



U.S. Department of Energy
Office of River Protection

0077985

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

JUN 24 2008

08-ESQ-124

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JUN 25 2008

EDMC

Mr. John C. Fulton, President
and Chief Executive Officer
CH2M HILL Hanford Group, Inc.
2440 Stevens Center Place
Richland, Washington 99354

Dear Mr. Fulton:

CONTRACT NO. DE-AC27-99RL14047 – SUBMITTAL OF U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION SURVEILLANCE S-08-ESQ-TANKFARM-014, FOR THE VEHICLE MAINTENANCE PROGRAM

This letter transmits Surveillance S-08-ESQ-TANKFARM-014 for the Vehicle Maintenance Program. The purpose of the surveillance was to determine if field conditions met the Dangerous Waste Regulations. There were no findings or observations.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Environmental Compliance Division, (509) 376-7828.

Sincerely,

William J. Taylor, Assistant Manager
Office of Environmental Safety and Quality

ESQ:GMN

Attachment

cc w/attach:
S. L. Dahl, Ecology
Administrative Record
Environmental Portal, LMSI
CH2M HILL Correspondence

Attachment
08-ESQ-124

Vehicle Maintenance Surveillance Report S-08-ESQ-TANKFARM-014

VEHICLE MAINTENANCE SURVEILLANCE REPORT

S-08-ESQ-TANKFARM-014



MAY 2008

Office of Environmental Safety and Quality

U.S. Department of Energy
Office of River Protection
P.O. Box 450, H6-60
Richland, Washington 99352

Vehicle Maintenance Surveillance

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Vehicle Maintenance Surveillance

Title of Surveillance:

Vehicle Maintenance Program

Dates Surveillance Conducted:

May 27, 2008.

Surveillance Team:

Field Surveillance: Gae Neath (Lead), Environmental Compliance Division (ECD); and Don Sommer, Support Services; and Ed Lamm, Fluor Hanford.

Summary of Surveillance Activities:

This surveillance evaluated field conditions to determine if the dangerous waste management practices supporting the vehicle maintenance program met Dangerous Waste Regulations. The facilities were accessible during the surveillance. The evaluators found field conditions to be in compliance with regulations.

Documentation Reviewed for Surveillance:

- 40 Code of Federal Regulations (CFR) 262, Standards Applicable to Generators of Hazardous Waste.
- Washington Administrative Code (WAC) 173-303-200, Accumulating dangerous waste onsite.
- WAC 173-303-340, Preparedness and prevention.
- DOE O 450.1, Environmental Protection Program.

Findings and Observations:

No findings or observations were identified.

ORP Management Debriefed:

The Division Director of ECD was briefed after the surveillance.

Surveillance Conformance Summary:

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
	WAC 173-303-200	Each container is labeled or marked clearly with the	Building 4734C (400 Area Fleet Maintenance) contained a 55-gallon

Surveillance for the DST Dangerous Waste Management Program

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
<p>Hazardous Waste Containers</p>		<p>words “dangerous waste” or “hazardous waste.” Each container must also be marked with a label or sign which identifies the major risk(s) associated with the waste in the container.</p>	<p>drum that was properly labeled (Figures 1 & 2) [Note: nearby a compressor grease leak was noted and cleaned-up]; HS-0079 (400 Area 90-Day Storage Area) containers were properly labeled (See Figures 3 & 4); Building 2711-EA (200 East Area Vehicle Maintenance) containers were properly labeled (see Figures 5, 6, and 7); Building 2711-E containers were properly labeled (see Figure 9); Building HS-034 (200 East 90-Day Storage Area) had properly labeled containers (see Figures 14, 15, and 16).</p>
		<p>When 55 gallons of dangerous waste is accumulated, the container(s) must be marked immediately with the accumulation date and moved within three days to a designated storage or accumulation area.</p>	<p>90-day storage areas in 400 Area and 200 East Area had containers were properly labeled with accumulation dates not exceeding the 90-day limit (see Figures 2, 4, 7, 9, 15, and 16).</p>
		<p>Satellite accumulation area is secure.</p>	<p>Satellite Accumulation Areas in Buildings 4734-C, 2711-EA, and 2711-E (see Figures 2, 7, and 9) were well maintained.</p>
		<p>All facilities must be equipped with fire extinguishers, spill control equipment, and decontamination equipment.</p>	<p>All inspected safety equipment were present and properly maintained.</p>

Surveillance for the DST Dangerous Waste Management Program

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
	WAC 173-303-340	Containers are closed.	All containers were secure (see Figures 2, 4, 7, 9, 15, and 16). [Note: Container in the Flammable Cabinet outside Building 2711-E had leaked. Personnel were notified to remove the container (see Figure 13)]
	40 CFR Part 262	Site has secondary containment around the hazardous waste storage area.	Hazardous waste containers were stored with secondary containment (see Figures 11).
Environmental Protection Program	DOE O 450.1	Operate a vehicle fleet that is the most environmentally preferable possible: Utilize re-refined oil, retread truck tires, antifreeze/engine coolant recyclers, water recycling/reclamation vehicle wash facilities, and bio-based lubricants, fuels and degreasers/cleaners.	The Vehicle Maintenance Building in the 200 East Area (2711-E) recycles batteries, used oil, and spent antifreeze (see Figures 8, 11, and 12); Les Schwab collects and recycles used tires and batteries; retread tires are also used (see Figure 10)..

Appendix A - Surveillance Photos

Figure 1
Building 4734C – Fleet Maintenance



Appendix A (continued)

Figure 2
Building 4734C – Drum



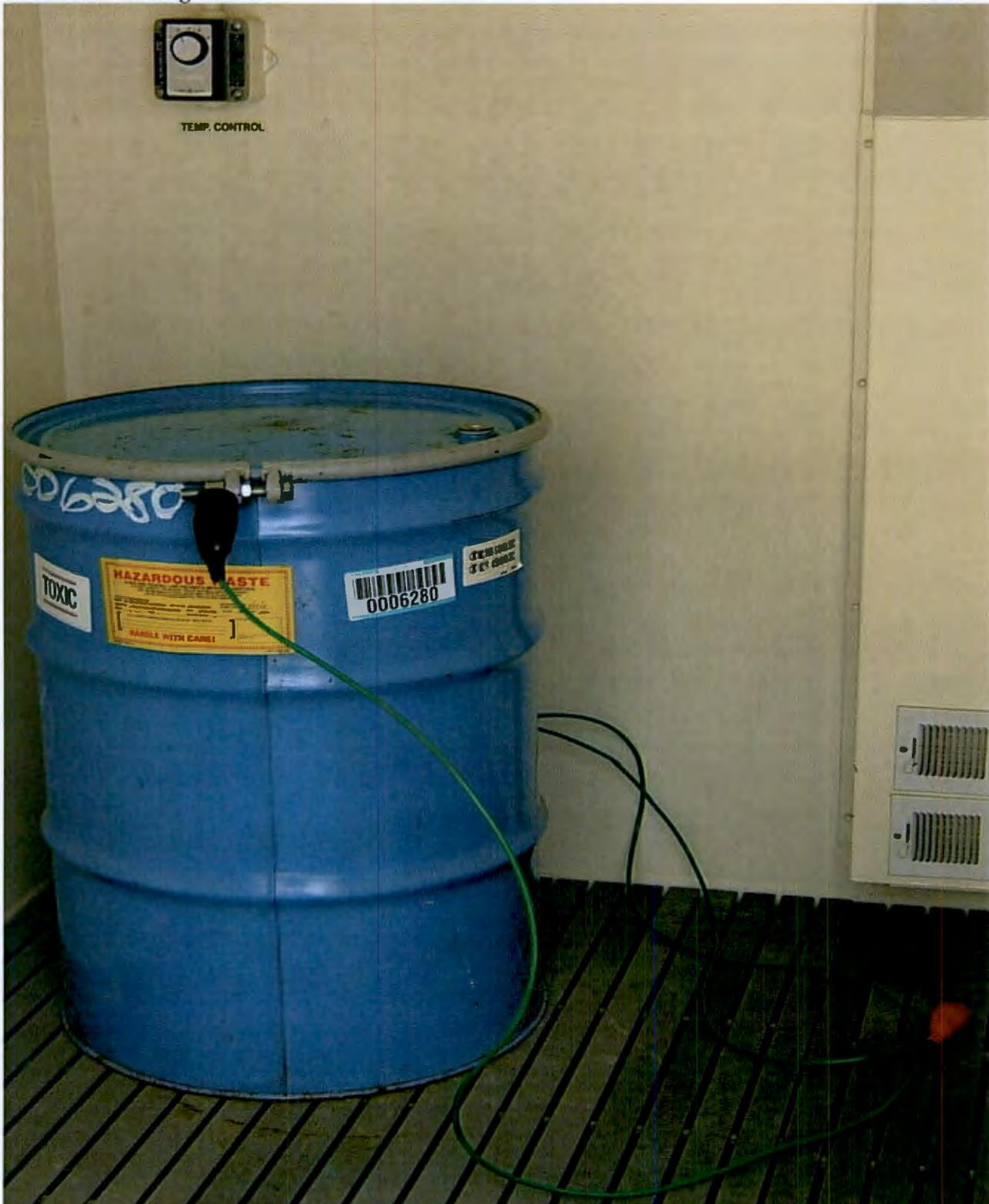
Appendix A (continued)

Figure 3
HS-0079 – 90 Day Storage Area



Appendix A (continued)

Figure 4
HS-0079 Building – Drum



Appendix A (continued)

Figure 5
Building 2711 E- 200 East Vehicle Maintenance



Appendix A (continued)

Figure 6
Building 2711-EA



Appendix A (continued)

Figure 7
Building 2711-EA – Drum



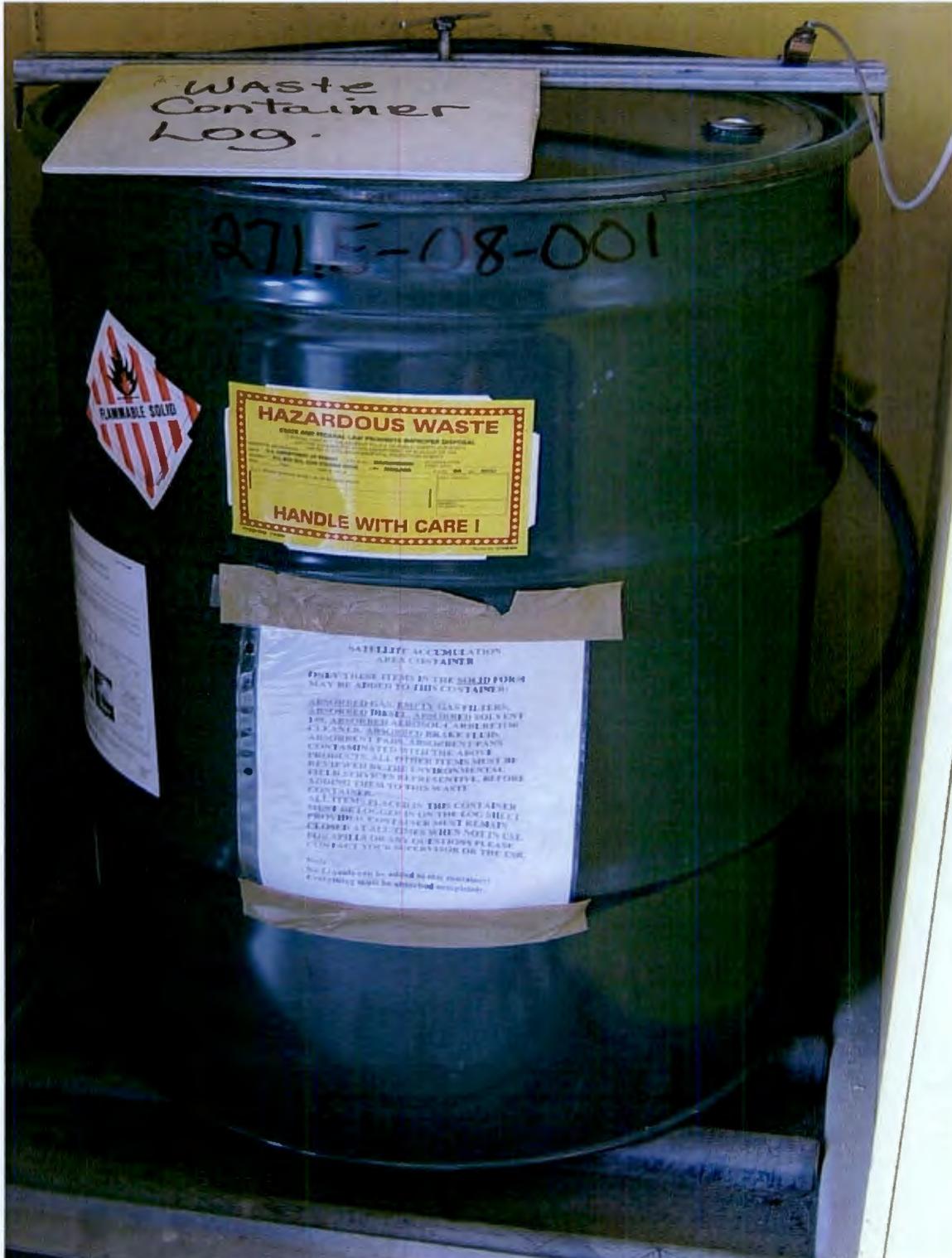
Appendix A (continued)

Figure 8
Outside Building 2711-EA – Battery Storage



Appendix A (continued)

Figure 9
Building 2711-E - Drum



Appendix A (continued)

Figure 10
Outside Building 2711-E – Retread Tires



Appendix A (continued)

Figure 11
Outside Building 2711-E – Spent Antifreeze Drums



Appendix A (continued)

Figure 12
Outside Building 2711-E – Used Oil Drums



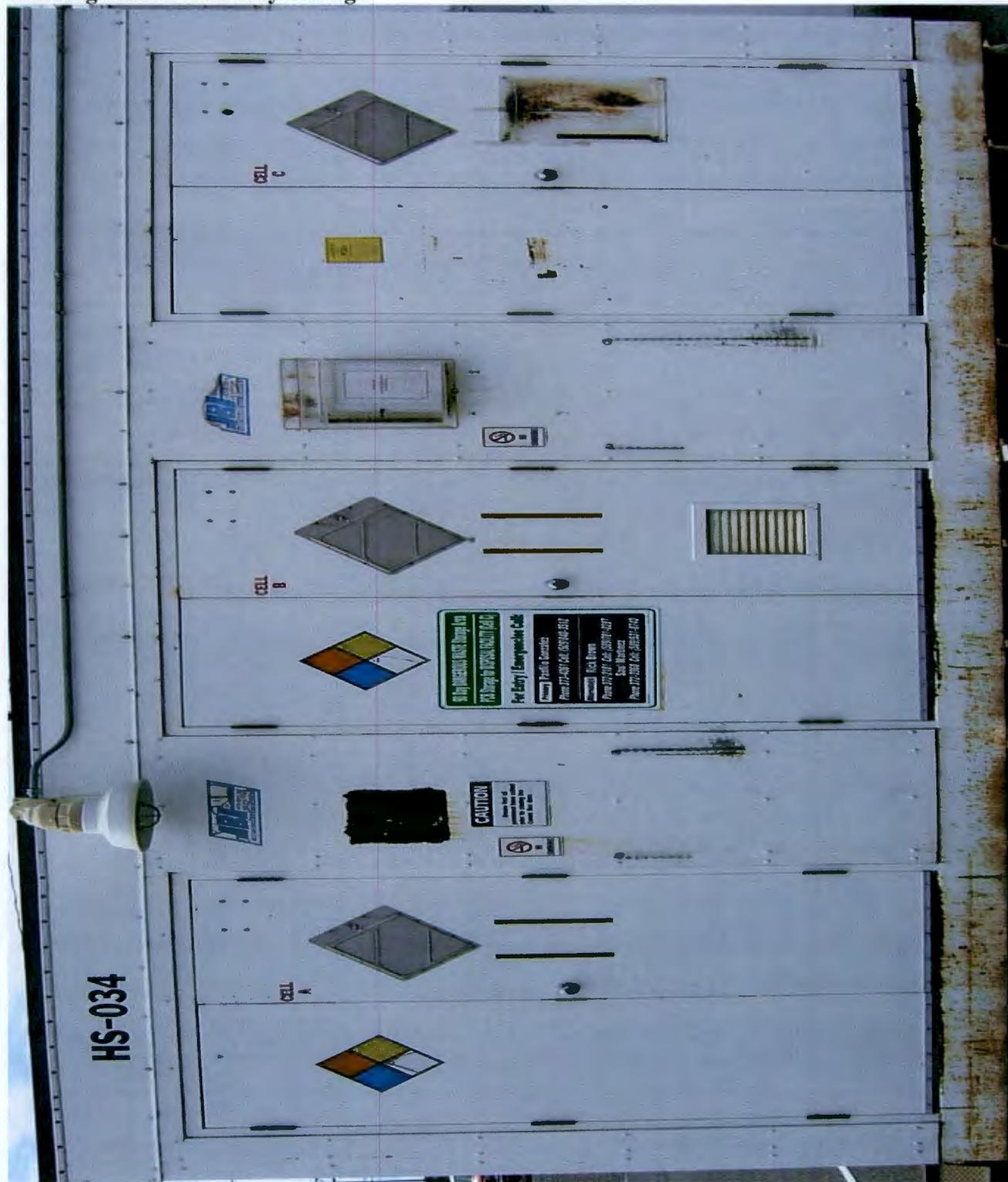
Appendix A (continued)

Figure 13
Outside Building 2711-E – Flammable Cabinet



Appendix A (continued)

Figure 14
Building HS-034 – 90-Day Storage



Appendix A (continued)

Figure 15
Building HS-034 – Room A Drums



Appendix A (continued)

Figure 16
Building HS-034 – Room B Drums



Surveillance for the DST Dangerous Waste Management Program

Signature

Tom Neath

06/18/2008

Gae M. Neath
Surveillance Team Lead

Date