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STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

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

December 13, 1993

Mr. John Wagoner, Manager  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Mr. Tom Anderson, President  
Westinghouse Hanford Company  
P.O. Box 1970  
Richland, WA 99352



Dear Messrs. Wagoner and Anderson:

Re: Violations at 224-T Transuranic Waste Storage and Assay Facility

Thank you for the assistance of United States Department of Energy (USDOE) and Westinghouse Hanford Company (WHC) personnel during the Washington State Department of Ecology's (Ecology) November 18 and 22, 1993, inspections at the Transuranic Waste Storage and Assay Facility (TRUSAF). The inspection was conducted to determine compliance with interim status requirements under Chapter 173-303 Washington Administration Code (WAC) for hazardous and/or mixed waste, and to status current activities with respect to the Dangerous Waste Part B Permit Application.

A problem discovered during the inspection at TRUSAF is with management of waste once the real-time radiography (RTR) process detects a suspect or confirmed dangerous waste within a container. For example, lead lined gloves have been found in many containers. Some containers were designated as radioactive mixed waste based on the lead (D008), others were not. All solid waste must go through the designation process (WAC 173-303-070). There are no provisions in the Dangerous Waste Regulations for classifying a waste as "suspect." Waste is either solid waste or dangerous waste. Many containers at TRUSAF have been in a "suspect" status for many years with no progress made towards determining its dangerous waste status.

TRUSAF is unique as a treatment, storage, and disposal facility in that many of the containers received are not designated as dangerous waste. However, once USDOE/WHC determines that a dangerous waste component exists, steps must be taken to verify the new knowledge by having the waste properly designated. In the case of TRUSAF, containers have been identified as containing materials that designate as dangerous waste. Such containers must be managed as dangerous waste once such

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knowledge is gained. Although the problem at TRUSAF may stem from inaccurate or incomplete designation on the part of the generator, this particular inspection focused specifically on TRUSAF as a waste storage facility.

The following is a summary of violations and additional concerns resulting from Ecology's TRUSAF inspection.

### SUMMARY OF VIOLATIONS

As discussed after the inspection, there were several areas of noncompliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC) which need to be resolved.

**WAC 173-303-400 Interim status facility standards.** (3)(a) Interim status standards shall be standards set forth by the Environmental Protection Agency in 40 CFR 265 Subparts F through R . . . and: (i) . . . the facility requirements of WAC 173-303-280 through 173-303-440; (ii) WAC 173-303-630(3) for containers. In addition, for container storage, the department may require that the storage area include secondary containment in accordance with WAC 173-303-630(7) . . . . Any new container storage areas constructed or installed after September 30, 1986, must comply with the provisions of WAC 173-303-630(7).

- 1) **WAC 173-303-350 Contingency plan and emergency procedures.**  
Failure to maintain emergency equipment required under WAC 173-303-350(3)(e) in accordance with the facility contingency/emergency plan

*Emergency equipment was not maintained at TRUSAF in accordance with the facility emergency/contingency plan, document #WHC-IP-0263-224T, Section 5.2. The following emergency items identified as required by the plan were not found within the TRUSAF facility during the November 22, 1993, inspection: Hand-operated rotary pump, face shields, rubber coveralls, non-sparking shovels, radiation rope, respirators, and contaminated surface signs. TRUSAF representatives have made efforts to acquire missing equipment and are reviewing the need for revising the plan.*

- 2) **WAC 173-303-380 Facility recordkeeping.**  
Failure to maintain operating records in a manner sufficient to locate wastes within the facility per WAC 173-303-380(1)(b)

*Container records are filed based on date received, not Package Identification Number. In order to locate a specific container file, one must first locate the drum within the facility, review the attached paperwork for date received, then backtrack to the container file. In other words, one has no means of locating a specific container*

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*file within TRUSAF unless the date received is first known. Once drums are received at TRUSAF, there is no system in place to report the location of each dangerous waste within the facility. Ecology selected three containers at random for container record review. One of the three records selected could not be found in the record file: Drum #RHZ-213-A21768, a mixed waste drum located on the third floor.*

- 3) **WAC 173-303-630 Use and management of containers.**  
 Failure to label containers with hazardous waste labels and/or in a manner which adequately identifies the major risk(s) associated with the contents of the containers per WAC 173-303-630(3)

Failure to store containers within a compliant secondary containment system per WAC 173-303-630(7)

*Wastes originally shipped to TRUSAF as strictly radioactive, then, through the RTR process, discovered to contain a suspect and/or confirmed dangerous waste component (e.g., lead lined gloves, paint, free liquids, etc.) were not managed as radioactive mixed waste (e.g., hazardous waste labels were not applied, major risks were not identified, secondary containment was not provided, etc.). (Drum #RHZ-212-A19448 and enclosure 1)*

*Many dangerous waste containers containing free liquids were not stored within a compliant secondary containment system. (Drums #BL-0919-00-MAP, #BL-0852-00-MAP, #RHZ-213-A21723, #HRO-92-0000204, and enclosure 1) TRUSAF representatives informed me that they intend on completing efforts aimed at satisfying secondary containment requirements within two months by application of a floor sealant.*

### SUMMARY OF CONCERNS

- 1) Secondary containment was not provided for three incoming containers (Drums #RHZ-212-A22794, #RHZ-212-A22795, and #RHZ-212-A22796) prior to confirming the absence of free liquids, per section 4.1.1.3. of the Part B permit application.
- 2) The building/emergency plan (WHC-IP-0263-224T) does not address procedures for responding to spills and/or retrieving spilled material within the TRUSAF elevator area. Also, Section 5.4.2 of the building emergency/contingency plan states the emergency equipment provided is to be used for *nonradioactive* hazardous material spills. The waste at TRUSAF is exclusively radioactive and radioactive mixed.

- 3) Similar violations to those Ecology cited have been noted on internal WHC audit reports. (Reference: Audit #93RCW-162, performed October 27, 1993; Audit #IAA-93-0009, performed September 1, 1993, WHC Environmental Compliance Assurance; Assessment #SWA-93-0015, performed March 23-35, 1993)
- 4) Some of the containers on the third floor, stacked two high, had no visible documentation attached. The TRUSAF operator stated that the top drums had been stacked on top of the paperwork for the bottom drums, making the documentation inaccessible.
- 5) Drums located in the north end of the first floor were being stored in blocks of five to six drums wide and deep. The TRUSAF operator stated that there are containers in the area that contain lead and/or free liquids. No violations were noted in this area; however, Ecology inspectors were unable to inspect the containers and attached documentation due to inaccessibility.

In order to correct the identified violations of Chapter 173-303 WAC, please complete the following corrective actions within the timeframes specified. Please be advised that failure to correct these noncompliant items may result in the issuance of an administrative order and/or penalty under RCW 70.105.080 and/or .095 (Hazardous Waste Management).

This voluntary compliance letter is being issued pursuant to the authorities granted to Ecology by RCW 70.105 (Hazardous Waste Management).

**CORRECTIVE ACTION #1**

Within thirty (30) days of receipt of this letter, USDOE and WHC must acquire and maintain the emergency equipment required by WAC 173-303-350(3)(e) in accordance with the TRUSAF facility emergency/contingency plan (WHC-IP-0263-224T).

**CORRECTIVE ACTION #2**

Within thirty (30) days of receipt of this letter, USDOE and WHC must begin maintaining the operating record in a manner sufficient to locate wastes within the facility per WAC 173-303-380(1)(b). For example, the Solid Waste Information Tracking System (SWITS) could be used to document the location of each dangerous waste within the facility and the quantity at each location.

**CORRECTIVE ACTION #3**

Within ninety (90) days of receipt of this letter, USDOE and WHC shall determine the dangerous waste status of all containers stored at TRUSAF. For all properly designated waste, no action is required. For improperly or incompletely designated waste, accurate designation must be performed. USDOE and WHC shall label all dangerous waste and

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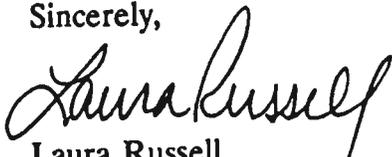
radioactive mixed waste with dangerous waste labels and in a manner which adequately identifies the major risk(s) associated with the contents of the containers per WAC 173-303-630(3).

**CORRECTIVE ACTION #4**

Within ninety (90) days of receipt of this letter, USDOE and WHC shall store all dangerous waste containers containing free liquids within a compliant secondary containment system per WAC 173-303-630(7).

Please do not hesitate to call me at (509) 736-3024 or Alisa Huckaby, TRUSAF Unit Manager, at (509) 736-3034 should you have any questions or require clarification on any of the items in this compliance letter or the enclosed "Certificate of Compliance." Please complete and submit the enclosed "Certification of Compliance" to this Department by March 18, 1994 (enclosure 2).

Sincerely,



Laura Russell  
RCRA Compliance Inspector  
Nuclear and Mixed Waste Management Program

LER:sr  
Enclosures (2)

cc: Keith Kline, USDOE  
Mike Aichele, WHC  
Paul Hapke, WHC  
Matt LaBarge, WHC  
Jeff Pratt, WHC  
Roger Szelmeczka, WHC  
Dan Duncan, EPA  
Administrative Record

Please complete and return this form to Laura Russell, Washington State Department of Ecology, 7601 West Clearwater #102, Kennewick, Washington 99336, by March 18, 1994.

### CERTIFICATE OF COMPLIANCE

As a legal representative of the U.S. Department of Energy, I certify to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on December 13, 1993, with regard to the inspection of the 244-T Transuranic Waste Storage and Assay Facility (TRUSAF), located on the Hanford Reservation, 200 West Area, Facility ID Number WA7890008967 as shown below.

### COMPLIANCE STATUS

(A facility representative shall list the completion date and initial for each item.)

CORRECTIVE ACTION	DATE DUE	DATE COMPLETED	INITIALS	COMMENTS
#1	1/13/94			
#2	1/13/94			
#3	3/14/94			
#4	3/14/94			

Signature of DOE-RL Representative

Date

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**TRUSAF FACILITY INSPECTION**  
**SUMMARY OF CONTAINER VIOLATIONS FOUND ON THE THIRD FLOOR**  
**ENCLOSURE 1**

**THIRD FLOOR:**

DRUM NUMBER	LOCATION/SIGN	COMMENTS/VIOLATIONS
BP-189007	PNL-ALMOST CERT. HOLD/RETURN - OMW	HW Label: D008, WT01 Markings: OMW, MW-EHW No major risks on drum
BP-89011	"	HW Label: D006, D008, D009, WT01, WC02 Markings: OMW, TRU Waste No major risks on drum
PNL-188013	"	HW Label: WC01, D006, WT02 Markings: TRU No major risks on drum
PNL-188005	"	HW Label: D008, WT01 Markings: TRU No major risks on drum
RHZ-103-A15486	SUSPECT NON-MIXED RETURN TO GENERATOR	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A15110	"	Lead gloves and free liquids identified on paperwork No HW label on drum No major risks on drum No secondary containment
RHZ-102-A14967	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A15270	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum

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RHZ-102-A15389	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-241-A19347	"	Mercury thermometer identified on paperwork No HW label on drum No major risks on drum
RHZ-103-A15028	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-213-A17573	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-103-A14985	"	Lead gloves and free liquids identified on paperwork No HW label on drum No major risks on drum No secondary containment
RHZ-102-A15488	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A14836	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-102-A15266	"	Lead gloves and free liquids identified on paperwork No HW label on drum No major risks on drum No secondary containment
RHX-103-A14857	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum

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RHZ-111-A15633	"	Lead gloves identified on paperwork No HW label on drum No major risks on drum
RHZ-212-A18517	RETURN TO GENERATOR OMW (Note: The 8 containers located under this sign in the morning were placed on portable secondary containment systems during our lunch break)	HW Label: WT01, WP01, WC01 Markings: Liquid Organic Waste, RMW-EHW, OMW No major risks on drum No secondary containment
RH-A-87-067	"	Paint identified on paperwork Markings: "Need label" No HW label on drum No major risks on drum
RHZ-212-A18446	"	Free liquids identified on paperwork HW Label: WC01, WP-1, WT01 Markings: EHW No major risks on drum No secondary containment
RHZ-212-A19731	"	Free liquids identified on paperwork HW Label: WT01, WC01, WP01 Markings: Liquid Organic Waste, RMW-EHW, FP > 200F, OMW No major risks on drum No secondary containment
RH-A-85-071 (TRU only)	"	Free liquids identified on paperwork No secondary containment

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RHZ-212-A18496	"	Free liquids identified on paperwork HW Label: WT01, WC01, WP01 Markings: Liquid Organic Waste, RMW-EHW, FP > 200F, OMW No major risks on drum No secondary containment
RHZ-212-A18497	"	Free liquids identified on paperwork HW Label: WT01, WC01, WP01 Markings: Liquid Organic Waste, RMW-EHW, FP > 200F No major risks on drum No secondary containment
RHZ-213-A21768	"	Free liquids identified on paperwork HW Label: WC02, D007, WT01, D008, D002, D009, EHW Markings: RMW-EHW, TCLP Toxic No secondary containment
RH-A-87-060	HOLD-CANNOT PENETRATE-OMW	Free liquids identified on paperwork HW Label: D008 No major risks on drum No secondary containment
RHZ-212-A19715	"	Lead gloves, D008, WT01 identified on paperwork HW Label: incomplete No major risks on drum
RH-A-87-027	"	HW Label: D008 Markings: MW-DW, OMW No major risks on drum
RH-A-88-009	"	HW Label: D008 Markings: MW-DW, OMW No major risks on drum

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RHZ-212-19446	"	HW Label: D008, WTO1, EHW Markings: RMW-EHW, OMW No major risks on drum
RH-A-90-022	"	HW Label: D008 Markings: RMW-DW, OMW No major risks on drum
RH-A-90-002	"	HW Label: D008 Markings: RMW-DW, OMW No major risks on drum
RH-A-91-001	"	HW Label: D008 Markings RMW-DW, ORM-E No major risks on drum
RHZ-212-A19931	"	HW Label: D008, WT01 Markings: RMW-EHW, OMW No major risks on drum
RH-A-88-006	"	HW Label: D008 Markings: "Corrosive label?" MW-DW No major risks on drum
RHZ-212-A19135	"	HW Label: D008, WT01 Markings: RMW-EHW, OMW No major risks on drum
RH-A-88-023	"	HW Label: D008 Markings: OMW No major risks on drum
RHZ-213-A19574	"	HW Label: D008, WTO1, EHW Markings: RMW-EHW, OMW No major risks on drum
RH-A-87-026	"	HW Label: D008 Markings: MW-DW, OMW No major risks on drum
RHZ-212-A19296	"	HW Label: D008, WT01, EHW Markings: RMW-EHW, OMW No major risks on drum

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RHZ-212-A17094	SUSPECT NON-MIXED RETURN TO GENERATOR	Free liquids identified on paperwork No secondary containment No major risks
RHZ-212-A17986	"	Free liquids identified on paperwork No secondary containment No major risks
RHZ-212-A17453	"	Free liquids identified on paperwork No secondary containment No major risks
RHZ-212-A17257	"	Lead identified on paperwork No major risks
RHZ-212A-17275	"	Lead identified on paperwork No major risks
RHZ-220-A16369	"	Lead identified on paperwork No major risks
RHZ-213-A17407	"	Lead identified on paperwork No major risks
RHZ-212-A17393	"	Lead identified on paperwork No major risks
RHZ-212-A17049	"	Lead identified on paperwork No major risks
RHZ-212-A17087	"	Lead identified on paperwork No major risks
RHZ-213-A17470	"	Lead identified on paperwork No major risks
RHZ-213-A17486	"	Lead identified on paperwork No major risks
RHZ-213-A21917	"	Lead identified on paperwork No major risks
RHZ-102-A14837	"	Lead identified on paperwork No major risks

RHZ-212-A20498	"	Lead identified on paperwork No major risks
RHZ-103-A15485	"	Lead identified on paperwork No major risks
RHZ-102-A14799	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-103-A14541	"	Lead identified on paperwork No major risks
RHZ-102-A14800	"	Lead identified on paperwork No major risks
RHZ-105-A14862	"	Lead identified on paperwork No major risks
RHZ-103-A14318	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-102-A14053	"	Lead identified on paperwork No major risks
RHZ-102-A14968	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-103-A15015	"	Lead identified on paperwork No major risks
RHZ-103-A15025	"	Lead identified on paperwork No major risks
RHZ-103-A15013	"	Lead identified on paperwork No major risks
RHZ-213-A17471	"	Lead identified on paperwork No major risks

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RHZ-103-A15278	"	Free liquid and lead identified on paperwork No major risks No secondary containment
RHZ-213-A17568	"	Lead identified on paperwork No major risks
RHZ-212-A19567	HOLD-CANNOT PENETRATE	Lead identified on paperwork No major risks
RHZ-212-A19845	"	Lead identified on paperwork No major risks
RHZ-212-A21030	"	Lead identified on paperwork No major risks
RHZ-212-A20576	"	Lead identified on paperwork No major risks
RHA-88021	"	Lead identified on paperwork No major risks
RHA-88004	"	Lead identified on paperwork No major risks
RHZ-220-A20834	"	Lead identified on paperwork No major risks
RHA-89004	"	Lead identified on paperwork No major risks
RHZ-212-A20499	"	Documentation not visible
RHZ-212-A19843	"	Documentation not visible
RHZ-212-A21410	"	Documentation not visible
RHZ-212-A18445	"	Documentation not visible
RH-A89007	CAUSTIC-RETURN TO GENERATOR	Free liquid identified on paperwork No major risks No secondary containment

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RH-A87032	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87047	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87050	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87051	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A88022	"	Free liquid identified on paperwork No major risks No secondary containment
RH-A87062	"	Free liquid identified on paperwork No major risks No secondary containment

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
L. Russell, Ecology	J. Wagoner, RL T. Anderson, WHC	Incoming 9401520

Subject: VIOLATIONS AT 224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY

## INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
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		M. D. Aichele	T4-04	X
		B. A. Austin	B2-35	
		R. C. Bowman	H6-24	X
		B. J. Broomfield	T3-04	X
		G. D. Carpenter	H6-30	
		D. J. Carrell	H6-22	X
		L. P. Diediker	T1-30	X
		B. G. Erlandson	H6-21	X
		W. H. Hamilton, Jr.	N3-10	X
		G. W. Jackson, Assignee	H6-21	
		R. E. Lerch	B3-63	
		M. M. McCarthy	N3-13	X
		P. J. Mackey	B3-06	X
		K. M. McDonald	T4-03	X
		H. E. McGuire, Level I	B3-63	X
		R. D. Pierce	T3-04	X
		D. B. Powell	T4-03	X
		S. M. Price	H6-23	X
		R. J. Roberts	N3-13	X
		D. G. Saueressig	H6-24	X
		N. M. Shoemaker	T4-04	X
		R. W. Szelmezcza	T4-06	X
		J. F. Williams Jr.	H6-24	X
		RCRA File/GHL	H6-23	X
		EPIC	H6-08	X

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