



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 22, 2016

16-NWP-040

By certified mail

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

Mr. Mark Lindholm
President and Project Manager
Washington River Protection Solution, LLC
PO Box 850, MSIN: H3-21
Richland, Washington 99352

Re: Dangerous Waste Compliance Inspection on July 28, 2015 at the Hanford Site Single-Shell Tank System – Generator Activities, Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.545

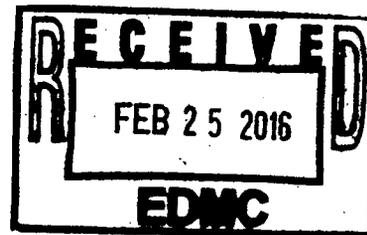
Dear Mr. Smith and Mr. Lindholm:

Thank you for your staff's time during the Department of Ecology's (Ecology) compliance inspection. The purpose of our inspection was to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 Washington Administrative Code), at the Single-Shell Tank System – Generator Activities. The regulations establish a system for safe and responsible management of dangerous waste.

Ecology's compliance report for the Single-Shell System – Generator Activities inspection is enclosed. This report cites two areas of non-compliance with the Dangerous Waste Regulations and four areas of concern. The areas of non-compliance and the actions required for a return to compliance are listed in the Compliance Problems section of the report.

To return to compliance, complete the actions required and respond to Ecology within the specified timeframes of receipt of the compliance report. Include all supporting documentation such as photographs, records, and statements explaining the actions taken and dates a return to compliance was completed. Submit the above paperwork along with any requested documentation, to me at 3100 Port of Benton Boulevard, Richland, Washington 99354.

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



Mr. Smith and Mr. Lindholm
February 22, 2016
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16-NWP-040
Single-Shell System – Generator Activities
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 15.545
Inspection Date: July 28, 2015

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

Sincerely,



Edward Holbrook
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tkb
Enclosure

cc electronic w/enc:

Dave Bartus, EPA
Jack Boller, EPA
Dennis Faulk, EPA
Gae Neath, USDOE-ORP
Bryan Trimmerger, USDOE-ORP
Cliff Clark, USDOE-RL
Allison Wright, USDOE-RL
Michael Greene, WRPS
Jessica Joyner, WRPS
Doug Swenson, WRPS
Jeff Voogd, WRPS
Jon Perry, MSA
Ken Niles, ODOE
Debra Alexander, Ecology
Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
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Edward Holbrook, Ecology
Jeff Lyon, Ecology
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Cheryl Whalen, Ecology
Environmental Portal
Hanford Facility Operating Record
WRPS Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record
NWP Central File
NWP Compliance Index File: 15.545

cc w/o enc:

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

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

Site: Single Shell Tank System – Generator Activities
RCRA Site ID: WA7890008967
Inspection Date: July 28, 2015
Site Contacts: Dan Crawford, Washington River Protection Solutions LLC (WRPS)
Gae Neath, United States Department of Energy (USDOE)
Phone: (509) 372-3635 – Dan Crawford
FAX: N/A
Site Location: Hanford Site (200 West and 200 East Area)
Benton County, WA
At This Site Since: 1943 **NAICS#:** 56221, 924110, and 54171
Current Site Status: Large Quantity Generator
Compliance Index #: 15.545

Ecology

Lead Contact: Edward Holbrook **Phone:** (509) 372-7909 **FAX:** (509) 372-7971

Other Representatives: Jared Mathey (Support Inspector)

Report Date: February 18, 2016

Report By: Edward Holbrook



(Signed)

2/18/16

(Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource Conservation and Recovery Act of 1976 (RCRA) facility, even though the Hanford Site contains numerous processing areas spread over a large geographic area. The Hanford Site is approximately a 586-square-mile tract of land located in Benton County, Washington. It is divided into a number of dangerous waste management units (DWMUs) that are administratively organized into "unit groups." A unit group may contain only one DWMU or many. Currently, there are 37 unit groups at the Hanford Site. DWMUs use only a few small portions of the Hanford Site. Additional descriptive information on the DWMUs is contained in unit group permit applications and in Parts III, V, and VI of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, WA78900008967, Revision 8C* (hereafter referred to as the Permit). The locations to be documented in this compliance report are associated with the Single Shell Tank (SST) System, Closure Unit Group 4. The locations are less than 90 day accumulation areas (90 Day Areas), where both dangerous waste (DW) and mixed waste (MW), from the SST System, are accumulated.

Owner/Operator Information

The United States Department of Energy (USDOE) is the owner and operator of the SST System and oversees waste management and cleanup activities ongoing at the Hanford Site. WRPS is contracted by the USDOE to co-operate the SST System and generator accumulation activities.

Facility Background

A detailed description of the SST System can be found in the Washington State Department of Ecology Nuclear Waste Program (Ecology) Compliance Report (Compliance Index No. 15.518) for the inspection conducted on March 30-31, 2015. The activities, which include, but are not limited to the storage of MW, retrievals and transfers of MW, and the management of the following SST System tanks and ancillary equipment, contribute to the generation of DW and MW.

- 133 – 100-series SSTs (2 to 3.8 million liter [530,000 to 1 million gal] capacity)
- 16 – 200-series SSTs (200,000 liter [55,000 gal] capacity)
- Waste transfer vaults and associated miscellaneous underground storage tanks
- Tank pits, valve pits, and flush pits
- Pumps and valves
- Diversion boxes and diverter stations
- Numerous pipelines
- Other mechanical equipment
- Contaminated soils for purposes of closure and corrective action
- Contaminated groundwater for purposes of closure and corrective action

According to the *Tank Operations Contractor – SAA and <90 Day Accumulation Area Locations* list, dated May 8, 2015, the following 90 Day Areas were associated with the SST System generator activities.

Number	Area	Location	Predominant Waste Type
1	200 East	241-A Tank Farm	90 Day Area – Mixed Waste
2	200 East	241-AX Tank Farm	90 Day Area – Mixed Waste
3	200 East	241-B Tank Farm	90 Day Area – Mixed Waste
4	200 East	241-BX Tank Farm	90 Day Area – Mixed Waste
5	200 East	241-BY Tank Farm	90 Day Area – Mixed Waste
6	200 East	241-C Tank Farm	90 Day Area – Mixed Waste
7	200 West	241-S Tank Farm	90 Day Area – Mixed Waste
8	200 West	241-SX Tank Farm	90 Day Area – Mixed Waste
9	200 West	241-T Tank Farm	90 Day Area – Mixed Waste
10	200 West	241-TX Tank Farm	90 Day Area – Mixed Waste
11	200 West	241-TY Tank Farm	90 Day Area – Mixed Waste - Suspended
12	200 West	241-U Tank Farm	90 Day Area – Mixed Waste

The location term “Tank Farm” is commonly used for a group of underground storage tanks, which are located in the 200 West Area or the 200 East Area. Generally the DW and MW generated and accumulated at these tank farm 90 Day Areas is transferred to the 616 Building, which is a 90 Day Area for receiving and consolidating DW and MW before the waste is prepared for shipment to a Treatment, Storage, and Disposal Facility or the Environmental Restoration Disposal Facility (ERDF). Below are the two types of wastes received at the 616 Building.

Number	Area	Location	Predominant Waste Type
1	600 East	616 Building	90 Day Area – Mixed Waste
2	600 East	616 Building	90 Day Area – Dangerous Waste

The 616 building is located between the 200 West and 200 East Areas and is accessible by Route 3 that travels between the west and east areas. The 616 building is also directly across the road from the Hanford Fire Department (Building 609A).

Inspection Summary

On July 28, 2015 at 8:05 a.m. Mr. Mathey and I arrived at the 2750 building. At 8:10 a.m. we introduced ourselves. Dan Crawford (WRPS Regulatory Inspection Coordinator) provided a safety briefing. I described that the purpose for the inspection of generator activities associated with the SST System was to ensure compliance with Washington Administrative Code (WAC) 173-303. I also explained that Mr. Mathey and I would be conducting a field inspection, personnel interviews, and a document review. The following personnel were present during the in-briefing.

- Annie McLain – WRPS Environmental Compliance
- Chuck Mulkey – WRPS Environmental Program
- Dan Crawford – WRPS Environmental Regulatory Inspection Coordinator
- Doug Swenson – WRPS Waste Services
- Jeff Voogd – WRPS Environmental Compliance
- Gae Neath – USDOE Office of River Protection (USDOE-ORP) Environmental Representative
- Glen Triner – WRPS Waste Services
- Greta Davis – WRPS Environmental Compliance
- Steve Davis – WRPS Training Representative

I asked if the SST System generates spent antifreeze, used oil, or recyclables. Mr. Swenson said it is possible but not likely. I asked where spent antifreeze, used oil, or recyclables would be accumulated, if generated at the SST System. Mr. Swenson said they would be accumulated at the Centralized Consolidation and Recycling Center (CCRC). I asked if the SST System generates universal waste (UW). Mr. Swenson said UW is accumulated at the 616 building and transferred to CCRC periodically.

I asked if the SST System generates DW or MW. Mr. Swenson said the following tank farms were generating DW or MW.

- 241-A Tank Farm
- 241-AX Tank Farm
- 241-BX Tank Farm
- 241-BY Tank Farm
- 241-C Tank Farm
- 241-S Tank Farm
- 241-SX Tank Farm
- 241-T Tank Farm
- 241-TX Tank Farm
- 241-U Tank Farm

Mr. Swenson said Stericycle Inc. receives monthly shipments of DW from the SST System, 222-S Laboratory, Waste Treatment Plant, and the 616 building. Mr. Swenson said MW could be shipped directly from the tank farm 90-Day Areas or the 90-day areas at 616 building, depending on the size of

the container. He said MW would either be shipped to PermaFix Northwest or the Hanford Environmental Restoration Disposal Facility. Mr. Triner said containers of MW would be shipped to 222-S Laboratory (Operating Unit Group 8), if the MW was going to be shipped to PermaFix East for treatment.

I asked about inspection types and frequencies associated with the 90-Day Areas. Mr. Swenson said inspections follow technical procedure TO-100-045 (*Inspect Waste Pad Areas and Active Containers*). I said I would request a copy of the technical procedure.

I asked if there have been any spills of DW/MW within the last two years. Mr. Triner said there were no spills of DW/MW, but said there have been small spills of diesel. I reviewed the spill log for generator activities and observed no spills of DW/MW.

I asked if the contingency plan has been implemented within the last two years. Mr. Swenson answered no. I also asked if the *Building Emergency Plan for Tank Farms RPP-27869, Revision 6*, dated May 13, 2014, is used for spill and emergency events. Mr. Mulkey said yes and also stated that this is the same building emergency plan the SST System uses. I asked who the emergency coordinator on duty is today. Mr. Voogd said Ryan Maygra is on duty for the day shift and Kyle Beaulaurier is on duty for the night shift.

I asked if any 90-Day Areas associated with the SST System have closed within the last two years. Mr. Swenson said none of the 90-Day Areas have closed, instead they have been suspended, pending anticipated use.

I asked if there are any treatment by generator activities currently taking place in the 90-Day Areas. Mr. Swenson and Mr. Triner said no treatment by generator activities are being conducted in the Tank Farm 90-Day Areas or the 616 building 90-Day Areas.

I asked if the *Dangerous Waste Training Plan (DWTP), TFC-PLN-09, Revision B*, dated July 28, 2010, is the same training plan used for all SST System personnel. Mr. Voogd answered yes. I did not conduct a review of the DWTP, TFC-PLN-09. Refer to Compliance Report (Compliance Index No. 15.518) for observations associated with the DWTP and training records.

At 9:05 a.m. we began the field inspection near the 241-A Tank Farm. The 90-Day Area was within a fence line of what appeared to be the 241-AY Tank Farm fence line, which is associated with the Double Shell Tank (DST) System. The 241-AY Tank Farm is adjacent to the 241-A Tank Farm. From a closed gate, I observed three containers (two drums and one large box). The two drums were surrounded on three sides by metal barriers with one side closed off by a chain. With a pair of binoculars, I observed signs on the chain, which appeared to state "90-Day Accumulation Area." The large box I observed, appeared to be in a separate designated section adjacent to the 90-Day Area. I requested the inventory log since I could not clearly identify the labels on the containers or the contents.

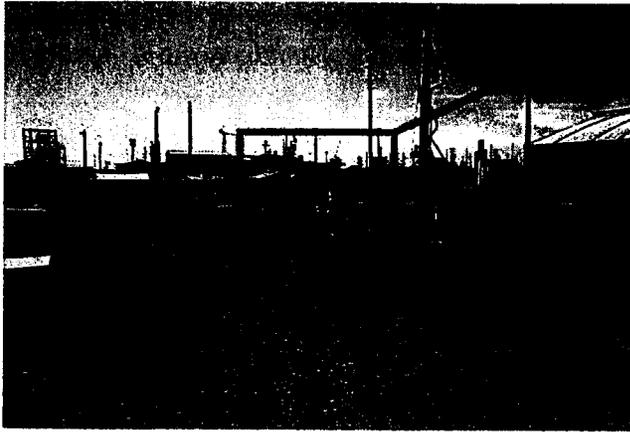


Photo 1: 241-A Tank Farm 90 Day Accumulation Area

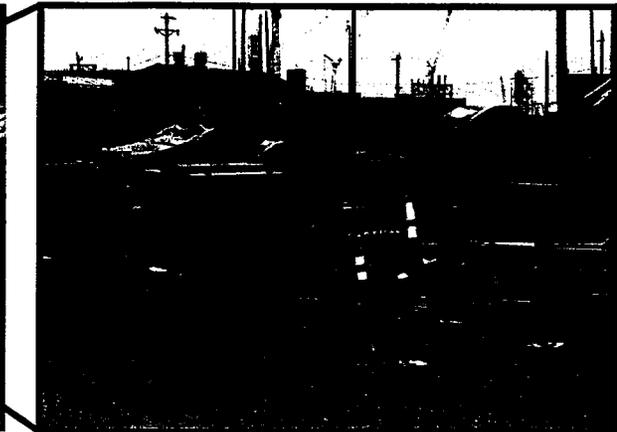


Photo 2: 241-A Tank Farm 90 Day Accumulation Area

Note: Due to entrance restrictions (i.e. respirator requirements and training) I did not access any Tank Farm fence lines. I was able to observe most containers in detail, by using binoculars. I also requested photographs of containers I was not able to clearly observe.

I observed in the *Tank Farm Waste Containers, In the Field* inventory list (Tank Farm Container Inventory), dated July 27, 2015, only one container was attributed to the 241A Tank Farm. The Tank Farm Container Inventory provides columns for the following information.

- Facility
- Package Identification Number (PIN)
- Container Identification Number (CIN)
- Location Detail
- Dangerous
- Radioactive
- Size
- Accumulation Date
- Age
- Requester
- Comments

I observed that container (CIN: 0089903) was the one container on the inventory for 241-A Tank Farm. I observed the container was identified as Low Level Waste (LLW) and was marked “N” for “DNGR,” which would indicate the container’s contents is characterized as LLW.

I observed in the Tank Farm Container Inventory, for 241-AY Tank Farm, three containers with MW contents and six containers with LLW contents. The three MW containers had the following information, which I have documented below, in part.

Facility	CIN	Location Detail	Dangerous	Radioactive	Size	Accumulation Date	Age	Comment
241AY	0091355	90	Y	LLW	9*5*5	7/24/15	4	N/A
	0991277	90	Y	LLW	30 Gal	N/A	6	N/A
	WTS-15-159-03	90	Y	LLW	6*2*2	6/10/15	48	Delivered to Gate 8.

Other information such as the PIN and requester can be found on the Tank Farm Container Inventory. I could not clearly verify if these containers are the containers I observed in the 90-Day Area (Photo 1 and Photo 2). I also could not clearly identify if the 90-Day Area, serves the 241-A Tank Farm, 241-AY Tank Farm, or both. According to the *Tank Operations Contractor – SAA and <90 Day Accumulation Area Locations* list, dated May 8, 2015, there is a 90-Day Area listed for the 241-AY Tank Farm and

another for the 241-A Tank Farm. There appears to be discrepancies between the physical location and the configuration of 90-Day Areas in the field with what is described in the *Tank Operations Contractor – SAA and <90 Day Accumulation Area Locations* document.

I observed from the inventory list that container (CIN: 0991277) does not have an accumulation start date and has been at 241-AY for six days. During the field inspection, Mr. Swenson said the container's "age" is tracked from the day it is issued to a tank farm. I was also told that once the first volume of waste was placed in a container, an accumulation start date would be documented. I observed containers (CIN: 0091355 and CIN: WTS-15-159-03) both had accumulation start dates, which were July 24, 2015, for CIN: 0091355 and June 10, 2015, for CIN: WTS-15-159-03. I also observed the age of both containers appeared to be associated with the accumulation date and the date this inventory was last updated.

At 9:33 a.m. we arrived at a gate on the west side of the 241-AZ and 241-AN Tank Farms. The gate was open and access was controlled. A gravel road appeared to be located along the boundary that 241-AZ Tank Farm and 241-AN Tank Farm share. Both the 241-AZ and 241-AN Tank Farms are a part of the DST System. Mr. Swenson said the gate and road are used to access the 241-AZ and 241-AX Tank Farms. The 241-AX Tank Farm is a part of the SST System. Mr. Swenson also said that the 241-AZ and 241-AX Tank Farms share the 90-Day Area identified in Photo 3. I observed the 90-Day Area was within a fence line just beyond the open gate. I observed approximately 15 containers from the gate, but could not clearly verify if the containers were MW or LLW. Mr. Swenson showed Mr. Mathey and me an example of how empty containers are issued to a tank farm. The empty container was located to the right of the gate. I observed the container was upside down and had a plastic adhesive package adhered to the side of the container. Inside the package I observed a hazardous waste label, a major risk label, and an accumulation log. Mr. Swenson said the empty container has been predetermined by the generator's request to accumulate a waste generated at the tank farm.



Photo 3: 241-AZ and 241-AX Tank Farms 90 Day Area

With the binoculars, I was able to observe four identification numbers, which were TFP-15-190-04 (Accumulation Date: July 22, 2015), TFP-15-190-05 (Accumulation Date: July 17, 2015), TFP-15-190-02 (Accumulation Date: July 17, 2015), and what appeared to be BOP-15-160-03. When I compared the identification number with the Tank Farm Container Inventory I observed the following.

Facility	PIN	Location Detail	Dangerous	Radioactive	Size	Accumulation Date	Age	Comment
241-AZ	TFP-15-190-02	90	Y	LLW	208 Liter	7/17/15	11	Located in Corridor 8.
	TFP-15-190-04	90	Y	LLW	208 Liter	N/A	12	Located in Corridor 8.
	TFP-15-190-05	90	Y	LLW	208 Liter	7/17/15	11	Located in Corridor 8.
	BOP-15-168-03	LLW	N	LLW	208 Liter	6/25/15	33	N/A

The identification numbers I observed on the four containers were PINs associated with MW and LLW generated in the 241-AZ Tank Farm, which is a DST System. I also observed on the Tank Farm Container Inventory that container TFP-15-190-04 had no accumulation date documented, but during the field inspection I observed the accumulation date written on the container as July 22, 2015.

At 9:50 a.m. we arrived at the 241-C Tank Farm 90-Day Area. I observed the 90-Day Area outside of the fence line was on the northeast side of the 241-C Tank Farm. I did not observe MW containers staged in the 90-Day Area. I did observe one container (CIN: 0090558) with LLW contents. When I compared the Tank Farm Container Inventory with what I observed during the field inspection, I observed the following.

Facility	PIN	Location Detail	Dangerous	Radioactive	Size	Accumulation Date	Age
241-C	TFP-14-303-03	90	Y	LLW	20*8*5	6/22/15	36
	TFP-15-126-08	90	Y	LLW	9*5*5	5/19/15	70
	TFP-15-161-01	90	Y	LLW	60*5*5	5/28/15	61
	WTS-15-146-01	90	Y	LLW	3*2*2	N/A	14
	TFP-15-141-02	90	Y	LLW	40*5*5	5/20/15	69

I did not observe the five containers documented on the Tank Farm Container Inventory within the designated 241-C Tank Farm 90-Day Area. I asked about the location of the containers not observed in the 90-Day Area. Mr. Triner said the containers were within the 241-C Tank Farm fence line. I asked Mr. Triner, if he could explain the process of accumulating MW and the transfers from within the fence line to 90-Day Areas outside the fence line. Mr. Triner said containers would remain in the tank farm until the container was full or until the job generating the waste was completed. Mr. Triner said the container would be placed near the point of generation. Mr. Triner also said the waste services organization would push to have containers transferred out of the tank farm after 45 days have passed however, typically containers would remain at the tank farm and 90-Day Area for approximately 60 days.

I observed from the Tank Farm Container Inventory, the following comments associated with the containers below.

- TFP-14-303-03 – *Shipment #TF1867. Treatment by macroencapsulation at ERDF. PCB remediation waste with 0.00132 PPM total PCB (Normalized). RO/RO Container # 754.*
- TFP-15-161-01 – *Shipment # TF1861. Treatment by macroencapsulation at ERDF. PCB remediation waste with 0.00011 PPM total PCB (Normalized).*
- TFP-15-141-02 – *Shipment #TF1860. Treatment by macroencapsulation at ERDF. Actual size of the waste container is 40'X5'X5'.*

At 10:02 a.m. we arrived at the 241-B, 241-BX, and 241-BY Tank Farms. The 90-Day Area for the three tank farms are consolidated into one 90-Day Area, located on the east side of the 241-BX Tank Farm. I observed one container (Photo 4) with the following labels.

- 90 Day Accumulation Container
- Accumulation Date: June 17, 2015
- CIN: 0089805
- PIN: BOP-14-286-14
- Hazardous Waste
- Toxic



Photo 4: 241-B, 241-BX, and 241-BY Tank Farms 90 Day Area

I also observed two LLW labeled containers adjacent to the area where the MW container (Photo 4 and Photo 5) was located. The MW container (CIN: 0089805) matched the Tank Farm Container Inventory.



Photo 5: 241-B, 241-BX, and 241-BY Tank Farms 90 Day Area

At 10:25 a.m. we arrived at the 241-T Tank Farm 90-Day Area. The 90-Day Area is located on the north side of the 241-T Tank Farm and is located inside and adjacent to the fence line. I observed no containers in the 241-T Tank Farm 90-Day Area. I asked about the location of emergency equipment that would be used at the SST System 90-Day Areas. Mr. Triner said the emergency equipment is located in the change trailers associated with each tank farm. I asked who inspects the container in the

90-Day Area and how containers located inside the fence line are inspected. Mr. Triner said waste service personnel from the 616 building conduct the inspections of MW containers. He said containers inside the fence line are visually inspected from outside the fence line. He also said if the containers inside the fence line cannot be seen, the personnel from the 616 building will enter the tank farm to inspect the container.

Note: The process described for inspecting containers within the SST System fence line was corrected and documented later in this report.

At 10:35 a.m. we arrived at the west side of the 241-TX and 241-TY Tank Farms. Both tank farms are a part of the SST System. I did not observe containers labeled as MW staged in the 90-Day Area on the west side of the 241-TX Tank Farm. The 90-Day Area is inside and adjacent to the fence line on the west side of 241-TX Tank Farm. The Tank Farm Container Inventory did not document any MW containers associated with the 241-TX and 241-TY Tank Farms.

At 10:44 a.m. we arrived at the 241-U Tank Farm 90-Day Area. The 90-Day Area is located on the west side of the 241-U Tank Farm, near the change trailer, MO-297. I observed one 10 gallon container with the identification number BOP-15-154-01, which according to the Tank Farm Container Inventory list is a LLW container. I also observed seven large totes, which are also identified as LLW according to the Tank Farm Container Inventory list. I did not observe MW waste containers being staged in the 90-Day Area. I did observe the following on the Tank Farm Container Inventory list.

Facility	CIN	Location Detail	Dangerous	Radioactive	Size	Accumulation Date	Age
241-U	0091361	90	Y	LLW	9*5*5	5/30/15	59

I did not observe the container (0091361) near or at the 90-Day Area for the 241-U Tank Farm (Photo 6).



Photo 6: 241-U Tank Farm 90 Day Area

At 10:58 a.m. we arrived at a 90-Day Area on the east side of 241-SY Tank Farm. The 241-SY Tank Farm is a part of the DST System. I observed the 90-Day Area is located outside of the fence line. I observed three containers labeled as MW staged in the 90-Day Area (Photo 7). I also observed one container inside the fence line approximately 20 feet from the east side gate. The container had the following labels (Photo 8).

- 90 Day Accumulation Container

- Accumulation Date: July 28, 2015
- CIN: 0089653
- PIN: WTS-15-104-04
- Hazardous Waste
- Toxic

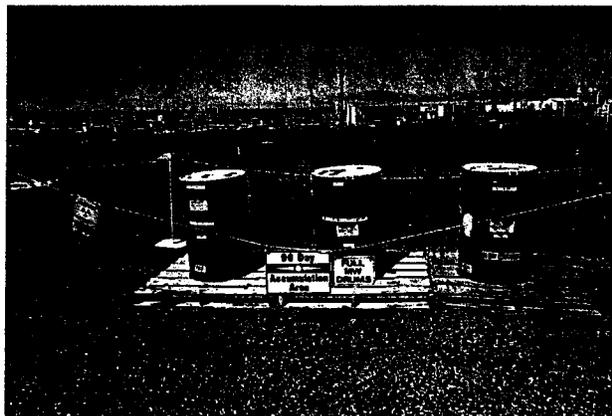


Photo 7: 241-SY Tank Farm 90 Day Area



Photo 8: 241-SY Tank Farm Container (CIN: 0089653)

At 11:10 a.m. we arrived at the 90-Day Area on the west side of the 241-SX Tank Farm. The 241-SX Tank Farm is a part of SST System. I observed the 90-Day Area is outside the fence line of the 241-SX Tank Farm. I also observed one LLW labeled container (CIN: 0091177) and one MW labeled container (PIN: TFP-14-227-10 and CIN: 0086574) staged in the 90 Day Area (Photo 9).

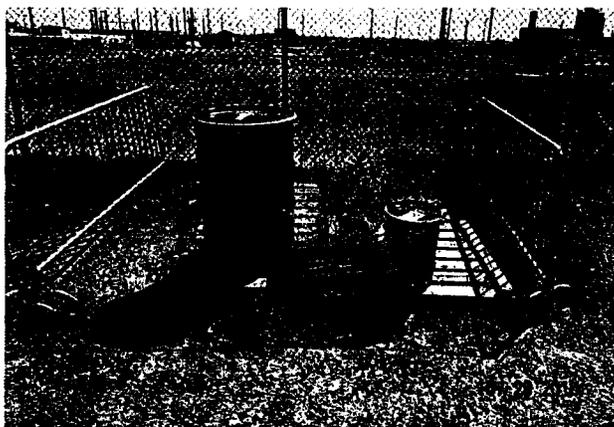


Photo 9: 241-SX Tank Farm 90 Day Area

The Tank Farm Container Inventory list states the following regarding the containers observed above (Photo 9) and other MW containers not observed within the 90-Day Accumulation Area.

Facility	CIN	Location Detail	Dangerous	Radioactive	Size	Accumulation Date	Age
241-SX	TFP-14-227-09	90	Y	LLW	85 Gal.		340
241-SX	TFP-14-227-10	90	Y	LLW	85 Gal.	7/13/15	15
241-SX	0091176	LLW	N	LLW	10 Gal.	6/08/15	50

I did not observe the container (CIN: TFP-14-227-09) at the 90 Day Area. I did observe the CIN on the LLW container (CIN: 0091177) is different from the CIN documented in the Tank Farm Container

Inventory (CIN: 0091176). When I looked at the container numbers on the Tank Farm Container Inventory list for 241-SY I observed LLW container (CIN: 0091177). It is not clear why the LLW Container (CIN:0091177) is located within this 241-SX Tank Farm 90-Day Area, considering the Tank Farm Container Inventory list documents the container as being in the 241-SY Tank Farm. It is also not clear where the LLW container (CIN: 0091176) is located.

The use of 90-Day Areas in the SST System is unclear, making it difficult to determine compliance with the generator requirements. There appears to be no required location inside or outside the fence line where containers are to be staged and accumulated. There only appears to be areas that should be used to accumulate DW and MW, which are labeled 90-Day Accumulation Areas. This distinction is also vague when it comes to establishing 90-Day Areas for generating activities at DWMUs in the SST System or the DST System. Finally, the use of established waste accumulation areas inside and outside the fence line for any given Single Shell Tank Farm as a 90-Day Accumulation Area rather than establishing what appears to be (and more appropriate) satellite accumulation areas, has made it difficult to complete a thorough compliance review during the field inspection.

At 11:35 a.m. we arrived back at Building 2750 to review and request documents. At 12:00 p.m. I provided an out briefing on the observations I made and the process for finalizing my compliance report.

Documents Review

Hazardous Waste Manifests – The following observation applies to all of the Uniform Hazardous Waste Manifests provided to me for the July 28, 2015 inspection. I reviewed the manifests in accordance with WAC 173-303-180 and the 40 C.F.R. Part 262, Appendix – Uniform Hazardous Waste Manifest and Instructions, incorporated by reference.

I observed Item 5 of the Uniform Hazardous Waste Manifest provides two spaces to fill in, which are labeled “Generator’s Name and Mailing Address” and “Generator’s Site Address (if different than mailing address).” I observed the spaces labeled “Generator’s Name and Mailing Address,” had the following address.

US DOE in care of Washington River Protection Solutions, PO Box 850, Richland WA, 99354

I observed the spaces labeled “Generator’s Site Address (if different than mailing address),” had the following address.

US DOE in care of Washington River Protection Solution, PO Box 850, Richland, WA, 99354

The manifest tracking numbers I reviewed are as follows.

- 006356282JJK
- 006356290JJK
- 006356292JJK
- 006356291JJK
- 006356285JJK
- SWITS #: TF1804

Land Disposal Restrictions (LDR) Notification and Certification Form – I reviewed the LDR notification and certification forms associated with the manifests listed above. There appeared to be no discrepancy with the LDR notification and certification forms.

Mixed Waste Container Photos – I emailed the following request for documents and information in the *Inspection Document Information Request Form*, which was sent to USDOE and WRPS personnel on July 29, 2015.

Photographs of all dangerous waste containers and labels in Single Shell Tank Farms A and AX/AZ as of the time of the inspection. Photos should be taken as soon as possible (within the next day or two) to avoid different waste being introduced and older waste moving out of the 90 day areas.

I received the following photos from USDOE and WRPS on August 11, 2015.



Photo 10 Title: ITEM 2 ECY Insp Doc Req 15.545 Drum Photo-1 AX Farm 07.28.15

Photo 11 Title: ITEM 2 ECY Insp Doc Req 15.545 Drum Photo-2 AX Farm 07.28.15

I observed three container identification numbers in Photo 10 and 11, which are 0090017, 0091536, and 0091521. According to the *Tank Farm Waste Containers In The Field* inventory list, the 241-A Tank Farm had no dangerous waste or mixed waste containers. I observed in the inventory 241-AX Tank Farm had 25 containers reserved for accumulating mixed waste, of which 9 containers had accumulation start dates. I did not receive photographs of the following containers, which were identified in the Tank Farm Container Inventory.

- CIN: 0090024
- CIN: 0089990
- CIN: 0090122
- CIN: 0091532
- CIN: 0091543
- CIN: 0089604
- CIN: TFP-15-103-20

Whether the containers were staged within the 90-Day Area for the 241-AX/AZ Tank Farms is not clear. I observed the containers listed above stated the “90” for location detail, which could indicate the containers would be located within the 90-Day Area for the 241-AX/AZ Tank Farms.

Note: In a later request for information the use of “90” for location details on the Tank Farm Container Inventory does not indicate the container is located within the established 90-Day Area. This information is documented later in the compliance report.

Weekly Inspection Logs – I reviewed the weekly inspection logs titled *Active Container Inspection Sheet* for May, 2015 and June, 2015. I observed no weekly inspection logs were completed for 241-T, 241-TY, and 241-TX for May, 2015 and June, 2015. During the field inspection, I observed the 90-Day Area appeared to be combined for 241-B, 241-BX, and 241-BY. I also observed the 90-Day Areas appeared to be combined for 241-S, 241-SX, and 241-SY. I observed that some of the inspection logs

included the printed name. Below are my observations of the inspection logs that did not include the printed name and were missing the time of the inspection. I observed the 241-C (May 19th to May 27th), 241-SY (May 18th to May 26th), 241-AX (May 4th to May 14th), 241-AX (May 20th to May 28th), 241-AX (June 2nd to June 11th) frequency of inspections were greater than at least weekly (every 7 days).

Tank Farm	Date	Observations	Handwritten Signature
241-A	5-5-15	I observed the first and middle initial and printed last name. Appears to be an erroneous inspection time.	Yes
	5-13-15	I observed the first and middle initial and printed last name.	
	5-20-15	I observed the first initial and printed last name.	
	5-27-15	I observed the first initial and printed last name.	
	6-2-15	I observed the first and middle initial and printed last name.	
	6-10-15	I observed an erroneous Accumulation Start Date notation.	
	6-16-15	I observed the first initial and printed last name.	
241-AX	5-4-15	I observed the first and middle initial and printed last name.	Yes
	5-14-15	I observed the first and middle initial and printed last name.	
	5-20-15	I observed the first initial and printed last name.	
	5-28-15	I observed the first initial and printed last name.	
	6-2-15	I observed the first and middle initial and printed last name. I observed no time on two out of seven pages	
	6-11-15	I observed an erroneous Accumulation Start Date notation again (See 6-10-15).	
	6-17-15	I observed the first initial and printed last name.	
6-29-15	I observed the first and middle initial and printed last name.		
241-BX	5-5-15	I observed the first and middle initial and printed last name.	Yes
	5-11-15	I observed the first initial and printed last name.	
	5-26-15	I observed the first initial and printed last name.	
	6-1-15	I observed the first and middle initial and printed last name.	
	6-15-15	I observed the first initial and printed last name.	
	6-29-15	I observed the first and middle initial and printed last name.	
241-C	5-5-15	I observed the first and middle initial and printed last name.	Yes
	5-12-15	I observed the first initial and printed last name.	
	5-27-15	I observed the first initial and printed last name.	
	6-2-15	I observed the first and middle initial and printed last name.	
	6-16-15	I observed the first initial and printed last name.	
	6-30-15	I observed the first and middle initial and printed last name.	
241-SY	5-4-15	I observed the first and middle initial and printed last name.	Yes
	5-11-15	I observed the first initial and printed last name.	
	5-26-15	I observed the first initial and printed last name.	
	6-1-15	I observed the first and middle initial and printed last name.	
	6-15-15	I observed the first initial and printed last name.	
241-U	6-1-15	I observed the first and middle initial and printed last name.	Yes
	6-15-15	I observed the first initial and printed last name.	

Onsite Waste Tracking Form – During the July 28, 2015, field inspection, Mr. Swenson stated that MW would be transferred from the 90-Day Areas located at specific tank farms to the 616 building 90 Day Areas. When I asked how the waste transfers were tracked, Mr. Swenson said containers of MW are transferred to the 616 building 90-Day Area with generator request and certification documents, a container inventory, and “Blue Cards” (Radiological Documentation). I also observed an *Onsite Waste Tracking Form* is generated along with the *Land Disposal Restrictions (LDR) Notification and Certification Form*. The *Onsite Waste Tracking Form* provides the container number, the point of origin tank farm, the transporters information, and information regarding the waste. There appears to be no information on the form for where the waste is going onsite. The *LDR Notification and Certification*

Form, which is attached to each *Onsite Waste Tracking Form* appears to be the same *LDR Notification and Certification Form* that is attached to the manifests tracking the waste's shipment to an offsite Treatment, Storage, and Disposal Facility.

Tank Farm Container Request Form and Generator Certification – I observed the *Tank Farm Container Request Form* consisted of *Waste Container Operations Attachment 1 – Packaging Instructions* and *Attachment 2 – Container Tracking Record*. I observed that these documents provided information regarding the delivery of the container needed and information for the pick-up of the container when it is full or when the project generating the waste has ended. Along with the request form and its attachments, the *Generator Radiation Survey* and *Tank Farm Waste Inventory Sheet* was attached. The *Generator Certification* provides information regarding the contents of each container that the generator is aware of. The certification also provides the location of the container and appears to document where the container is going, under the section *WRPS Waste Management Services Use Only*. On the *Generator Certification* for the container, PIN BOP-14-286-14, I observed the onsite destination appears to be "616 Building MW Pad."

On November 30, 2015, I sent Mr. Crawford another request for information and clarification. Below are the questions I asked, requested documentation, and the answers I received on December 17, 2015.

1. Is the Less Than 90 Day Accumulation Area for 241-A Tank Farm merged with the 241-A Y Tank Farm?

Answer: No. Waste from A/ AX/ AY/ AZ could all be at any of the 90 day accumulation areas based on space and other storage criteria (Spacing, compatibility, etc.)

2. If the "Location Detail" column states "90" on the Tank Farm Waste Containers in the Field inventory sheet does that indicate the container will be located within the designated 90 Day Accumulation Area?

Answer: No. The reference to "90" indicates the waste when it is generated is regulated and on a 90 day clock as opposed to "LLW" which indicates the waste is low level only.

3. Is the requester of a container responsible for the access to a container and dangerous waste/mixed waste added to the container?

Answer: Yes

4. Does the 616 building personnel always request assistance for inspecting containers within the fence line?

Answer: No, Assistance is requested when the container is located in a high contamination area, other hazard area such a vapor control zone.

5. What are the instructions or criteria provided to personnel for inspecting containers within Tank Farm's fence line?

Answer: 616 personnel communicate the checklist criteria to a qualified worker who has access to the container and receives status from the qualified worker.

6. How are less than 90 day accumulation areas defined or identified within the fence line?

Answer: The area inside the fence is considered an accumulation area and containers are considered in process until the related work is complete or the container is full. The waste containers are located next to the area within the farm where the work is being performed. When the container has completed accumulation it is moved to the consolidation area for pick up by 616.

7. Please provide the document TFC-ESHQ-ENV_FS-C-01 for reporting spill or releases.

Answer: To be answered by Environmental

8. How many shipments of Mixed Waste/Dangerous Waste were sent to ERDF from Single Shell Tank Farm Generating Activities in 2014 and 2015?

Answer: Since 2015 is not over we assume your request is for the fiscal year.

- Fiscal Year 2014: 13 Shipments
- Fiscal Year 2015: 19 Shipments

9. What types of Mixed Waste are sent to ERDF (Provide Container Identification Numbers)?

Answer: The type of MW sent to ERDF are debris and soil. PIN numbers listed below

10. What document(s) allow disposal of Mixed Waste to be disposed of at ERDF?

Answer: USEPA "Amended Record of Decision Summary and Responsiveness Summary"

11. What are the criteria for disposing of Mixed Waste at ERDF?

Answer: The acceptance criteria for ERDF is documented in; WCH-191, "Environmental Restoration Disposal Facility Waste Acceptance Criteria" and supplements.

12. How many times has solidification been performed on waste containing free liquids (Refer to sections 5.7.8 and 5.8.12 per operating procedure TO-100-052) within the last two years?

Answer: Solidification of MW is not performed, absorbent is added to comply with DOT regulations and ERDF/Disposal facility waste acceptance criteria.

13. Provide treatment by generator logs for solidification if performed within the last two years.

Answer: Solidification has not been performed.

As part of my request for information and clarification, I received container identification numbers for MW shipped to ERDF in 2014 and 2015. I received and reviewed the PINs for the 32 shipments made to ERDF from the SST System 90 Day Areas in Federal Fiscal years 2014 and 2015.

Package Identification Number	Tank Farm	Date Shipped
TFP-13-291-07	241-C	2/24/2014
TFP-13-318-01	241-C	2/06/2014
TFP-13-323-07	241-C	3/11/2014
TFP-14-056-03	241-C	4/22/2014
TFP-14-056-04	241-C	4/22/2014
TFP-14-027-03	241-C	5/08/2014
TFP-14-118-02	241-C	8/19/2014
TFP-14-248-08	241-C	10/02/2014
TFP-14-224-01	241-C	10/02/2014
TFP-14-241-07	241-C	11/20/2014
TFP-14-274-06	241-C	10/30/2014
TFP-14-274-05	241-C	10/30/2014
TFP-14-092-11	241-C	11/18/2014
TFP-14-307-02	241-C	1/22/2015
TFP-14-307-03	241-C	1/22/2015

TFP-14-295-05	241-C	12/29/2014
TFP-15-056-01	241-C	3/11/2015
TFP-15-056-02	241-C	3/11/2015
0089896	241-AX	3/26/2015
TFP-15-064-02	241-C	4/01/2015
TFP-14-268-07	241-AX	6/29/2015
TFP-15-078-07	241-C	6/11/2015
TFP-14-268-09	241-AX	6/29/2015
TFP-14-329-03	241-C	7/22/2015
TFP-14-329-04	241-C	7/22/2015
TFP-15-141-02	241-C	7/29/2015
TFP-15-161-01	241-C	8/25/2015
TFP-14-329-02	241-C	7/22/2015
TFP-14-303-03	241-C	8/27/2015
0091363	241-C	8/14/2015
0092110	241-AX	10/13/2015
WSO-15-265-12	241-SX	12/09/2015

USDOE and WRPS have made 32 shipments to Environmental Restoration Disposal Facility (ERDF) for fiscal year 2014 and 2015. WAC 173-303-200(1)(a) states “All such waste is shipped off-site to a designated facility or placed in an on-site facility which is permitted by the department under WAC 173-303-800 through 173-303-845 or recycled or treated on-site in ninety days or less.” ERDF is not permitted as a dangerous waste management unit by Ecology, under WAC 173-303-800 through 173-303-845. ERDF is authorized to operate through a *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) Record of Decision (ROD)* issued by the EPA. The ROD has been amended, which expanded the waste accepted by ERDF. The *Environmental Restoration Disposal Facility Waste Acceptance Criteria, Revision 4, WCH-191* states the following.

Dangerous/Hazardous/Toxic or Mixed Waste. *Waste that is determined to be dangerous/hazardous/toxic shall be further evaluated to determine if the waste is prohibited and/or if the waste satisfies applicable treatment standards. Land disposal restriction (LDR) status of the waste shall be determined for dangerous/hazardous or mixed waste based on the 40 Code of Federal Regulations (CFR) 268, "Land Disposal Restrictions," Subpart D and Washington Administrative Code (WAC) 173-303-140, "Dangerous Waste Regulations," requirements. This determination may be satisfied by reference to existing waste characterization data through waste analysis or by citation of pertinent LDR waivers or variances, as approved by the EPA or Ecology.*

The Dangerous Waste Regulations WAC 173-303-200(1)(f) states “The generator complies with all applicable requirements under 40 C.F.R. Part 268.”

Compliance Problems

The Dangerous Waste inspection on July 28, 2015, found the following compliance problems.

Each problem is covered in three parts:

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

The problems listed below must be corrected to comply with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Complete the required actions listed below and respond to Ecology at the following address within 60 days of receipt of this compliance report. Include required documentation, and make any other comments explaining the actions taken on a separate piece of paper.

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

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

**If you have any questions about information in this Compliance Report, please call:
Edward Holbrook at (509) 372-7909**

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

- 1) WAC 173-303-180(1) Form and contents of dangerous waste manifests. 40 C.F.R. Part 262 Appendix - Uniform Hazardous Waste Manifest and Instructions (EPA Forms 8700-22 and 8700-22A and Their Instructions) is incorporated by reference. The manifest must be EPA Form 8700-22 and, if necessary, EPA Form 8700-22A. The manifest must be prepared in accordance with the instructions for these forms, as described in the uniform manifest Appendix of 40 C.F.R. Part 262.

APPENDIX TO PART 262—UNIFORM HAZARDOUS WASTE MANIFEST AND INSTRUCTIONS (EPA FORMS 8700-22 AND 8700-22A AND THEIR INSTRUCTIONS)

Item 5. Generator's Mailing Address, Phone Number and Site Address

Enter the name of the generator, the mailing address to which the completed manifest signed by the designated facility should be mailed, and the generator's telephone number. Note, the telephone number (including area code) should be the normal business number for the generator, or the number where the generator or his authorized agent may be reached to provide instructions in the event the designated and/or alternate (if any) facility rejects some

or all of the shipment. Also enter the physical site address from which the shipment originates only if this address is different than the mailing address.

Observation: Hazardous Waste Manifests – The following observation applies to all of the Uniform Hazardous Waste Manifests provided to me for the July 28, 2015 inspection.

I observed Item 5 provides two spaces to fill in, which are labeled “Generator’s Name and Mailing Address” and “Generator’s Site Address (if different than mailing address).” I observed the spaces labeled “Generator’s Name and Mailing Address,” had the following address.

US DOE in care of Washington River Protection Solutions, PO Box 850, Richland WA, 99354

I observed the spaces labeled “Generator’s Site Address (if different than mailing address),” had the following mailing address and did not include the physical site address from which the shipment originated.

US DOE in care of Washington River Protection Solution, PO Box 850, Richland, WA, 99354

Action Required: USDOE and WRPS must immediately prepare uniform hazardous waste manifests in accordance with the instructions for these forms, as described in the uniform manifest Appendix of 40 C.F.R. Part 262. USDOE and WRPS must accurately document the physical site address from which the shipment originates.

2) WAC 173-303-630(6) Inspections. At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, deterioration, or other factors. The owner or operator must keep an inspection log 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 and the date and nature of any repairs or remedial actions taken. The log must be kept at the facility for at least five years from the date of inspection

Observation: Below are my observations of the inspection logs that did not have the printed name or were missing the time of the inspection. I observed the 241-C (May 19th to May 27th), 241-SY (May 18th to May 26th), 241-AX (May 4th to May 14th), 241-AX (May 20th to May 28th), 241-AX (June 2nd to June 11th) frequency of inspections were greater than at least weekly (every 7 days).

Tank Farm	Date	Observations	Signature
241-A	5-5-15	I observed the first and middle initial and printed last name. Appears to be an erroneous inspection time.	Yes
	5-13-15	I observed the first and middle initial and printed last name.	
	5-20-15	I observed the first initial and printed last name.	
	5-27-15	I observed the first initial and printed last name.	
	6-2-15	I observed the first and middle initial and printed last name.	
	6-10-15	I observed the erroneous Accumulation Start Date notation.	
	6-16-15	I observed the first initial and printed last name.	
241-AX	5-4-15	I observed the first and middle initial and printed last name.	Yes
	5-14-15	I observed the first and middle initial and printed last name.	
	5-20-15	I observed the first initial and printed last name.	
	5-28-15	I observed the first initial and printed last name.	
	6-2-15	I observed the first and middle initial and printed last name.	
		I observed no time on two out of seven pages	
	6-11-15	I observed the Accumulation Start Date notation again (See 6-10-15).	
6-17-15	I observed the first initial and printed last name.		

	6-29-15	I observed the first and middle initial and printed last name.	
241-BX	5-5-15	I observed the first and middle initial and printed last name.	Yes
	5-11-15	I observed the first initial and printed last name.	
	5-26-15	I observed the first initial and printed last name.	
	6-1-15	I observed the first and middle initial and printed last name.	
	6-15-15	I observed the first initial and printed last name.	
	6-29-15	I observed the first and middle initial and printed last name.	
241-C	5-5-15	I observed the first and middle initial and printed last name.	Yes
	5-12-15	I observed the first initial and printed last name.	
	5-27-15	I observed the first initial and printed last name.	
	6-2-15	I observed the first and middle initial and printed last name.	
	6-16-15	I observed the first initial and printed last name.	
	6-30-15	I observed the first and middle initial and printed last name.	
241-SY	5-4-15	I observed the first and middle initial and printed last name.	Yes
	5-11-15	I observed the first initial and printed last name.	
	5-26-15	I observed the first initial and printed last name.	
	6-1-15	I observed the first and middle initial and printed last name.	
	6-15-15	I observed the first initial and printed last name.	
241-U	6-1-15	I observed the first and middle initial and printed last name.	Yes
	6-15-15	I observed the first initial and printed last name.	

Action Required: Immediately upon receipt of this inspection report, USDOE and WRPS must include all of the requirements of WAC 173-303-630(6) on the generator inspection logs and conduct container inspections at least weekly (every seven days). Within 60 days USDOE and WRPS must submit to Ecology two weeks of completed inspection sheets for two SST System 90-Day Areas showing that all of the requirements of WAC 173-303-630(6) have been met.

Concerns

1. The use of 90-Day Areas in the SST System is unclear, making it difficult to determine compliance with generator requirements. There appears to be no required location inside or outside the fence line where containers are required to be staged and accumulated. I did observe areas designated as “90-Day Accumulation Areas” with no or some of the DW or MW containers within the designated areas, while other DW and MW containers observed on the inventories were staged outside of these designated areas. This distinction is also vague when it comes to establishing 90-Day Areas for generating activities at DWMUs in the SST System and DST System. Finally, the use of established waste accumulation areas inside and outside the fence line as well as the entire boundary of any given Single Shell Tank Farm as a 90-Day Accumulation Area rather than establishing what appears to be (and more appropriate) satellite accumulation areas, has made it difficult to complete a thorough compliance review during the field inspection.

Container movement or placement is governed not only by Dangerous Waste regulations but also by radiological surveys which would place containers in Contamination Areas (CA), Radiological Buffer Areas (RBAs), and Radiologic Materials Area (RMAs) or other restrictions. If containers are to remain within the fence line and not within defined SAAs or 90 Day Areas they need to be established as an SAA or 90 Day Area and identify the area as such. Not only do they need to be established and identified in the field, but they also need to be identified to Ecology as required by Permit Condition II.I.1.a.

2. I emailed the following request for documents and information in the *Inspection Document Information Request Form*, which was sent to USDOE and WRPS personnel on July 29, 2015.

Photographs of all dangerous waste containers and labels in Single Shell Tank Farms A and AX/AZ as of the time of the inspection. Photos should be taken as soon as possible (within the next day or two) to avoid different waste being introduced and older waste moving out of the 90 day areas.

I only observed three containers in Photo 10 and 11. I observed the inventory 241-AX Tank Farm listed 25 containers reserved for accumulating mixed waste, of which 9 containers had accumulation start dates. I did not receive photographs of the 9 containers observed on the Tank Farm Container Inventory. For future generator inspections with restricted access, accommodations need to be made during the day of the inspection for photographs to be taken inside of tank farms. Ecology typically provides very little advance notice of generator inspections, so a system needs to be developed for when inspectors are conducting inspections, photographs can be taken of containers, labels, signs, etc. the day of the inspection.

3. The *Building Emergency Plan for Tank Farms, RPP-27869* specifically describes the 90-Day Areas at the “616 Facility.” The building emergency plan lists the “90-day hazardous waste and mixed waste accumulation area” as a location in which the plan is used for. The building emergency plan does not specifically describe the twelve 90-Day Areas located at the SST System Tank Farms.
4. USDOE and WRPS have made 32 shipments to the Environmental Restoration Disposal Facility (ERDF) for fiscal years 2014 and 2015. According to WAC 173-303-200(1)(a) “*All such waste is shipped off-site to a designated facility or placed in an on-site facility which is permitted by the department under WAC 173-303-800 through 173-303-845 or recycled or treated on-site in ninety days or less.*”

ERDF is not permitted by Ecology under WAC 173-303-800 through 173-303-845. ERDF is authorized to operate through a *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA) Record of Decision (ROD) issued by the EPA. The ROD has been amended, which expanded the waste accepted by ERDF. The *Environmental Restoration Disposal Facility Waste Acceptance Criteria, Revision 4, WCH-191* states the following.

Dangerous/Hazardous/Toxic or Mixed Waste. Waste that is determined to be dangerous/hazardous/toxic shall be further evaluated to determine if the waste is prohibited and/or if the waste satisfies applicable treatment standards. Land disposal restriction (LDR) status of the waste shall be determined for dangerous/hazardous or mixed waste based on the 40 Code of Federal Regulations (CFR) 268, "Land Disposal Restrictions," Subpart D and Washington Administrative Code (WAC) 173-303-140, "Dangerous Waste Regulations," requirements. This determination may be satisfied by reference to existing waste characterization data through waste analysis or by citation of pertinent LDR waivers or variances, as approved by the EPA or Ecology.

The Dangerous Waste Regulations WAC 173-303-200(1)(f) states "The generator complies with all applicable requirements under 40 C.F.R. Part 268."

There appears to be requirements both under CERCLA and Dangerous Waste Regulations, which are applied to waste transfers between a Hanford Site DW generator and ERDF. It also appears that land disposal restriction requirements have been incorporated both into ERDF acceptance criteria and generator requirements. The process and requirements applied to ensure that transfers are in compliance with both CERCLA and Dangerous Waste Regulations requirements are not clear and should be reviewed on a case by case basis in future inspections. Case by case reviews should include a review of waste transfer documentation, LDR treatments conducted, and LDR certifications.

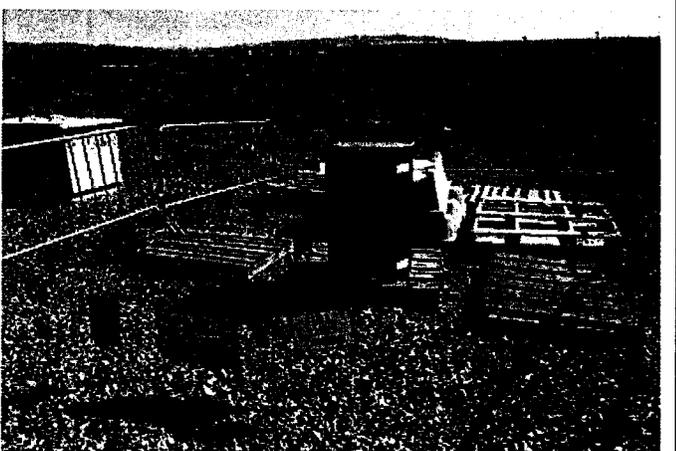
The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, sex, marital status, disabled veteran's status, Vietnam Era veteran's status or sexual orientation. If you have special accommodation needs or require this document in alternative format, please contact Edward Holbrook at (509) 372-7909 (Voice) or use the Washington State Relay operator by dialing either 711 or 1-800-833-6388 (TTY).

Single Shell Tank Farm Generator Inspection (WA7890008967)

Inspection Date: July 28, 2015

Photographer: Edward Holbrook

Witness: Jared Mathey

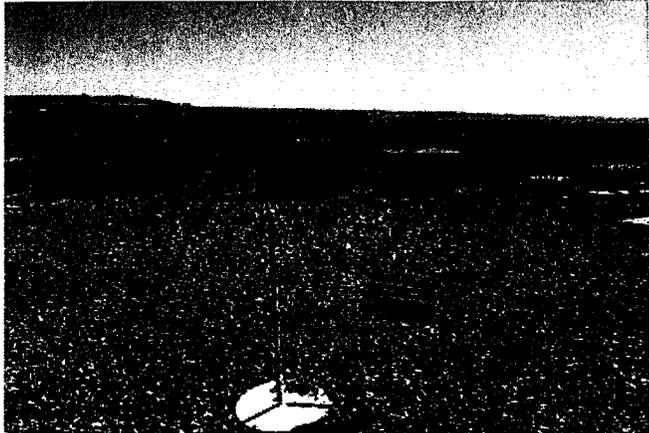
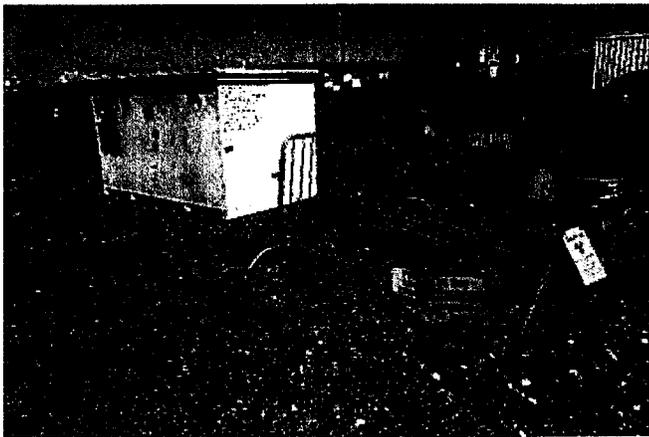
No.	Location	Activity Description or Comment	Photo
1.	Single Shell Tank Farm – West side of A Farm	9:21 a.m. 90 Day Accumulation Area within the tank farm's fence line. Three (3) containers can be observed from the fence line.	
2.	Single Shell Tank Farm – Between AX/AZ Farm	9:40 a.m. 90 Day Accumulation Area within the tank farm's fence line. Approximately Seventeen (17) containers can be observed from the fence line.	
3.	Single Shell Tank Farm – East side of C Farm	9:50 a.m. 90 Day Accumulation Area outside the tank farm's fence line. One (1) Low Level Waste container and no dangerous waste or mixed waste containers present.	

Single Shell Tank Farm Generator Inspection (WA7890008967)

Inspection Date: July 28, 2015

Photographer: Edward Holbrook

Witness: Jared Mathey

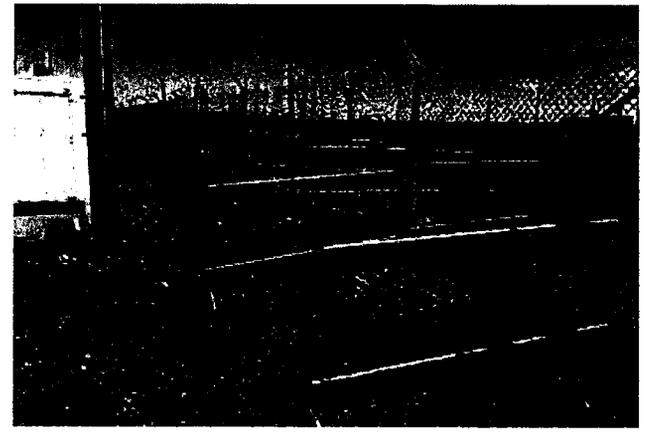
No.	Location	Activity Description or Comment	Photo
4.	Single Shell Tank Farm – East side of C Farm	9:55 a.m. 90 Day Accumulation Area outside the tank farm's fence line. Two (2) Low Level Radioactive Waste containers and no dangerous waste or mixed waste containers present.	
5.	Single Shell Tank Farm – East side of BX Farm	10:08 a.m. 90 Day Accumulation Area outside the tank farm's fence line. Two (2) Low Level Radioactive Waste containers and one mixed waste container present. ID: BOP-14-286-14 / 0089805 Hazardous Waste Acc. Start Date: 6/17/15 Major Risk: Toxic	
6.	Single Shell Tank Farm – East side of B Farm	10:08 a.m. 90 Day Accumulation Area outside the tank farm's fence line. Two (2) Low Level Radioactive Waste containers and one mixed waste container present.	

Single Shell Tank Farm Generator Inspection (WA7890008967)

Inspection Date: July 28, 2015

Photographer: Edward Holbrook

Witness: Jared Mathey

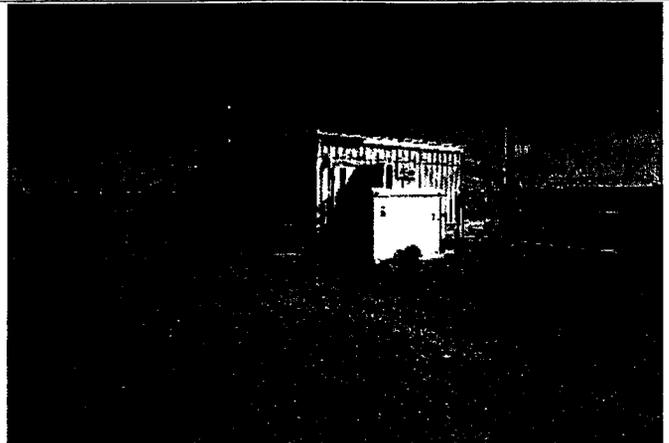
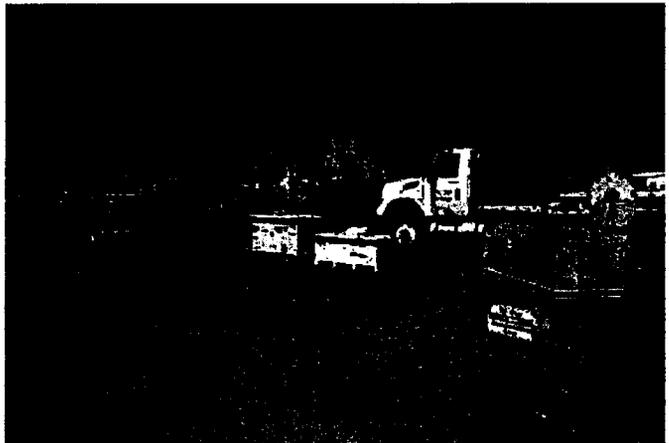
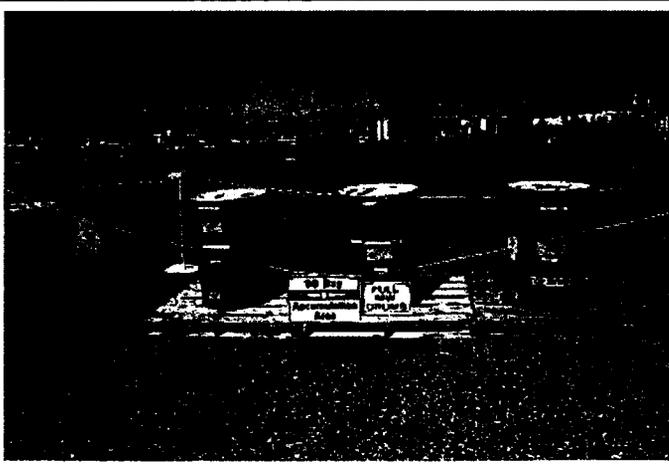
No.	Location	Activity Description or Comment	Photo
7.	Single Shell Tank Farm – North side of T Farm	10:28 a.m. 90 Day Accumulation Area within the tank farm's fence line. No containers are present.	
8.	Single Shell Tank Farm – West side of TX Farm	10:36 a.m. 90 Day Accumulation Area within the tank farm's fence line. No containers are present.	
9.	Single Shell Tank Farm – West side of U Farm	10:46 a.m. 90 Day Accumulation Area outside the tank farm's fence line. Approximately Eight (8) Low Level Radioactive Waste containers and no dangerous waste or mixed waste containers present.	

Single Shell Tank Farm Generator Inspection (WA7890008967)

Inspection Date: July 28, 2015

Photographer: Edward Holbrook

Witness: Jared Mathey

No.	Location	Activity Description or Comment	Photo
10.	Single Shell Tank Farm – West side of U Farm	10:47 a.m. U Farms change room for entrance and exit to the U Farm. Emergency and spill equipment are located within the locked building, MO-297.	
11.	Double Shell Tank Farm – East side of SY Farm	10:54 a.m. 90 Day Accumulation Area outside the tank farm's fence line. Approximately Four (4) Low Level Radioactive Waste containers and no dangerous waste or mixed waste containers present.	
12.	Single Shell Tank Farm – East side of S/SY Farm	10:56 a.m. 90 Day Accumulation Area outside the tank farm's fence line. Three (3) mixed waste containers present.	

Single Shell Tank Farm Generator Inspection (WA7890008967)

Inspection Date: July 28, 2015

Photographer: Edward Holbrook

Witness: Jared Mathey

No.	Location	Activity Description or Comment	Photo
13.	Single Shell Tank Farm – East side of S/SY Farm	<p>10:57 a.m.</p> <p>90 Day Accumulation Area outside the tank farm's fence line. Three (3) mixed waste containers present.</p> <p>ID: WTS-15-099-01 / 0089668 Hazardous Waste Acc. Start Date: 7/21/15 Major Risk: Toxic</p>	
14.	Single Shell Tank Farm – East side of S/SY Farm	<p>10:57 a.m.</p> <p>90 Day Accumulation Area outside the tank farm's fence line. Three (3) mixed waste containers present.</p> <p>ID: WTS-15-104-05 / 0089649 Hazardous Waste Acc. Start Date: 7/8/15 Major Risk: Toxic</p>	
15.	Single Shell Tank Farm – East side of S/SY Farm	<p>10:57 a.m.</p> <p>90 Day Accumulation Area outside the tank farm's fence line. Three (3) mixed waste containers present.</p> <p>ID: WTS-15-104-06 / 0089565 Hazardous Waste Acc. Start Date: 7/14/15 Major Risk: Toxic</p>	

Single Shell Tank Farm Generator Inspection (WA7890008967)

Inspection Date: July 28, 2015

Photographer: Edward Holbrook

Witness: Jared Mathey

No.	Location	Activity Description or Comment	Photo
16.	Single Shell Tank Farm – East side of S/SY Farm	11:01 a.m. 90 Day Accumulation Area outside the tank farm's fence line. One (1) mixed waste container within the Tank Farm's fence line. ID: WTS-15-104-04 / 0089653 Hazardous Waste Acc. Start Date: 7/28/15 Major Risk: Toxic	
17.	Single Shell Tank Farm – West side of SX Farm	11:12 a.m. 90 Day Accumulation Area outside the tank farm's fence line. One (1) Low Level Radioactive Waste Container and one (1) mixed waste container present. ID: TFP-14-227-10 / 0086574 Hazardous Waste Acc. Start Date: 7/13/15 Major Risk: Toxic	
18.	Single Shell Tank Farm – West side of SX Farm	11:12 a.m. 90 Day Accumulation Area outside the tank farm's fence line. One (1) Low Level Radioactive Waste Container and one (1) mixed waste container present.	