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October 22, 1990
Final

Meeting Minutes Transmittal/Approval
Unit Managers Meeting: 616 Nonradioactive
Dangerous Waste Storage Facility (NRDWSF)
420 Golf Club Road
Lacey, Washington

Meeting Held August 15, 1990

Appvl. *Clifford E. Clark* Date: 10/23/90
Clifford E. Clark, Environmental Policy and Permitting, DOE-RL

Appvl. _____ Date: _____
Daniel L. Duncan, EPA Region X Unit Manager

Appvl. *Randal J. Roberts* Date: 10/26/90
Randal J. Roberts, Contractor Representative, WHC

Appvl. *Susan M. Price* Date: 10-23-90
Susan M. Price, Contractor Representative, RCRA Permitting, WHC

Appvl. *Megan E. Lerchen* Date: 10/23/90
Megan E. Lerchen, Unit Manager, Washington State Department of Ecology

PURPOSE: Discuss permitting process.

- Meeting Minutes are attached. Minutes are comprised of the following:
- Attachment #1 - Summary of Meeting Discussion and Commitments
 - Attachment #2 - Agenda
 - Attachment #3 - Attendance List
 - Attachment #4 - Commitments/Agreements Status



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Attachment #1
Summary of Discussion

A. Contingency/Emergency Plans

Ecology commented that the contingency plan was discussed during the 305-B meeting and those same comments apply to 616 NRDWSF. They also felt that applicable portions of the site wide emergency plan that were used in developing the building emergency plan need to be appended/integrated into the units permit. WHC commented that chapter 7 contains an attempt at integrating the other documents without appending the entire documents. Ecology commented that they would like to see the building emergency plan modified reflecting the other documents and an addendum with the applicable portions of the other documents added. They currently have not completed the review of the plan but project completion of the review by the end of September, 1990.

B. Container Labeling

Ecology inquired if the dangerous waste containers have been labeled per DOT regulations. WHC responded that they have labeled the containers with the appropriate DOT labels ~~and have also done the same at the 305-B unit.~~ DOE commented that the storage units will be following the DOT labeling regulations along with other appropriate labels called out by DOE orders. Ecology asked if the labeling was being done at the generators location prior to shipment to 616. WHC commented that this is currently being investigated. *mbh*
CEC

C. Confusion Of Terminology

A discussion ensued over the general confusion between the use of terms in the various documents and discussions. Ecology indicated that the use of "site" and "facility" are commonly used interchangeably. They suggested an individual TSD unit be called "the unit" or "616 unit". The Site Wide Federal Facility Permit will contain definitions for the terms used. DOE commented that the confusion in terms is caused by historic use of the terms and acronyms at the Hanford facility. An attempt has been made in the last several documents reviewed to be consistent in the uses of terminology. In the future if a unit has been called out as a facility, it will be defined or clarified in the beginning of the document. Ecology also stated that there is confusion over the use of "onsite" and "offsite". DOE clarified this point in stating that the site is the Hanford Federal Facility and that the use of these terms should reflect this. The discussion continued on the general need for consistency in the use of terminology.

D. Manifests

A discussion ensued on storage location of manifests. Ecology inquired as to the location where the manifests are kept and the need to identify this location in the permit. WHC replied that copies of the manifest are kept at the 616 unit.

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E. Minor Modifications

Ecology commented that their reply is on page 14 comment #31. This is the same general procedure as found in the Site Wide permit. DOE/WHC will propose the modifications and will submit them to Ecology. If Ecology does not comment on the change in some set time frame the modification will automatically be accepted and added to the permit.

F. Land Description

WHC indicated that there are currently problems associated with locating the units by township, range, and section due to problems with the location of benchmarks. Kaiser Engineers are still working on this problem. It may require the BLM or USGS to reestablish the location of the benchmarks. WHC suggested that a general location of the units may be based on the Hanford quadrants be added to the permit then at a later date when this issue has been resolved the permit could be modified. A discussion ensued on the need for legal locations. Ecology commented that DOE/WHC should be sure that the Hanford Federal Facility boundaries are well established since this will have an impact on the site wide permit. The locations for the specific units within these boundaries can be dealt with later. WHC will check with KEH on the status of establishment of benchmarks and legal locations.

G. Personnel

Ecology commented that they are not clear on the organizational chart on job reporting, who is responsible for specific job tasks (by title), and who should be contacted in case of an emergency at the 616 unit. This needs to be clarified in this document. An organization chart matrixing job titles and reporting responsibilities would be helpful. A general discussion on personnel required to operate the facility ensued. WHC stated that generally it takes approximately 4.5 ^{people} ~~men~~ to support the 616 unit. Ecology inquired as to how many people are at the unit at all times. WHC stated that two people are at the unit. CSC

H. Waste Verification

DOE commented that they and WHC are still working on this issue and stated that this is a site wide issue which will be addressed in the general conditions. Ecology concurred with this but stated that the comment must be put in the NOD comments until this issue has been resolved. DOE stated that they may be proposing a two prong approach, onsite shipments and offsite shipments. Sample verification will be done by the onsite generator. When the waste is shipped offsite the receiving TSD will do verification sampling. The shipment between different TSD units onsite will not require verification at the receiving onsite TSD since it was done at the point of generation. A discussion ensued on verification sampling. Ecology stated that this approach is a mistake and that if one barrel of misidentified waste leaves the Hanford Facility the permit will require 100% verification sampling. WHC inquired about what means of issue resolution are available beyond the unit managers meetings. A general discussion ensued on avenues for issue resolution. DOE commented that currently the 10% RDP

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^{waste} sample shipped offsite would be sampled twice (one at the point of generation and second at offsite disposal facility) and failed to see why additional verification sampling was warranted. DOE/WHC commented that they will present a verification program to Ecology at a future date.

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Attachment #2
Agenda

616 NRDWSF Unit Managers' Meeting
August 15, 1990
420 Golf Club Road
Lacey, Washington

9:00 a.m. - 12:00 a.m.

- o Discuss Ecology review comments on Revision 1 of the 616 Nonradioactive Dangerous Waste Storage Facility Part B Permit Application. (Ecology)

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Attachment #3

Attendance List

<u>Name</u>	<u>Organization</u>	<u>Phone</u> __
Roger Bowman	WHC	509-376-4876
Cliff Clark	DOE/ERD	509-376-9333
Mike Gasser	SWEC	509-376-9830
Teresa Hennig	DOE	509-376-6888
Megan Lerchen	Ecology	206-438-3089
Cathy Louie	SWEC	509-376-9830
Toby Michelena	Ecology	206-438-7016
Richard Pierce	WHC	509-373-4846
Sue Price	WHC	509-376-1653
Michael Romsos	WHC	509-373-4032
Glen Thornton	PNL	509-376-7688
Harold Tilden	PNL	509-376-0499

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Attachment #4
Commitments/Agreements Status

<u>Action Items</u>	<u>Commitments/Agreement Status List</u>
7-23-90:1	Ecology will send a copy of the inspection checklist to DOE. Action Megan Lerchen OPEN
7-23-90:2	The draft Waste Designation Plan will be submitted to Ecology and EPA for review by the first week in August. Action WHC. OPEN
7-23-90:3	The comments from Ecology on the draft Part B Permit application are pending and should be ready by the first or second week in August. Action Megan Lerchen. OPEN
7-23-90:4	The Site Wide Emergency Plan will be supplied to Ecology and EPA. Action Cliff Clark. OPEN
Agreement August 15, 1990.	The next meeting will be held in Lacey, Washington on

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Distribution:

M.R. Adams WHC (L4-92)
M.J. Anthony DOE (A6-95)
J.D. Bauer WHC (B3-15)
L.E. Borneman WHC (B2-19)
R.C. Bowman WHC (H4-57)
E.A. Bracken DOE (A6-95)
L.C. Brown WHC (H4-51)
R.W. Brown WHC (H4-55)
J.W. Cammann WHC (H4-54)
R.M. Carosino DOE (A4-52)
G.D. Carpenter WHC (H4-15)
C.E. Clark DOE (A6-95)
C. DeFigh-Price WHC (B2-20)
W.T. Dixon WHC (B2-35)
G.T. Dukelow WHC (R2-97)
D.L. Duncan EPA
K.R. Fecht WHC (H4-56)
J.R. Freeman-
Pollard WHC (H4-55)
C.J. Geier WHC (H4-57)
T.M. Hennig DOE (A6-80)
R.D. Izatt DOE (A6-95)
J. King SWEC (A4-35)
G.W. Jackson WHC (R2-29)
R.J. Landon WHC (B2-19)
R.E. Lerch WHC (B2-35)
M.E. Lerchen Ecology
D.W. Lindsey WHC (R2-82)
H.E. McGuire WHC (B2-35)
T.M. Michelena Ecology
S.H. Norton WHC (T3-28)
R.D. Pierce WHC (R2-80)
L.L. Powers WHC (B2-35)
S.M. Price WHC (H4-57)
L.W. Roberts WHC (R2-80)
R.J. Roberts WHC (R2-97)
M.R. Romsos WHC (R2-82)
F.A. Ruck III WHC (H4-57)
H.T. Tilden PNL (P7-68)
T.B. Veneziano WHC (B2-35)
S.A. Wiegman WHC (B2-19)
K.A. Woodworth WHC (H4-55)

G.T. Thornton WHC (P7-68)

ADMINISTRATIVE RECORD (616 Nonradioactive Dangerous Waste Storage Facility,
S-6-1) [Care of Susan Wray, WHC (H4-22C)]

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