

Department of Energy

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

April 28, 1989



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Ms. Christine Gregoire State of Washington Department of Ecology Mail Stop PV-11 Olympia, Washington 98504

Mr. Robie Russell U.S. Environmental Protection Agency Region 10 1200 Sixth Avenue Seattle, Washington 98101

Dear Ms. Gregoire and Mr. Russell:

HANFORD ENVIRONMENTAL SELF-ASSESSMENT REPORT

Enclosed is a Hanford self-assessment report of facility environmental status. Submittal of the report, in part, fulfills milestone M-21-00 of the proposed action plan for implementation of the Hanford Federal Facility Agreement and Consent Order. This report reflects the U.S. Department of Energy, Richland Operations Office (DOE-RL) and Westinghouse Hanford Company (WHC) self-initiated program to assess and comply with the letter and spirit of applicable environmental regulations at the Hanford Site.

This report presents the results of an internal and ongoing assessment of Hanford facility compliance with environmental regulations. In some areas, it calls out areas of potential deficiencies with regulations. Many of these areas are procedural and simply require a change in the manner of conducting operations to ensure compliance. Some areas represent potential changes that are more difficult to make and may require extensive planning, budgeting and operational changes. In all cases, DOE-RL and WHC are committed to implement the appropriate changes and conduct operations in compliance with all applicable environmental regulations.

Findings represent conditions and conclusions derived on the date of the self-assessment as indicated in each report. The WHC, with DOE-RL concurrence, has moved expeditiously to correct problems as they were identified during the assessment and will continue to do so in the future. The changing status of compliance activities is tracked by a computer commitment control system dedicated to this purpose.

This self-assessment is viewed by DOE-RL and WHC as healthy, productive, and supportive of DOE-RL and WHC commitment to environmental compliance. We believe that providing this assessment to you will strengthen our relationship and should be looked upon as a positive commitment from Hanford.

Sincerely,

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R. D. Izatt, Director Environmental Restoration Division Richland Operations Office

Q & Lerch

R. E. Lerch, Manager Environmental Division Westinghouse Hanford Company

Enclosure

ERD: ADK

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cc: R. E. Lerch, WHC

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Author

Addressee

Correspondence No.

8902083

B. G. Erlandson H4-50

Ms. Christine Gregoire (Ecology) Mr. Robie Russell (EPA)

Subject

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HANFORD ENVIRONMENTAL SELF-ASSESSMENT (616 ENVIRONMENTAL STATUS REVIEW)

		Internal Distribution		
Approval	Date	Name	Location	w/att
		Correspondence Control		
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		S. A. Wiegman	H4-50	
		EDMC	H4-51	
		Attachment is the same as Letter 8857255 previously issued. This letter transmits the 616 Environmental Status Review.		

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ACTION SCHEDULE REPORT LEGEND

SUA Identification: The stream, unit, or activity (SUA) identification.

Reg Citation:

The regulatory requirement applicable to a specific stream, unit, or activity.

Status:

The compliance status of a stream, unit, or activity with respect to a specific applicable regulation.

C: Complete: The task identified with a given report finding is complete.

AR: Action Required: An action is required to address a given report finding.

NR: Not Regulated: The SUA is currently not regulated under the associated applicable regulation.

Task Description:

A description of the task resulting from an assessment finding.

Scheduled Comp Date:

The date by which a given task is scheduled to be completed.

Actual Comp Date:

The date by which an action was performed.

ACTION SCHEDULE

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NOVEMBER 1988

SUA Identification	Reg Citation	Status	Task Description	Scheduled Comp Date	Actual Comp Date
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-300	AR	EVALUATE NEED TO DISTINGUISH FURTHER BETWEEN WASTE CHARACTERIZATION (FOR THE PURPOSE OF PROPER WASTE MANAGEMENT) AND WASTE DESIGNATION IN WASTE ANALYSIS PLAN.	10/31/89	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-300	AR	EVALUATE NEED FOR A PROGRAM TO VERIFY WASTE ANALYSIS INFORMATION AT OR PRIOR TO RECEIPT AT 616.	03/31/89	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-320	AR	TITLE ON FACILITY SURVEILLANCE DOCUMENTATION HAS BEEN CHANGED. NEED CONFIRMATION TO CLOSE.	12/31/88	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 171-303-320	С	ANNUAL FIRE INSPECTION AND ALARM/COMMUNICATIONS TESTING HAVE BEEN INCLUDED IN THE INSPECTION PLAN (BINDER).	12/31/88	11/17/88
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	С	NEW CONTINGENCY PLAN HAS BEEN PROVIDED TO FACILITY COMPLIANCE.	10/31/88	10/26/88
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	С	RESPONSES TO SPECIFIC EMERGENCIES HAVE BEEN INCORPORATED INTO THE CONTINGENCY PLAN.	12/31/88	11/17/88

ACTION SCHEDULE

NOVEMBER 1988

SUA Identification	Reg Citation	Status	Task Description	Scheduled Comp Date	Actual Comp Date
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	С	ARRANGEMENTS WITH HANFORD SITE RESPONDERS ARE IDENTIFIED IN THE 616 CONTINGENCY PLAN AND THE PLAN HAS BEEN PROVIDED TO RESPOSE ORGANIZATIONS.	12/31/88	11/17/88
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	С	A LIST OF EMERGENCY EQUIPMENT (QUANTITY/TYPE, LOCATION, CAPABILITY) HAS BEEN ADDED TO THE 616 CONTINGENCY PLAN.	10/31/88	11/17/88
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	С	A DETAILED EVACUATION PLAN HAS BEEN ADDED TO THE 616 CONTINGENCY PLAN.	10/31/88	11/17/88
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	AR	REVIEW REVISED CONTINGENCY PLAN.	02/28/89	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-350	AR	REVISE CONTINGENCY PLAN AS REQUIRED.	10/30/89	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-360	AR	ENSURE ASSIGNED EMERGENCY COORDINATORS ARE INTIMATELY FAMILIAR WITH 616 FACILITY.	12/31/88	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-380	AR	UPDATE FACILITY RECORDS TO SHOW PESTICIDE MIXING ROOM AS ACID CELL.	06/30/89	/ /

Page No. 11/28/88

ACTION SCHEDULE

NOVEMBER 1988

SUA Identification	Reg Citation	Status	Task Description	Scheduled Comp Date	Actual Comp Date
616 NON-RADIOACTIVE DANGEROUS	WAC 173-303-395	AR	EVALUATE NEED TO REMOVE WATER REACTIVE WASTE	12/31/88	
WASTE STORAGE			FROM AREA WITH FIRE SPRINKLER SYSTEM.	,	, ,
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	40 CFR 265 SUBPART G	AR	NEW CLOSURE PLAN AND PART B PERMIT TO BE DEVELOPED PURSUANT TO TRI-PARTY AGREEMENT.	09/30/89	/ /
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE	WAC 173-303-620	С	IMPACTS OF 173-303-620 (1)(C) HAVE BEEN ASSESSED.	11/30/88	10/27/88

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