



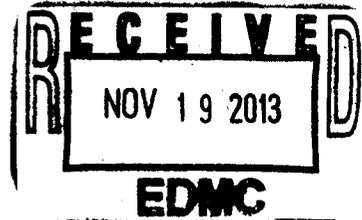
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 13, 2013

13-NWP-117

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352



Re: The Department of Ecology's (Ecology) Response to Notification TOC-ENV-NOT-2013-0071, Regarding Liquid found in Non-Resource Conservation and Recovery Act (RCRA)-Compliant, Deferred Use, Transfer Line SN-264 from Connector R14 of the 241-AW-B Valve Pit to Valve V-208 in the 241-AW-04A Pump Pit of the Double Shell Tank (DST) System

Dear Mr. Smith:

On September 19, 2013, the United States Department of Energy-Office of River Protection (USDOE-ORP) notified Ecology that liquid was found in Transfer Line SN-264 (Notification TOC-ENV-NOT-2013-0071). On October 22, 2013, Jeremy Johnson of your staff and Washington River Protection Solutions met with Ecology to discuss this notification.

SN-264 is a non-RCRA-compliant, deferred use line. It slopes down through a valve pit to SN-274, another non-RCRA-compliant deferred use line. The presence of liquid in a non-RCRA-compliant deferred use transfer line is a clear violation of the Washington Administrative Code (WAC) 173-303-400 (3)(a) (incorporating by reference 40 Code of Federal Regulations (CFR) 265.191, modified by WAC 173-303-400 (3)(ix)(C)). All DST system ancillary equipment must have a leak test, internal inspection or other tank system integrity examination, certified by an independent, qualified, registered professional engineer (IQRPE).

To avoid formal action, Ecology requires USDOE-ORP to pressure test transfer line (AW) SN-274. Once this line is certified by an IQRPE as fit for use, Ecology requires USDOE-ORP to drain the liquid from transfer line (AW) SN-264, back to 241-AW-104.

Ecology also requires USDOE-ORP to pressure test transfer lines (AW) SN-264 and SL-164. Ecology acknowledges that this will require a dangerous lift by a crane to remove the 241-AW-B's cover block to pressure test the lines and drain SN-264. Because USDOE-ORP has determined that liquids are present in a non-RCRA-compliant deferred use line, Ecology requires that these lines be certified by an IQRPE as fit for use, in accordance with 40 CFR 265.191 and 40 CFR 270.11(d)(1), modified by WAC 173-303-400(3)(ix)(C), to assure optimum flexibility, supporting on-going and future waste transfer operations:

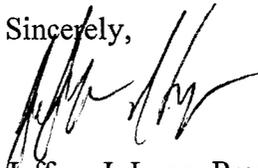
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Ecology requires USDOE-ORP to remove any liquid from these lines, as they are non-RCRA-compliant lines. Ecology expects USDOE to provide a schedule of the steps needed to complete this action to ensure USDOE-ORP will resolve this violation. Please submit the plan and schedule by December 15, 2013.

If you have any questions, please contact me at Jeffery.Lyon@ecy.wa.gov or (509) 372-7914, or Michelle Hendrickson, PE, at Michelle.Hendrickson@ecy.wa.gov or (509) 372-7970.

Sincerely,



Jeffery J. Lyon, Project Manager
Tank Systems Operation and Closure
Nuclear Waste Program

mh/tkb

cc electronic:

Dennis Faulk, EPA
Lisa Domnoske-Rauch, USDOE
Tom Fletcher, USDOE
Jeremy Johnson, USDOE
James Hamilton, WRPS
Steve Killoy, WRPS
Jeff Voogd, WRPS
David Bernhard, NPT
Dirk Dunning, ODOE
Ken Niles, ODOE
John Martell, WDOH
John Schmidt, WDOH
Michelle Hendrickson, Ecology

cc:

Stuart Harris, CTUIR
Alex Nazarali, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Steve Hudson, HAB
Administrative Record: ✓
DST/TWS/241-AW-104/S-2-3
Environmental Portal
USDOE-ORP Correspondence Control
WRPS Correspondence Control