



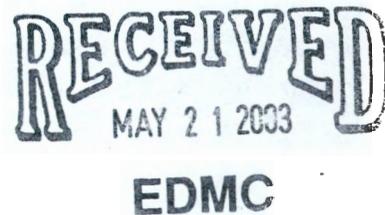
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

May 16, 2003

Mr. Keith Klein
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352



Mr. Michael Hughes
Bechtel Hanford, Inc.
3350 George Washington Way, MSIN: H0-04
Richland, Washington 99352

Dear Messrs. Klein and Hughes:

Re: Inspection of the Environmental Restoration Disposal Facility

The Washington State Department of Ecology (Ecology) and the United States Environmental Protection Agency (EPA) conducted a joint inspection of the Environmental Restoration Disposal Facility (ERDF) Waste Staging Area on April 3, 2003. The ERDF is managed for the United States Department of Energy (USDOE) by Bechtel Hanford, Inc. (BHI).

The ERDF Waste Staging Area inspection was a planned inspection that was requested by the Environmental Restoration Project group. The ERDF is an EPA lead site located adjacent to the 200 West Area of the Hanford site. The Waste Staging Area is a staging area within ERDF containing approximately 600 barrels of waste that had been removed from the 618-4 Burial Ground. These barrels comprise three waste streams. The waste streams are: (1) Depleted Uranium Chips in Oil, (2) dry Uranium Oxide (UO₂) powder, and (3) stabilized oil. The focus of the inspection was to determine if the waste had been properly designated. Container management was also reviewed.

No violations were noted as a result of the April 3, 2003, inspection of the ERDF Waste Staging Area; however, the following concerns are brought to your attention:

VIOLATIONS:

No violations were noted.



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CONCERNS:

1. No flashpoint analyses were performed on either the depleted uranium chip oil or in the oils prior to stabilization. The actual type of oil or source of the oil that was found in the drums of waste removed from the 618-4 Burial Ground was unknown. It is unknown if any other fluids were added in the past during disposal proceedings that might cause some of the oils to designate as D001 for ignitability. In the future, unknown oils should be screened for D001 characteristics.
2. During the ERDF Waste Staging Area inspection, we visited the re-fueling facility located on the site. We noticed that several swivel fittings on the large 12,000-gallon diesel tank had leaked fuel onto the ground. We also noticed that there was spilled fuel residue on the ground in the vicinity of the re-fueling nozzles. The leaking swivel fittings need to be repaired. Drip pans need to be provided and used during refueling operations. The fuel contaminated soils need to be excavated and replaced with clean material. The contaminated soils need to be properly treated or disposed.
3. The revised (Rev. 1) version of the ERDF Waste Staging Area Operating Procedure states that all containers that require ventilation are to be vented. The revision, however, does not state which containers on the pad require ventilation. The ERDF Waste Staging Area Operating Procedure should be revised so that the users of the procedure know which containers require ventilation. If instructions for determining which containers require ventilation are provided in a separate document, that document should be referenced in the ERDF Waste Staging Area Operating Procedure.

This letter serves to close this inspection.

Any questions concerning this letter should be directed to Jeff Ayres of Ecology at (509) 736-5717 or Dave Einan of EPA at (509) 376-3883.

Sincerely,



Jeff Ayres
Compliance Inspector
Nuclear Waste Program
Washington State Department of Ecology



David Einan
ERDF Project Manager
U.S. Environmental Protection Agency

cc: Owen Robertson, USDOE
Jack Donnelly, BHI
Todd Martin, HAB
Rick Gay, CTUIR

Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, OOE
Administrative Record: ERDF