



U.S. Department of Energy
Office of River Protection

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

NOV 17 2008

08-ESQ-285

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EDMC

Mr. Mike Armstead
Procurement Contracts Manager
Washington River Protection Solutions LLC
2440 Stevens Center Place
Richland, Washington 99354

Dear Mr. Armstead:

CONTRACT NO. DE-AC27-08RV14800 – SUBMITTAL OF U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SURVEILLANCE, S-08-ESQ-TANKFARM-019, FOR THE TANK FARM SPILL RESPONSE AND REPORTING

This letter transmits the Surveillance for Tank Farm Spill Response and Reporting. The purpose of the surveillance was to determine if field conditions met the Dangerous Waste Regulations. There were no observations or findings.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Environmental Compliance Division, (509) 376-7828.

Sincerely,


Joseph C. Poniatowski
Contracting Officer

ESQ:GMN

Attachment

cc: w/attach
S. L. Dahl, Ecology
W. J. Johnson, WRPS
Administrative Record
Environmental Portal, LMSI
WRPS Correspondence

NOV 17 2008

Attachment
08-ESQ-285

Surveillance Report for the Tank Farm Spill Response and Reporting
(S-08-ESQ-TANKFARM-019)

TANK FARMS SPILL RESPONSE AND REPORTING SURVEILLANCE



OCTOBER 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

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Spill Response and Reporting Surveillance

Title of Surveillance:

Tank Farms Spill Reporting

Dates Surveillance Conducted:

October 28, 2008

Surveillance Team:

Field Surveillance: Gae Neath (Lead), Environmental Compliance Division (ECD); James Lynch, ECD Intern; Don Sommer, Support Services; and Jeff Voogd, John Guberski, and Scott Conrad, Washington River Protection Solutions LLC, Environmental Programs.

Summary of Surveillance Activities:

This surveillance evaluated field conditions to determine if spill prevention measures were in place, proper authorities were notified in the instance of a spill, the required actions were taken in the case of spilled dangerous wastes or hazardous substances, and adequate documentation of spills are available.

Documentation Reviewed for Surveillance:

- WAC 173-303-145, Spills and Discharges into the Environment; and
- TFC-ESHQ-ENV_FS-C-01, Revision E-15, Environmental Notification Procedure.

Findings and Observations:

No findings or observations were identified.

ORP Management Debriefed:

Lori Huffman, Director ECD

Spill Response and Reporting Surveillance

Surveillance Conformance Summary:

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Compliant?		Notes
			Yes	No	
Spills and Discharges	WAC 173-303-145	Clean up all released dangerous wastes or hazardous substances, or take such actions as may be required or approved by Federal, state, or local officials acting within the scope of their official responsibilities.	√		Reviewed 'Environmental Notification Procedure'; For Calendar Year (CY) 2008, currently at 21 spills - mostly diesel fuel spills; reviewed 'Spill Log' (see Appendix A) - none of the spills were of hazardous substances that met the reportable quantity threshold; all spills were cleaned-up.
		Designate and treat, store or dispose of all soils, waters, or other materials contaminated by the spill or discharge.	√		Spills were cleaned-up and disposed of properly.
	TFC-ESHQ-ENV_FS-C-01	Information must include (if available) the estimated spill or release quantity, the material safety data sheet number for the spilled or released material, time and date of spill or release, point of origin of the spill or release, estimated size of the spill "foot print," and the location of the spill or release. Do not delay initial notification while awaiting information.	√		The 'Spill Log' included the date, description, estimated quantity, and the Material Safety Data Sheet reference.

Spill Response and Reporting Surveillance

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Compliant?		Notes
			Yes	No	
		Record all spills or releases, regardless of quantity, except for small drips that can be immediately wiped up, in the Tank Operations Contract spill log.	√		All spills were recorded in the 'Spill Log'.

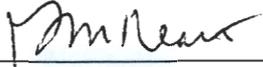
Spill Response and Reporting Surveillance

Appendix A - Spill Log Summary for CY 2008

Date	Description	Quantity	MSDS
1/9/2008	Spill <1 pint ethylene glycol outside S far gate. Cleaned up soil	< 1 pint	
2/7/2008	222-S Labs reports spill in Room 1L from a vacuum pump associated w/ ICP. Approx.1 pint of oil. No radioactive contaminants. Oil is being absorbed w/ conway pads.	1 pint	3273
2/13/2008	Crystallized mixture soil cement. Water spill inside S Farm as a result of emptying a land sprayer.	~1 gal.	35321
3/3/2008	5'x5' spill area next to the generator supporting the 'dear dome' CH2M-0800254	unknown	
3/10/2008	1 pint transmission fluid oil spilled/leaked from crane in 241-AN Farm. Clean up started 0822 am. CH2M-0800256.	1 pint	49880
4/27/2008	2-12 gallons of propylene glycol spilled/leaked from exhauster POR 08 in C Farm.	2-12 gal.	
5/12/2008	Leak of condensate to ground from cone sample truck riser adapter outside A complex. Truck was in AY-101 fir sampling. <0.5 mr/hr Beta Gamma rad reading.	1 cup	
5/14/2008	~22 gallon raw water to ground SE C Farm due to PRV lift on C Farm water supply skid. Non-ST 4511 reportable.	~22 gal	
5/14/2008	20 ml scintillation fluid spilled within 222-S Lab cell	20 ml	
5/7/2008	8 oz. of white concrete adhesive spilled on floor of conex box near MO-570, Cleaned up. Material in non-hazardous.	8 oz.	23288
8/13/2008	1 cup of grease from crane at 241-AW	1 cup	
8/15/2008	1 quart glycol to floor at 242-A Evaporator.	1 Quart	
8/24/2008	Legacy spill of 1 quart of diesel was discovered under a light plant in AN Farm. Ops. Is cleaning up spill. Rec. conversation with P Miller - spill is not reportable.	1 Quart	
9/2/2008	Lubrication oil (mineral oil) spill from a portable light plant NE of C Farm.	~2 qts.	
9/15/2008	Mineral oil from compressors north of B Plant.	1 cup	
9/19/2008	1/2 gallon diesel spill at C-104 from a portable light plant due to equipment failure.	1/2 gallon	
10/7/2008	Diesel spill from comp. adjacent to 242-A due to fuel pump failure.	1 gal.	
10/7/2008	2 ml. of methylene chloride spilled to bench top in Room1P1, in 222-S.	2 ml.	27243
10/18/2008	2 quarts of compressor condensate fell off back of utility truck at corner of route 3 and 4 environmental from PRC responded. Non-regulated.	2 qts.	
10/25/2008	1 quart overflow from 242-A compressor drip pan oil/water mixture. Not reportable	1 qt.	
10/26/2008	Septic tank overflow behind MO-979. FH has responsibility as permittee under HAN-099	6'x25' footprint	

Spill Response and Reporting Surveillance

Signature



11/06/2008

Gae M. Neath
Surveillance Team Lead

Date