

Meeting Minutes – Approval
Issue Resolution Workshop
For
T Plant Complex Part B Permit Application – Working Draft 1

2355 Stevens, Conference Room 203
Richland, Washington
Meeting Held September 10, 2001
From 10:30 AM to 12:00 PM

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

Not Present Date: _____
Michael Collins, Project Manager Representative, RL/WMD

Greta P. Davis Date: 11/8/01
Greta Davis, Unit Manager/Permit Writer, Washington State Department of Ecology

T Plant Complex – Contractor Concurrence

Brett M. Barnes Date: 11/8/01
Brett Barnes, Environmental Compliance Officer, T Plant Complex, FH/WMP

Not Present Date: _____
Paul Crane, FH/Waste Management Project Office

Scott H. Luke Date: 11/6/01
Scott Luke, Permitting Representative, FH/E&R

Purpose: Determine content of T Plant Complex Part B Permit Application

The attached minutes are comprised of the following:

- Attachment 1 - Meeting Agenda
- Attachment 2 - Summary of Discussion (Commitments/Agreements)
- Attachment 3 - Attendance List
- Attachment 4 - Action Items

Attachment 1

**Issue Resolution Workshop
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Agenda

- 1. Workshop Process**
 - Approval of past workshop minutes

- 2. WD-1 Review Status/Activities**
 - Milestone M-91 status
 - Corrective Action
 - 221-T Tank System closure agreement letter
 - Status Ecology review of Chapter 7.0 (Building Emergency Plan)
 - Status Ecology NODs
 - New Ecology comments/issues

- 3. Workshop Action Items**
 - Discuss open Action Items

- 4. Schedule Next Workshop**

Attachment 2

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Summary of Discussion and Commitments/Agreements

1. Workshop Process

- **Approval of past workshop minutes**
Minutes for the May 31, 2001 meeting were approved by Ecology.

2. WD-1 Review Status/Activities.

- **M-91 status**
(Note: Because M-91 treatment capability will not be developed at T Plant until 2006, workshop discussions have no bearing on the T Plant Complex Part B Permit Application under discussion for submittal to Ecology in 2002 and are, therefore, for information only.)

FH (Ken Hladek, Strategic Planning) reported that as a result of the dispute resolution process, negotiations to reach formal agreements on the *M-91 Transuranic Waste Project Management Plan* were to be completed by October 31, 2001.

- **Corrective action**
FH (Scott Luke) stated that the corrective action requirements of Section II.Y.2.c of the HF RCRA Permit are in effect based on Agreement PCHB 00-050. Section II.Y.2.c, requires that at the time closure certification is presented to Ecology, satisfaction of corrective action requirements must be documented or if corrective action requirements are not satisfied at the time of closure certification, identify the unsatisfied corrective action requirements and the RPP or CPP process and schedule under which they will be satisfied. Part B Permit WD text will be provided to Ecology that reflects this requirement.
- **221-T Tank System closure agreement letter**
FH, RL, Ecology and EPA met on September 4, 2001 in Richland to discuss EPA comments on the 221-T Tank System closure agreement letter delivered to Ecology on June 29, 2001. The June letter summarized the discussions and commitments from a meeting held May 14, 2001 discussing RL's request for approval of the 221-T Tank System closure approach. At that meeting, EPA (Dave Bartus) agreed that Ecology is the lead regulatory agency for tank system closure and will support the process that best fits the T Plant RCRA permitting pathway.
- **Chapter 7.0, Building Emergency Plan (BEP)**
FH (Luke) indicated that the *Building Emergency Plan for the Treatment Facility*, dated February 1, 2001 approved by Ecology at the May 31, 2001 workshop will be added to T Plant Complex Part B, Appendix 7A to replace the current Appendix 7A, dated March 8, 2000.

- **Chapter 3.0, Waste Acceptance Plant (WAP)**

FH (Cindy Girres) indicated that preparation of a revised T Plant WAP has begun. The T Plant and LLBG WAPs will be developed in parallel with the goal being, as much as possible, to standardize waste acceptance processes across the Hanford Site. Ecology (Davis) indicated that Jerry Yokel and Jeanne Wallace of Ecology will be assisting her and Matt Mills (LLBG Ecology Unit Manager) in formulation and approval of the WAPs.

- **Status Ecology NODs**

Ecology (Davis) indicated that she was generating a partial NOD table from the 'informal comments' already discussed and resolved in the workshops pertaining to Chapters 2.0, 4.0, and 11.0. Any informal comments that initiated changes to WD-1 of the T Plant Part B would become a formal NOD. She hoped to have the partial NOD table ready by the next workshop.

- **New Ecology comments/issues**

None.

3. Workshop Action Items

- **Open Action Items (Attachment 4)**

- **Action Item #5:** Preparation of a T Plant WAP has begun.
- **Action Item #9:** Will be revised to reflect the commitment to provide Ecology with Corrective Action text.

4. Date of Next Workshop

- The next workshop was tentatively set for October 24, 2001 at Ecology.

Attachment 4

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Action Items List

<u>Action Item #</u>	<u>Responsible Party</u>	<u>Description</u>	<u>Date Closed</u>
1	Fluor Hanford (Brett Barnes)	Provide a draft of the T Plant Complex Part A, Form 3, for discussion at the July 26, 2000 workshop.	Closed February 1, 2001
2	Fluor Hanford (Barnes/Luke)	Inform Ecology of the height of 214-T berm.	Closed August 9, 2000
3	Fluor Hanford (Barnes/Luke)	Inform Ecology of the types of 'alternative' packaging referenced in the subject text and under what conditions such packaging would be used.	Closed September 27, 2000
4	Fluor Hanford (Barnes/Luke)	Identify to Ecology how an individual entering the plant can know the number and location of current operations logbooks.	Closed September 27, 2000
5	Fluor Hanford (Barnes/Luke)	Submit WD-1 Chapter 3.0, Waste Analysis Plan, to Ecology.	<i>Open</i>
6	Fluor Hanford (Brett Barnes)	Provide Ecology with information on T Plant Complex WIDS sites.	Closed September 27, 2000
7	Fluor Hanford (Joel Williams)	Identify to Ecology whether the K Basin sludge that will be stored in canisters at T Plant Complex would become reactive or ignitable if allowed to dry.	Closed February 1, 2000
8	Fluor Hanford (Barnes/Luke)	Initial WD-1 Chapter 11.0, Closure submittal to Ecology.	Closed February 1, 2001
9	Fluor Hanford (Luke)	Add text regarding 'corrective action' at T Plant to the Part B WD.	<i>Open</i>
10	Fluor Hanford (Luke)	Revise Figure 2-5 for 2706-TA berm removal per ECN-653678.	Closed May 31, 2001

*New = action item assigned at this meeting

Distribution:

B. M. Barnes	FH	T3-28
M. S. Collins	RL	H0-12
P. J. Crane	FH	T4-05
R. M. Engelmann	FH	N1-25
G. P. Davis	Ecology	B5-18
F. C. Jamison	Ecology	B5-18
S. N. Luke	FH	N1-25
E. M. Mattlin	RL	A5-15
A. C. McKarns	RL	A5-15
G. L. Sinton	RL	H0-12
T. A. Shrader	RL	H0-12

ADMINISTRATIVE RECORD: T Plant Complex [Care of EDMC, LMSI (H6-08)]

Please send comments on distribution list to Scott Luke (G1-30), (509) 372-1667.