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

JAN 19 1996

96-PCA-089

Mr. David L. Lundstrom
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue, MSIN B3-15
Kennewick, Washington 99336-6018

Dear Mr. Lundstrom:

DANGEROUS WASTE COMPLIANCE CHECKLIST FOR THE 222-S LABORATORY

In response to the subject checklist issued during the January 3, 1996, inspection of the 222-S Laboratory, this is to inform you of the completion of the two non-compliant conditions noted in the same checklist. Both the U.S. Department of Energy, Richland Operations Office facility representative and the Westinghouse Hanford Company facility representative have initialed the enclosed subject checklist.

Should you have any questions or require additional information, please contact Mr. Alex E. Teimouri on 376-6222.

Sincerely,

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

EAP:AET

Enclosure:
Dangerous Waste Compliance
Check List

cc w/encl:
W. T. Dixon, WHC



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Date: 1/3/96

Dangerous Waste Compliance Checklist

Facility			Operating Conference		
Company Name:	USDOE/WHC		Yes	X	No
Contact:	Steve Szendre/Mike Hall		Site Tour		
Title:	SPE/Reg Comp Man	Phone: 373-5719	Yes	X	No
Address:	222-S Lab/200 West Area		Records Review		
Mailing Address:	P.O. Box 1970		Yes	X	No
City:	Richland, WA	Co: _____ Zip: 99352	Closing Conference		
Years on Site:	_____	SIC# _____	Yes	_____	No
Generator/Facility Status:	_____		_____		
Type of Business:	SQG _____	MQG _____	Recycle _____		
	LQG X	TSD _____	Other _____		
Processes that Generate Wastes:	Laboratory Support		_____		
Waste Streams:	Varies		_____		

Ecology		
Site Lead:	Laura Russell, Inspector	Phone/Fax: 509-736-3024
Other Representatives:	Alisa Huckaby, S Area Project Manager	
Time on Site:	10:30 a.m.	Time off Site: 2:00 p.m.
Type of Visit:	Technical Assistance _____	Complaint # _____
	Inspection _____	Other _____

Conditions Not in Compliance	See Page 2, Line #
1) SAA #2716 and Flammable Storage Locker: - Waste within SSA was not marked clearly as "dangerous waste" or "hazardous waste". Not all containers were marked with major risks, per WAC 173-303-200(1)(d) and 200(2)(a)(ii)	9
2) SAA Room 4E: - A container holding dangerous waste was not closed, per WAC 173-303-200(2)(a)(i) and 630(5)(a)	16

Questions, Concerns, Comments
Aisle space concerns in Conex Box #1 and Room 2-D in Lab.

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Conditions Not in Compliance with Dangerous Waste Regulations

Line No.	Violation	WAC 173-303	Line No.	Violation	WAC 173-303
WASTE MANAGEMENT			ADMINISTRATION/RECORDS		
1	Waste Designation	-070(3)	20	Notification & Identification #	-060(2)
2	Failure to offer Waste to TSD	-141	21	Manifesting	-180
3	Spill/Discharges	-145	22	Large Quantity Generator Plans	-200(1)(b), -320 to -360
4	Treatment-by-Generator	-170(3)	23	Recordkeeping Retention Times	-210
5	Accumulation Time Limits	-200(1)(a)	24	Annual Report/Exception Report	-220
6	Accumulation in Containers/Tanks	-200(1)(b), see 630/640	25	Personnel Training Requirements	-330
7	Container/Tank Labeling	-200(1)(c)(d)	26	Preparedness & Prevention	-340
8	Secondary Containment	-200(1)(b)	27	Contingency Plan	-350
9	Satellite Accumulation	-200(2)	28	Emergencies	-360
10	Medium Quantity Generator	-201(c)	29	Permit-by-Rule	-802(5)
11	Ignitable/Reactive/ Incompatible Waste	-395		OTHER DANGEROUS WASTE VIOLATIONS	
12	Used Oil Burned for Energy	-515	30		
13	Use/Mgmt. of Containers	-630	31		
14	- Condition of containers	-630(2)	32		
15	- Compatible containers	-630(4)	33		
16	- Closed containers	-630(5)(a)	34		
17	- Container handling	-630(5)(b)	35		
18	- Weekly Inspections	-630(6)	36		
19	- Secondary Containment	-630(7)	37		

Other Environmental Laws/Concerns

38		
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Follow-up needed by Ecology on Questions & Concerns:

Photos Taken: Yes No
 Samples Taken: Yes No
 Splits Offered: Yes No
 Documents Left: Regulations Step by Step TIMs Focus Sheets
 Additional

Assistance/Enforcement Programs Explained: Yes No

Pollution Prevention Suggestions, Technical Assistance Referrals

Information and assistance on the following environmental programs is available from:

- * Good recycling effort taking place at 2715-S (SAA). Sending recycle waste to Consolidation Center in 400 Area. (Batteries, aerosols, & light bulbs)
- * Installing compactor in Room 2D.

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COMPLIANCE ACTIONS REQUIRED

The actions identified below are necessary in order to be in compliance with Washington Dangerous Waste Regulations (Ch. 173-303 WAC), or other environmental laws or regulations. Please indicate the date an action is completed and initial each item.

No	Action(s) Needed to Achieve Compliance	By When?	Date Completed	Initial	
				RL	WHC
1	Ensure all waste containers are properly labeled and major risks are identified.	1/10/96	1/8/96	RL	RL E
2	Ensure containers are properly closed while accumulating waste, and not being filled.	1/3/96	1/3/96	RL	RL E

Lead Ecology Representative: Laura Russell (signed) Date 1/3/96
Received By: Michael J. Hall (signed) Organization: ECO

(Signature acknowledges receipt only and does not constitute admission that the action(s) identified above are necessary in order to be in compliance with Washington State Law)

Follow-up by Ecology: Phone _____ Letter _____ Revisit _____ None X

(If you have any questions about information in this Checklist, please call the Lead Ecology Representative)

Return Completed Form or Request for Extension -- Upon completion of all actions listed above, please mail a copy of this form to the Washington Department of Ecology at the address circled below. An extension of the deadlines to achieve compliance may be requested. Please make a request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to the Lead Ecology

Representative by _____ (date). Ecology will provide a written approval or denial of your request.

Northwest region
 3190 - 160th Ave S.E.
 Bellevue, WA 98008-5452

Southwest Region
 PO Box 4775
 Olympia, WA 98504-7775

Central Region
 15 West Yakima Ave, Ste 200
 Yakima, WA 98902-3387

Eastern Region
 N. 4601 Monroe, Ste 100
 Spokane, WA 99205-1295

Nuclear Waste Program
 1315 W. 4th Ave.
 Kennewick, WA 99336-6018

Industrial Section/Central
 Programs
 PO Box 47600
 Olympia, WA 98504-7600

This checklist serves as a notice of deficiency for technical assistance visits or a notice of correction for other site visits as provided for in the Washington State Law "Implementing Regulatory Reform", Chapter 403, Laws of 1995.

The Department of Ecology is an equal opportunity agency. If you have special accommodation needs, contact Dave Dubreuil at (306) 407-6721 (Voice) or (360)407-6006 (TDD).