

**START**

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Meeting Minutes Transmittal

325 HAZARDOUS WASTE TREATMENT UNITS  
Project Managers Meeting  
337 Building, Mt. Rainier Room, 3rd Floor North  
Richland, Washington

October 9, 1996  
2:00 p.m. to 2:30 p.m.



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

Mary F. Jarvis Date: Nov. 04, 1996  
Mary F. Jarvis, Project Manager, RL

Greta P. Davis Date: Nov. 4, 1996  
Greta P. Davis, Project Manager, Washington State Department of Ecology

325 Hazardous Waste Treatment Units, PNNL Concurrence

Shelly L. Warren Date: 11-4-96  
Shelly L. Warren, Contractor Representative, PNNL

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

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Agenda

1. Approval of Past Project Managers Meeting Minutes (Ecology/DOE-RL/PNNL)
2. 325 HWTUs Part B Permit Application, WORKING DRAFT, Rev. 1 (Ecology/DOE-RL/PNNL)
  - Document Status (Ecology)
  - Part B Application Development (Ecology/DOE-RL/PNNL)-Discuss scheduling and progress of workshop sessions
3. Status of 325 HWTUs Part A Rev 4 Submittal (Ecology/DOE-RL/PNNL)
4. Status of Silver List Issues (Ecology/DOE-RL/PNNL)
5. Efficiency Issues (Ecology/DOE-RL/PNNL)
6. Schedule Variance and Funding (Ecology/DOE-RL/PNNL)
7. Status of Action Items (Ecology/DOE-RL/PNNL)
  - 08-01-96:1 Ecology will provide final comments on the 325 HWTU Part B permit application by the next workshop on August 6, 1996.  
ACTION: G. Davis (Ecology)
  - 08-01-96:2 Resolve actions from the past 325 Part B workshop by the next workshop on August 6, 1996.  
ACTION: Ecology and PNNL
  - 09-05-96:1 Review the Part B Permit Application workshop schedule to determine the amount of work scope that can be completed in FY96.  
ACTION: B. Day (PNNL)  
CLOSED
8. General Discussion (Ecology/DOE-RL/PNNL)
9. New Action Items
10. Next Project Managers Meeting (Ecology/DOE-RL/PNNL)
  - Next Meeting

325 HAZARDOUS WASTE TREATMENT UNITS  
PROJECT MANAGER MEETING  
337 Building, Mt. Rainier Room  
Richland, Washington

October 9, 1996  
2:00 p.m. to 2:30 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Project Managers Meeting Minutes

The September 5, 1996 Project Manager Meeting (PMM) minutes were approved.

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

- Document Status

D. Crossley (PNNL) stated that PNNL is reviewing comments received from Ecology during the two workshops. M. McCoy (PNNL) has been assigned as the PNNL project manager for the 325 HWTU. D. Crossley will still be available for assistance while M. McCoy is transitioning.

- Part B Application Development

-Discuss scheduling and progress of workshop sessions

D. Crossley (PNNL) referred to the negotiations between DOE-RL and Ecology regarding a new protocol for the Waste Analysis Plan (WAP), and he inquired about proceeding with the current WAP. T. McKarns (DOE-RL) recommended that PNNL focus on areas of the Part B permit application that are not related to the WAP. D. Crossley pointed out that the workshops are scheduled for completion in two months, and expressed concern for meeting the schedule.

J. Wallace (Ecology) requested that attendance at the workshops be limited in an effort to reduce cost. It was also agreed among the parties to conduct the workshops following the PMM as a cost- and time-saving effort.

M. McCoy (PNNL) provided a list of action items generated from the previous two workshops, and suggested that he and G. Davis (PNNL) meet after the PMMs today to status the actions.

## 3. Status of 325 HWTUs Part A (Form 3) Rev 4 Submittal

M. Jarvis (DOE-RL) stated that PNNL submitted Rev 4 of the 325 HWTUs Part A Application (Form 3) to DOE-RL on schedule in July 1996; however, DOE-RL has not submitted Rev 4 to Ecology. M. Jarvis (DOE-RL) reported that an off-normal occurrence took place during waste removal from 331, when too much material was sent to 325 for treatment. J. Wallace (Ecology) and G. Davis (Ecology) acknowledged receipt of notification of the off-normal occurrence. M. Jarvis stated that she reviewed Rev 4 following the off-normal occurrence to determine whether the waste treatment level specified in the document would cover the amount in the off-normal occurrence. During her review she noted that the amount stated in Rev 4, 440 liters, should probably have been stated in gallons like rev 3.

J. Wallace (Ecology) asked if the liquid was discharged to the RLWS. B. Day (PNNL) explained that after the waste in question is treated, the liquid phase is discharged to the RLWS (nonhazardous), and there is a hazardous solid component remaining that is managed separately.

B. Day (PNNL) addressed the issue of changing the 440 liters to 440 gallons in Rev 4. B. Day suggested that in lieu of drafting another Notice of Intent (NOI), that PNNL provide an addendum to the current NOI to increase the limits, possibly opening up the comment period again for a specified amount of time, and then following with the Form 3 with the correct numbers. The regulations provide for a minimum of a 150-day review, but do not provide a maximum. H. Tilden (PNNL) added that the regulations require submittal of proposed changes no less than 150 days to submitting the revised Form 3, and that a revised Form 3 has not been submitted yet.

J. Wallace (Ecology) stated that the volumes being treated should cease until the Part A permit application is modified. H. Tilden (PNNL) stated that PNNL has placed administrative limits to comply with the 55-gallon a day limit outlined in the Form 3 Rev 3. J. Wallace took an action to provide a response by the next PMM (11-4-96) regarding the submittal of an NOI addendum, required public comment and modification of the limits in Rev 4.

## 4. Status of Silver List Issues

M. Jarvis (DOE-RL) reported that there were 26 total Silver list items; 18 were closed previously; six more were closed on 9-30-96, and two remain open. H. Tilden (PNNL) provided six close-out forms to J. Wallace (Ecology) for review and approval. One of the remaining issues include the glovebox in the basement of the 324 Building, which will be decontaminated and the decontamination residue will be characterized. That activity should be concluded within two weeks. The other Silver list issue is the HEPA filters

stored in the 325 Building, The HEPA filters are scheduled to be characterized, shipped out of 325 and disposed of by 12-31-96.

J. Wallace (Ecology) asked if the closed out issues met the commitments DOE-RL and PNNL made to Ecology. D. Crossley (PNNL) stated that the number 26 represented 25 items identified by Ecology/DOE/PNNL as achievable in FY96 and 1 item considered achievable in FY97. It is PNNLs understanding that decontamination and waste disposition of the 324 Na Glove Box has not occurred and will not be concluded by PNNL due to funding constraints. This Silver List Item is proposed for transfer to PHMC. The work required for this effort will take roughly 2 weeks to complete for close-out but will be at the direction of PHMC.

#### 5. Efficiency Issues

J. Wallace (Ecology) suggested scheduling the workshops in conjunction with the PMMs as a cost- and time-saving effort.

#### 6. Schedule Variance and Funding

J. Fulton (PNNL) reported that all of the Part A permit application closure activities for FY '96 have been completed, and some of the work scheduled for FY '97 was completed in FY '96. The Part A permit application activity for FY '97 will not require substantial effort for completion. There was a cost overrun of \$2,000.

The Part B permitting tasks encountered schedule delays relative to the workshop activities. The project schedule was modified through formal baseline revision, and the third workshop was rescheduled in FY '97. As a result of the rebaselining, the remaining activities were completed on schedule, in accordance with the new schedule.

The cost performance was underrun by \$62,000; however, PNNL is anticipating \$65,000 will be required to complete that Part B permit application activity, which is included in the shortfalls for FY '97.

#### 7. Status of Action Items

08-01-96:1, Ecology will provide final comments on the 325 HWTU Part B permit application by the next workshop on August 6, 1996.

The workshop was canceled. G. Davis (Ecology) provided final comments; however, PNNL is waiting for final comments regarding the WAP. This action item was left open pending receipt of comments on the WAP.

08-01-96:2, Resolve actions from the past 325 Part B workshops by the next workshop on August 6, 1996.

The workshop was canceled. G. Davis reported that there are two comments that have not been resolved. This action item was left open.

09-05-96:1, Review the Part B Permit Application workshop schedule to determine the amount of work scope that can be completed in FY '96.

This action item was considered closed because FY96 had already expired.

8. General Discussion

G. Davis (Ecology) inquired about an occurrence report regarding a differential pressure alarm that inadvertently disabled the 325 Building. M. Reiss (PNNL) took an action to follow-up and provide information to G. Davis.

9. New Action Items

10-09-96:1 Follow-up and provide information to Ecology regarding a differential pressure alarm that inadvertently disabled the 325 Building.  
ACTION: M. Reiss (PNNL)

10. Next Project Managers Meeting

- The next PMM was scheduled for November 4, 1996, in Richland, Washington.
- Proposed topics may be submitted to M. W. McCoy.



## Distribution:

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RCRA Files/JM	WHC	H6-23

ADMINISTRATIVE RECORD (Two Copies): 325 Hazardous Waste Treatment Unit, T-3-4 [Care of EDMC, WHC (H6-08)]

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Please send comments on distribution list to M. W. McCoy (P7-79), (509) 376-1483.