



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

15-ESQ-0100

AUG 13 2015

Ms. J. A. Hedges, Manager  
Nuclear Waste Program  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Hedges:

RESPONSE TO THE DANGEROUS WASTE COMPLIANCE INSPECTION ON  
JANUARY 22, 2015, AT THE T PLANT COMPLEX, RESOURCES CONSERVATION AND  
RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM  
(NWP) COMPLIANCE INDEX NO. 15.513 COMPLIANCE PROBLEMS AND CONCERNS  
DATED JUNE 11, 2015

This letter is responding to your letter dated June 11, 2015, (15-NWP-110) regarding the T Plant Complex Compliance Inspection that was performed on January 22, 2015. The T Plant Complex is operated by CH2M HILL Plateau Remediation Company (CHPRC) for the U.S. Department of Energy (DOE) Richland Operations Office (RL). RL and CHPRC have reviewed the identified compliance problems, concerns, and requested actions described in the referenced letter and has provided responses in Enclosure 1 and the requested documents in Enclosures 2, 3, and 4.

Many of the potential compliance issues and concerns are directly related to ongoing discussions with the Washington State Department of Ecology (Ecology). Examples include training plans, major risk labeling, floor repairs, and waste analysis plans issues that are the specific topics of an Ecology/RL-lead Contractor/RL/DOE Office of River Protection that are part of the on-going Hanford Facility RCRA permit renewal effort being led by Ecology. RL and CHPRC believe impose actions that conflict with and/or are not in coordination with these other efforts should be left in the purview of the work groups to resolve. RL and CHPRC believe they are compliant with regulatory requirements related to Ecology concerns that have been raised and have provided the basis for that belief in Enclosure 1.

Ms. J. A. Hedges  
15-ESQ-0100

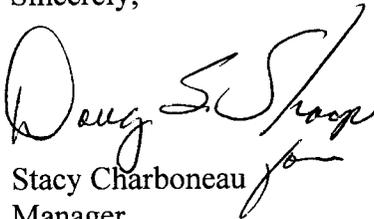
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RL and CHPRC will discuss these compliance issues and concerns with Ecology and provide additional information as needed on these topics. It is our expectation that most of the issues that are the basis for Ecology's compliance issues and concerns are being, or will be resolved through the permitting process and use of the Tier 1/Tier 2 issue resolution processes.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Acting Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,

  
Stacy Charboneau  
Manager

ESQ:ACM

Enclosures:

1. Response to Ecology letter (15-NWP-110)  
dated June 11, 2015
2. Response to Ecology Compliance Issue 1
3. Response to Ecology Compliance Issue 3
4. Response to Ecology Compliance Issue 4

cc w/encls:

Administrative Record, TSD: T-2-4 (Hard Copy)  
Ecology NWP Library (Hardcopy)  
Environmental Portal, LMSI, A3-95  
HF Operating Record (J. K. Perry, MSA, A3-01)

cc w/o encls:

D. B. Bartus, EPA  
J. L. Boller, EPA  
J. W. Cammann, MSA  
J. A. Ciucci, CHPRC  
D. A. Faulk, EPA  
M. N. Jaraysi, CHPRC  
J. W. Mathey, Ecology  
J. B. Price, Ecology  
K. Schanilec, EPA  
D. G. Singleton, Ecology  
R. R. Skinnarland, Ecology  
J. F. Williams Jr, CHPRC

ENCLOSURE 1

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY  
LETTER 15-NWP-110,  
DATED JUNE 11, 2015,  
“DANGEROUS WASTE COMPLIANCE INSPECTION ON  
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COMPLIANCE PROBLEMS AND CONCERNS

Consisting of 13 pages,  
Including this cover page

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Ecology Compliance Issues

ITEM NO	ECOLOGY QUOTED WAC 173-303 REFERENCE	ECOLOGY OBSERVATION	ECOLOGY PROPOSED ACTION	DOE/CHPRC RESPONSE
1	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: (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.	Documentation provided for containers #0047674, #0077122, #0079701, #221 T-12-000004, and #221 T-96-000009 listed that a receipt date for storage at the facility was "N/ A" because the waste was generated at T Plant.	Record the dates of storage for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009 into the operating record. <b>Submit to Ecology within 60 days of receipt of this report,</b> documentation showing that the dates of storage have been added to the operating record.	SWIR310 reports are attached showing the accumulation dates for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009. The accumulation date is indicated in the upper right hand corner of the first page of each report. These SWIR310 reports are also available in the operating record. The SWIR310 reports for containers #0047674, #0077122, #0079701, and #221T-12-000004 were also provided previously via CD on 01/22/15.
2	WAC 173-303-380(3)(a). All facility records, including plans, required by this chapter must be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the department who is designated by the director.	<p>Training records for the Environmental Manager and the CHPRC SPOC were requested during the January 22, 2015 inspection, and were not provided to Ecology when requested. CHPRC responded to the Ecology request by stating, <i>Mr. Brian J Dixon and Mr. Wayne Toebe is an employee 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.</i></p> <p>During the inspection Mr. Dixon stated that the training plan is two-phased; there is a Hanford site-wide training plan for all Hanford employees and a unit-specific training for T Plant employees. At a minimum, training for all employees must include familiarization with emergency equipment and emergency procedures.</p>	Upon receipt of this inspection report, USDOE-RL and CHPRC will respond to Ecology representative's future requests by providing all facility records required by WAC 173-303, Dangerous Waste Regulations to Ecology.	Noted. Training records will be provided as required by WAC 173-303-330(2) "Written training plan."

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		Records of required training must be maintained in accordance with WAC 173-303-330(3).		
3	WAC 173-303-400, and by reference, 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.	D0-040-016, Revision 9, <i>Perform Weekly and Daily Surveillance of WMA 's</i> states, "weekly inspections are conducted at all T Plant WMAs and 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.	Place a notation in the T Plant operating record that the weekly inspection for this time frame was not performed. <b>Submit to Ecology within 60 days of receipt of this report</b> , documentation that the notation was recorded in the operating record.	The inspection sheet for the week of 3/2/2014 through 3/8/2014 was completed as required but not processed properly into the operating record. Following the Ecology inspection, the inspection sheet was located and is attached to this response. The inspection sheet for the week of 3/2/2014 through 3/8/2014 has also been processed properly into the operating record.
4	WAC 173-303-400, and by reference, 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.  and Agreed Order and Stipulated Penalty, DE10156, Appendix A, Section 1.10.2.2, Track problems resulting from malfunctions and deterioration, operator errors, and discharges (WAC 173-303-320(1)) or necessary repairs or remedial actions (WAC 173-303 320(2)(d)) including the remedy and date of the remedy, keep this information in the operating record, and provide the record upon request (WAC 173-303-380).	For the 214-T Building inspection performed on 10/7/2014, the inspector identified "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.	Place a notation in the T Plant operating record listing the date and nature of any repairs or remedial actions taken. <b>Submit to Ecology within 60 days of receipt of this report</b> , documentation that the notation was recorded in the operating record.	Repairs have yet to be performed on the 214-T floors. Notations in inspection sheets documenting the containment systems as SAT for 214-T were erroneous. The current inspection sheets (an example for week ending 07/04/15 is attached) correctly document the containment systems as UNSAT, and the cracks in the floor are being tracked as an "Open Item". Repairs are scheduled to begin in August 2015.
5	WAC 173-303-400, and by reference, WAC 173-303-330(2). Written training plan. The owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records: (a) For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position.	T Plant DW Training Plan, Table 3-1 - <i>Job Titles/Positions at T Plant</i> , 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: <ul style="list-style-type: none"> <li>• Prepare and/or maintain records as required in WAC 173-303.</li> </ul>	Revise PRC-STD-TQ-40228, <i>T Plant Dangerous Waste Training Plan</i> to include the job title/position for all personnel who perform DW tasks associated with T Plant. Develop for each job title/position a description which includes the requisite skills, education, other qualifications, and duties. <b>Submit to Ecology within 60 days of receipt of this report</b> , an updated DW training plan that reflects these revisions.	DOE/CHPRC continues to operate the T Plant Complex in compliance with all applicable interim status standards of Washington Administrative Code (WAC) 173-303-400(3) until a final status permit is issued or until closure of this dangerous waste management unit. The existing T Plant Complex Dangerous Waste Training Plan (DWTP) is fully compliant with the

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		<ul style="list-style-type: none"> <li>• Provide training required under the DW training plan.</li> <li>• Provide DW regulation interpretations which affect DW management operations.</li> <li>• Are responsible for notifications as required in WAC 173-303.</li> <li>• Perform emergency response efforts required under WAC 173-303.</li> </ul>		<p>regulatory requirements. Ecology's June 11, 2015 letter (15-NWP-110) indicated that personnel with the following duties must be addressed in the DW training plan:</p> <ul style="list-style-type: none"> <li>• Prepare and/or maintain records as required in WAC 173-303</li> <li>• Provide training required under the DW training plan</li> <li>• Provide DW regulation interpretations which affect DW management operations</li> <li>• Are responsible for notifications as required in WAC 173-303</li> <li>• Perform emergency response efforts required under WAC 173-303.</li> </ul> <p>As stated in the DOE letter (15-ESQ-0078) to Ecology, dated June 11, 2015, Subject: <i>Response to State of Washington, Department of Ecology Letter 15-NWP-086, May 8, 2015, Regarding Two Dangerous Waste Compliance Inspections for Facilities Operated by CH2M Hill Plateau Remediation Company, Nuclear Waste Program Compliance Index Numbers 14.511 and 14.512, 1500873a</i>, DOE/CHPRC disagree with Ecology's interpretation and based on EPA guidance, assert that the regulations intend to require training only for the following specific individuals:</p> <ul style="list-style-type: none"> <li>• Training to individuals physically managing hazardous waste who have the opportunity to cause a release that could impact human health or the environment, and</li> <li>• Training to individuals who are in close proximity to hazardous waste</li> </ul>

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				<p>activities that could be impacted should such a release occur.</p> <p>As with the DOE letter (15-ESQ-0078) DOE/CHPRC offer the following discussions to further clarify our position:</p> <ol style="list-style-type: none"> <li>1. <u>U.S. Environmental Protection Agency regulations and guidance</u>            The U.S. Environmental Protection Agency (EPA) promulgated the training plan requirements for hazardous waste management on May 19, 1980 [45 FR 33182]. EPA stated (p33182), "The purpose of the proposed training requirements was to reduce the potential for mistakes which might threaten human health or the environment by ensuring facility personnel acquire expertise in the areas to which they are assigned". This position has been reiterated by EPA in guidance, indicating that "(T)he intent of the personnel training requirements is to reduce the potential for mistakes which might threaten human health or the environment by insuring that facility personnel <u>working in jobs where they handle hazardous waste</u> will be thoroughly familiar with their duties and responsibilities" (Emphasis added) [OSWER Directive 9523.00-10 Section 5.12.2]. Further ". . . your programs will prepare your employees to operate and maintain the hazardous waste facility in a safe manner". On March 24, 1986 [51 FR 10165], EPA indicated, in response to a commenter, that "employees who work in or adjacent to areas where hazardous wastes are generated, </li> </ol>

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				<p>handled, or stored <u>but do not handle hazardous wastes</u>, must still be trained to be thoroughly familiar with basic emergency procedures." In accordance with the Dangerous Waste Training Plan, employees who work unescorted at T-Plant but do not have waste management duties receive training in emergency response procedures specific to T-Plant, as well as General Employee Training.</p> <p>In another example, EPA's Resource Conservation and Recovery Act of 1976 (RCRA) "RCRA Personnel Training Guidance Manual for Owners or Operators of Hazardous Waste Management Facilities" (SW-915, Sept. 1980), Section 4.1.1, "What Types of Training Are Needed?" identifies two types of activities that require training; 1) routine day-to-day hazardous waste handling, storage, treatment and disposal operations and 2) emergency response activities. Section 4.1.2 "Who Should Be Trained?" continues, "[regarding] routine day-to-day hazardous waste management operations, training should be administered to all responsible on-site supervisory personnel and to all persons handling, storing, treating and disposing of hazardous waste."</p> <p>It is clear that EPA intended that workers that directly manage hazardous waste, and their supervisors, must receive training on the hazardous waste management procedures relevant to their individual responsibilities and workers that do not handle hazardous wastes but</p>

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				<p>could be impacted must receive training on basic emergency response procedures. Consequently, in accordance with the T-Plant Dangerous Waste Training Plan, personnel who visit or perform work at T-Plant have taken General Employee Training, Hanford Site Visitor Orientation, or Hanford Site Orientation (CBT), which provide training on basic emergency response procedures.</p> <p>EPA regulations and guidance support RL's and CHPRC's conclusion that a compliant DW Training Plan is not required to include the additional job/titles/positions requested by Ecology.</p> <p>2. <u>Ecology Regulations and Dangerous Waste Permits</u></p> <p>WAC 173-303-330(1)(e) provides some assistance in determining the types of activities that would be considered "dangerous waste management" activities and the type of training required. At a minimum, the training program must familiarize facility personnel with emergency equipment and systems and emergency procedures. The LLBG DW Training Plan meets and exceeds this minimum requirement. There is no indication that persons involved with maintaining records, providing training or providing regulatory interpretations are required to be included in the facility training plan.</p>

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				<p>Dangerous Waste permits issued by Ecology's Nuclear Waste Program (NWP) support RL's and CHPRC's conclusion that a compliant DW training plan is not required to include the job/titles/positions requested by Ecology.</p> <ul style="list-style-type: none"> <li>• The Hanford Facility Dangerous Waste Permit (HF DW Permit), Rev. 8C, contains DW training plans for seven Treatment, Storage and Disposal (TSD) operating units on the Hanford site including:               <ul style="list-style-type: none"> <li>– PUREX Storage Tunnels</li> <li>– Liquid Effluent Retention Facility &amp; 200 Area Effluent Treatment Facility,</li> <li>– 242-A Evaporator</li> <li>– 325 Hazardous Waste Treatment Units</li> <li>– Waste Treatment &amp; Immobilization Plant</li> <li>– Integrated Disposal Facility</li> <li>– 400 Area Waste Management Unit.</li> </ul> </li> </ul> <p>None of the approved DW training plans associated with these permitted TSDs include the job/titles/positions requested by Ecology. Ecology provided guidance and clarifications in a series of meetings in 1999 and 2000 leading to the current training matrices (including the job positions to be included in the matrices) for these units. Additionally, the HF DW Permit is</p>

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				<p>in the process of being re-issued and Ecology has not identified this as an area of concern for the HF DW Permit re-issuance as evidenced by the fact that there is no working group addressing this topic.</p> <p>Finally, as recently as April 2012, personnel training plans included in Ecology NWP's draft Rev. 9 of the HF DW Permit, that went out for public review, did not significantly change or add to the jobs/titles/positions covered by the plans currently in Rev. 8C of the HF DW Permit.</p> <ul style="list-style-type: none"> <li>The DW permit issued by Ecology's NWP in 2006 to Puget Sound Naval Shipyard does not include the job/titles/positions requested by Ecology. Nor does the DW permit issued by Ecology's NWP in 2010 to Areva NP Inc. Ecology has repeatedly made the correct determination that the job/titles/positions required to be included in a TSD's DW training plan do not include those recently requested by Ecology.</li> </ul> <p>Also, since Ecology's approval of the aforementioned DW training plans, there have been no changes to WAC 173-303-330 provisions that would appear to direct Ecology's requirement to add additional positions to the plans.</p> <p>The Ecology observation of this training plan is a site-wide issue that affects all the contractors on the Hanford site. As such,</p>

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				this issue is more appropriately discussed/negotiated through the HF DW Permit re-issuance efforts that are currently ongoing.
6	WAC 173-303-400, and by reference, WAC 173-303-630(3). Identification of containers. The owner or operator must label containers in a manner which adequately identifies the major risk(s) associated with the contents of the containers for employees, emergency response personnel and the public (note: If there is already a system in use that performs this function in accordance with local, state or federal regulations, then such system will be adequate). The owner or operator must affix labels upon transfer of dangerous wastes from one container to another. The owner or operator must destroy or otherwise remove labels from the emptied container, unless the container will continue to be used for storing dangerous waste at the facility. The owner or operator must ensure that labels are not obscured, removed, or otherwise unreadable in the course of inspection required under WAC 173-303-320.	Containers #0077128 and #0079701 located in Building 214-T storage were labeled with the DOT Class 9 shipping labels. I observed no other risk labels on the two containers that indicated the major risk(s) associated with the waste.	Label containers #0077128, #0079701, and all other containers in storage at T Plant with the major risk(s). <b>Submit to Ecology within 60 days of receipt of this report</b> , documentation showing that the major risk(s) labeling has been added to the containers.	<p>The two containers located in the 214-T Bay identified during the January 22, 2015 inspection contained the following wastes:</p> <p><u>Container Number 0079701</u>          This 30-gallon container contained miscellaneous electronic components, breakers, fuses, circuit boards, and non-PCB transformers.</p> <p>Container 0079701 has been reclassified as scrap metal for recycle and is therefore subject to WAC 173-303-120(2)(iv) and no longer subject to the major risk marking requirements at WAC 173-303-200(1)(d). The dangerous waste label and the Department of Transportation (DOT) Hazard Class 9 major risk label were removed and the container was transferred on June 10, 2015, to the Hanford Site 1162 Building as excess material/scrap metal for shipment to an off-site scrap metal recycler.</p> <p><u>Container Number 0077128</u>          This 10-gallon container is being used to collect tritium exit signs. The dangerous waste designation for these signs is for the heavy metals cadmium (D006) and silver (D011). The major risks associated with this container were correctly identified on the container during the January 22, 2015 Ecology inspection, as "Radioactive" and miscellaneous hazardous material (DOT hazard class 9 label). The dangerous waste constituents for cadmium (0.0001 kg) and chromium (0.0005 kg) do not present other major hazards or risk</p>

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				<p>categories. Container 0077128 has been scheduled for shipment on July 22, 2015, to the Environmental Restoration Disposal Facility (ERDF) for treatment and disposal.</p> <p><u>All other containers in storage at T-Plant</u>            CHPRC has reviewed the risk labeling for all other containers stored at T-Plant and has determined that they are compliant with the dangerous waste requirements. The DOT Hazard Class labels and markings are an internationally recognized hazard communication system that adequately identifies waste hazards to employees, including contractor personnel, and emergency response personnel since they are trained on site-specific hazard communication systems. We understand Ecology generally does not support the use of DOT hazard class 9 label because Ecology feels it does not adequately communicate the hazard to the general public. We believe the label is adequate on the Hanford site because the entire Hanford site is restricted from access by the general public. Any visitors must receive orientation training and be appropriately escorted by trained CHPRC personnel. In the unlikely event that the general public is authorized to be in an area where dangerous waste is being accumulated, they will be escorted by personnel that understand the CHPRC major risk system i.e., the Hazardous/Dangerous Waste mark and the applicable DOT Hazard Class label or marking. The visiting public in this case will be aware of the major risks via their CHPRC escort.</p> <p>Conclusion            The two identified containers and all other containers in storage at T-Plant are</p>

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY LETTER 15-NWP-110, DATED JUNE 11, 2015,  
 “DANGEROUS WASTE COMPLIANCE INSPECTION ON JANUARY 22, 2015 AT THE T PLANT COMPLEX, RESOURCE  
 CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM (NWP)  
 COMPLIANCE INDEX NO. 15.513” – COMPLIANCE PROBLEMS AND CONCERNS

ITEM NO	ECOLOGY QUOTED WAC 173-303 REFERENCE	ECOLOGY OBSERVATION	ECOLOGY PROPOSED ACTION	DOE/CHPRC RESPONSE
				adequately marked to identify the major risks to the limited personnel who could be in the area of the containers.

**Ecology Concerns**

ITEM NO	ECOLOGY CONCERN	DOE/CHPRC RESPONSE
1	It is not clear that there is an established method used consistently to account for the amount of MW in the 221-T tank system in the Annual Hanford LDR report. USDOE-RL and CHPRC should establish a standard method for reporting this amount consistently and accurately year after year.	Based on comments from Ecology on the LDR Report for CY2013 for the 221-T tank system that were provided during the T Plant Complex TSD Compliance inspection, CHPRC SWOC Engineering performed a review to determine the approximate total amount of mixed waste in the 221-T tank system heels. Based on this review, the calculation was developed using a 1-inch heel for each tank. CHPRC SWOC Engineering calculated the volume of each tank, and based on the calculations the estimated total quantity of mixed waste for all the 221-T tank system tanks is 1.7m <sup>3</sup> . CHPRC SWOC Engineering has determined that the evaporation of the liquids within the tanks has ceased with physically solid waste remaining in the heels of the tanks. This mixed waste volume number will be used for the annual LDR reports until the tanks are closed. The CY2014 LDR Report that was submitted to Ecology on April 21, 2015 (15-ARMP-0120) identifies that the volume of 221-T tank system mixed waste that is being stored is 1.7m <sup>3</sup> .
2	HNF-9921, Revision 6, <i>T Plant Complex Waste Analysis Plan</i> , Section 2.5, <i>Discrepant Container Management</i> , states that the following are discrepant issues and will be tracked in the Discrepant Container Management Program until the issues are resolved. Included in the list of issues are: indications of bulging, containers with unknown contents, containers holding waste prohibited under Section 1.2, containers no longer in good condition and not in compliance with 40 CFR 265.171, inconsistent inventory between container contents and the record, and unexpected liquids are found. WAC 173-303-630(2) states, <i>if a container holding dangerous waste is not in good condition (e.g.,</i>	Containers not meeting the requirements in 40 CFR 265.171 and WAC 173-303-630 are evaluated for entry into WMP-200, Section 4.29 (PRC-PRO-EP-52328 SWOC Discrepant Container Management Program.) If the container is entered into the DCMP under Appendix A: Item D, Damaged or corroded (degraded) containers, the container will also be entered into WMP-200-4.12 (PRC-PRO-NS-52318, SWOC Abnormal Container Management Program under Appendix A, Issue #8, Damaged or corroded (degraded) containers. Physical damage to a container requires correction within a 30-day

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 CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM (NWP)  
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ITEM NO	ECOLOGY CONCERN	DOE/CHPRC RESPONSE
	<p><i>severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the dangerous waste from the container to a container that is in good condition or manage the waste in some other way that complies with the requirements of chapter 173-303 WAC. The requirement of this section is to move the DW to a compliant container if a container is not in good condition or manage the waste in some other compliant manner. Placing containers of DW into a program indefinitely without a near-term schedule for correcting the problem does not resolve the non-compliance. The facility WAP should not direct the facility to be out of compliance with the requirements of WAC 173-303-630(2).</i></p>	<p>time frame and is tracked through the ACMP (Note for Step 5). The ACMP and DCMP require mitigation of the container (correction of the discrepancy such as overpacking).</p> <p>DO-040-016, Perform Weekly and Daily Surveillance of WMA's (TPLN-PRO-OP-51748) Section 4.1.11 checks for the integrity of the container and if there is an issue the container is evaluated for entrance into the ACMP (contains a 30-day clock for correction of deteriorated containers, ACMP issue #8).</p>
3	<p>TPLN-PRO-OP-51748, D0-040-016, Revision 9, <i>Perform Weekly and Daily Surveillance of WMA 's, Section 1.1 states, daily inspections are conducted at all T Plant Waste Management Areas (WMAs) [also known as Dangerous Waste Management Units (DWMU)] and Waste Accumulation Areas (WAAs) and shall be performed on a daily basis during normal working hours. Inspections will not be performed on facility closure days. The daily inspection fulfills the requirements listed in WAC 173-303-320(2)(d) and TSR- SAC 5.6.4. It is unclear what is meant by Waste Accumulation Areas (WAAs) in a TSDF. WAC 173-303-040 defines "storage" as the holding of dangerous waste for a temporary period and states that accumulation of dangerous waste, by the generator on the site of generation, is not storage as long as the generator complies with the applicable requirements of WAC 173-303-200 and 173-303-201." If DW or MW is considered accepted into the TSD storage as stated in Section 2.4 of the WAP upon generation, it should be managed under the storage requirements listed in WAC 173-303-280 through -395 and any other requirements listed by reference in these sections. Accumulation of DW or MW should follow the applicable requirements of WAC 173-303-200 and WAC 173-303-201.</i></p>	<p>Dangerous or mixed waste that has been accepted into TSD storage is managed under the storage requirements listed in WAC 173-303-280 through -395 and any other requirements listed by reference in these sections. T-Plant does not accumulate dangerous waste under the &lt;90-day or satellite accumulation area provisions, but universal waste is accumulated at T-Plant.</p>

ENCLOSURE 2

RESPONSE TO ECOLOGY COMPLIANCE ISSUE 1  
COPIES OF SOLID WASTE INFORMATION AND TRACKING SYSTEM REPORTS  
(SWITS310) FOR THE FOLLOWING CONTAINERS;

SWITS310 CONTAINER NUMBER 0047674 (5 PAGES)  
SWITS310 CONTAINER NUMBER 0077122 (3 PAGES)  
SWITS310 CONTAINER NUMBER 0079701 (3 PAGES)  
SWITS310 CONTAINER NUMBER 221T-12-000004 (3 PAGES)  
SWITS CONTAINER NUMBER 221T-96-000009 (4 PAGES)

Consisting of 19 pages,  
Including this cover page

Solid Waste Information and Tracking System

SWIR310

Container Listing Report

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for Package ID: 0047674

Source Facility:

Location Facility:

Shipment #:

Package ID: 0047674

Waste Type: D LLW

Sec Waste Type: LLW

Encasement/HIC#:

Profile / Rev#: TBD - 00

MSRD / Rev #: 450 - 01

CCP Control?:

Secondary Pkg ID:

Phys State Cd: LS

UHC Determination: A

UHC's Applicable: A

NFPA < 93.3C:

Storage Category: M

Accumulation Date: 11/04/2002

Deadline Date: 02/01/2003

Ship Date:

TSD Receive Date:

TSD Accept Date:

Disposal Date:

Routine Status: 100 Non-Routine / Other

Container Type / Descr: DM / 85 GALLON

Container Volume (cu. meters): 0.3220

Labpack Flag: Y

Container Contents: <MM> OVERPACK OF 221T-02-000087. TANK 11L SAMPLE RETURNS.

SWO Comments:

Container Empty Tare Wt. (kg): 35.4000

Waste Weight (kg): 10.0000

Container Gross Wt. (kg): 130.6000

Generator Information

Generating Company: FH FLUOR HANFORD

Source Facility: 214T

Generator Comments: WRAPPED SAMPLE RETURNS FROM LABORATORY; PACKAGED IN RMA  
1/25/10 MOVED TO CANYON, JUST OUTSIDE THE HCA BOUNDARY. RB  
HS-032/BIN2 IS WHERE THE DRUM IS STORED.

Generator ID: 0061986 Generator Group: TRTFAC

Generator: LA JOHNSON

Billing Detail

Charge Code

123290

COA

EL00 FLUOR HANFORD

Group ID

TRTFAC

Percent

100.00

100.00

Solid Waste Information and Tracking System

Container Listing Report

for Package ID: 0047674

Source Facility:

Location Facility:

Shipment #:

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Hazardous Package Detail

Container Status: Full

Flashpoint: N/A

pH Value: >12.5

Subpart CC Flag: NA

DW Numbers: D002 D006 D007 D008 D010 F001 F002 F003 F004 F005

RCRA Reporting

ADWR Stream Description: Labpack -

Designation Code: DW

Source Code: G22 Lab Analytical Wastes

Comment:

Form Code: W001

Lab Packs, any source, not containing acute hazardous waste

Comment:

Origin Code: ii

Non-recurrent waste stream.

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

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for Package ID: 0047674

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Source Facility:

Location Facility:

Shipment #:

Radioactive Package Detail

Waste Category: WC3	Thm Power (w/cu.m.): .00000E+00
Combustible Flag:	Neutron Dose Rate (mrem/hr):
Exceeds ISB Limit: N	Contact Dose Rate (mrem/hr): 2.70000E+02
NRC Class: A	Tot Pe-Ci: 2.85111E-05
	ICRP 71 DE-Ci: 3.39584E-05

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date:

VOC Hold?:

VOC Resample Date:

Current Location Information

Facility ID: 2706T	Tier Level:	Loc Beg Coordinates - N:
Trench / Unit: YRD	Tier Position:	W:
Module:	GPS Data Flag:	Loc End Coordinates - N:
		W:

Location History

Location Date	Facility ID	Unit	Module	Tier Level	Tier Posn	Outermost Pkg ID
	2706T	YRD				

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Container Listing Report

for Package ID: 0047674

Source Facility:

Location Facility:

Shipment #:

<u>Isotope Information</u>		<u>Isotope Activity (Ci)</u>
<u>Isotope Number</u>	<u>Isotope Name</u>	
3	Sr-90	7.09000E-03
8	Cs-137	3.16000E-02
26	Am-241	4.99000E-06
41	Pu-238	1.50000E-06
97	Pu-240	3.99000E-06
98	Pu-241	6.59000E-05
99	Pu-242	2.30000E-10
100	Pu-239	1.69000E-05

Waste Component Records

<u>Component ID</u>	<u>Component Text</u>	<u>PPM</u>	<u>Weight (kg)</u>	<u>Weight %</u>
108-10-1	4-METHYL-2-PENTANONE	0.0003	0.0003	.0033
1310-73-2	SODIUM HYDROXIDE	3.3917	3.3917	33.92
1319-77-3	CRESOL	0.0001	0.0001	.00112
67-64-1	ACETONE	0.0016	0.0016	.016
71-55-6	1,1,1-TRICHLOROETHANE	0.0001	0.0001	.0006
7439-92-1	LEAD	0.0010	0.0010	.00975
7440-43-9	CADMIUM	0.0000	0.0000	.0001
7440-47-3	CHROMIUM	0.0037	0.0037	.0373
75-09-2	DICHLOROMETHANE	0.0003	0.0003	.003
7782-49-2	SELENIUM	0.0036	0.0036	.0355
78-93-3	METHYL ETHYL KETONE	0.0004	0.0004	.0036
GCNCAKE	FILTER CAKE	6.5972	6.5972	65.97
			10.0000	

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Container Listing Report

for Package ID: 0047674

Source Facility:

Location Facility:

Shipment #:

Packaging Components

<u>Component Description</u>	<u>Weight (kg)</u>
10 MIL LINER	0.4500
90 MIL LINER	7.0000
ABSORBENT PAD, POLYACRYLATE	0.1000
ABSORBENT PAD, POLYPROPYLENE	0.4500
INNER CONTAINER	26.3000
SHIELDING, LEAD	50.9000
	<hr/>
	85.2000

Inner/From Relationships

<u>Inner/From Package</u>	<u>Date</u>	<u>Operation</u>
221T-02-000087	11/20/2009	Disposal Overpack

Solid Waste Information and Tracking System  
Container Listing Report  
for Package ID: 0077122

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Source Facility:  
Location Facility:  
Shipment #:

Package ID: 0077122      Secondary Pkg ID:  
Waste Type: D NON      Phys State Cd:  
Sec Waste Type: NON      UHC Determination:  
Encasement/HIC#:      UHC's Applicables:  
Profile / Rev #: -      NFPA < 93.3C:  
WSRd / Rev #: -      Storage Category:  
CCP Control?:

Accumulation Date: 01/25/2012  
Deadline Date: 04/23/2012  
Ship Date:  
TSD Receive Date:  
TSD Accept Date:  
Disposal Date:

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: LEAKING ALKALINE BATTERIES  
SWO Comments:

Generator Information

Generating Company: CHPRC CH2M HILL PLATEAU REMEDIATION CO.      Generator ID: 0084895      Generator Group: TRTFAC  
Source Facility: 214T      Generator: BP CRUME

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for Package ID: 0077122

Source Facility:

Location Facility:

Shipment #:

Flashpoint:                      pH Value:                      Subpart CC Flag:

Hazardous Package Detail

Container Status:

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 Subtype:

PCB Contents:

PCB Source Concentration (PPM):

PCB Waste Weight (kg):

Removed from Service:

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for Package ID: 0077122

Source Facility:

Location Facility:

Shipment #:

Radioactive Package Detail

Waste Category:	snm 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:	RSWIMS 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: 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>
	214T	BAY				

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Container Listing Report

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for Package ID: 0079701

Source Facility:

Location Facility:

Shipment #:

Package ID: 0079701

Waste Type: D NON

Sec Waste Type: NON

Encasement/HIC#:

Profile / Rev#: -

WSRd / Rev #: -

CCP Control?:

Secondary Pkg ID:

Phys State Cd:

UHC Determination:

UHC's Applicable:

NFPA < 93.3C:

Storage Category:

Accumulation Date:

Deadline Date:

Ship Date:

TSD Receive Date:

TSD Accept Date:

Disposal Date:

Container Type / Descr: DM / 30 GALLON

Container Empty Tare Wt. (kg): 15.4000

Container Volume (cu. meters): 0.1136

Waste Weight (kg):

Labpack Flag: N

Container Gross Wt. (kg):

Container Contents:

MISCELLANEOUS ELECTRONIC COMPONENTS; BREAKERS, FUSES, CIRCUIT BOARDS, NON-PCB TRANSFORMERS.

SWO Comments:

Generator Information

Generating Company: CHPRC CH2M HILL PLATEAU REMEDIATION CO.

Generator ID: 0084895 Generator Group: TRTFAC

Source Facility: TPLANT

Generator: BP CRUME

Generator Comments:

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Container Listing Report

for Package ID: 0079701

Source Facility:

Location Facility:

Shipment #:

Hazardous Package Detail

Container Status:

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 Subtype:

PCB Contents:

PCB Source Concentration (PPM):

PCB Waste Weight (kg):

Removed from Service:

Flashpoint:                      pH Value:                      Subpart CC Flag:

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Container Listing Report

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for Package ID: 0079701

Source Facility:

Location Facility:

Shipment #:

Radioactive Package Detail

Waste Category:	snm 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:	RSWIMS 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: 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>
	214T	BAY				

Solid Waste Information and Tracking System  
Container Listing Report  
for Package ID: 221T-12-000004

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Source Facility:  
Location Facility:  
Shipment #:

Package ID: 221T-12-000004      Secondary Pkg ID:  
Waste Type: D NON      Phys State Cd:  
Sec Waste Type: NON      UHC Determination:  
Encasement/HIC#:      UHC's Applicabile:  
Profile / Rev#: -      NFPA < 93.3C:  
WSRD / Rev #: -      Storage Category:  
CCP Control?:

Container Type / Descr: PC / 5 GALLON      Container Empty Tare Wt. (kg):  
Container Volume (cu. meters): 0.0190      Waste Weight (kg):  
Labpack Flag: N      Container Gross Wt. (kg):  
Container Contents: 5 GALLON PLASTIC BUCKET FOR COMPACT FLUORESCENT BASES  
SWO Comments:

Generator Information

Generating Company:      Generator ID: 0061986      Generator Group: TRTFAC  
Source Facility:      Generator: LA JOHNSON  
Generator Comments:

Accumulation Date:  
Deadline Date:  
Ship Date:  
TSD Receive Date:  
TSD Accept Date:  
Disposal Date:

Solid Waste Information and Tracking System

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Container Listing Report

for Package ID: 221T-12-000004

Source Facility:

Location Facility:

Shipment #:

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 Subtype:

PCB Contents:

PCB Source Concentration (PPM):

PCB Waste Weight (kg):

Removed from Service:

Solid Waste Information and Tracking System

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for Package ID: 221T-12-000004

Source Facility:

Location Facility:

Shipment #:

Radioactive Package Detail

Waste Category:	snm 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:	RSWIMS 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:	BAY	Tier Position:		W:	
Module:		GPS Data Flag:		Loc End Coordinates - N:	
				W:	

Location History

Location Date	Facility ID	Unit	Module	Tier Level	Tier Posn	Outermost Pkg ID
	214T	BAY				

Solid Waste Information and Tracking System

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Container Listing Report

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for Package ID: 221T-96-000009

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Source Facility:  
Location Facility:  
Shipment #:

Accumulation Date: 02/28/1996  
Deadline Date: 05/28/1996  
Ship Date:  
TSD Receive Date:  
TSD Accept Date:  
Disposal Date:

Secondary Pkg ID: CW / 3\*8.5\*12 Container Empty Tare Wt. (kg): 708.5000  
Phys State Cd: S Waste Weight (kg): 674.9000  
UHC Determination: Container Gross Wt. (kg): 1383.4000  
UHC's Applicability:  
NFPA < 93.3C:  
Storage Category: M

Package ID: 221T-96-000009  
Waste Type: D TRU  
Sec Waste Type: TRU  
Encasement/HIC#: -  
Profile / Rev#: 270 - 00  
WSRD / Rev #: 270 - 00  
CCP Control?:

Container Type / Descr: CW / 3\*8.5\*12  
Container Volume (cu. meters): 8.6650  
Labpack Flag: N  
Container Contents: BOX CONTAINS PUREX "D" CELL JUMPER  
SWO Comments: <15 FGE, nonfissile, 11/8/10 - RPB

Generator Information  
Generating Company: FH FLDOR HANFORD  
Source Facility: 221T  
Generator Comments: CURRENTLY STORED IN T PLANT CANYON CELL 16R.

Generator ID: 0095130  
Generator Group: TRTFAC  
Generator: DE RICHARDS

Solid Waste Information and Tracking System

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Container Listing Report

for Package ID: 221T-96-000009

Source Facility:

Location Facility:

Shipment #:

Hazardous Package Detail

Container Status: Full Subpart CC Flag: N

Flashpoint: NG pH Value: 2-12.5

DW Numbers: D004 D005 D006 D007 D008 D009 D010 D011

RCRA Reporting

ADWR Stream Description: Debris - Metal, Solvents

Designation Code: DW

Source Code: G19 Other one-time or intermittent process

Comment: Facility Cleanout

Form Code: W002

Contaminated Debris, paper, cloth, rags, wood, empty fiber or plastic containers, glass, piping, or other solids

Comment:

Origin Code: i Recurrent waste stream.

Residual Mgmt Method:

Comment:

Management Method:

Comment:

Certification Group:

Reportable CERCLA?:

Pre-2007 Reporting

Waste Stream: M050 Offsite TSD Waste Stream: RCRA Designated Date:

PCB Package Detail:

PCB Type:

PCB Subtype:

PCB Contents:

PCB Source Concentration (PPM):

PCB Waste Weight (kg):

Removed from Service:

Solid Waste Information and Tracking System

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Container Listing Report

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for Package ID: 221T-96-000009

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Source Facility:

Location Facility:

Shipment #:

Radioactive Package Detail

Waste Category: WC3

Combustible Flag:

Exceeds ISB Limit: N

NRC Class: >C

snm Waste?:

Shielding: Lead

Handling: R

RSWIMS Container Cnt: 1

Excluded from DE-Ci:

Thermal Power (w/cu.m.): 7.16244E-04

Neutron Dose Rate (mrem/hr):

Contact Dose Rate (mrem/hr): 3.50000E+02

Tot Pe-Ci: 7.16724E-01

ICRP 71 DE-Ci: 6.81780E-01

VOC/Hydrogen Gas Diffusion Detail

H2 Diffusion Release Date:

VOC Hold?:

VOC Resample Date:

Current Location Information

Facility ID: 221T

Trench / Unit: CWA

Module:

Tier Level:

Tier Position:

GPS Data Flag:

Loc Beg Coordinates - N:

W:

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>
	221T	CWA				

Isotope Information

<u>Isotope Number</u>	<u>Isotope Name</u>	<u>Isotope Activity (Ci)</u>
26	Am-241	1.32000E-04
41	Pu-238	4.14000E-02
97	Pu-240	2.43000E-02
98	Pu-241	2.87600E+01
99	Pu-242	1.32000E-06
100	Pu-239	1.01600E-01

Solid Waste Information and Tracking System

SWIR310

Container Listing Report

07/13/2015 08:01

for Package ID: 221T-96-000009

Page 4 of 4

Source Facility:

Location Facility:

Shipment #:

Waste Component Records

<u>Component ID</u>	<u>Component Text</u>	<u>PPM</u>	<u>Weight (kg)</u>	<u>Weight %</u>
GCNMTLRAD	STAINLESS STEEL WITH RAD ISOTOPES (SOURCE)		674.9000	100
			674.9000	

ENCLOSURE 3

RESPONSE TO ECOLOGY COMPLIANCE ISSUE 3

COPY OF THE DO-040-016 PERFORM WEEKLY AND DAILY SURVEILLANCE OF  
WMA'S  
APPENDIX A – T PLANT WEEKLY WASTE MANAGEMENT AREA INSPECTION DATA  
SHEET FOR THE WEEK OF 03/02/2014 THROUGH 03/08/2014

Consisting of 12 pages,  
Including this cover page

Perform Weekly and Daily Surveillance of WMA's

Published Date: 02/13/2014 TPLN-PRO-OP-51748 Effective Date: 02/13/2014

Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.2	WMA free of transient combustible material [TSR]	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.3	Outdoor facility zones separated by ≥ 33 ft free of combustible material. [TSR]		SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.5	PCB, F020 thru F023, F026, F02Z, D001, & D003 waste on secondary containment	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.6	Secondary containment (Spill Pallets) is free of liquid and in good physical condition.		SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.7a	Containment system are free of cracks, gaps & deterioration	SAT / UNSAT		SAT / UNSAT		
4.1.7b	Containment systems free of liquid * 2706-T and TA sumps are exempt from this requirement	SAT / UNSAT				
4.1.8	Containers are elevated or palletized		SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.9	Barricades (chain, rope, fences, doors, etc.) AND postings (Rad postings, PCB marks, etc.) are intact and in good condition	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.10	Waste accumulation containers secured AND an inventory is attached or immediately available.			SAT / UNSAT / NA		

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Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.11	Check accessible surfaces of waste containers as follows: [TSR] <ul style="list-style-type: none"> <li>• Container not bulging</li> <li>• Containers free of physical damage</li> <li>• Containers free of corrosion</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.12	No precipitation collected on drum lids with NucFill filters <i>Note: Drums in hydrogen abatement period may not be covered.</i>		SAT / UNSAT / NA		SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.13	Containers are stored in manner that precludes rupture, damage, or leakage AND containers are closed & show no evidence of leaks or spills	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.14	Dangerous/hazardous waste containers are marked as dangerous or hazardous AND have major risk label, as applicable.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA

Perform Weekly and Daily Surveillance of WMA's

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Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.15	VERIFY Container ID number and other labeling & markings (e.g. Radioactive Material, Dose & Contamination values, Fissile Material, Fissile Material Content) are intact, unobscured, legible, and in good condition.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.16 Thru 4.1.18	TSCA PCB waste: <ul style="list-style-type: none"> <li>Has PCB label</li> <li>Has "Remove from Service" date</li> <li>&lt; 180 days has passed since removed from service (does not apply to radioactive materials) [CFR]</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.19	Incompatible waste is segregated	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.20	Containers stored in rows are: <ul style="list-style-type: none"> <li>no more than 2 wide and not stacked</li> <li>&gt;36 inch wide spacing between rows [TSR; FHA]</li> </ul>		SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.21	ACMP drums or drums requiring venting are protected from environmental conditions [TSR]	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.22	VERIFY drums listed on the ACMP list are properly labeled, labels are intact, and drums are in a safe configuration.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA

Perform Weekly and Daily Surveillance of WMA's

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Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.23	If NFPA lab pack drums are present in the 2706-T facility: <ul style="list-style-type: none"> <li>No more than 16 lab packs are present in 2706-T Facility</li> <li>Lab Packs are only stored in 2706-TA.</li> </ul> [TSR; FHA]			SAT / UNSAT / <del>NA</del>		
4.1.25	INSPECT the following: <ul style="list-style-type: none"> <li>General Housekeeping</li> <li>Orphan Containers/unapproved waste accumulation</li> <li>Unpackaged Waste</li> <li>Spills</li> </ul>	SAT / UNSAT				
4.1.29	Date of Inspection: 3-4-14 Time of Inspection: 0730 Inspector's Name (Printed): LYNN J. WILSON Inspector's Signature: <i>[Signature]</i>	3-4-14 0730 LYNN J. WILSON <i>[Signature]</i>	3-3-14 0840 LYNN J. WILSON <i>[Signature]</i>	3-4-14 0745 LYNN J. WILSON <i>[Signature]</i>	3-3-14 0800 LYNN J. WILSON <i>[Signature]</i>	3-3-14 0820 LYNN J. WILSON <i>[Signature]</i>

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Perform Weekly and Daily Surveillance of WMA's

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Appendix A - (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	214-T Building	211-T Cage	221-T BY Storage (Boneyard)	243-T Covered Storage Pad
4.1.2	WMA free of transient combustible material [TSR]	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.3	Outdoor facility zones separated by ≥ 33 ft free of combustible material. [TSR]		SAT / UNSAT / NA	SAT / UNSAT / NA	
4.1.4	243-T facility zones separated by ≥ 20 ft free of combustible material. [TSR]				SAT / UNSAT / NA
4.1.5	PCB, F020 thru F023, F026, F027, D001, & D003 waste on secondary containment	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.6	Secondary containment (Spill Pallets) is free of liquid and in good physical condition	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.7a thru 4.1.7c	Containment system are free of cracks, gaps & deterioration	SAT / UNSAT	SAT / UNSAT		
	Containment systems free of liquid	SAT / UNSAT	SAT / UNSAT		
4.1.8	Accumulated precipitation in each sump is below 25%. * NOTIFY Supervisor if level is greater than 25%	SAT / UNSAT	SAT / UNSAT		
	Containers are elevated or palletized	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.9	Barricades (chain, rope, fences, doors, etc.) AND postings (RAD postings, PCB marks, etc.) are intact and in good condition.	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.10	Waste accumulation containers secured AND an inventory is attached or immediately available.	SAT / UNSAT / NA		SAT / UNSAT / NA	
4.1.11	Check accessible surfaces of waste containers as follows: [TSR] <ul style="list-style-type: none"> <li>• Container not bulging</li> <li>• Containers free of physical damage</li> <li>• Containers free of corrosion</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA

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Reference Use

**Perform Weekly and Daily Surveillance of WMA's**

**Appendix A - (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet**

Step No.	Inspection Item	214-T Building	211-T Cage	221-T BY Storage (Boneyard)	243-T Covered Storage Pad
4.1.12	No precipitation collected on drum lids with NucFill filters Note: Drums in hydrogen abatement period may not be covered.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.13	Containers are stored in manner that precludes rupture, damage, or leakage AND containers are closed and show no evidence of leaks or spills	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.14	Dangerous/hazardous waste containers are marked as dangerous or hazardous AND have major risk label, as applicable	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.15	VERIFY Container ID number and other labeling & markings (e.g. Radioactive Material, Dose & Contamination values, Fissile Material, Fissile Material Content) are intact, unobscured, legible, and in good condition.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.16 thru 4.1.18	TSCA PCB waste: • Has PCB label • Has "Remove from Service" date • < 180 days has passed since removed from service (does not apply to radioactive materials) [CFR]	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.19	Incompatible waste is segregated	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.20	Containers stored in rows are [TSR; FHA]; • no more than 2 wide and not stacked • >36 inch wide spacing between rows	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.21	Drums in the ACMP or drum requiring venting are protected from environmental conditions [TSR]	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.22	Verify drums listed on the current ACMP list are properly labeled, labels are intact, and drums are in a safe configuration,	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA

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**Perform Weekly and Daily Surveillance of WMA's**

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**Appendix A - (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet**

Step No.	Inspection Item	214-T Building	211-T Cage	221-T BY Storage (Boneyard)	243-T Covered Storage Pad
4.1.24	ENSURE the following controls are met for 243-T facility waste zones: <ul style="list-style-type: none"> <li>No combustible waste containers</li> <li>No open containers filled with waste</li> <li>No plastic spill pallets</li> </ul>				SAT / UNSAT / 
4.1.25	INSPECT the following: <ul style="list-style-type: none"> <li>General housekeeping</li> <li>orphan container / unapproved waste accumulation</li> <li>Unpackaged waste</li> <li>Spills</li> </ul>	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.29	Date of Inspection: 3-3-14 Time of Inspection: 0900 Inspector's Name (Printed): L. JOHNSON Inspector's Signature: 	3-3-14 0900 L. JOHNSON 	3-3-14 0920 L. JOHNSON 	3-3-14 0730 L. JOHNSON 	3-3-14 0700 L. JOHNSON 

Perform Weekly and Daily Surveillance of WMA's

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Appendix A (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	221-T Ops Gallery Storage	221-T Head End and Ramp	271-T Mezzanine Tank	Closed Waste Storage Areas
4.1.2	WMA free of transient combustible material [TSR]	SAT / UNSAT	SAT / UNSAT		
4.1.3	Outdoor facility zones separated by ≥ 33 ft free of combustible material. [TSR]		SAT / UNSAT / NA		
4.1.5	PCB, F020 thru F023, F026, F027, D001, & D003 waste on secondary containment	SAT / UNSAT / NA	SAT / UNSAT / NA		
4.1.6	Secondary containment (Spill Pallets) is free of liquid and in good physical condition	SAT / UNSAT / NA	SAT / UNSAT / NA		
4.1.9	Barricades (Chain, rope, fences, doors, etc.) AND postings (RAD postings, PCB marks, etc.) are intact and in good condition.	SAT / UNSAT	SAT / UNSAT / NA		
4.1.11	Check accessible surfaces of waste containers as follows: [TSR] <ul style="list-style-type: none"> <li>• Container not bulging</li> <li>• Containers free of physical damage</li> <li>• Containers free of corrosion</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	
4.1.12	No precipitation collected on drum lids with NucFill filters Note: Drums in hydrogen abatement period may not be covered.		SAT / UNSAT / NA		
4.1.13	Containers are stored in manner that precludes rupture, damage, or leakage AND containers are closed and show no evidence of leaks or spills	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	
4.1.14	Dangerous/hazardous waste containers are marked as dangerous or hazardous AND have major risk label, as applicable	SAT / UNSAT / NA	SAT / UNSAT / NA		

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Perform Weekly and Daily Surveillance of WMA's

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Appendix A (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	221-T Ops Gallery Storage	221-T Head End and Ramp	271-T Mezzanine Tank	Closed Waste Storage Areas
4.1.15	VERIFY Container ID number and other labeling & markings (e.g. Radioactive Material, Dose & Contamination values, Fissile Material, Fissile Material Content) are intact, unobscured, legible, and in good condition.	SAT / UNSAT / <del>NA</del>	SAT / UNSAT / <del>NA</del>		
4.1.16 thru 4.1.18	TSCA PCB waste: <ul style="list-style-type: none"> <li>Has PCB label</li> <li>Has "Remove from Service" date</li> <li>&lt; 180 days has passed since removed from service (does not apply to radioactive materials) [CFR]</li> </ul>	SAT / UNSAT / <del>NA</del>	SAT / UNSAT / <del>NA</del>	SAT / UNSAT / NA	
4.1.19	Incompatible waste is segregated	SAT / UNSAT / <del>NA</del>	SAT / UNSAT / <del>NA</del>		
4.1.20	Containers stored in rows are: <ul style="list-style-type: none"> <li>no more than 2 wide and not stacked</li> <li>&gt;36 inch wide spacing between rows [TSR; FHA]</li> </ul>		SAT / UNSAT / <del>NA</del>		
4.1.22	Verify drums listed on the current ACPM list are properly labeled, labels are intact, and drums are in a safe configuration,		SAT / UNSAT / <del>NA</del>		
4.1.25	INSPECT the following: <ul style="list-style-type: none"> <li>General housekeeping</li> <li>orphan container / unapproved waste accumulation</li> <li>Unpackaged waste</li> <li>Spills</li> </ul>	SAT / UNSAT	SAT / UNSAT / NA	SAT / UNSAT	

Perform Weekly and Daily Surveillance of WMA's

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Appendix A (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	221-T Ops Gallery Storage	221-T Head End and Ramp	271-T Mezzanine Tank	Closed Waste Storage Areas
4.1.26	VERIFY no Dangerous Waste OR Mixed Waste is present at the following WMAs under closure:				
	271-T Cage (Loading Dock)				SAT / UNSAT
	221-T Pipe Gallery Storage (Cage)				SAT / UNSAT
	211-T Pad				SAT / UNSAT
4.1.29	221-T Sand Filter Pad				SAT / UNSAT
	221-T R5 Waste Storage Area (including the 229W tent)				SAT / UNSAT
	277-T Building				SAT / UNSAT
	277-T Outdoor Storage Area				SAT / UNSAT
4.1.32	221-T Railroad Cut				SAT / UNSAT
	2706-TB Building				SAT / UNSAT
	Date of Inspection:	3-3-14	3-3-14	3-4-14	3-3-14
	Time of Inspection:	1445	1415	0930	1500
4.1.32	Inspector's Name (Printed):	LAWSON	LAWSON	LAWSON	LAWSON
	Inspector's Signature:	<i>LAWSON</i>	<i>LAWSON</i>	<i>LAWSON</i>	<i>LAWSON</i>
	(Ops Sup) All drums requiring venting are within the 30-Day clock OR No drums requiring venting are in the drum inventory [TSR]	(SAT) UNSAT	Completed by (Print/Sign/Date) <i>DE Richards</i> 3/4/14		



ENCLOSURE 4

RESPONSE TO ECOLOGY COMPLIANCE ISSUE 4  
COPY OF THE DO-040-016 PERFORM WEEKLY AND DAILY SURVEILLANCE OF  
WMA'S  
APPENDIX A – T PLANT WEEKLY WASTE MANAGEMENT AREA INSPECTION DATA  
SHEET  
FOR THE WEEK ENDING JULY 4, 2015

Consisting of 12 pages,  
Including this cover page

Perform Weekly and Daily Surveillance of WMA's

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Effective Date: 04/28/2014

Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pads	221-T Railroad Tunnel (Outdoor Storage area)
4.1.2	WMA free of transient combustible material [TSR]	SAT UNSAT	SAT UNSAT	SAT UNSAT	SAT / UNSAT	SAT UNSAT
4.1.3	Outdoor facility zones separated by ≥ 33 ft free of combustible material. [TSR]		SAT UNSAT / NA	SAT UNSAT / NA	SAT / UNSAT / NA	SAT UNSAT / NA
4.1.5	PCB, F020 thru F023, F026, F027, D001, & D003 waste on secondary containment	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.6	Secondary containment (Spill Pallets) is free of liquid and in good physical condition.		SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.7a	Containment system are free of cracks, gaps & deterioration	SAT UNSAT		SAT UNSAT		
4.1.7b	Containment systems free of liquid * 2706-T and TA sumps are exempt from this requirement	SAT UNSAT				
4.1.8	Containers are elevated or palletized		SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.9	Barricades (chain, rope, fences, doors, etc.) AND postings (Rad postings, PCB marks, etc.) are intact and in good condition	SAT UNSAT	SAT UNSAT	SAT UNSAT	SAT / UNSAT	SAT UNSAT
4.1.10	Waste accumulation containers secured AND an inventory is attached or immediately available.			SAT UNSAT / NA		

Perform Weekly and Daily Surveillance of WMA's

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Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706.f Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.11	Check accessible surfaces of waste containers as follows: [TSR] <ul style="list-style-type: none"> <li>• Container not bulging</li> <li>• Containers free of physical damage</li> <li>• Containers free of corrosion</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.12	No precipitation collected on drum lids with Nucfil filters Note: Drums in hydrogen abatement period may not be covered.		SAT / UNSAT / NA		SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.13	Containers are stored in manner that precludes rupture, damage, or leakage AND containers are closed & show no evidence of leaks or spills	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.14	Dangerous/hazardous waste containers are marked as dangerous or hazardous AND have major risk label, as applicable.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA

Perform Weekly and Daily Surveillance of WMA's

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Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.15	VERIFY Container ID number and other labeling & markings (e.g. Radioactive Material, Dose & Contamination values, Fissile Material, Fissile Material Content) are intact, unobscured, legible, and in good condition.	SAT / UNSAT / NA	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.16 Thru 4.1.18	TSCA PCB waste: <ul style="list-style-type: none"> <li>Has PCB label</li> <li>Has "Remove from Service" date</li> <li>&lt; 180 days has passed since removed from service (does not apply to radioactive materials) [CFR]</li> </ul>	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.19	Incompatible waste is segregated	SAT / UNSAT / NA	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.20	Containers stored in rows are: <ul style="list-style-type: none"> <li>no more than 2 wide and not stacked</li> <li>&gt;36 inch wide spacing between rows [TSR; FHA]</li> </ul>		SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.21	ACMP drums or drums requiring venting are protected from environmental conditions [TSR]	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA
4.1.22	VERIFY drums listed on the ACMP list are properly labeled, labels are intact, and drums are in a safe configuration.	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT NA	SAT / UNSAT / NA	SAT / UNSAT NA

Perform Weekly and Daily Surveillance of WMA's

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Appendix A - T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	HS-030 & HS-032 Storage Modules (2706-T Yard)	2706-T Yard	2706-T & TA Buildings and Outdoor Storage Areas	2706-T Asphalt Pad	221-T Railroad Tunnel (Outdoor Storage area)
4.1.23	If NFPA lab pack drums are present in the 2706-T facility: <ul style="list-style-type: none"> <li>No more than 16 lab packs are present in 2706-T Facility</li> <li>Lab Packs are only stored in 2706-TA.</li> </ul> [TSR; FHA]			SAT / UNSAT (NA)		
4.1.25	INSPECT the following: <ul style="list-style-type: none"> <li>General Housekeeping</li> <li>Orphan Containers/unapproved waste accumulation</li> <li>Unpackaged Waste</li> <li>Spills</li> </ul>			SAT UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.29	Date of Inspection: Time of Inspection: Inspector's Name (Printed): Inspector's Signature:	06/30/15 1200 PAEmerson <i>PAEmerson</i>	06/30/15 1400 PAEmerson <i>PAEmerson</i>	06/30/15 0700 PAEmerson <i>PAEmerson</i>	6-29-15 0745 PAEmerson <i>PAEmerson</i>	06/30/15 1430 PAEmerson <i>PAEmerson</i>

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Appendix A - (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	214-T Building	211-T Cage	221-T BY Storage (Boneyard)	243-T Covered Storage Pad
4.1.2	WMA free of transient combustible material [TSR]	SAT UNSAT	SAT UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.3	Outdoor facility zones separated by ≥ 33 ft free of combustible material. [TSR]		SAT UNSAT / NA	SAT / UNSAT / NA	
4.1.4	243-T facility zones separated by ≥ 20 ft free of combustible material. [TSR]				SAT / UNSAT / NA
4.1.5	PCB, F020 thru F023, F026, F027, D001, & D003 waste on secondary containment	SAT / UNSAT (NA)	SAT / UNSAT (NA)	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.6	Secondary containment (Spill Pallets) is free of liquid and in good physical condition	SAT UNSAT / NA	SAT / UNSAT (NA)	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.7a thru 4.1.7c	Containment system are free of cracks, gaps & deterioration	SAT UNSAT	SAT UNSAT		
	Containment systems free of liquid	SAT / UNSAT	SAT UNSAT		
	Accumulated precipitation in each sump is below 25%. * NOTIFY Supervisor if level is greater than 25%	SAT UNSAT	SAT UNSAT		
4.1.8	Containers are elevated or palletized	SAT UNSAT / NA	SAT / UNSAT (NA)	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.9	Barricades (chain, rope, fences, doors, etc.) AND postings (RAD postings, PCB marks, etc.) are intact and in good condition.	SAT UNSAT	SAT UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.10	Waste accumulation containers secured AND an inventory is attached or immediately available.	SAT UNSAT / NA		SAT / UNSAT / NA	
4.1.11	Check accessible surfaces of waste containers as follows: [TSR] <ul style="list-style-type: none"> <li>• Container not bulging</li> <li>• Containers free of physical damage</li> <li>• Containers free of corrosion</li> </ul>	SAT UNSAT / NA	SAT / UNSAT (NA)	SAT / UNSAT / NA	SAT / UNSAT / NA

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Appendix A - (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	214-T Building	211-T Cage	221-T BY Storage (Bohneyard)	243-T Covered Storage Pad
4.1.12	No precipitation collected on drum lids with NucFill filters <i>Note: Drums in hydrogen abatement period may not be covered.</i>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.13	Containers are stored in manner that precludes rupture, damage, or leakage AND containers are closed and show no evidence of leaks or spills	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.14	Dangerous/hazardous waste containers are marked as dangerous or hazardous AND have major risk label, as applicable	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.15	VERIFY Container ID number and other labeling & markings (e.g. Radioactive Material, Dose & Contamination values, Fissile Material, Fissile Material Content) are intact, unobscured, legible, and in good condition.	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.16 thru 4.1.18	TSCA PCB waste: <ul style="list-style-type: none"> <li>Has PCB label</li> <li>Has "Remove from Service" date</li> <li>&lt; 180 days has passed since removed from service (does not apply to radioactive materials) [CFR]</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.19	Incompatible waste is segregated	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.20	Containers stored in rows are [TSR; FHA]; <ul style="list-style-type: none"> <li>no more than 2 wide and not stacked</li> <li>&gt;36 inch wide spacing between rows</li> </ul>	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.21	Drums in the ACMP or drum requiring venting are protected from environmental conditions [TSR]	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA
4.1.22	Verify drums listed on the current ACMP list are properly labeled, labels are intact, and drums are in a safe configuration,	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA	SAT / UNSAT / NA

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Appendix A - (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	214-T Building	211-T Cage	221-T BY Storage (Bontyard)	243-T Covered Storage Pad
4.1.24	ENSURE the following controls are met for 243-T facility waste zones: <ul style="list-style-type: none"> <li>No combustible waste containers</li> <li>No open containers filled with waste</li> <li>No plastic spill pallets</li> </ul>				SAT / UNSAT / NA
4.1.25	INSPECT the following: <ul style="list-style-type: none"> <li>General housekeeping</li> <li>orphan container / unapproved waste accumulation</li> <li>Unpackaged waste,</li> <li>Spills</li> </ul>	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT	SAT / UNSAT
4.1.29	Date of Inspection: Time of Inspection: Inspector's Name (Printed): Inspector's Signature:	06/30/15 1430 PAEmerson PAEmerson	06/30/15 1500 PAEmerson PAEmerson	6-29-15 0700 Luisa Johnson Luisa Johnson	6-29-15 0730 Luisa Johnson Luisa Johnson

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Appendix A (Cont.) T Plant Weekly Waste Management Area Inspection Data Sheet

Step No.	Inspection Item	221-T Ops Gallery Storage	221-T Head End and Ramp	271-T Mezzanine Tank	Closed Waste Storage Areas
4.1.2	WMA free of transient combustible material [TSR]	SAT / UNSAT	SAT / UNSAT		
4.1.3	Outdoor facility zones separated by ≥ 33 ft free of combustible material. [TSR]		SAT / UNSAT / NA		
4.1.5	PCB, F020 thru F023, F026, F027, D001, & D003 waste on secondary containment	SAT / UNSAT (NA)	SAT / UNSAT / NA		
4.1.6	Secondary containment (Spill Pallets) is free of liquid and in good physical condition	SAT / UNSAT (NA)	SAT / UNSAT / NA		
4.1.9	Barricades (chain, rope, fences, doors, etc.) AND postings (RAD postings, PCB marks, etc.) are intact and in good condition.	SAT / UNSAT	SAT / UNSAT / NA		
4.1.11	Check accessible surfaces of waste containers as follows: [TSR] <ul style="list-style-type: none"> <li>• Container not bulging</li> <li>• Containers free of physical damage</li> <li>• Containers free of corrosion</li> </ul>	SAT / UNSAT (NA)	SAT / UNSAT / NA	SAT / UNSAT / NA	
4.1.12	No precipitation collected on drum lids with Nucfil filters Note: Drums in hydrogen abatement period may not be covered.		SAT / UNSAT / NA		
4.1.13	Containers are stored in manner that precludes rupture, damage, or leakage AND containers are closed and show no evidence of leaks or spills	SAT / UNSAT (NA)	SAT / UNSAT / NA	SAT / UNSAT / NA	
4.1.14	Dangerous/hazardous waste containers are marked as dangerous or hazardous AND have major risk label, as applicable	SAT / UNSAT (NA)	SAT / UNSAT / NA		

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Step No.	Inspection Item	221-T Ops Gallery Storage	221-T Head End and Ramp	271-T Mezzanine Tank	Closed Waste Storage Areas
4.1.15	VERIFY Container ID number and other labeling & markings (e.g. Radioactive Material, Dose & Contamination values, Fissile Material, Fissile Material Content) are intact, unobscured, legible, and in good condition.	SAT / UNSAT (NA)	SAT / UNSAT (NA)		
4.1.16 thru 4.1.18	TSCA PCB waste: <ul style="list-style-type: none"> <li>• Has PCB label</li> <li>• Has "Remove from Service" date</li> <li>• &lt; 180 days has passed since removed from service (does not apply to radioactive materials) [CFR]</li> </ul>	SAT / UNSAT (NA)	SAT / UNSAT (NA)	SAT / UNSAT / NA	
4.1.19	Incompatible waste is segregated	SAT / UNSAT (NA)	SAT / UNSAT (NA)		
4.1.20	Containers stored in rows are: <ul style="list-style-type: none"> <li>• no more than 2 wide and not stacked</li> <li>• &gt;36 inch wide spacing between rows [TSR; FHA]</li> </ul>		SAT / UNSAT (NA)		
4.1.22	Verify drums listed on the current ACMF list are properly labeled, labels are intact, and drums are in a safe configuration,		SAT / UNSAT (NA)		
4.1.25	INSPECT the following: <ul style="list-style-type: none"> <li>• General housekeeping</li> <li>• orphan container / unapproved waste accumulation</li> <li>• Unpackaged waste</li> <li>• Spills</li> </ul>	SAT / UNSAT	SAT / UNSAT / NA	SAT / UNSAT	

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Step No.	Inspection Item	221-T Ops Gallery Storage	221-T Head End and Ramp	271-T Mezzanine Tank	Closed Waste Storage Areas	
4.1.26	VERIFY no Dangerous Waste OR Mixed Waste is present at the following WMAs under closure:  271-T Cage (Loading Dock)  221-T Pipe Gallery Storage (Cage) 211-T Pad  221-T Sand Filter Pad  221-T RS Waste Storage Area (including the 229W tent)  277-T Building  277-T Outdoor Storage Area  221-T Railroad Cut  2706-TB Building					
					(SAT) UNSAT	
						(SAT) UNSAT
						(SAT) UNSAT
						(SAT) UNSAT
						(SAT) UNSAT
4.1.29	Date of Inspection: Time of Inspection: Inspector's Name (Printed): Inspector's Signature:	06/30/15	L-29-15	06/30/15	06/30/15	
		0630	0720	1330	1000	
		PAEmerson	PAEmerson	PAEmerson	PAEmerson	
		PAEmerson	PAEmerson	PAEmerson	PAEmerson	
4.1.32	(Ops Sup) All drums requiring venting are within the 30-Day clock OR No drums requiring venting are in the drum inventory [TSR]	(SAT) UNSAT	Completed by (Print/Sign/Date) Amy M... 6/30/15			

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Comments:	
INSPECTION FINDING	CORRECTIVE ACTION
4 SIGNS DOWN DUE TO WIND.	THEY WERE REHUNG. 6-29-15 WAF
OPEN ITEMS	DISPOSITION
① 214-T CRACKS in floor	① WORK PACKAGES IN PROCESS AM 6/30/15
Operations Supervisor (print/sign/date):	Frank Max Daily 6/30/15