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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

October 18, 1994

Mr. Steven Wisness, Acting Program Manager  
Office of Environmental Assurance, Permits, and Policy  
U. S. Department of Energy  
P.O. Box 550 MSIN A5-15  
Richland, WA 99352

Ms. Treta Ravencraft, Manager 204-AR  
Westinghouse Hanford Company  
P.O. Box 1970 MSIN S5-03  
Richland, WA 99352



Dear Mr. Wisness and Ms. Ravencraft:

Thank you for the assistance of the U S. Department of Energy (USDOE) and Westinghouse Hanford Company (WHC) personnel during the Washington State Department of Ecology's (Ecology) August 3, 1994, inspection of the 204-AR Waste Transfer Facility. 204-AR is operating as an interim status facility under a revised Part-A permit, as required under the Resource Conservation and Recovery Act (RCRA) and the Washington Administrative Code (WAC) Chapter 173-303. The purpose of the inspection was to assess the operating status of the facility according to RCRA and WAC requirements.

The inspection consisted of four facility visits; August 3, August 4, August 15, and August 29, 1994.

The following is a summary of violations and concerns resulting from the inspection:

Violations:

**WAC 173-303-340 Preparedness and prevention . . .** Facilities shall be designed, constructed, maintained and operated to minimize the possibility of . . . any unplanned sudden or nonsudden release of dangerous waste . . . to air, soil, or surface or ground water which could threaten the public health or the environment.

Also, subsection (4)(c)&(d) of WAC 173-303-340 states that facilities must make:  
(c) "Agreements with state emergency response teams, emergency response contractors, and equipment suppliers; and (d) "Where more than one party might respond to an emergency, agreements designating primary emergency authority and agreements with any others to provide support to the primary emergency authority."

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*204-AR was not maintained or operated to minimize the possibility of unplanned releases of dangerous wastes from rail cars or tanker truck trailers which arrive in a leaking condition at the facility. Neither unloading nor operational procedures, nor any contingency planning was in place addressing agreements with emergency response teams or contractors. Agreements designating primary emergency authority and agreements with others to provide support in handling a leaking rail car or truck trailer were not in place at 204-AR. Facility operations and management personnel contacted during the inspection did not know who to call or what steps to take to minimize releases of dangerous waste.*

**WAC 173-303-350 Contingency plan and emergency procedures . . . (2)** Each owner or operator must have a contingency plan at this facility for use in emergencies . . . .

Also, per subsection (3), the contingency plan must contain the items listed in subparts (a) through (f).

Also, per subsection (4)(a), copies of the contingency plan shall be maintained at the facility.

Also, per subsection (5), the contingency plan must be immediately amended to accommodate changes in emergency coordinators, emergency equipment, or if the facility permit is revised.

*During the inspection the contingency plan for Tank Farms, WHC -IP-0263-TF, Sept. 28, 1990, was presented as containing the contingency plan for 204-AR. The reviewed plan failed to meet the requirements of subsections (3)(a) through (f), (4)(a), or (5)(a)(b)(d) & (e) of WAC 173-303-350.*

**WAC 173-303-070 Designation of dangerous waste . . . (b)** The procedures in this section are applicable to any person who generates a solid waste . . . . Any person who must determine whether or not his solid waste is designated must follow the procedures set forth in subsection (3) of this section.

*Rail car and truck trailer waste transfer operations in 204-AR generate solid waste in the form of rags, absorbent material, and plastic sheeting used to contain any leaks, spills, or drips that may result from transfer activities. Section 5.8.16 of truck trailer transfer procedure for 204-AR (TO-290-120, Rev. B-O), directs operators to, "remove and dispose of rags, absorbent material, and plastic from spillboxes." Section 5.7.8 of rail car transfer procedure for 204-AR (TO-290-130, Rev. D-O), directs operators to, "Remove plastic sheeting, paper, and absorbent pads or rags from the Tank Car Cupola and Platform." These transfer procedures do not include a limit which, if exceeded, would then require the debris and solid wastes generated by the transfer process be subject to designation procedures per WAC 173-303-070.*

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Concerns:

- i. The surface coating on the floor of the unloading room is chipped and peeling, particularly on the west end of the facility. Also, a grate cover for the southernmost drain in the unloading room was missing, subjecting the waste pipe underneath to clogging and presenting a tripping hazard.

*The grate should be replaced immediately, and a time established within the next twelve months to resurface the floor of the unloading room in 204-AR.*

- ii. The training plan for the 204-AR facility was contained in, "The Tank Farms Dangerous Waste Training Plan," document number WHC-SDF-WM-TR-026, Rev. 1, June, 1994. 39301  
The plan listed courses no longer available and contained a training table matrix, Table 4, listing required training for DST employees which are no longer applicable.

*The training plan should be revised immediately to reflect applicable training per job category and employee in an understandable format. Means to make immediate updates to the training plan should be in place to accommodate changes in personnel or training requirements.*

- iii. WAC 173-303-390 Annual reports . . . (2) The report must cover facility activities during the previous year and must include, . . . : (d) A description and the quantity of each dangerous waste the facility received during the year.

Facility activities at 204-AR include increasing waste volumes discharged from 204-AR to DSTs over waste volumes received at 204-AR from generators through addition of flushing and sluicing waters, as well as additions of caustic (NaOH) and nitrite (NaNO<sub>2</sub>) solutions. 204-AR submitted both a revised Form 4, Generator Annual Dangerous Waste Report, and a revised Form 5, Waste Management Facility Annual Dangerous Waste Report, for calendar year 1993. Both forms indicated identical amounts of waste, 416,350 Kg, as being the reportable quantity for the respective forms, however, much more waste was transferred from 204-AR than received.

*Annual reporting must accurately reflect the volumes of wastes managed at the facility and should coincide with volumes shipped from generators to 204-AR, as well as volumes received by DST's from 204-AR. Annual reporting for 1994 should accurately reflect the management activities at 204-AR including the waste volume increases resulting from treatments performed at 204-AR.*

In order to correct the violations identified in this letter, please complete the following corrective actions within the time frames specified. Please be advised that failure to correct these noncompliant items may result in the issuance of an administrative order and/or penalty under RCW 70.105.080 and/or (Hazardous Waste Management).

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It should be noted that by the time the inspection had been completed the missing drain cover in the unloading room had been replaced and I was advised the latest revision of the Tank Farms Contingency Plan and Training Plan would be available in October 1994. The following corrective actions reflect these conditions.

This voluntary compliance letter is being issued pursuant to the authorities granted to Ecology by RCW 70.105 (Hazardous Waste Management).

#### Corrective Action #1

Within thirty (30) days of receipt of this letter, USDOE and WHC must identify the primary emergency authority responsible for responding to leaks and/or spills from rail cars or tank truck trailers arriving at 204-AR. The contingency plan for 204-AR must be revised as necessary to include the name and telephone number of the primary emergency authority responsible for responding to leaks and/or spills discovered at 204-AR.

#### Corrective Action #2

Within thirty (30) days of receipt of this letter, USDOE and WHC must revise, as necessary, the the contingency plan for 204-AR to satisfy all requirements of WAC 173-303-350. Some general contingency plan requirements for 204-AR may be satisfied per section II.A of the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, issued August 28, 1994 (Site Wide Permit).

However, information specific to the 204-AR facility must be maintained within the 204-AR facility and the general requirements included by reference to the Site Wide Permit. This facility specific contingency plan information may be included in the building emergency plan for 204-AR, and must contain at least the following:

- Name and telephone number of primary emergency responders per corrective action #1 above.
- Current name and telephone number of Emergency Coordinator and his alternates per WAC 173-303-350(d).
- A description of the actions which shall be taken should a dangerous waste shipment arrive at the 204-AR facility which is damaged or otherwise presents a hazard to public health and the environment.
- A description of emergency equipment and its locations throughout the facility.
- Amendments to the contingency/building emergency plan per WAC 173-303-350(5).

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- Locations of all emergency communications devices per WAC 173-303-350(2).

### Corrective Action #3

Within thirty (30) days of receipt of this letter, USDOE and WHC must include limits in the transfer procedures for rail and tank truck dangerous waste transfers at 204-AR that, if exceeded, would require that rags, absorbent materials, and solid wastes resulting from transfer activities undergo dangerous waste designation determination per WAC 173-303-070. The 204-AR facility must be maintained to manage these materials as dangerous waste should they designate.

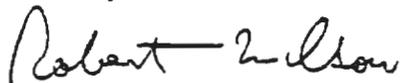
### Concerns

The concerns regarding the Tank Farms Training Plan will be reviewed during the follow up inspection to occur at the conclusion of the compliance schedule contained herein.

The concerns regarding annual reporting will be reviewed during the 1994 reporting period.

Should you have any questions, or require clarification on any of the items in this compliance letter or the enclosed "Certificate of Compliance," please do not hesitate to call me at (509) 736-3031. Please complete and submit the enclosed "Certificate of Compliance to Ecology by October 29, 1994.

Sincerely,



Robert Wilson, RCRA Compliance Inspector  
Nuclear Waste Program

RW:mf  
Enclosure

Please complete and return to Robert Wilson, Washington State Department of Ecology, P.O. Box 1386, Richland, Washington 99352, by October 29, 1994.

### CERTIFICATE OF COMPLIANCE

As a legal representative of the U. S. Department of Energy, I certify to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on September 29, 1994, with regard to the inspection of the 204-AR Waste Transfer Facility located on the Hanford reservation, Facility ID Number WA7890008967 as shown below.

### COMPLIANCE STATUS

Corrective Action	Date Due	Date Completed	Initials	Comments
#1	11/17/94			
#2	11/17/94			
#3	11/17/94			

\_\_\_\_\_  
Signature, USDOE-RL Representative

\_\_\_\_\_  
Date