

PNNL 300 AREA PROJECT MANAGER MEETING  
Waste Management Project/PNNL Facilities  
TEAM Meeting  
Richland, Washington  
December 7, 2021

Meeting Minutes - Approval

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The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated meeting. Signatures denote concurrence with content only and do not imply agreement or commitments.



Digitally signed by Mark D Ellefson  
Date: 2022.01.04 14:14:56 -08'00'

Date: \_\_\_\_\_

Mark Ellefson, Contractor Representative,  
Pacific Northwest National Laboratory



Digitally signed by THOMAS  
MCDERMOTT  
Date: 2022.01.04 14:28:45 -08'00'

Date: \_\_\_\_\_

Thomas M. McDermott, Project Manager,  
Pacific Northwest Site Office



Digitally signed by Holbrook, Edward (ECY)  
Date: 2022.01.05 16:24:12 -08'00'

Date: \_\_\_\_\_

Edward Holbrook, Waste Management Section Manager,  
Washington State Department of Ecology

**PURPOSE:** Discuss Permitting Process

The attached meeting minutes are comprised of the following:

Attachment 1 – Meeting Agenda/Minutes

Attachment 2 – Attendance List

**PNNL 300 AREA PROJECT MANAGER MEETING**  
**Waste Management Project/PNNL Facilities**  
**Meeting held online**  
**December 7, 2021, 9:00 – 10:00 a.m.**

**Agenda**

- 1) Approval August 10, 2021 Meeting Minutes (Ecology/PNSO/PNNL)
- 2) Discussion Items:
  - a) Permit Team Update
  - b) 325 HWTUs Quarterly Permit Modifications (PNSO/PNNL)
  - c) Hanford RCRA Permit Revision 9 Development (Ecology/PNSO/PNNL)
    - Status of CAPs
    - Status of Closure Addendum
    - Status of Waste Analysis Plan Addendum
    - Status of Preparedness and Prevention Addendum
    - Schedule Change Requests
  - d) Sitewide general permit condition II.A.2
  - e) Waste Volumes (PNSO/PNNL)
- 3) Action Items from Previous Meeting:  
None.
- 4) Next Meeting:  
  
February 8, 2021

**PNNL 300 AREA PROJECT MANAGER MEETING**  
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**Minutes**

**Attendees:** Deborah Alexander (ECY), Ty Buckendorf (PNNL), Jackson Davis (ECY), Mark Ellefson (PNNL), Edward Holbrook (ECY), Tom McDermott (PNSO), Trevor VanArsdale (PNNL), Becky Wiegman (PNNL)

- 1) Approval August 10, 2021 Meeting Minutes (Ecology/PNSO/PNNL)
- 2) Discussion Items:
  - a) Permit Team Update  
Edward Holbrook will be filling in as the 325 permit project manager for Ecology until the position is permanently filled.
  - b) 325 HWTUs Quarterly Permit Modifications (PNSO/PNNL)  
PNNL submitted a Class 1 permit modification for the 325 RPL BEP to Ecology for informal review on October 25, 2021. Ecology stated it is likely informal review of the modification will not be completed before the permit blackout period.
  - c) Hanford RCRA Permit Revision 9 Development (Ecology/PNSO/PNNL)
    - Status of CAPs  
Sitewide negotiation of the Process CAP is ongoing.  
  
Ecology is in the process of scheduling Major Themes workshops for Preparedness and Prevention CAP.  
  
A draft of the updated closure addendum has been submitted to Ecology, however, PNNL has not yet made much progress on the 3714 sampling and analysis plan (SAP). PNNL has hired a highly qualified permit writer (Leah Hare) in the research group who will be helping complete the SAP and possibly some other sections of the permit.
    - Status of Waste Analysis Plan Addendum  
PNNL has been working through some matrix items. Progress is anticipated to pick up following completion of the 3714 pad SAP.
    - Status of Preparedness and Prevention Addendum  
Ecology stated that with the major themes workshops being scheduled for this addendum, resolution of matrix items that are determined to be

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major themes will need to wait for sitewide agreements made during those workshops. If the matrix item is not in major themes, resolutions for those items will not have to wait.

It is unclear at this point how the major themes workshops will effect schedule for this addendum.

- Schedule Change Requests  
None at this time.

d) Sitewide general permit condition II.A.2

PNNL routinely performs a regulatory analysis of requirements to ensure implementations are in place. During a review of the RCRA permit, it was identified that sitewide general permit condition II.A.2 had not been implemented. This condition states:

*A hard copy of Permit Attachment 4 and the unit-specific BEP/FRP will be physically located and maintained at each Dangerous Waste Management Unit group specified in 14 Attachment 4A, BEP Location column. [WAC 173-303-350]*

While Attachment 4 is made readily available online, a hard copy was not physically located with the 325 BEP. This was remedied immediately by printing a hard copy and locating the copy with the BEP.

PNNL was unclear about whether documentation in these minutes replaces the need to report on the Annual Noncompliance Report. Edward Holbrook stated he will take an action to check with the compliance group to see if a permit non-compliance would not need to be reported in the annual non-compliance report if it was reported and documented elsewhere.

Action update: PNNL reviewed previous years' Annual Noncompliance Reports. DOE-RL specifically states in these reports that non-compliances documented in Project Manager Meeting Minutes are not reported in the Annual Noncompliance Report. This was discussed with Mr. Holbrook on 12/10/21 and he agrees this action is no longer needed for this one deficiency brought to Ecology's attention.

e) Waste Volumes (PNSO/PNNL)

From August 2021 thru November 2021, 37 containers of hazardous waste were shipped to Clean Harbors, and 7 containers of mixed waste were shipped (2 to CWC and 5 to PFW).

PNNL stated that Clean Harbors is having COVID related issues with staffing and waste backlog, and trucks are moving slowly across the country. Two manifest exception reports have been submitted to Ecology, and another is in process. Clean Harbors expects these issues to take 9 months to a year to

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clear up. PNNL will continue to keep Ecology informed, and will track to ensure delinquent manifests arrive.

3) Action Items:

None.

4) Next Meeting:

February 8, 2021

ship month	SHIPPING_LOCATION	SHIP_TO	WASTE_TYPE_DESC	Count of DRUM_ID	Sum of CALC_NET_WGT
August 2021	350D	Manifest: Clean Harbors Aragonite, LLC	NonRad	6	59.73
		Manifest: Clean Harbors Aragonite, LLC Total		6	59.73
	<b>350D Total</b>			<b>6</b>	<b>59.73</b>
<b>August 2021 Total</b>				<b>6</b>	<b>59.73</b>
<b>Total</b>				<b>6</b>	<b>59.73</b>
ship month	SHIPPING_LOCATION	SHIP_TO	WASTE_TYPE_DESC	Count of DRUM_ID	Sum of CALC_NET_WGT
september 2021	325	Manifest: CWC	MWTRU	2	30.58
		Manifest: CWC Total		2	30.58
	<b>325 Total</b>			<b>2</b>	<b>30.58</b>
350D	350D	Manifest: Clean Harbors Aragonite, LLC	NonRad	8	66.57
		Manifest: Clean Harbors Aragonite, LLC Total		8	66.57
	<b>350D Total</b>			<b>8</b>	<b>66.57</b>
<b>Total</b>				<b>10</b>	<b>97.15</b>
ship month	SHIPPING_LOCATION	SHIP_TO	WASTE_TYPE_DESC	Count of DRUM_ID	Sum of CALC_NET_WGT
October 2021	350D	Manifest: Clean Harbors Aragonite, LLC	NonRad	9	162.05
		Manifest: Clean Harbors Aragonite, LLC Total		9	162.05
	<b>350D Total</b>			<b>9</b>	<b>162.05</b>
<b>October 2021 Total</b>				<b>9</b>	<b>162.05</b>
<b>Total</b>				<b>9</b>	<b>162.05</b>
ship month	SHIPPING_LOCATION	SHIP_TO	WASTE_TYPE_DESC	Count of DRUM_ID	Sum of CALC_NET_WGT
November 2021	325	Manifest: Perma-Fix Northwest	MW	5	339.22
		Manifest: Perma-Fix Northwest Total		5	339.22
	<b>325 Total</b>			<b>5</b>	<b>339.22</b>
350D	350D	Manifest: Clean Harbors Aragonite, LLC	NonRad	14	385.19
		Manifest: Clean Harbors Aragonite, LLC Total		14	385.19
	<b>350D Total</b>			<b>14</b>	<b>385.19</b>
<b>Total</b>				<b>19</b>	<b>724.41</b>
<b>Grand Total</b>			<b>MW</b>	<b>7</b>	<b>370</b>
			<b>Non-Rad</b>	<b>37</b>	<b>673.5</b>