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Meeting Minutes Transmittal

PNNL NON-OPERATIONAL UNITS
Project Managers Meeting
337 Building, Mt. Rainier Room, 3rd Floor North
Richland, Washington

June 6, 1996
3:00 p.m. to 4:00 p.m.

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

M. A. Barnard Date: 7/11/96
M. A. Barnard, Project Manager, RL

Jeanne J. Wallace Date: 7/11/96
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

PNNL Non-Operational Units, PNNL Concurrence

David B. Crossley Date: 7/11/96
David B. Crossley, Contractor Representative, PNNL

Purpose: Discuss Closure 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 5 - Biological Treatment Test Facility Briefing Sheet
- Attachment 6 - Path Forward Document for the 324 Pilot Scale Plant



ATTACHMENT 1

PNNL NON-OPERATIONAL UNITS
 Project Managers Meeting
 337 Building, Mt. Rainier Room, 3rd Floor North
 Richland, Washington

June 6, 1996
 3:00 p.m. to 4:00 p.m.

Agenda

1. Approval of past meeting minutes (Ecology/DOE-RL/PNL)
2. Status of Procedural Closure Requests Review for the Thermal and Physical/Chemical Treatment Test Facilities, Form 3 (PNNL/DOE-RL)
3. Status of PNL Internal Procedural Closure Package for Biological Treatment Test Facilities (Ecology)
4. Status on Action Items (Ecology/DOE-RL/PNL)
 - 01-11-96:1 Prepare DRAFT schedule for procedural closure of 324 Pilot Scale Plant and 332 Storage Facility and give to J. Wallace, Ecology, by January 31, 1996.
 ACTION: M. Barnard (DOE-RL)/J. Wallace (Ecology)/H. Tilden and Dave Crossley (PNNL)
 OPEN
 - 01-11-96:2 Review October 25, 1995, Ecology inspection report on the Biological Test Unit by June 6, 1996.
 ACTION: R. Effland (Ecology)
 OPEN
 - 05-02-96:1 Ecology will transmit a letter to DOE-RL and PNNL by June 6, verifying procedural closure of the Physical, Chemical and Thermal units.
 ACTION: J. Wallace (Ecology)
 CLOSED
 - 05-02-96:2 PNNL will schedule a Biological Treatment Test Facility briefing with R. Effland (Ecology) by May 17, 1996.
 ACTION: H. Tilden (PNNL)
 CLOSED: Briefing held June 5 1996.
 - 05-02-96:3 Prepare a path forward document for the 324 Pilot Scale Plant by June 6, 1996.
 ACTION: H. Tilden (PNNL)
 CLOSED: Completed 5/15/96
5. General Discussion (Ecology/DOE-RL/PNL)
6. New Action Items
7. Next Project Managers Meeting (Ecology/RL/PNL)
 - Next Meeting
 July 11, 1996
 337 Building, Mt. Rainier Room, 3rd Floor North
 Richland, Washington
 - Proposed topics

Attachment 2**PNNL NON-OPERATIONAL UNITS
Project Managers Meeting
337 Building, Mt. Rainier Room
Richland, Washington****June 6, 1996
3:00 p.m. to 4:00 p.m.****Summary of Discussion and Commitments/Agreements**

1. Approval of Past Project Managers Meeting Minutes
2. Status of Procedural Closure Requests Review for the Thermal and Physical/Chemical Treatment Test Facilities

H. Tilden (PNNL) reported that Ecology issued a letter May 13, 1996, approving the procedural closure of the Thermal and Physical/Chemical Treatment Test Facilities. The only remaining activity for the units is to submit a revised Form 3 stamped "Closed, 5-13-96" across the front. PNNL is preparing the documents.

3. Status of PNNL Internal Procedural Closure Package for Biological Treatment Test Facilities

J. Wallace (Ecology) introduced Ron Effland (Ecology) as the new unit manager for the Biological Treatment Test Facility. R. Effland (Ecology) is reviewing the file and will provide a response regarding procedural closure by June 28, 1996.

4. Status on Action Items

01-11-96:1 Prepare DRAFT schedule for procedural closure of 324 Pilot Scale Plant and 332 Storage Facility and give to J. Wallace (Ecology) by January 31, 1996.

ACTION: M. Barnard (DOE-RL)/J. Wallace (Ecology)/H. Tilden and D. Crossley (PNNL)

OPEN: H. Tilden (PNNL) stated that no funding is available; however, PNNL has agreed to prepare a path forward. H. Tilden (PNNL) added that PNNL put in a change request two months ago to reallocate funding for procedural closure of the two units. PNNL took an action to provide a status at the next PMM regarding the funding request.

01-11-96:2 Review October 25, 1995 Ecology inspection report on the Biological Test Unit.

ACTION: R. Effland (Ecology)

OPEN: R. Effland (Ecology) will provide a response by June 28, 1996.

05-02-96:1 Ecology will transmit a letter to DOE-RL and PNNL by June 6, 1996, verifying procedural closure of the Physical, Chemical and Thermal units.

ACTION: J. Wallace (Ecology)

CLOSED: The letter was issued May 13, 1996.

05-02-96:2 PNNL will schedule a Biological Treatment Test Facility briefing with R. Effland (Ecology) by May 17, 1996.

ACTION: H. Tilden (PNNL)

CLOSED: The briefing was held on June 5, 1996. A copy of the briefing sheet is attached (Attachment 5).

05-02-96:3 Prepare a path forward document for the 324 Pilot Scale Plan by June 6, 1996.

ACTION: H. Tilden (PNNL)

CLOSED: Document is included with the meeting minutes (Attachment 6).

5. General Discussion

J. Wallace (Ecology) inquired about PNNL's intent following procedural closure of the Biological Treatment Test Facility. M. Barnard (DOE-RL) responded that available funding is a consideration. H. Tilden (PNNL) added that the 332 Storage Facility received approval from Ecology for procedural closure in 1989. J. Wallace (Ecology) indicated that the next step would be to inspect the facility to verify that the condition has not changed.

6. New Action Items

06-06-96:1 Review the funding status for the 332 Storage Facility and provide an update at the next PMM on 7-11-96.

ACTION: M. Barnard (DOE-RL)

06-06-96:2 Review documentation regarding Ecology's 1989 approval for procedural closure of the 332 Storage Facility by the next PMM on 7-11-96.

ACTION: J. Wallace (Ecology)

7. Next Project Managers Meeting

- July 11, 1996
337 Building, Mt. Rainier Room, 3rd Floor North
Richland, Washington
- Proposed Topics
Proposed topics may be submitted to D. Lutter (PNNL).

**PNNL NON-OPERATIONAL UNITS
PROJECT MANAGERS MEETING
Building 337, Mt. Rainier Room
Richland, Washington**

**June 6, 1996
3:00pm to 4:00pm**

NAME	ORGANIZATION	PHONE NUMBER
<i>[Signature]</i>	PNWL	376-5631
Jeanne Wallace	Ecology	736-3019
Jeff Long	PNWL	7 376-8795
ELLEN MATTLIN	DOE-RL	376-2385
RON EFFLAND	WA. STATE DEPT OF ECOLOGY	736-3088
Annette Barnard	DOE	372 4931
Harold Tilden	PNWL	376-0499

Attachment 4

**PNNL NON-OPERATIONAL UNITS
Project Managers Meeting
337 Building, Mt. Rainier Room, 3rd Floor North
Richland, Washington**

**June 6, 1996
3:00 p.m. to 4:00 p.m.**

Action Items

<u>Action Item #</u>	<u>Description</u>
01-11-96:1	<p>Prepare DRAFT schedule for procedural closure of 324 Pilot Scale Plant and 332 Storage Facility and give to J. Wallace (Ecology) by January 31, 1996. ACTION: M. Barnard (DOE-RL)/J. Wallace (Ecology)/H. Tilden and D. Crossley (PNNL) OPEN: H. Tilden (PNNL) stated that no funding is available; however, PNNL has agreed to prepare a path forward. H. Tilden (PNNL) added that PNNL put in a change request two months ago to reallocate funding for procedural closure of the two units. PNNL took an action to provide a status at the next PMM regarding the funding request.</p>
01-11-96:2	<p>Review October 25, 1995 Ecology inspection report on the Biological Test Unit. ACTION: R. Effland (Ecology) OPEN: R. Effland (Ecology) will provide a response by June 28, 1996.</p>
05-02-96:1	<p>Ecology will transmit a letter to DOE-RL and PNNL by June 6, 1996, verifying procedural closure of the Physical, Chemical and Thermal units. ACTION: J. Wallace (Ecology) CLOSED: The letter was issued May 13, 1996.</p>
05-02-96:2	<p>PNNL will schedule a Biological Treatment Test Facility briefing with R. Effland (Ecology) by May 17, 1996. ACTION: H. Tilden (PNNL) CLOSED: The briefing was held on June 5, 1996. A copy of the briefing sheet is attached (Attachment 5).</p>
05-02-96:3	<p>Prepare a path forward document for the 324 Pilot Scale Plan by June 6, 1996. ACTION: H. Tilden (PNNL) CLOSED: Document is included with the meeting minutes (Attachment 6).</p>

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- 06-06-96:1 Review the funding status for the 332 Storage Facility and provide an update at the next PMM on 7-11-96.
ACTION: M. Barnard (DOE-RL)
- 06-06-96:2 Review documentation regarding Ecology's 1989 approval for procedural closure of the 332 Storage Facility by the next PMM on 7-11-96.
ACTION: J. Wallace (Ecology)

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Attachment 5

PNNL NON-OPERATIONAL UNITS
Project Managers Meeting
337 Building, Mt. Rainier Room, 3rd Floor North
Richland, Washington

June 6, 1996
3:00 p.m. to 4:00 p.m.

Biological Treatment Test Facility Briefing Sheet
Briefing held on June 5, 1996

BRIEFING FOR RON EFFLAND, ECOLOGY
BIOLOGICAL TREATMENT TEST FACILITIES

June 5, 1996

Facility Type: Biological Treatment

Facility History:

The Part A, Form 3 for this unit was filed on May 19, 1988 with over 60 other Form 3's for the Hanford Facility. The filing was intended to support biological treatment activities on "real" waste in lieu of, or in excess of, treatability test exclusion quantities. No such activities actually took place.

In 1993, a survey was conducted (with Ecology and EPA participation) which inquired about Hanford research personnel intent to utilize the Biological Treatment Test Facilities for treatment of dangerous waste. No foreseeable future activities for the unit were identified. The conclusion reached by RL/PNNL was that the unit should be procedurally closed.

Facility Status:

The building(s) named in the permit are active. Some are actively managing waste (90-day accumulation areas, satellite areas, 324 REC and HLV) but no biological treatment activities utilizing hazardous waste are or were performed.

Closure Status:

- Under M-20-44, the Part B permit application portion for this unit was due 12/31/95. It was agreed by the Project Managers that submittal of procedural closure documentation would fulfill this milestone.
- No historical uses of the unit were identified, and no future uses were identified (see "permitting strategy" document, PNL-8877)
- Certified procedural closure documentation was submitted to Ecology in December 1995.
- Ecology inspected the unit in late 1995 to verify that no permitted activities were taking place
- RL and PNNL are requesting procedural closure of the unit and termination of interim status via the Tri-Party Agreement Action Plan, Section 6.3.3.

Path Forward:

- Ecology onsite inspection needs to be formalized to verify non-RCRA status
- Any comments on the certified package need to be forwarded to RL/PNNL for response
- Public comment needs to be solicited once all Ecology comments have been resolved
- Closure can be concluded after the public comment period (unless significant comments are received)

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Attachment 6

**PNNL NON-OPERATIONAL UNITS
Project Managers Meeting
337 Building, Mt. Rainier Room, 3rd Floor North
Richland, Washington**

**June 6, 1996
3:00 p.m. to 4:00 p.m.**

Path Forward Document for the 324 Pilot Scale Plan

Hanford Facility Permit
Status of Part A Permit Application Portions
Co-Operated by Pacific Northwest National Laboratory
And Proposed for Procedural Closure

332 Storage Facility

Facility Type: Container Storage

Facility Status: Building being used for non-RCRA purposes

Closure Status:

- Filed for procedural closure (M-20-45)
- Petition approved by Ecology in 8/17/89 letter

Path Forward:

- Per 8/17/89 letter, need to "deny interim status" with public hearings
- Request consideration of procedural closure under TPA Action Plan, ¶6.3.3 in lieu of public hearings
- Consider utilizing same public notice/comment period as is to be utilized for other procedural closures
- Ecology onsite inspection may be needed to verify non-RCRA status

324 Sodium Removal Pilot Plant

Facility Type: Treatment of Reactive Metals

Facility Status: Equipment used has been decontaminated and demolished, laboratory space being utilized for non-RCRA purposes

Closure Status:

- Filed for procedural closure (M-20-45)
- Ecology 8/17/89 letter requested more info (operating logs)
- Supplemental information was prepared by PNNL, don't know if it went to Ecology

Path Forward:

- (Re)Submit operating logs requested in 8/17/89 letter
- Pursue procedural closure under TPA Action Plan ¶6.3.3
- Ecology onsite inspection may be needed to verify non-RCRA status

Distribution:

M. A. Barnard	RL	L4-40
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNNL	P7-79
C. R. DeLannoy	RL	A5-15
G. D. Hendricks	GSSC	B1-42
G. H. Fess	PNNL	P7-79
D. K. Lutter	PNNL	P7-79
S. M. Price	WHC	H6-23
D. B. Crossley	PNNL	K6-25
H. T. Tilden II	PNNL	P7-79
J. J. Wallace	Ecology	B5-18
RCRA Files	WHC	H6-24

ADMINISTRATIVE RECORD (Two Copies): PNNL Non-Operational Units, T-X-1, T-X-2, and T-X-3 [Care of EPIC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
P.O. Box 47600, Olympia, Washington 98504-7600

Please send comments on distribution list to D. K. Lutter (P7-79), (509)
376-5631.