

**START**

**Meeting Minutes Transmittal**

**WASTE RECEIVING AND PROCESSING  
NOD WORKSHOP KICK-OFF MEETING  
2400 Stevens Center, Room 2200  
Richland, Washington**

**February 6, 1996  
7:30 a.m. to 9:30 a.m.**

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Notice of Deficiency (NOD) Workshop Meeting.

*Anthony C. McKarns* Date: 3/28/96  
Anthony C. McKarns, Unit Manager, RL

*Fenggang Ma* Date: 3-28-96  
Fenggang Ma, Unit Manager, Washington State Department of Ecology

Waste Receiving and Processing Modules 1, 2A and 2B, WHC Concurrence

Not Present *B. Mayancsik* Date: 3-28-96  
Bernadette A. Mayancsik, Contractor Representative, WHC

PURPOSE: Discuss WRAP Part B Application and NOD Workshop Format.

- Meeting Minutes are attached. Minutes are comprised of the following:
- Attachment 1 - Agenda
  - Attachment 2 - Summary of Meeting Discussion and Commitments/Agreements
  - Attachment 3 - Attendance List
  - Attachment 4 - WRAP RCRA Permitting Chronology as of 2/6/96
  - Attachment 5 - Permit Modification Schedule
  - Attachment 6 - Hanford Facility Permit Waste Receiving and Processing (WRAP) Draft Part B Proposed Workshop Schedule



**Attachment 1****WASTE RECEIVING AND PROCESSING  
NOD WORKSHOP KICK-OFF MEETING  
2400 Stevens Center, Room 2200  
Richland, Washington**

**February 6, 1996  
7:30 a.m. to 9:30 a.m.**

**AGENDA****WASTE RECEIVING AND PROCESSING**

1. Introductions (RL/WHC)
2. Background on WRAP Part B application
  - WRAP RCRA Permitting Chronology
  - Hanford Facility Permit and General Information Volume
  - Hanford Permit Modification Schedule
  - New Ecology Checklist - Part B Streamlining
  - NOD workshops and proposed schedule
3. NOD Workshop Format Discussion (Ecology/RL/WHC)
  - NOD Response Table Approach
  - NOD Workshop Approach
4. Review of Key Topics (Ecology/RL/WHC)
  - Site-wide related - Critical Systems
  - Building Emergency Plan
  - Ecology authority over radionuclides
  - Permitting consistency between TSD units
  - Waste analysis plan
  - Part A
5. Action items (Ecology/RL/WHC)
  - New action items
6. Set next meeting date (Ecology/RL/WHC)
  - Tentative dates
  - Proposed topics

**Attachment 2****WASTE RECEIVING AND PROCESSING  
NOD WORKSHOP KICK-OFF MEETING  
2440 Stevens Center, Room 2200  
Richland, Washington**

**February 6, 1996  
7:30 a.m. to 9:30 a.m.**

**Summary of Discussion and Commitments/Agreements****1. Introductions (RL/WHC)**

Introductions were made around the table.

**2. Background on CWC Part B application**

Ms. G. Cummins (WHC) presented the background on Waste Receiving and Processing (WRAP) RCRA permitting. She handed out a WRAP RCRA Permitting Chronology (Attachment 4) and discussed the RCRA Part A and Part B history. She also discussed the relationships between the Hanford Facility (HF) RCRA Permit, the General Information portion of DOE/RL 91-28, HF RCRA application, and the unit-specific WRAP application.

Ms. Cummins handed out copies of the Permit Modification Schedule (Attachment 5), illustrating that the WRAP unit-specific portion is planned for incorporation into the HF RCRA permit in Modification D in 1998.

Ms. Cummins stated that the WRAP Working Draft-1 provided for the workshop included incorporation of NOD comments and updates but was assembled according to the 1994 DOE RCRA checklist. In February 1995, Ecology issued a new checklist. Ms. Cummins stated that changes would be made to the Working Draft as needed to meet the new checklist. Mr. F. Ma (Ecology) questioned whether it would be necessary to change the draft. Ms. Cummins stated that the Part B for the units in Modifications A and B had already been changed and that several of the program managers and Moses Jaraysi had requested we use the new checklist. Ms. Cummins stated that the new checklist does not change much but does help in streamlining the Part B. The most noticeable changes are seen in the removal of sections that are covered in DOE/RL 91-28 and the moving of the manifest description to the Waste Analysis Plan.

Ms. Cummins handed out the NOD workshop schedule (Attachment 6). She indicated that Chapter 1 (Part A) would be covered in today's meeting, and that Chapters 2 and 4 were scheduled for March.

### 3. NOD Workshop Format Discussion (Ecology/RL/WHC)

Ms. Cummins described two approaches to workshops. The first is the NOD comment with formal response and correspondence approach, and the second, a post NOD comment workshop discussion resolution with minutes and drafts formalizing communications. She indicated some program managers at Ecology prefer formal correspondence. Mr. Ma indicated that Mr. Jaraysi's workshop approach included the initial NOD cycle, but after that, a less formal comment/rewrite approach was what was preferred. Since WRAP 1 had already gone through, and completed an NOD cycle, he would like to receive any rewritten chapters before the workshop and provide the comments in the workshop. Comments will be resolved and a final draft chapter text agreed upon by attendees by the end of the workshops.

### 4. Review of Key Topics

Ms. Cummins suggested that critical systems and site-wide related issues be covered after resolution in the Hanford Facility Permit.

Mr. Ma stated Modifications 2A and 2B do not need to be included in this modification.

Mr. C. Lewis (WHC) stated the Building Emergency Plan (BEP) will be completed in September 1996.

Ms. Cummins stated Ecology authority over radionuclides is a sitewide issue. The information that pertains to radionuclides in the working draft is for information only. As the radionuclide issue comes up in the comments, it is addressed, but it is not a regulatory issue at this time.

Ms. Cummins stated that TSD units are working on permitting consistency between the Low-Level Burial Grounds, CWC, and WRAP in alignment with current Part Bs.

Ms. Cummins stated the WRAP waste analysis plan (WAP) is on schedule for April 1996.

Part A/Chapter 1 updates since the December 1994 Working Draft: A new foreword has been written. The table of contents remains the same and will be updated when the chapters are done. The glossary will be deleted. The introduction will be part of Chapter 1. The new Chapter 1 includes the Part A, signed by Mr. Wagoner January 1995. Mr. Ma suggested WRAP 2A and 2B may not be needed to be included in the Part A.

Ms. Cummins handed out copies of the Ecology Dangerous Waste Application Checklist. Comments for Chapter 1 were generated and are provided in Attachment 7.

5. **Action Items**

- New action items

6. **Set Next Meeting**

- Tentative dates

The next NOD Workshop was scheduled for March 14, 8:00 a.m. to 11:00 a.m.

- Proposed topics

Ms. Cummins will send out Chapters 2 and 4 this week to prepare for the meeting.



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**Attachment 4**

**WASTE RECEIVING AND PROCESSING  
NOD WORKSHOP KICK-OFF MEETING  
2440 Stevens Center, Room 2200  
Richland, Washington**

**February 6, 1996  
7:30 a.m. to 9:30 a.m.**

**WRAP RCRA PERMITTING CHRONOLOGY AS OF 2/6/96**

9615407.2602

## WRAP RCRA Permitting Chronology as of 2/6/96

1. Original Part A (Revision 0) submitted to Ecology and EPA May 19, 1988 included the Radioactive Mixed Waste Storage Facility (CWC) and Waste Receiving and Processing (WRAP).
2. Conceptual Design for Module 1 completed February 1989.
3. Part A (Revision 1) submitted to Ecology and EPA October 22, 1990 added waste codes D012 and D016 and 26 new dangerous waste codes based on EPA Final Rule Change "Hazardous Waste Management System; Identification and Listing of Hazardous Waste; Toxicity Characteristics Revisions" (55 FR 61).
4. Original Part B; Hanford Central Waste Complex - Waste Receiving and Processing Facility Dangerous Waste Permit Application (DOE/RL-91-16) was submitted to EPA and Ecology October 31, 1991. The permit mainly discussed Module 1 and deferred discussions of Modules 2A and 2B.
5. First Notice of Deficiency (NOD) sent by Ecology to DOE/RL June 4, 1992.
6. A NOD Response Table was submitted to Ecology September 21, 1992.
7. Ecology provided comments to NOD Response Table March 5, 1993.
8. Final NOD Response Table generated June 10, 1993.
9. WRAP Construction Package #1 (Module 1) provided to Ecology September 23, 1993.
10. A Notice of Intent (NOI) was submitted to Ecology August 31, 1994 to expand WRAP for greater than 90-day container storage and the ability to treat and store dangerous waste in tanks.
11. The Hanford Facility Part B Application was submitted and included the General Information Portion (DOE/RL 91-28). The Initial Hanford Facility RCRA Permit (HF RCRA Permit) became effective September 1994.
12. CWC-WRAP Part A Revision 2 was submitted to Ecology October 7, 1994 and added new waste codes and removed obsolete waste codes.
13. A WRAP Part B Working Draft-1 was submitted to Ecology December 30, 1994 and included text revisions from NOD Response Table and the HF RCRA Permit.
14. The Part A for CWC-WRAP was separated into two Part A's; CWC (Rev. 3) and WRAP (Rev. 0). The WRAP Part A Rev. 0 was submitted to Ecology January 25, 1995.
15. A new RCRA Checklist was issued by Ecology February 1995.
16. WRAP UMM Workshops to revise document to latest Checklist and incorporate recent changes initiated February 6, 1996.

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**Attachment 5**

**WASTE RECEIVING AND PROCESSING  
NOD WORKSHOP KICK-OFF MEETING  
2440 Stevens Center, Room 2200  
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**February 6, 1996  
7:30 a.m. to 9:30 a.m.**

**PERMIT MODIFICATION SCHEDULE**

PERMIT MODIFICATION SCHEDULE

## Attachment 2

Year and Mod.	TSD/Unit	*	Status and Remarks
1995 Mod. A	218-E-8 Borrow Pit Demolition Site	C	In Rev. 1, Completed, approved
	200 Area Ash Pit Demolition Site	C	In Rev. 1, Completed, approved
	216-B-3 Expansion Ponds	C	In Rev. 1, Completed, approved
	2101 M Pond	C	In Rev. 1, Completed, approved
	Simulated High Level Waste Slurry	C	In Rev. 1, Completed, approved
1995 Mod. A'	Hanford Patrol Academy Demolition	C	Proposed for Rev. 2
	105-DR Sodium Fire Facility	C	Proposed for Rev. 2
	304 Concretion Facility	C	Proposed for Rev. 2
1996 Mod. B MAY	PUREX Tunnels 1 & 2	B	
	300 Area Process Trenches	C	
	3718-F Alkali Metal Treatment	C	
	4843 Alkali Metal Storage	C	
1997 Mod. C	303-K Storage Facility	C	
	300 Waste Acid Treatment & Storage	C	
	325 Waste Treatment Facility	B	
	200 Area Liquid Waste Complex	B	
	216-U-12 Crib	C	
	Low Level Burial Grounds	B	
1998 Mod. D	100 D Ponds	C	
	1325-N Liquid Waste Disposal	C	
	1301-N Liquid Waste Disposal	C	
	1324-N Surface Impoundment	C	
	1324-NA Percolation Pond	C	
	Hanford Central Waste Complex	B	
	Waste Receiving & Processing (1)	B	

9613407.2605

**Attachment 6**

**WASTE RECEIVING AND PROCESSING  
NOD WORKSHOP KICK-OFF MEETING  
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**February 6, 1996  
7:30 a.m. to 9:30 a.m.**

**HANFORD FACILITY PERMIT WASTE RECEIVING AND PROCESSING (WRAP)  
DRAFT PART B PROPOSED WORKSHOP SCHEDULE**

# Hanford Facility Permit

## Waste Receiving and Processing (WRAP)

### Draft Part B Proposed Workshop Schedule

#	Name	Start	Finish	1995												1996												1997											
				D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N
5	DOE-RL Submit Part B Working Draft to Ecology	12/30/94	12/30/94	◆																																			
	Construction and Pre-Operational Review	3/31/95	3/31/96	■ 367d																																			
	Incorporate Remaining NODs and Chapter Revisions	1/27/96	8/23/96	■ 210d																																			
	Remaining Issues and Chapter 1	1/27/96	2/25/96	▨ 30d																																			
	Chapter 2 and 4	2/26/96	3/26/96	▨ 30d																																			
	Chapter 3	3/27/96	4/25/96	▨ 30d																																			
	Chapter 6 and 8	4/26/96	5/25/96	▨ 30d																																			
	Chapter 7, 10, 12	5/26/96	6/24/96	▨ 30d																																			
	Chapter 11, 13, 14, 15	6/25/96	7/24/96	▨ 30d																																			
	Tech. Edit & Format, Incorporate Comments	7/25/96	8/23/96	▨ 30d																																			
	Operational Readiness and Hot Startup	8/24/96	7/17/97	■ 328d																																			
	Post Construction and Operational Modifications	8/24/96	5/30/97	▨ 280d																																			
	Workshop to discuss Modifications (as required)	5/31/97	6/20/97	▨ 21d																																			
	Document Editing	6/21/97	7/17/97	▨ 27d																																			
	WHC/RL Concurrent Review	7/18/97	8/17/97	■ 31d																																			
	WHC/RL Review Period	7/18/97	7/27/97	□ 10d																																			
	Resolve and Incorporate Comments	7/28/97	8/6/97	□ 10d																																			
	Final Editing/Document Assembly	8/7/97	8/17/97	□ 11d																																			
	Certification	8/18/97	9/30/97	■ 44d																																			
	WHC Certification	8/18/97	8/31/97	▨ 14d																																			
	RL Certification	9/1/97	9/30/97	▨ 30d																																			
.6	Transmit Certified Part B to Ecology	10/1/97	10/1/97	◆																																			

007-20999

Project: WRAP-B3.MPW  
 Date: 11/16/95  
 Permitting Lead: G. D. Cummins

Subactivities   
 Activities   
 Completed   
 Milestone

## Attachment 7

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February 6, 1996  
7:30 a.m. to 9:30 a.m.

## NEW COMMENTS OF WRAP PART B PERMIT CHAPTER 1

1. It may be a good idea to delete all the WRAP 2A and 2B related descriptions, because it is very unlikely 2A and 2B will be built anymore. The to be assigned new M-19 milestone is a sure sign for that.
2. Any changes may be caused by the new revision of the WAC 173-303. For example, WCO2 does not exist anymore, and WOO1 related stuffs were modified a lot.
3. It shall be clearly written that the treatment at WRAP 1 will not satisfy LDR requirements.
4. Update WRAP photo in Part A pg. 29.
5. Pg. 24 eliminate 2A & 2B.
6. Pg. 28 north arrow.
7. Pg. 4 delete WRAP 2A, 2B.

## Distribution:

L. D. Arnold	WHC	B2-35*
R. E. Bley	RL	A5-18
R. J. Bottenus	WHC	T3-01*
R. C. Bowman	WHC	H6-24*
T. A. Carlson	WHC	T3-28*
R. M. Carosino	RL	A4-52
M. Ciminera	GSSC	B1-42*
C. E. Clark	RL	A5-15*
G. D. Cummins	WHC	H6-24
R. J. Giroir	WHC	T4-05*
R. F. Guercia	RL	S7-55*
P. L. Hapke	WHC	T4-05*
K. L. Hladek	WHC	T4-02*
M. N. Jaraysi	Ecology	B5-18*
D. R. Lucas	WHC	G3-15*
F. Ma	Ecology	B5-18
P. J. Macbeth	GSSC	R3-82*
P. J. Mackey	WHC	B3-15
B. A. Mayancsik	WHC	T3-01
T. C. McKarns	RL	A5-52
M. A. McLaughlin	WHC	B2-35*
R. D. Pierce	WHC	T3-04
S. M. Price	WHC	H6-23*
J. G. Riddelle	WHC	T3-01*
A. R. Sherwood	WHC	H6-20
J. G. Starkey	WHC	G3-15
H. T. Tilden II	PNL	P7-79
J. L. Westcott	WHC	T3-04
J. K. Yerxa	RL	A7-75
RCRA Files	WHC	H6-23

\*electronic copy

ADMINISTRATIVE RECORD: Waste Receiving and Processing TS-2-4 [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

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-070 (Records Center)

Please send comments on distribution list to G. D. Cummins, WHC (H6-24) (509) 372-2484