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Meeting Minutes Transmittal

PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
Federal Building, Room 784B
Richland, Washington
Kennewick

January 24, 1995
8:30 a.m. - 10:30 a.m.

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

Not Present

Alex R. Miera, Unit Manager, EAP, DOE-RL

Date:

Moses N. Jaraysi
Moses N. Jaraysi, Unit Manager, Washington State Department of Ecology

Date: 4/14/95

Daniel L. Duncan
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Date: 4/26/95

Gregory J. LeBaron
Gregory J. LeBaron, PUREX Contractor Representative, WHC

Date: 27 MAR '95

Purpose: Discuss PUREX Deactivation 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 - PUREX Deactivation Flushing DQO Document Presentation
- Attachment 6 - PUREX/UO3 Transition Status
- Attachment 7 - Hanford Facility Permit PUREX Storage Tunnel Unit Inclusion Schedule



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Attachment 1

PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
Federal Building, Richland, Washington
Tuesday, January 24, 1995

- AGENDA -

8:30 AM - 10:30 AM

INTRODUCTIONS

TOPICS FOR DISCUSSION

- Data Quality Objectives document

STATUS ITEMS

- PUREX/UO3 transition status
- Part A revisions/PUREX Storage Tunnels and PUREX Plant
- Project Management Plan (PMP)
- Public Involvement plans for NEPA and the TPA

GENERAL TOPICS

- Action items
 - Past action items
 - New actions items
- Additional discussion
- Scheduling of next meeting

The videoconference meeting will link the Federal Office Building (room 784-B) in Richland and the Ecology Lacey office.

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Attachment 2

**PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
Federal Building, Room 784B
Richland, Washington**

**January 24, 1995
8:30 a.m. - 10:30 a.m.**

Summary of Discussion and Commitments/Agreements**TOPICS FOR DISCUSSION**

- **Data Quality Objectives Document**

Mr. R. Bhatia (WHC) distributed a handout (Attachment 5) and provided a status regarding the PUREX deactivation Data Quality Objectives (DQO) document. Mr. Bhatia and Mr. G. LeBaron (WHC) referred to EPA's comment regarding land disposal restrictions (LDR) ~~and stated that since LDRs were not addressed during the DQO meetings, they were not included in the DQO document.~~ The formal response to the LDR comment will take the form of a letter from RL to EPA. Mr. D. Duncan (EPA) agreed that a response in the form of a letter would be appropriate.

Comments were received from Ecology, and Mr. Bhatia stated that RL/WHC believe the majority of the comments have been resolved. Mr. Bhatia provided letters outlining resolution of the comments for Ecology and EPA concurrence. RL/WHC proposed to resolve concerns about data validation and deviations from SW-846 separately from the DQO process, because no agreements pertaining to these topics were reached during the DQO meetings.

Mr. M. Jaraysi (Ecology) noted that the regulations state that deviation from approved methods must be approved prior to sampling or analysis. Mr. LeBaron stated that the laboratory procedures were submitted to Ecology for approval some time ago. Mr. F. Ruck (WHC) added that his understanding was that the issue had been resolved. Mr. Jaraysi responded that he has not seen approval of RL/WHC's proposed methods. Mr. Jaraysi stated that if the deviations the 222-S Laboratory will be using have been approved, then the issue is resolved; and if the deviations have not been approved, then Ecology will not allow them to be used until Ecology has approved them. Mr. Ruck stated that RL/WHC will take an action to provide Ecology and EPA a package of information addressing the issue of deviations from SW-846.

Ecology, EPA, and RL/WHC agreed to approve the DQO document and to address issues related to data validation and deviations from SW-846 separately.

STATUS ITEMS

- **PUREX/UO3 Transition Status**

Mr. LeBaron distributed a handout (Attachment 6) and provided an update on the PUREX/UO3 transition activities. Mr. Jaraysi requested a copy of the final memorandum of agreement between EM-40 and EM-60 transferring UO3 from WHC to Bechtel. Mr. G. Senat (RL) responded that RL would provide Ecology a copy as soon as it is signed.

Mr. LeBaron referred to the ongoing activities at PUREX (outlined on Attachment 6), noting that sample analyses for K, G, and R Cell flushes are en route to the regulators. Mr. LeBaron pointed out that holding time and blank/spike requirements were not met in all cases. He added that modifications have been made to the sampling and analysis plan to clarify QA/QC requirements.

The environmental assessment (EA) regarding shipment of the nitric acid is expected to go out for public review in February 1995. Mr. Duncan inquired about a schedule for the shipment of the nitric acid, and Mr. LeBaron responded that the EA must be approved before a schedule can be developed. Mr. Senat stated that the EA may be approved and shipments initiated by April 1, 1995. Mr. LeBaron stated that the EA for shipping fuel to K Basins is in RL review and will undergo the normal public involvement process.

Mr. LeBaron described the use of the E-F11 Concentrator, which is being used to boil off rainwater and steam condensate (from steam heating tanks). Operation of the concentrator will eliminate the transfer of approximately 132,000 gallons of effluent to Tank Farms during deactivation.

Mr. Jaraysi stated that Ecology received the UO3 end point criteria document, which satisfies one of the interim TPA milestones.

- **Part A Revisions/PUREX Storage Tunnels and PUREX Plant**

Mr. M. Cline (WHC) stated that the PUREX Storage Tunnels Part A permit application (Part A) was submitted to Ecology on December 28, 1994. The PUREX Plant Part A is in concurrence at RL and is scheduled for certification this week. The PUREX Plant Part A should be released for Ecology review by the end of this week. The PUREX Storage Tunnels Part B permit application (Part B), Revision 2, has been provided to Ecology for review. Mr. Cline noted that RL/WHC concurred with the notice of deficiencies (NODs) and they were incorporated into Revision 2;

¹ During the meeting, Mr. LeBaron indicated that use of the concentrator would eliminate the generation of approximately 180,000 gallons of effluent; however, the correct value is closer to 132,000 gallons.

however, Ecology has not responded whether or not the NODs were incorporated properly.

Mr. Cline distributed a Hanford Facility Permit PUREX Storage Tunnels Unit inclusion schedule (Attachment 7). The schedule reflects incorporation of the PUREX Storage Tunnels Part B into the Hanford Facility Permit in Modification B (July 1996). The final revised Part B is scheduled to be submitted to Ecology by November 15, 1995. RL/WHC took an action to fax the schedule to EPA. Mr. LeBaron notes that the schedule assumes the PUREX Storage Tunnels will not be used in the future to store other Hanford waste.

- **Project Management Plan (PMP)**

Mr. W. Jasen (WHC) stated that the PMP was approved by DOE-Headquarters in December 1994, and RL has an approval letter in progress.

- **Public Involvement Plans for NEPA and the TPA**

Mr. Jasen stated that a series of public meetings are scheduled for March 1995 regarding the TPA milestone packages. It is expected that the EAs will be discussed during the public meetings.

Mr. Jasen noted that 30 copies of the initial draft spent fuel EA were provided at the November 1994 Hanford Advisory Board (HAB) meeting, and only one HAB member provided comments. With regard to the nitric acid EA, Mr. Jasen indicated that more than 70 individuals and groups were notified. The spent fuel and nitric acid EAs, pending the National Environmental Policy Act (NEPA) compliance review by RL, should go out for public review by mid-February 1995.

GENERAL TOPICS

- **Action Items**

Past Action Items

Ms. Robertson stated that all of the past action items have been resolved.

Action item 7-26-93:3, Mr. Jaraysi will identify what kind of flexibility Ecology might have to abbreviate the NOI process. This action item was closed as a result of the TPA negotiations. Action item 1-10-94:2, Ecology will provide a list of attendees from the December 10, 1993, and February 22, 1994, public meetings. The lists were transmitted on April 13, 1994, and this action item was closed.

0181 222122

Action item 4-5-94:1, Ecology will provide RL/WHC a status regarding the organic transfer to DOE-Idaho as soon as possible. A status was provided April 6, 1994, indicating that discussions with Idaho had proven unfruitful. The action item was closed.

Action item 4-5-94:2, The regulators will provide RL/WHC with comments regarding the agenda for the technical discussions and the schedule; and Ms. J. Robertson (WHC) will finalize the agenda and dates. These actions were taken, and the action item was closed.

Action item 4-5-94:3, The regulators will provide RL/WHC with comments regarding the PMP by the end of April 1994. No comments were received from DOH or EPA; Ecology comments were provided May 2, 1994. The action item was closed.

Action item 4-5-94:4, WHC will provide the public involvement information bulletin and draft public involvement plan to the regulators as soon as possible. These documents were provided on April 6, 1994, and the action item was closed.

Action item 4-5-94:5, Ecology will contact HEAL to follow up on their comments and determine whether or not a subsequent meeting is necessary. HEAL was contacted and indicated that no special follow up meeting was necessary. This action item was closed.

Action item 4-5-94:6, WHC will provide EPA and DOH with the April 1994 list of near-term PUREX/UO3 deactivation activities. The list was provided, and the action item was closed.

Action item 4-5-94:7, WHC will provide the regulators the approved work plan for transferring D-5 and E-6 material. The plan was provided on April 6, 1994, and the action item was closed.

New Action Items

There were three new action items generated during the meeting: 1) WHC will provide Ecology and EPA a package which will address the issue of deviations from SW-846; 2) RL will provide a copy of the final memorandum of agreement between EM-40 and EM-60 regarding transition of UO3 from WHC to Bechtel; 3) RL/WHC will transmit a schedule for the PUREX Storage Tunnels Part B to EPA.

- **Additional Discussion**

Mr. Jaraysi requested scheduling a technical meeting to discuss the ventilation system in the PUREX Storage Tunnels and how the system will be affected by the shutdown of the ventilation system in the PUREX Plant. Ms. Robertson pointed out that shutting down the PUREX Storage Tunnels' ventilation system was discussed in the PUREX deactivation emissions comparison documents, which were provided Ecology and the Department of Health (DOH). Ecology and DOH concurred that no emissions increase would result from deactivation activities. EPA requested and was provided a National Emissions Standards for Hazardous Air Pollutants (NESHAPS) application, and EPA subsequently provided approval. Mr. M. Stephenson (WHC) noted that RL/WHC will be providing Ecology an updated version of the PUREX Storage Tunnel Part B, and a meeting is planned in the April 1995 time frame to discuss the Part B, including issues associated with shutdown of the

ventilation systems. Mr. E. Bricker (DOH) requested that DOH be notified when the meeting is scheduled in April 1995.

Ms. L. Russell (Ecology) stated that she intends to visit PUREX within the next month to wrap up Ecology's compliance assessment that was performed approximately a year ago.

- **Scheduling of Next Meeting**

The next PUREX deactivation meeting was scheduled for a videoconference on February 23, 1995.

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Attachment 4

PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
 Federal Building, Room 784B
 Richland, Washington

January 24, 1995
 8:30 a.m. - 10:30 a.m.

Action Items

<u>Action Item</u>	<u>Description</u>
07-26-93:3	Mr. Jaraysi will identify what kind of flexibility Ecology might have to abbreviate the NOI process. CLOSED
01-10-94:2	Ecology will provide attendee lists from the December 10, 1993, and February 22, 1994 public meetings. ACTION: M. Jaraysi (Ecology) CLOSED
04-5-94:1	Ecology will provide RL/WHC a status regarding the organic transfer to DOE-Idaho as soon as possible. ACTION: L. Russell (Ecology) CLOSED
04-5-94:2	The regulators will provide RL/WHC with comments regarding the agenda for the technical discussions and the schedule; and Ms. J. Robertson (WHC) will finalize the agenda and dates. ACTION: Ecology, EPA, DOH/J. R. Robertson (WHC) CLOSED
04-5-94:3	The regulators will provide RL/WHC with comments regarding the project management plan by the end of April 1994. ACTION: Ecology, EPA, DOH CLOSED
04-5-94:4	WHC will provide the public involvement information bulletin and draft public involvement plan to the regulators as soon as possible. ACTION: W. Jasen (WHC) CLOSED

04-5-94:5 Ecology will contact HEAL to follow up on their comments and determine whether or not a subsequent meeting is necessary.
ACTION: M. Jaraysi (Ecology)

CLOSED

04-5-94:6 WHC will provide EPA and DOH with the April 1994 list of PUREX near-term activities.
ACTION: G. J. LeBaron (WHC)

CLOSED

04-5-94:7 WHC will provide the regulators the approved work plan for transferring D-5 and E-6 material.
ACTION: G. J. LeBaron (WHC)

CLOSED

01-24-95:1 RL/WHC will provide Ecology and EPA a package which will address the issue of deviations from SW-846.
ACTION: F. Ruck and R. Bhatia (WHC)

OPEN

01-24-95:2 RL/WHC will provide a copy of the final memorandum of agreement between EM-40 and EM-60 regarding transition of UO3 from WHC to Bechtel.
ACTION: G. LeBaron (WHC)

OPEN

01-24-95:3 RL/WHC will transmit a schedule of the PUREX Storage Tunnels Part B permit application to EPA.
ACTION: M. Cline (WHC)

OPEN

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Attachment 5

**PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
Federal Building, Room 784B
Richland, Washington**

**January 24, 1995
8:30 a.m. - 10:30 a.m.**

PUREX Deactivation Flushing DQO Document Presentation

PUREX Deactivation Flushing DQO Document

- **Informal comments received by RL/WHC**
 - **EPA**
 - **ca. November 7, 1994**
 - **land disposal restrictions**
 - **resolution - letter from RL to EPA**

 - **Ecology**
 - **November 16, 1994**
 - **resolved - December 13, 1994 text changes**
 - **January 7, 1995**
 - **resolved - except Comments 4 and 7**
 - **deviations from SW-846**
 - **data validation**

PUREX/003
1-24-95

- **Proposed resolution of Ecology comments**
 - **Issue summary letter for each deactivation loop**
 - **QA/QC and matrix spike/duplicate w/i laboratory limits**
 - **provide information on holding times**
 - **copies of chain of custody**
 - **document deviations from laboratory procedure**
 - **Additionally, logs of sampling and analysis activities available for review**
- **Issuance of summary letter and LDR letter resolves PUREX Deactivation Flushing DQO**
 - **signatures**

DEPARTMENT OF ECOLOGY

January 6, 1995

TO: Moses Jaraysi
FROM: Laura Russell *Laura*
SUBJECT: Comments on PUREX DQO Document #WHC-SD-EN-TI-283, Rev. 0

The comments below are on the revised draft DQO document. The first draft (Draft A) was dated September 22, 1994.

- o Page 2, Section 2.0: The reference to designation limits of WAC 173-303-090 should be changed to WAC 173-303-070. ✓
- o Page 2, Section 2.1, Factor 1: The last sentence should be changed to read, "Whenever process knowledge is used as a decision variable, written justification will be provided for approval to Ecology prior to implementation of the decision." ✓
- o Page 4, Table 1: In the category of "Sufficiency of Process Knowledge" under the "Assumptions" box, a reference to Section 2.1, Factor 1 should be added. ✓
- o Page 6, Section 6.0: A sentence should be added that reads, "Deviations from SW-846 methods shall be provided to Ecology for review and approval."
- o Page 6, Section 6.0: Additional sentences should be added that read, "The full target list of analytes possible by the methods outlined in Table 5 will be done and the values presented to Ecology. All radiological data for the final sample will also be provided to Ecology."
- o Page 11, Section 8.0, second paragraph. The last sentence should be changed to read, "... will have to be provided for approval by Ecology prior to sampling and analysis."
- o Page 11, Section 8.0, last paragraph: The first sentence should be changed to read, "All analytical data associated with the final flush sample will be validated in accordance with SW-846 methods."

Also, Alex should review the DQO document prior to formal approval. I am faxing a copy of this memo to Mr. R. Bhatia at WHC so he can begin addressing my comments.

Mr. Dan Duncan
U.S. Environmental Protection Agency
1200 6th Avenue, Mail Stop HW-103
Seattle, Washington 98101

Dear Mr. Duncan:

REVIEW OF DATA QUALITY OBJECTIVES FOR THE PLUTONIUM-URANIUM EXTRACTION
FACILITY DEACTIVATION FLUSHING

The U.S. Department of Energy, Richland Operations Office, U.S. Environmental Protection Agency, State of Washington Department of Ecology, and Westinghouse Hanford Company (WHC) have been involved in data quality objective (DQO) discussions concerning deactivation flushing at the Plutonium-Uranium Extraction Facility (PUREX). To document discussions held in the DQO meetings, document WHC-SD-EN-TI-283, Revision 0, "Data Quality Objective for PUREX Deactivation Flushing," was generated and transmitted for your review and comment.

The memorandum to Mr. Rhavi Bhatia, WHC, dated November 2, 1994, transmitting your comments was received. The attached documentation is being transmitted to address your comments based upon clarification received during a telephone conversation with you and Mr. Mike Stephenson, WHC. You requested information regarding Land Disposal Restriction notifications from PUREX to Tank Farms associated with underground waste transfers.

Enclosure 1 is procedure PO-240-200 D-4, "Handle U Cell Waste and Transfer to Underground Storage." This procedure is used for underground transfers from Tank U3 or Tank U4 at PUREX to Tank Farms. Section G of this procedure, "Perform Land Disposal Restriction (LDR) Notification," describes the procedure used when performing LDR notifications. Enclosure 2 is a data package associated with a recent transfer to Tank Farms and contains completed forms used in this procedure for LDR notifications.

Enclosure 3 is procedure PO-320-009 D-1, "Perform Sump Handling and Tank F18 Disposal." This procedure is used for underground transfers from Tank F18 at PUREX to Tank Farms. Section G of this procedure, "Perform LDR Notification," describes the procedure used when performing LDR notifications. Enclosure 4 is a data package associated with a recent transfer to Tank Farms and contains completed forms used in this procedure for LDR notifications.

Mr. Dan Duncan

-2-

Should you have any questions regarding this transmittal, please contact me on (509) 376-6798 or Mr. Paul J. Krupin on (509) 372-1112.

Sincerely,

O. A. Farabee, Acting Director
Transition Program Division
DOE Richland Operations Office

Enclosures:

Procedure P0-240-200, Revision D-4
Data Package for P0-240-200
Procedure P0-320-009, Revision D-1
Data Package for P0-320-009

cc: M. Jaraysi, Ecology
D. Lundstrom, Ecology
L. Russell, Ecology
E. M. Greager, WHC
D. G. Hamrick, WHC
G. J. LeBaron, WHC

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Attachment 6

**PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
Federal Building, Room 784B
Richland, Washington**

**January 24, 1995
8:30 a.m. - 10:30 a.m.**

PUREX/UO3 Transition Status

TTU
PUREX/UO₃
1-24-95

PUREX/UO₃
TRANSITION
STATUS

G. J. LeBaron
January 24, 1995

1810000181A

UO₃ TRANSITION

- **Everything is shut off**
 - **Equipment**
 - **Instrument**
 - **Utilities**
- **Equipment removed**
 - **Hand equipment**
 - **Office equipment**
- **Stacks shut down and blanked**
- **Facility vacated and locked**
- **Memorandum of Agreement about to be signed by WHC & BHI**

UO₃ PUNCH LIST ITEMS

- **Reroof 224UA**
- **Blank water line**
- **Blank steam line**
- **Remove 90-day pad**
- **Provide list of hazardous substances left**

PUREX CANYON

- Flushed and sampled K cell and G & R cells (A flush)
- Flushed and sampled TK 156
- Flush in progress
 - Cladding waste
 - Backcycle waste
 - TK G7
 - L-Cell

PUREX CANYON (Cont'd)

- **Disposing of D5/E6 process solutions**
 - **49 batches - 12 done**
 - **2-month delay due to inventory problems**
 - **Criticality limit raised to 0.033 g/l or ~500 g/batch**
 - **35 batches - 12 done**

FUEL DISPOSITION

- Design of special tools ~85% complete
- Some tools are being fabricated
- EA signed and sent to DOE for review

N-CELL

- 4 glove boxes cleaned out (8 to go)
 - Removing small items
 - Tubing
 - Valves
 - Pumps

F11 CONCENTRATOR

- 90,000 gallons already boiled off
- Additional 90,000 gallons collected
 - Restarted F11 on January 16, 1995
 - Boil off at ~3 gal/min (4320 gal/day)

NITRIC ACID

- **Physical preparations for shipment completed**
- **Samples shipped to BNFL**
- **EA is being reworked to incorporate stakeholder's comments**

VENTILATION DEACTIVATION

- **Conceptual and formal design of changes about half done**

END POINT CRITERIA

- **Drafted and in initial review**

UPCOMING WORK

- Continue flushing/disposing of D5/E6 process solutions
- Issue EA/start shipping fuel upon receipt of FONSI
- Continue clean out N-Cell
- Operate F11 as required
- Issue nitric acid EA
- Continue ventilation design/electrical design
- Start White Room ventilation modification
- Review end point criteria

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Attachment 7

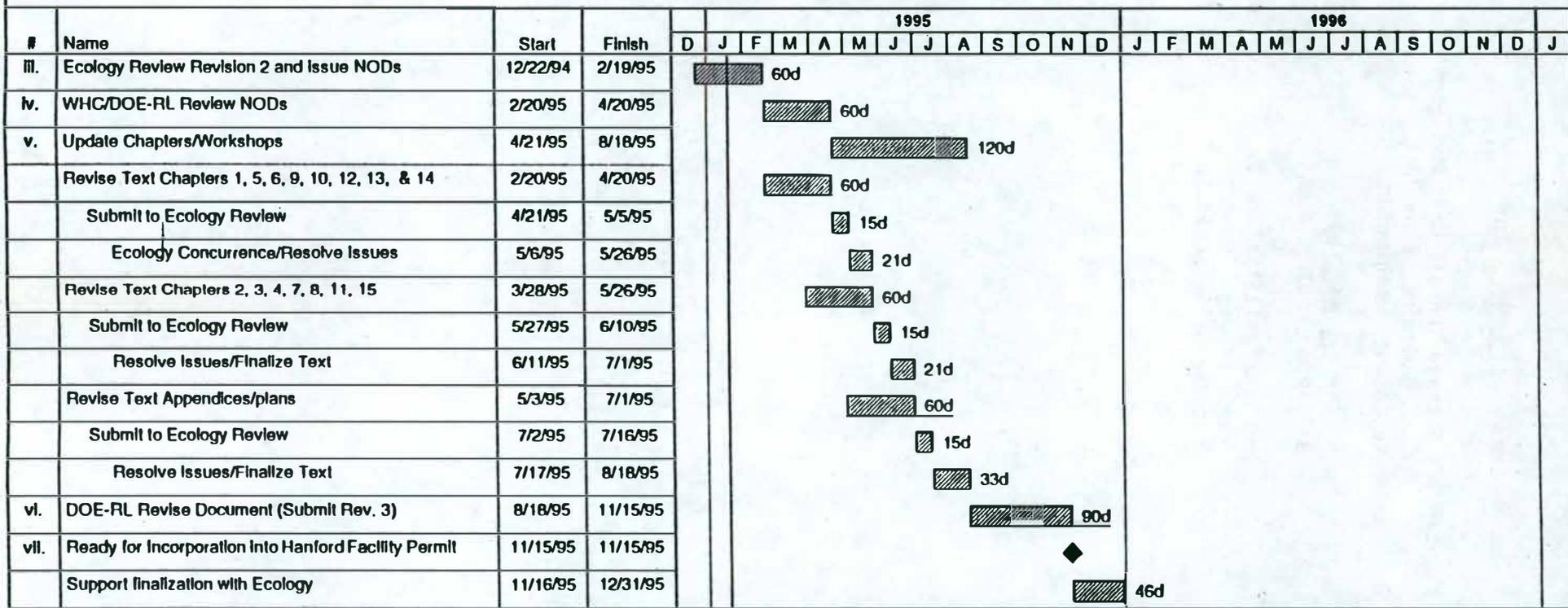
**PUREX Plant/PUREX Storage Tunnels Unit Managers' Meeting
Federal Building, Room 784B
Richland, Washington**

**January 24, 1995
8:30 a.m. - 10:30 a.m.**

**Hanford Facility Permit
PUREX Storage Tunnels
Unit Inclusion Schedule**

1-24-95
-PUREX

Hanford Facility Permit PUREX Storage Tunnels Unit Inclusion Schedule



File: PUREX-B.MPW
Date: 1/18/95
Permitting Lead: M. W. Cline

Scheduled [Hatched] Completed [Solid] Milestone ◆

2001 02/27/03

Distribution:

B. A. Austin	WHC	B2-35
J. K. Bartz	GSSC	R3-82
R. A. Bhatia	WHC	H6-23
R. C. Bowman	WHC	H6-24
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
D. J. Carrell	WHC	H6-22
C. E. Clark	RL	A5-15
M. W. Cline	WHC	H6-24
A. W. Conklin	DOH	
D. L. Duncan	EPA Region 10	HW-106
B. G. Erlandson	WHC	H6-20
O. A. Farabee	RL	R3-79
R. X. Gonzalez	RL	R3-79
L. L. Grant	DOH	
E. M. Greager	WHC	H6-20
D. G. Hamrick	WHC	S6-15
D. G. Harlow	WHC	S6-19
J. P. Hayfield	WHC	S6-18
M. N. Jaraysi	Ecology	B5-18
W. G. Jasen	WHC	S6-17
R. C. King	Ecology, Lacey	
G. J. LeBaron	WHC	S6-19
J. J. Luke	WHC	H6-25
J. R. Markillie	GSSC	B1-42
E. M. Mattlin	RL	A5-15
T. M. Michelena	Ecology, Lacey	
F. R. Miera	RL	A5-15
M. R. Morton	BHI	X5-55
S. M. Price	WHC	H6-23
J. E. Rasmussen	RL	A5-15
J. R. Robertson	WHC	H6-30
F. A. Ruck III	WHC	H6-23
M. J. Stephenson	WHC	H6-30
S. D. Stites	RL	A5-15
G. T. Tebb	Ecology	B5-18
B. D. Williamson	WHC	B3-15
RCRA Files/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: PUREX, TS-2-6 [Care of EDMC, 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
Stop HW-074 (Records Center)

Please send comments on distribution list to K. E. Knox, WHC (H6-23),
(509) 372-3596.

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