

WSCF PMM Minutes August 2012

WSCF PMM Minutes for August, held on August 30, 2012 at 9:00am in the Mt Baker Room, WDOE
Attendees: Lee Fearon, Deborah Singleton, and Matt Mills

- ECO Discussion
 1. Discuss any compliance questions/issues-
 - No issues identified at this time.
 2. Conclude site visit and follow-up with any questions and/or data needs-
 - D. Singleton requested a meeting with WSCF (S. Kon) to discuss the TOC inquiry
 - L. Fearon indicated there were no further comments associated with the Dangerous Waste Training Plan based on Ecology's review.
 - D. Singleton provided guidance entitled "Types of RCRA Inspections" that will assist with future Ecology communication(s) and Site visits. (attached)
 3. Discuss site visit and agenda-
 - Site visit is still to-be-determined.
- Analytical Updates
 1. WSCF July 2012 "Flash Report".
 - Provided and attached.
 2. Per Ecology's specific request, provided by L. Fearon, WSCF agreed to provide confirmation of Groundwater well sample receipt for each specific request.
 - No requests have been made at this time.
- Significant impacts
 1. None at this time
- Administrative Record
 1. May PMM minutes for review and approval. *Signed and provided to AR*
 2. June PMM minutes for review and approval. *Signed and provided to AR*
 3. July PMM minutes for review and approval. *Signed and provided to AR*

Washington State Department of Ecology Approval of Meeting Minutes-

By

Deborah Singleton

Date

9/26/12

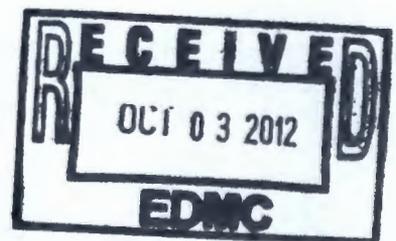
Mission Support Alliance (MSA) Approval of Meeting Minutes-

By

Matt Mills

Date

9/26/12



**WASTE SAMPLING & CHARACTERIZATION FACILITY
July 2012 FLASH REPORT**

Manager: Dan Smith

Date: August 29, 2012

I. ACCOMPLISHMENTS

Production Control

Industrial Hygiene (IH) Program

- Completed 234 asbestos analyses.
- Completed 428 Beryllium analyses.
- Completed 82 other analyses for site programs.

Other Analyses (Inorganic, Organic and RadChem)

- Completed 1525 analyses for S&GRP.
- Completed 53 analyses for ETF, TEDF 200, and TEDF 300 liquid operations.
- Completed 206 analyses for the Environmental Monitoring (EEM) program.
- Completed 47 analyses for other site customers.
- Completed 74 analyses for internal QA and waste disposal activities.

Sample Disposal

- Customer Pickup: 0 sample containers
- WSCF Disposal: 1444 sample containers

Turnaround Times

Non-Industrial Hygiene for July 2012

Reporting Interval	Groups Reported	Reported Early	Reported Late
FY-to-Date	1287	1173 (91%)	114 (9%)
Last 30 Days	135	130 (96%)	5 (4%)

Industrial Hygiene for July 2012

Reporting Interval	Groups Reported	Reported Early	Reported Late
FY-to-Date	754	716 (95%)	38 (5%)
Last 30 Days	111	111 (100%)	0 (0%)

Appendix D

Types of RCRA Inspections

Editor's Note: RCRAInfo, the database of record, recognizes the following types of RCRA inspections.⁴

CAC Corrective Action Compliance Evaluation

An evaluation of a site's compliance with the corrective action requirements of a permit or an order. When a CAC is conducted as part of another inspection type (CEI, GME, etc.), a separate entry for a CAC should be conducted for the CAC component.

CAV Compliance Assistance Visit

The compliance assistance activity that a Region or State conducts at a specific site to assist the site in achieving compliance as outlined in the OECA Operating Principles (URL: <http://www.epa.gov/compliance/resources/policies/planning/state/oprin-integ-mem.pdf>). A CAV evaluation does not include evaluation events that would otherwise qualify as another type of evaluation such as a CEI or OAM evaluation or conducted under the auspices of a confidentiality agreement via a small business or local government assistance program (sometimes referred to as an amnesty program). However, this CAV activity code would include technical site-specific compliance assistance not considered "interpretive technical assistance." CAVs are conducted without the threat of enforcement. Therefore, CAVs cannot be linked to violations or enforcement actions.

CDI Case Development Inspection

A CDI is an on-site inspection conducted for the sole purpose of gathering additional information that supports the evidence (i.e., samples, on-site record review, interview, etc.) for a potential or pending enforcement case. A CDI is performed only after an initial evaluation has resulted in the observation of potential violations.

CEI Compliance Evaluation Inspection

A CEI evaluation is primarily an on-site evaluation of the compliance status of the site with regard to all applicable RCRA Regulations and Permits (with the exception of groundwater monitoring and financial assurance requirements). Although portions of a CEI evaluation may routinely be conducted in an agency office setting, such "office" evaluations are considered an integral part of a CEI in terms of completing an evaluation. The overall evaluation of a site's compliance status may take place over multiple days necessitating multiple site visits and activities. The entire set of activities and associated effort is considered a single CEI.

⁴ Source: These inspection descriptions were copied *verbatim* from RCRAInfo, *Nationally Defined Values for Evaluation Type*, <https://rcrainfo.epa.gov/>.

Appendix D

The major function of a CEI is an overall review of the site's performance. The inspection includes an on-site examination of records and other documents maintained by the site and an evaluation of the site's compliance with all applicable requirements and adequate sampling, when necessary. Where appropriate, it includes groundwater monitoring assessment outlines or plans, closure/post-closure plans, contingency plan reviews, waste analysis plan reviews, and preparedness and prevention plan reviews. Specifically excluded from the CEI type of evaluation are financial assurance requirements and inspections of groundwater monitoring systems. A review of financial assurance requirements is most often conducted by "agency experts", and appropriately coded as a Financial Record Review (FRR) evaluation. Inspections of groundwater monitoring systems are coded as either a GME or OAM.

CSE Compliance Schedule Evaluation

An evaluation conducted to verify compliance with an enforceable compliance schedule associated with a formal enforcement action. When a CSE is conducted as part of another inspection type (CEI, GME, etc.), a separate CSE entry should be made in RCRAInfo for the CSE component.

FCI Focused Compliance Inspection

An FCI is an on-site inspection that addresses only a specific portion or Subpart of the RCRA regulations or authorized State regulations/programs. Some examples of an FCI are a Subpart CC inspection, BIF inspection, Universal Waste Rule inspection, closure verification inspection, training inspections, etc.

Nationally defined Focus Areas must be used with this evaluation type to further define the specific scope of the FCI.

FRR Financial Record Review

An extensive detailed review of a site's compliance with financial responsibility requirements. Financial Record Reviews are conducted in the Agency office and not on-site.

FSD Facility Self Disclosure

Indication that a site has self-disclosed the existence of a violation and/or performed an audit and has submitted the information as appropriate to the State or EPA.

FUI Follow-Up Inspection

A partial on-site inspection conducted to verify the status of violations cited during a previous evaluation. An FUI code value should only be used if the effort involved, or the extent of areas inspected, are insufficient to qualify as one of the more comprehensive evaluation types. Includes inspections following up to formal/informal actions where an enforceable compliance schedule has been established. Does not include any inspections involving an enforceable compliance schedule associated with a formal enforcement action. When an FUI inspection is conducted as part of another inspection type (CEI, GME, etc.), a separate FUI entry should be made in RCRAInfo for the FUI component. Please note that new violations may be cited as a result of an FUI evaluation, and those new violations would be linked to the FUI.

Appendix D

GME Groundwater Monitoring Evaluation

A detailed evaluation of the adequacy of the design and operation of a site's groundwater monitoring system as per EPA's Final RCRA Compliance Groundwater Monitoring Evaluation Guidance Document. Evaluation of the groundwater monitoring system design should be conducted by a hydrogeologist and includes the review of the owner/operator's characterization of the hydrogeology beneath hazardous waste management units, monitoring well placement and depth/spacing, and well design and construction. It is essential that the GME ensure that the owner/operator has designed an adequate groundwater monitoring system. In addition, an integral part of the GME is the review of the operation of the groundwater monitoring system through an evaluation of the owner/operator's sampling and analysis plan and its implementation. GMEs should be scheduled, to the maximum extent possible, to coincide with owner/operator sampling events to permit the field evaluation of sampling techniques. Inspectors should collect splits or conduct EPA/State sampling as a random check of groundwater quality data at any wells that may have indicated releases to support enforcement of corrective action.

A comparison of EPA/State and owner/operator analytical results can be used to assess laboratory accuracy and establish the reliability of owner/operator submitted data. A GME should encompass everything covered in the CEI for groundwater monitoring facilities. In addition, GMEs should include:

- a. a detailed investigation of the engineering features and effectiveness of the groundwater monitoring system;
- b. a detailed review of the site's groundwater sampling and analysis plan;
- c. re-calculation of statistics at detection monitoring facilities to ensure that the site should not be in assessment;
- d. detailed examination of the site's assessment monitoring plan and field implementation;
- e. re-evaluation of groundwater flow direction; and
- f. a substantial amount of samp[ling].

LBN Land Ban Restrictions Inspection

An inspection of land disposal restriction requirements. Where Land-Ban is inspected in conjunction with another inspection type (CEI, CME, etc.), a separate Handler Evaluation form should be submitted reporting the Land-Ban component.

Note: This code is not available for new data entry.

NR No 3007 Information Request Received

Agency conducted an in-agency office review and determined a failure to respond to a 3007 information request.

NRR Non-financial Record Review

An evaluation conducted in the Agency office involving a detailed review of non-financial records.

Appendix D

OAM Operation and Maintenance Inspection

The Operation and Maintenance Inspection is a periodic inspection of how well a groundwater monitoring system continues to function once it is considered well designed. The inspection focuses on the condition of wells and sampling devices. Evaluation of well recovery notes, turbidity of water, total depth, depth to water, etc. should be made and compared to historic data. Sampling devices should be tested and if necessary pulled and visually inspected. The findings of an O&M inspection will indicate whether case development is warranted and/or will serve to focus future GMEs. The inspector should be experienced in evaluation of groundwater monitoring systems, e.g., hydrogeologist. This inspection can include sampling.

SNN No Longer a Significant Non-Complier (SNC)

A determination has been made to remove the SNC designation for a site.

Note: Entry of an SNN record is required to remove a site from being an SNC.

Business Rule: If an SNY and an SNN record are entered by the same agency on the same day, the site will remain an SNC unless the SNY record has "Site should not be a SNC" as the first words in the SNY record's NOTES field.

SNY A Significant Non-Complier (SNC)

A determination has been made to designate a site as an SNC using guidelines as set forth in the current version of the Hazardous Waste Civil Enforcement Response Policy (ERP).

An SNC is a site that has caused actual exposure or a substantial likelihood of exposure to hazardous waste or hazardous waste constituents; is a chronic or recalcitrant violator, or deviates substantially from the terms of a permit, order, agreement or from RCRA statutory or regulatory requirements.

In evaluating whether there has been actual or likely exposure to hazardous waste or hazardous waste constituents, implementers should consider both environmental and human health concerns. However, environmental impact or a substantial likelihood of impact alone is sufficient to cause a violator to be an SNC, particularly when the environmental media affected require special protection (e.g., wetlands or sources of underground drinking water). Additionally, when deciding whether a violator meets this criterion, implementers should consider the potential exposure of workers to hazardous waste or hazardous waste constituents.

Further, although consideration should be given to compliance status with other environmental statutes and regulations, an SNC in RCRAInfo should be linked to all applicable violations that contributed to the SNC designation, where appropriate. Although there are benefits to doing so, linkage of SNY determination to specific RCRA violations that contributed to the SNC determination is optional.

Note: It is important to enter the SNY designation promptly upon designation.

Business Rule: If an SNY and SNN record are entered by the same agency on the same day, the site will remain an SNC unless the SNY record has "Site should not be a SNC" as the first words in the SNY record's NOTES field.

End of Report