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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 8, 2016

16-NWP-131

By certified mail

Mr. Doug S. Shoop, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

Re: Dangerous Waste Compliance Inspection on November 18, 2015 at the T-Plant Complex,
RCRA Site ID: WA7890008967, NWP Compliance Index No. 15.549

Dear Mr. Shoop and Mr. Ciucci:

Thank you for your staff's time during the T-Plant Complex inspection on November 18, 2015. The Department of Ecology's (Ecology) compliance report of this inspection is enclosed. The report cites 5 areas of non-compliance and 2 concerns listed in the compliance problems section of the report.

To return to compliance, complete the actions required and respond to Ecology within the timeframes specified. Include all supporting documentation in your response, (such as photographs, records, and statements explaining the actions taken and dates completed). Submit this information to Jared Mathey at 3100 Port of Benton Boulevard, Richland, Washington 99354.

Failure to correct the deficiencies may result in an administrative order, a penalty, or both, as provided by the Hazardous Waste Management Act (Revised Code of Washington 70.105.080 and .095). Persons who fail to comply with any provision of this chapter are subject to penalties of up to \$10,000 per day per violation.

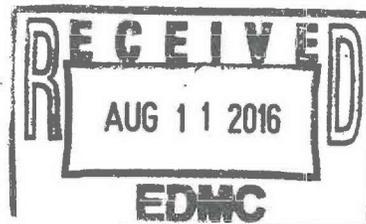
If you have questions or need further information, please contact me at jared.mathey@ecy.wa.gov or (509) 372-7949.

Sincerely,

Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tkb
Enclosure

cc: See page 2



577851

Mr. Shoop and Mr. Ciucci
August 8, 2016
Page 2 of 2

16-NWP-131
T-Plant Complex
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 15.549
Inspection Date: November 18, 2015

cc electronic w/enc:

Dave Bartus, EPA
Sheryl Bilbrey, EPA
Jack Boller, EPA
Lucy Edmondson, EPA
Dennis Faulk, EPA
Emy Laija, EPA
Mark Macintyre, EPA
Kim Ogle, EPA
Kevin Schanilec, EPA
Cheryl Williams, EPA
Duane Carter, USDOE
Cliff Clark, USDOE
Michael Collins, USDOE
Al Farabee, USDOE
Tony McKarns, USDOE
Julie Reddick, USDOE
Wade Woolery, USDOE
Allison Wright, USDOE
Moses Jaraysi, CHPRC
David Richards, CHPRC
Joel Williams, Jr., CHPRC
Jon Perry, MSA
Ken Niles, ODOE
Shawna Beryen, DOH
John Martell, DOH
Caroline Cress, AGO
Andy Fitz, AGO
Kelly Wood, AGO

Debra Alexander, Ecology
Randy Bradbury, Ecology
Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Lois Dahmen, Ecology
Stuart Luttrell, Ecology
Jared Mathey, Ecology
John Price, Ecology
Darin Rice, Ecology
Ron Skinnarland, Ecology
Alexandra Smith, Ecology
John Temple, Ecology
Cheryl Whalen, Ecology
CHPRC Correspondence Control
Environmental Portal
Hanford Facility Operating Record

cc w/enc:

Steve Hudson, HAB
Administrative Record
NWP Central File
NWP Compliance Index File: 15.549

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
NWP Reader File

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AUG 11 2016
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**Washington Department of Ecology
Nuclear Waste Program
Compliance Report**

Site: T-Plant Complex **RCRA Site ID:** WA7890008967
Inspection Date: November 18, 2015
Site Contacts: Joel Williams, Regulatory Inspection Lead,
CH2M HILL Plateau Remediation Company (CHPRC)
Tony McKarns, United States Department of Energy – Richland Office
(USDOE-RL)
Phone: (509) 376-4782 – Joel Williams **FAX:** N/A
Site Location: 200 West Area, Hanford Site
Benton County, Washington
At This Site Since: 1945 **NAICS#:** 56221, 924110, 54171
Current Site Status: Treatment, Storage, and Disposal Facility (TSDF)/Large Quantity Generator
Operating Unit Group # 9

Ecology

Lead Contact: Jared Mathey **Phone:** (509) 372-7949 **FAX:** (509) 372-7971
Other Representatives: Kathy Conaway (Ecology Compliance Support) and Stuart Luttrell (Ecology Project Support)

Report Date: August 8, 2016
Index: #15.549
Report By: Jared Mathey



(Signed) 8/8/2016
(Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource and Conservation Recovery Act of 1976, as amended (RCRA) facility even though the Hanford Site contains numerous processing areas spread over large geographic area. The Hanford Site is a tract of land approximately 583 square miles and is located in Benton County, Washington. This site is divided into distinct dangerous waste management units which are administratively organized into "unit groups." A unit group may contain only one dangerous waste management unit or many; currently, there are 37 unit groups at the Hanford Site. Individual dangerous waste management units utilize only a very small portion of the Hanford Site. Additional descriptive information on the individual dangerous waste management units is contained in unit group permit applications and in Parts III, V, and VI of the Hanford Facility RCRA Permit, Dangerous Waste Portion, WA7890008967, Revision 8C (hereafter referred to as the Permit).

Owner/Operator

The United States Department of Energy – Richland Operations Office (USDOE-RL) is the owner and operator of the T-Plant Complex (T-Plant) and oversees waste management and cleanup activities ongoing on the Hanford Site. CH2M HILL Plateau Remediation Company (CHPRC) is contracted by the USDOE-RL to co-operate the T-Plant and associated dangerous waste management units, which

includes performing waste treatment, storage, and disposal (TSD) activities, conducting waste characterization, designation, and transportation services.

Facility Background

The 221-T Building is a canyon facility that was built for chemical separation of plutonium from uranium and fission products contained in irradiated fuel elements. Construction began in 1943 and operated as a facility for separation of plutonium from 1945 to 1956. In 1957, the T-Plant was converted to a radiological decontamination facility. The T-Plant includes multiple facilities, buildings, and storage areas used for treating and storing dangerous waste and radioactively contaminated dangerous waste (mixed-waste).

The T-Plant submitted a Part A permit application for dangerous waste and mixed-waste storage and treatment, and mixed-waste operations under interim status regulations, which began August 8, 1987. A Dangerous Waste Part B Application was submitted to Washington State Department of Ecology (Ecology) in 2002. An updated Part B application was submitted to Ecology on January 27, 2016. T-Plant is an active dangerous waste storage and treatment facility in support of Hanford Site cleanup. T-Plant has a work schedule, milestone (M-091-44T), outlined in the Hanford Federal Facility Agreement and Consent Order (HFFACO), also known as the Tri-Party Agreement (TPA). Other permits for T-Plant include AIR-07-306 (Notice of Construction (NOC) Radioactive Air Permit); AIR-06-1013 (NOC Radioactive Air Permit; DE-01NWP-002R1 (NOC Non-Radioactive Air Permit); and HAN-099 (Onsite Sewage System Permit).

The types of waste that T-Plant can manage include dangerous waste, low level radioactive waste (LLW), mixed low level waste (MLLW), transuranic waste (TRU), transuranic mixed-waste (TRUM), and Toxic Substance Control Act of 1976 (TSCA) polychlorinated biphenyls (PCB). T-Plant capabilities provide capacity for treating and repackaging MLLW and TRUM, including waste sorting, processing, and volume reduction.

Current T-Plant projects and activities include: storage of mixed-waste in containers (drums and boxes); repackaging of waste packages being prepared for the Waste Isolation Pilot Plant certification; headspace drum sampling; venting of containers and installing NucFil® filters; identifying, verifying, sampling, treating, and repackaging of dangerous waste and mixed-waste; macro-encapsulation; and void filling.

Compliance Background for T-Plant

Inspection (Compliance Index Number 00.183) - July 11, 2000 – Ecology conducted a dangerous waste compliance inspection at T-Plant. Ecology cited violations with designation, container labeling, and general waste analysis regarding drums that were thought to be mixed-waste soil that had been stored onsite since the 1970s, and transferred to T-Plant in 1998. Twenty five of these drums did not meet a T-Plant waste acceptance criteria where characterization of the mixed-waste using knowledge was unknown. The 25 drums of stored contaminated soil was not properly designated, not properly labeled, and therefore, managed in a non-compliant manner for two years or longer. On October 11, 2000, Ecology issued Notice of Correction No. 00NWPKW-1684 to USDOE and Fluor Hanford, Inc. Below are the violations that Ecology cited in the compliance report and Notice of Correction.

- Violation 1 - USDOE and Fluor Hanford, Inc. failed to meet the requirements of WAC 173-303-070 for designating dangerous waste.

Twenty-five (25) 2714-U drums have remained undesignated since their generation in the 1970's. Two of the 25 drums contained completely unknown waste and had no identification labels on them. Ecology was told that the wastes were suspected to be soil/sediment sampling and drilling wastes from various ponds, cribs, and trenches; however, insufficient process knowledge exists to confirm this. The contents of the drums have never been sampled.

- Violation 2- USDOE and Fluor Hanford, Inc. failed to meet the requirements of WAC 173-303-300(1) to confirm knowledge that a waste is properly designated before the waste is stored, treated, or disposed. USDOE and Fluor Hanford, Inc. failed to meet the requirements of WAC 173-303-300(2) to obtain a detailed chemical analysis of the waste before the waste is stored, treated, or disposed. USDOE and Fluor Hanford, Inc. failed to meet the requirements of WAC 173-303-300(5) to develop a Waste Analysis Plan meeting the requirements of this section. The facility did not follow the requirements of their waste analysis plan for proper management of the waste.

USDOE and Fluor Hanford, Inc. did not properly manage the 25 drums from 1997 to the present (more appropriately from the 1970's to the present). There was no analytical data of the contents of the drums and the process knowledge was insufficient for proper management of the waste. Two of the drums (2714U-97-014 and 2714U-97-016) never had their contents identified in all the years of being stored on site. The Waste Analysis Plan for T-Plant required that the waste be identified prior to being stored. The Waste Analysis Plan also requires that the waste be isolated until the waste has been characterized. The drums have been co-mingled with other wastes at the facility and have not been sampled to confirm their contents.

- Violation 3 – USDOE and Fluor Hanford, Inc. failed to meet the requirements of WAC 173-303-630(3) on the identification of containers.

Drums 2714U-97-014 and 2714U97-016 are reported to contained unknown contents. The drums have RCRA hazardous waste labels and Department of Transportation corrosive labels on them and are marked pH<2. It is not understood how these two containers contained unknown contents can be positively labeled with this information. In addition, all the drums were stored for nearly a year on the 209-E pad with "Waste Pending Analysis" on them. In fact no samples were ever taken from the drums at that time. This is interpreted to be a falsification of labeling.

Inspection (Compliance Index Number 05.261) - July 19, 2005 – Ecology conducted a dangerous waste compliance inspection at T-Plant. Ecology cited concerns with designation, general waste analysis, and improper management of waste containers in storage at T-Plant. Stored containers of waste were found to be partially designated and had incorrect waste stream descriptions. Ecology issued a letter of concern to USDOE-RL and Fluor Hanford, Inc. on November 19, 2005, informing USDOE-RL and Fluor Hanford Inc. that insufficient knowledge of waste being stored could lead to violations.

Inspection (Compliance Index Number 07.280) - June 26, 2007 – Ecology conducted a dangerous waste compliance inspection of T-Plant. Ecology cited one violation for incorrect designation which is described below from the compliance report:

- Violation 1 – WAC 173-303-070(3) requires waste designations be conducted to determine if a waste is dangerous or extremely hazardous in order to properly manage and dispose of the waste. Proper waste designation includes identification and application of appropriate waste codes and identification of major risks.

USDOE and Fluor Hanford, Inc. failed to meet these requirements in the following ways.

- Liquid gasoline, kerosene, and petroleum based ignitable wastes were discovered stored in 5-gallon plastic carboy containers within the 214-T Building. In over ten months, these materials had not been designated per WAC 173-303-070 through 100.
- Container #RHZ-241-A19182 has been in storage for many years without designation. Solid Waste Information Tracking System (SWITS) information for this container listed a flash point as <38 degrees F, indicating a D001 ignitable hazardous waste.
- The contents inventory sheet for container # 221T-97-0031PX (also identified as #9521569) lists a total of 28 inner containers of “unknown” contents. The SWITS 310 report documented this 55-gallon drum as dangerous waste; however, no waste codes were applied to the drum’s contents. Also, documentation indicated that the last addition to the drum was 1/30/1998, and that it was “full.” It appeared this drum containing dangerous waste was being stored with incomplete designation since that time.

The compliance report also cited three concerns for waste accumulation, container labeling, and personnel training. A concern was cited for waste that was accumulated for extended periods of time without adequate or correct designation. The second concern was for container labeling. It appeared incomplete, and not reflecting the actual waste stored in the container. The final concern was training records that were not being kept for on-the-job training listed as required in the dangerous waste training plan and interim status standards.

Ecology issued a Notice of Violation to USDOE and Fluor Hanford, Inc. on March 8, 2008.

Inspection (Compliance Index Number 10.305) - September 22, 2010 – Ecology conducted a dangerous waste compliance inspection of T-Plant, and referred the findings to Region 10 EPA in a referral letter May 22, 2013. The letter explained that because a compliance inspection performed by EPA’s National Enforcement Investigations Center had recently been conducted and it was more comprehensive (including some scope overlap), Ecology determined that EPA could decide the outcome.

EPA National Enforcement Investigation Center Inspection - March 14, 2011 – the National Enforcement Investigation Center conducted a compliance inspection of the Hanford Solid Waste Operating Complex (SWOC), which included T-Plant. The inspection findings led to a Consent Agreement and Final Order (CAFO) between USDOE-RL, CHPRC, and EPA.

EPA Inspection - June 26, 2013 – EPA, Region 10 issued a consent agreement for alleged violations of RCRA at the Hanford Site. The findings of the violations were based on what was identified by the National Enforcement Investigation Center during an inspection at SWOC in 2011. The consent agreement identified the following violations: 1) operating eight treatment, storage, and/or disposal (TSD) units at SWOC without authorization; 2) failure to have adequate closure plans for those units; 3) failure to close or obtain an extension to operate two inactive TSD units; and 4) failure to properly treat waste before placement inside burial grounds 31 and 34 as required by land disposal restriction requirements. In the consent agreement, USDOE-RL agreed to 1) submit closure plans for the eight dangerous waste management units as permit modifications and to close those units according to the permit; 2) immediately comply with applicable final facility standards at these eight units; 3) submit closure plans or request permit authorization for two inactive dangerous waste management units; 4) cease treatment of waste within the burial grounds; and 5) pay a penalty of \$137,000. Violations at eleven other SWOC dangerous waste management units were referred to Ecology in EPA letter OCE-127, dated June 10, 2013, in respect to eleven units, including the inadequacy of closure plans for those units for determining appropriate permit action.

Ecology Agreed Order and Stipulated Penalty No. DE 10156, with USDOE and CHPRC dated January 24, 2014— Result of Ecology inspections conducted at the Central Waste Complex on March 7, 8, 14, and 15, 2012, and at the Waste Receiving and Processing Facility on May 20, 2012, July 27, 2012, and September 17, 2012. In addition to addressing the Central Waste Complex and Waste Receiving and Processing facility TSD unit groups identified in Exhibit A of the Order, Exhibit A also includes actions for another TSD unit group within SWOC, the T-Plant TSD unit group, in order for that unit group to implement actions similar to ones being taken at the Waste Receiving and Processing Facility and Central Waste Complex TSD units. The TSD unit groups consist of the dangerous waste management units listed in Exhibit B.

Inspection (Compliance Index Number 14.506) - October 22, 2014 – This was an Ecology dangerous waste inspection of the Central Waste Complex, T-Plant, the Waste Receiving and Processing facility, and the Low-Level Burial Grounds Trenches 31 and 34, conducted in response to the EPA referral letter. The focus was on closure, closure plans, and permit authorization. The inspection cited three violations for the Central Waste Complex and the Waste Receiving and Processing Facility. USDOE-RL agreed to close eight of the units per an EPA consent agreement and final order (CAFO). However, EPA identified the remaining 11 units as unauthorized TSD units and Ecology as the permitting authority and best positioned to determine the appropriate path for authorization of these units. The units at T-Plant which USDOE-RL has agreed to close include: 271-T cage, 211-T pad, 221-T sand filter pad, 221-T R5 waste storage area, and 277-T outside storage area. T-Plant units for Ecology to determine permit authorization: 243-T covered storage pad, 211-T cage, 2706-T yard, 2706-T pad, and 221-T bone yard.

Inspection (Compliance Index Number 15.513) – January 22, 2015 – This was an Ecology dangerous waste inspection of T-Plant that cited the following violations:

- Violation 1 – Recordkeeping Violation – WAC 173-303-380(1)
 - Documentation provided for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009 listed that a receipt date for storage at the facility was “N/A” because the waste was generated at T-Plant.
- Violation 2 – Recordkeeping Violation – WAC 173-303-380(3)(a)
 - Training records for the Environmental Manager and the CHPRC Single Point of Contact were requested during the January 22, 2015, inspection, and were not provided to Ecology when requested. CHPRC responded to the Ecology request by stating, Mr. Brian J. Dixon and Mr. Wayne Toebe are employees of CH2M Hill Plateau Remediation Company. Mr. Dixon is the Decommissioning, Waste, Fuels, and Remediation Services Environmental Compliance and Records Director and Mr. Toebe is a Senior Regulatory Advisor. Their positions are not related to dangerous waste management duties at T-Plant and are thus not included in the T-Plant Dangerous Waste Training Plan.
- Violation 3 – Missing Inspection Records – WAC 173-303-320(2)(d)
 - DO-040-016, Revision 9, Perform Weekly and Daily Surveillance of Waste Management Area’s (WMA) states, weekly inspections are conducted at all T-Plant WMAs and Waste Accumulation Areas (WAAs) once each calendar week regardless of the activities being performed. No documentation of inspection for the week of 3/2/2014 through 3/8/2014 was included in the inspection records provided to Ecology.
- Violation 4 – Inconsistent Inspection Records - WAC 173-303-320(2)(d) and Agreed Order and Stipulated Penalty, DE10156, Appendix A, Section 1.10.2.2
 - For the 214-T Building inspection performed on 10/7/2014, the inspector identified a “crack in floor” with a listed disposition of “floors to be repainted after CWC.” Weekly Appendix A data sheets through 11/12/2014 revealed the same notations. The weekly Appendix A data sheet for 11/20/2014 listed the condition of “Containment system are free of cracks, gaps, deterioration” as “SAT.” The data sheet failed to include the date and nature of any repairs or remedial actions taken. The data sheet for the inspection during the week of 12/9/2014 listed the condition of “Containment system are free of cracks, gaps, deterioration” as “UNSAT.” The problem is not noted on the following weekly inspection log. This data sheet did not include the date and nature of any repairs or remedial actions taken.
- Violation 5 – Incomplete Training Plan – WAC 173-303-330(2)(a)
 - T-Plant Dangerous Waste Training Plan, Table 3-1 – *Job Titles/Positions at T-Plant*, identifies job titles/positions for personnel that carry out job duties relating to the T-Plant waste management duties. The list of job titles/positions fails to include personnel (as defined in WAC 173-303-040) who:
 - Prepare and/or maintain records as required in WAC 173-303.
 - Provide training required under the dangerous waste training plan.
 - Provide dangerous waste regulation interpretations which affect dangerous waste management operations.
 - Are responsible for notifications as required in WAC 173-303.
 - Perform emergency response efforts required under WAC 173-303.

- Violation 6 – Improper Labeling – WAC 173-303-630(3)
 - Containers #0077128 and #0079701 located in Building 214-T storage were labeled with the Department of Transportation Class 9 shipping labels. The inspector observed no other risk labels on the two containers that indicated the major risk(s) associated with the waste.

Inspection Summary

Ms. Conaway and I arrived at T-Plant at 9:00 a.m. on November 18, 2015. We met Joel Williams, CHPRC Environmental Inspection Coordinator, at the 271T Building, where we signed in for access to the facility. Mr. Williams escorted us to the MO-892 Building for the inspection pre-briefing. We were joined by the following individuals:

Dave Richards, CHPRC, T-Plant Operations Manager
Joel Williams, CHPRC, Environmental Inspection Coordinator
Lee Tuott – CHPRC, Acting Environmental Compliance Officer (ECO)
Sasa Kosjerina – CHPRC, Environmental Specialist
Mitch Boyd – CHPRC, Regulatory Specialist
Amanda Ramirez – CHPRC, Project Manager for Waste Disposition
Tony McKarns - USDOE-RL, Environmental Compliance

After introductions, Mr. Richards provided a safety briefing for T-Plant. I asked if there were any types of treatment being conducted at T-Plant. Mr. Richards explained they treated four 55-gallon drums of contaminated used oil generated from the 45 ton mechanical crane located in the T-Plant canyon. The treatment included absorbent to meet the acceptance criteria at another Treatment Storage and Disposal Facility (TSDF). Ms. Conaway asked where the oil waste was currently stored. Mr. Richards said it was stored at 221-T Head End. Ms. Conaway asked what TSDF they were planning on sending the waste oil to. Mr. Richards said he was not sure and would need to check, but thought it was PermaFix Northwest. Ms. Conaway asked if there were any repackaging activities occurring at T-Plant. Mr. Richards answered no.

Mr. Richards said in September 2015, the T-Plant canyon deck was opened for manned entry and maintenance activities. He explained they were replacing light bulbs, checking fire extinguishers, and doing air monitoring activities in the T-Plant Canyon Deck. Mr. Richards said there was T-Plant canyon deck construction activities planned in the spring of 2016 for 2018 acceptance of K Basin Sludge. Mr. Richards said the K Basin Sludge Project and T-Plant operations were scheduled together.

We left MO-892 and went to the Operations Gallery of T-Plant. Mr. Richards showed us the dangerous waste management unit, 221-T Operations Gallery Storage and explained that it was currently empty and locked. Mr. Richards opened the storage cabinet. I observed that the 221-T Operations Gallery Storage dangerous waste management unit was empty and had a sign on the front stating T-Plant Dangerous Waste Management Area – Unauthorized Personnel Keep Out. Ms. Conaway asked if Mr. Richards kept the key to the dangerous waste management unit. Mr. Richards said that Operations and Nuclear Chemical Operators (NCOs) have keys and sometimes that Radiologic Control Technicians (RCT) are issued keys. On the way to Section 18 of the Operations Gallery, Mr. Richards explained they would be installing spill pallets with leak detection along with stainless steel casks in T-Plant

canyon cells to treat the K Basin Sludge. At Section 18 of the Operations Gallery, Mr. Richards showed me the inside of the T-Plant canyon deck on the video monitors.



DSC01103 – Operations gallery video monitor of T-Plant canyon deck

We walked to 221-T Head End of the T-Plant canyon where we were introduced to Mr. Dave Volmer, Senior Radiological Control Technician. Mr. Richards explained the entry requirements and introduced Mr. Volmer who would perform a survey for radiation contamination before exiting 221-T Head. We proceeded inside to 221-T Head End where I observed five 55-gallon drums labeled as Hazardous Waste with a major risk of toxic and included WT02 waste code. I observed that all containers were closed and had a waste accumulation start date of November 10, 2015.

Note: On the mixed-waste container inventory sheet provided to me during the inspection, I observed that the containers in 221-T Head End had a storage acceptance date of November 10, 2015.

Mr. Richards said that the five drums would be moved to another dangerous waste management unit storage area of T-Plant, as the Head End area of T-Plant does not store waste long term. He explained it was located at 221-T Head because of the location of the crane and the removal of the crane oil. I asked if there was any spill control equipment in the area. Mr. Richards showed me spill control equipment on shelves near to the drums and said that their main spill control equipment was located in the main pipe gallery. We left the Head End including a survey for radioactive contamination by Mr. Volmer.



DSC01104 – Five 55-gallon hazardous waste drums of contaminated crane oil at 221-T Head End

We exited 221-T and went out to the back side of T-Plant. Mr. Richards showed us 221-T-BY. I observed items labeled low level radioactive waste (LLW) in 221-T-BY. Mr. Richards said these were HEPA pre-filters at T-Plant that were recently replaced in July 2015 and were determined to only be LLW. Next, Mr. Richards showed us 277-T Building and explained that this is a closing unit that is no longer storing any waste. Mr. Richards explained that this building is now used as equipment storage, but that it was used previously to over-pack waste. In 277-T Building, I observed two drums with container numbers 0040604 and 0059318. Mr. Richards said these two drums are used for testing radiological sources and were not dangerous or mixed-waste. I observed that 277-T Building was filled with storage equipment.

We left and walked around the back side of 277-T Building, where I observed an open front storage shed with numerous empty drums inside. Mr. Richards said this was called 210-T and was not a T-Plant dangerous waste management unit. We continued around the back side of 221-T, where Mr. Richards showed us the 221-T Sand Filter Pad Area and 221-T R5 dangerous waste storage area. I observed that part of the 221-T R5 tent cover had been damaged. Mr. Richards said it was damaged by the windstorm the previous day. I observed that the 221-T R5 was storing empty new drums. Mr. Richards walked us outside of the enclosure and said that the dangerous waste management unit also included the asphalt pad.

Continuing around T-Plant, I observed a large building that was fenced in. Mr. Richards said this building was called 224-T and was not a part of the T-Plant Complex. In walking around to the front of T-Plant, I observed a covered waste storage area. Mr. Richards said this was dangerous waste management unit 243-T Covered Pad. I did not observe any waste within the dangerous waste management unit. I observed that 243-T Covered Pad was only surrounded by intermittent concrete barriers with a single chain around 2 feet high between barriers.



DSC01107 – 243-T Covered Pad

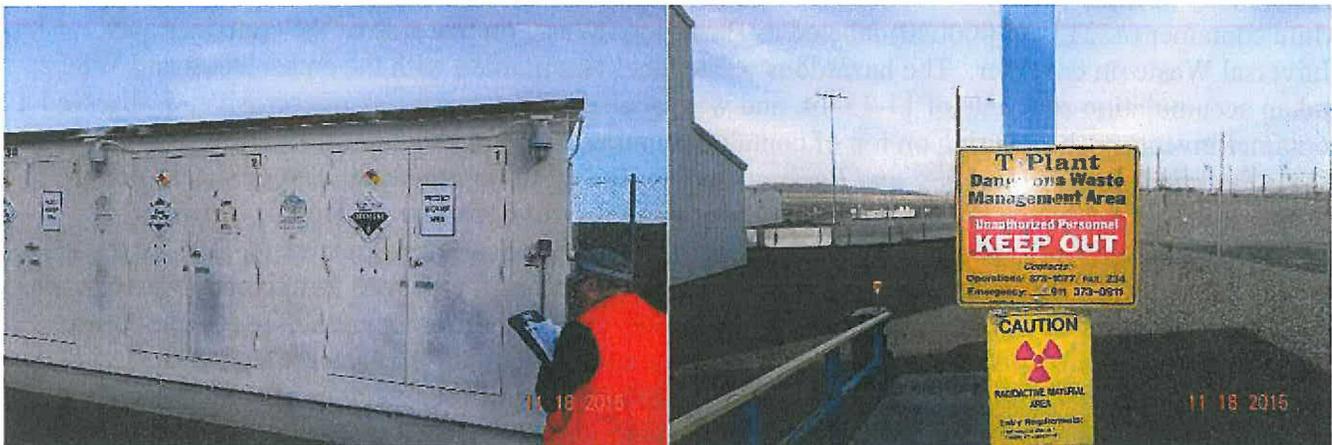
We continued around the front of T-Plant to 2706-T Pad. I observed that 2706-T Pad was surrounded by intermittent concrete barriers with a single chain around 2 feet high between barriers. On a post holding up the chain, I observed a sign stating “T-Plant Dangerous Waste Management Unit Area – Unauthorized Personnel Keep Out”. I also observed a container with number 0022097, labeled as Hazardous Waste and a sign stating “Caution contains PCBs” and PCB out of service date 7-11-2005.



DSC01108 – 2706 T-Pad

Mr. Richards opened the front gate to the 2706 T-Yard. I observed a sign stating “T-Plant Dangerous Waste Management Unit Area – Unauthorized Personnel Keep Out” on the entrance to the 2706 T-Yard.

Inside of the 2706 T Yard, I observed one drum of waste inside of a locked Connex box. I observed container 0047674 dated with a storage date of November 4, 2002, and was listed with dangerous waste codes, D002, D006, D007, D008, D010, F001, F002, F003, F004, and F005. I observed that the drum was labeled as hazardous waste and corrosive. I asked if the Connex box was kept locked and Mr. Richards answered yes. Mr. Richards said the entire asphalt area along with the two Connex boxes could be used to store waste. Mr. Richards said the other Connex box was currently being used to store product. Mr. Richards opened the Connex box and I observed a product called Turco Decon inside of the container. We walked out the back of the dangerous waste management unit, up a ramp, and through a single chain. Outside of this single chain, I observed that the back end of 2706 T-Yard was not enclosed by fencing, but had a chain at the top of the ramp along with a sign stating “T-Plant Dangerous Waste Management Unit Area – Unauthorized Personnel Keep Out”.



DSC01110 – Container holding Turco Decon Product DSC01112 – Posted signs at the back of 2706 T-Yard



DSC01109 - Back end of 2706 T-Yard

Mr. Richards walked us to the 2706-TA Building. Mr. Richards said that 2706-TA Building includes the asphalt pad outside. Mr. Richards took us into the 2706-TA Building and explained that this dangerous waste management unit was used for remote venting equipment. We did not enter the 2706 T Building because it was marked as a contamination area.

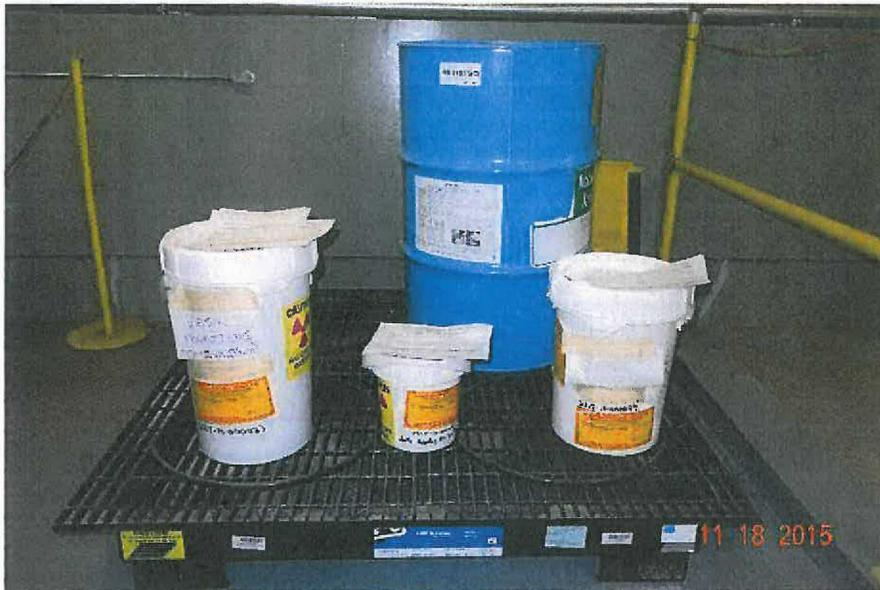
We walked next door and entered the 2706-TB Building, which holds the 2706-TB Tank System dangerous waste management unit. I observed a sign stating “T-Plant Dangerous Waste Management Unit Area – Unauthorized Personnel Keep Out” on the door to 2706-TB. Mr. Richards said that the tank system was totally blanked off, deactivated and was going to be closed. Inside of 2706-TB, I observed two large stainless steel tanks (Tanks TA and TB). We left 2706-TB Building and Mr. Richards showed us the 221-T Railroad Cut, a dangerous waste management unit.

We walked to 214-T Building and entered the building. I observed that half of the floor to the building had been recoated with what appeared to be an Epoxy and that the other half had repairs completed to the cracks in the floor. Mr. Richards said they were waiting for the filler to meet its total cure time of seven days before recoating the other side of the floor. I observed numerous containers of universal waste, many of them with dates within weeks of a one year accumulation period. I observed a small white container (#221T-14-000020) labeled as Hazardous Waste on one side of the container and Universal Waste on the other. The hazardous waste label was marked with the codes D009 and WSC2, had an accumulation start date of 11-13-14, and was labeled with a major risk of corrosive. I observed a container inventory sheet sitting on top of container number 221T-14-000020 titled, *Universal Waste/Recycle Material Handling and Packaging*. I picked up the container inventory sheet, took a picture of it, and stated that the container inventory sheet for this container was titled, *Universal Waste/Recycle Material Handling and Packaging*, but was labeled as hazardous waste. Mr. Tuott said that the container was being handled as Mixed-Waste, but was being managed as universal waste in the paperwork. I requested a copy of the container inventory sheet for this container. Next to container 221T-14-000020, I observed a second hazardous waste container (#0089852) stored in 214-T. I did not observe that either of these two containers were included on the current inventory of dangerous and mixed-waste at T-Plant provided to me during the inspection.



DSC01113 – Containers of waste in 214-T Building DSC01114 – Containers 221T-14-000020 and 0089852

On a separate spill pallet in 214-T, I observed three containers with numbers 221T-15-000023, 221T-15-000024, and 221T-15-000025, labeled as Hazardous Waste, and marked as, “Waste Awaiting Designation.” I observed that none of these three containers were included on the current inventory list of dangerous and mixed-waste storage at T-Plant that was provided to me during the inspection (See Addendum A). Behind these three containers, I observed a waste container labeled as low level radioactive waste. On the other side of the room, I observed spill control equipment.



DSC01116 – Containers 221T-15-000023, 221T-15-000024, 221T-15-000025 marked “Waste Awaiting Designation” in 214-T Building

We departed the 214-T Building and were shown the 211-T Pad, which is a closing dangerous waste management unit. I did not observe any waste in the unit. Next we were shown the 211-T Cage. I observed that 211-T Cage had a covered roof and was surrounded with a chain link fence with a sign stating “T-Plant Dangerous Waste Management Unit Area – Unauthorized Personnel Keep Out” on the entrance. I observed a fire extinguisher next to the entrance of 211-T Cage with the most recent service inspection month of November 2015. I did not observe any waste in the 211-T Cage. We walked back near the main entrance to T-Plant where I observed the 271-T Cage, which is a closing dangerous waste management unit. I did not observe any waste stored in the dangerous waste management unit, but I did observe trash cans stored inside. Mr. Richards said that they were storing carts and new trash cans in the dangerous waste management unit.



DSC01117 – 271-T Cage storing carts and new facility trash cans

I asked if I could go back to 243-T before breaking for lunch. I walked the concrete barriers and chain around the dangerous waste management unit and did not see any signs stating “Danger-Unauthorized Personnel Keep Out”, or any sign with an equivalent legend, as required under Washington Administrative Code 173-303-310(2)(a). We broke for lunch.

At Building MO-892, we began our documents review and questioning part of the inspection. I asked if the T-Plant Training Plan, Waste Analysis Plan, and Building Emergency Plan have changed since last year’s Ecology inspection. Mr. Williams said that none of these documents have changed since the last inspection. I asked if the container I observed in 214-T with both a hazardous waste label and universal waste label was being managed as an accumulating generator waste or if it was being managed in storage at T-Plant. Mr. Williams said it was considered in storage. Mr. Richards said that when it started being generated, it was dangerous waste and that they were continually adding leaky batteries to the container.

I asked if there have been any spills at the facility since the last inspection. Mr. Richards said they had a forklift spill anti-freeze onto a flatbed truck. He explained that the spill did not go to soil, but that some leaked to the asphalt under the flatbed. I asked who the Building Emergency Director was for T-Plant today. Mr. Richards said that the Building Emergency Director was Andy Mix, another Operations Shift Manager. I said that I wanted to check this with the Hanford Patrol Operations Center (POC). I called the Hanford POC at (509) 373-3800 and I walked outside due to the bad cellular reception. When the POC answered the phone, I introduced myself, stated the call was not an emergency, and explained that I was conducting an inspection of T-Plant today and needed to verify who the Building Emergency Director was for today. I spoke with Captain Reed who answered that the Building Emergency Director for T-Plant was Andy Mix. Mr. Reed verified my name and agency and I thanked him for his time and said goodbye. I walked back inside of Building MO-892 and said that the POC verified that the Building Emergency Directory for T-Plant today was Andy Mix.

I asked if I could see a copy of the T-Plant Building Emergency Plan and DOE/RL-94-02. Mr. Richards showed me a hard copy of the T-Plant Building Emergency Plan Revision 26 and a copy of the Hanford Emergency Management Plan DOE/RL-94-02 on the computer projection screen. I asked how the outside perimeter gates were managed at T-Plant. I asked if they left the gates open all the time, or are they opened or closed on a set schedule. Mr. Richards said they have the gate on a timer. He explained that the gate opens at 5:00 a.m. and closes at 5:00 p.m. Monday through Thursday and remains closed Friday, Saturday, and Sunday, unless opened for access. Mr. Richards explained that the gate can be opened with an electronic code or hard master key for the lock.

I asked if there is an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel. Mr. Richards said their PAX (Private Automatic Exchange) system is used for those means. I asked if there is a device, such as a telephone or a hand-held, two-way radio, capable of summoning emergency assistance. Mr. Richards said that they use two-way radios which have an emergency channel. He explained that everybody working at T-Plant is issued a radio. I asked if there are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment at the T-Plant, and if so where are they located. Mr. Richards said that supplies were located all throughout the plant, but that their main storage for supplies is located in the pipe gallery and is maintained monthly.

Ms. Kim Tarter, Records Specialist, joined us for the document review. I asked if I could see their Dangerous Waste Training Plan. Ms. Tarter showed me PRC-STD-TQ-40228 *T-Plant Dangerous Waste Training Plan Rev. 0, Change 2 - 9/30/13*. I asked if I could see the different types of worker titles by job position. Ms. Tarter showed me Table 3.1. I asked if I could see T-Plant's Waste Analysis Plan. Ms. Tarter showed me their Waste Analysis Plan, HNF-9921 Revision 6.

I asked Ms. Tarter if she could show some weekly dangerous waste inspection records for the month of October. She put up several examples. On one of the filled out inspection logs, I observed the inspector did not write their printed name on the inspection log. I observed what appeared to be the first name initial and the last name of the inspector on the inspection log. I said I understood there was some historical reason for people signing their names with their initials and last name, but that Ecology looks for the first and last name on these forms. I explained I understood that supervisors review the inspection logs and that it would be a good thing to catch and fix with the people performing the inspections so that no violations would be issued when we come out to do inspections. Mr. McKarns said that they considered the first and middle initials and the last name to be the printed name of the inspector. I asked if I could see the closure plan for 2706-TB tank systems. Ms. Tarter brought up the closure plan for T-Plant where I observed the 2706-TB tank systems identified in several locations.

I went through the preliminary list of records I wanted to request for this inspection. I said I would be asking for all inspection records for the month of October 2015 as well as the most recent semi-annual and annual inspections at T-Plant. I asked if there were documents that outlined their inspection schedule requirements for T-Plant. Mr. Richards said they had their inspection schedule in procedures that were not considered enforceable documents. I said that I would like to request them anyway so I could get a perspective of the types of inspections that were being conducted with their respective frequencies. I asked what I should call these records in my records request. Mr. Richards said these records were called the Duty Operations Supervisor (DOS) Tickler Sheet and the Solid Waste

Operations Complex (SWOC) Surveillance Tracking Procedure. I said I would request training records for Terry Whitcomb – Maintenance Craft, Laura Johnson – Nuclear Chemical Operator, and Andy Mix – Operations Supervisor. Mr. Williams asked I put the two records I received during the inspection, (i.e. Copy of Container Inventory Sheet 221T-14-000020 and current inventory of dangerous and mixed-waste) on my request for tracking purposes. I coordinated delivery dates of my records request and timing for records request submittal with Mr. Williams. I thanked everybody for their time, and we departed the facility at 1:18 p.m.

Documents Review

I observed the following daily, weekly, monthly, and quarterly inspection and duty operation summaries on the “DOS Tickler Sheet.” I observed that all dailies were completed Monday through Thursday, except for 221-T Surveillance and 2706-T Surveillance which are conducted seven days a week.

Daily Inspections

- 221-T Surveillance (DO-040-001)
- 2706-T Surveillance (DO-040-020)
- SOE Surveillance (DO-040-015)
- Update 291-T/2706-T Filter DP Spreadsheet
- Print Verify Start of Shift SWITS Inventory (SWIR330)
- Equipment Status Checklist
- Weather Forecast Log Entry (10/1- 03/31)
- SWOC TSR Surveillance Checklist
- Status Board Update
- Update Crew Absence Tracking
- Update Suspect TRU open container inventory
- Update 221T Confinement Ventilation Log
- Waste Area Inspection (D0-040-016) Facility / Canyon / Tunnel
- Paperwork for following shift
 - Mask Log Check
 - Key Box Checklist
 - 221-T Exit Checklist (DO-040-001)
 - 2706-T Exit Checklist (DO-040-020)
 - Update/Send T-Plant Project Daily Status
 - Print Verify End of shift SWITS Inventory (SWIR330)
 - T-Plant Operations Logbook

Other - Daily Inspections

- Tank and Sump Level Readings
 - 5-6
 - 5-7
 - RR Sump
 - TA Sump

Weekly Inspections

- 2706T Fire System Pressure Check <TSR> (D0-040-004)
- Portable Safety Shower/Eyewash (D0-040-004)
- Cold Weather (D0-040-005) – (10/1 through 3/31)
- Decon Safety Shower (D0-040-004)
- Waste Area Inspection (D0-040-016) Facility / Canyon / Tunnel
- Ops Mgr Logbook Review (PRC-PRO-OP-24382)
- NCOs Briefed on Training Schedule (Mondays)
- Idle Clark Forklifts for 10 minutes
- Receive Laundry
- End of week- Shut off 3rd Floor AMU lights

Monthly Inspections

- Combustible Material Control <TSR> (D0-040-024) Gallery / Canyon / 214T/277T / 2706T/TA/TB / Outside
- Fire Extinguisher (D0-040-004)
- Communication Equipment (D0-040-004)
- AED/First Aid Kit Inspection (D0-040-004)
- Emergency Response Cage Inspection (D0-040-004)
- Verify Timely Orders within 1-year of Issue
- Facility Siren Test: Sect 18 RM206 Last Monday of the Month between 1300-1315 hrs.
- Send in Respiratory Control Log sheets to Tonya Bean HB-23 or email if none issued. (First week of new Month)
- Turn in Vehicle Utilization Logs (First Week of Month)

Quarterly Inspections

- Review LOTO's 1-2-3-4
- Review Operator Aids 1-2-3-4
- Review Miscellaneous Facility Tags 1-2-3-4

Daily Inspections

T-Plant Complex

I reviewed the DO-040-001 Appendix A - T-Plant Complex Daily Surveillance Data Sheet inspection logs for the month of October, 2015. I observed that the inspections occurred on Monday's through Thursday's. I did not observe the printed name of the inspector on the October 1, 2015, October 5, 2015, October 6, 2015, October 7, 2015, October 8, 2015, October 12, 2015, October 13, 2015, October 15, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, and October 28, 2015 inspection logs. Instead, I observed what appears to be the first and middle initial with the printed last name of the inspector on the inspection logs.

I reviewed the DO-040-001 Appendix B - T-Plant Complex Facility Closure Day Surveillance Data Sheet inspection logs for the month of October, 2015. I observed that the inspections occurred on Friday's through Sunday's. I did not observe the printed name of the inspector on the October 2, 2015, October 3, 2015, October 4, 2015, October 23, 2015, October 24, 2015, October 25, 2015, October 30, 2015, and October 31, 2015 inspection logs. Instead, I observed what appears to be the first initial and sometimes middle initial with the printed last name of the inspector on the inspection logs.

I reviewed the DO-040-001 Appendix C - T-Plant Complex Facility Exit Inspection Data Sheet inspection logs for the month of October 2015. I observed that the inspections occurred on Monday's through Thursday's. I did not observe the printed name of the inspector on the October 1, 2015, October 5, 2015, October 6, 2015, October 7, 2015, October 8, 2015, October 12, 2015, October 13, 2015, October 14, 2015, October 15, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, October 28, 2015, and October 29, 2015 inspection logs. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of the inspector on the inspection logs. I did not observe the time of the inspection on any of the inspection records for the month of October 2015.

2706-T

I reviewed the DO-040-020 Appendix A - 2706-T Daily Surveillance Data Sheet for October 2015. I observed that the inspections occurred on Monday's through Thursday's. I did not observe the printed name of the inspector on the October 1, 2015, October 12, 2015, October 13, 2015, October 14, 2015, October 15, 2015, October 19, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, October 28, 2015, and October 29, 2015 inspection logs. Instead, I observed what appears to be the first initial and in some cases the middle initial with the printed last name of the inspector on the inspection logs.

I reviewed the DO-040-020 Appendix B - 2706-T Facility Closure Day Surveillance Data Sheet for October 2015. I observed that the inspections occurred on Friday's through Sunday's. I did not observe the printed name of the inspector on the October 2, 2015, October 3, 2015, October 4, 2015, October 23, 2015, October 24, 2015, October 25, 2015, October 30, 2015, and October 31, 2015 inspection logs. Instead, I observed what appears to be the first initial and in some cases the middle initial with the printed last name of the inspector on the inspection logs.

I reviewed the DO-040-020 Appendix C - 2706-T Facility Exit Inspection Data Sheet for October 2015. I observed that the inspections occurred on Monday's through Thursday's. I did not observe the printed

name of the inspector on the October 1, 2015, October 12, 2015, October 13, 2015, October 14, 2015, October 15, 2015, October 19, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, October 28, 2015, and October 29, 2015 inspection logs. Instead, I observed what appears to be the first initial and in some cases the middle initial with the printed last name of the inspector on the inspection logs.

Weekly Inspections

Portable Safety Shower/Eyewash Station Inspection

I reviewed the DO-040-004 Appendix A - Portable Safety Shower/Eyewash Station Inspection Checklist in 214-T for the month of October 2015. I did not observe the printed name of the inspector on the October 6, 2015, October 21, 2015, and October 28, 2015 inspection records. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of the inspector on the inspection logs. I did not observe the time of the inspection on the October 14, 2015 inspection log.

Decon Shower

I reviewed the DO-040-004 Appendix G - Weekly Decon Shower Inspection Checklist for October 2015. I did not observe the printed name of the inspectors on the October 5, 2015, October 13, 2015, October 21, 2015 and October 29, 2015 inspection records. Instead, I observed what appears to be the first initial and sometimes middle initial with the printed last name of the inspector on the inspection logs.

2706-T Complex Fire System Pressure Check

I reviewed the DO-040-004 Appendix I - Weekly 2706-T Complex Fire System Pressure Check inspection logs for October 2015. I did not observe the printed name of the inspector on the October 1, 2015, October 14, 2015, October 19, 2015, and October 28, 2015 inspection logs. Instead, I observed what appears to be the first initial and sometimes middle initial with the printed last name of the inspector on the inspection logs.

Waste Management Areas

I reviewed the DO-040-016 Appendix A - T-Plant Weekly Waste Management Area Inspection Data Sheet for October 2015. I observed that these inspections covered HS-030 and HS-032 Storage Modules in 2706-T Yard, 2706-T Yard, 2706-T and TA Buildings and Outdoor Storage Areas, 2706-T Asphalt Pad, 221-T Railroad Tunnel (outdoor storage area), 214-T Building, 211-T Cage, 221-T BY Storage (Boneyard), 243-T Covered Storage Pad, 221-T Ops Gallery Storage, 221-T Head End and Ramp, 271-T Mezzanine Tank, and closed waste storage areas. I did not observe the printed name of the inspector on the October 5, 2015, October 6, 2015, October 12, 2015, October 13, 2015, October 26, 2015, and October 27, 2015 inspection logs. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of the inspector on the inspection logs. I observed that dangerous waste container inspections in 214-T were conducted on October 6, 2015, October 13, 2015, (7 days) October 19, 2015, (6 days) and October 26, 2015 (7 days). I observed that dangerous waste container inspections for HS-030 and HS-032 Storage Modules in 2706-T Yard were conducted on October 5, 2015, October 12, 2015, (7 days) October 20, 2015 (8 days), and October 26, 2015 (6 days).

T-Plant Canyon/Tunnel Weekly Waste Management Area

I reviewed the DO-040-016 Appendix B - T-Plant Canyon/Tunnel Weekly Waste Management Area Inspection Data Sheet for October 2015. I did not observe any problems with these inspection records.

Monthly Inspections

Fire Extinguisher Inspection

I reviewed the DO-040-004 Appendix B - Monthly Fire Extinguisher Inspection Checklist for the month of October 2015. I observed that the inspections were conducted on October 5, 6, and 7, 2015, but I could not determine which fire extinguishers were inspected on particular dates. I did not observe the printed name for all of the inspectors on the inspection log. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of two inspectors with one inspector putting their full printed first and last name on the inspection log.

First Aid Kit/AED Emergency Medical Bag Inspection

I reviewed the DO-040-004 Appendix C - Monthly First Aid Kit/AED Emergency Medical Bag Inspection Checklist for October 2015. I observed that inspections were conducted on October 5, 2015 and October 7, 2015, but I could not determine what date was associated for the particular equipment inspected on the inspection logs. I did not observe the printed name for all of the inspectors on the inspection log. Instead, I observed what appears to be the first initial with the printed last name of the two inspectors on the inspection log.

Automatic Sprinkler System Inspection Checklist

I reviewed the DO-040-004 Appendix D - Monthly Automatic Sprinkler System Inspection Checklist for October 2015. I observed that the inspections were conducted on October 5, 2015 and October 13, 2015, but I could not determine which parts of the system were inspected on what dates. I did not observe the printed name of the inspectors on the inspection logs. Instead, I observed what appears to be the first initial and in the other case, first and middle initial with the printed last name of two inspectors on the inspection log.

Emergency Response

I reviewed the DO-040-004 Appendix E - Monthly Emergency Response Cage Inspection Checklist for October 2015. I observed that the inspection was conducted on October 5, 2015. I did not observe the printed name of the inspector on the inspection log. Instead, I observed what appears to be the first initial with the printed last name of inspector on the inspection log.

Communication Equipment

I reviewed the DO-040-004 Appendix F - Monthly Communication Equipment Inspection Checklist for October 2015. I observed that the inspections were conducted on October 5, 2015 and October 7, 2015, but I could not determine the specific date when equipment was inspected on the inspection log. I did not observe the printed name of the inspectors on the inspection log. Instead, I observed what appears to be the first initial with the printed last name of inspectors on the inspection log.

Annual Ignitable Reactive Inspection

I reviewed the annual ignitable inspection of container areas where ignitable and reactive wastes were stored. I observed that the annual ignitable inspection of the 2706-TA, 214-T, and 2706-T occurred on

October 14, 2015. I observed that the annual ignitable inspection of the 221-T Tunnel occurred on October 22, 2015. I observed that the annual ignitable inspection of the 221-T Deck occurred on October 27, 2015. I observed that the inspection logs indicated that no ignitable and reactive waste were currently stored at the T-Plant Complex.

Training Records

I reviewed training records for Terry Whitcomb – Maintenance Craft, Laura Johnson – Nuclear Chemical Operator, and Andy Mix – Operations Supervisor against PRC-STD-TQ-40228 *T-Plant Dangerous Waste Training Plan Revision 1, Change 0*, Dated January 13, 2016. I did not observe any problems with these training records.

Waste Activity Questions

In my records request, I asked CHPRC if there are any Satellite Accumulation Areas or 90-day areas at T-Plant as of the day of the inspection and I received the below response.

No, there are not any satellite accumulation areas (SAA) or 90 Day accumulation areas within the T-Plant Complex TSD boundary

In a records request, I requested clarification if containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were either being stored or accumulated. I also asked why container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were not on the record inventory sheet provided during the inspection if these waste streams had been accepted for storage into a dangerous waste management unit at the T-Plant. I received the below response to these questions:

Containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 are generated as TSD waste containers and are being managed in permitted storage. These waste streams are stored at 214-T before being transferred for final treatment, storage, and/or disposal as appropriate.

Refer to DOE/CHPRC Response to Item Number 11.

My records request question for item Number 11, I asked “Containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were labeled as hazardous waste and waste awaiting designation. When these containers were accepted into T-Plant for storage, was the waste acceptance process followed for SWOC acceptance criteria? If you followed this process, provide documentation used for container acceptance.” I received the below response to this question.

T-Plant generates dangerous and/or mixed-waste while processing and/or maintenance activities. This waste material consists of items including, but not limited to: personal protective equipment, rags, and spent equipment contaminated with dangerous cleaning agents, lubricants, paints run-off or other dangerous materials that designate as dangerous waste when discarded. Operational Knowledge is used to characterize these waste materials for the purposes of waste designation. Waste generated by T-Plant is considered accepted at T-Plant when the waste is generated.

Waste Container Data Sheet Review

I requested copies of waste container datasheets for container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 (See Addendum B) and observed the following.

- Container Number 0089852 – I observed that waste described as concrete dust/paint grout was added to the container on October 5, 2015 and waste described as paint chips/grout was added to the container on November 10, 2015. I observed that an accumulation start date of October 5, 2015 was written on the waste container data sheet.
- Container Number 221T-14-000020 – I observed that the container inventory sheet was titled “Universal Waste/Recycle Material Handling and Packaging”. I observed that an accumulation start date of November 13, 2014 was written on the waste container data sheet. I observed that waste was added to the container on the following dates, November 13, 2014, January 15, 2015, March 10, 2015, July 1, 2015, August 10, 2015, September 15, 2015, and October 28, 2015. I observed that the waste was described as leaking alkaline batteries.
- Container Number 221T-15-000023 - I observed that waste described as Shell Alumna Grease, CSH Silicone, alkaline batteries, and Clear Brite glass cleaner 16 ounce, was added to the container on September 22, 2015. I observed that an accumulation start date of September 22, 2015, a notation stating “214-T waste awaiting designation”, and a waste type of mixed-waste was written on the waste container data sheet.
- Container Number 221T-15-000024 - I observed that waste described as alkaline batteries and flashlight cases was added to the container on October 15, 2015. I observed that an accumulation start date of October 15, 2015, a notation stating “214T waste awaiting designation”, and a waste type of mixed-waste was written on the waste container data sheet.
- Container Number 221T-15-000025 - I observed that waste described as an empty 12-ounce non-punctured can of WD-40 was added to the container on November 17, 2015. I observed that an accumulation start date of September 22, 2015, a notation stating “214T waste awaiting designation,” and a waste type of mixed-waste was written on the waste container data sheet.

Container Waste Designation Records Request

In a subsequent records request received by Ecology on April 28, 2016, I asked to provide designation records for containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 and received the below response and a SWIR310 report for each of the containers:

Note: These containers that have waste in them are awaiting waste analysis results so that proper waste designation can be performed by the Waste Management Representative.

I observed the following summarized information (Dated April 19, 2016) from the SWIR310 reports provided to Ecology on April 28, 2016 (See Addendum C):

- Container 0089852
 - Container contents: Paint and concrete debris
 - Accumulation Date: 10/05/2015
 - Source: 271T
 - RCRA Designated Date: Not documented (i.e. left blank)

- TSD Received Date: Not documented (i.e. left blank)
- TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-14-000020
 - Container Contents: Leaking alkaline batteries
 - Accumulation Date: 11/13/2014
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000023
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000024
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 10/15/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000025
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

Land Disposal Restriction Time Limit Question

In my records request, I asked “During the November 18, 2015, inspection of T-Plant, I was told that Container 221T-14-000020 being stored in building 214-T was being managed as dangerous waste. I observed the waste storage date of November 14, 2014, on the container. Explain how storage of this waste beyond one year was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal under 40 CFR 268.50(c).”, and I received the following response:

The waste in container 221T-14-000020 that is being stored in 214-T consist of leaking alkaline batteries. The waste is assigned the dangerous waste numbers of WSC2 (State-only Corrosive

Waste) and WT01 (State-only Toxic Extremely Hazardous Waste). Since this waste is regulated only by the state, it is not subject to the Land Disposal Restriction 1-year clock.

I was unsure how CHPRC could answer the question relating to land disposal restrictions, if the waste in container 221T-14-000020 was not designated.

Note: In my records request, I stated that I observed a waste storage date of November 14, 2014, on container number 221-T-14-000020; however, I actually observed that November 14, 2014, was the waste accumulation start date.

Note: Agreed Order and Stipulated Penalty, No. DE10156, between USDOE-RL, CHPRC, and Ecology, Exhibit A, *Required Actions Under Chapter 173-303 WAC*, Section 1.8, *General Waste Analysis for Treatment, Storage, and/or Disposal Activities*, states:

The SWOC units are TSDs that provide container storage and treatment for dangerous and/or mixed-waste, including the retrievably stored mixed transuranic waste being retrieved from the Hanford Facility Low-Level Burial Grounds. SWOC units manage both retrieval waste, as well as newly generated waste. The waste received and processed by SWOC has been generated both on and off the Hanford Site.

SWOC waste management processes include the following:

- Assessment and evaluation of the waste stream information. This process ensures conformance with SWOC waste acceptance requirements prior to acceptance of the waste at the SWOC unit. Exhibit A: Required Actions Under Chapter 173-303 WAC*
- Completion and submittal of a waste stream data package.*
- Receipt and acceptance of dangerous and/or mixed-waste.*
- Management of the accepted waste for storage and/or treatment.*
- Generation of new dangerous or mixed-waste during processing.*

SWOC units manage these types of waste: 1) newly generated waste from both on-site and off-site of Hanford, 2) waste transferred between SWOC units, 3) retrieval waste, and 4) SWOC unit generated waste.

Agreed Order and Stipulated Penalty, No. DE10156, between USDOE-RL, CHPRC, and Ecology, Exhibit A, Section 1.8.6, states:

USDOE and CHPRC will document in the operating record all records required by WAC 173-303-380, including the following:

- 1) the waste acceptance and confirmation process for each waste accepted;*
- 2) the results of all tests and samples; and*
- 3) Analytical results, including QA/QC results.*

Agreed Order and Stipulated Penalty, No. DE10156, Between USDOE-RL, CHPRC, and Ecology, Exhibit A, Section 1.8.8, states,

Confirmation and/or characterization by USDOE and CHPRC will include the following: The WAP will specify for each waste type accepted into SWOC (newly generated, transferred waste, RSW waste, and waste generated during SWOC operations) a process for confirming the dangerous waste characteristics of the waste. This process could include representative sampling and analysis, chemical screening, NDE or visual verification to help ensure that the contents of the container match the knowledge about the waste stream. For direct testing, testing parameters and required methods must be in accordance with WAC 173-303-110 as specified in the WAP.

Unauthorized Dangerous Waste Management Units Storing Non-Dangerous Waste

I received the following response in my records request, when I asked "Explain how unauthorized dangerous waste management units that are not closed (e.g. 271-T Cage and 277-T Building) and are

being used to store non-dangerous wastes are protective of human health and the environment. Include responses for all areas meeting this criteria”:

277-T Building and 271-T Cage are material and equipment storage areas. No dangerous and/or mixed-waste is stored at 277-T Building and 271-T Cage.

Security Question

In my records request, I asked “Is there a 24 hour surveillance system which continuously monitors and controls entry to the T-Plant complex?”, and I received the following response:

The entire Hanford Facility is a controlled access area with 24-hour surveillance and access control system for protection of government property. The Hanford Patrol maintains a continuous presence of protective force personnel to provide security.

Compliance Problems

The Dangerous Waste inspection on November 18, 2015, found the following compliance problems.

Each problem is covered in three parts:

- (1) **Citation from the regulations**
- (2) **Specific observations** from the inspection that highlight the problem
- (3) **Required actions** needed to fix the problem and achieve compliance.

The problems listed below must be corrected to comply with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Complete the required actions listed below and respond to Ecology at the following address within the timeframes listed in the Action Required section of this compliance report. Include all supporting documentation such as photographs, records, and statements explaining the actions taken and dates completed to return to compliance.

Attention: Jared Mathey
Washington Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd
Richland, WA 99354

You may request an extension of the deadlines to achieve compliance. Make the request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to Jared Mathey before the date specified above. Ecology will provide a written approval or denial of your request.

**If you have any questions about information in this Compliance Report, please call:
Jared Mathey at (509) 372-7949**

This does not relieve you of your continuing responsibility to comply with the regulations at all times.

- 1) **WAC 173-303-070(3) Designation procedures. (a) To determine whether or not a solid waste is designated as a dangerous waste a person must: (i) First, determine if the waste is a listed discarded chemical product, WAC 173-303-081; (ii) Second, determine if the waste is a listed dangerous waste source, WAC 173-303-082; (iii) Third, if the waste is not listed in WAC 173-303-081 or 173-303-082, or for the purposes of compliance with the federal land disposal restrictions as adopted by reference in WAC 173-303-140, determine if the waste exhibits any dangerous waste characteristics, WAC 173-303-090; and (iv) Fourth, if the waste is not listed in WAC 173-303-081 or 173-303-082, and does not exhibit a characteristic in WAC 173-303-090, determine if the waste meets any dangerous waste criteria, WAC 173-303-100.**

(3)(c) For the purpose of determining if a solid waste is a dangerous waste as identified in WAC 173-303-080 through 173-303-100, a person must either: (i) Test the waste according to the methods, or an approved equivalent method, set forth in WAC 173-303-110; or (ii) Apply

knowledge of the waste in light of the materials or the process used, when: (A) Such knowledge can be demonstrated to be sufficient for determining whether or not it designated and/or designated properly; and (B) All data and records supporting this determination in accordance with WAC 173-303-210(3) are retained on-site.

Observations: During the November 18, 2015 inspection of T-Plant, I observed container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were labeled as Hazardous Waste and were in storage at dangerous waste management unit 214-T at T-Plant. I observed container number 221T-14-000020 was labeled as Hazardous Waste on one side of the container and Universal Waste on the other. I observed a container inventory sheet sitting on top container number 221T-14-000020 titled, *Universal Waste/Recycle Material Handling and Packaging*. Mr. Tuott, CHPRC, Acting Environmental Compliance Officer, told me that container number 221T-14-000020 was being handled as mixed-waste, but was being managed as universal waste in the paperwork. I observed container numbers 221T-15-000023, 221T-15-000024, and 221T-15-000025 were marked as, "Waste Awaiting Designation."

I observed accumulation start dates for the following container numbers:

- 0089852 – October 5, 2015
- 221T-14-000020 – November 13, 2014
- 221T-15-000023 – September 22, 2015
- 221T-15-000024 – October 15, 2015
- 221T-15-000025 – September 22, 2015

In a subsequent records request received by Ecology on April 28, 2016, I asked CHPRC to provide designation records for containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025. I received the below response along with the following summarized information provided to me from the Hanford Solid Waste Information and Tracking System (Dated April 19, 2016):

Note: These containers that have waste in them are awaiting waste analysis results so that proper waste designation can be performed by the Waste Management Representative.

- Container 0089852
 - Container contents: Paint and concrete debris
 - Accumulation Date: 10/05/2015
 - Source: 271T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)
- Container 221T-14-000020
 - Container Contents: Leaking alkaline batteries
 - Accumulation Date: 11/13/2014
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)

- TSD Received Date: Not documented (i.e. left blank)
- TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000023
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000024
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 10/15/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000025
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

2) WAC 173-303-400(3), referencing WAC 173-303-300, as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.

WAC 173-303-300(1) Purpose. This section requires the facility owner or operator to confirm his knowledge about a dangerous waste before he stores, treats, or disposes of it. The purpose for the analysis is to insure that a dangerous waste is managed properly.

WAC 173-303-300(2) The owner or operator must obtain a detailed chemical, physical, and/or biological analysis of a dangerous waste, or nondangerous wastes if applicable under WAC 173-303-610(4)(d), before they store, treat, or dispose of it. This analysis must contain the information necessary to manage the waste in accordance with the requirements of this chapter. The analysis must include or consist of existing published or documented data on the dangerous waste, or on waste generated from similar processes, or data obtained by testing, or a combination of these.

(2)(a) When an owner or operator relies on knowledge from the generator for waste designation or for this detailed analysis (commonly known as a waste profile) instead of analytical testing of a sample, that information must be documented and must meet the definition of "knowledge" as defined in WAC 173-303-040. To confirm the sufficiency and reliability of the "knowledge" used for the waste profile, the facility must do one or more of the following:

(i) Be familiar with the generator's processes by conducting site visits, and reviewing sampling data and other information provided by the generator to ensure they are adequate for safe management of the waste;

(ii) Ensure waste analysis contained in documented studies on the generator's waste is based on representative and appropriate sampling and test methods;

(iii) Compare the generator's waste generating process to documented studies of similar waste generating processes to ensure the waste profile is accurate and current;

(iv) Obtain other information as predetermined by the department on a case-by-case basis to be equivalent.

(2)(b) As required in WAC 173-303-380(1)(c), records must be retained containing specific information that show compliance with this subsection for sufficient and reliable information on the waste whether the owner or operator relies on analytical testing of the waste or knowledge from the generator, or a combination of these.

Observations: CHPRC and USDOE-RL did not obtain a detailed chemical, physical, and/or biological analysis of dangerous waste in container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025, before they stored the waste at T-Plant in 214-T.

During the November 18, 2015 inspection of T-Plant, I observed container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were labeled as Hazardous Waste and were in storage at 214-T. I observed that container numbers 221T-15-000023, 221T-15-000024, and 221T-15-000025 were marked as, "Waste Awaiting Designation". I observed that container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were not included on the current inventory of dangerous and mixed-waste stored at T-Plant that was provided to me during the inspection.

In a subsequent records request received by Ecology on April 28, 2016, I asked CHPRC to provide designation records for containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025. I received the below response along with the following summarized information provided to me from the Hanford Solid Waste Information and Tracking System (Dated April 19, 2016):

Note: These containers that have waste in them are awaiting waste analysis results so that proper waste designation can be performed by the Waste Management Representative.

- Container 0089852
 - Container contents: Paint and concrete debris
 - Accumulation Date: 10/05/2015
 - Source: 271T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-14-000020
 - Container Contents: Leaking alkaline batteries
 - Accumulation Date: 11/13/2014
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000023
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000024
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 10/15/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000025
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

In a records request, I requested clarification if containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were being either stored or accumulated. I also asked why container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were not on the record inventory sheet that was provided during the inspection if

these waste streams had been accepted into a storage dangerous waste management unit at the T-Plant. I received the below response to these questions:

Containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 are generated as TSD waste containers and are being managed in permitted storage. These waste streams are stored at 214-T before being transferred for final treatment, storage, and/or disposal as appropriate.

Refer to DOE/CHPRC Response to Item Number 11.

In my records request for item Number 11, I asked "Containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were labeled as hazardous waste and waste awaiting designation. When these containers were accepted into T-Plant for storage, was the waste acceptance process followed for SWOC acceptance criteria? If you followed this process, provide documentation used for container acceptance." I received the below response to this question.

T-Plant generates dangerous and/or mixed-waste while processing and/or maintenance activities. This waste material consists of items including, but not limited to: personal protective equipment, rags, and spent equipment contaminated with dangerous cleaning agents, lubricants, paints run-off or other dangerous materials that designate as dangerous waste when discarded. Operational Knowledge is used to characterize these waste materials for the purposes of waste designation. Waste generated by T-Plant is considered accepted at T-Plant when the waste is generated.

- 3) **WAC 173-303-400(3), referencing WAC 173-303-380, as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.**

WAC 173-303-380 Facility recordkeeping. (1) Operating record. The owner or operator of a facility must keep a written operating record at their facility. The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility:

(1)(a) A description of and the quantity of each dangerous waste received or managed on-site, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by subsection (2) of this section, recordkeeping instructions.

(1)(c) Records and results of waste analyses, waste determinations (as required by 40 C.F.R. Parts 264 and 265, Subpart CC), and trial tests required by WAC 173-303-300, General waste analysis, and by 40 C.F.R. sections 264.1034, 264.1063, 264.1083, 265.1034, 265.1063, 265.1084, 268.4(a), and 268.7. Note that data from laboratory analyses for 40 C.F.R. 268.4(a) and 268.7 must meet the requirements of WAC 173-303-110;

Observations: During the November 18, 2015 inspection of T-Plant, I observed container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were labeled and stored as Hazardous Waste at dangerous waste management unit 214-T at T-Plant. I observed that container numbers 221T-15-000023, 221T-15-000024, and 221T-15-000025 were marked as, "Waste Awaiting Designation." I observed that container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were not included on the current inventory of dangerous and mixed-waste stored at T-Plant that was provided to me during the inspection.

In a records request, I asked, as of the day of the inspection if there were any satellite accumulation areas or 90-day areas at T-Plant and I received the below response from CHPRC.

No, there are not any satellite accumulation areas (SAA) or 90 Day accumulation areas within the T-Plant Complex TSD boundary.

In a records request, I requested clarification if containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were either being stored or accumulated. I also asked why container numbers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were not on the record inventory sheet provided during the inspection if these waste streams had been accepted for storage into a dangerous waste management unit at the T-Plant. I received the below response to these questions:

Containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 are generated as TSD waste containers and are being managed in permitted storage. These waste streams are stored at 214-T before being transferred for final treatment, storage, and/or disposal as appropriate.

Refer to DOE/CHPRC Response to Item Number 11.

In my records request for item Number 11, I asked "Containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025 were labeled as hazardous waste and waste awaiting designation. When these containers were accepted into T-Plant for storage, was the waste acceptance process followed for SWOC acceptance criteria? If you followed this process, provide documentation used for container acceptance." I received the below response to this question.

T-Plant generates dangerous and/or mixed-waste while processing and/or maintenance activities. This waste material consists of items including, but not limited to: personal protective equipment, rags, and spent equipment contaminated with dangerous cleaning agents, lubricants, paints run-off or other dangerous materials that designate as dangerous waste when discarded. Operational Knowledge is used to characterize these waste materials for the purposes of waste designation. Waste generated by T-Plant is considered accepted at T-Plant when the waste is generated.

In a subsequent records request received by Ecology on April 28, 2016, I asked CHPRC to provide designation records for containers 0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025. I received the below response along with the following summarized

information provided to me from the Hanford Solid Waste Information and Tracking System (Dated April 19, 2016):

Note: These containers that have waste in them are awaiting waste analysis results so that proper waste designation can be performed by the Waste Management Representative.

- Container 0089852
 - Container contents: Paint and concrete debris
 - Accumulation Date: 10/05/2015
 - Source: 271T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-14-000020
 - Container Contents: Leaking alkaline batteries
 - Accumulation Date: 11/13/2014
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000023
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000024
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 10/15/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

- Container 221T-15-000025
 - Container Contents: Material Awaiting Designation
 - Accumulation Date: 9/22/2015
 - Source: 221T
 - RCRA Designated Date: Not documented (i.e. left blank)
 - TSD Received Date: Not documented (i.e. left blank)
 - TSD Accept Date: Not documented (i.e. left blank)

4) **WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.**

WAC 173-303-320(2)(d) The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken. The log or summary must be kept at the facility for at least five years from the date of inspection.

Observations: I observed the following instances where inspection logs did not comply with WAC 173-303-320(2)(d) requirements:

- I observed that the DO-040-001 Appendix A - T-Plant Complex Daily Surveillance Data Sheet inspection logs did not include the printed name of the inspector on the October 1, 2015, October 5, 2015, October 6, 2015, October 7, 2015, October 8, 2015, October 12, 2015, October 13, 2015, October 15, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, and October 28, 2015 inspection logs. Instead, I observed what appears to be the first and middle initial with the printed last name of the inspector on the inspection logs.
- I observed that the DO-040-001 Appendix B - T-Plant Complex Facility Closure Day Surveillance Data Sheet inspection logs did not include the printed name of the inspector on the October 2, 2015, October 3, 2015, October 4, 2015, October 23, 2015, October 24, 2015, October 25, 2015, October 30, 2015, and October 31, 2015 inspection records. Instead, I observed what appears to be the first initial and sometimes middle initial with the printed last name of the inspector on the inspection logs.
- I observed that the DO-040-001 Appendix C - T-Plant Complex Facility Exit Inspection Data Sheet inspection logs did not include the printed name of the inspector on the October 1, 2015, October 5, 2015, October 6, 2015, October 7, 2015, October 8, 2015, October 12, 2015, October 13, 2015, October 14, 2015, October 15, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, October 28, 2015, and October 29, 2015 inspection logs. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of the inspector on the inspection logs. I did not observe the time of the inspection on any of the inspection logs for the month of October 2015.
- I observed that the DO-040-020 Appendix A - 2706-T Daily Surveillance Data Sheet did not include the printed name of the inspector on the October 1, 2015, October 12, 2015, October 13, 2015, October 14, 2015, October 15, 2015, October 19, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, October 28, 2015, and October 29, 2015 inspection logs. Instead, I observed what appears to be the first initial and in some cases the middle initial with the printed last name of the inspector on the inspection logs.

- I observed that the DO-040-020 Appendix B - 2706-T Facility Closure Day Surveillance Data Sheet did not include the printed name of the inspector on the October 2, 2015, October 3, 2015, October 4, 2015, October 23, 2015, October 24, 2015, October 25, 2015, October 30, 2015, and October 31, 2015 inspection logs. Instead, I observed what appears to be the first initial and in some cases the middle initial with the printed last name of the inspector on the inspection logs.
- I observed that the DO-040-020 Appendix C - 2706-T Facility Exit Inspection Data Sheet did not include the printed name of the inspector on the October 1, 2015, October 12, 2015, October 13, 2015, October 14, 2015, October 15, 2015, October 19, 2015, October 20, 2015, October 21, 2015, October 22, 2015, October 26, 2015, October 27, 2015, October 28, 2015, and October 29, 2015 inspection logs. Instead, I observed what appears to be the first initial and in some cases the middle initial with the printed last name of the inspector on the inspection logs.
- I observed the DO-040-004 Appendix A - Portable Safety Shower/Eyewash Station Inspection Checklist in 214-T did not include the printed name of the inspector on the October 6, 2015, October 21, 2015, and October 28, 2015 inspection logs. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of the inspector on the inspection logs. I did not observe the time of the inspection on the October 14, 2015 inspection log.
- I observed the DO-040-004 Appendix G - Weekly Decon Shower Inspection Checklist did not include the printed name of the inspectors on the October 5, 2015, October 13, 2015, October 21, 2015 and October 29, 2015 inspection logs. Instead, I observed what appears to be the first initial and sometimes middle initial with the printed last name of the inspector on the inspection logs.
- I observed the DO-040-004 Appendix I - Weekly 2706-T Complex Fire System Pressure Check inspection logs did not include the printed name of the inspector on the October 1, 2015, October 14, 2015, October 19, 2015, and October 28, 2015 inspection logs. Instead, I observed what appears to be the first initial and sometimes middle initial with the printed last name of the inspector on the inspection logs.
- I observed the DO-040-016 Appendix A - T-Plant Weekly Waste Management Area Inspection Data Sheet did not include the printed name of the inspector on the October 5, 2015, October 6, 2015, October 12, 2015, October 13, 2015, October 26, 2015, and October 27, 2015 inspection logs. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of the inspector on the inspection logs.
- I observed the DO-040-004 Appendix B - Monthly Fire Extinguisher Inspection Checklist were conducted on October 5, 6, and 7, 2015, but I could not determine which fire extinguishers were inspected on specific dates. I did not observe the printed name of all the inspectors on the inspection log. Instead, I observed what appears to be the first and sometimes middle initial with the printed last name of two inspectors with one inspector putting their printed first and last name on the inspection log.
- I observed the DO-040-004 Appendix C - Monthly First Aid Kit/AED Emergency Medical Bag Inspection Checklist inspections were conducted on October 5, 2015 and October 7, 2015, but I could not determine from the inspection log, the date when specific equipment

was inspected. I did not observe the printed name by all of the inspectors on the inspection log. Instead, I observed what appears to be the first initial with the printed last name of the two inspectors on the inspection log.

- I observed the DO-040-004 Appendix D - Monthly Automatic Sprinkler System Inspection Checklist inspections were conducted on October 5, 2015 and October 13, 2015, but I could not determine which parts of the system were inspected on what dates. I did not observe the printed name of the inspectors on the inspection log. Instead, I observed what appears to be the first initial and in the other case, first and middle initial with the printed last name of two inspectors on the inspection log.
- I observed the DO-040-004 Appendix E - Monthly Emergency Response Cage Inspection Checklist conducted on October 5, 2015, did not contain the printed name of the inspector on the inspection log. Instead, I observed what appears to be the first initial with the printed last name of inspector on the inspection log.
- I observed the DO-040-004 Appendix F - Monthly Communication Equipment Inspection Checklist was conducted on October 5, 2015 and October 7, 2015, but I could not determine the date when particular equipment was inspected on the inspection log. I did not observe the printed name of the inspectors on the inspection log. Instead, I observed what appears to be the first initial with the printed last name of inspectors on the inspection log.

Action Required: Immediately upon receipt of this compliance report, USDOE-RL and CHPRC must include the printed name of inspectors and the date and time of the inspection on inspection logs. Within 60 days of receiving this compliance report, USDOE-RL and CHPRC must submit one week of T-Plant inspection records to Ecology showing a return to compliance with WAC 173-303-320(2)(d) requirements.

5) WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.

WAC 173-303-400(3)(c)(viii) "Subpart I use and management of containers." Section 265.174 is modified by replacing the paragraph with the following. "The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors."

40 CFR 265.174 Inspections. The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors.

Observations: I observed that DO-040-016 Appendix A – T-Plant Weekly Waste Management Area Inspection Data Sheet container inspections for HS-030 and HS-032 Storage Modules in 2706-T Yard were conducted on October 12, 2015 and October 20, 2015 (8 days).

Action Required: Immediately upon receipt of this report, USDOE-RL and CHPRC must perform dangerous waste container inspections at least weekly (at least once every seven days and not more than

6 calendar days between inspection dates). The inspection record must include notations of any leaking containers and deterioration of dangerous waste containers. Within sixty (60) days of receipt of this compliance report, USDOE-RL and CHPRC must submit to Ecology four weeks of DO-040-016 – Appendix A – T-Plant Weekly Waste Management Inspection Data Sheets (i.e. weekly dangerous waste container inspections).

Areas of Concern

- 1) WAC 173-303-573(22)(b) states the following:

A large quantity handler of universal waste may accumulate universal waste for longer than one year from the date the universal waste is generated, or received from another handler if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that such activity was solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal.;

During the inspection at the 214-T Building, I observed numerous containers of universal waste, many of them with dates within weeks of having been accumulated for a year's period. At Hanford, universal waste is transferred or shipped to the Centralized Consolidation and Recycling Center (CCRC). When universal waste is held for close to the required one-year period at the generating facility, it leaves the CCRC with little time to prepare universal waste containers for shipment. This puts CCRC at risk in meeting the yearly accumulation time limitations if they cannot prove that the waste was held solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal.

- 2) A closing unauthorized dangerous waste management unit that previously held a dangerous or mixed-waste should not be used for storage even of non-dangerous waste materials until final closure is complete regardless if there were no spills, etc. The final approved closure plan and process may require sampling to demonstrate that the dangerous waste management unit met clean closure performance standards and that the areas are safe for non-dangerous waste storage.

The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, sex, marital status, disabled veteran's status, Vietnam Era veteran's status, or sexual orientation. If you have special accommodation needs or require this document in alternative format, please contact Jared Mathey at (509) 372-7949 (Voice) or use the Washington State Relay operator by dialing either 711 or 1-800-833-6388 (TTY).

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T-Plant Complex
RCRA Site ID: WA7890008967
Inspection Date: November 18, 2015

Addendum A

November 18, 2015 – T-Plant Dangerous Waste Storage Inventory

CURRENT T PLANT INVENTORY OF DANGEROUS AND MIXED WASTE

in line
 ↓

ID Number	DWMU (LOCATION)	WASTE DESCRIPTION	TSD ACCEPT DATE	DANGEROUS WASTE CODES	TREATABILITY GROUP	LDR WASTE STREAM	CONTAINER/TANK VOLUME (m3)	CONTAINER/TANK SIZE (M OR GALLONS)	GROSS WGT (KG)	WASTE TYPE
221T-96-000009	221T-CD	BOX CONTAINS PUREX "D" CELL JUMPER (16-R)	2/28/1996	D004 D005 D006 D007 D008 D009 D010 D011	RH-BX-LG	RH-TRU/M IN GREATER THAN 1.8M3 BOXES	8.67	3 x 8.5 x 12	1383.4	RH-TRUM
TK6-1	221T-CD	LIQUIDS AND SLUDGE CONTAINING GREASE AND OIL FROM DECONTAMINATION ACTIVITIES. ESTIMATED .33 CUBIC METERS IN TANK HEEL. RIS 4/23/15	6/3/1999	D005 D006 D007 D008 F001 F002 F003 F004 F005	MLLW-03	Organic Non-Debris (Thermal)	55	14500 GALLON	238	CH-MLLW
TK15-1	221T-CD	LIQUIDS AND SLUDGE CONTAINING GREASE AND OIL FROM DECONTAMINATION ACTIVITIES. TANK HEEL ESTIMATED AS .33 CUBIC METERS. RIS 4/23/15	6/3/1999	D005 D006 D007 D008 F001 F002 F003 F004 F005	MLLW-03	Organic Non-Debris (Thermal)	53	14000 GALLON	238	CH-MLLW
TK5-7	221T-CD	LIQUIDS AND SLUDGE CONTAINING GREASE AND OIL FROM DECONTAMINATION ACTIVITIES. TANK HEEL ESTIMATED AS .38 CUBIC METERS. RIS 4/23/15	6/3/1999	D005 D006 D007 D008 F001 F002 F003 F004 F005	MLLW-03	Organic Non-Debris (Thermal)	60.5	16000 GALLON	274	CH-MLLW
TK11-R	221T-CD	LIQUIDS AND SLUDGE CONTAINING GREASE AND OIL FROM DECONTAMINATION ACTIVITIES. TANK HEEL ESTIMATED AS .33 CUBIC METERS. RIS 4/23/15.33	6/3/1999	D005 D006 D007 D008 F001 F002 F003 F004 F005	MLLW-03	Organic Non-Debris (Thermal)	53	14000 GALLON	238	CH-MLLW
0022097	2706T-PAD	DISCARDED STAINLESS STEEL GLOVEBOX FROM THE 2322 BUILDING (GBM: 232ABC).	8/5/2005	D008	MLLW-05	Radioactive Lead Solids	35.4	1250 CU FT	12213	CH-TRUM
0047674	2706T-YRD	<MW> OVERPACK OF 221T-02-000087. TANK 11L SAMPLE RETURNS.	11/4/2002	D002 D006 D007 D008 D010 F001 F002 F003 F004 F005	MLLW-07	M-91 Waste (RH and Large Container MLLW)	0.32	85 GALLON	130.6	RH-MLLW
TK5-9	221T-CD	LIQUIDS AND SLUDGE CONTAINING GREASE AND OIL FROM DECONTAMINATION ACTIVITIES. ESTIMATED .18 CUBIC METERS, TANK HEEL. RIS 4/23/15	6/3/1999	D005 D006 D007 D008 F001 F002 F003 F004 F005	MLLW-03	Organic Non-Debris (Thermal)	18.2	4800 GALLON	130	CH-MLLW
TK5-6	221T-CD	LIQUIDS AND SLUDGE CONTAINING GREASE AND OIL FROM DECONTAMINATION ACTIVITIES. TANK HEEL ESTIMATED AT .18 CUBIC METERS. RIS 4/23/15	6/3/1999	D005 D006 D007 D008 F001 F002 F003 F004 F005	MLLW-03	Organic Non-Debris (Thermal)	19.3	5100 GALLON	130	CH-MLLW
0071866	221T-HE	ABSORBED OIL FROM CANYON CRANE	11/10/2015	WT02			0.208	55 GALLON	106	
0073727	221T-HE	ABSORBED OIL FROM CANYON CRANE	11/10/2015	WT02			0.208	55 GALLON	55	
0073764	221T-HE	ABSORBED OIL FROM CANYON CRANE	11/10/2015	WT02			0.208	55 GALLON	111.1	
0074753	221T-HE	ABSORBED OIL FROM CANYON CRANE	11/10/2015	WT02			0.208	55 GALLON	120.2	
0074786	221T-HE	ABSORBED OIL FROM CANYON CRANE	11/10/2015	WT02			0.208	55 GALLON	125	

Addendum B

Waste Container Datasheets for Container Numbers

0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025

Waste Container Data Sheet Administration

Published Date: 10/20/11

Effective Date: 10/20/11

Appendix A - Container Inventory Sheet - Drum or Box

Primary ID # or CIN: 0089852
 Secondary ID #: _____

CONTAINER INFORMATION		Type/Vent
Container Type: <u>UN1A2</u>		<u>2A</u>
Container Size: <u>10 gal</u>		S/N: _____

WASTE INFORMATION		Accumulation Start Date:
Waste Type (MW, LLW, <u>Haz</u> and Stream): _____	<u>HW 214T</u>	<u>10/5/15</u>
Location: _____		

CLOSURE INFORMATION		Date Closed:
Signature at right certifies that this container contains only the waste item(s) or material listed on this inventory, and has been packaged per ECOMMR direction.		_____
Gross Weight:		_____
Layers of Confinement		_____
Waste Compliance Team Lead:		_____

DOSE RATE INFORMATION			RCT Printed Name:
Dose on contact: _____	mrem/hr		_____
Dose @ 30 cm: _____	mrem/hr		RCT Signature: _____
RC initials: _____			Date: _____

DATE	Specific waste description (waste type, manufacturer's name, etc.) or liner number. And waste composition by volume percent (liquid, solid, wood, metal, plastic, etc.)	Estimated Weight	MSDS #	Operator Initials
10/5/15	Box/Drum Liner (specify): <u>B-4mil plastic</u>	<u>2 LB.</u>		<u>RRE</u>
10/5/15	Absorbent (specify): <u>1 NRP pad</u>	<u>1 LB.</u>		<u>RRE</u>
10/5/15	<u>10 Lbs. concrete dust / paint</u>	<u>10 LB.</u>	<u>MT</u>	<u>RRE</u>
11/10/15	<u>5 lbs. Paint chips / grant</u>	<u>5 lbs</u>	<u>MT</u>	<u>B</u>

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Universal Waste/Recycle Material Handling and Packaging

Published Date: 08/06/14

PRC-PRO-OP-52525

Effective Date: 08/07/14

Appendix B - Universal Waste/Recycle Material Container Inventory Sheet

Primary ID # or CIN: 221T-14-000020 Facility: T Plant / 214T Accumulation Start Date: 11/13/14
Container Type: 1.35^{gal} plastic bucket Container Size: 1.35 gal
Liner Type: _____ Tare Weight: _____
Date Closed: _____ Gross Weight: _____
Operations Supervisor Print: _____ Sign: _____ Date: _____

Signature certifies that this container contains only the waste item(s) or material listed on this inventory and has been packaged compliantly.

WASTE / MATERIAL TYPE (CHECK ONE):

<input type="checkbox"/>	Lamps. List Type:
<input checked="" type="checkbox"/>	Batteries and/or Ballasts/Capacitors with Batteries. List Type: <u>Alkaline - Leaking</u>
<input type="checkbox"/>	Mercury Containing Equipment.
<input type="checkbox"/>	Electrical Ballast and Capacitors (without batteries).
<input type="checkbox"/>	Recycle Material. List Type:

Waste Container Data Sheet Administration

Published Date: 10/20/11

Effective Date: 10/20/11

Appendix A - Container Inventory Sheet - Drum or Box

Primary ID # or CIN: 221T-15-000023
 Secondary ID #: NA

CONTAINER INFORMATION		Type/Vent
Container Type: <u>UN1H</u>		<u>NA</u>
Container Size: <u>5 gal. Plastic</u>		

WASTE INFORMATION		Accumulation Start Date:
Waste Type (MW, LLW, Haz and Stream): <u>214T waste awaiting designation</u>		<u>9/22/15</u>
Location:		

CLOSURE INFORMATION	Date Closed:
Signature at right certifies that this container contains only the waste item(s) or material listed on this inventory, and has been packaged per ECO/WMR direction.	
	Gross Weight:
	Layers of Confinement:
	Waste Compliance Team Lead:

DOSE RATE INFORMATION		
Dose on contact:	mrem/hr	RCT Printed Name:
Dose @ 30 cm:	mrem/hr	RCT Signature:
RC Initials:		Date:

DATE	Specific waste description (waste type, manufacturer's name, etc.) or liner number. And waste composition by volume percent (liquid, solid, wood, metal, plastic, etc.)	Estimated Weight	MSDB #	Operator Initials
<u>4/22/15</u>	Box/Drum Liner (specify): <u>2 mil plastic</u>			<u>RRS</u>
<u>NA</u>	Absorbent (specify):	<u>NA</u>		<u>NA</u>
<u>9/22/15</u>	<u>Shell Alumina Grease</u>		<u>0250478</u>	<u>RRS</u>
<u>9/22/15</u>	<u>CS4 Silicane</u>		<u>19971</u>	<u>RRS</u>

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Waste Container Data Sheet Administration

Published Date: 10/20/11

Effective Date: 10/20/11

Appendix A - Container Inventory Sheet - Drum or Box

Primary ID # or CIN: 221T-15-000024
 Secondary ID #: NA

CONTAINER INFORMATION
 Container Type: SOIL HD Type/Vent: NA
 Container Size: 5 gal. plastic SN: NA

WASTE INFORMATION
 Waste Type (MW, DLW, Haz and Stream): NA
 Location: 221T date awaiting disposal on accumulation start date: 10/15/15

CLOSURE INFORMATION
 Signature at right certifies that this container contains only the waste listed on this inventory, and has been packaged per ECOMMR direction.
 Date Closed: _____
 Gross Weight: _____
 Layers of Containment: _____
 Waste Compliance Team Lead: _____

DOSE RATE INFORMATION
 Dose on contact: _____ member
 Dose @ 30 cm: _____ member
 RC Initials: _____ RCT Printed Name: _____
 RCT Signature: _____ Date: _____

DATE	Specific waste description (waste type, manufacturer's name, etc.) or drum number and waste composition by volume: per cent (liquid, solid, wood, metal, plastic, etc.)	Estimated Weight	MSDS #	Container Initials
10/15/15	Box/Drum Liner (specify): <u>5 gal. plastic</u>	<u>22 LB</u>	<u>NA</u>	<u>RC</u>
NA	Absorbent (specify): <u>NA</u>	<u>NA</u>	<u>NA</u>	<u>RC</u>
10/15/15	<u>2 - Alkaline D batteries & 2 Alkaline 9V batteries</u>	<u>2 LB</u>	<u>020153C</u>	<u>RC</u>
10/15/15	<u>1 - Alkaline 2 Volt battery</u>	<u>2 LB</u>	<u>020153A</u>	<u>RC</u>

Before each use, ensure this copy is the most current version.

Waste Container Data Sheet Administration
 Published Date: 10/20/2011 TPLN-PRO-WM-81787 Effective Date: 10/20/2011

Appendix A - Container Inventory Sheet - Drum or Box

Primary ID # or CIN: 221T-15-000025
 Secondary ID #:

CONTAINER INFORMATION
 Container Type: UNHAZ Type/Vent: NA
 Container Size: 135 gal S/N: NA

WASTE INFORMATION
 Waste Type (MW, LLW, Haz and Stream): HAZ
 Location: 214T Date awaiting disposition Accumulation Start Date: 6-22-15

CLOSURE INFORMATION
 Signature at right certifies that this container contains only the waste item(s) or material listed on this inventory, and has been packaged per ECOWHM direction.
 Date Closed: _____ Gross Weight: _____
 Layers of Containment: _____ Waste Compliance Team Lead: _____

DOSE RATE INFORMATION
 Dose on contact: _____ member
 Dose @ 30 cm: _____ member
 RC Initials: _____ RCT Printed Name: _____
 RCT Signature: _____ Date: _____

DATE	Specific Waste Description (Waste Type, MW, LLW, Haz, etc.) or the number and waste item(s) listed on this inventory, and has been packaged per ECOWHM direction.	Container Type	Container Size	Location	Accumulation Start Date	Signature
11/17/15	Box/Drum Liner (specify): <u>4 ml plastic</u>					
NA	Absorbent (specify): <u>1-WD-40 12oz cans empty not packaged</u>					
11/17/15						

Before each use, ensure this copy is the most current version. Administrative Use

Addendum C

SWIR310 Reports (Dated April 19, 2016) for Container Numbers
0089852, 221T-14-000020, 221T-15-000023, 221T-15-000024, and 221T-15-000025

T-Plant Complex
RCRA Site ID: WA7890008967
Inspection Date: November 18, 2015

Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 0089852
Source Facility:
Location Facility:
Shipment #:

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Package ID: 0089852	Secondary Pkg ID:	Accumulation Date: 10/05/2015
Waste Type: D NON	Phys State Cd:	Deadline Date: 01/03/2016
Sec Waste Type: NON	UHC Determination:	Ship Date:
Encasement/HICH:	UHC's Applicable:	TSD Receive Date:
Profile / Rev#: -	NFPA < 93.3C:	TSD Accept Date:
NSRD / Rev #: -	Storage Category:	Disposal Date:
CCP Control?:		

Container Type / Descr: DM / 10 GALLON	Container Empty Tare Wt. (kg): 6.8200
Container Volume (cu. meters): 0.0379	Waste Weight (kg):
Labpack Flag: N	Container Gross Wt. (kg):
Container Contents: PAINT AND CONCRETE DEBRIS, D005,D008	
SWO Comments:	

Generator Information

Generating Company: CHPRC CHEM PLATEAU REMEDIATION CO.
Source Facility: 271T
Generator Comments: WORK PACKAGE 27-15-01611

Generator ID: 0061986 Generator Group: TETVAC
Generator: LA JOHNSON

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T-Plant Complex
RCRA Site ID: WA7890008967
Inspection Date: November 18, 2015

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Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 0089852
Source Facility:
Location Facility:
Shipment #:

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Hazardous Package Detail

Container Status: Flashpoint: pH Value: Subpart CC Flag:
DN Numbers:

RCRA Reporting

ADMR Stream Description:
Designation Code:
Source Code:
Comment:
Form Code:
Comment:
Origin Code:
Residual Mgmt Method:
Comment:
Management Method:
Comment:
Certification Group:
Reportable CERCLA?

Pre-2007 Reporting

Waste Stream: Offsite TSD Waste Stream: RCRA Designated Date:

PCB Package Detail:

PCB Type: PCB Source Concentration (PPM):
PCB Subtype: PCB Waste Weight (kg):
PCB Contents: Removed from Service:

Solid Waste Information and Tracking System
 Container Listing Report
 for Package ID: 0089852
 Source Facility:
 Location Facility:
 Shipment #:

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Radioactive Package Detail

Waste Category:	ana Waste?:	Thermal Power (w/cu.ft.):
Combustible Flag:	Shielding:	Neutron Dose Rate (mrem/hr):
Exceeds ESB Limit:	Handling:	Contact Dose Rate (mrem/hr):
KRC Class:	RSWINS Container Cnt:	Tot Pa-Ci:
	Excluded from DE-Ci:	ICRP 71 DE-Ci:

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date:	VOC Hold?:	VOC Resample Date:
----------------------------	------------	--------------------

Current Location Information

Facility ID: 214T	Tier Level:	Loc Beg Coordinates - N:
Trench / Unit:	Tier Position:	W:
Module:	GPS Data Flag:	Loc End Coordinates - N:
		W:

Location History

<u>Location Date</u>	<u>Facility ID</u>	<u>Unit</u>	<u>Module</u>	<u>Tier Level</u>	<u>Tier Posn</u>	<u>Outermost Pkg ID</u>
10/05/2015	214T					
	221T	R5				

Solid Waste Information and Tracking System
Container Listing Report
For Package ID: 221T-14-000020
Source Facility:
Location Facility:
Shipment #:

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Package ID: 221T-14-000020 Secondary Pkg ID:
Waste Type: D NON Dye Scale Cd:
Sec Waste Type: NON UHC Determination:
Encasement/HIC#: HIC's Applicable:
Profile / Rev#: NPPA < 93.3C
WHD / Rev #: Storage Category:
CCP Control?:

Accumulation Date: 11/13/2014
Deadline Date: 02/11/2015
Slip Date:
TSD Receive Date:
TSD Accept Date:
Disposal Date:

Container Type / Descr: PC / 1.25 GALLON Container Empty Tare Wt. (kg):
Container Volume (cl. meters): 0.0047 Waste Weight (kg):
Labpack Flag: X Container Gross Wt. (kg):
Container Contents: TAKING AIRLINE BATTERIES
SNO Comments:

Generator Information
Generating Company: CEMEX GRAN PLANTAD REMEDIATION CO. Generator ID: 0001522 Generator Group: TETVAC
Source Facility: 221T Generator: PA KERRON
Generator Comments:

Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 221T-14-000020
Source Facility:
Location Facility:
Shipment #:

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Hazardous Package Detail

Container Status: Flashpoint: pH Value: Subpart CC Flag:
DW Numbers:

RCRA Reporting

ADWR Stream Description:
Designation Code:
Source Code:
Comment:
Form Code:
Comment:
Origin Code:
Residual Mgmt Method:
Comment:
Management Method:
Comment:
Certification Group:
Reportable CERCLA?:

Pre-2007 Reporting

Waste Stream: Offsite TSD Waste Stream: RCRA-Designated Date:

PCB Package Detail:

PCB Type: PCB Source Concentration (PPM):
PCB Subtype: PCB Waste Weight (kg):
PCB Contents: Removed from Service:

T-Plant Complex
 RCRA Site ID: WA7890008967
 Inspection Date: November 18, 2015

Solid Waste Information and Tracking System
 Container Listing Report
 for Package ID: 221T-14-000020
 Source Facility:
 Location Facility:
 Shipment #:

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Radioactive Package Detail

Waste Category:	SEM Waste?:	Thermal Power (w/cu.m.):
Combustible Flag:	Shielding:	Neutron Dose Rate (mrem/hr):
Exceeds ISB Limit:	Handling:	Contact Dose Rate (mrem/hr):
NRC Class:	RSTMS Container Cnt:	Tot Pe-Ci:
	Excluded from DE-Ci:	ICRP 71 DE-Ci:

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date:	VOC Hold?:	VOC Resample Date:
----------------------------	------------	--------------------

Current Location Information

Facility ID: 214T	Tier Level:	Loc Beg Coordinates - N:
Trench / Unit:	Tier Posit Lon:	W:
Module:	GFS Data Flag:	Loc End Coordinates - N:
		W:

Location History

<u>Location Date</u>	<u>Facility ID</u>	<u>Unit</u>	<u>Module</u>	<u>Tier Level</u>	<u>Tier Posn</u>	<u>Outermost Pkg ID</u>
12/02/2014	214T					

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T-Plant Complex
RCRA Site ID: WA7890008967
Inspection Date: November 18, 2015

Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 221T-15-000023
Source Facility:
Location Facility:
Shipment #:

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Package ID: 221T-15-000023
Waste Type: D LLW
Sec Waste Type: LLW
Encasement/HIC#: -
Profile / Rev#: -
MSRD / Rev #: -
CCP Control?:

Secondary Pkg ID:
EPA State Cd:
DRC Determination:
UNC's Applicable:
NFPA: < 93.3C:
Storage Category:

Accumulation Date: 09/22/2015
Deadline Date: 12/21/2015
Ship Date:
TSD Receive Date:
TSD Accept Date:
Disposal Date:

Container Type / Descr: FC / 6.5 GALLON
Container Volume (cu. meters): 0.0290
Labpack Flag: N
Container Contents: MATERIAL AWAITING DESIGNATION
SWO Comments:

Container Empty Tare Wt. (kg):
Waste Weight (kg):
Container Gross Wt. (kg):

Generator Information

Generating Company: CEPRC CHEM PLATEAU REMEDIATION CO.
Source Facility: 221T
Generator Comments:

Generator ID: 0098695 Generator Group: TBTAC
Generator: RR EVERHAM

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Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 221T-15-000023
Source Facility:
Location Facility:
Shipment #:

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Hazardous Package Detail:

Container Status:
DN Numbers:

Placard:

pH Value:

Support CC Flag:

RCRA Reporting

AWM Stream Description:

Designation Code:

Source Code:

Comment:

Form Code:

Comment:

Origin Code:

Residual Mgmt Method:

Comment:

Management Method:

Comment:

Certification Group:

Reportable CERCLA?:

Pre-2007 Reporting

Waste Stream:

Offsite TSD Waste Stream:

RCRA Designated Data:

PCB Package Details:

PCB Type:

PCB Subtype:

PCB Contents:

PCB Source Concentration (PPM):

PCB Waste Weight (kg):

Removed from service:

Solid Waste Information and Tracking System
 Container Listing Report
 for Package ID: 221T-15-000023
 Source Facility:
 Location Facility:
 Shipment #:

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Radioactive Package Detail

Waste Category: WCI	Spill Status:	Thermal Power (w/ci.m.):	.00000E+00
Combinable Flag:	Shielding:	Neutron Dose Rate (micro/hr):	
Exceeds ISL Limit: N	Handling:	Contact Dose Rate (micro/hr):	.00000E+00
RC Class: A	MSWM Container Cat: 1	Tot Pw-Ci:	
	Excluded from DE-CI:	ICRP 71 DE-CI:	.00000E+00

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date: VOC Hold? VOC Resamp]e Date:

Current Location Information

Facility TR: 214T	Tier Level:	Loc Beg Coordinates - N:	
Wrench / ULLC: BAY	Tier Position:	W:	
Module:	GPS Data Flag:	Loc End Coordinates - N:	
		W:	

Location History

<u>Location Date</u>	<u>Facility ID</u>	<u>Date</u>	<u>Module</u>	<u>Tier Level</u>	<u>Tier Posn</u>	<u>Container Eqs ID</u>
11/23/2015	214T	BAY				

Solid Waste Information and Tracking System
Container Listing Report
For Package ID: 221T-15-000024
Source Facility:
Location Facility:
Shipment #:

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Package ID: 221T-15-000024 Secondary Pkg ID:
Waste Type: D ILM Phys State Cd:
Sec Waste Type: ILM URS Determination:
Encasement/HTCF: URS's Applicable:
Profile / Rev#: MFLA < 93.3C:
MSRD / Rev #: Storage Category:
CTP Control?:

Container Type / Descr: DC / 5 GALLON Container Empty Tare Wt. (kg):
Container Volume (cu. meters): 0.0190 Waste Net/Gr (kg):
Leakage Flag: N Container Gross Wt. (kg):
Container Contents: MATERIAL HANDLING DESIGNATION
SWC Comments:

Generator Information
Generating Company: CEREC CH2M PLATINUM MINING/ATION CO. Generator ID: 0098695 Generator Group: TTYVAC
Source Facility: 221T Generator: RR EVERMAN
Generator Comments:

Accumulation Date: 10/15/2015
Deadline Date: 01/13/2016
Ship Date:
TSD Receive Date:
TSD Accept Date:
Disposal Date:

Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 221R-IS-000024
Source Facility:
Location Facility:
Shipment #:

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Hazardous Package Detail

Container Status:

DR Numbers:

RCRA Reporting

ADR# Stream Description:

Designation Code:

Source Code:

Comment:

Form Code:

Comments:

Origin Code:

Residual Mgmt Method:

Comment:

Management Method:

Comment:

Certification Group:

Reportable Character:

Pre-2007 Reporting

Waste Stream:

Offsite TSD Waste Stream:

RCRA Designated Date:

MapPoint:

pH Value:

Subpart C/C P14G:

PCB Type:
PCB Subtype:
PCB Contents:

PCB Source Concentration (ppm):
PCB Waste Weight (kg):
Removed from Service:

T-Plant Complex
 RCRA Site ID: WA7890008967
 Inspection Date: November 18, 2015

Solid Waste Information and Tracking System
 Container Listing Report
 for Package ID: 221T-15-000024
 Source Facility:
 Location Facility:
 Shipment #:

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Radioactive Package Detail

Waste Category: WCL	Ism Waste?:	Thermal Power (w/cu.ft.):	.00000E+00
Combustible Flag:	Shielding:	Neutron Dose Rate (mrem/hr):	
Exceeds ISB Limit: N	Handling:	Contact Dose Rate (mrem/hr):	
NRC Class: A	MSWIMS Container Cnt: 1	Tot Re-Ci:	.00000E+00
	Excluded from DE-Ci:	ICRP 71 DE-Ci:	.00000E+00

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date: VOC Hold?: VOC Resample Date:

Current Location Information

Facility ID: 214T	Tier Level:	Loc Beg Coordinates - N:
Trench / Unit: BAY	Tier Position:	W:
Module:	GPS Data Flag:	Loc End Coordinates - N:
		W:

Location History

<u>Location Date</u>	<u>Facility ID</u>	<u>Unit</u>	<u>Module</u>	<u>Tier Level</u>	<u>Tier Posn</u>	<u>Outermost Pkg ID</u>
11/23/2015	214T	BAY				

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T-Plant Complex
RCRA Site ID: WA7890008967
Inspection Date: November 18, 2015

Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 221T-15-000025
Source Facility:
Location Facility:
Shipment #:

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Package ID: 221T-15-000025 Secondary Pkg ID:
Waste Type: D LLW Phys State Cd:
Sec Waste Type: LLW UHC Determination:
Encasement/HIC#: UHC's Applicable:
Profile / Rev#: - NFPA < 93.3C:
NSRD / Rev #: - Storage Category:
CCP Control?:

Accumulation Date: 05/22/2015
Deadline Date: 12/21/2015
Ship Date:
TSD Receive Date:
TSD Accept Date:
Disposal Date:

Container Type / Descr: PG / 1.3 GALLON
Container Volume (cu. meters): 0.0049
Labpack Flag: N
Container Contents: MATERIAL AWAITING DESIGNATION
SNO Comments:

Container Empty Tare Wt. (kg):
Waste Weight (kg):
Container Gross Wt. (kg):

Generator Information

Generating Company: CHPRC CHEM PLATEAU REMEDIATION CO.
Source Facility: 221T
Generator Comments:

Generator ID: 6098695 Generator Group: TETFAC
Generator: ER EVERMAN

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T-Plant Complex
RCRA Site ID: WA7890008967
Inspection Date: November 18, 2015

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Solid Waste Information and Tracking System
Container Listing Report
for Package ID: 221T-15-000025
Source Facility:
Location Facility:
Shipment #:

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Hazardous Package Detail

Container Status: Flashpoint: pH Value: Subpart CC Flag:
DW Numbers:

RCRA Reporting

ADWR Stream Description:
Designation Code:
Source Code:
Comment:
Form Code:
Comment:
Origin Code:
Residual Mgmt Method:
Comment:
Management Method:
Comment:
Certification Group:
Reportable CERCLA?

Pre-2007 Reporting

Waste Stream: Offsite TSD Waste Stream: RCRA Designated Date:

PCB Package Detail:

PCB Type: PCB Source Concentration (PPM):
PCB Subtype: PCB Waste Weight (kg):
PCB Contents: Removed from Service:

T-Plant Complex
 RCRA Site ID: WA7890008967
 Inspection Date: November 18, 2015

Solid Waste Information and Tracking System
 Container Listing Report
 for Package ID: 221T-15-000025
 Source Facility:
 Location Facility:
 Shipment #:

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Radioactive Package Detail

Waste Category: WCL	ann Waste?:	Thermal Power (w/cu.m.):	.00000E+00
Combustible Flag:	Shielding:	Neutron Dose Rate (mrem/hr):	
Exceeds TSB Limit: N	Handling:	Contact Dose Rate (mrem/hr):	
NRC Class: A	RSWMS Container Cnt: 1	Tot Pa-Ci:	.00000E+00
	Excluded from DE-Ci:	ICRP 71 DE-Ci:	.00000E+00

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date:	VOC Hold?:	VOC Resample Date:
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Current Location Information

Facility ID: 214T	Tier Level:	Loc Beg Coordinates - N:
Trench / Unit: BAY	Tier Position:	W:
Module:	GPS Data Flag:	Loc End Coordinates - N:
		W:

Location History

<u>Location Date</u>	<u>Facility ID</u>	<u>Unit</u>	<u>Module</u>	<u>Tier Level</u>	<u>Tier Posn</u>	<u>Outermost Pkg ID</u>
11/23/2015	214T	BAY				

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