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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

19-ESQ-0003

OCT 29 2018

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

RESPONSE TO DANGEROUS WASTE COMPLIANCE INSPECTION ON JANUARY 11, 2018, AT B PLANT, RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NOs.: 18.622

This is in response to the August 2, 2018, (18-NWP-128) letter regarding the Non-Financial Records Review inspection of B Plant, performed on January 11, 2018. Your letter was officially received on August 7, 2018. The U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) have reviewed the item identified as an alleged non-compliance with Dangerous Waste Regulations cited by the Washington State Department of Ecology.

The white materials found on the B Plant floor were identified through process knowledge by CHPRC to be: (1) white lead based paint, flaking from overhead piping and (2) expansion joint compound from an overhead expansion joint. Table 6-1 of the B Plant Surveillance and Maintenance Plan (DOE/RL-99-24, Revision 3) notes the existence of lead paint throughout the facility. RL and CHPRC feel that it is sufficient and reliable to use the process knowledge to make the determination that the white lead based paint designates as dangerous waste and is assigned the Waste Code D008 pursuant to Washington Administrative Code (WAC) 173-303-070(3)(c).

The expansion joint compound from overhead expansion joints was identified through process knowledge by CHPRC to consist of asphalt, plant, and mineral reinforcing fibers. Plant fibers are non-hazardous. Mineral Fibers were frequently asbestos to add strength and fire retardant properties. Based on historical process knowledge, the asbestos content is in the 10-20 percent range and is considered a Class 2 material. Asphaltic materials that would only designate for the presence of Polycyclic Aromatic Hydrocarbons by WAC 173-303-100(6) that have been used for structural and construction purposes are considered to be excluded from regulation per WAC 173-303-071(3)(e).

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The white lead based paint and expansion joint compound materials will be disposed of as part of the final Comprehensive Environmental Resource Compensation Liability Act action at B Plant.

If you have any questions, please contact me, or your staff may contact Brian J. Stickney, Acting Assistant Manager for Safety and Environment, on (509) 376-9079.

Sincerely,



Doug S. Shoop
Manager

ESQ:ACM

cc: Dave B. Bartus, EPA
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Kevin Schanilec, EPA
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Connie J. Simiele, CHPRC
Ron R. Skinnerland, Ecology
Steve A. Szendre, MSA
Administrative Record, H6-08: TS-2-7 (Hardcopy)
Ecology NWP Library (Hardcopy)
Environmental Portal, G3-35
HF Operating Record (J. K. Perry, MSA A3-01)