

# START

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## MEETING MINUTES

Subject: **ECOLOGY'S POST INSPECTION BRIEFING ON THE 219-S WASTE HANDLING FACILITY OVERFLOW**

TO: M. L. Bell T6-16  
 R. J. Bliss B3-04  
 S. L. Brey T6-12  
 J. D. Briggs T6-14  
 R. M. Carosino A4-52  
 R. P. Carter A5-21  
 B. G. Erlandson B2-19  
 G. J. Geier B2-19  
 L. D. Goodwin T6-12  
 M. J. Hall B2-19  
 R. G. Holt A5-15  
 R. N. Krekel A5-15  
 R. E. Lerch B2-35  
 P. J. Mackey B3-15  
 H. E. McGuire B3-63  
 S. A. Szendre B2-19  
 D. M. Wanek A5-21  
 AGM File/LB



FROM: **A. G. Miskho B2-19** CHAIRMAN: n/a

Dept-Operation-Component	Area	Shift	Meeting Date	Number Attending
Ecology	RCHC	Days	February 3, 1992	7

The Washington State Department of Ecology called a meeting on February 3, 1992 to discuss compliance issues associated with the 219-S Waste Handling Facility at the 222-S Laboratory. The meeting was a result of an incident in May 1991 during which 3,000 gallons of aqueous waste was overflowed into secondary containment.

**In attendance were:**

- B. G. Erlandson - WHC Facility Compliance
- A. G. Miskho - WHC Facility Compliance
- S. L. Brey - WHC 222-S Laboratory Engineering
- L. D. Goodwin - WHC 222-S Laboratory Engineering
- R. P. Carter - DOE Waste Management
- Casey Ruud - Ecology
- Tom Tebb - Ecology

Ecology started the meeting by presenting a list of compliance violations identified as a result of facility inspections, personnel interviews and documents reviewed. Ecology prepared a report which will not be transmitted to either DOE or WHC at this time. Ecology indicated that another form of notification (e.g., Notice of Non-compliance) will be forthcoming. Mr. Ruud stated that any future action taken by Ecology will be directed to the operator, WHC.

Ecology then addressed each concern and the reasoning for each compliance violation. Ecology is allowing WHC and DOE to prepare a written response to each of the compliance violations and submit them to Ecology by close of business February 17, 1992. These comments will be considered by Ecology prior to issuing formal notifications. At the

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conclusion of the meeting, Ecology expressed continued concern with the lack of an approved Inspection protocol. Ecology believes that the protocol should specify inspection close out procedures. The 219-S overflow incident is the first incident that Ecology has taken post inspection actions on to date.

A. G. Miskho took an action to prepare a response letter and to transmit the letter to DOE by close of business February 10, 1992. This will allow DOE one week for review and transmittal to Ecology. The response letter will address all of the potential compliance violations.

The following is a summary of the compliance issues identified by Ecology:

#### **WAC 173-303-390 - Facility Reporting**

1. Failure to prepare and submit a report for the 219-S spill per subsection (3).

Issue: Ecology believes that WHC and DOE should have submitted a 15 day report on implementation of their contingency plan. After the incident, WHC Regulatory Analysis, and Facility Compliance believed that the 222-S Facility did not implement the plan, however according to Mr. Ruud, Mr. Dave Briggs the 222-S Facility Manager, committed to provide this report before this determination was made.

#### **WAC 173-303-400 - Interim Status Facility Standards**

2. ~~Failure to provide adequate secondary containment per 40 CFR section 265.193(a), (b)(1), and (d)(2)(iv). [Note: Ecology intended to reference 265.193(e)(2)(iv), not (d)(2)(iv)]~~

Issue: Ecology contention is that WHC/DOE's tank integrity assessment report demonstrates that secondary containment is inadequate due to: 1) Failure to meet compliance dates, 2) Failure to protect the environment, and 3) Failure to line the vault with an impermeable coating.

3. Failure to provide adequate leak detection for secondary containment per section 40 CFR 265.193(b)(2).

Issue: The leak detection system for the 219-S sump is activated when greater than 50 gallons enters the sump. Release reporting requirements in WAC 173-303-145 require notifying Ecology when greater than 10 gallons is discharged into secondary containment. The status of WAC 173-303-145 is that it is in effect until Ecology proposes a new rule; final rules are expected by June 1992. These rules were in effect at the time of the spill.

4. Failure to shut down tank system unfit for use per 40 CFR sections 265.196(a)(2) and (e)(1). [Note: Ecology intended to reference 265.196(b)(2), not (a)(2)]

Issue: Due to the secondary containment system not complying with applicable standards, Ecology feels that the system is unfit for use. The Integrity assessment report for the 219-S Waste Handling Facility describes that the system was fit for continued use since the secondary containment was in a condition to prevent discharges of dangerous wastes to the environment.

5. Failure to stop spill per 40 CFR section 265.196(a) and WAC 173-303-145(3).

Issue: Facility personnel did not immediately cease flow to the secondary containment in response to the alarm.

6. Failure to provide adequate overflow prevention controls per 40 CFR section 265.194(b)(2).

Issue: With the high level alarm set at 97% of tank capacity, Ecology believes there is not sufficient time or space to prevent the tank from overflowing at this setting.

#### WAC 173-303-330 - Personnel Training

7. Failure to adequately train the emergency coordinator per subsection (1).

Issue: The acting shift supervisor which has Building Emergency Director responsibilities at the time of the incident was not properly trained to be in that position.

#### WAC 173-303 320 - General Inspection

8. Failure to perform daily inspection per subsection (2) and 40 CFR section 265.195(a)(3).

Issue: Daily operating inspections were not available for May 18, 25, 26, 27, and 29, 1991.

9. Failure to remedy problems revealed during inspections per subsection (3).

Issue: On May 28, 1991, records shows that the tank contents exceeded administrative limits of 3,600 gallons and no actions were recorded in log books.

#### WAC 173-303-145 - Spill Discharges

10. Failure to notify Ecology of a 3,000 gallon spill per subsection (2)(c)(ii).

Issue: According to Ecology, the agency was not notified within 2 hours which of the spill. Mr. Ruud stated that Ecology was notified 36 hours after the spill.

#### WAC 173-303-350 - Contingency Plan and Emergency Procedures

11. Failure to describe actions in the event of an emergency per subsection (3)(a).

Issue: The emergency/contingency plan failed to address the required responses for this emergency. The emergency plan in affect at the time of the emergency recommended pumping to the diversion box which was out of service. The plan also identified transference via tanker truck in addition to the diversion box. The current revision (December 11, 1991) of the 222-S Building Emergency Plan, Section 6.5.1, and Contingency Plan attachment B1, section 5.3.5 has removed wording regarding this diversion box.

12. Failure to maintain the contingency plan current per subsection (3)(d).

Issue: Information regarding the acting shift manager was not identified in Appendix A of the Emergency Plan.

13. Failure to amend the contingency plan per subsection (5)(c).

Issue: This citation regards updating the contingency plan when the facility changes (i.e., the inability to use the diversion box). The contingency plan contained wording relating to transfer of liquids via a diversion box which at the time, was not an option for the 222-S Laboratory. The 222-S Laboratory may be able to use the diversion box in the future once put back into service after repair of catch tank 304-A.

**WAC 173-303-320 - General Inspection**

14. Failure to adequately inspect to remedy unplanned discharges per subsection (2).

Issue: The building general inspections and alarm logs required to be kept by standard operating procedures were not maintained. Building checks may have identified the problem and prevented the overflow.