



0055203

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

July 9, 2001

Mr. Keith Klein
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Ms. Mary (Fran) Delozier
CH2M Hill Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-08
Richland, Washington 99352-1505

Mr. Michael Hughes
Bechtel Hanford, Inc.
3350 George Washington Way, MSIN: H0-04
Richland, Washington 99352

Mr. Keith Thompson
Fluor Hanford, Inc.
P.O. Box 1000, MSIN: H5-20
Richland, Washington 99352

Dr. Lura Powell
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: K1-46
Richland, Washington 99352

RECEIVED
JUL 18 2001
EDMC

Dear Mr. Klein, Ms. Delozier, Mr. Hughes, Mr. Thompson, and Dr. Powell:

Re: Inspection of Inactive Miscellaneous Underground Storage Tanks

Thank you for the assistance of the United States Department of Energy (USDOE), CH2M Hill Hanford Group (CHG), Bechtel Hanford, Inc. (BHI), Fluor Hanford, Inc. (FH), and Pacific Northwest National Laboratory (PNNL) personnel during the Washington State Department of Ecology's (Ecology) inspection of Inactive Miscellaneous Underground Storage Tanks (IMUSTs) that began in March 2001. The inspection was conducted to determine ownership, current status, and regulatory compliance of the sixty-six (66) identified IMUSTs located on the Hanford site. Compliance with Washington State Dangerous Waste Regulations, Washington Administrative Code (WAC) 173-303, and the Hanford Federal Facility Agreement and Consent Order (HFFCO) were evaluated.

Mr. Klein, Ms. Delozier, Mr. Hughes, Mr. Thompson, and Dr. Powell
July 9, 2001
Page 2

During the inspection, USDOE and contractor personnel provided information, accompanied Ecology inspectors on site visits, and participated in in-briefing and out-briefing meetings, as well as numerous other meetings, to aid in Ecology's information gathering.

No violations were discovered during the inspection. However, five (5) concerns were noted as described below:

1. WAC 173-303-803 – Permit Application Requirements

The Single Shell Tank (SST) System Part A permit application, Form 3, does not contain a scale drawing of the facility showing the location of all past, present, and future treatment, storage, and disposal areas as required by WAC 173-303-803 (3)(i).

The latest revision to the SST Part A permit application, Rev. 6, dated December 21, 1999, does not list IMUSTs associated with the SST System. These tanks were used to treat, store, or dispose of hazardous waste and have been identified as ancillary equipment to the SST System. Milestone M-45 of the HFFACO states that ancillary equipment to the SST System will be dispositioned with the operable unit in which that equipment resides. Twenty-five (25) IMUSTs are located in the six (6) operable units that comprise the SST System. Since the tanks were used to manage hazardous waste in the past, they must be listed in the SST System Part A permit application as required by WAC 173-303-803 (3)(i).

2. HFFACO Section 3.5 – Waste Information Data System (WIDS) Requirements

Section 3.5 of the HFFACO identifies the WIDS as, "the electronic database of waste site information for the Hanford site. The WIDS identifies all waste management units on the Hanford Site, and describes the current status of each unit."

The WIDS was found to contain numerous errors, omissions, and inconsistencies related to the IMUSTs. Section 3.5 of the HFFACO requires the system to show "all" waste site information and to describe the "current status" of each unit on the Hanford site. In many cases, the information in HFFACO Appendices B and C are not consistent with the information found in the WIDS. This information must be accurate because it will be used in determining the disposition of the waste management sites that make up the operable units.

3. CX Tank System Close-Out Form Requirements

The CX Tank System is not being inspected monthly as required by its Silver Close-Out form.

Documentation indicates that the required monthly inspections for the three (3) tanks in the CX Tank System were missed five (5) times in 2000. A monthly inspection of the CX Tanks is required by Close-Out Form 16.6.1, dated April 29, 1996. This form exempted the CX Tank System from the requirement to apply for a Part A Permit, even though the tanks had managed dangerous waste after the effective date of RCRA at the Hanford site.

Mr. Klein, Ms. Delozier, Mr. Hughes, Mr. Thompson, and Dr. Powell
July 9, 2001
Page 3

4. CHG Tank Waste Summary Report Inaccuracies

The CHG Waste Tank Summary Report, HNF-EP-0182, does not accurately identify IMUSTs in the 200East and 200West Areas.

This report, known as the "Hanlon report" does not list several CHG owned IMUSTs, lists several tanks that are not CHG owned IMUSTs, and mis-identifies some IMUSTs.

5. Disputed Ownership of Tank 209-E-TK-111

Ownership of Tank 209-E-TK-111 has not been resolved between CHG and FH.

CHG claims that ownership of this tank was transferred to FH with the 209-E Facility. FH claims that ownership of the tank did not transfer with the facility and that CHG still owns the tank.

Ecology would like to see these concerns resolved as soon as possible. Failure to address these concerns with regulatory drivers could result in their being elevated to violations during future inspections.

This letter serves to close this inspection. Any questions concerning this letter should be directed to Sterling L. (Bud) Derrick at (509) 736-5703.

Sincerely,



Sterling L. (Bud) Derrick, Compliance Inspector
Nuclear Waste Program

SLD:nc

cc: Doug Sherwood, EPA
Cliff Clark, DOE-RL
Ellen Matlin, DOE-RL
Tony McKarns, DOE-RL
Roger Bowman, FH
Steve Szendre, FH
Ray Collins, BHI
Phil Miller, CHG
Gene Grohs, PNNL
Mary Lou Blazek, OOE
Administrative Record