

94-039

0039284

SUMMARY OF REGULATORY AGENCY VISIT

DATE: September 1, 1994

REGULATORY AGENCY: Washington Department of Ecology

REGULATORY AGENCY PERSONNEL: Mr. Robert Wilson, RCRA Compliance Inspector
Ms. Alisa Huckaby, Unit Manager

WHC REPRESENTATIVE: Mr. S. A. Szendre, RCRA Field Services
Ms. M. L. Bedick, RCRA Field Services

FACILITY(S) VISITED: Transuranic Storage and Assay Facility (TRUSAF)

FACILITY CONTACTS: Mr. M. D. Aichele, Manager, Solid Waste Operations
Mr. J. W. Pratt, Manager, TRUSAF Operations
Ms. S. E. Campbell, Environmental Compliance Officer
Mr. T. H. Davies, RL Facility Representative

PURPOSE OF VISIT:

Follow-up Ecology inspection of the Transuranic Storage and Assay Facility (TRUSAF).

SUMMARY OF VISIT:

On September 1, 1994, Mr. Robert Wilson and Ms. Alisa Huckaby, Ecology, visited the TRUSAF. Mr. Wilson used the visit to verify the completion of corrective actions listed in a Notice of Violation (NOV) stemming from a previous Ecology inspection of the TRUSAF in November 1993.

The inspectors met with TRUSAF management and the RL Site Rep., Mr. T. H. Davies. Mr. Wilson explained why he was there and what he expected to accomplish on the visit. The inspectors then observed the Solid Waste Information and Tracking System (SWITS) data base. The SWITS is currently being used to locate and track waste drums in the TRUSAF. The inspectors randomly selected 3 drum numbers and requested information on the drums. An operator used the SWITS to locate the drums and verify that they matched their locations within the facility. All the drums were located on the SWITS.

During a walkthrough of the facility, the inspectors noted a couple of items that raised some questions, but most of the items were not considered significant concerns by the inspectors. Those items noted were:

- y Two overpack drums of waste did not have a Hazardous Waste or a Major Risk label.
- y Waste codes were not listed on the Hazardous Waste labels on a few drums. Upon review of the applicable regulations, no reference was found that requires these codes to be written on the labels. Evaluation of this issue is continuing.



- y There were a few drums of TRU Waste that had been assayed and staged as "awaiting further evaluation". The documentation attached to the drums showed that there were some questions raised from the assay results and further evaluation is needed. Ms. Huckaby's concern was that the drums were not being properly tracked. Mr. Aichele relayed that the drums were being properly and safely stored within the Facility and the contents would be verified when schedule permits.
- y Building Emergency/Contingency Plan needing updated. Currently Solid Waste is revising the Plan.

The inspectors questioned many aspects of the Facility operation. These questions and the facilities responses may be of benefit to other Hanford facility personnel. Those questions are listed below.

1. Is any waste received by TRUSAF ever sent back to the generator? No, many of the wastes received by TRUSAF have been on 90-day clocks, so it has been determined that the Washington Administration Code would not allow the generator to retain possession of the waste. The waste is stored safely at the TRUSAF while the questions are resolved.
2. How are you storing incompatible waste drums? The Facility uses spacing to safely store incompatible wastes. Where possible, incompatible materials are stored in separated locations within the Facility.
3. Are drums entered into SWITS as soon as they are placed in the Facility and, are the coordinates entered in the SWITS immediately? When the drums are placed into the Facility and the drum number is entered into the SWITS and the location is noted as being on "Floor 1". After the drum is assayed and the contents verified, the drum is then placed with other compatible waste drums within the Facility and the waste category and new location coordinates is input into the SWITS.

Documents requested by the inspectors are listed below.

- y Copies of the SWITS information for drums RHZ-102-A14967, RHZ-102-A15110, RH-A-87-067, RHZ-212-A19448 (Supplied)
- y QA/QC Audits performed on the assay process for 1993-1994
- y Vendor information on the floor coating applied to the floor of TRUSAF
- y Drum numbers of the TRU waste drums that were being held for further evaluation.

The inspectors relayed that they were impressed with improvements made since the previous inspection. Ms. Huckaby said that it appeared that Mr. Pratt was very knowledgeable of the operation and she was satisfied with his responses given to her inquiries. Mr. Wilson said that even though they found a couple of "minor" issues, he expects to be able to close-out all the remaining open items in the NOV. He said he intends to issue a letter to RL relaying that Ecology considers the inspection "closed" as soon as he can complete his report.