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Meeting Minutes Transmittal

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

February 22, 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: 3/29/94  
Clifford E. Clark, Unit Manager, RL

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

Jeanne J. Wallace Date: 3/29/94  
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

Kathleen A. Poston Date: 3/29/94  
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

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Attachment 1

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

February 22, 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 (RL/PNL)
  - Status of Draft Proposal Letter (RL/PNL)
  - Ecology Feedback on Draft Proposal Letter (Ecology)
4. General Discussion (Ecology/RL/PNL)
5. New Action Items (Ecology/RL/PNL)
6. Next Unit Managers Meeting (Ecology/RL/PNL)
  - Proposed dates
  - Proposed topics

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Attachment 2

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

February 22, 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 January 26, 1994 Unit Manager Meeting minutes were approved and signed.

2. 325 HWTU Start-up Schedule

- Ms. K. Poston (PNL) reported that the operational readiness plan checklist has been approved by the board. PNL is currently collecting all the data to verify each item. The board chair is still reserving the right to not give a start-up date. Mr. H. Tilden (PNL) inquired about completion of the compliance notebook and its accompanying documentation. Ms. Poston responded that the compliance notebook is complete, with the exception of a few page changes relating to certain items that have been identified. Mr. C. Clark (RL) inquired about providing the compliance notebook to Ms. J. Wallace (Ecology). Ms. Poston suggested supplying a copy to Ms. Wallace after the revisions to the have been completed, and Ms. Wallace indicated that would be acceptable.

3. Status of RL/PNL 325 Consolidation Proposal

- Status of Draft Proposal Letter

Ms. Poston stated that the letter proposing removal of the 3100 portion of 325/3100 HWTU and consolidation of 325 HWTU and the SAL HWTU is being routed through PNL for signature.

- Ecology Feedback on Draft Proposal Letter

Ms. Wallace reported that she had reviewed the draft proposal letter and discussed it with her supervisor. Ms. Wallace stated that due to the present reorganization within Ecology, PNL's proposal has not been addressed. Mr. Tilden asked if it would be appropriate for PNL to arrange a management briefing to present to Ecology. Ms. Wallace responded that Ecology would probably determine the direction to take. Mr. Clark pointed out that the Tri-Party Agreement (TPA) project managers hold quarterly meetings, and a briefing is provided to the project managers regarding the status of the M-20 Milestones. Mr. Clark suggested

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that RL/PNL's concern for obtaining a decision from Ecology regarding PNL's proposal could be included in the briefing.

Ms. Wallace expressed her opinion that the 3100 portion of the 325 HWTU could be removed through the notice of deficiency (NOD) process with little difficulty. Mr. Clark noted that the Part A permit application would have to be changed, and Mr. Tilden suggested the Part A could be resubmitted in conjunction with the Part B permit application. Mr. Clark suggested that all Part A changes be made at one time, including initiation of the NOI process, and that it be done early so the NOI process would not be held up. Mr. Clark added that there have been instances where the length of time required for public input had been changed or even waived, for minor activities, to allow the activities to proceed in a timely manner. He added that the NOD discussions need to be documented.

#### 4. General Discussion

- Ms. Wallace referred to PNL's notice of intent (NOI) regarding application for expansion to add tank storage capacity to the 325 SAL. Ms. Wallace stated that as existing facilities at Hanford proceed through the NOI process, it has created some confusion within Ecology because typically the NOI process applies to new or expanding facilities. Mr. Clark stated that the existing facilities at Hanford have utilized the NOI process because it is the closest applicable procedure for adding capacity to a unit. Ms. Wallace suggested that RL/PNL provide Ecology the basis for following the NOI process in the past and why it's being recommended for certain facilities. Mr. Clark responded that a package could be provided to support a decision whether the NOI process is applicable and the procedure for following it. Ms. Wallace agreed to provide feedback from Ecology regarding the NOI waiver.
- Ms. Wallace initiated a discussion regarding NODs associated with the original 325/3100 Part A permit application, noting that she had not provided formal NODs. Mr. B. Day (PNL) suggested that Ms. Wallace respond to RL's draft letter to Ecology, which proposes deleting the 3100 portion of 325/3100 HWTU, consolidation of the 325 HWTU and SAL HWTU, and submitting an NOI for expansion to add tank storage capacity to the 325 SAL.

#### 5. Status Action Items

- There were no past action items to status.

#### 6. Next Unit Managers Meeting

- The next Unit Managers Meeting was scheduled for March 29, 1994.
- Proposed topics for discussion at the next Unit Managers Meeting include a progress report on the ORR and the NOI.

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Attachment 4

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February 22, 1994  
1:00 p.m. to 3:00 p.m.

Action Items

Action Item #

Description

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.

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Distribution:

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B. J. Day	PNL	P7-79
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K. A. Poston	PNL	P8-01
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H. T. Tilden II	PNL	P7-68
P. J. Turner	PNL	P7-34
J. 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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Please send comments on distribution list to K. E. Knox (H6-24),  
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