



START

Department of Energy

Richland Field Office
P.O. Box 550

Richland, Washington 99352

AUG 20 1993



93-TOB-165

Mr. Steven V. Moore
Dangerous Waste Compliance Inspector
Nuclear and Mixed Waste Management Program
State of Washington
Department of Ecology
7601 West Clearwater Avenue
Suite 102
Kennewick, Washington 99336

Dear Mr. Moore

DANGEROUS WASTE COMPLIANCE INSPECTION OF SINGLE-SHELL TANK 241-BX-111

- References:
- (1) Letter, S. V. Moore, Ecology, to J. D. Wagoner, RL, and T. M. Anderson, WHC, same subject, dated May 24, 1993. 28256
 - (2) Letter S. V. Moore, Ecology, to J. D. Wagoner, RL, and T. M. Anderson, WHC, "Status of May 24, 1993 Dangerous Waste Compliance Inspection Voluntary Compliance Letter for Single-Shell Tank 241-BX-111," dated June 17, 1993. 28867
 - (3) Letter, R. E. Gerton, RL, to S. V. Moore, same subject, dated July 9, 1993. ✓

In Reference 1, the State of Washington Department of Ecology (Ecology), cited a number of alleged non-compliances with the Washington Administrative Code Dangerous Waste Regulations (Chapter 173-303) and requested that five (5) items be completed to resolve these non-compliances. Since receipt of the letter, the U.S. Department of Energy, Richland Operations Office (RL) representatives have met with you several times to further identify the specific deliverables and due dates for the items. One of the five items (item 5) listed in Reference 1 addresses the need to develop and implement contingency plans and emergency procedures, and to develop and put in place emergency equipment adequate to respond to a release of waste or other emergency circumstances from any of the tanks at Hanford. This was to be completed by August 22, 1993.

Proposed Tri-Party Agreement (TPA) milestones that provide for preparation of emergency pumping procedures for the unstabilized single-shell tanks (SST's) are currently being negotiated with Ecology. In addition, milestones have also been proposed for repairs and improvements to emergency pumping equipment and systems. RL believes that the TPA is the proper mechanism for addressing this issue for the SST's. In reference two, you concurred that the present Tri-party Agreement negotiations is the proper means to resolve large, tank-farm wide improvements, such as these. RL believes that this issue can be resolved in the on-going TPA negotiations.

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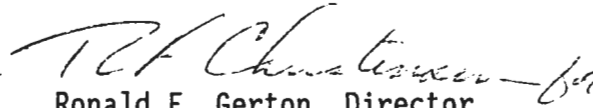
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SST tank leaks will be redefined as an emergency situation in tank farm Building Emergency Plans. Emergency Response Guides for specific accidents or incidents will also be prepared. Both the emergency plans and the emergency response guides will be revised to meet the requirements of WAC Sections 350 and 360. Procedures for all tank farms will be prepared. These procedures will then be made available for your review. It is believed the submission of the response guides and building emergency plans for your review will satisfy the commitment in item 5 of Reference 1. Consistent with our discussions, RL understands that an extension for completion of this work to October 31, 1993 was provided by you on the original completion date (August 22, 1993).

RL is awaiting your comments on the level monitoring administrative procedure submitted in reference three.

Should you have any questions, please contact Mr. Guy E. Bishop of my staff at 372-1856.

Sincerely,


Ronald E. Gerton, Director
Tank Waste Storage Division

cc
T. M. Anderson, WHC

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: RE Gerton/RL Addressee: SV Moore/Ecology Correspondence No.: Incoming: 9304201.7

Subject: DANGEROUS WASTE COMPLIANCE INSPECTION OF SINGLE-SHELL TANK 241-BX-111

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