



0047734

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

SEP 0 4 1997

97-EAP-656

Mr. Robert W. Wilson
Compliance Inspector
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336



Dear Mr. Wilson:

RESPONSE TO "NOTICE OF CORRECTION PER DANGEROUS WASTE COMPLIANCE INSPECTION OF THE 305-B STORAGE FACILITY CONDUCTED JULY 30, 1997"

Reference: Your ltr. to Roger Christensen, RL, and Kenneth Brog, PNNL, dated August 29, 1997, subject as above.

In response to the letter referenced from the State of Washington Department of Ecology (Ecology), the U.S. Department of Energy, Richland Operations Office (RL) and Pacific Northwest National Laboratory (PNNL) have performed several actions to address the violations and concerns noted in that letter. However, more time is needed to respond to the letter due to the need for RL and PNNL's management verification of satisfactory completion of those actions. We request that two more weeks be provided to complete the internal activities leading up to a formal response.

RL recently directed PNNL to review its waste and chemical management procedures for adequacy, and also to validate that PNNL's chemical management inventory and system are sufficient to safely handle and monitor waste and chemicals.

At the same time, RL and PNNL have commenced, and will complete by September 5, 1997, the following initial actions in response to the two violations. These actions are intended to address the safety concerns in the referenced letter.

VIOLATION #1 - Waste was stored in containers incompatible with the waste in violation of the State of Washington Administrative Code (WAC) Chapter 173-303-630, subsection (4).

RESPONSE - Staff are reverifying compliance with the facility permit by completing a compatibility review of waste and their containers. The Toxicology, Occupational Medicine, and Environmental Series (TOMES) data base from the Hanford Technical Library and the information provided on the Material Safety Data Sheet (MSDS) for each chemical is being used as a resource when necessary. For verification purposes a second staff member is looking at the compatibility information, comparing the chemical to the container, to ensure compliance with WAC Chapter 173-303-630, subsection (4).

Mr. Robert W. Wilson
97-EAP-656

-2-

SEP 04 1997

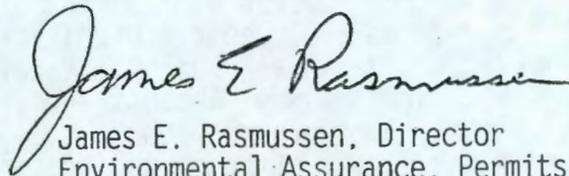
VIOLATION #2 - DOE and PNNL failed to ensure the provisions of 49 CFR, Subpart B, section 173.24(e)(1) and (2) were met.

RESPONSE - Facility staff are currently completing an inventory of each item and container for compatibility of materials. The TOMES data base from the Hanford Technical Library and the information provided on the MSDS for each chemical are being used as a resource when necessary to ensure compliance with the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

Ecology also presented two concerns in the August 29, 1997, letter, which RL and PNNL are planning to address in our formal response to follow.

Please notify us by phone as soon as possible concerning this extension request. If you have any questions or need further information concerning our request or responses, please contact Clifford Clark, RL, at 376-9333 or Harold Tilden, PNNL, at 376-0499.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

EAP:CEC

cc: M. L. Blazek, ODOE
R. Jim, YIN
D. Powaukee, NPT
W. K. Waller, PNNL
J. R. Wilkinson, CTUIR
Administrative Record: 305-B
Storage Facility (S-3-2)