



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

August 9, 2004

Mr. Paul W. Kruger  
Laboratory Management Division  
United States Department of Energy  
P. O. Box 550, MSIN: K8-50  
Richland, Washington 99352

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EDMC

Mr. Leonard K. Peters  
Life Sciences Center  
Pacific Northwest National Laboratories  
P.O. Box 999, MSIN: K1-46  
Richland, Washington 99352

Dear Messrs. Kruger and Peters:

Re: Dangerous Waste Compliance Inspection at 331 and 325 building on July 20, 2004

Thank you for the assistance of the United States Department of Energy (USDOE) and Pacific Northwest National Laboratories (PNNL) personnel during the Washington State Department of Ecology's (Ecology) recent inspection of the 331 and 325 buildings.

During the course of this inspection, hazardous waste was observed in a satellite accumulation area (SAA) in the north hood of room 525 in the 325 building. Hazardous waste was also observed in an SAA within a small storage room adjacent to the north hood.

It was explained that hazardous waste containing radionuclides is generated within the hood and is accumulated in the SAA, also within the hood. After a container of the waste is ready for disposal, it is then moved from the SAA in the hood to the SAA in the storage room next to the hood. Ecology was told that this is where the waste is staged so that it can be radiologically characterized and then subsequently sent to the 325 hazardous waste treatment unit.

Ecology acknowledges that the physical movement of the hazardous waste from the hood to the storage room may be the safest way to deal with the waste in this specific situation considering the radiological exposure concerns. However, hazardous waste regulations do not allow movement of waste from one SAA to another SAA. Once a waste leaves a satellite accumulation

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area, it must be transferred to a permitted storage area or a 90-day accumulation area compliant with the requirements of Washington Administrative Code 173-303-200.


Please be aware that the transference of waste from one SAA to another SAA is a noncompliant activity, and that Ecology may assess violations if this is observed during future inspections of PNNL facilities. However, since Ecology does not believe that an imminent threat to human health or the environment presently exists from the waste movements within room 525 in the 325 Building, Ecology will employ its enforcement discretion to not cite a violation in this case.

Ecology suggests four options for achieving compliance in this case.

1. The room near the north hood in room 525 could be designated as a 90-day hazardous waste accumulation area and managed as such.
2. Hazardous waste generated from the processes within the hood could remain in the SAA within the hood.
3. The storage room next to the north hood in room 525 could be the designated SAA for the hood so long as wastes accumulated within the hood are placed into the SAA at the end of each operating shift.
4. Wastes accumulated in the SAA within the north hood in room 525 may be removed for short periods of time (i.e. during a work shift) in order to perform radionuclide characterization and then returned to the SAA.

Ecology will reassess waste accumulation within the 325 Building during a later inspection. Do not hesitate to contact me at (509) 372-7929, if you have any questions regarding this letter.

Sincerely,



Eric Van Mason  
Environmental Specialist  
Nuclear Waste Program

EVM:nc

cc: See next page

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cc: Jeff Carlson, PNSO  
Alice Ikenberry, PNNL  
Gene Grohs, PNNL  
Todd Martin, HAB  
Stuart Harris, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
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**Administrative Record**  
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