

Meeting Minutes – Approval

Issue Resolution Workshop
For

T Plant Complex Part B Permit Application – Working Draft

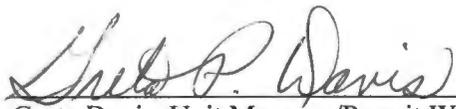
2355 Stevens, Conference Room 203
Richland, Washington
Meeting Held May 31, 2001
From 2:30 to 4:00 PM

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EDMC

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


Date: 13 Dec 2001
Michael Collins, Project Manager Representative, RL/WMD

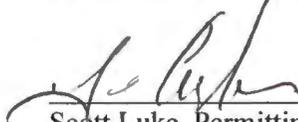

Date: 9/10/01
Greta Davis, Unit Manager/Permit Writer, Washington State Department of Ecology

T Plant Complex – Contractor Concurrence


Date: 9/10/01
Brett Barnes, Environmental Compliance Officer, T Plant Complex, FH/WMP

Not Present

Date: ~~9/10/01~~ SMB 9/14/01
Paul Crane, FH/Waste Management Project Office


Date: 7/9/01
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
For
T Plant Complex Part B Permit Application – Working Draft 1**

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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
 - 2706-TA berm removal
 - 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

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

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Summary of Discussion and Commitments/Agreements

1. Workshop Process

- **Approval of past workshop minutes**
Minutes for the May 1, 2001 meeting were approved by Ecology.

2. WD-1 Review Status/Activities.

- **M-91 status**
(Note: These T Plant Complex workshops include discussion of Milestone M-91, *COMPLETE THE ACQUISITION OF NEW FACILITIES, MODIFICATION OF EXISTING FACILITIES, AND/OR MODIFICATION OF PLANNED FACILITIES NECESSARY FOR STORAGE, TREATMENT/PROCESSING, AND DISPOSAL OF ALL HANFORD SITE TRU/TRUM, LLMW, AND GTC3*. T Plant workshop meetings to-date have focused on Milestone M-91-03, *SUBMIT HANFORD SITE TRU/TRUM WASTE PROJECT MANAGEMENT PLAN (PMP) TO ECOLOGY PURSUANT TO AGREEMENT SECTION 11.5*. The *M-91 Transuranic Waste Project Management Plan* identifies T Plant as the M-91 capability for transuranic and transuranic mixed waste processing. However, because this capability will not be developed at T Plant until 2006, M-91 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, response to Ecology comments on the *M-91 Transuranic Waste Project Management Plan* was extended to June 26, 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. In accordance with Section II.Y.2.c, satisfaction of corrective action requirements must be documented at the time closure certification is presented to Ecology. If corrective action requirements are not satisfied by closure activities, the remaining corrective action requirements and the RPP or CPP process under which they will be satisfied and the schedule under which they will be satisfied must be documented. Part B Permit text will be provided to Ecology that reflects this requirement.
- **221-T Tank System closure agreement letter**
FH, RL, Ecology and EPA met on May 14, 2001 at the Kennewick office of Ecology to discuss EPA comments on the 221-T Tank System closure agreement letter delivered to Ecology on March 9, 2001. A letter has been generated that summarizes the discussions and commitments from this meeting. The letter is anticipated to reach Ecology and the EPA before the next workshop and identifies the type of information that would be provided to regulators at an as-yet

unscheduled workshop for resolution of 221-T Tank System waste management issues.

- **2706-TA berm removal**

Figure 2-5 of WD-1 was revised to reflect removal of a concrete curb in the 2706-TA Building per ECN 653678. The revised figure was provided to Ecology at this workshop as T Plant Part B master redline/strikeout Figure 2-5. Ecology acceptance of this figure closes Action Item #10.

- **Status Ecology review of Chapter 7.0, Building Emergency Plan (BEP)**

Ecology (Davis) indicated that she and Steve Moore had finished reviewing the T Plant Complex Part B, Appendix 7A, *Building Emergency Plan for the Treatment Facility*, dated February 1, 2001 and had no comments. This version will replace current WD-1 Appendix 7A, dated March 8, 2000.

- **New Ecology comments/issues**

None.

- **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.

3. Workshop Action Items

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

- **Action Item #5:** The 222-S WAP that will be used as a model for the T Plant WAP is still awaiting public review of the 222-S Part B Permit Application during HF RCRA Permit Modification F for final approval. However, preparation of a T Plant WAP will begin using the 222-S WAP format.
- **Action Item #9:** Will be revised to reflect the commitment to provide Ecology with Corrective Action text.
- **Action Item #10:** Closed based on Ecology acceptance of revised Figure 2-5.

4. Date of Next Workshop

- The next workshop was tentatively set for June 26, 2001. Based on the availability of Dave Bartus of EPA (whose schedule was not known at the time of this meeting), the June workshop meeting would focus on resolution of TSCA storage issues for waste in the 221-T Tank System.

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>Revised May 31, 2001</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
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.