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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

April 7, 1993

Mr. John Wagoner, Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550 MSIN A7-50
Richland, Washington 99352

Mr. William R. Wiley, Director
Pacific Northwest Laboratories
P.O. Box 999 MSIN K1-46
Richland, Washington 99352



Dear Messrs. Wagoner and Wiley:

Re: Dangerous Waste Compliance Inspection of the 305-B Storage Facility

Thank you for the assistance of U.S. Department of Energy (USDOE-RL) and Pacific Northwest Laboratories (PNL) personnel during the July 16 and July 23, 1992 inspections and subsequent corrective actions at the 305-B storage facility (305-B).

During the first inspection, Washington State Department of Ecology (Ecology) inspectors identified several areas of non-compliance with the Dangerous Waste Regulations (Chapter 173-303 WAC). The inspectors discussed the problem areas with PNL representatives and verbally asked that they be resolved. After the second inspection showed continued non-compliance, Ecology issued a written voluntary compliance letter.

This letter serves to notify both USDOE-RL and PNL that Ecology considers the actions requested in my October 30, 1992 compliance letter to be resolved. The actions have either been satisfactorily completed or will be readdressed after 305-B obtains final facility status.

I would also like to stress the continued need for Ecology, USDOE-RL, and Hanford contractors to strive for good communication and working relationships to promote problem solving and minimize unnecessary conflict.

9413137.1709

Messrs. Wagoner and Wiley

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April 7, 1993

Should you have questions or require clarification on any items in this letter, please do not hesitate to call me at (509) 736-3000 or Mr. Steve Moore at (509) 736-3023.

Sincerely,

David Nylander

David Nylander, Office Manager
Nuclear and Mixed Waste Management Program

DN:SM:sr

cc: James D. Bauer, USDOE-RL
J.J. Sutey, USDOE-RL
Elizabeth Bowers, USDOE-RL
Dave Jones, USDOE-RL
Paul J. Krupin, USDOE-RL
Terry Provost, USDOE-RL
William J. Bjorklund, PNL
Harold Tilden, PNL
Kyle Webster, PNL

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NUCLEAR AND MIXED WASTE MANAGEMENT PROGRAM
HANFORD PROJECT
FOLLOW-UP DANGEROUS WASTE INSPECTION
305-B STORAGE FACILITY

1. Introductory information:

Name and Address of Owner:
U. S. Department of Energy (DOE-RL)
Richland Operations Office
P.O. Box 550
Richland, WA 99352

ID Number: WA7890008967

Date and Time of Inspection:
(March 19, 1993 1300 hours)

Operator:
Pacific Northwest Laboratories (PNL)
P.O. Box 999
Richland, WA 99352

Contact Person and Phone number:
Mr. Kyle Webster (PNL)
(509) 376-7688

Date of Inspection Report:
(April 7, 1993)

Mr. Dave Jones (DOE-RL)
(509) 376-7947

Type of and Reason for Inspection:

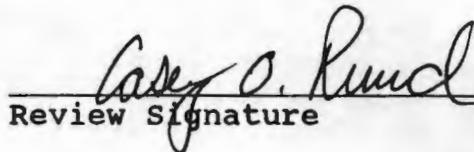
Follow-up inspection to assess completion of voluntary compliance actions from an October 30, 1992 compliance letter.

Report Prepared by: Steve Moore

Inspection Conducted By: Steve Moore



Signature



Review Signature

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The intent of my follow-up inspection was to verify completion of corrective action items asked for by Ecology on October 30, 1992. The inspection focused on the facilities compliance with the requirements of Chapter 173-303 WAC as an interim status facility.

On March 18, 1993, I called Mr. Kyle Webster, the 305-B facility manager. I told him I would be going to 305-B to perform an assessment of completion of the corrective actions and asked when he would be available. He said I could go anytime, and we agreed on March 19, 1993, at 1300 hours.

Description of Inspection 3/19/93

I arrived at the 300 Area west gate at 1245 hours and walked into the 300 Area through the unmanned guardhouse. I arrived at the 305-B storage facility at 1255 hours, rang the doorbell, and was let in. Mr. Webster and Mr. Bjorklund were waiting in Mr. Webster's office. I asked if anyone else was coming to the inspection. They said Mr. Glenn Thornton would be coming, but we could start without him.

I explained I would be performing an assessment to determine the status of the action items from the October 30, 1992 compliance letter. If the action items were satisfactorily completed, I would be responsible for closing out the 305-B inspection. Because I had not been a part of the interactions with the facility since the July inspections, I needed to perform this assessment to determine if the compliance actions were complete. Mr. Thornton arrived and I began reviewing the compliance letter and asked the three facility representatives to show proof the actions were completed. After finishing the review of the compliance letter, I performed a short facility inspection to verify completion of the actions.

The following is my assessment of the five corrective actions:

1. Within thirty (30) calendar days of receipt of this letter, PNL shall submit to Ecology a schedule to sample and designate container #13040.

In their December response to the compliance letter, PNL and DOE-RL disputed the findings that generated this corrective action. The response explained the drum was shipped before receiving the Ecology compliance letter. The December response contends the designation of the waste was accurate and the container was in satisfactory condition for storage. The container action form identified by Ecology during the July inspections was issued to prepare the waste for transportation off site and not to repackage the waste for continued storage.

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In the December response, PNL and DOE-RL disputed the finding that waste containers stored at 305-B were not properly labeled. The primary disputes were that Ecology does not understand the operations at 305-B and that Ecology inappropriately interpreted the applicability of the cited regulations.

PNL and DOE-RL failed to acknowledge the conditions that led to the violations. Labpacked RMW had been transferred to new containers two days before the first inspection and the new containers were not labeled. The containers were not labeled the following week either. WAC 173-303-630(3) is very specific about the requirement to label containers after transfer of wastes.

PNL and DOE-RL objected to the compliance letter fact sheet statement that a dented container in storage at 305-B was "not in good condition". Given the condition of the drum, the information provided to Ecology during the inspection, the Drum Action Sheet on the drum that stated the drum needed repackaging, and the fact the drum was overpacked before shipping the waste off-site, there is adequate justification for determining the drum was not in good condition. PNL and DOE-RL properly identified a mistake Ecology made in quoting WAC 173-303-630(2) instead of the applicable and nearly identical 40 CFR 265.171.

305-B maintains a data base of all DW stored in the facility. Labels for containers are printed from the data base information. There were no DW containers identified during this assessment that were not labeled adequately.

RMW containers do not receive the same type of labeling because RMW is not tracked by the same database. A variety of labeling is used for RMW including: 1) Felt tip markers, 2) Hazardous waste stickers, and 3) PNL specific labels. I did not identify any unlabeled RMW containers during this assessment.

Conclusion: Action satisfactorily completed

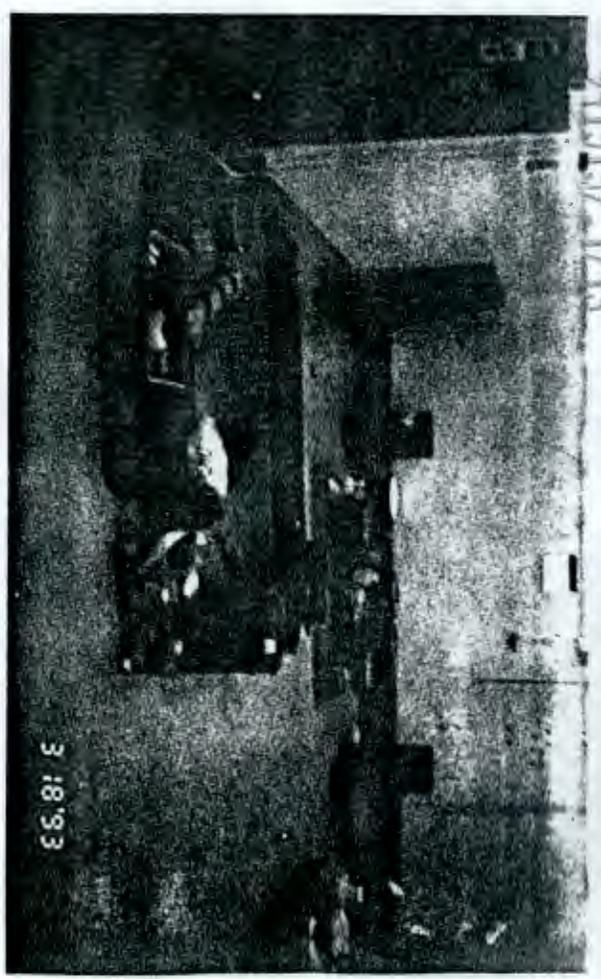
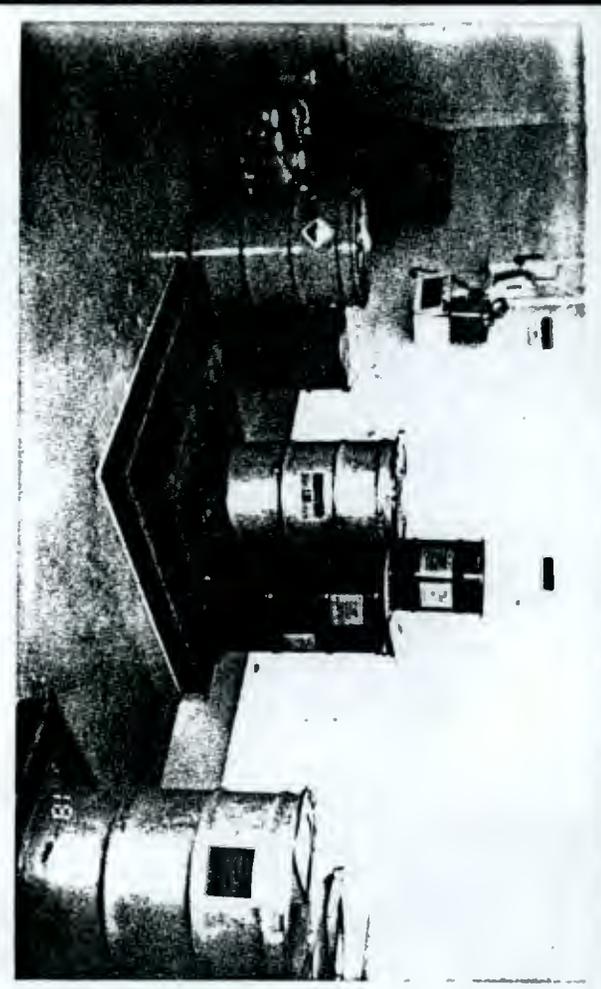
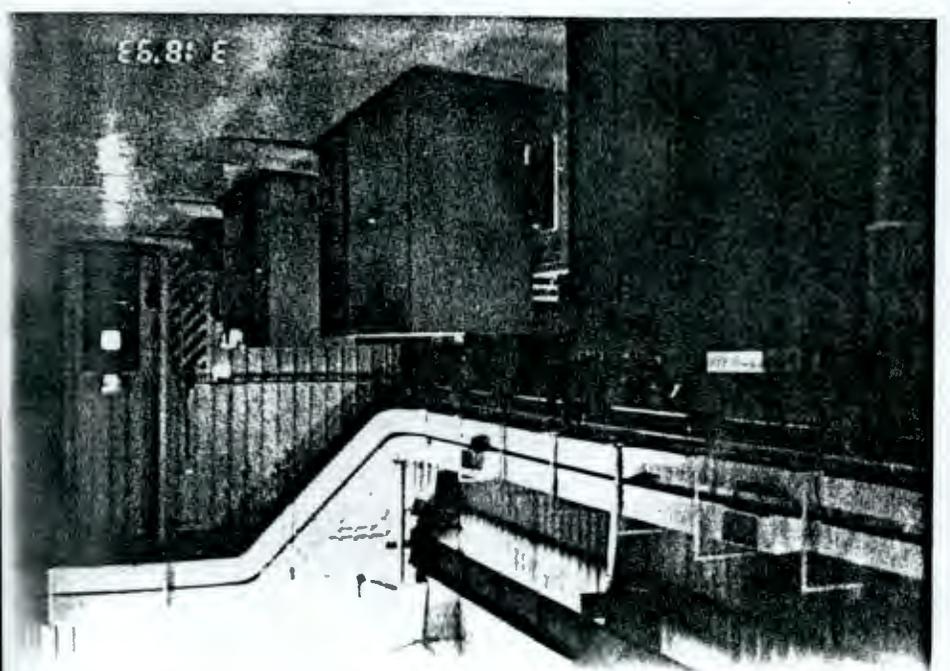
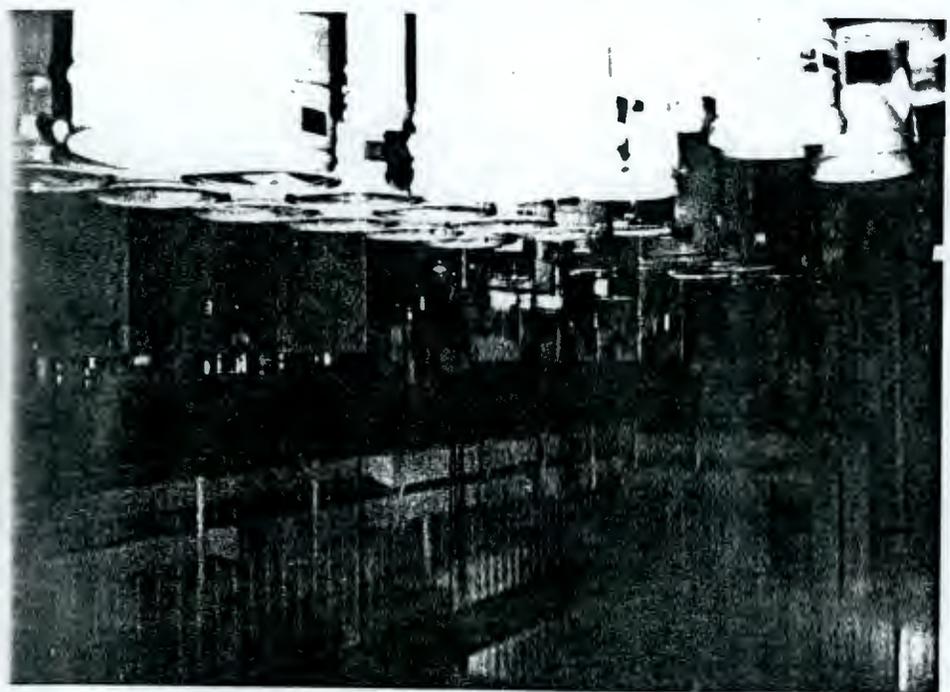
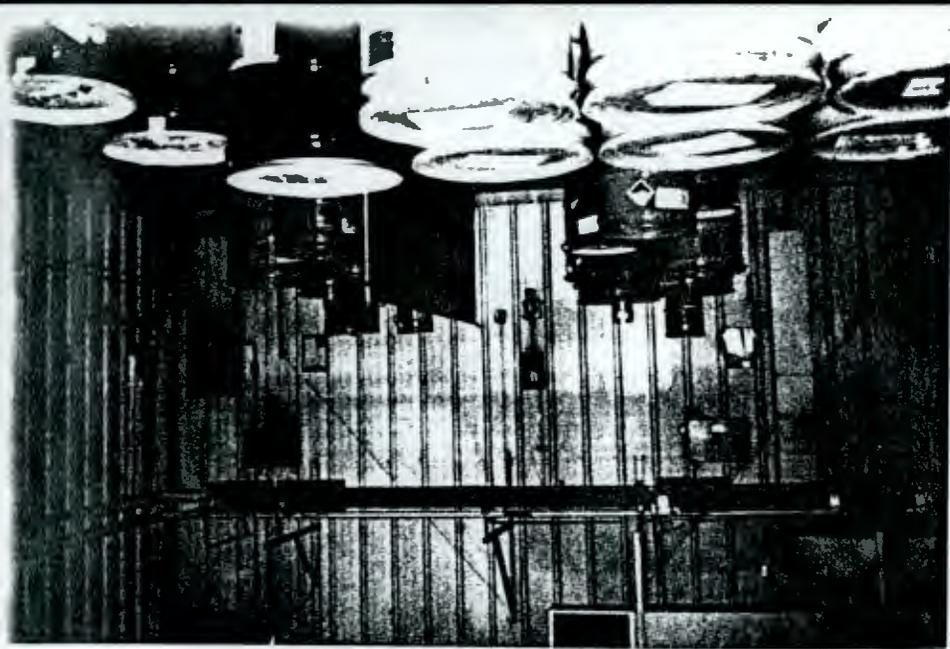
5. Within thirty (30) calendar days of receipt of this letter, PNL shall verify compliance with WAC storage requirements under the Uniform Fire Code.

In the December response PNL and DOE-RL objected to an "alleged" violation of WAC 173-303-630(8)(b) because 305-B is an interim status facility and the cited regulation does not apply until 305-B obtains final facility status. PNL and DOE-RL failed to acknowledge that they claim to comply with this and many other final facility standards. They have also failed to address how compliance with uniform fire code requirements will be met when they exceed the "conservative" limits they self impose. The intent of this corrective action item appears to have been to identify a deficiency to be resolved before a final permit would be issued.

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305-B FOLLOW-UP INSPECTION
ATTACHMENT A
PHOTOGRAPH LOG

9413/37.1714



305-B FOLLOW-UP INSPECTION
ATTACHMENT B
FIELD NOTES

9413137.1716

Item 2 - Current building emergency plan posted -

Webster is #1. I asked how/when they update the list. They said it gets updated annually. I said they should look at a process to update it when the WAC requires it i.e., plan fails and when new people are added or old ones move. Bjorklund will put it on his monthly review form.

Item 3 - Inventory was provided in December report. Gretz & Laura say it was OK. 6

Item 4 - Went to high bay -

Recent shipment - most bays/shelves empty

Drums/containers have 305-B stickers -

Bulking module - has paint can emptier inside.

Paint can loaded => drum not closed

Drum not labeled. I told Webster and

Don K laepas to fix it.

Took 3 pictures

Cell 7 - RMW.

Containers labeled with felt tip, HW sticker, 305-B sticker (monobrium). Many containers in 5 gal paint cans. - compatible? 2^o containment?

PHOTOGRAPH LOG

Photographer(s): 345-B Steve Moore (SUM)

Photo #	Date taken	Location and description of photo.
1	1410 3/14/93	High Bay Facing North
2	1410 3/14/93	High Bay Facing North
3	1410 3/18/93	High Bay Facing East
4	1420 3/18/93	RMW Bay East
5	1420 3/18/93	RMW Bay East
6		
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305-B FOLLOW-UP INSPECTION
ATTACHMENT C
MANIFEST FOR CONTAINER # 13040

9413137.1719

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.

Manifest Document No.

22. Page

Information in the shaded areas is not required by Federal law.

W1A17181910101018191617119101813

4 of 4

23. Generator's Name

U.S. Department of Energy/Battelle PNL

(509) 376-4293 (Mick Carlson)

24. Transporter Company Name

25. US EPA ID Number

26. Transporter Company Name

27. US EPA ID Number

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers No. Type

30. Total Quantity

31. Unit Wt/Vol

a. Hazardous Waste, Solid, n.o.s.
ORM-E NA9189

01 01 3 D1 M 01 01 11 19 P

b. Non-RCRA Waste Liquid (Washington State Waste)

01 01 2 D1 M 01 01 11 25 P

c. Non-RCRA Waste Solid (Washington State Waste)

01 01 4 D1 M 01 01 41 08 P

d. Non-Regulated Waste

01 01 5 D1 M 01 11 01 50 P

e. "RQ" Waste Flammable Liquid, n.o.s. (D001)
UN1993

01 01 2 D1 M 01 01 41 45 P

f.				
g.				
h.				
i.				

8. Additional Description
 814291 (5) ...
 4451 (5) ...
 81BNW-788 (55) ...
 8 MRC-157 (55) ...

32. Special Handling Instructions and Additional Information

a.-e. WMDS #194572 Contract #165601-A-C7 Work Order #15
 c. Add MRC-132 (55) Load #71740
 Truck Placarded "Dangerous/Flammable Solid-DWM" @ Departure.
 24 HOUR EMERGENCY PHONE (509)375-2400.

33. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date
		Month Day Year

34. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date
		Month Day Year

35. Discrepancy Indication Space

9415137.1720

F003,
F005,
D018.

F005,
F003,
WP01.

8-1292 407

SHIPMENT E-11

9413137.121

1	A	B	C	D	E	F	G
2	1830/1831	DRUM #	MATERIAL DESCRIPTION	G.W. (lbs)	DRUM SIZE (gallons)	PROFILE #	MANIFEST #
3	1830	354L ✓	NON RCRA LIQ.	110	30	194572	19083
4	1830	359L ✓	FLAM. SOLID	157	55	194572	19083
5	1830	372L ✓	CORROSIVE LIQ.	17	5	194572	19083
6	1830	400L ✓	HAZ. WASTE LIQ.	120	30	194572	19083
7	1830	426L ✓	FLAM. LIQ., CORROSIVE	248	55	194572	19083
8	1830	427L ✓	TETRAHYDROFURAN	15	5	194572	19083
9	1830	429L ✓	HAZ. WASTE SOLID	9	5	194572	19083
10	1830	430L ✓	ORM-B	15	5	194572	19083
11	1830	433L ✓	HAZ. WASTE SOLID	47	30	194572	19083
12	1830	434L ✓	ORM-A	10	5	194572	19083
13	1830	435L ✓	AMMONIUM HYDROXIDE 5%	9	5	194572	19083
14	1830	436L ✓	FORMALDEHYDE	10	5	194572	19083
15	1830	437L ✓	OXIDIZER, CORROSIVE, LIQ.	220	55	194572	19083
16	1830	438L ✓	BENZOYL PEROXIDE	10	5	194572	19083
17	1830	439L ✓	PHOSPHOROUS TRICHLORIDE	14	5	194572	19083
18	1830	443L ✓	ALKALINE LIQ.	66	20	194572	19083
19	1830	444L ✓	CORROSIVE SOLID	33	10	194572	19083
20	1830	445L ✓	NON RCRA LIQ.	15	5	194572	19083
21	1830	446L ✓	OXIDIZER SOLID	95	30	194572	19083
22	1830	450L ✓	HAZ. WASTE LIQ.	60	15	194572	19083
23	1830	13040L ✓	COMBUSTIBLE LIQ.	130	55	194572	19083
24	1830	SEQ-71 ✓	COMBUSTIBLE LIQ.	11	5	194572	19083
25	1830	SEQ-118 ✓	MAGNESIUM PERCHLORATE	10	5	194572	19083
26	1830	SEQ-119 ✓	POTASSIUM CYANIDE, SOLID	10	5	194572	19083
27	1830	BNW-726	HAZ. LIQ.	11	5	194572	19083
28	1830	BNW-808 ✓	HAZ. WASTE SOLID	63	30	194572	19083
29	1830	MRC-011 ✓	NON REG. WASTE	250	55	194572	19083
30	1830	MRC-30 ✓	NON RCRA SOLID	13	5	194572	19083
31	1830	MRC-84 ✓	FLAM. LIQ.	25	10	194572	19083
32	1830	MRC-87 ✓	HAZ. WASTE LIQ.	15	5	194572	19083
33	1830	MRC-106 ✓	NON REG. WASTE	173	55	194572	19083
34	1830	MRC-120 ✓	HAZ. WASTE LIQ.	15	5	194572	19083
35	1830	MRC-124 ✓	HAZ. WASTE LIQ.	16	10	194572	19083
36	1830	MRC-129 ✓	CHROMIC ACID MIXTURE DRY	140	55	194572	19083
37	1830	MRC-130 ✓	CHROMIC ACID MIXTURE DRY	162	55	194572	19083
38	1830	MRC-131 ✓	CHROMIC ACID MIXTURE DRY	129	55	194572	19083
39	1830	MRC-132 ✓	NON RCRA SOLID	200	55	194572	19083
40	1830	MRC-138 ✓	NITRIC ACID >40%	10	5	194572	19083
41	1830	MRC-140 ✓	HAZ. WASTE LIQ.	43	10	194572	19083
42	1830	MRC-145 ✓	FLAM. LIQ.	11	5	194572	19083
43	1830	MRC-146 ✓	FLAM. LIQ. CORROSIVE	45	15	194572	19083
44	1830	MRC-147 ✓	CORROSIVE SOLID	27	10	194572	19083
45	1830	MRC-149 ✓	FLAM. SOLID	14	5	194572	19083
46	1830	MRC-150 ✓	FLAM. SOLID	11	5	194572	19083
47	1830	MRC-151 ✓	OXIDIZER (SOLID)	18	5	194572	19083
48	1830	MRC-152 ✓	NON-RCRA SOLID	65	15	194572	19083
49	1830	MRC-153 ✓	OXIDIZER	19	5	194572	19083
50	1830	MRC-155 ✓	FLAM. LIQ.	218	55	194572	19083
51	1830	MRC-156 ✓	FLAM. LIQ.	227	55	194572	19083
52	1830	MRC-157 ✓	NON REG. WASTE, LIQ.	218	55	194572	19083
53	1830	MRC-158 ✓	CORROSIVE LIQ.	14	5	194572	19083
54	1830	BNW-788 ✓	NON REG. WASTE, LIQ.	250	55	194572	19083
55	1830	BNW-789 ✓	NON REG. WASTE, LIQ.	170	55	194572	19083
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