



U.S. Department of Energy
Office of River Protection

0076859

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

APR 11 2008

08-ESQ-069

Mr. John C. Fulton, President
and Chief Executive Officer
CH2M HILL Hanford Group, Inc.
2440 Stevens Center Place
Richland, Washington 99354

Dear Mr. Fulton:

CONTRACT NO. DE-AC27-99RL14047 – SUBMITTAL OF THE U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SURVEILLANCE S-08-ESQ-TANKFARM-009 FOR THE SINGLE-SHELL TANK (SST) SYSTEM DANGEROUS WASTE MANAGEMENT PROGRAM

This letter transmits the surveillance for SST System Dangerous Waste Management Program. The purpose of the surveillance was to determine if field conditions met the Dangerous Waste Regulations. There were no findings or observations.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Office of Environmental Safety and Quality, (509) 376-7828.

Sincerely,

William J. Taylor, Assistant Manager
Office of Environmental Safety and Quality

ESQ:GMN

Attachment

cc w/attach:
S. L. Dahl, Ecology
Administrative Record 5-2-4
Environmental Portal, LMSI

RECEIVED
APR 11 2008
EDMC

SINGLE-SHELL TANK SYSTEM SURVEILLANCE REPORT



MARCH 2008

Office of Environmental Safety and Quality

U.S. Department of Energy
Office of River Protection
P.O. Box 450, H6-60
Richland, Washington 99352

Single-Shell Tank System Surveillance

Table of Contents

Title of Surveillance	3
Dates Surveillance Conducted	3
Surveillance Team	3
Summary of Surveillance Activities	3
Documentation Reviewed for Surveillance	3
Findings and Observations	3
ORP Management Debriefed	3
Surveillance Conformance Summary	3
Appendix A - Surveillance Photos	6
Signature	19

Single-Shell Tank System Surveillance

Title of Surveillance:

Dangerous Waste Management Program

Dates Surveillance Conducted:

March 28, 2008.

Surveillance Team:

Field Surveillance: Gae Neath (Lead), Environmental Compliance Division (ECD); and Don Sommer, Support Services.

Summary of Surveillance Activities:

This surveillance evaluated field conditions to determine if the dangerous waste management practices supporting the Single-Shell Tank system met Dangerous Waste Regulations. The facilities were accessible during the surveillance. The evaluators found field conditions to be in compliance with regulations.

Documentation Reviewed for Surveillance

- TO-100-045, Inspect Waste Pad Areas and Active Containers.

Findings and Observations:

No findings or observations were identified.

ORP Management Debriefed:

The Division Director of ECD was briefed after the surveillance.

Surveillance Conformance Summary:

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
	WAC 173-303-200	Posted sign "danger-unauthorized personnel keep out" legible from 25'.	All hazardous waste storage areas were clearly posted with "Danger Hazardous Waste" signs. See Figures 1, 2, 4, 8, 10 and 12.
		All waste is placed in a permitted onsite facility in ninety days or less.	Hazardous waste containers inspected at the 616 Building, RMA-230, RMA-187, RMA-050, RMA-447, and RMA-256 were < 90 days

Single-Shell Tank System Surveillance

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
Dangerous Waste Management Facilities			old. See Figures 7, 9, and 13.
		The date upon which each period of accumulation begins is marked and clearly visible for inspection on each container.	All waste containers were labeled clearly with accumulation date documented. See Figures 7, 9, and 13.
		Each container is labeled or marked clearly with the words "dangerous waste" or "hazardous waste." Each container must also be marked with a label or sign which identifies the major risk(s) associated with the waste in the container.	All inspected waste containers were appropriately labeled (e.g. 'Toxic', 'Oxidizer', 'Persistent', and 'Corrosive'). See Figures 3, 5, 7, 9, 11, and 13.
		When 55 gallons of dangerous waste is accumulated, the container(s) must be marked immediately with the accumulation date and moved within three days to a designated storage or accumulation area.	All waste containers were appropriately marked with their accumulation date. See Figures 7, 9, and 13.
		Satellite accumulation area is secure.	RMA-050 and RMA-256 were locked. See Figures 8 and 12.
		WAC 173-303-340	All facilities must be equipped with fire extinguishers, spill control equipment, and decontamination equipment.
40 CFR Part 262	Containers are closed.	All inspected containers were secure. See Figures 3, 7, 9, and 13.	
	Site personnel perform weekly inspections.	The 'Active Container Inspection Sheet' is completed weekly and is signed by the 'Inspector', 'First Line Manager', and 'Waste Services	

Single-Shell Tank System Surveillance

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
		Site has secondary containment around the hazardous waste storage area.	Oversight? All waste storage areas contained secondary containment.

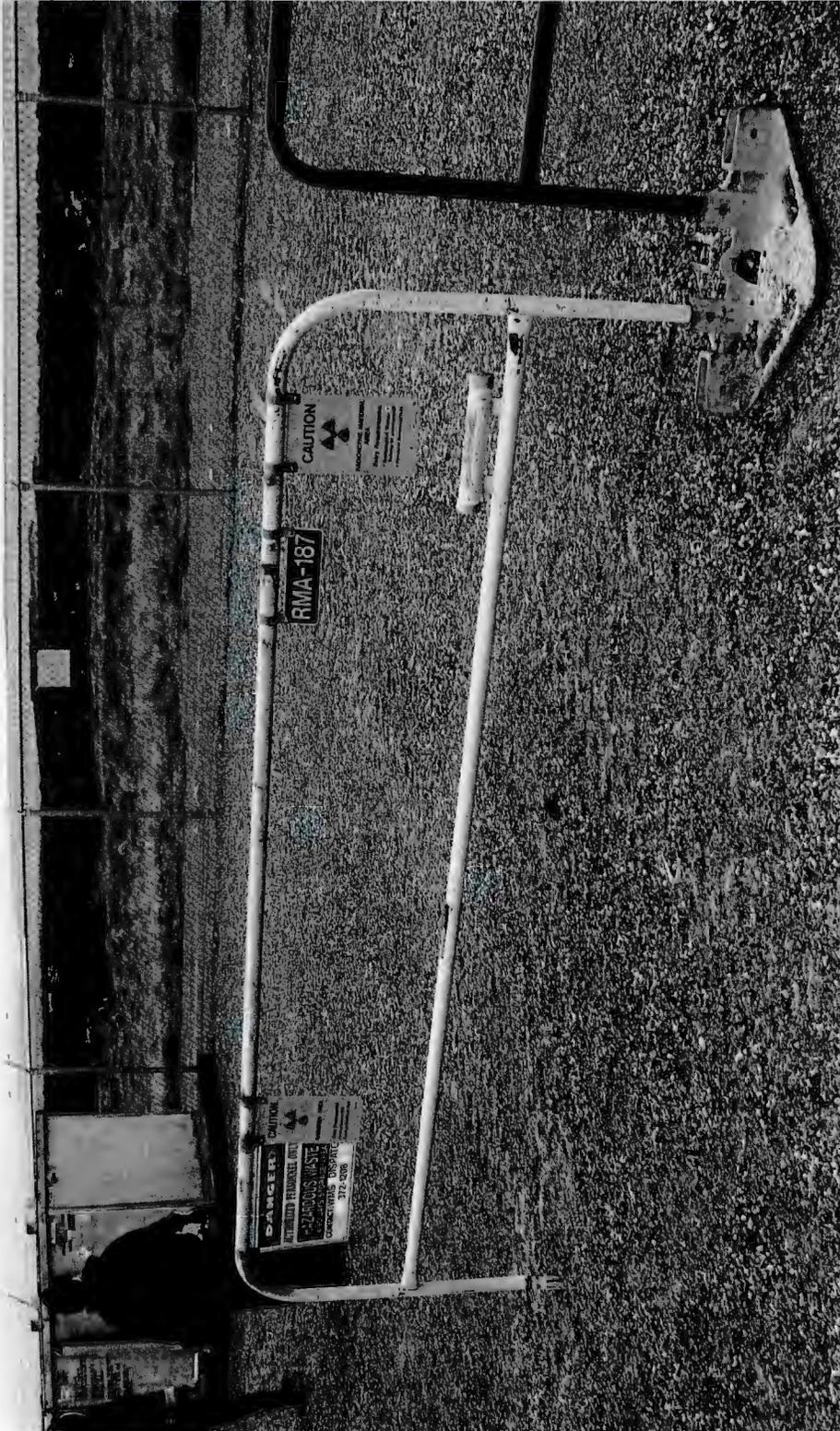
Appendix A - Surveillance Photos

Figure 1
616 Building – RMA 230



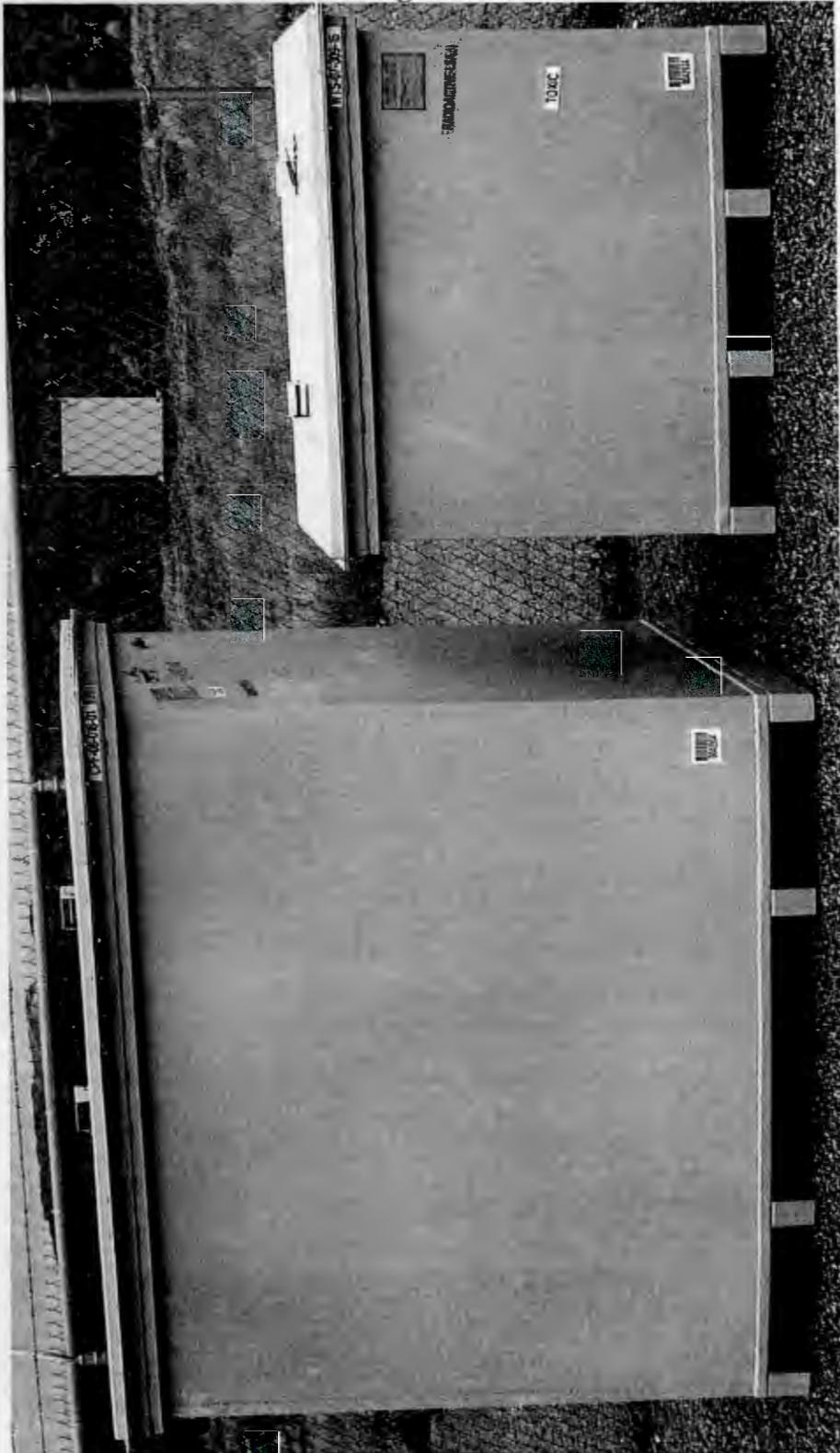
Appendix A (continued)

Figure 2
Outside 616 Building – RMA 187



Appendix A (continued)

Figure 3
RMA 187 - Outside 616 Building



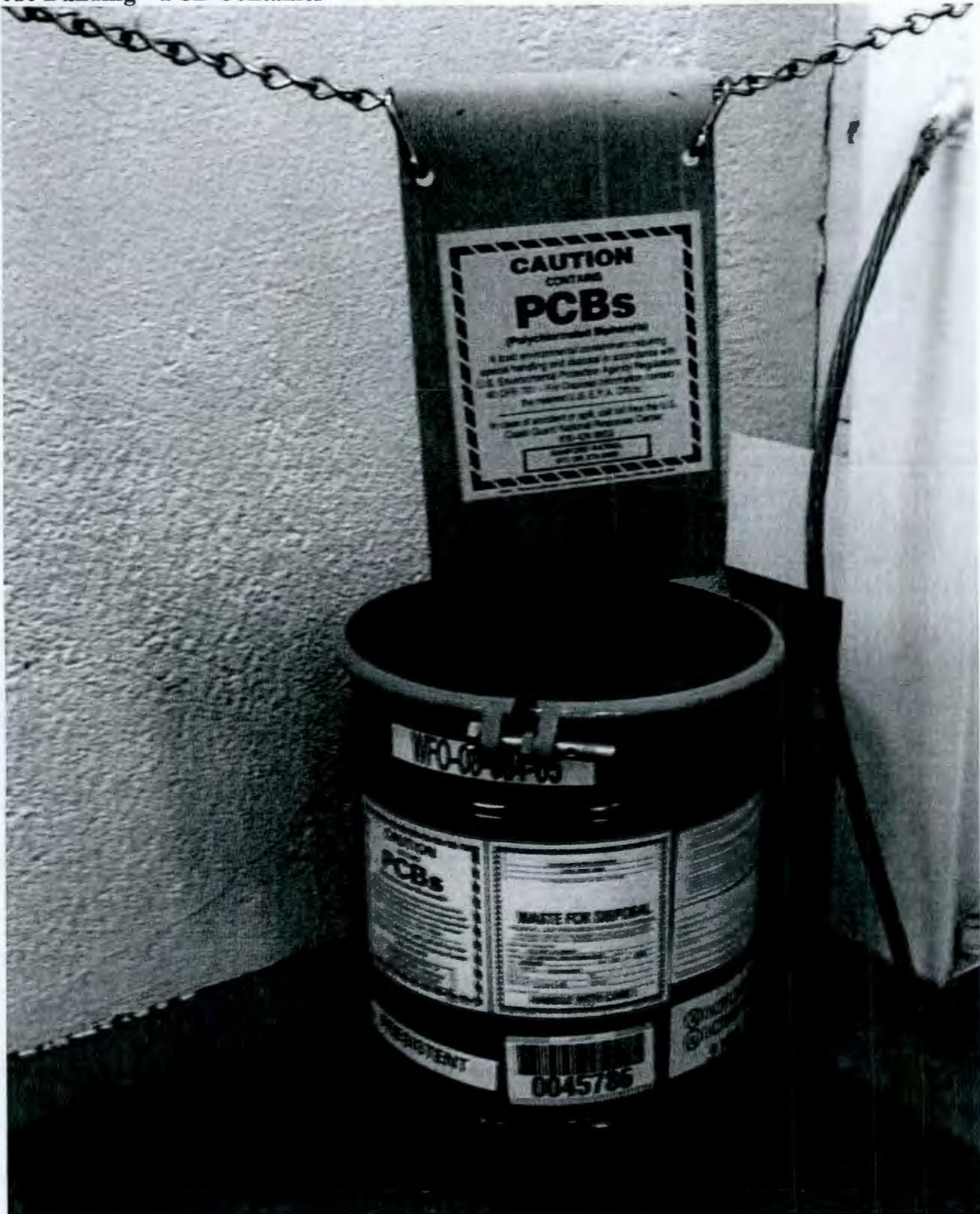
Appendix A (continued)

Figure 4
616 Building – Outdoor Hazardous Waste Accumulation



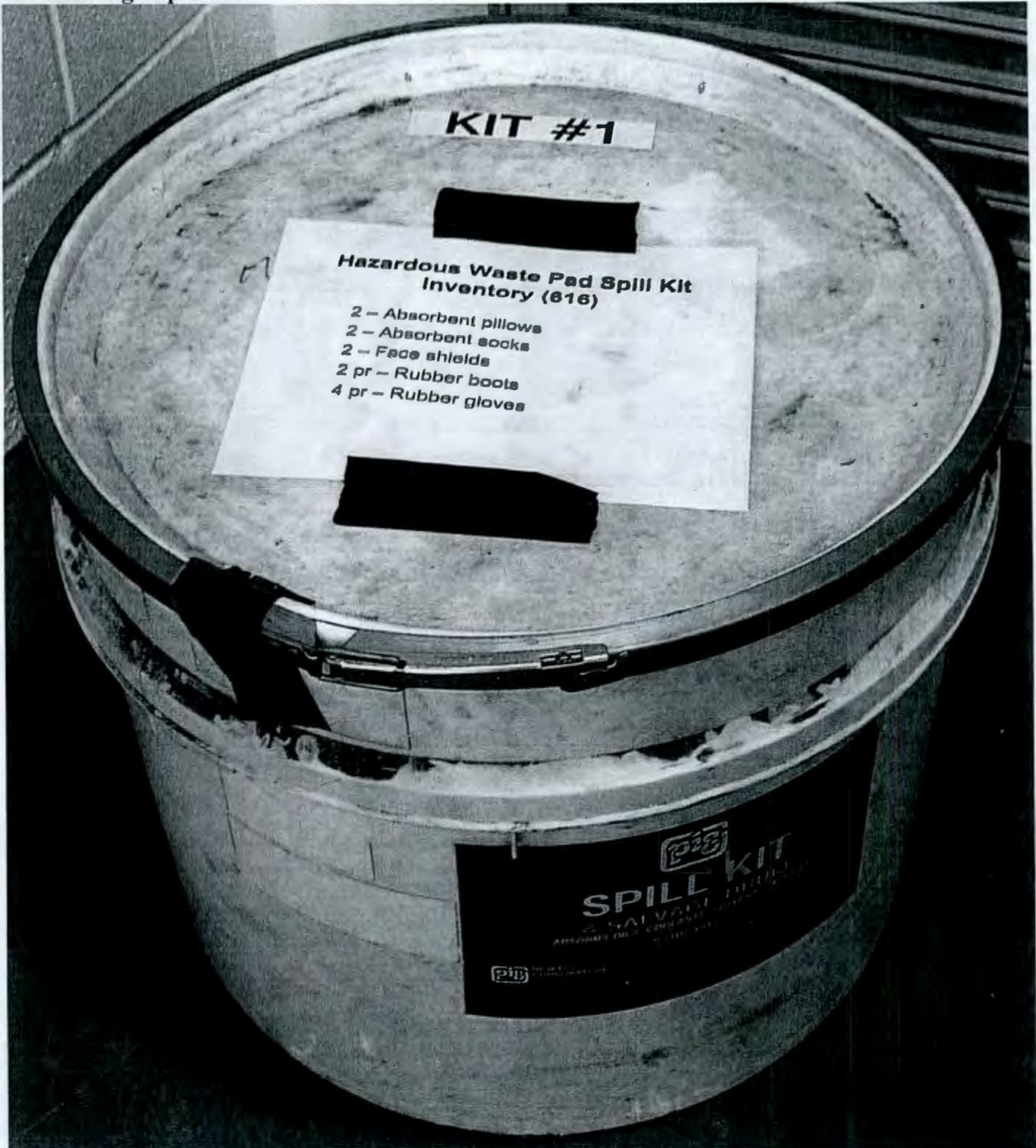
Appendix A (continued)

Figure 5
616 Building – PCB Container



Appendix A (continued)

Figure 6
616 Building - Spill Kit



Appendix A (continued)

Figure 7
C Farm Waste Containers



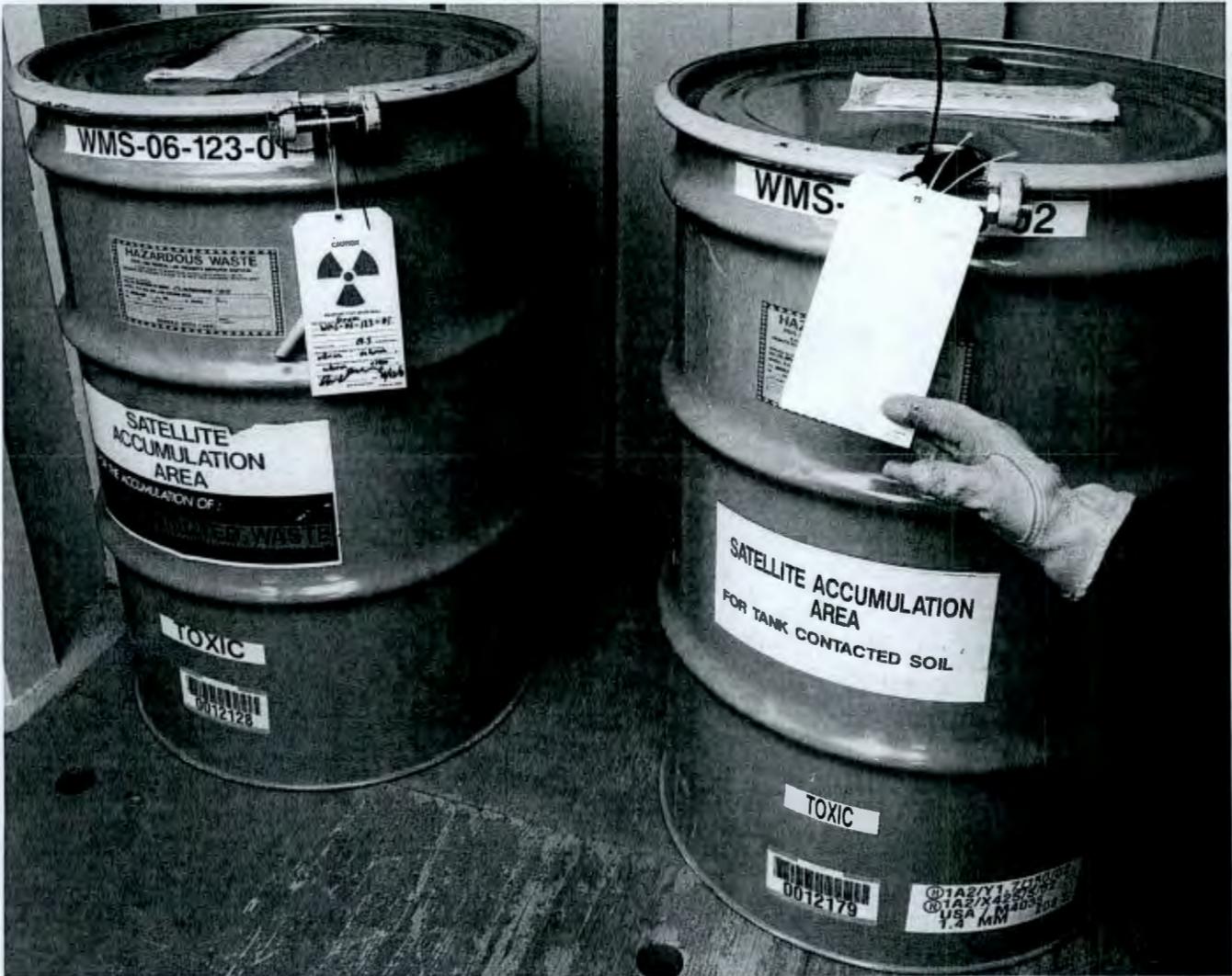
Appendix A (continued)

Figure 8
RMA-050 – Outside C Farm



Appendix A (continued)

Figure 9
RMA-050 Waste Containers



Appendix A (continued)

Figure 10
RMA-447 – Outside S Farm



Appendix A (continued)

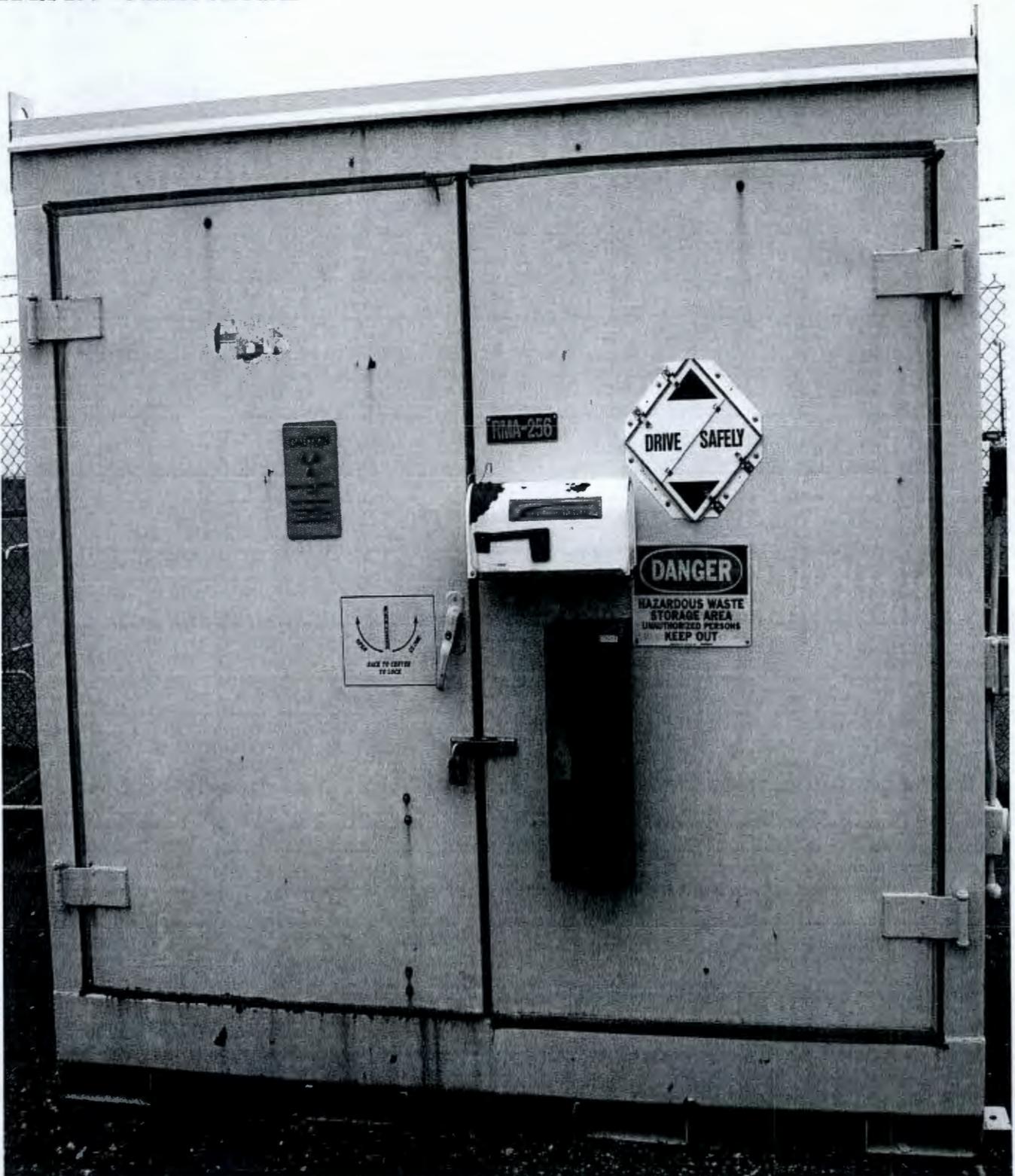
Figure 11
RMA-447 – Outside S Farm



Single-Shell Tank System Surveillance

Appendix A (continued)

Figure 12
RMA-256 - Outside SX Farm



Appendix A (continued)

Figure 13
RMA-256 Waste Containers



Single-Shell Tank System Surveillance

Signature

G M Neath

Gae M. Neath
Surveillance Team Lead

04/03/2008

Date