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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
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December 1, 2015

15-NWP-205

By certified mail

Ms. Stacy Charboneau, 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 June 30, 2015 for the Hanford Site 241-CX Tank System, Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.540

Dear Ms. Charboneau and Mr. Ciucci:

Thank you for your staff's time during the Department of Ecology's (Ecology) non-financial records review (NRR) compliance inspection. The purpose of our NRR was to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 Washington Administrative Code) for the 241-CX Tank System. These regulations establish a system for safe and responsible management of dangerous waste.

Ecology's compliance report for the 241-CX Tank System inspection is enclosed. This report cites one area not in compliance with the Dangerous Waste Regulations and three areas of concern. The area of non-compliance and the actions required for a return to compliance are listed in the Compliance Problems section of the report.

To return to compliance, complete the actions required and respond to Ecology within the specified timeframes in the Compliance Problems section of the report. Include all supporting documentation such as photographs, records, and statements explaining the actions taken and dates completed to return to compliance. Submit the above paperwork along with any requested documentation, to Edward Holbrook 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.



Ms. Charboneau and Mr. Ciucci
December 1, 2015
Page 2 of 2

15-NWP-205
241-CX Tank System
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 15.540
Inspection Date: June 30, 2015

If you have questions or need further information, please contact me at (509) 372-7909 or edward.holbrook@ecy.wa.gov.

Sincerely,



Edward Holbrook
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tkb

Enclosure

cc electronic w/enc:

- Dave Bartus, EPA
- Jack Boller, EPA
- Dennis Faulk, EPA
- Cliff Clark, USDOE
- Tony McKarns, USDOE
- Joel Williams, Jr., CHPRC
- Jon Perry, MSA
- Ken Niles, ODOE
- Debra Alexander, Ecology
- Kathy Conaway, Ecology
- Kelly Elsethagen, Ecology
- Jane Hedges, Ecology
- Jared Mathey, Ecology
- John Price, Ecology
- Stephanie Schleif, Ecology
- Ron Skinnarland, Ecology
- Environmental Portal
- Hanford Facility Operating Record

cc w/enc:

- Steve Hudson, HAB
- Administrative Record
- CHPRC Correspondence Control
- NWP Central File
- NWP Compliance Index File: 15.540

cc w/o enc:

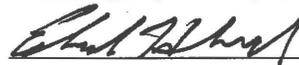
- Rod Skeen, CTUIR
- Gabriel Bohnee, NPT
- Russell, Jim, YN
- NWP Reader File

**Washington Department of Ecology
Nuclear Waste Program
Compliance Report**

Site: 241-CX Tank System
RCRA Site ID: WA7890008967
Inspection Date: June 30, 2015
Site Contacts: Joel F. Williams Jr., CH2M Hill Plateau Remediation Company (CHPRC)
Tony McKarns, United States Department of Energy (USDOE)
Phone: (509) 376-4782 – Joel Williams Jr.
FAX: (509) 372-2828 – Joel Williams Jr.
Site Location: Hanford Site
Benton County, WA
At This Site Since: 1943 NAICS#: 54171, 56221, and 924110
Current Site Status: Treatment, Storage, and Disposal Facility / Closure Unit 15
Compliance Index #: 15.540

Ecology

Lead Contact: Edward Holbrook Phone: (509) 372-7909 FAX: (509) 372-7971
Other Representatives: N/A
Report Date: December 1, 2015
Report By: Edward Holbrook


(Signed)

12/1/15
(Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource Conservation and Recovery Act of 1976 (RCRA) facility, even though the Hanford Site contains numerous processing areas spread over a large geographic area. The Hanford Site is approximately a 586 square mile tract of land located in Benton County, Washington. It is divided into a number of dangerous waste management units (DWMUs) that are administratively organized into "unit groups." A unit group may contain only one DWMU or many. Currently, there are 37 unit groups at the Hanford Site. Individual DWMUs use only a few small portions of the Hanford Site. Additional descriptive information on the individual DWMUs is contained in unit group permit applications and in Parts III, V, and VI of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, WA78900008967, Revision 8C*, (hereafter referred to as the Permit).

Owner/Operator Information

The United States Department of Energy (USDOE) is the owner and operator of the 241-CX Tank System and oversees waste management and cleanup activities ongoing at the Hanford Site. CHPRC is contracted by the USDOE to co-operate the 241-CX Tank System.

Facility Background

According to the 241-CX Tank System Permit Application Part A Form, Revision 6, dated October 1, 2008, the tank system is located east of Building 209-E in the 200 East Area of the Hanford Site. The 241-CX Tank System consists of three tanks. The history and processes associated with the tanks are as follows.

Tank 241-CX-70: This tank has a design capacity of 30,000 gallons. The EPA waste codes associated with the mixed waste (MW) in the tank are D002 and D007. The waste also carries the state-only toxic dangerous waste code, WT02. The annual quantity of waste that was treated and stored in Tank 241-CX-70 was approximately 19,000 pounds.

Tank 241-CX-70 was used for approximately one year in the early 1950's, to store radioactive process waste from the reduction and oxidation (REDOX) pilot studies. The REDOX Facility was used for separating plutonium and uranium from irradiated reactor fuel. Waste removal activities for Tank 241-CX-70 were initiated in 1987 with the construction of a sluicing and pumping system. The system involved using large volumes of water to sluice and pump the solid MW from Tank 241-CX-70 to the Double-Shell Tank System. Approximately 140,000 gallons of water were used to sluice the original waste volume of 10,300 gallons down to 750 gallons. The remaining 750 gallons were kept in Tank 241-CX-70 until December 20, 1991, at which time the waste was placed in containers and transferred to the 224-T Transuranic Waste Storage and Assay Facility.

Tank 241-CX-71: This tank has a design capacity of 1,000 gallons. The waste code associated with the MW in the tank is the state-only toxic dangerous waste code, WT02. The annual quantity of waste that was treated and stored in Tank 241-CX-71 was approximately 33,400 pounds.

Tank 241-CX-71 was used from 1952 through 1957 for neutralizing the 201-C process condensate and the coil and condenser cooling water. The waste was neutralized by contacting a bed of limestone aggregate placed in the tank. After a decontamination flush in June 1957, Tank 241-CX-71 was placed out of service.

Tank 241-CX-72: This tank has a design capacity of 2,340 gallons. The EPA waste codes associated with the MW in the tank are D002, D004 through D011. The waste also carries the state-only toxic dangerous waste codes, WT01 and WT02. There is also the possibility that decontamination flushes from the Strontium Semiworks Complex were transferred to Tank 241-CX-72. The annual quantity of waste that was treated and stored in Tank 241-CX-72 was approximately 19,530 pounds.

Tank 241-CX-72 was used for approximately one year in 1956 when 2,305 gallons of Strontium Semiworks Complex waste was transferred into the tank for storage. Tank 241-CX-72 was used to study the concentration of waste generated from the Strontium Semiworks Complex pilot studies. The tank was also an experimental tank to study the characteristics of self-concentrating waste from the Plutonium Uranium Extraction (PUREX) process. The waste in the tank was heated until nearly dry.

From 1960 through 1967, Tank 241-CX-72 remained idle until taken out of service in 1967. In 1978, the tank was recorded as empty. Level measurements were taken in 1986, recording the tank as empty, after which the tank was filled with grout. In 1988, a rod from the paddle system of Tank 241-CX-72 was pulled out of the tank. Based on the contamination found on the rod, the tank is estimated to have 24 feet of grout, which was placed over an 11-foot deep heel of non-liquid MW.

Note: The scope of this Non-Financial Record Review, compliance inspection, Compliance Index No. 15.540, was to review inspection records against the requirements of Washington Administrative code (WAC) 173-303-320. The current condition of tanks, volumes left in place, or a field inspection of the area where the tank system is located, was not a part of the inspection scope.

Inspection Summary

This inspection was an announced Non-financial Record Review (NRR), which was performed as part of the complete evaluation inspection of the Hanford Site. The scope of the inspection was limited to a

review of the 241-CX Tank System's inspection schedule and records from June 2013 through June 2015. The review included the following documents:

- Technical Procedure 2CP-SUR-C-04001, CPSM-PRO-OP-52673, Surveillance of Hot Semi Tanks 241-CX-70, -71, & -72, Revision 2 Change 2, dated March 16, 2015.
- Inspection Record: 241-CX-70/71/72 Annual Surveillance, Document Number SM-13-03824, Inspection Date: July 10, 2013.
- Inspection Record: 241-CX-70/71/72 Annual Surveillance, Document Number SM-14-03926, Inspection Date: July 7, 2014.

According to CPSM-PRO-OP-52673, inspections are "required to ensure systems are maintained in a safe condition while awaiting final closure, and that tank 241-CX-70 remains free from any product." Section 1.2, Scope, further states:

To ensure that conditions in tank CX-72 do not deteriorate, per Ecology letter 9404884, dated July 7, 1994, and Ecology letter 0302422, dated June 10, 2003, the following measures are to be implemented until the 200-SO-1 work plan deems otherwise:

- *Maintain the building over Tank CX-72 in its present condition.*
- *Prohibit the use of this building for any purpose other than the current one.*
- *Preserve access to the drywell in tank CX-72.*
- *Conduct inspections to verify compliance with the above conditions.*

I observed in the Ecology letter 9404884, dated July 7, 1994 the following regarding Tank 241-CX-72.

To ensure that conditions in Tank CX-72 do not deteriorate, I am requesting that the following measures be taken until the 200-SO-1 workplan deems otherwise:

- *Maintain the building over Tank CX-72 in its present condition.*
- *Prohibit the use of this building for any purposes other than the current one.*
- *Preserve access to the drywell in tank CX-72.*
- *Conduct monthly inspections to verify compliance with the above conditions.*

I observed in the Ecology letter dated June 10, 2003, regarding the tanks 241-CX-72 and 241-CX-71, reference number 0059691 is stamped on the letter, not 0302422, as described in CPSM-PRO-OP-52673. I also observed that:

Ecology agrees with the strategy of annual surveillance given the non-operational status of the units. However, if any annual inspections identifies any potential threats to human health or the environment, Ecology must be immediately notified and will reevaluate the necessity of monthly and quarterly inspections.

Under Section 1.3, Applicability in CPSM-PRO-OP-52673, I observed the following descriptions for the three tanks.

Tank 241-CX-70 is a 30,000 gallon capacity, underground waste-handling tank. A residual inventory of approximately 750 gallons of radioactive waste regulated as dangerous waste under Washington Administrative Code (WAC) 173-303 and assigned the waste code of D007 and D010 per Storage/Disposal Approval Record (SDAR) No. 06-1H-2SM-030A was removed in 1991, and the tank was confirmed empty in 1992.

Tank 241-CX-71 was installed in the early 1950s as a waste neutralization tank of approximately 3,800-gallon capacity. The tank is constructed of stainless steel and is approximately 9 feet in diameter by 9 feet high. The top of the tank is located approximately 3.5 feet below grade.

Tank 241-CX-72 is an approximately 2,000-gallon capacity, underground experimental waste concentrating tank located approximately 14 feet below grade.

Also the following statement is made for all three tanks (241-CX-70, 241-CX-71, and 241-CX-72), under Section 1.3, Applicability.

The (241-CX-70, 241-CX-71, and 241-CX-72) underground tank is being managed according to the Resource Conservation and Recovery Act (RCRA) interim status standards. Because the tank had contained a dangerous waste, it is defined as a dangerous waste tank system until it is decontaminated.

Under Section 4 in CPSM-PRO-OP-52673, the surveillance procedures for conducting the annual inspection are provided and refer to "Data Sheet 1 – Site Surveillance." The section also describes how to fill out Data Sheet 1 as well as actions to be taken when deficiencies are found. Sections 4.1 (Tank 241-CX-70 Surveillance), 4.2 (Tank 241-CX-71 Surveillance), and 4.3 (Tank 241-CX-72 Surveillance) have similar language regarding annual inspection activities and refer to Section 4.4, Disposition. Section 4.4 lists actions to be completed by the personnel conducting the annual inspection as well as actions to be taken by the Environmental Compliance Officer and the Field Work Supervisor. Section 4.4 also refers to "Ecology letter 0302422, dated June 10, 2003."

Note: The reference number 0059691 is stamped on the letter, not 0302422, as described in the 241-CX Tank System Technical Procedure CPSM-PRO-OP-52673.

On Data Sheet 1 – Site Surveillance in CPSM-PRO-OP-52673, I observed that the column next to the three tanks is titled "Completed Initial/Date." The criteria items to be reviewed for the annual inspection include the following:

- **Site Secure** – Criteria: Site boundary in place; no signs of removal or tampering of flanges on exposed tank risers; flanges are tightly sealed.
- **Structural Integrity** – Criteria: There is no new damage or deterioration, e.g., structural faults, damaged/friable asbestos, openings or holes in buildings/walls/ceilings/doors that would allow pests into the facility, no unpainted or deteriorating wooden pieces, upper edge of roof and flashing is in good condition, and there are no obvious abnormal or unsafe conditions.
- **Animal/Pest Intrusion** – Criteria: There is no new evidence of animal issues/intrusion, e.g., bird nests/droppings, anthills, beehives, termite nests, etc.
- **Housekeeping** – Criteria: Accumulation of dirt, sand, debris, tumbleweeds, etc., or equipment, material, etc., in/around the building is not acceptable.
- **Occupational Hazards** – Criteria: There are no occupational hazards that may endanger personnel, e.g., tripping and slipping hazards, broken steps, missing handrails, exit door egress locked or obstructed.
- **Signage** – Criteria: No missing or fallen signs or postings (e.g., radiological, confined space, electrical, etc.) Gates and entries to the facilities should be posted with "WARNING NO UNAUTHORIZED ACCESS" (or equivalent wording) signs.
- **Containers** – Criteria: There are no unlabeled or unidentified containers or hazardous materials observed.

- **Combustible Material Storage** – Criteria: There is no observed instance of unauthorized storage of combustible materials.
- **Combustible Loading** – Criteria: Combustible loading conditions are within allowable limitations and consistent with analyzed accidents.
- **Subsidence** – Criteria: There is no evidence of land subsidence.

At the bottom of Data Sheet 1 there are sections for a printed name, signature, and date. The Sections are titled “Performed by NCO 1,” “Performed by NCO 2,” “Performed by FPE or Delegate,” and “FWS Review.”

Note: NCO stands for Nuclear Chemical Operator; FWS stands for Field Work Supervisor; and FPE stands for Fire Protection Engineer.

I did observe that procedure CPSM-PRO-OP-52673 provides Data Sheet 2 – Hot Semi Tanks 241-CX-70, -71, & -72 Surveillance – Comments Sheet, which is used for documented deficiencies and actions taken to correct the deficiencies. There is space for the identified deficiency, description, location, actions taken, and work document number. At the bottom of Data Sheet 3, there is space for the printed name, signature, and date where personnel can document who performed the work and a review by the FWS.

I observed that the Data Sheet 1 – Site Surveillance, which was used for the annual inspection dated July 10, 2013, was a different version from the Data Sheet 1 provided in the current technical procedure. I observed the data sheet used was revision 2, change 1. I did not observe significant changes between the Data Sheet 1 utilized on July 10, 2013, and the one provided to me in CPSM-PRO-OP-52673. I observed that a separate Data Sheet 1 was utilized for each of the three tanks 241-CX-70, 241-CX-71, and 241-CX-72.

- I observed the date “7-10/13” next to 241-CX-70 tank site. I observed “Structural Integrity” and “Signage” were marked no with the number 1 and 2 written respectively. I observed “Containers” was marked N/A. I observed the full printed name of the NCO inspector and only the first name initial and full last name of the FWS. I did not observe the time of the inspection written on the Data Sheet 1, for the July 10, 2013, annual inspection.

I observed the following observations made on the Data Sheet 2 – Hot Semi Tanks 241-CX-70, -71, & -72 Surveillance – Comments Sheet associated with Tank 241-CX-70.

- (1) *Wooden lid on tank has gap on NW Corner see pic, Work Document # -N/A- DP 7/11/13*
- (2) *Confined space sign needs replaced with correct sign (noted by IH) Vern Holder, Work Document # SM-12-5565-12*

I did not observe the nature of any repairs or remedial actions taken on the Data Sheet 1 or Data Sheet 2 for the July 10, 2013, annual inspection regarding the structural integrity or signage deficiencies noted for Tank 241-CX-70. I observed the date next to signatures written as “7-10/13” and the date “7/11/13” written next to the initials DP, but it is unclear if this is the date of repairs or remedial actions taken.

- I observed the date “7-10/13” next to 241-CX-71 tank site. I observed that “yes” was marked for all the items except “Containers,” which was marked “N/A.” I observed the full printed name of the inspector and only the first name initial and full last name of the FWS. I did not observe the time of the inspection written on the Data Sheet 1, for the July 10, 2013, annual inspection.

- I observed the date “7-10/13” next to 241-CX-72 tank site. I observed that “yes” was marked for all of the items. I also observed the number one written next to the mark for “Site Security.” I observed the full printed name of the inspector and only the first name initial and full last name of the FWS. I did not observe the time of the inspection written on the Data Sheet 1, for the July 10, 2013, annual inspection.

I observed the following observations made on the Data Sheet 2 – Hot Semi Tanks 241-CX-70, -71, & -72 Surveillance – Comments Sheet associated with Tank 241-CX-72.

(1) *Lid off tank make’s area open to environment* with the initials DP next to the comment.

I did not observe the nature of any repairs or remedial actions taken on the Data Sheet 1 or Data Sheet 2 for the July 10, 2013 annual inspection regarding the site security deficiency. I observed the date next to signatures written as “7-10/13” and the date “7/11/13,” but it is unclear if this is the date of repairs or remedial actions taken.

I observed that the Data Sheet 1 – Site Surveillance, which was used for the annual inspection, dated July 9, 2014, was a different version from the Data Sheet 1 provided in CPSM-PRO-OP-52673. I observed the data sheet used was revision 2, change 1. I did not observe significant changes between the Data Sheet 1 utilized on July 9, 2014, and the one provided to me in CPSM-PRO-OP-52673. I observed that a separate Data Sheet 1 was utilized for each of the three tanks 241-CX-70, 241-CX-71, and 241-CX-72.

- I observed the initials and date “DSO 7-9-14” next to 241-CX-70 tank site. I observed that “yes” was marked for all the items except “Signage,” which was marked “no” with the number 1 written and circled. I observed the initials of the inspector. I did not observe the time of the inspection written on the Data Sheet 1, for the July 9, 2014, annual inspection.
- I observed the initials and date “DSO 7/9/14” next to 241-CX-71 tank site. I observed that “yes” was marked for all the items. I observed the initials of the inspector. I did not observe the time of the inspection written on the Data Sheet 1, for the July 9, 2014 annual inspection.
- I observed the initials and date “DSO 7/9/14” next to 241-CX-72 tank site. I observed that “yes” was marked for all of the items except “Signage,” which was marked “no” with the number 1 written and circled. I observed the initials of the inspector. I did not observe the time of the inspection written on the Data Sheet 1, for the July 9, 2014 annual inspection.

Note: Only a single page two of Data Sheet 1, which contains the space for names, signatures and dates was used for all three tanks. The inspector provided their initials, signature and date for all three tank inspection records. Also only a single Data Sheet 2 was used for the deficiencies noted on the 241-CX-70 and 241-CX-72 inspection records.

I observed the following on the single Data Sheet 2 – Hot Semi Tanks 241-CX-70, -71, & -72 Surveillance – Comments Sheet associated with Tank 241-CX-70 and Tank 241-CX-72.

(1) *Need new S+M facility signs no other new problems not from 2013 surv.*

I did not observe the nature of any repairs or remedial actions taken on the any Data Sheet 1 or Data Sheet 2 inspection records for the July 9, 2014, annual inspection regarding the signage deficiencies for 241-CX-70 or 241-CX-72. I observed the date next to signatures written as “7/9/14,” but it is unclear if this is the date of repair or remedial action taken.

Compliance Problems

The Dangerous Waste inspection on June 30, 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 60 days of receipt 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: Edward Holbrook
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 Edward Holbrook 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:
Edward Holbrook at (509) 372-7909**

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

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

WAC 173-303-320(2): The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. In addition:

(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 on the Data Sheet 1 used for the July 9, 2014 inspection had initials "DS Old" rather than the full name of the inspector. The time of the annual inspections were not documented on the Data Sheet 1 for July 10, 2013 or July 9, 2014. I also did not observe the date and nature of any repairs or remedial actions taken on the Data Sheet 1 or Data Sheet 2 for the July 10, 2013, or July 9, 2014, annual inspections.

Action Required: Within 30 days upon receipt of this compliance report, USDOE and CHPRC must note in their operating record the dates that inspection records were deficient and the description of the deficiency with WAC 173-303-320(2)(d) requirements and submit a copy of the documentation placed in the operating record to Ecology.

USDOE and CHRPC must immediately start documenting the time of the inspection on the inspection records and within 60 days upon receipt of this compliance report, USDOE and CHPRC must also update and submit to Ecology, an inspection record with a space to document the time of the inspection that meets the requirements of WAC 173-303-320(2)(d).

Concerns

1. Both the lids associated with the 241-CX-70 and 241-CX-72 tanks were not closed. It is unclear if the lids are a part of the tank system or just on top of the tank system. Since only annual inspections are conducted, it is unclear how long the lids were not closed. If maintenance or other inspections were conducted that prompted the removal of the lids, those procedures or documentation were not directly associated or referenced in the Data Sheets (1 or 2) utilized.
2. From the records provided, there appears to be no inspection schedule required for DW inspection under 40 CFR Part 265 Subpart J – Tank Systems for the 241-CX Tank System. There were from Ecology letters noting a frequency other than the annual inspection completed in accordance with the 241-CX Tank System Technical Procedure. Documentation regarding the reasons for not scheduling other frequencies for inspections is referenced as 0302422, when the actual reference number 0059691 is stamped on the letter.

The frequency of inspections will need review because the lids on 241-CX-70 and 241-CX-72 were noted as off during the July, 10, 2013 annual inspection.

3. I observed that “yes” was marked for all of the items during the July 10, 2013, inspection of 241-CX-72. I also observed the number “1” written next to the mark for “Site Security.” I observed the following observations made on the *Data Sheet 2 – Hot Semi Tanks 241-CX-70, -71, & -72 Surveillance – Comments Sheet* for the Tank 241-CX-72 inspection.

Lid off tank make's area open to environment with the initials DP next to the comment.

Personnel training should be reviewed for personnel who conduct and document observations made during inspections in accordance with WAC 173-303-320. The criteria item should have been marked “No.” The observation was appropriately documented on the Data Sheet 2. The date and nature of repair or remedial action should have been documented on the Data Sheet 2.

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 Edward Holbrook at (509) 372-7909 (Voice) or use the Washington State Relay operator by dialing either 711 or 1-800-833-6388 (TTY).