

0003312 8903596B
cc EMB
WMD
AMO

CHRISTINE O GREGOIRE
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

August 28, 1989

RECEIVED
R.E. LERCH

AUG 31 1989

Mr. Roger Freeberg
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352

ACTION _____
COPIES _____
RCUTE _____
FILE _____

Dear Mr. Freeberg:

Re: Notice of Violation

This notice serves as an initial warning that the Hanford Reservation stands in violation of Washington State Dangerous Waste Regulations concerning security, general inspection and accumulation standards (WAC 173-303-200, -310 and -320).

These violations were noted during a July 20, 1989 inspection of the 216-A-29 Ditch, 216-B-Pond and the Central Waste Complex. Attachment 1 to this notice lists these violations and notes corrective actions, which if taken on your part, will suspend further action by our office in this regard.

Attachment 2 to this notice is a Certificate of Compliance. Please fill this form out and submit it to Ecology no later than October 15, 1989. Should you choose not to comply, further administrative and/or legal actions will be taken. A follow-up inspection will be conducted at the above units to verify compliance with this notice.

The July 20, 1989 inspection also verified USDOE compliance with our May 11, 1989 NOV. I appreciate your efforts in satisfactorily accomplishing each corrective action identified in that notice. Please note that corrective action item #1 from the May and June NOV's indicate that the compliance action schedules would be issued by our office in December 1989. The date which we approve, and subsequently issue, these schedules, is dependent on the date we receive them from your office and the complexity of any issues posed by your submittal. Therefore, the schedules may not be issued in December 1989. However, permanent security systems must still be addressed in the schedules.

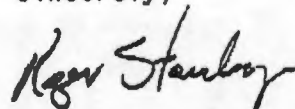
91118891533



Mr. Freeberg
August 28, 1989
Page 2

Regulatory or technical inquiries regarding this NOV may be directed to Mr. Toby Michelena at (206) 438-7016.

Sincerely,



Roger Stanley
Hanford Project Manager

Attachments

cc: Paul Day
Jack Waite

91118891534

ATTACHMENT 1

- 9 1 1 8 8 9 1 5 3 5
1. Violation: A security system as per WAC 173-303-310 does not exist at the 216-A-29 Ditch.

Corrective Action: Construct at least a continuous single-strand chain fence around the 216-A-29 Ditch before September 30, 1989. This fence should be appropriately marked with dangerous waste and radiation warning signs. This fence will serve as a temporary safety measure. The installation of a permanent security system must be addressed in the compliance action schedules (Milestone M-22-00) to be submitted to our office in December 1989.

2. Violation: Ten drums from the Plutonium Finishing Plant were noted at the Central Waste Complex. These drums contained dangerous waste and had "Accumulation Start Dates" of July 15, 1988. WHC employees indicated that these drums were received by the CWC within the last 24 hours. We assume these drums were stored at the PFP from July 15, 1988 until approximately July 19, 1989. This exceeds the 90-day accumulation period allowed by WAC 173-303-200.

Corrective Action: Verify the location of the ten drums during the period in question. Although these drums are now properly stored, there may be other less than 90-day accumulation areas which have violated WAC 173-303-200. In order to verify compliance with this regulation, USDOE must submit a list of all less than 90-day dangerous waste accumulation facilities and satellite storage areas by September 15, 1989. This list was originally requested by our office in a June 8, 1989 letter.

3. Violation: Four radiation warning signs were found unsecured on the ground near the 216-A-29 Ditch and 216-B-Pond facilities. This is a violation of the general inspection standards of WAC 173-303-320.

Corrective Action: Remove or re-post the four signs as well as any other such signs in this area before September 15, 1989. WAC 173-303-320 requires general inspections often enough to identify deterioration. It may be necessary to increase the frequency of inspections at these facilities to avoid similar violations in the future. Submit the current inspection schedule with the Certificate of Compliance by September 30, 1989.

Please complete and return this form to Roger Stanley, Washington Department of Ecology, Hanford Project, Mail Stop PV-11, Olympia, Washington 98504, by October 15, 1989

Certificate of Compliance

As a legal representative of U.S. Department of Energy, I certify that to the best of my knowledge, the compliance status at our hazardous waste facility located at _____, Facility I.D. No. WA7890008967 is as shown below.

<u>Items of Noncompliance</u>	<u>Category I, II, III</u>	<u>Compliance Date</u>	<u>Compliance Status (Check One)</u>		<u>Comments</u>
			<u>Complied</u>	<u>Not Complied</u>	
Install Security Fence	II	10-15-89			
Provide Storage List & Verify Drum Location	III	9-30-89			
Remove/Rc-post Signs	II	9-30-89			
Provide Inspection Schedule	III	9-30-89			

(Signature)

(Printed Name)

(Title)

(Date)

91118891536

DISTRIBUTION COVERSHEET

Author R. F. Stanley, Ecology	Addressee R. D. Freeberg, DOE-RL	Correspondence No. Incoming: 8903596B Action By: HEM By 10/15/89
Subject NOTICE OF VIOLATION (216-A-29 DITCH, 216-B-POND, AND CENTRAL WASTE COMPLEX)		

Internal Distribution

Approval	Date	Name	Location	w/att
		Correspondence Control		X
		R. J. Bliss	B3-04	X
		G. D. Carpenter	H4-15	X
		H. F. Daugherty	R2-53	X
		K. L. Hoewing	B3-06	X
		R. H. Koga	B3-07	X
		R. E. Lerch (Assignee)	H4-51	X
		H. E. McGuire	H4-51	X
		R. C. Nichols	B3-02	X
		J. E. Nolan	B3-01	X
		D. E. Simpson	B3-51	X
		S. A. Wiegman	H4-50	X
		EDMC	H4-51	X



91118891537