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OFFICE OF RIVER PROTECTION
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

AUG 10 2018

18-ECD-0053

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

Ms. Smith:

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY DANGEROUS WASTE COMPLIANCE INSPECTION NO. 17.592 CLOSED OUT ON JUNE 14, 2018

Reference: Ecology letter from E. Holbrook to B.T. Vance, ORP, and M. Lindholm, WRPS, "Dangerous Waste Compliance Inspection on May 18, 2017 at Double Shell Tank System and 204-AR Waste Unloading Station, RCRA Site ID: WA7890008967, NWP Compliance Index No 17.592," 18-NWP-095, dated June 14, 2018.

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This letter responds to the Washington State Department of Ecology's (Ecology) inspection report (Reference) on the Double-Shell Tank System and 204-AR Waste Unloading Station performed on May 18, 2017. The U.S. Department of Energy, Office of River Protection and Washington River Protection Solutions LLC have reviewed the three observations and the single response action required by Ecology in the Reference. The attached information addresses Ecology's required action on Observation 2.

If you have any questions, please contact Bryan R. Trimmerger, Environmental Compliance Division, (509) 376-2674, or Jessica A. Joyner, Environmental Protection, Washington River Protection Solutions LLC, (509) 376-7533.

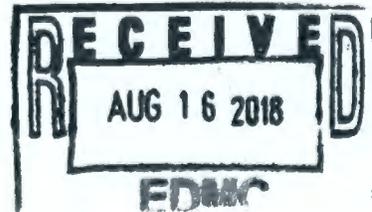
Mark A. Lindholm
President and Project Manager
Washington River Protection Solutions LLC

Brian T. Vance, Manager
Office of River Protection

ECD:BRT

Attachment

cc: See page 2



**Attachment
18-ECD-0053
(3 Pages Excluding Cover Sheet)**

**U.S. Department of Energy, Office of River Protection
and Washington River Protection Solutions LLC
Response to Observation 2**

U.S. Department of Energy, Office of River Protection
and Washington River Protection Solutions LLC
Response to Observation 2

Provided below is the U.S. Department of Energy, Office of River Protection (ORP) and Washington River Protection Solutions LLC (WRPS) response to the cited Washington State Department of Ecology (Ecology) "Observations" and "Action Required" Number 2 as documented within 18-NWP-095, "Dangerous Waste Compliance Inspection on May 18, 2017 at the Double Shell Tank System and 204-AR Waste Unloading Station, RCRA Site ID: WA7890008967, NWP Compliance Index No 17.592."

- 2) "WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C-Condition I.A Effect of Permit.

WAC 173-303-320(1), The owner or operator must inspect his facility to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or a threat to human health. The owner or operator must conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

WAC 173-303-320(2) The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. In addition:

- (a) The schedule must be kept at the facility;
- (b) The schedule must identify the types of problems which are to be looked for during inspections;
- (c) The schedule must indicate the frequency of inspection for specific items. The frequency should be based on the rate of possible deterioration of equipment, and the probability of an environmental or human health incident. Areas subject to spills must be inspected daily when in use. At a minimum the inspection schedule must also include the applicable items and frequencies required for the specific waste management methods described in 40 C.F.R. Part 265 Subparts F through R, 265.1033, 265.1052, 265.1053, 265.1058 and 265.1084 through 265.1090, for interim status facilities and in WAC 173-303-630 through 173-303-680, and 40 C.F.R. 264.1033, 264.1052, 264.1053, 264.1058 and 264.1083 through 264.1089 for final status facilities; and"

Ecology Observation:

"USDOE-ORP and WRPS has not developed and followed a written schedule for inspecting emergency equipment identified as annulus pump pits (See Table 4)."

Table 4: Double Shell Tank System Components

Tank System	Annulus Pump Pit
241-AN-101	AN-01B
241-AN-102	AN-02B
241-AN-103	AN-03B
241-AN-104	AN-04B
241-AN-105	AN-05B
241-AN-106	AN-06B
241-AN-107	AN-07B
241-AP-101	AP-01B
241-AP-102	AP-02B
241-AP-103	AP-03B
241-AP-104	AP-04B
241-AP-105	AP-05B
241-AP-106	AP-06B
241-AP-107	AP-07B
241-AP-108	AP-08B
241-AW-101	AW-01B
241-AW-102	AW-02B
241-AW-103	AW-03B
241-AW-104	AW-04B
241-AW-105	AW-05B
241-AW-106	AW-06B
241-SY-101	SY-01B
241-SY-102	SY-02B
241-SY-103	SY-03B
241-AY-101	AY-01F
241-AY-102	AY-02F
241-AZ-101	AZ-01F
241-AZ-102	AZ-02F

Ecology Action Required:

“Within 60 days upon receipt of this compliance report, USDOE-ORP and WRPS must develop and follow a written schedule for inspecting emergency equipment identified as annulus pump pits (See Table 4).”

ORP and WRPS Response:

Consistent with previous Ecology inspection requests for ORP and WRPS to identify deferred use or emergency use double-shell tank components as having either: 1) future mission use; or 2) no future mission use, the annulus pump pits identified in Table 4 are designated as having "no future mission use" and are identified for closure. Workshops are currently underway with Ecology to establish inspection standards and documentation protocols for component closures as part of the Rev 9 Dangerous Waste Permit negotiations.

Ms. Alexandra K. Smith
18-ECD-0053

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AUG 10 2018

cc w/attach:

K.A. Conaway, Ecology

J.J. Lyon, Ecology

E.T. Faust, RL

P.K. Brockman, WRPS

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Administrative Record

Environmental Portal

WRPS Correspondence