



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

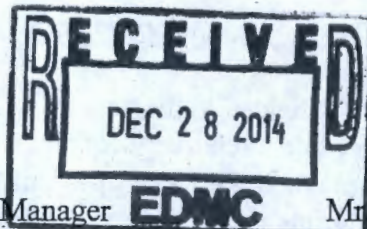
3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

1227031

[1501050006]

December 24, 2014

14-NWP-256



Ms. Stacy Charboneau, Manager  
Richland Operations Office  
PO Box 550, MSIN: A7-50  
Richland, Washington 99352

EDMC

Mr. John A. Ciucci, President and CEO  
CH2M HILL Plateau Remediation Company  
PO Box 1600, MSIN: H7-30  
Richland, Washington 99352

Re: In Response to the United States Department of Energy (USDOE) and CH2M Hill Plateau Remediation Company's (CHPRC) Email Received on November 5, 2014, "CHPRC Satellite Accumulation Area Report" RCRA Site ID WA7890008967

Dear Ms. Charboneau and Mr. Ciucci:

On October 20, 2014, the Department of Ecology (Ecology) sent an email to USDOE and CHPRC regarding the management of Satellite Accumulation in the 400 Area and 200 East Area. On October 28, 2014, Ecology met with USDOE, CHPRC, Pacific Northwest National Laboratory, Mission Support Alliance, and Washington River Protection Solutions at CHPRC's request to review the subject matter in the October 20 Ecology email.

Ecology Compliance provides the following information to USDOE and CHPRC for the criteria that we will use with future inspections of generator management activities.

We emphasize the following text from Ecology *Technical Information Memorandum*, Publication Number: 94-120 (TIM 94-120)

"This document does not replace the state or federal regulations dealing with the proper management of dangerous (hazardous) waste. Please refer to Chapter 173-303 WAC, and federal 40 CFR regulations for complete definitions and regulatory citations."

Because of the numerous scenarios that may present themselves when reviewing a generator's satellite accumulation area (SAA) activities, Ecology inspectors will use Washington Administrative Code (WAC) 173-303-200(2). Below are three instances where Ecology and the dangerous waste regulations maintain stricter management requirements than federal regulations (40 CFR. 262.34(c)):

First, the requirement of "During routine operations" is found in WAC 173-303-040, Definitions:

"'Satellite accumulation area' means a location at or near any point of generation where hazardous waste is initially accumulated in containers (**during routine operations**) prior to consolidation at a designated ninety-day accumulation area or storage area. The area



must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes into the satellite containers.”  
(Emphasis added)

“During Routine Operations” is described in Ecology TIM 94-120.

“The term ‘during routine operations’ is intended to limit the provisions of satellite accumulation to wastes that are generated on a relatively continuous basis. **Wastes generated on an infrequent or one time basis (for example, spills) cannot be held for extended periods in satellite accumulation areas.** Ecology does not intend to allow cleanup material to accumulate or be stored indefinitely in a satellite accumulation area container.” (Emphasis added)

Ecology TIM 94-120 (emphasis above) provides spills as an example of what cannot be held for extended periods in SAAs.

Ecology sees the accumulation of 6.8 pounds of mixed waste debris and one tritium exit sign (in a 55 gallon drum) adjacent to 6.4 pounds of galvanized aerosol cans (in a 16 gallon drum) as an example of infrequent and an extended period of generation. The 400 Area Dangerous Waste Management Unit (DWMU) SAA records show this accumulation began January 31, 2013 and possibly earlier.

The status of the 400 Area DWMU (cold and dark) and the activities that the Surveillance and Maintenance personnel carry out indicate no routine operations associated with this generated waste. Therefore, the need for the SAA is unnecessary.

The second requirement that creates a more stringent SAA management practice than 40 CFR § 262.34(c) requires, is “Per Waste Stream” WAC 173-303-200(2)(b).

WAC 173-303-200(2):

(2) Satellite accumulation.

(a) A generator may accumulate as much as fifty-five gallons of dangerous waste or one quart of acutely hazardous waste in containers at or near any point of generation where waste initially accumulates (defined as a satellite accumulation area in WAC 173-303-040). The satellite area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes to a satellite container. Satellite accumulation is allowed without a permit provided the generator:

(i) Complies with WAC 173-303-630 (2), (4), (5) (a) and (b), (8)(a), and (9) (a) and (b); and

(ii) Complies with subsection (1)(d) of this section.

(b) When fifty-five gallons of dangerous waste or one quart of acutely hazardous waste is accumulated per waste stream, the container(s) must be marked immediately with the accumulation date and moved within three days to a designated storage or accumulation area.

(c) On a case-by-case basis the department may require the satellite area to be managed in accordance with all or some of the requirements under subsection (1) of this section, if the nature of the wastes being accumulated, a history of spills or releases from accumulated containers, or other factors are determined by the department to be a threat or potential threat to human health or the environment.

Individual Waste Stream (Per Waste Stream) is described in Ecology TIM 94-120:

“Each individual waste stream has a distinct, separate point of generation. Individual waste streams include:

- Wastes that are physically or chemically different from each other.
- Wastes that are generated from different types of processes.
- Wastes of the same type that are generated at different points in the same process or at different process locations.”

The WAC 173-303-200(2) and Ecology TIM 94-120 provide definitive criteria for per waste stream (individual waste streams). TIM 94-120 also provides two examples of how individual waste streams can be accumulated in a SAA, depending on the point of generation circumstances (process and location) and the contents.

When this can seem somewhat complicated is that a generator may be able to accumulate per waste stream (individual waste streams) in one SAA. However, a generator **cannot** do so if the point of generation for two waste streams (Tritium Signs and Galvanized Aerosol Cans) is generated at **two different locations/processes** (point of generation). This could lead to a violation with 173-303-200(2)(a). (Emphasis added)

The Third requirement, WAC 173-303-200(2)(c) provides Ecology the ability to apply all of 173-303-200(1) to any SAA on a case by case basis.

The requirements established in WAC 173-303-200(2) are the criteria Ecology will use for future generator inspections of the 400 Area.

If you have questions about hazardous waste management or environmental concerns, please contact me at [edward.holbrook@ecy.wa.gov](mailto:edward.holbrook@ecy.wa.gov) or (509)372-7909.

Sincerely,



Edward Holbrook  
Hazardous Waste Inspector  
Nuclear Waste Program

tkb

cc: See page 4

cc electronic:

Dennis Faulk, EPA  
Jack Boller, EPA  
Kevin Schanilec, EPA  
Allan Cawrse, CHPRC  
Moses Jaraysi, CHPRC  
Ken Niles, ODOE  
Rick Bond, Ecology  
Edward Holbrook, Ecology  
John Price, Ecology  
CHPRC Correspondence Control  
USDOE-RL Correspondence Control  
Environmental Portal  
Hanford Facility Operating Record

cc: Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Russell Jim, YN  
Steve Hudson, HAB  
Administrative Record: 400 Area  
NWP Central File  
NWP Reader File