perry explained that Under Section 4.1 of the TPA, PMMs are to be convened for facilities that have TPA commitments.**
    - 2. Fred Jamison (Ecology) agreed that 310 TEDF did not have TPA commitments. However, Mr. Jamison did not concur with the request to discontinue PMMs. Mr. Jamison said he wanted to hold PMMs on an as-needed basis. Mr. Jamison indicated that PMMs could be requested by either RL or Ecology.**

3. Leo Guillen (RL) indicated that RL's position was that PMMs should not be held at all for 310 TEDF. However, specific meetings on 310 TEDF, other than PMMs, would be acceptable. Mr. Jamison said that Ecology did not agree with RL's position. Mr. Guillen indicated that he would carry this message to RL and that further meetings with Ecology to discuss this matter could be scheduled later with Ecology.

IV. Status of Action Items

- A. No action items to report

V. New Action Items

- A. Mr. Jamison requested that RL/FH continue to submit monthly operational status reports.

VI. Next Project Meeting

- A. To be scheduled as needed

This message proposes the following agenda item for the next 310 TEDF PMM:  
*Propose Discontinuing 310 TEDF PMMs.*

**Background**

Until recently, Project Manager Meetings (PMM) for the 340 Facility and 310 TEDF have been scheduled together as a portion of the 200 Area Waste Management Division PMM. Ecology recently agreed to move the 340 Facility PMM to the Transition Projects Division PMM (also called the 300 Area General Topics PMM) because 340 is inactive and because the 340 Facility is undergoing transition to deactivation and is a portion of the upcoming River Corridor Closure Contract action. While looking at transferring the 340 PMM, it was determined that the Tri-Party Agreement (TPA) does not require 310 TEDF PMMs. Consequently, as a cost-saving measure, these meetings could reasonably be discontinued.

**Justification**

PMMs were designed as an interface between DOE and the lead regulatory agency (Ecology or EPA) for TPA facilities. Per TPA Section 4.1, the primary responsibility of the Project Managers is to implement the scope, terms, and conditions of the TPA. To accomplish this, Section 4.1 requires that Project Managers regularly meet to discuss progress, address issues, and review plans pertaining to TPA-addressed projects, milestones, operable units and/or TSD groups/units. Based on this, 310 TEDF operations do not warrant PMMs because:

- 310 TEDF operations are not associated with TPA project schedules, milestones, or operable unit cleanup activities;
- 310 TEDF performs no permitted TSD unit activities and is not a portion of a TSD group/unit; and,
- 310 TEDF is a Clean Water Act facility that operates under a National Pollutant Discharge Elimination System (NPDES) permit. The Clean Water Act is outside the scope of the TPA and so permitted NPDES activities do not interface with TPA requirements.

As always, RL is happy to meet with Ecology and 310 TEDF is ready to accommodate inspections whenever appropriate. However, based on the above, PMMs are not the appropriate forum for such interface. Consequently, the expenditure of resources necessary to continue regularly scheduled 310 TEDF PMMs is not justified and the meetings should be discontinued.

---

# **PERMIT BY RULE**

**IMPLEMENTATION OF HAZARDOUS WASTEWATER TREATMENT**

**AT THE 300 AREA TREATED EFFLUENT DISPOSAL FACILITY**

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

- PROPOSED ACTIVITY
  - Treat hazardous wastewaters under Permit By Rule regulations
  - Primary source is containerized wastewater generated at Hanford and sent off-site
  - Designated characteristic hazardous waste
  - Discharge under NPDES permit authorization

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

- WORK COMPLETED TO DATE
  - Included in the NPDES Permit
  - Included in Site RCRA Form 2
  - Environmental requirements review
  - Regulatory analysis
  - Potential wastewater source review

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

---

- **COST IMPACT**
  - Estimated cost savings \$55-\$100k per year
  - Incremental startup costs estimated \$80k
  - Assume no staffing increase
  - Waste acceptance administration costs may provide an opportunity for additional cost savings

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

---

- REGULATORY IMPACT
  - Expect continued NPDES compliance
  
- PROCESS IMPACT
  - Capacity and capability available
  - Minimal increase in process upset risk

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

---

- FACILITY RESOURCES
  - Increase facility asset utilization
  - Increase personnel utilization
  
- FACILITY FUTURE
  - Broader service, new clientele
  - Additional asset in 300 Area revitalization

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

- PATH FORWARD
  - Move forward with tasks defined to achieve implementation readiness and initiate treatment (dependent on available funding)

## PERMIT BY RULE IMPLEMENTATION AT THE 300 AREA TEDF

---

---

- IMPLEMENTATION TASKS
  - Prepare the required documents
  - Establish the acceptance process with Waste Services
  - Confirm details on source data
  - Develop acceptance criteria
  - Evaluate pre-treatment options

**310 TEDF PROJECT MEETING  
2704HV/Rm. G229/600 Area  
Hanford, Washington  
November 29, 2001**

**10:00 a.m. to 10:15 a.m.**

**Agenda**

- I. Approval of past 310 TEDF Project Meeting Minutes (Ecology/DOE-RL/FH)
- II. Operational Status
- III. Project Specific Issues
  - A. Update on Permit by Rule treatment of RCRA HW at 310 TEDF (D. McBride)
  - B. Discuss need for continued PMM for 310 TEDF (J. Perry).
- IV. General Discussions
- V. Status of Actions
- VI. New Action Items
- VII. Next Project Managers Meeting

