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Meeting Minutes Transmittal

325 HAZARDOUS WASTE TREATMENT UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington

March 7, 1996
2:00 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.

Charles R. Delannoy Date: 4/4/96
Charles R. Delannoy, Project Manager, RL

Jeanne J. Wallace Date: 4/4/96
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

325 Hazardous Waste Treatment Unit, PNL Concurrence

Glenn T. Thornton Date: 4/4/96
Glenn T. Thornton, 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 5 - Hanford Facility Dangerous Waste Permit Application, General Information, DOE/RL-91-28



Attachment 1

325 HAZARDOUS WASTE TREATMENT UNITS
 Project Managers Meeting
 Ecology Kennewick Office, Conference Room 4
 Kennewick, Washington

March 7, 1996
 2:00 p.m. to 3:00 p.m.

Agenda

1. Approval of Past Project Managers Meeting Minutes (Ecology/RL/PNNL)
2. 325 HWTUs Part B Permit Application, WORKING DRAFT, Rev. 1 (Ecology/RL/PNL)
 - Document Status (Ecology)
 - Part B Application Development (Ecology/RL/PNNL)
 - Discuss timing and scheduling of workshop sessions
3. Hanford Facility Dangerous Waste Permit Application, General Information, DOE/RL-91-28 (PNNL - Handout)
4. Status of 325 HWTUs NOI Part A for Tank Storage (PNNL/RL)
5. Status on Closeout of Silver Letter Response Items (PNNL/RL)
6. Status on off-normal event from 2/23/96 (PNNL/RL)
7. Status of Action Items (Ecology/RL/PNL)
 - 11-08-95:2 Administrative withdrawal of 3100 portion of the HWTU Part A, as requested in May 18, 1994 letter to RL
 ACTION: C. DeLannoy (RL)
 OPEN
 - 12-07-95:1 Use of metric/English measurements in documents
 ACTION: B. Day(PNL)/b. DeLannoy (RL)
 Closed 1/11/96
 - 01/11/96:1 Obtain a copy of "Metric Conversion Aids" for J. Wallace (Ecology)
 ACTION: D. Lutter (PNNL)
 CLOSED 1/12/96 - Document delivered to Ecology on 1/12/96
8. General Discussion (Ecology/RL/PNL)
9. New Action Items
10. Next Project Managers Meeting (Ecology/RL/PNL)
 - Next Meeting
 April 4, 1996
 337 Building, Mt. Hood Room, Richland, Washington
 - Proposed topics

Attachment 2

325 HAZARDOUS WASTE TREATMENT UNITS
PROJECT MANAGER MEETING
Ecology Kennewick Office, Room 4
Kennewick, Washington

March 7, 1996
2:00 p.m. to 3:00 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Project Managers Meeting Minutes

The January 11, 1996 Project Manager Meeting minutes were approved. D. Lutter (PNNL) noted that there was no Project Manager Meeting held in February 1996.

2. 325 HWTU's Part B Permit Application, WORKING DRAFT, Rev. 1

• Document Status

J. Wallace (Ecology) reported that review of the working draft is on hold pending finalization of Ecology's reorganization and work load assessment. D. Lutter (PNNL) expressed concern that the 325 schedule will be impacted. J. Wallace (Ecology) acknowledged the potential for impacting the schedule. Ms. Wallace stated that her intent is to write an letter of extension to DOE-RL/PNNL.

D. Lutter (PNNL) inquired about the potential impacts on the schedule to incorporate the 325 Facility into Modification C of the Hanford Facility Dangerous Waste Permit Application. J. Wallace (Ecology) responded that the schedule could be impacted, but the date for the modification was flexible. D. Lutter (PNNL) noted that during the last Steering Committee meeting, M. Jaraysi (Ecology) provided a schedule which slated 325 as a high priority item for Modification C. H. Tilden (PNNL) added that the schedule for Modification C was not discussed in detail at the Steering Committee meeting, and the dates should be flexible.

• Part B Application Development

-Discuss timing and scheduling of workshop sessions

D. Lutter (PNNL) stated that workshops are scheduled to begin March 18, 1996. J. Wallace (Ecology) responded that the workshops will not occur at that time, due to Ecology's reorganization. Regarding the Part B Permit Application, Ms. Wallace indicated that additional draft comments will be generated.

3. Hanford Facility Dangerous Waste Permit Application, General Information, DOE/RL-91-28

D. Lutter (PNNL) stated that a copy of the General Information document was transmitted to Ms. Wallace. J. Wallace (Ecology) acknowledged receipt of the document. H. Tilden (PNNL) stated that in an effort to meet the schedule for incorporation of the units slated for Modification B of the Hanford Facility Dangerous Waste Permit Application, M. Jaraysi (Ecology) will identify the lead to coordinate comments generated from review of the General Information document.

D. Lutter distributed a handout describing the status of the HFP, General Information Portion (Attachment 5).

4. Status of 325 HWTU's NOI Part A for Tank Storage

H. Tilden (PNNL) stated that PNNL has identified the need for additional container storage capacity to the Part A permit application. PNNL is requesting Ecology approval to amend the existing Notice of Intent (NOI) by providing page changes instead of generating a new NOI at a much higher cost.

H. Tilden (PNNL) explained that the original intent of the NOI was to add the collection tank that will replace the current 325 HWTU Building discharges to the Radioactive Liquid Waste System (RLWS). The additional container storage capacity will provide a volume increase to allow for expanded treatment in the future.

J. Wallace (Ecology) asked if the existing tank system under the Shielded Analytical Laboratory (SAL) will have to be modified. D. Saueressig (WHC) responded that it would be addressed in the Part B permit application. M. Reiss (PNNL) explained that it will be tied directly into the new 3,000 gallon tank, which will receive waste from the 325 A-Cell slab tanks, the 325 B-Cell 325 gallon tank, and the sink system in Room 528 in the 325 HWTU. J. Wallace (Ecology) pointed out that there are the slab tanks and two Treatment, Storage and Disposal (TSD) sources, and asked if the NOI will be modified to address the changes necessary to accommodate those waste sources. D. Saueressig (WHC) responded that the Part A will address those issues.

J. Wallace (Ecology) indicated that she would review the Part A and discuss the proposal with M. Jaraysi (Ecology).

5. Status on Closeout of Silver Letter Response Items

H. Tilden (PNNL) stated that J. Wallace (Ecology) signed a document closing one of the items. Mr. Tilden stated that there are 31 laboratory-related issues, and approximately 11 sitewide, cross-cutting issues are expected to be closed this fiscal year. M. Vargas (DOE-RL) noted that there are 29 issues associated with the 340 Building.

6. Status on Off-Normal Event from 2/23/96

M. Reiss (PNNL) stated that there were two issues associated with the off-normal event.

One of the containers in question came from a batch of three from a lab

in 325. The batch was listed at a pH of 6 - 7. The pH of the first container was checked at 7 and poured directly in the sink system to go to the 340 Facility. The second container was poured directly into the sink. The technician checked the pH of the residue in the RLWS sink from the second container and discovered a problem with the pH. The third container was checked and the pH was approximately 2, and it was sent back to the waste generator.

A qualification check was performed on the pH, which was about 1.5. Mr. Reiss stated that part of issue is improper characterization. The lab in question only does two distinct waste streams, and one of the waste streams contained about 8 mils of concentrated sulfuric acid, which was not recorded on the paperwork.

The second issue was that on the same day (2/23/96), a container from a series of unknowns was characterized and designated as nonhazardous, low-level waste. The container was poured down the sink by the same staff member, who noted that a portion of the waste appeared slightly insoluble with the flush water. The paperwork did not indicate the waste was organic.

The first issue was classified as an off-normal event; and the 340 Facility was notified of the second issue and that further investigation was necessary.

The container that the "second issue" waste came from was identified. The residual liquid from the container was transferred into a sample container and checked for the presence of organic vapors, and none were observed. A slight buildup of a clear layer was observed during transferral of the residual liquid. A flash point was run on the layer, which came back at 116 degrees Fahrenheit.

J. Wallace (Ecology) asked if a root cause analysis will be performed. Mr. Reiss responded affirmatively, and he also described the testing performed, which indicated there were no issues associated with the 340 Facility safety system. J. Wallace (Ecology) expressed concern regarding PNNL's designation procedure. S. Warren (PNNL) responded that waste designation training will be required for personnel performing designations, and the procedure is scheduled for implementation by April 15, 1996. G. Thornton (PNNL) added that in response to Ecology's compliance letter regarding the off-normal event, several action items have been generated for PNNL to address waste management issues, including communications, training and procedures.

J. Wallace (Ecology) requested a status regarding the waste management issue to the point of resolution.

7. Status of Action Items

11-08-95:2 Administrative withdrawal of 3100 portion of the HWTU Part A, as requested in May 18, 1994 to RL.
 OPEN: C. Delannoy (DEO-RL) stated that RL's response letter has been transmitted to Ecology. J. Wallace (Ecology) stated that the action item would be closed upon receipt of

the letter.

12-07-95:1 Use of metric/English measurements in documents.
CLOSED: This action item was closed during the 01-11-96
Project Managers Meeting.

01-11-96:1 Obtain a copy of "Metric Conversion Aids" for J. Wallace
(Ecology).
CLOSED: The document was delivered to Ecology on 01-12-96,

8. General Discussion

J. Wallace (Ecology) provided a brief update regarding Ecology's reorganization.

9. New Action Items

03-07-96:1 Write an extension letter to DOE-RL/PNNL
regarding the potential delay in the FY 1996 schedule due to
Ecology issues.
Action: J. Wallace (Ecology)

03-07-96:2 Draft a letter to Ecology regarding the proposal to amend
the NOI for tank storage.
Action: M. Schlender/H. Tiltan (PNNL)

03-07-96:3 Provide a response to Ecology's voluntary compliance letter
associated with Kevin Christensen, Ecology, visit.
Action: T. Lazarski (PNNL)

10. Next Project Managers Meeting

- Next Meeting
April 4, 1996, at the 337 Building, Mt. Hood Room,
Richland, Washington.
- Proposed Topics
Proposed topics may be submitted to D. Lutter (PNNL).

Attachment 4

325 HWTU
Project Managers Meeting
Ecology Kennewick Office, Room 4
Kennewick, Washington

March 7, 1996
1:00 p.m. to 2:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
11-08-95:2	Administrative withdrawal of 3100 portion of the HWTU Part A, as requested in May 18, 1994 to RL. OPEN: C. Delannoy (DOE-RL) stated that RL's response letter has been transmitted to Ecology. J. Wallace (Ecology) stated that the action item would be closed upon receipt of the letter.
12-07-95:1	Use of metric/English measurements in documents. CLOSED: This action item was closed during the 01-11-96 Project Managers Meeting.
01-11-96:1	Obtain a copy of "Metric Conversion Aids" for J. Wallace. CLOSED: The document was delivered to Ecology on 01-12-96,
03-07-96:1	Write an extension letter to DOE-RL/PNNL regarding the potential delay in the FY 1996 schedule due to Ecology issues. Action: J. Wallace (Ecology)
03-07-96:2	Draft a letter to Ecology regarding the proposal to amend the NOI for tank storage. Action: M. Schlender/H. Tiltan (PNNL)
03-07-96:3	Provide a response to Ecology's voluntary compliance letter associated with Kevin Christensen, Ecology, visit. Action: T. Lazarski (PNNL)

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Attachment 5

**325 HAZARDOUS WASTE TREATMENT UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington**

**March 7, 1996
2:00 p.m. to 3:00 p.m.**

**Hanford Facility Dangerous Waste Permit Application, General Information,
DOE/RL-91-28**

Author: Harold T II Tilden at ~PNL97
Date: 3/6/96 4:01 PM
Priority: Normal
Subject: STATUS: HFP, GENERAL INFORMATION PORTION

----- Message Contents -----

This status report is provided in advance of tomorrow's agenda item.
It may then be discussed as needed.

Moses Jaraysi has determined that he will delegate the review of the Hanford Facility Permit Application, General Information Portion to an Ecology staff member to be determined. Moses is too busy with the TPA negotiations, etc. to complete this review. The Ecology staff member will be chosen this week (i.e. by March 8). That staff member will be chosen based on their workload, as Ecology has recently performed a workload analysis for their staff. That staff member will then coordinate the review of this document within Ecology. Moses intends to avoid impacts to the HFP, Mod C review cycle by delegating this.

If you have questions, we can discuss them at the meeting or at your convenience by calling or cc:Mailing me.

Harold

Distribution:

M. A. Barnard	RL	L4-40
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
C. R. Delannoy	RL	A5-15
G. H. Fess	PNL	P7-79
G. D. Hendricks	GSSC	B1-42
T. Y. Hosaka	PNL	K7-98
d. C. Langstaff	RL	K8-50
D. K. Lutter	PNL	P7-79
S. M. Price	WHC	H6-23
M. H. Schlender	PNL	P7-79
H. T. Tilden II	PNL	P7-79
M. C. Vargas	RL	K8-50
J. J. Wallace	Ecology	B5-18
P. J. Weaver	PNL	P7-35
RCRA Files/GHL	WHC	H6-23

ADMINISTRATIVE RECORD (Two Copies): 324 REC/HLV Closure Plan, S-3-4
 [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

Please send comments on distribution list to D. K. Lutter (P7-79), (509) 376-5631.