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Meeting Minutes Transmittal

325 HAZARDOUS WASTE TREATMENT UNITS
Unit Managers Meeting
337 Building, Mt. Rainier
Richland, Washington

June 28, 1995
2:00 p.m. to 3:30 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

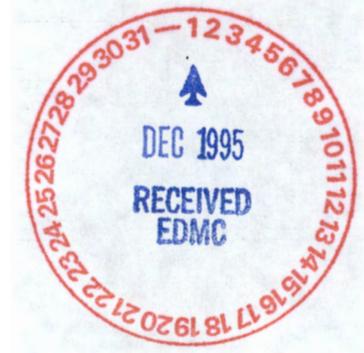
Jeanne J. Wallace Date: _____
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325 Hazardous Waste Treatment Unit, PNL Concurrence

Kathleen A. Poston Date: 8/24/95
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 HAZARDOUS WASTE TREATMENT UNITS
Unit Managers Meeting
337 Building, Mt. Rainier
Richland, Washington

June 28, 1995
2:00 p.m. to 3:30 p.m.

Agenda

1. Approval of Past Unit Managers Meeting Minutes (Ecology/RL/PNL)
2. New DOE-RL Unit Manager and PNL Contractor Representative (RL/PNL)
3. 325 HWTUs Start-up Schedule (RL/PNL)
4. 325 HWTUs Part B Permit Application, Rev. 1 (Ecology/RL/PNL)
 - New Submittal Date Letter (RL/PNL)
 - Document Status (RL/PNL)
 - Future Comment Resolution Workshops (Ecology/RL/PNL)
 - Proposed Draft Schedule for Part B Application Development (RL/PNL)
5. Status of 325 HWTUs NOI for Tank Storage (RL/PNL)
6. Treatment by Generator Activities in the HWTU (RL/PNL)
7. Status Action Items (Ecology/RL/PNL)
 - New Action Items
 - Old Action Items
8. General Discussion (Ecology/RL/PNL)
9. Next Unit Managers Meeting (Ecology/RL/PNL)
 - Proposed during week of July 27
 - Proposed topics

Attachment 2

325 HAZARDOUS WASTE TREATMENT UNITS
Unit Managers Meeting
337 Building, Mr. Rainier
Richland, Washington

June 28, 1995
2:00 p.m. to 3:30 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Unit Managers Meeting Minutes

The May 31, 1995 Unit Manager Meeting minutes were approved.

2. New DOE-RL Unit Manager and PNL Contractor Representative

Ms. K. Poston (PNL) stated that Mr. G. Thornton (PNL) will be replacing her as the technical contact and the PNL contractor representative when the transfer of the unit is made to the Waste Management Organization.

Mr. C. Delannoy (DOE-RL) will be the new DOE-RL unit manager for the unit.

3. 325 HWTU Start-up Schedule

Ms. K. Poston (PNL) stated that startup was tentatively scheduled for mid to late July. DOE concurred that the unit was ready. As soon as PNL determines the new management structure, the unit will begin operations.

4. 325 HWTU Part B Permit Application, Rev. 1

- New Submittal Date Letter

A letter identifying the new submittal date for the Part B permit application is in RL review.

- Document Status

The Part B permit application is on schedule for the new submittal date. Mr. M. Cline (WHC) requested feedback from Ms. J. Wallace (Ecology) regarding which Part B checklist she preferred to use. Ms. Wallace responded that she did not have any preference. Following a brief discussion, it was decided to use Ecology's new checklist to maintain consistency with other unit Part B's that will be submitted in the near future.

- **Future Comment Resolution Workshops**

Mr. Cline stated that the comment resolution workshops are scheduled to commence at the first part of 1996.

- **Proposed Draft Schedule for Part B Application Development**

Mr. Cline outlined the proposed schedule for the Part B permit application development as follows: 1) Submit Part B in November 1995 to Ecology for 90-day review and comment; 2) 30-day RL/PNL review of Ecology comments; 3) Initiate workshops to resolve comments.

5. **Status of 325 HWTUs NOI for Tank Storage**

Mr. Cline stated that the Notice of Intent (NOI) is in RL/PNL review until July 13, 1995, and it is scheduled for submittal to Ecology on September 15, 1995. A 150-day waiting period will follow, and then RL will submit the Part A permit application to Ecology.

6. **Treatment by Generator Activities in the HWTU**

Mr. M. Riess (PNL) initiated a discussion regarding dilution of waste to meet the 340 waste acceptance criteria. Dangerous waste generated from K-basin waste characterization activities at the 327 building did not meet 340 waste acceptance criteria. The preferred disposal pathway was to transfer the waste to the HWTU (room 528) where it would be diluted for placement down the RLWS to the 340 facility. A discussion ensued where the regulatory options for conducting the dilution, including using treatment by generator, were discussed. It was concluded that by coordinating the waste transfers with line flushes, the waste acceptance criteria could be achieved without additional dilution. PNL will pursue this method for waste transfers.

Ms. J. Wallace (Ecology) asked if the K-basin waste being brought in to be characterized was a dangerous waste. Mr. M. Riess (PNL) stated that it wasn't. It was a spent nuclear fuel and therefore was not a dangerous waste. Mr. M. Riess also stated that the dangerous waste issue had been evaluated and there was a letter addressing the regulatory status of the K-basin waste. He stated he would obtain a copy for Ms. J. Wallace (Ecology).

7. **Status Action Items**

- **New Action Items**

Mr. M. Riess (PNL) will provide Jeanne Wallace (Ecology) with a letter concerning the regulatory status of the K-basin waste being characterized at the 327 building.

- Old Action Items

There were no old action items to status.

8. General Discussion

A brief discussion was held regarding PNL's reorganization, and a status will be provided at the next meeting.

9. Next Unit Managers Meeting

- The next Unit Managers Meeting was scheduled for August 24, 1995, from 2 to 3:30 p.m.

- Proposed Topics

Topics for discussion at the next Unit Managers Meeting will include a status of the submittal date letter for the Part B, HLRF slab tanks, the NOI for TK-1 tank, PNL's reorganization and an update on transition plans.

Attachment 4

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Richland, Washington

June 28, 1995
2:00 p.m. to 3:30 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
03-13-95:1	RL will provide Ecology (Ms. J. Wallace) a letter outlining the following: 1) WHC and Battelle noncompliance regarding the 300 Area rad liquid waste system (RLWS); 2) RL's proposal for splitting the RLWS system between WHC and Battelle. ACTION: B. Day (PNL) CLOSED
03-13-95:2	Provide Ms. Wallace a package containing information pertaining to the original 1989 Part A withdrawal requests for the 332 Storage Facility and the 324 Sodium Removal Pilot Plant. ACTION: B. Day (PNL) CLOSED
06-28-95:1	PNL will provide Ecology with a letter concerning the regulatory status of the K-basin waste being characterized at 327 (Ecology). ACTION: M. Riess (PNL) OPEN

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	PNL	P7-79
C. R. DeLannoy	RL	A5-15
D. L. Duncan	EPA Region 10	HW-106
G. D. Hendricks	GSSC	B1-42
K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
G. T. Thornton	PNL	P8-45
H. T. Tilden II	PNL	P7-68
P. J. Turner	PNL	P7-34
M. C. Vargas	RL	K8-50
J. J. Wallace	Ecology	B5-18
S. L. Warren	PNL	P8-45
RCRA Files/GHL	WHC	H6-23

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

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

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail
 Stop HW-074 (Records Center)

Please send comments on distribution list to B. J. Day (P7-79), (509) 376-3835