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Meeting Minutes Transmittal

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

October 28, 1993
9:00 a.m. to 10:30 a.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

Clifford E. Clark, Unit Manager, RL

Date: 2/7/94

Not Present

Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Date: _____

Jeanne Wallace

Jeanne Wallace, Unit Manager, Washington State Department of Ecology

Date: 1/27/94

325/3100 Hazardous Waste Treatment Unit, PNL Concurrence

Kathleen A. Poston

Kathleen A. Poston, Contractor Representative, PNL

Date: 2-1-94

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
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Richland, Washington

October 28, 1993
9:00 a.m. to 10:30 a.m.

Agenda

1. New PNL Contractor Representative for 325/3100 HWTU
- 2.. Unit Status
 - 325 HWTU Start-up (RL/PNL)
 - 3100 Facility Status (RL/PNL)
 - Permit Application Revision Possibilities (RL/PNL)
 - Removal of 3100 portion from application
 - Consolidation of 325 HWTU and 325 Shielded Analytical Laboratory units under one RCRA permit
 - TPA milestone change request
3. Permit Application Schedule
4. General Discussion
 - Schedule Ecology Tour of 325 HWTU (Ecology/RL/PNL)
5. Status Action Items
 - New Action Items
6. Set Next Meeting Date
 - Tentative dates
 - Proposed topics

Attachment 2

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

October 28, 1993
9:00 a.m. to 10:30 a.m.

Summary of Discussion and Commitments/Agreements

1. New PNL Contractor Representative for 325/3100 HWTU

- Mr. B. Day (PNL) stated that Ms. K. Poston (PNL) will be the new contractor representative for the 325/3100 Hazardous Waste Treatment Unit (HWTU).

2. Unit Status

- Ms. Poston stated that PNL is conducting the operational readiness review (ORR). PNL's goal is to complete the ORR by January 1, 1994, and start-up of the 325 HWTU would begin shortly after completion of the ORR. Ms. J. Wallace (Ecology) inquired about the ORR procedure and Ecology's potential role in participating in the ORR. Mr. C. Clark (RL) noted that Ecology has not directly participated in an ORR; however, if there is a particular element of the review process that is of interest, Ecology may participate as an observer. Mr. Clark also noted that in the past, ORR checklists and the reports generated from the completed checklists have been provided to the regulators. Ms. Poston will be the point of contact if Ecology has a request regarding the ORR.
- Mr. P. Turner (PNL) reported that PNL has distributed a memo which states that the 3100 section of the HWTU has been put on indefinite hold pending funding from DOE, and 325 has been transferred to Ms. Poston's group.
- A discussion followed regarding permit application revision possibilities (see agenda). Mr. Clark recommended putting the 3100 unit on hold rather than splitting 325/3100, and then PNL would revise the 325 portion of the permit. Ms. Wallace stated that the two units in the 325/3100 Part B permit application are not distinguished from each other, and that the permit will need to be revised. Ms. Wallace noted that the 3100 section has interim status under the Part A. It was agreed among the parties that PNL will draft a letter to RL outlining its intentions for 3100, and accompany it with a letter to Ecology.

Mr. H. Tilden (PNL) provided an explanation of the shielded analytical laboratory (SAL) treatment operation. The SAL is operating under interim status under the physical/chemical

treatment test facility Part A permit application that was submitted in 1988. The purpose of the SAL is to remove certain materials that have been added to the tank waste as part of the analytical process (such as nitric acid, chloride) before sending the waste to tank farms. PNL is proposing that the SAL and 325 HWTU be combined under one RCRA permit application since the SAL is located in the same building as the 325 HWTU and the two units would be supporting and performing similar activities. If the two units were combined, PNL would only be required to write one Part B permit application, and it would also simplify the permit review process. Ms. Wallace acknowledged that combining the two units would be a sensible approach; however, she expressed a concern with possibly duplicating both the review process and the generation of notice of deficiencies (NODs). Ms. Poston noted that the two operations are very similar, and the NOD comments for 325 could probably be incorporated into the SAL activities. Mr. Clark also suggested that the parties could utilize Ecology's proposed modification of the permit review cycle, which involves only one review cycle and then setting up a series of working meetings among the parties to resolve the issues. Ms. Wallace stated she would discuss the consolidation proposal within Ecology.

3. Permit Application Schedule

Ms. Poston stated that the 325/3100 units are meshed in the permit, and the permit would have to be redone if the 3100 unit is removed. If 3100 is separated out from the permit, Ms. Poston recommended including the SAL at that point. Ms. Poston also suggested Ecology provide any NOD comments to PNL on an informal basis, which would assist in rewriting the permit. Ms. Wallace indicated she would continue with her review of the permit, and agreed to provide NOD comments on an informal basis.

4. General Discussion

- Ms. Wallace requested that a tour of the 325 HWTU and SAL be scheduled concurrently, and it was agreed to arrange the tour to follow the next Unit Managers Meeting. Ms. Wallace also requested that a copy of the floor plans be provided to her before the tour, and PNL took an action to provide the floor plans by November 15, 1993.

5. Status Action Items

- There was one new action item for PNL to provide Ecology a copy of the floor plans for the 325 unit.

6. Set Next Meeting Date

- The next Unit Managers Meeting was scheduled for December 1, 1993.

Attachment 4

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October 28, 1993
9:00 a.m. to 10:30 a.m.

Action Items

Action Item #

Description

10-28-93:1

PNL will provide Ecology (J. Wallace) a copy of the 325 Hazardous Waste Treatment Unit and 325 Shielded Analytical Laboratory floor plans by November 15, 1993.

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	BS-18

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

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(509) 372-3596.