

WSCF PMM Minutes for April 2012 held on May 10, 2012 at 2pm in the WDOE Office
 Attendees: Lee Fearon, Deborah Singleton, Rich Westberg, and Matt Mills

- ECO Discussion

1. Discuss implementation for SAA's in general

- MSA to provide to Ecology a "Checklist for Establishing a Satellite Accumulation Area" for each SAA in room(s) N-3 and N-5.
- M. Mills committed to send electronically the "Checklist for Establishing a Satellite Accumulation Area" for each SAA in room(s) N-3 and N-5. *Completed via email on 5/23/12.*
- L. Fearon and D. Singleton indicated that the "Checklist for Establishing a Satellite Accumulation Area" for each SAA in room(s) N-3 and N-5 provided in the PMM were in compliance with WAC 173-303. Ecology also indicated that the SAA Checklists had been reviewed by the Ecology Compliance Team and were determined to be compliant as well as relevant in supporting the September 2011 inspection.
- D. Singleton indicated that the "Checklist for Establishing a Satellite Accumulation Area" for each SAA in room(s) N-3 and N-5 should be placed in the April 2012 WSCF PMM Minutes for the Hanford Administrative Record.

2. How WSCF is meeting Ecology's concerns/agreements from the September 2011 inspection

- M. Mills committed to provide an update via email that captures all of the actions taken to date in support of the September 2011 inspection (RAID 2011-056). This update will capture: concern, response, implementation, and estimated time of completion. *Completed 3/6/2012 via email.*
- D. Singleton indicated that the Inspection Report provided on 3/6/2012 had been reviewed by Ecology and was sufficient in meeting Ecology's concerns associated with the September 2011 inspection (RAID 2011-056).
- D. Singleton indicated that the Inspection Report should be placed in the April 2012 WSCF PMM Minutes for the Hanford Administrative Record.



3. Request for analytical data in support of the radioactive liquid that was discovered on the ground near burial box 231-Z-DR-11 in the CWC Expansion Area (CHPRC).

- This agenda item was agreed to be removed.

- Analytical Updates

1. WSCF March 2012 "Flash Report".

- R. Westberg agreed to provide an updated "Flash Report" due to a typo.
- L. Fearon inquired about the specific pH from the associated instrument that supplied waste in N-5, SAA #2. L. Fearon would like to know the specific pH at the instrument.

- Significant impacts
 1. Work load has been reduced at the WSCF Lab due to funding and priorities. This has lead to a reduction in analytical services and a resulting work force reduction at the WSCF Lab.

- Administrative Record
 1. Draft March PMM minutes for review and approval.
 - March PMM minutes approved on 5/10/12.
 2. M. Mills has taken responsibility to ensure WSCF PMM minutes will be placed in the Hanford Administrative Record.
 3. It was agreed to by the attendees that the January – March meeting minutes would be re-signed to support placement in the Hanford Administrative Record during the May WSCF PMM.

Washington State Department of Ecology Approval of Meeting Minutes-

By  5/29/2012

Mission Support Alliance (MSA) Approval of Meeting Minutes-

By  5/29/12

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA

Location/Project/Activity: MSA/WSCF Laboratory (6266), Room N3, SAA #1	Responsible Level 3 Line Organization: MSA WSCF Analytical			
Description of Process Generating the Waste: This aqueous waste stream is expected to generate approximately 30 liters of waste per week from instrument #'s IC-405, IC-407, IC-408, IC-409, IC-410. A waste collection container is attached to each instrument at all times.				
Waste Description: This aqueous waste stream is an aggregated waste stream of eluent generated from the following methods: LA-533-400 "Determination Inorganic Ions in Sorbent Tube Leachate by IC", LA-533-403 "Inorganic Anions in Air using IC", and LA-533-410 "Anion Analysis by IC" basic 30 liters week.				
Waste Designation Information: This aqueous waste stream is designated as a D002 (pH 10-12) and F001-F005 (Hazardous Waste Liquid, N.O.S.).				
1. "AT or NEAR" the Point of Generation Where the Waste Initially Accumulates	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;">Yes</td> <td style="width: 33%; text-align: center;">No</td> <td style="width: 33%; text-align: center;">NA</td> </tr> </table>	Yes	No	NA
Yes	No	NA		
- Is the SAA in the same room where the waste is generated?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> </tr> </table>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
- If not, are there overriding safety or other concerns or is the waste generated from work performed in the field by maintenance or construction personnel?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> </tr> </table>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>		
- Is the SAA the initial accumulation point? (No two stage accumulation?) If not, the SAA must be placed at the initial accumulation point.	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> </tr> </table>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>		
Justification for being "AT or NEAR": The SAA is near the point of generation, collocated in the same room as generation. Each instrument is connected to it's own waste accumulation container. Full containers will be removed from the instrument and transferred to a designated shelf associated with the SAA.				
2. Compatibility	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;">Yes</td> <td style="width: 33%; text-align: center;">No</td> </tr> </table>	Yes	No	
Yes	No			
- Does a review of MSDSs or other references indicate that the waste described above can be accumulated in the same container?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input type="radio"/></td> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> </tr> </table>	<input type="radio"/>	<input checked="" type="radio"/>	
<input type="radio"/>	<input checked="" type="radio"/>			
- If not, how many separate accumulation containers are required? (Wastes that are physically or chemically different from each other; wastes that are to be generated from different types of processes; and wastes that are the same type, but are generated at different points along the same process or at different process locations may be considered separate waste streams.)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> </tr> </table>	<input checked="" type="radio"/>	<input type="radio"/>	
<input checked="" type="radio"/>	<input type="radio"/>			
Description of compatible accumulation container for each waste stream: The waste stream will be collected in HDPE/plastic containers made or lined with materials which will not react with, and are otherwise compatible with, the waste to be stored, so that the ability of the container to contain the waste is not impaired.				
3. Operator Control or Secured Container				
- Who is considered to be the operator of the process? Sue Kon, WSCF Director				
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;">Yes</td> <td style="width: 33%; text-align: center;">No</td> </tr> </table>	Yes	No	
Yes	No			
- Are administrative controls sufficient to prevent unauthorized additions of waste to the container?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> </tr> </table>	<input checked="" type="radio"/>	<input type="radio"/>	
<input checked="" type="radio"/>	<input type="radio"/>			
- Is the container located inside?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center;"><input checked="" type="radio"/></td> <td style="width: 33%; text-align: center;"><input type="radio"/></td> </tr> </table>	<input checked="" type="radio"/>	<input type="radio"/>	
<input checked="" type="radio"/>	<input type="radio"/>			
If the answer to either question above is "NO", provide a locked container or keep the container in a locked area.				

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA (continued)

4. Routine Operations	Yes	No
Will the waste be generated on a relatively continuous basis? If not, the waste must be managed in a satellite accumulation area in accordance with HNF-PRO-15333, Section 5.47.	<input checked="" type="radio"/>	<input type="radio"/>
5. Setup Place a check in each box when complete.		
• Container number assigned and marked on the Waste Container Record, Waste Container Log, and the accumulation container		<input checked="" type="checkbox"/>
• Container in good condition without significant corrosion or creases, seams are intact, and closure mechanism will properly seal		<input checked="" type="checkbox"/>
• Container marked with "Hazardous Waste" or "Dangerous Waste" and any additional Major Risk(s) as appropriate		<input checked="" type="checkbox"/>
• Container "AT or NEAR" as justified in #1 above		<input checked="" type="checkbox"/>
• Waste container log and/or sign near accumulation container clearly identifying the type of waste which may be placed in the container and indicates who to contact with any questions (see #2 above)		<input checked="" type="checkbox"/>
• Administrative controls in place or container secured (see #3 above)		<input checked="" type="checkbox"/>
• Container compatible with the waste to be accumulated		<input checked="" type="checkbox"/>
• Containers for accumulation of water-reactives free of water or similar materials		<input checked="" type="checkbox"/>
• No incompatible residues in previously used containers		<input checked="" type="checkbox"/>
• Secondary containment provided for containers accumulating liquid wastes if the SAA is adjacent to manholes, sewer grates, ditches, wetlands, surface water, drains, ponds, or within 152 meters of the Columbia River		<input checked="" type="checkbox"/>
• Environmental Compliance notified of established SAA		<input checked="" type="checkbox"/>
• Regulatory file and checklist prepared		<input checked="" type="checkbox"/>
Environmental POC Name: Mathison Mills ECO	Date: May 2012	
After completion, place this form in the regulatory file.		

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA

Location/Project/Activity: MSA/WSCF Laboratory (6266), Room N3, SAA #2	Responsible Level 3 Line Organization: MSA WSCF Analytical
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Description of Process Generating the Waste:
 This aqueous waste stream is expected to generate approximately 1 liter of waste a week from instrument #IC-406. A waste collection container is attached to each instrument at all times.

Waste Description:
 This aqueous waste stream is eluent generated from the following methods: LA-503-401 "Analysis of Cations by Ion Chromatography", and LA-633-400 "Inorganic Ammonia in Air".

Waste Designation Information:
 This aqueous waste stream is designated as a D002 (pH <2 - 4) and F001-F005 (Hazardous Waste Liquid, N.O.S.).

1. "AT or NEAR" the Point of Generation Where the Waste Initially Accumulates	Yes	No	NA
- Is the SAA in the same room where the waste is generated?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
- If not, are there overriding safety or other concerns or is the waste generated from work performed in the field by maintenance or construction personnel?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
- Is the SAA the initial accumulation point? (No two stage accumulation?) If not, the SAA must be placed at the initial accumulation point.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Justification for being "AT or NEAR":
 The SAA is near the point of generation, collocated in the same room as generation. Each instrument is connected to it's own waste accumulation container. Full containers will be removed from the instrument and transferred to a designated shelf associated with the SAA.

2. Compatibility	Yes	No
- Does a review of MSDSs or other references indicate that the waste described above can be accumulated in the same container?	<input checked="" type="radio"/>	<input type="radio"/>
- If not, how many separate accumulation containers are required? (Wastes that are physically or chemically different from each other; wastes that are to be generated from different types of processes; and wastes that are the same type, but are generated at different points along the same process or at different process locations may be considered separate waste streams.)	<input checked="" type="radio"/>	<input type="radio"/>

Description of compatible accumulation container for each waste stream:
 The waste stream will be collected in HDPE/plastic containers made or lined with materials which will not react with, and are otherwise compatible with, the waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Operator Control or Secured Container

- Who is considered to be the operator of the process? Sue Kon, WSCF Director

	Yes	No
- Are administrative controls sufficient to prevent unauthorized additions of waste to the container?	<input checked="" type="radio"/>	<input type="radio"/>
- Is the container located inside?	<input checked="" type="radio"/>	<input type="radio"/>

If the answer to either question above is "NO", provide a locked container or keep the container in a locked area.

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA (continued)

4. Routine Operations	Yes	No
Will the waste be generated on a relatively continuous basis? If not, the waste must be managed in a satellite accumulation area in accordance with HNF-PRO-15333, Section 5.47.	<input checked="" type="radio"/>	<input type="radio"/>
5. Setup Place a check in each box when complete.		
• Container number assigned and marked on the Waste Container Record, Waste Container Log, and the accumulation container	<input checked="" type="checkbox"/>	
• Container in good condition without significant corrosion or creases, seams are intact, and closure mechanism will properly seal	<input checked="" type="checkbox"/>	
• Container marked with "Hazardous Waste" or "Dangerous Waste" and any additional Major Risk(s) as appropriate	<input checked="" type="checkbox"/>	
• Container "AT or NEAR" as justified in #1 above	<input checked="" type="checkbox"/>	
• Waste container log and/or sign near accumulation container clearly identifying the type of waste which may be placed in the container and indicates who to contact with any questions (see #2 above)	<input checked="" type="checkbox"/>	
• Administrative controls in place or container secured (see #3 above)	<input checked="" type="checkbox"/>	
• Container compatible with the waste to be accumulated	<input checked="" type="checkbox"/>	
• Containers for accumulation of water-reactives free of water or similar materials	<input checked="" type="checkbox"/>	
• No incompatible residues in previously used containers	<input checked="" type="checkbox"/>	
• Secondary containment provided for containers accumulating liquid wastes if the SAA is adjacent to manholes, sewer grates, ditches, wetlands, surface water, drains, ponds, or within 152 meters of the Columbia River	<input checked="" type="checkbox"/>	
• Environmental Compliance notified of established SAA	<input checked="" type="checkbox"/>	
• Regulatory file and checklist prepared	<input checked="" type="checkbox"/>	
Environmental POC Name: Mathison Mills ECO	Date: May 2012	
After completion, place this form in the regulatory file.		

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA

Location/Project/Activity: MSA/WSCF Laboratory (6266), Room N5, SAA #1	Responsible Level 3 Line Organization: MSA WSCF Analytical
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Description of Process Generating the Waste:
 This waste stream is expected to generate approximately 8 liters of waste per week from the automated instrument(s). A waste collection container is attached to each instrument at all times.

Waste Description:
 This is an aggregated waste stream of eluent generated from LA-265-403, Hexavalent Chromium Analysis by Spectrophotometer or Discrete analyzer.

Waste Designation Information:
 This Waste Stream is designated as a D002, D007, and F001-F005. Major Risk- Corrosive/toxic.

1. "AT or NEAR" the Point of Generation Where the Waste Initially Accumulates	Yes	No	NA
- Is the SAA in the same room where the waste is generated?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
- If not, are there overriding safety or other concerns or is the waste generated from work performed in the field by maintenance or construction personnel?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
- Is the SAA the initial accumulation point? (No two stage accumulation?) If not, the SAA must be placed at the initial accumulation point.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Justification for being "AT or NEAR":
 The SAA is near the point of generation, collocated in the same room as generation. Each instrument is connected to it's own waste accumulation container. Full containers will be removed from the instrument and transferred to a designated shelf associated with the SAA.

2. Compatibility	Yes	No
- Does a review of MSDSs or other references indicate that the waste described above can be accumulated in the same container?	<input type="radio"/>	<input checked="" type="radio"/>
- If not, how many separate accumulation containers are required? (Wastes that are physically or chemically different from each other; wastes that are to be generated from different types of processes; and wastes that are the same type, but are generated at different points along the same process or at different process locations may be considered separate waste streams.)	<input checked="" type="radio"/>	<input type="radio"/>

Description of compatible accumulation container for each waste stream:
 The waste stream will be collected in HDPE/plastic containers made or lined with materials which will not react with, and are otherwise compatible with, the waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Operator Control or Secured Container		
- Who is considered to be the operator of the process? Sue Kon, WSCF Director		
	Yes	No
- Are administrative controls sufficient to prevent unauthorized additions of waste to the container?	<input checked="" type="radio"/>	<input type="radio"/>
- Is the container located inside?	<input checked="" type="radio"/>	<input type="radio"/>

If the answer to either question above is "NO", provide a locked container or keep the container in a locked area.

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA (continued)

4. Routine Operations	Yes	No
Will the waste be generated on a relatively continuous basis? If not, the waste must be managed in a satellite accumulation area in accordance with HNF-PRO-15333, Section 5.47.	<input checked="" type="radio"/>	<input type="radio"/>
5. Setup Place a check in each box when complete.		
• Container number assigned and marked on the Waste Container Record, Waste Container Log, and the accumulation container		<input checked="" type="checkbox"/>
• Container in good condition without significant corrosion or creases, seams are intact, and closure mechanism will properly seal		<input checked="" type="checkbox"/>
• Container marked with "Hazardous Waste" or "Dangerous Waste" and any additional Major Risk(s) as appropriate		<input checked="" type="checkbox"/>
• Container "AT or NEAR" as justified in #1 above		<input checked="" type="checkbox"/>
• Waste container log and/or sign near accumulation container clearly identifying the type of waste which may be placed in the container and indicates who to contact with any questions (see #2 above)		<input checked="" type="checkbox"/>
• Administrative controls in place or container secured (see #3 above)		<input checked="" type="checkbox"/>
• Container compatible with the waste to be accumulated		<input checked="" type="checkbox"/>
• Containers for accumulation of water-reactives free of water or similar materials		<input checked="" type="checkbox"/>
• No incompatible residues in previously used containers		<input checked="" type="checkbox"/>
• Secondary containment provided for containers accumulating liquid wastes if the SAA is adjacent to manholes, sewer grates, ditches, wetlands, surface water, drains, ponds, or within 152 meters of the Columbia River		<input checked="" type="checkbox"/>
• Environmental Compliance notified of established SAA		<input checked="" type="checkbox"/>
• Regulatory file and checklist prepared		<input checked="" type="checkbox"/>
Environmental POC Name: Mathison Mills ECO	Date: May 2012	
After completion, place this form in the regulatory file.		

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA

Location/Project/Activity: MSA/WSCF Laboratory (6266), Room N5, SAA #2	Responsible Level 3 Line Organization: MSA WSCF Analytical
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Description of Process Generating the Waste:
 This waste stream is expected to generate approximately 6 liters of waste per month from the automated instrument(s). A waste collection container is attached to each instrument at all times.

Waste Description:
 This is an aggregated waste stream of eluent generated from LA-695-402, Cyanide Determination by Mididistillation and Spectrophotometric Analysis.

Waste Designation Information:
 This Waste Stream is designated as D002 (pH 12.5) and D038. Major Risk- Corrosive/toxic.

1. "AT or NEAR" the Point of Generation Where the Waste Initially Accumulates	Yes	No	NA
- Is the SAA in the same room where the waste is generated?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
- If not, are there overriding safety or other concerns or is the waste generated from work performed in the field by maintenance or construction personnel?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
- Is the SAA the initial accumulation point? (No two stage accumulation?) If not, the SAA must be placed at the initial accumulation point.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Justification for being "AT or NEAR":
 The SAA is near the point of generation, collocated in the same room as generation. Each instrument is connected to it's own waste accumulation container. Full containers will be removed from the instrument and transferred to a designated shelf associated with the SAA.

2. Compatibility	Yes	No
- Does a review of MSDSs or other references indicate that the waste described above can be accumulated in the same container?	<input type="radio"/>	<input checked="" type="radio"/>
- If not, how many separate accumulation containers are required? (Wastes that are physically or chemically different from each other; wastes that are to be generated from different types of processes; and wastes that are the same type, but are generated at different points along the same process or at different process locations may be considered separate waste streams.)	<input checked="" type="radio"/>	<input type="radio"/>

Description of compatible accumulation container for each waste stream:
 Each of the two waste streams will be collected in HDPE/plastic containers made or lined with materials which will not react with, and are otherwise compatible with, the waste to be stored, so that the ability of the container to contain the waste is not impaired.

3. Operator Control or Secured Container		
- Who is considered to be the operator of the process? Sue Kon, WSCF Director		
	Yes	No
- Are administrative controls sufficient to prevent unauthorized additions of waste to the container?	<input checked="" type="radio"/>	<input type="radio"/>
- Is the container located inside?	<input checked="" type="radio"/>	<input type="radio"/>

If the answer to either question above is "NO", provide a locked container or keep the container in a locked area.

CHECKLIST FOR ESTABLISHING A SATELLITE ACCUMULATION AREA (continued)

4. Routine Operations	Yes	No
Will the waste be generated on a relatively continuous basis? If not, the waste must be managed in a satellite accumulation area in accordance with HNF-PRO-15333, Section 5.47.	<input checked="" type="radio"/>	<input type="radio"/>
5. Setup Place a check in each box when complete.		
• Container number assigned and marked on the Waste Container Record, Waste Container Log, and the accumulation container	<input checked="" type="checkbox"/>	
• Container in good condition without significant corrosion or creases, seams are intact, and closure mechanism will properly seal	<input checked="" type="checkbox"/>	
• Container marked with "Hazardous Waste" or "Dangerous Waste" and any additional Major Risk(s) as appropriate	<input checked="" type="checkbox"/>	
• Container "AT or NEAR" as justified in #1 above	<input checked="" type="checkbox"/>	
• Waste container log and/or sign near accumulation container clearly identifying the type of waste which may be placed in the container and indicates who to contact with any questions (see #2 above)	<input checked="" type="checkbox"/>	
• Administrative controls in place or container secured (see #3 above)	<input checked="" type="checkbox"/>	
• Container compatible with the waste to be accumulated	<input checked="" type="checkbox"/>	
• Containers for accumulation of water-reactives free of water or similar materials	<input checked="" type="checkbox"/>	
• No incompatible residues in previously used containers	<input checked="" type="checkbox"/>	
• Secondary containment provided for containers accumulating liquid wastes if the SAA is adjacent to manholes, sewer grates, ditches, wetlands, surface water, drains, ponds, or within 152 meters of the Columbia River	<input checked="" type="checkbox"/>	
• Environmental Compliance notified of established SAA	<input checked="" type="checkbox"/>	
• Regulatory file and checklist prepared	<input checked="" type="checkbox"/>	
Environmental POC Name: Mathison Mills ECO	Date: May 2012	
After completion, place this form in the regulatory file.		

5/8/12

**Waste Sampling and Characterization Facility (WSCF)
Responses to Questions from
Ecology/EPA Inspection on September 20, 2011
(RAID 2011-056)**

Question 1: MSA to explain how the liquid autosampler vials (which contain carbon disulfide) are designated. Ecology and EPA are concerned that these vials may be Acutely Hazardous Waste, and may be subject to the 1-quart maximum volume in a Satellite Accumulation Area (SAA).

Response:

The waste in question is not acutely hazardous waste. The vials are autosampler vials from the analysis of various organic constituents in which the carbon disulfide functions only as a carrier for the standards. After analysis the autosampler vials are collected and stored in a 1-gallon container in the SAA. In this specific case the carbon disulfide would not meet the definition of a commercial chemical product, i.e., the carbon disulfide is not the pure chemical, a technical grade of the chemical, or a sole active ingredient. The term sole active ingredient can be defined as an ingredient that is the only chemically active component for the function of the product, and therefore the carbon disulfide containing waste is not an acutely hazardous waste. Typically this waste stream is designated as a F001-F005, F039 listed waste due to the samples analyzed under the Ecology Memorandum of Understanding for derived in rule and is accumulated in accordance with the requirements of WAC 173-200.

WAC 173-303-040 "Definition": "Commercial chemical product refers to a chemical substance which is manufactured or formulated for commercial or manufacturing use which consists of the commercially pure grade of the chemical, any technical grades of the chemical that are produced or marketed, and all formulations in which the chemical is the sole active ingredient."

Question 2: MSA to address Ecology and EPA's concern regarding the adequacy of the current process for the collection of "in process" waste at the end of each work shift. The issue being that should an analysis be started at end of shift on a Friday/Holiday weekend, that accumulated waste could remain in the container over the weekend (essentially performing the role of an SAA) and would not be collected until the following scheduled workday.

Response:

WSCF has evaluated the adequacy of the current process for the collection of "in process" waste at the end of each work shift, specifically evaluating waste that could potentially be accumulated over the weekend of a holiday, therefore the container is essentially performing the role of a SAA.

It was determined and verified that routine ICP, TOC, Hexavalent Chromium, and Cyanide instrumentation is shut down for the weekend; therefore no waste is generated over the weekend and/or holidays. In some cases IC instruments are set to automatically shut off after hours, and would accumulate over the weekend. To ensure that waste is being accumulated properly, WSCF Waste Operations will put in place an action plan and schedule to add additional SAAs in the lab rooms where

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continuous waste streams are accumulated. The waste will be accumulating in a SAA until full, and then be transferred to a 90-day pad.

In the interim WSCF has limited instrument runs to day shift, and all non-routine processes are supported with Waste Operations staff for disposal to ensure waste is not accumulating over the weekend or a holiday. The continuous flow of instruments will be stopped by shutting down the instruments, therefore stopping the generation of waste. A schedule has been put in place to ensure that analytical staff complete waste pick up sheets on Friday afternoon and Waste Operations will pick up waste prior to the end of shift.

Implementation:

In support of Laboratory waste management activities and based on Ecology guidance (L. Fearon), WSCF has initiated a schedule to implement SAAs in each of the following lab rooms that contain automated instruments with containerized waste to maintain compliance with WAC 173-200:

- N-3, Implemented prior to January 30, 2012 committal date
- N-5, Implemented

Estimated time of completions:

N-3 and N-5 SAAs are currently in place.

Question 3: MSA to ensure that "suspect" PCB Samples, which are awaiting the PCB analysis data, are appropriately managed and labeled. This issue was raised by EPA; the PCB samples were marked with Hazardous Waste Labels, but were not in a SAA.

Response:

WSCF will perform Chlor-n-Oil/Chlor-n-Soil "Quick Tests" for PCB's on all oil/soil samples received requesting PCB analysis. These "quick tests" are used to identify the presence of PCBs at a specific action level (e.g., regulated concentration), but do not specify the actual PCB concentration. WSCF will use these "quick tests" to determine whether the sample is regulated under TSCA, and will not be used as a substitution of the actual analysis, but as a "screen" to assist the laboratory in determining how the sample/waste should be managed. The analytical sample results will be used to further determine the PCB concentration. This enhanced process will end the practice of managing these samples outside of an established SAA, while awaiting analytical results. This solution was accepted by EPA during the inspection.

Implementation:

WSCF has self-imposed the MSA Issue-Identification-Form (IIF) process to track and correct this concern. This has been assigned to the Analytical Lab Manager (R. Westberg) for tracking purposes and is scheduled to be complete by April 29, 2012. WSCF has procured both the Chlor-n-Oil and Chlor-n-Soil

5/8/12

“Quick Tests” for PCB’s and is currently working on a work-instruction sheet and training laboratory staff to implement the “Quick tests”.

Estimated time of completion:

Completed on April 26, 2012

Concern identified by Ecology in a letter (11-NWP-144) entitled “Dangerous Waste Generator Compliance Inspection at Waste Sampling Characterization Facility (WSCF) RCRA ID# WA 7890008967 on September 20, 2011” dated November 28, 2011.

“Reviewing the training records, the list of trainings provided for review had different “names of the training” rather than the requirements. Ecology spent a considerable amount of time reviewing the records just to understand and verify if the employee was trained to the training requirements. The names of the coursework taken in the training records should more concisely reflect the requirement.”

Response:

WSCF will update its “Dangerous Waste Training Plan” as well as verify that training records/requirements are clear and concise.

Implementation:

WSCF has self-imposed the MSA Issue-Identification-Form (IIF) process to track and correct this concern. This has been assigned to the ECO (M. Mills) for tracking purposes and is scheduled to be complete by April 29, 2012. WSCF will revise the Dangerous Waste Training Plan (DWTP) to incorporate the new course numbers and description update(s). Plus review the DWTP to ensure the appropriate training and course numbers are incorporated. Completion will include a revision to the “Dangerous Waste Training Plan” and a review of the training records.

Estimated time of completion:

Completed on April 26, 2012

**WASTE SAMPLING & CHARACTERIZATION FACILITY
March 2012 FLASH REPORT**

Manager: Rich Westberg

Date: April 18, 2012

I. ACCOMPLISHMENTS

Production Control

Industrial Hygiene (IH) Program

- Completed 341 asbestos analyses.
- Completed 347 Beryllium analyses.
- Completed 130 other analyses for site programs.

Other Analyses (Inorganic, Organic and RadChem)

- Completed 1254 analyses for S&GRP.
- Completed 98 analyses for ETF, TEDF 200, and TEDF 300 liquid operations.
- Completed 455 analyses for the Environmental Monitoring (EEM) program.
- Completed 104 analyses for other site customers.
- Completed 77 analyses for internal QA and waste disposal activities.

Sample Disposal

- Customer Pickup: 7 sample containers
- WSCF Disposal: 3274 sample containers

Turnaround Times

Non-Industrial Hygiene for March 2012

Reporting Interval	Groups Reported	Reported Early	Reported Late
FY-to-Date	769	665 (86%)	104 (14%)
Last 30 Days	114	114 (100%)	0 (0%)

Industrial Hygiene for March 2012

Reporting Interval	Groups Reported	Reported Early	Reported Late
FY-to-Date	354	316 (89%)	38 (11%)
Last 30 Days	93	93 (100%)	0 (0%)