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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99116 • (509) 546-2990

October 30, 1992

CERTIFIED MAIL



Mr. John D. Wagoner, Manager  
U. S. Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, WA 99352

ID Number: WA7890008967

Date and Time of Inspection:  
July 16, 1992, 9:50 - 12:00 a.m.  
July 23, 1992, 10:51 - 11:20 a.m.

Mr. William R. Wiley, Director  
Pacific Northwest Laboratories  
P.O. Box 999  
Richland, WA 99352

Dear Messrs. Wagoner and Wiley:

Re: Dangerous Waste Compliance Inspection for 305-B Storage Facility

Thank you for the assistance of Pacific Northwest Laboratories (PNL) personnel during the inspection of the 305-B storage facility on July 16, and July 23, 1992. During these inspections, my staff documented several areas of non-compliance by PNL with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC) at the 300 Area, 305-B facility. Responsibility for corrective actions for these items of non-compliance is being directed to the operator (PNL) and verification of completion of actions is directed to the owner, the U. S. Department of Energy (USDOE-RL).

The violations documented in the 305-B storage facility inspection report identify a failure by PNL to properly manage dangerous waste. The 305-B storage facility RCRA Part B permit application has been received by Ecology and is in the review process. It is necessary for USDOE-RL and PNL to take any actions necessary to ensure these deficiencies are corrected in a timely manner to receive permit and/or meet WAC's. Violations noted include the following:

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Class II Violations

- 9413137.1724
- o WAC 173-303-300 - General waste analysis.  
Failure to sample, test and redesignate waste per subsection (4)(a).
  - o WAC 173-303-350 - Contingency plan and emergency procedures.  
Failure to list responsible emergency and contingency plan coordinators per subsection (3)(d) required under WAC 173-303-360 (1).
  - o WAC 173-303-380 - Facility recordkeeping.  
Failure to record and maintain in the operating record the location of each dangerous waste within the facility and the quantity at each location per subsection (1)(b).
  - o WAC 173-303-630 - Use and management of containers.  
Failure to manage condition of containers per subsection (2).  
Failure to properly label containers per subsection (3).  
Failure to comply with WAC storage limits equivalent with Uniform Fire Code per subsection (8)(b).

Staff is available to assist USDOE-RL and/or PNL in completing these compliance items within the time specified. Failure to correct these items may result in the issuance of an administrative order and/or penalty as authorized under RCW 70.105.095 (Hazardous Waste Management).

1. Within thirty (30) calendar days of receipt of this letter, PNL shall submit to Ecology a schedule to sample and designate container #13040.
2. Within thirty (30) calendar days of receipt of this letter, PNL shall provide Ecology with a list of the responsible emergency and contingency plan coordinators.
3. Within thirty (30) calendar days of receipt of this letter, PNL shall provide Ecology with an accurate inventory of waste stored within the 305-B facility using the required units of measure.

John D. Wagoner  
William R. Wiley  
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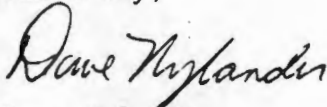
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4. Within thirty (30) calendar days of receipt of this letter, PNL shall properly affix labels to drums and containers throughout the 305-B facility.
5. Within thirty (30) calendar days of receipt of this letter, PNL shall verify compliance with WAC storage requirements under the Uniform Fire Code.

If you have any questions or technical inquiries concerning this matter, please contact me at (509) 546-2990, or G. Thomas Tebb of my staff at (509) 546-4302. Please complete the enclosed certificate of completion and submit to this Department by December 14, 1992.

Sincerely,



Dave Nylander  
Office Manager  
Nuclear and Mixed Waste Management Program/Kennewick

DN:gd  
Enclosures (2)

cc: Roger Stanley, Ecology  
Dave Jansen, Ecology  
Scott McKinney, Ecology  
Jim Bauer, DOE  
Kyle Webster, PNL  
W. J. Bjorklund, PNL  
Administrative Record

9413137.1725



FACT SHEET

Owner U. S. Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, WA 99352

Operator Pacific Northwest Laboratories  
P.O. Box 999  
Richland, WA 99352

Facility/Location 305-B Storage Facility, 300 Area

Contact Glenn T. Thornton (new manager is Kyle Webster)  
(509) 376-7688

Activity Compliance inspection conducted in support of 305-B  
hazardous waste storage Part B permit issuance.

Background

The 305-B hazardous waste storage facility is a one-story frame and masonry building with a basement, constructed in the early 1950's. An attached two-story-high metal and concrete building was constructed in January 1978. The facility has been specially modified to provide storage of many types of dangerous wastes.

The 305-B facility has been used for dangerous waste storage since March 1989, operating under interim status. Wastes, primarily from Pacific Northwest Laboratories (PNL)-operated research facilities, are brought to the facility for consolidation either through lab packing, bulking, or simple accumulation of "truckload quantities" in preparation for recycling, treatment, or disposal. No treatment or disposal of waste is performed at the facility.

Finding #1 FAILURE TO SAMPLE, TEST AND REDESIGNATE WASTE

WAC 173-303-300 General waste analysis. (4) Analysis shall be repeated as necessary to ensure that it is accurate and current. At a minimum, analysis must be repeated: (a) When the owner or operator has been notified, or has reason to believe, that the process or operation generating the dangerous wastes has significantly changed.

A note on the MSDS for container #13040, originally containing AEROSOL OT 75% Surfactant, read "ethanol evaporated off prior to becoming waste." The waste remaining in the container is not accurately represented by the MSDS. A waste analysis has not been repeated.

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Finding #2 FAILURE TO MAINTAIN CURRENT CONTINGENCY PLAN

WAC 173-303-350 Contingency plan and emergency procedures. (3)(d) A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under WAC 173-303-360(1).

Mr. Thornton stated 305-B is using the Emergency plan in the Part B permit application. The Part B Permit application, Section 7.2, page 703 states that, due to security requirements, names or phone numbers of personnel acting as emergency contacts are not released. When Steve asked Mr. Thornton how facility personnel knew who the emergency contacts were, he retrieved an old list from a bulletin board. The list was from the previous emergency plan, and Mr. Thornton said it was not maintained with current information.

Finding #3 FAILURE TO USE SPECIFIED UNITS OF MEASUREMENT

WAC 173-303-380 Facility recordkeeping. (1) Operating record. The owner or operator of a facility shall keep a written operating record at his facility. The following information shall be recorded . . . (b) The location of each dangerous waste within the facility and the quantity at each location. . .

The operating record failed to report accurate quantities of dangerous waste being stored in specific locations. The inspection team was informed by Mr. Thornton that such information was tracked using a computerized data base. However, the data base was inaccurate and did not provide the required information as to the location of each dangerous waste within the facility and the quantity at each location.

Finding #4 FAILURE TO PROPERLY LABEL OR MANAGE CONTAINERS

WAC 173-303-630 Use and management of containers. (2) Condition of containers. If a container holding dangerous waste is not in good condition (e.g., severe rusting, apparent structural defects) . . . the owner or operator must transfer the dangerous waste from the container to a container that is in good condition . . . (3) Identification of containers. The owner or operator must label containers in a manner which adequately identifies the major risk(s) associated with the contents of the containers for employees, emergency response personnel and the public . . . The owner or operator must affix labels upon transfer of dangerous wastes from one container to another. The owner or operator must destroy or otherwise remove labels from the emptied container . . . (8) Special requirements for ignitable or reactive waste. . . (b) Special requirements for ignitable or reactive waste. . . (b) The owner or operator shall design, operate, and maintain ignitable waste and reactive waste . . . container storage in a manner equivalent with the Uniform Fire Code.

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A dented container (#13040) was observed in the non/ORM/state-only storage area of the nonradioactive high bay. Mr. Thornton reported that the container was dented when it arrived at 305-B in 1990. The WAC requires containers not in good condition to be transferred from the damaged container into one of good condition.

On the date of our inspection, drums in the mixed waste storage area (17 contained waste and approximately 8 were empty) and 1 container in the radioactive flammable liquid storage area were not properly marked/labeled. Waste management personnel did not affix labels or apply markings upon transfer of dangerous wastes from one container to another, nor did they destroy or otherwise remove labels from the emptied containers. Instead, all information dictating the contents of the container, unique container number, and point of origin were on individual log sheets (CDRR) laying on top of the containers, and were not secured.

During our inspection of the radioactive mixed waste storage area (cell #7) located in the basement, Laura Russell commented on an 8 gallon container in the secondary containment area used for PCB's. Mr. Selby stated that it was labeled wrong and he removed the hazardous waste sticker as we stood there. Pictures were taken before and after the removal of the dangerous waste label.

When Mr. Selby opened the flammable radioactive mixed waste storage containment area (cell #9), Steve Moore noticed that a drum in the doorway was marked only with a flammable sticker and stenciled with 325/300 on the side. Mr. Selby immediately took a black felt tip marker and began to write on its lid. Pictures were also taken while he was writing.

During routine inspections by PNL personnel, Drum Action Sheets are filled out and placed on top of drums needing action (e.g., labels missing, etc.). However, the Drum Action Sheets are not dated, and there is no way of knowing how long the action has been required.

The Uniform Fire Code (UFC) storage requirements were exceeded from January through April, 1992. Waste acceptance at 305-B, in lieu of exceeding the UFC requirements, was a known and deliberate act. In Glenn Thornton's memo dated July 30, 1992, he stated, "we chose to [sic] above UFC limits due to contracting difficulties which precluded off-site movement of flammable liquid wastes. This forced us to make a choice between non-compliance with 90 day storage limits in some Battelle laboratories or temporary non-compliance with UFC limits at 305-B." Ecology was not informed at the time of PNL's decision to violate WAC storage requirements.

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Please complete this form and return to Greta P. Davis at 7601 W. Clearwater Ave., Suite 102, Kennewick, WA 99336 by December 14, 1992.

CERTIFICATE OF COMPLETION

As an authorized representative of U.S. Department of Energy, I certify, to the best of my knowledge, the completion status of our facility located on the Hanford Reservation, 300 Area, 305-B Storage Facility ID Number WA7890008967 as shown below.

COMPLETION STATUS

(representative should list completion date & initial each item)

<u>Items of Non-compliance (WAC 173-303)</u>	<u>Required Completion Date</u>	<u>Date of Completion</u>	<u>Initials</u>	<u>Comments</u>
Item 1 - 300 (4)(a)	_____	_____	_____	_____
Item 2 - 350 (3)(d)	_____	_____	_____	_____
Item 3 - 380 (1)(b)	_____	_____	_____	_____
Item 4 - 630 (2), (3), and (8)(b)	_____	_____	_____	_____

\_\_\_\_\_  
Signature of Authorized Representative

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Date

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