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**Meeting Minutes Transmittal**

**325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
325 Conference Room  
Richland, Washington**

**December 9, 1993  
1:00 p.m. to 2:00 p.m.**

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

Not Present \_\_\_\_\_ Date: \_\_\_\_\_  
Clifford E. Clark, Unit Manager, RL

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

*Jeanne J. Wallace* \_\_\_\_\_ Date: 1/27/94  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

*Kathleen A. Poston* \_\_\_\_\_ Date: 1/26/94  
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



**Attachment 1****325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
325 Conference Room  
Richland, Washington****December 9, 1993  
1:00 p.m. to 2:00 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 proposals (Ecology/RL/PNL)
  - Separation of 325 and 3100 into separate units
  - Consolidation of 325 HWTU and 325 SAL under 325 HWTU Permit
  - Actions needed to implement proposals (TPA Change Packages, Revised Documents)
4. 325/3100 Permit Application Review Status (Ecology)
  - Informal comments
5. General Discussion. (Ecology/RL/PNL)
6. Status Action Items (Ecology/RL/PNL)
  - Previous Action Items
    - PNL will provide Ecology (J.J. Wallace) a copy of the 325 Hazardous Waste Treatment Unit and 325 Shielded Analytical Laboratory floor plans by November 15, 1993. (10-28-93:1)
  - New Action Items
7. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Tentative dates
  - Proposed topics
8. Tour of 325 HWTU and 325 SAL (Ecology/RL/PNL)

## Attachment 2

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
325 Conference Room  
Richland, Washington

December 9, 1993  
1:00 p.m. to 2:00 p.m.

## Summary of Discussion and Commitments/Agreements

## 1. Approval of Past Unit Managers Meeting Minutes

- The October 28, 1993, Unit Manager Meeting minutes were approved and signed.

## 2. 325 HWTU Start-up Schedule

- Ms. K. Poston (PNL) reported there was no update on the start-up schedule for 325 HWTU, and that the operational readiness review (ORR) is ongoing. Ms. Poston stated that the PNL board chair has asserted his right to not be held to a start-up schedule. Ms. Poston added that PNL does not anticipate the ORR taking an extended amount of time, but could not provide a start-up date. Ms. J. Wallace (Ecology) indicated that was acceptable.

## 3. Status of RL/PNL proposals

- Separation of 325 and 3100 into Separate Units

Ms. Wallace reported that she had discussed within Ecology RL/PNL's proposal of splitting 325 and 3100 into separate units. Ecology does not have a procedure for separating units, and as a result a committee is being formed to develop a review process for splitting a unit. Ms. Wallace stated that she will be on the committee. Ms. Wallace suggested that RL/PNL draft a letter to Ecology outlining the proposal to split the two units.

- Consolidation of 325 HWTU and 325 SAL under 325 HWTU Permit

Mr. B. Day (PNL) initiated a discussion regarding consolidation of 325 HWTU and 325 Shielded Analytical Laboratory (SAL). Ms. Wallace indicated that consolidation of the two units was a reasonable proposal, and she requested additional information regarding the function of the laboratory. A discussion followed regarding the approach for splitting 325 and 3100 and then consolidating 325 HWTU and 325 SAL. Ms. Wallace suggested a phased approach. Ms. Poston noted the physical/chemical milestone deadline date of December 1994, stressing the urgency of making a decision and the significant impact on resources if a change in plans occurred later in 1994. The parties agreed that PNL would send a letter to Ecology addressing the separation of 325 and 3100

and consolidation of 325 HWTU and 325 SAL as two separate actions, and attach a scope of work for each unit to the letter.

- **Actions Needed to Implement Proposals**

Mr. Day recommended identifying actions needed to implement the above-discussed proposals, such as Tri-Party Agreement (TPA) change packages and revised permit applications. A discussion followed regarding revision of the Part B permit application if 325 and 3100 are separated. RL/PNL and Ecology tentatively agreed on moving the 325 HWTU out of the existing permit and merging it into the physical/chemical permit through a change request. The 3100 portion would maintain interim status since the 325/3100 Part B permit has been submitted. These actions would be contingent upon Ecology approval of splitting 325 and 3100, and combining 325 HWTU and 325 SAL.

#### 4. 325/3100 Permit Application Review Status

- At the previous 325/3100 Unit Managers Meeting that was held October 28, 1993, RL/PNL and Ecology agreed that Ecology would informally provide any notice of deficiency (NOD) comments regarding review of the permit application. Ms. Wallace stated she had reviewed the first two chapters of the permit, and she provided two comments. Ms. Wallace commented that the siting criteria was not met for the 3100 portion of the permit. However, Ms. Wallace noted that comment would not apply if 3100 is pulled out of the permit.

Ms. Wallace's second comment pertained to restricting access in the corridors of the waste treatment unit during movement of waste. Ms. Wallace expressed concern for personnel working in a treatment, storage and disposal (TSD) unit without appropriate training, and the potential for exposure. Ms. Poston pointed out that PNL has strived to ensure all personnel are aware of what the possibilities are for exposures and spills. Ms. Poston suggested that PNL submit to Ecology a proposal outlining the protection of personnel, which would include training and controls on waste movement. Ms. Wallace indicated that would be acceptable and also noted that a compliance inspection will be performed before Ecology would issue a permit.

#### 5. General Discussion

- Ms. J. Bartz (MACTEC) provided an explanation of the revised review process for Part B permit applications that has been proposed by Ecology, noting that the review process is being implemented at some of the operable units. As permit chapters are completed and reviewed internally (including RL), they are transmitted to the regulatory unit managers for review and comment. Working meetings are then scheduled to address the NODs, which eliminates several NOD cycles. Mr. Day indicated this review process would be acceptable.

- Ms. Wallace suggested scheduling the Unit Manager Meetings at six-week intervals, and Mr. Day stated that would be acceptable.

#### 6. Status Action Items

- Action item 10-28-93:1, which was to provide Ecology a copy of the 325 HWTU and 325 SAL floor plans by November 15, 1993, was closed. RL/PNL has drafted a letter to Ecology documenting the transmittal of the floor plans to Ecology.
- There was one new action item for RL/PNL to draft a letter to Ecology proposing separation of 325 and 3100 and consolidation of 325 HWTU and 325 SAL under the 325 HWTU permit, and attach the scope of work for the two units to the letter. A draft copy of the letter will be sent to Ms. Wallace for her review before the final letter is transmitted to Ecology.

#### 7. Next Unit Managers Meeting

- The next Unit Managers Meeting was scheduled for the week of January 24, 1994.
- PNL will provide a status of the schedule for the start-up of HWTU at the next Unit Managers Meeting.

#### 8. Tour of 325 HWTU and 325 SAL

Following the December 9, 1993 Unit Managers Meeting, a tour of the 325 HWTU and 325 SAL was conducted, and Ms. Wallace was present.



Attachment 4

325/3100 HAZARDOUS WASTE TREATMENT UNIT  
Unit Managers Meeting  
325 Conference Room  
Richland, Washington

December 9, 1993  
1:00 p.m. to 2:00 p.m.

Action Items

Action Item #

Description

10-28-93:1

PNL will provide Ecology (J. Wallace) a copy of the 325 unit floor plans by November 15, 1993.

CLOSED

12-09-93:1

RL/PNL will draft a letter to Ecology proposing the separation of 325 and 3100, and consolidation of 325 HWTU and 325 SAL. The scope of work for the two units will be attached to the letter. A draft copy of the letter will be sent to Ms. J. Wallace (Ecology) for review before the letter is formally transmitted to Ecology.

OPEN

## Distribution:

J. K. Bartz	MACTEC	B1-42
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	
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. Wallace	Ecology	B5-18

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

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