



U.S. Department of Energy
Office of River Protection

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

0064621

05-ED-033

APR 25 2005

Ms. Kathleen A. Conaway
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99352

RECEIVED
APR 26 2005

EDMC

Dear Ms. Conaway:

STATE WASTE DISCHARGE PERMIT UNDER ST 4511 THIRTY-DAY REPORT

Reference: Ecology letter from M. A. Wilson to K. A. Klein, RL, dated February 16, 2005.

The State of Washington State Waste Discharge Permit ST 4511 (enclosure to the Reference), effective February 16, 2005, requires in Condition G.11, "Noncompliance Notification," that a detailed written report be submitted to the State of Washington Department of Ecology (Ecology) within thirty days of discovery of a noncompliance. Due to two noncompliant discharges that occurred in March 2005, a thirty-day report is required. The incidents occurred on March 18, 2005, and March 22, 2005. During a telephone discussion of the requirement on March 28, 2005, Ecology and the U.S. Department of Energy, Office of River Protection staff agreed that the thirty-day report would be provided to Ecology by April 28, 2005, and that a single report would cover both noncompliances. The required thirty-day report is provided in Attachment 1. The River Protection Project/Ecology reporting checklist is provided in Attachment 2.

If you have any questions, please contact me, or your staff may contact Dennis W. Bowser, Environmental Division, (509) 373-2566.

Sincerely,

for Roy J. Schepens
Manager

ED:DWB

Attachments: (2)

cc: See page 2

Ms. Kathleen A. Conaway
05-ED-033

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cc w/attachs:

P. C. Miller, CH2M HILL

M. A. Wilson, Ecology (w/o attachs)

M. F. Jarvis, RL

Administrative Record

CH2M Correspondence Control

Attachment 1
05-ED-033

Report of State Waste Discharge Permit ST 4511 Noncompliance

REPORT OF STATE WASTE DISCHARGE PERMIT ST 4511 NONCOMPLIANCE

Noncompliance #1

Date of Discovery: March 18, 2005

Type of Incident: Noncompliance with ST 4511, Condition S.4.A.2, "No discharge shall be allowed within a 300 foot horizontal radius of a known active or inactive crib, ditch, or trench used for disposal of dangerous and/or radioactive contaminants."

Description of Incident: The portable safety shower, located inside a weather protection tent at the north fence-line of 241-SY Tank Farm, had been in standby mode since February 24, 2005. On March 18, 2005, wet soil was observed around the tent. When the safety shower was inspected, both 300-gallon supply tanks were discovered to be empty and the tank sample valve was found open. The last known sample activity occurred on March 10, 2005. Discussion with the sample crew indicated that the sample valve was closed on March 10, 2005. Although it cannot be confirmed, it is believed that the sample valve was inadvertently opened sometime between the conclusion of the sample activity on March 10, 2005, and the discovery of the wet soil on March 18, 2005. The noncompliance was reported to the State of Washington, Department of Ecology on March 18, 2005. The notification was documented on Attachment 1, CH2M-0500388, "River Protection Project/Washington State Department of Ecology Reporting Checklist." The discharged potable water was absorbed by the soil immediately under, and surrounding, the safety shower.

Corrective Actions Taken: Clam shell locking devices have been installed on safety shower sample valves to prevent inadvertent operation in the future.

Noncompliance #2

Date of Discovery: March 22, 2005

Type of Incident: Noncompliance with ST 4511, Condition S.4.A.1, "No discharge shall be allowed with a surface contamination area (areas with dangerous waste and/or radioactive contaminants)."

Description of Incident: While performing operations under operating procedure TO-320-030, "Startup/Shutdown of 241-C-200 Tanks WRS Support/Utility Systems," a discharge of approximately 304 gallons of raw water to the ground within 241-C Tank Farm occurred. The Low Pressure Water System had been removed from service, by opening the main power supply breaker, to allow the de-energization of the Heat Trace System. The Heat Trace System was secured to lower the supply water temperature to minimize fogging in Tank 241-C-203 during retrieval operations. When power was restored to the Low Water System, the pressure controller defaulted to a state that resulted in high pressure water being supplied to the tank farm when the supply pump was started. The high supply pressure caused the raw water pressure relief valve to lift, relieving the high pressure by discharging water to the 241-C Tank Farm soil. The operating

procedure did not contain a caution or a step to reset the pressure controller to manual prior to restoration of power. The discharged raw water was absorbed by the 241-C Tank Farm soils. The noncompliance was reported to the State of Washington, Department of Ecology on March 22, 2005. The notification was documented on Attachment 2, CH2M-0500389, "River Protection Project/Washington State Department of Ecology Reporting Checklist."

Corrective Actions Taken: Operating procedure TO-320-030, "Startup/Shutdown of 241-C-200 Tanks WRS Support/Utility Systems," has been revised to include instructions to reset the Low Pressure Water Supply System pressure controller to manual mode and 13 percent closed. The procedure revision was incorporated in the procedure on March 23, 2005.

Attachment 2
05-ED-033

CH2M-0500388/CH2M-0500389, "River Protection Project/State of
Washington Department of Ecology Reporting Checklist"

ESHQ	Document	TFC-ESHQ-ENV_FS-C-01, REV B-3
	Page	17 of 68
ENVIRONMENTAL NOTIFICATION	Effective Date	March 16, 2005

Figure 4. River Protection Project/Washington State Department of Ecology Reporting Checklist.

WA 7890008967 (Waste Generator Number) CNS: CH2M0500388

Section 1: Occurrence

- Material release Yes No Identity of released material: potable water
MSDS No.: n/a Quantity: 600 gal Regulated Yes No Reportable Quantity (RQ) Yes No Reason regulated 3
- Double-Shell Tank Leak Detection System Yes No
- Single-Shell Tank Leak Assessment Process Yes No
- 216 Permit Violation Yes No
- Location: outside North side of S1 Farm
- Date and Time of Discovery: 3-18-05 1300
- Description of Occurrence: during the past week approximately 600 gallons of potable water was discharge from a portable safety shower. Discharge occurred approx 80 meters from WIP # 200-W-54 and UPR-200-W-115. Water has evaporator or soaked into soil. No clean up required/possible.

Section 2: Agency Notification

Date: 3-18-05Time: 1403

- Washington State Department of Ecology (Alicia Hamar) 372-7904 (cell 430-5144); (fax 372-7971) 3-18-05 1403
- National Response Center (NRC) 1-800-424-8802 _____
- Occurrence Notification Center (RQ, RCRA Contingency Plan) 376-2900 _____
- Heart of America Lawsuit Notification (required only for tank system waste released to environment) _____
- 216 Permit Violation (Ecology, Kathy Conaway) 372-7890 _____

Figure 4. River Protection Project/Washington State Department of Ecology Reporting Checklist.
(cont.)

Section 3: ORP/TFC Notifications

- 1. CH2M HILL General Counsel: (FAX 372-1397) 3-18-03 1415
- 2. Office of River Protection: Environmental (FAX 376-3661) 3-18-03 1415
OSD (FAX 373-1313) 3-18-03 1415
- 3. CH2M HILL Point of Contact Toni L. Faust 509-94-373-6343
Name/Phone Number +46
3/16/05

ESHQ	Document	TFC-ESHQ-ENV_FS-C-01, REV B-3
	Page	17 of 68
ENVIRONMENTAL NOTIFICATION	Effective Date	March 16, 2005

Figure 4. River Protection Project/Washington State Department of Ecology Reporting Checklist.

WA 7890008967 (Waste Generator Number) CNS: CH2M0500389

Section 1: Occurrence

- Material release Yes No Identity of released material: RAW WATER
MSDS No.: N/A Quantity 300 Regulated Yes No Reportable Quantity (RQ)
Yes No Reason regulated 300 gal
- Double-Shell Tank Leak Detection System Yes No
- Single-Shell Tank Leak Assessment Process Yes No
- ST4511
216 Permit Violation Yes No
- Location: C-Farm
- Date and Time of Discovery: 3-22-05 10:00am
- Description of Occurrence: 300 gal raw water discharge to ground in C Farm when raw water system over pressurized causing the relief valve to lift during the power restoration after a power outage in the farm

Section 2: Agency Notification

Date: 3-22-05Time: 1221

- Washington State Department of Ecology (Alicia Hamar) 372-7904
(cell 430-5144); (fax 372-7971) 1225 3-22-05
- National Response Center (NRC) 1-800-424-8802 _____
- Occurrence Notification Center (RQ, RCRA Contingency Plan) 376-2900 _____
- Heart of America Lawsuit Notification (required only for tank system waste released to environment) _____
- 216 Permit Violation (Ecology, Kathy Conaway) 372-7890 1225 3-22-05
ST4511

Figure 4. River Protection Project/Washington State Department of Ecology Reporting Checklist.
(cont.)

Section 3: ORP/TFC Notifications

1. CH2M HILL General Counsel: (FAX 372-1397) 1225 3-22-05
2. Office of River Protection: Environmental (FAX 376-3661) 1225 3-22-05
OSD (FAX 373-1313) 1225 3-22-05
3. CH2M HILL Point of Contact Toni L. Faust 509 373-6343
Name/Phone Number