



Department of Energy

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

0024376

9203194

92-RPB-224

SEP 21 1992



Mr. W. M. Hedgebeth
PCB Team Leader
Toxic Substances Section
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Hedgebeth:

U.S. ENVIRONMENTAL PROTECTION AGENCY REVIEW OF THE 1991 POLYCHLORINATED BIPHENYL INSPECTION

Pursuant to your letter to Mr. R. D. Izatt dated August 26, 1992, the U.S. Department of Energy Richland Field Office herewith transmits the additional information requested to complete your review of the 1991 Polychlorinated Biphenyl Inspection of the Hanford Site.

If you have any questions, please contact me or Ms. A. L. Rodriguez of my staff on (509) 372-0277.

Sincerely,

James D. Bauer
James D. Bauer, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:ALR

Enclosure

- cc w/o encl:
- W. J. Bjorklund, PNL
- H. C. Boynton, WHC
- P. Boys, EPA
- P. T. Day, EPA
- B. G. Erlandson, WHC
- R. J. Landon, WHC
- R. E. Lerch, WHC
- M. M. McCarthy, WHC
- F. J. Orsag, WHC
- J. A. Rivera, WHC
- J. O. Skolrud, WHC
- D. R. Tangarone, EPA
- H. T. Tilden II, PNL



RESPONSE TO EPA REQUEST FOR
ADDITIONAL INFORMATION

Comment 1: It was noted during the inspection that a pint bottle of arochlor in benzene was being held in the "305B" storage area for research applications. Please confirm the status and intended use of this material.

Response: No further use was found for the material. Therefore, a removed from service date was assigned on February 5, 1992. The pint bottle was shipped June 24, 1992, to Burlington Environmental (EPA ID# WAD092300250) in Washougal, Washington on Manifest 61592. Burlington Environmental (a waste broker) will manifest the PCB waste to the disposal facility.

Comment 2: During the inspection, two transformers were observed outside of the 212P Building, identified as "E281L" and "E281I." We are unable to locate any record of these transformers in the documentation obtained. The transformers were observed to be leaking during the inspection. Do you have analytical results for these transformers? If not, or if analysis shows the transformers to contain 50 parts per million PCB or greater, has any cleanup of the leaks on these transformers occurred? If so, please describe the actions taken to clean up the leaks, including dates and times of such activity.

Response: The PCB concentrations were 21 parts per million (ppm) and less than one ppm for E281L and E281I respectively. All transformers were removed from the field and taken to a holding area outside the 212-P building for retention, and determination. These units were drained, repaired and retained as ready spares.

Comment 3: During the inspection, three PCB rectifier transformers were observed in the 189D Building which reportedly had not been used for about a year. Please confirm the out-of-service date for these transformers, their status, and, if stored for disposal, the arrangements for disposal which have been made. I understand that walls of the building had to be removed to get the transformers out.

Response: The three PCB rectifier transformers, located in the 189D Building (185-D), are intended for reuse and are considered in service.

RESPONSE TO EPA REQUEST FOR
ADDITIONAL INFORMATION
(Continued)

Comment 4: During the inspection, a PCB-contaminated transformer, identified as "C416E," was observed to be leaking. Please advise what steps were taken to address the leak, including dates of initial and final cleanup, and of repair to correct the leaking.

Response: The leak was repaired and cleanup was initiated and completed on October 1, 1991. The lower drain valve was tightened and the contaminated surface of the transformer was rinsed with solvent. The transformer was inspected the following week to verify that the leak repair was satisfactory.

Comment 5: A review of the annual document logs obtained during the inspection, and of the amended annual document logs submitted with your letter of March 5, 1992, indicate that on December 31, 1992, there were 23 PCB transformers remaining in service at the end of the year. However, inspection records seem to indicate that there were 24 PCB transformers in service at least through most of 1991. The one PCB transformer which appears on the inspection records, but which does not seem to be included in the inventory of in-service PCB transformers for 1990 (but was included in the inventory for 1989), is a transformer identified as having Serial Number D42722F, located in "100-K." None of the manifests obtained subsequent to the inspection seem to indicate that this transformer had been disposed of. What is the status of this transformer?

Response: Transformer D42722F is still in service. In 1990, Transformer D42722F was transferred from a nonradioactive status to a radioactive status due to its location in a radiation zone. Thus for reporting purposes, this transformer was reported in the radioactive portion of the 1990 and 1991 PCB logs. There are still 24 transformers in service, 23 are reported in the nonradioactive part of the log and 1 is reported in the radioactive section of the log. See the attached summary sheets.

U.S. Department of Energy - Richland Operations
PCB ANNUAL DOCUMENT LOG (Non-Radioactive)
PCB Summary - Part 1

9206327B R1
Attachment
Page 3 of 4

Generator: Department of Energy, Richland Operations
Address: P.O.Box 550, 2355 Stevens Richland, WA 99352 EPA ID# WA7890008967
PCB Storage Location: Building 212-P / 200 North Area Year Ending: 12/31/91

PLACED INTO STORAGE FOR DISPOSAL

TOTAL NUMBER OF PCB ARTICLES	TOTAL PCB WEIGHT
<u>0</u> PCB Capacitors	<u>0</u> Kilograms
<u>0</u> PCB Transformers	<u>0</u> Kilograms
<u>238</u> PCB Contam. Elec. Equip.	<u>0</u> Kilograms
	Total <u>0</u> Kilograms
TOTAL NUMBER OF PCB ARTICLE CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>1</u> PCB Article Containers	<u>77</u> Kilograms
TOTAL NUMBER OF PCB CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>57</u> PCB Containers	<u>8,375</u> Kilograms
BULK PCB WASTE	TOTAL WEIGHT
	<u>37,569</u> Kilograms

TRANSPORTED FOR DISPOSAL

TOTAL NUMBER OF PCB ARTICLES	TOTAL PCB WEIGHT
<u>0</u> PCB Capacitors	<u>0</u> Kilograms
<u>0</u> PCB Transformers	<u>0</u> Kilograms
<u>230</u> PCB Contam. Elec. Equip.	<u>0</u> Kilograms
	Total <u>0</u> Kilograms
TOTAL NUMBER OF PCB ARTICLE CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>0</u> PCB Article Containers	<u>0</u> Kilograms
TOTAL NUMBER OF PCB CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>53</u> PCB Containers	<u>5,979</u> Kilograms
BULK PCB WASTE	TOTAL WEIGHT
	<u>31,511</u> Kilograms

REMAINING IN SERVICE AT THE END OF THE YEAR*

TOTAL NUMBER OF PCB TRANSFORMERS	TOTAL PCB WEIGHT
<u>23</u> PCB Transformers	<u>83,515</u> Kilograms
TOTAL NUMBER OF PCB CAPACITORS	
<u>0</u> Large High Voltage	
<u>43</u> Large Low Voltage	
<u>43</u> Total	
PCB CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>80-04</u> ID No. <u>Pyranol. make-up</u> Contents	<u>295</u> Kilograms

*For location of items remaining in service, please see PCB Inventory.

The PCB Inventory (Part 2) attached to this Summary (Part 1) completes the Annual Document Log.

Generator: Department of Energy, Richland Operations
 Address: P.O.Box 550, 2355 Stevens Richland, WA 99352 EPA ID# WA7890008967
 PCB Storage Location: Hanford Central Waste Complex Year Ending: 12/31/91

PLACED INTO STORAGE FOR DISPOSAL

PCB ARTICLES	TOTAL PCB WEIGHT
<u>0</u> PCB Capacitors	<u>0</u> Kilograms
<u>0</u> PCB Transformers	<u>0</u> Kilograms
<u>0</u> PCB Contam. Elec. Equipment	<u>0</u> Kilograms
Total	<u>0</u> Kilograms

PCB ARTICLE CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>0</u> PCB Article containers	<u>0</u> Kilograms

PCB CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>59*</u> PCB Solids (Dirt, Debris, Rags)	<u>6501.39</u> Kilograms

BULK PCB WASTE	TOTAL WEIGHT
	<u>0</u> Kilograms

TRANSPORTED FOR DISPOSAL

PCB ARTICLES	TOTAL PCB WEIGHT
<u>0</u> PCB Capacitors	<u>0</u> Kilograms
<u>0</u> PCB Transformers	<u>0</u> Kilograms
<u>0</u> PCB Contam. Elec. Equipment	<u>0</u> Kilograms
Total	<u>0</u> Kilograms

PCB ARTICLE CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>0</u> PCB Article Containers	<u>0</u> Kilograms

PCB CONTAINERS	TOTAL PCB WASTE WEIGHT
<u>0</u> PCB Containers	<u>0</u> Kilograms

BULK PCB WASTE	TOTAL WEIGHT
	<u>0</u> Kilograms

REMAINING IN SERVICE AT THE END OF THE YEAR **

PCB TRANSFORMERS	TOTAL PCB WEIGHT
<u>1</u> PCB Transformers	<u>2571</u> Kilograms

PCB CAPACITORS	
<u>16</u> Large High Voltage	
<u> </u> Large Low Voltage	
<u>16</u> Total	

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. D. Bauer, RL J. A. Dawson, WHC	W. M. Hedgebeth, EPA	Incoming: 9203194 (XREF:9206327B R1)

Subject: U.S. ENVIRONMENTAL PROTECTION AGENCY REVIEW OF THE 1991
POLYCHLORINATED BIPHENYL INSPECTION

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		D. L. Barron	S2-62	
		H. C. Boynton	N3-11	
		G. D. Carpenter	B2-16	
		J. A. Dawson	B2-20	
		C. K. DiSibio	B3-03	
		B. G. Erlandson	B2-19	
		C. J. Geier	B2-19	
		G. W. Jackson, Assignee	B2-35	
		R. J. Landon	B2-19	
		R. E. Lerch	B2-35	
		P. J. Mackey	B3-15	
		M. M. McCarthy	N3-13	
		H. E. McGuire, Level 1	B3-63	
		F. J. Orsag	S2-62	
		J. A. Rivera	B2-16	
		G. S. Robinson	B2-19	
		J. O. Skolrud	B2-20	
		EDMC	H4-22	
		RRG File/LB	B2-20	



Enclosure is the same as 9206327B R1