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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

FEB 28 1995

95-PCA-203

Mr. David Lundstrom
Section Manager
200 Area Section
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Mr. Joe J. Witczak, Manager
Nuclear Waste Program
Regulatory and Technical Support Unit
State of Washington
Department of Ecology
300 Desmond Drive
Lacey, Washington 98503

Dear Messrs. Lundstrom and Witczak:

1994 NONCOMPLIANCE REPORT FOR SUBMITTAL TO THE STATE OF WASHINGTON DEPARTMENT OF ECOLOGY (ECOLOGY) IN FULFILLMENT OF CONDITION I.E.19. OF THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT

Enclosed is the 1994 Noncompliance Report submitted in fulfillment of Condition I.E.19. of the Dangerous Waste Portion of the Hanford Facility RCRA Permit (Permit). This condition states that "The permittees shall report to the department all instances of noncompliance not otherwise required to be reported elsewhere in the Permit at the time the Annual Dangerous Waste Report is submitted." The due date for the Annual Dangerous Waste Report, being submitted under separate cover, is March 1, 1995.

The 1994 Noncompliance Report was prepared by a permittee team comprised of U.S. Department of Energy, Richland Operations Office (RL); Westinghouse Hanford Company (WHC); Bechtel Hanford, Inc. (BHI); and Pacific Northwest Laboratory (PNL) representatives. The report covers the period from September 28, 1994, through December 31, 1994. The 1995 Noncompliance Report will be submitted to cover the period from January 1, 1995, through December 31, 1995; each subsequent report will cover the calendar year. In accordance with a teleconference held with Mr. Joe Witczak of Ecology on February 21, 1995, a transmittal letter signed by the permittees is sufficient to authorize the submittal of the annual noncompliance report and to meet the intent of RCRA Permit Condition I.F.

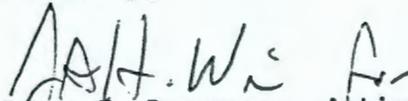


Messrs. Lundstrom and Witczak
95-PCA-203

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Should you have any questions regarding the contents of this letter or the enclosure, please contact Mr. C. E. Clark of RL on (509) 376-9333, Ms. S. M. Price of WHC on (509) 376-1653, Ms. L. A. Mihalik of BHI on (509) 375-9426, or Mr. H. T. Tilden II of PNL on (509) 376-0499.

Sincerely,

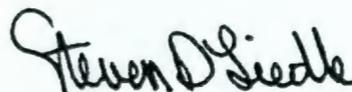


James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:CEC



William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company



Steven D. Liedle
Manager of Projects
Bechtel Hanford, Inc.



Kenneth C. Brog, Director
Environment, Safety, and Health
Pacific Northwest Laboratory

Enclosure:
1994 Noncompliance Report

cc w/encl:

EDMC, WHC

C. Clarke, EPA
D. Duncan, EPA
G. Emison, EPA
M. Gearheard, EPA
M. Jaraysi, Ecology
R. Jim, YIN
D. Powaukee, NPT
D. Sherwood, EPA
R. Smith, EPA
J. Wilkinson, CTUIR

cc w/o encl:

J. Badden, BHI
W. Dixon, WHC
L. Mihalik, BHI
S. Price, WHC
H. Tilden II, PNL

1994 Noncompliance Report

Reporting Period: September 28, 1994 through December 31, 1994

Item	Permittee	Category	Permit Condition	Description	Corrective Action	Status
1	BHI	General	DW Condition II.C.2.	Personnel training for newly hired personnel was not completed within six months for all individual:.	Internal memoranda or verbal communications are being distributed to alert individuals before the six month time frame in order to prevent future noncompliances.	Pending.
2	BHI	183-H	DW Condition II.A.2.	Section 7.4 of the HFCP states that emergency equipment is identified in the unit-specific contingency plans. However, this equipment is not identified in all plans, including 183-H, because it is not applicable to all TSD units.	Clarify language in the HFCP to indicate that emergency equipment is to be identified in the unit-specific contingency plans where such equipment could be needed.	The HFCP language will be changed in the next revision.
3	BHI	183-H	DW Condition II.A.4.	A unit-specific contingency plan for 183-H had not been written.	Develop 183-H contingency plan.	The contingency plan for this unit was written in January 1995. However, the names and home phone numbers of the emergency coordinators are still not on file with the Occurrence Notification Center. This action is currently being completed.
4	BHI	183-H	DW Condition II.C.3.	The training plan delineated in Part V is out of date.	A new training plan is scheduled to be completed by March 1995.	Pending.
5	BHI	183-H	DW Condition II.M.	Signs posted around 183-H were not legible from 25 feet as required by WAC 173-303-310.	Replace signs.	Signs were replaced in January 1995.
6	BHI	183-H	DW Condition V.1.A.	Groundwater monitoring, as described in the <i>183-H Solar Evaporation Basins Closure Plan/Postclosure Plan</i> , has not been complied with due to changes in the monitoring program. Changes constituted the dropping of some wells from the plan's specified program because they did not add significantly to a knowledge of the influence of 183-H on groundwater quality. Specifically one well, H4-12B, was supposed to be sampled quarterly according to the above plan. It has not been sampled for seven quarters. Three of these sampling events occurred after permit issuance.	This well, as well as eight other wells sampled annually (but which have not been due for sampling since permit issuance), will be added back into the monitoring program.	Pending.

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1994 Noncompliance Report

Reporting Period: September 28, 1994 through December 31, 1994

Item	Permittee	Category	Permit Condition	Description	Corrective Action	Status
7	PNL			Nothing to report.		
8	WHC	300 ASE		Nothing to report.		
9	WHC	2727-S		Nothing to report.		
10	WHC	616 NRDWSF	III.1.B.x.	The weekly inspection checklist was not transmitted to Ecology within 30 days (due date October 28, 1994).	Transmit weekly inspection checklist.	Completed 1/19/95.
11	WHC	616 NRDWSF	III.1.B.x.	<p>Discovery Date:</p> <p>10/14/94 - Drum number and Manifest number did not match.</p> <p>10/21/94 - Drums needed to be removed.</p> <p>10/28/94 - Drum has faded label.</p> <p>12/08/94 - Emergency light in combustible call not working.</p> <p>12/22/94 - Missing toxic label.</p> <p>12/22/94 - Front curb cracked.</p> <p>12/22/94 - Rock salt on bottom of drum.</p> <p>8-hour hazardous waste refresher lapsed for two 616 personnel.</p>	<p>Call to confirm correct number.</p> <p>Remove drums from 616.</p> <p>Replace label.</p> <p>Fix light.</p> <p>Replace label.</p> <p>Issued work package 12/22/94.</p> <p>Remove salt.</p> <p>Take refresher training.</p>	<p>Verifiable completion dates:</p> <p>10/14/94.</p> <p>11/12/94.</p> <p>11/08/94.</p> <p>12/21/94.</p> <p>12/22/94.</p> <p>Pending.</p> <p>12/22/94.</p> <p>Corrected within 30 days.</p>

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
W. T. Dixon, WHC (S. B. Clifford, WHC)	J. J. Witczak, Ecology D. Lundstrom, Ecology	Incoming 9501322 Xref 9550957D

Subject: 1994 NONCOMPLIANCE REPORT FOR SUBMITTAL TO THE STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY IN FULFILLMENT OF CONDITION I.E.19. OF THE
HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT

INTERNAL DISTRIBUTION

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		L. D. Arnold	B2-35	X
		R. C. Bowman	H6-24	
		R. C. Brunke	H6-23	X
		S. E. Campbell	T4-05	X
		D. J. Carrell	H6-22	X
		S. B. Clifford	H6-23	X
		W. T. Dixon, Assignee	H6-21	
		C. B. Hays	L4-97	X
		P. J. Mackey	B3-06	X
		I. L. Metcalf	L6-26	X
		R. D. Pierce	T3-04	X
		S. M. Price	H6-23	X
		J. A. Remaize	L6-26	X
		F. A. Ruck III	H6-23	X
		J. O. Skolrud	H6-20	X
		R. R. Thompsen	H6-32	X
		RCRA File/GHL	H6-23	X
		SBC File/LB	H6-23	

