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Meeting Minutes Transmittal

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 Building, Mt. St. Helens Room  
Richland, Washington

June 7, 1994  
1:00 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.

Clifford E. Clark Date: 7/14/94  
Clifford E. Clark, Unit Manager, RL

Not Present Date: \_\_\_\_\_  
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Jeanne J. Wallace Date: 7/14/94  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

Kathleen A. Poston Date: 7/14/94  
Kathleen A. Poston, 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



94-07276-148

Attachment i

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 Building, Mt. St. Helenes Room  
Richland, Washington

June 7, 1994  
1:00 p.m. to 3:00 p.m.

Agenda

1. Approval of Past Unit Managers Meeting Minutes (Ecology/RL/PNL)
2. 325 HWTU Start-up Schedule (RL/PNL)
3. Status of RL/PNL 325 Consolidation Proposal (Ecology/RL/PNL)
  - TPA Change Package for PNL Units
  - Ecology's May 18, 1994 Response Letter
  - Combined 325 HWTUs Form 3
  - NOI to add Tank Storage to 325 HWTU Form 3
  - Combined 325 HWTUs Part B Application
4. General Discussion (Ecology/RL/PNL)
5. New Action Items (Ecology/RL/PNL)
6. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Proposed July 12 or 14, 1994 date
  - Proposed topics

9413278.1159

Attachment 2

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 building, Mt. St. Helens Room  
Richland, Washington

June 7, 1994  
1:00 p.m. to 3:00 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Unit Managers Meeting Minutes

The May 31, 1994 Unit Manager Meeting minutes were approved and signed.

2. 325 HWTU Start-up Schedule

Ms. K. Poston (PNL) reported that there were no updates regarding the status of the start-up schedule.

3. Status of RL/PNL 325 Consolidation Proposal

• TPA Change Package for PNL Units

Mr. H. Tilden (PNL) stated that the draft TPA change package proposing to withdraw the physical/chemical, the thermal and biological Part A permit applications are in concurrence at PNL. A draft copy of the change package was distributed during the meeting.

Ms. J. Wallace (Ecology) stated that withdrawal of the physical/chemical and the biological treatment Part A permit applications should not pose a problem. However, Ms. Wallace expressed reservations regarding withdrawal of the thermal treatment Part A, since activities already have occurred at the unit. Ms. Wallace stated that justification must be provided for withdrawal of the thermal Part A permit application. Mr. C. Clark (RL) noted that the activity that has occurred under the thermal Part A involved simulants, and that treatment of real waste has not occurred. Mr. Clark added that the concept of withdrawal is not accurate, since the Part A is being modified and RL/PNL will not be withdrawing anything. Ms. Poston pointed out that there is a December 1994 milestone associated with the thermal Part B permit application.

Ms. Wallace suggested separating the request for withdrawing the thermal treatment Part A from the physical/chemical and biological treatment Part A's to avoid delaying approval of the change request for the physical/chemical and biological Part A's. It was agreed that PNL would provide documentation of the permitted activities that were conducted under the thermal Part A and attach

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it to the TPA milestone change package. Ms. Wallace requested that a draft be sent for her review.

- **Ecology's May 18, 1994 Response Letter**

Referring to Ecology's May 18, 1994 letter, Mr. Day requested clarification regarding Ms. Wallace's reference to procedural closure under bullet No. 1. Ms. Wallace stated that procedural closure referred to in the RCRA section of the TPA allows units that have never conducted waste management activities to be withdrawn.

Mr. Day referred to bullet No. 2, which states that milestone M-20-43 would be deleted. Mr. Day stated that the change request proposes to modify and not delete the milestone. Ms. Wallace explained her understanding was that the milestone has been met to merge the shielded analytical laboratory into the existing 325 HWTU Part A and modify the Part A, and that the milestone associated with the physical/chemical Part A would be deleted. Mr. Clark and Ms. Poston concurred that was the agreement.

- **Combined 325 HWTU's Form 3**

Ms. Poston stated that PNL has been receiving daily requests from their contractor for information, and a draft copy of the combined Form 3 should be available for review soon.

- **NOI to Add Tank Storage to 325 HWTU Form 3**

Ms. Poston reported that development of the notice of intent is progressing slowly.

- **Combined 325 HWTU's Part B Application**

Ms. Poston stated that PNL's contractor is compiling information, and PNL is planning to have a draft available for review in September 1994, assuming the December 1994 milestone will have to be met. Ms. Poston noted that PNL has requested the contractor to provide groups of chapters for review as they become available. Ms. Poston offered to provide Ms. Wallace the chapters for review at the same time. Ms. Wallace expressed an interest in receiving the chapters for review, and requested a month's notice before the chapters are transmitted.

#### 4. **General Discussion**

Ms. Wallace noted that Ecology's inspection report has not been issued.

#### 5. **New Action Items**

There was one action item to provide Ms. Wallace the full justification of the TPA change request package by August 15, 1994.

91-3278-146

6. **Next Unit Managers Meeting**

- **Proposed July 12 or 14, 1994 Date**

The next Unit Managers Meeting was scheduled for June 12, 1994.

- **Proposed Topics**

Proposed topics for the next Unit Managers Meeting include: discussion regarding the TPA change request and the justification to be provided for the change request; the 325 HWTU start-up schedule; and a status on the consolidated Form 3, NOI and Part B permit application.

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Attachment 4

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
337 Building, Mt. St. Helens Room  
Richland, Washington

June 7, 1994  
1:00 p.m. to 3:00 p.m.

Action Items

Action Item #

Description

6-7-94:1

PNL will provide Ecology (Ms. Wallace) a full justification regarding the TPA change request package by August 15, 1994.

9413278-469

Distribution:

E. M. Bowers	RL	K8-50
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
D. L. Duncan	EPA Region 10	HW-106
G. D. Hendricks	GSSC	B1-42
K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
P. J. Turner	PNL	P7-34
J. J. Wallace	Ecology	N1-05

ADMINISTRATIVE RECORD: 325/3100 Hazardous Waste Treatment Unit, T-3-4  
[Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to K. E. Knox (H6-24),  
(509) 372-3596.

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