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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

95-PCA-311

JUN 02 1995

Mr. David L. Lundstrom
Section Manager
200 Areas
Nuclear Waste Program
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Dear Mr. Lundstrom:

NOTICE OF INTENT FOR EXPANSION UNDER INTERIM STATUS FOR THE HANFORD FACILITY,
222-S LABORATORY COMPLEX (WA7890008967) (TSD: TS-2-1)

In accordance with Washington Administrative Code (WAC) 173-303-281, the U.S. Department of Energy, Richland Operations Office (RL) and Westinghouse Hanford Company (WHC) are submitting the enclosed Notice of Intent (NOI) for Expansion Under Interim Status for the Hanford Facility, 222-S Laboratory Complex (222-S). The 222-S will be expanded to (1) increase the process design capacity for tank storage to address the addition of a new mixed waste storage tank and (2) increase the process design capacity for container storage to allow for the increased amount of mixed/dangerous waste storage containers that will be stored at the 222-S. The specific information required under WAC 173-303-281 for expansion under interim status is provided in the NOI.

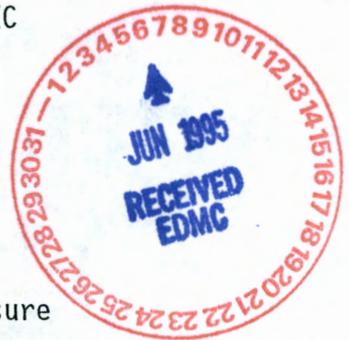
Should you have any questions regarding the NOI, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Mr. R. C. Bowman of WHC on (509) 376-4876.

Sincerely,

James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company

EAP:CEC



Enclosure

- cc w/enc1:
- EDMC, H6-08
- R. Bowman, WHC
- W. Dixon, WHC
- D. Duncan, EPA
- M. Jaraysi, Ecology

- R. Jim, YIN
- D. Powaukee, NPT
- S. Price, WHC
- J. Wilkinson, CTUIR

00-1333

Department of Energy

1011 First Executive Office
P.O. Box 980
Federal Building
Washington, D.C. 20540

95-PCA-211

95-PCA-211

Mr. David L. Lundstrom
Section Manager
EOR Areas
Nuclear Waste Program
Department of Energy
1115 West Fourth Avenue
Kamowitz, Washington 98118

Dear Mr. Lundstrom:

NOTICE OF INTENT FOR EXPANSION UNDER INTERIM STATUS FOR THE BAW-ONE FACILITY,
125-2 LABORATORY COMPLEX (WATERBURY), (EOL-12-2-1)

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In accordance with the...
U.S. Department of Energy...
Nuclear Waste Program...
Department of Energy...
1115 West Fourth Avenue...
Kamowitz, Washington 98118

Enclosed you will find...
Mr. T. D. ...
on page 100-101.

[Faint signatures and text, possibly from a previous page or a related document]



1. Mr. ...
2. Mr. ...
3. Mr. ...

1. Mr. ...
2. Mr. ...
3. Mr. ...

9513381.0482

**NOTICE OF INTENT
FOR EXPANSION UNDER
INTERIM STATUS**

**HANFORD FACILITY,
222-S LABORATORY COMPLEX**



**U.S. DEPARTMENT OF ENERGY,
RICHLAND OPERATIONS OFFICE
MAY 1995**

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METRIC CONVERSION CHART

The following conversion chart is provided to the reader as a tool to aid in conversion.

Into metric units

Out of metric units

If you know	Multiply by	To get	If you know	Multiply by	To get
Length			Length		
inches	25.40	millimeters	millimeters	0.0393	inches
inches	2.54	centimeters	centimeters	0.393	inches
feet	0.3048	meters	meters	3.2808	feet
yards	0.914	meters	meters	1.09	yards
miles	1.609	kilometers	kilometers	0.62	miles
Area			Area		
square inches	6.4516	square centimeters	square centimeters	0.155	square inches
square feet	0.092	square meters	square meters	10.7639	square feet
square yards	0.836	square meters	square meters	1.20	square yards
square miles	2.59	square kilometers	square kilometers	0.39	square miles
acres	0.404	hectares	hectares	2.471	acres
Mass (weight)			Mass (weight)		
ounces	28.35	grams	grams	0.0352	ounces
pounds	0.453	kilograms	kilograms	2.2046	pounds
short ton	0.907	metric ton	metric ton	1.10	short ton
Volume			Volume		
fluid ounces	29.57	milliliters	milliliters	0.03	fluid ounces
quarts	0.95	liters	liters	1.057	quarts
gallons	3.79	liters	liters	0.26	gallons
cubic feet	0.03	cubic meters	cubic meters	35.3147	cubic feet
cubic yards	0.76	cubic meters	cubic meters	1.308	cubic yards
Temperature			Temperature		
Fahrenheit	subtract 32 then multiply by 5/9ths	Celsius	Celsius	multiply by 9/5ths, then add 32	Fahrenheit

Source: *Engineering Unit Conversions*, M. R. Lindeburg, PE., Second Ed., 1990, Professional Publications, Inc., Belmont, California.

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1.0 INTRODUCTION

1
2
3
4 The Washington State Department of Ecology (Ecology) *Dangerous Waste*
5 *Regulations*, Washington Administrative Code (WAC) 173-303-281, require that
6 dangerous waste facility owners and/or operators submit a Notice of Intent
7 (NOI) before submittal of a permit application for new or expanded dangerous
8 waste treatment, storage, and/or disposal (TSD) units. The following
9 information for this NOI is being filed with Ecology by the U.S. Department of
10 Energy, Richland Operations Office (DOE-RL), the owner and operator.

11
12 This document is to serve notice of the intent to expand the tank and
13 container storage capacity of the 222-S Laboratory Complex (222-S Complex)
14 located in the 200 West Area of the Hanford Facility, Richland, Washington.

15
16 The ability to store mixed waste in tanks and containers is being added
17 to ensure compliance with the greater-than-90-day accumulation requirements of
18 WAC 173-303 and the *Resource Conservation and Recovery Act (RCRA) of 1976*, as
19 amended.

20
21 The following identifies the owner and operator of the Hanford Facility
22 and the primary contact:

23
24 **Owner and Operator:** U.S. Department of Energy, Richland Operations Office

25
26 **Manager, Richland Operations Office:** Mr. John D. Wagoner

27
28 **Richland Operations Office Contact:** Mr. James E. Rasmussen

29
30 **Address:** U.S. Department of Energy
31 Richland Operations Office
32 Post Office Box 550
33 Richland, Washington 99352

34
35 **Telephone:** (509) 376-5441
36
37
38

2.0 FACILITY DESCRIPTION AND GENERAL PROVISIONS

39
40
41
42 The Hanford Facility is a single RCRA facility identified by the
43 U.S. Environmental Protection Agency (EPA)/State Identification Number
44 WA7890008967 that consists of over 60 TSD units conducting dangerous waste
45 management activities. These TSD units are included in the *Hanford Facility*
46 *Dangerous Waste Part A Permit Application* (DOE-RL 1988). The Hanford Facility
47 consists of all contiguous land, and structures, other appurtenances, and
48 improvements on the land, used for recycling, reusing, reclaiming,
49 transferring, storing, treating, or disposing of dangerous waste, which, for
50 the purposes of the RCRA, are owned by the U.S. Government and operated by the
51 DOE-RL, excluding land owned by Washington State.

1 The following sections provide a description of the 222-S Complex, along
2 with other general provisions specified in WAC 173-303-281.
3
4

5 2.1 LOCATION OF PROPOSED EXPANSION 6

7 The 222-S Complex is located in the 200 West Area of the Hanford
8 Facility, Benton County, Washington. Small-scale maps depicting the Hanford
9 Facility and the location of the 222-S Complex are provided in Figures 1, 2,
10 and 3. Large-scale maps and a topographic map, which meet the 2.54-centimeter
11 equals-not-more-than-61-meters requirement, are provided in Appendix A and
12 include the following:
13

- 14 • General Overview of Hanford Site (H-6-958)
- 15
- 16 • Topographic map of the 222-S Complex (H-13-000006), including
17 surrounding 305 meters. There are no existing or planned injection or
18 withdrawal wells in the vicinity of the 222-S Complex. There are no
19 barriers planned for drainage or flood control at the 222-S Complex.
20
21

22 2.2 DESCRIPTION OF UNITS TO BE EXPANDED 23

24 The 222-S Complex, which is located in the southeastern corner of the
25 200 West Area, provides analytical chemistry services in support of the
26 Hanford Facility treatment, storage, and/or disposal (TSD) units with emphasis
27 on waste management and environmental restoration programs. The 222-S Complex
28 consists of a main laboratory building, several auxiliary buildings, and two
29 TSD units, the 219-S Waste Handling Facility and the 222-S Dangerous and Mixed
30 Waste Storage Area.
31

32 The 219-S Waste Handling Facility is located northeast of the
33 222-S Analytical Laboratory Building (Figure 3). The 219-S Waste Handling
34 Facility contains three stainless steel tanks: 101 (15,000 liters),
35 102 (15,000 liters), and 103 (5,700 liters) located in two belowgrade concrete
36 cells (Figure 4). Tanks 101 and 103 are used for primary and backup storage
37 of mixed waste from the 222-S Analytical Laboratory. The liquid mixed waste
38 is transferred from tanks 101 and 103 to tank 102 for treatment and storage
39 before transfer to the Double-Shell Tank System. The mixed waste is treated
40 in tank 102 with sodium hydroxide (NaOH) to a pH greater than or equal to 12.0
41 and with sodium nitrite (NaNO₂) to a concentration of 600 parts per million.
42 This treatment process makes the mixed waste more amenable for storage in the
43 Double-Shell Tank System.
44

45 The 222-S Dangerous and Mixed Waste Storage Area consists of two metal
46 storage structures resting on a concrete pad located north of the
47 222-S Analytical Laboratory Building (Figure 3). These metal structures are
48 used for the storage of U.S. Department of Transportation-approved containers
49 holding mixed waste and nonradioactive dangerous waste. The containers are
50 stored until the containers are transferred to the Central Waste Complex

1 (mixed waste) or the 616 Nonradioactive Dangerous Waste Storage Facility
2 (nonradioactive dangerous waste) for storage.

3
4 The type of liquid mixed waste that is stored and treated before transfer
5 to the Double-Shell Tank System consists of characteristic waste, toxic
6 constituents, state-only waste, spent halogenated and nonhalogenated solvent
7 waste, and multi-source leachate from nonspecific source wastes. The
8 estimated annual quantity of liquid mixed waste for tank storage is
9 17,726 kilograms.

10
11 The contents of the containers stored at the 222-S Dangerous and Mixed
12 Waste Storage Area are identified through process knowledge and sample
13 results. The containers hold characteristic waste, toxic constituents, spent
14 halogenated and nonhalogenated solvent waste, nonspecific source waste,
15 discarded polychlorinated biphenyls, and state-only waste. The estimated
16 annual quantity of mixed waste for container storage is 340 kilograms.

17 18 19 **2.3 DESCRIPTION OF EXPANSION OF STORAGE CAPACITY AT THE** 20 **219-S WASTE HANDLING FACILITY AND THE 222-S DANGEROUS** 21 **AND MIXED WASTE STORAGE AREA**

22
23 The 219-S Waste Handling Facility is being upgraded to bring the
24 dangerous waste containment system in compliance with WAC 173-303-640. This
25 upgrade will provide secondary containment for all tanks and piping systems.
26 Tanks 101 and 102 will be removed and reinstalled after installation of
27 secondary containment in Cell A. Tank 103 will be isolated in-place and
28 replaced with a new tank, tank 104, which will be installed in the spare vault
29 (Figure 4). Tank 104 will have a greater storage capacity (7,200 liters) than
30 the existing tank 103 (5,700 liters).

31
32 As a result of the installation of tank 104, the process design capacity
33 for the storage of liquid mixed waste at the 219-S Waste Handling Facility
34 will be expanded by 1,500 liters. The total process design capacity for the
35 storage of liquid mixed waste in the 219-S Waste Handling Facility will be
36 37,000 liters.

37
38 The 222-S Dangerous and Mixed Waste Storage Area is being upgraded to
39 bring this area into compliance with applicable fire codes. This upgrade will
40 replace the two existing storage structures with two new RCRA-qualified
41 storage structures that are configured to comply with WAC 173-303 and fire
42 codes. Although the new storage structures will be smaller than the existing
43 structures, the storage capacity of the 222-S Dangerous and Mixed Waste
44 Storage Area will increase because some of the various sized containers can be
45 stacked in the new storage structures. Currently, containers are stored only
46 in a single layer.

47
48 As a result of stacking containers in the new storage structures, the
49 process design capacity for storage of waste at the 222-S Dangerous and Mixed
50 Waste Storage Area will be increased by 1,700 liters. The total process

1 design capacity for storage of waste at the 222-S Dangerous and Mixed Waste
2 Storage Area will be 3,700 liters.

3 4 **2.4 COMPLIANCE WITH STATE ENVIRONMENTAL POLICY ACT**

5
6 The *State Environmental Policy Act of 1971* Environmental Checklist was
7 submitted November 1991 with the NOI for the 222-S Complex. Supplement 1
8 (Appendix B) provides information pertaining to the new storage tank and new
9 storage structures.

10 11 **2.5 COMPLIANCE WITH SITING STANDARDS**

12
13 Demonstration of compliance with the siting criteria as required under
14 WAC 173-303-282(6) and (7) are addressed in the following sections.

15 16 17 **2.5.1 Criteria for Elements of the Natural Environment**

18
19 The following section addresses measures in place at the 222-S Complex to
20 provide protection of the natural environment. Each element of the criteria
21 identified in WAC 173-303-282(6) is addressed.

22
23 **2.5.1.1 Earth.** This section addresses the potential for the release of
24 dangerous waste into the environment because of structural damage resulting
25 from conditions of the earth at the 222-S Complex.

26
27 **2.5.1.1.1 Seismic Risk.** The 222-S Complex is located in Benton County,
28 Washington, and has been identified as being in Zone 2B in accordance with the
29 *Uniform Building Code* (ICBO 1991). The 219-S Waste Handling Facility has been
30 reviewed for seismic considerations as detailed in the *219-S Aqueous Waste*
31 *Disposal Facility Tank System Integrity Assessment Report* (WHC 1990). The
32 integrity report stated that the storage tanks and vault structure are
33 adequate to resist a seismic event as defined in the *Hanford Plant Standards,*
34 *Standard Design Criteria - 4.1* (KEH 1993). This plant standard provides
35 seismic load criteria specific for the Hanford Facility.

36
37 No active faults, or evidence of a fault that has had displacement during
38 Holocene times, have been found on the Hanford Site (DOE 1988; WHC 1991). The
39 youngest faults recognized at the Hanford Site occur on Gable Mountain, over
40 12.1 kilometers northeast of the 200 West Area. These faults are of
41 Quaternary age and are considered 'capable' by the Nuclear Regulatory
42 Commission (NRC 1982).

43
44 **2.5.1.1.2 Subsidence.** The 222-S Complex is located in the 200 West Area
45 of the Hanford Facility. This area of the Hanford Facility is not considered
46 an area subject to subsidence (PNL 1992).

47
48 **2.5.1.1.3 Slope or Soil Instability.** The 222-S Complex is not located
49 in an area of slope or soil instability, or is it in an area affected by
50 unstable slope or soil conditions (PNL 1992).

51

1 2.5.1.2 Air. The 222-S Complex is not an incineration unit. Discussion of
2 measures taken to reduce air emissions resulting from incineration is not
3 applicable.

4
5 2.5.1.3 Water. This section addresses the potential for contaminating the
6 waters of Washington State in the event of a release of mixed and/or dangerous
7 waste.

8
9 2.5.1.3.1 Surface Water. The following addresses considerations for the
10 protection of surface water.

11
12 2.5.1.3.1.1 Flood, Seiche, and Tsunami Protection. Three sources of
13 potential flooding of the area were considered: (1) the Columbia River,
14 (2) the Yakima River, and (3) storm-induced run-off in ephemeral streams
15 draining the Hanford Facility. No perennial streams occur in the central part
16 of the Hanford Facility. The 222-S Complex location is not within the 100- or
17 500-year floodplain (ERDA 1976).

18
19 2.5.1.3.1.2 Perennial Surface Water Bodies. The 222-S Complex is a
20 nonland-based facility as defined in WAC 173-303-282(3)(i). The
21 WAC 173-303-282(6)(c)(i)(B)(I) requires nonland-based facilities to be located
22 at least 152 meters from any perennial water body. The 222-S Complex is
23 approximately 9 kilometers from the Columbia River, the closest perennial
24 water body.

25
26 2.5.1.3.1.3 Surface Water Supply. The 222-S Complex is not located
27 within an area designated as a watershed or is it located within 0.4 kilometer
28 of a surface water intake for domestic water.

29
30 2.5.1.3.2 Groundwater. The following addresses consideration for the
31 protection of groundwater. The 222-S Complex is not a land-based facility as
32 defined by WAC 173-303-282(3); therefore, compliance with the contingent
33 groundwater protection program is not required.

34
35 2.5.1.3.2.1 Depth to Groundwater. The 222-S Complex is located in the
36 200 West Area of the Hanford Facility. The depth to groundwater at this
37 location is over 79 meters.

38
39 2.5.1.3.2.2 Sole Source Aquifer. The 222-S Complex is not located over
40 an area designated as a 'sole source aquifer' under section 1424(e) of the
41 *Safe Drinking Water Act of 1974*.

42
43 2.5.1.3.2.3 Groundwater Management Areas and Special Protection Areas.
44 The 222-S Complex is not located in a groundwater management area or a special
45 protection area.

46
47 2.5.1.3.2.4 Groundwater Intakes. The 222-S Complex is not located
48 within 0.4 kilometer of the nearest groundwater intake for domestic water.

49
50 2.5.1.4 Plants and Animals. The following sections address consideration to
51 reduce the potential for mixed waste contaminating plant and animal habitat in

1 the event of a release of mixed waste. The 222-S Complex is over 152 meters
2 from any of the following.

3
4 **2.5.1.4.1 Wetlands.** The 222-S Complex is not located near any wetlands.

5
6 **2.5.1.4.2 Designated Critical Habitat.** The 222-S Complex is not located
7 in an area designated as critical habitat for federally listed threatened or
8 endangered species as defined by the *Endangered Species Act of 1973*.

9
10 **2.5.1.4.3 State Designated Habitat.** The 222-S Complex is not located in
11 an area designated by the Washington State Department of Wildlife as habitat
12 essential to the maintenance or recovery of any state listed threatened or
13 endangered species.

14
15 **2.5.1.4.4 Natural Area Preserves.** The 222-S Complex is not located in
16 any natural area acquired or voluntarily registered or dedicated under
17 Chapter 79.70 Revised Code of Washington.

18
19 **2.5.1.4.5 Wildlife Refuge, Preserve, or Bald Eagle Protection Area.** The
20 222-S Complex is not located in a state or federally designated wildlife
21 refuge, preserve, or bald eagle protection area.

22
23 **2.5.1.5 Precipitation.** The 222-S Complex is not located in an area having a
24 mean annual precipitation level of greater than 254 centimeters (DOE 1987).

25
26
27 **2.5.2 Criteria for Elements of the Built Environment**

28
29 The following sections address the locational factors affecting
30 protection of the built environment. Each element of the criteria for
31 nonland-based facilities or units identified in WAC 173-303-282(7) is
32 addressed.

33
34 **2.5.2.1 Adjacent Land Use.** This section addresses the setback criteria for
35 adjacent land use.

36
37 **Nonland-Based Facilities.** The 222-S Complex is located approximately
38 21 kilometers from the closest Hanford Facility property line.

39
40 **2.5.2.2 Special Land Uses.** This section addresses setback criteria for
41 special land uses.

42
43 **2.5.2.2.1 Wild and Scenic Rivers.** The 222-S Complex is located in the
44 200 West Area approximately 9 kilometers from the Columbia River, which has
45 been proposed as a Wild and Scenic River. The 222-S Complex clearly is not
46 within the viewshed of users of the Columbia River.

47
48 **2.5.2.2.2 Parks, Recreation Areas, National Monuments.** The
49 222-S Complex is situated over 152 meters from the nearest state or federally
50 designated park, recreation area, or national monument.

1 2.5.2.2.3 Wilderness Areas. The 222-S Complex is located approximately
2 152 meters from any Wilderness Areas as defined by the *Wilderness Act of 1964*.
3

4 2.5.2.2.4 Farmland. The 222-S Complex is a minimum of 152 meters from
5 any commercial or private prime farmland.
6

7 2.5.2.3 Residences and Public Gathering Places. This section discusses
8 factors affecting residences and public gathering places. The 222-S Complex
9 is located over 152 meters from residences and public gathering places.
10

11 2.5.2.3.1 Incineration. Incineration is not a process used at the
12 222-S Complex. Therefore, this criterion is not applicable.
13

14 2.5.2.3.2 Land Use Compatibility. The Hanford Facility conforms with
15 local land use zoning designation requirements.
16

17 2.5.2.3.3 Archeological Sites and Historic Sites. No places or objects
18 listed on, or proposed for, national, state, or local preservation registers
19 are known to be on or next to the 222-S Complex. There are no known
20 archaeological, historical, or Native American religious sites on or next to
21 the 222-S Complex.
22
23
24

25 3.0 TEN-YEAR NONCOMPLIANCE HISTORY

26
27
28 Appendix C summarizes Notice of Compliance Violations and the associated
29 responses. This summary and the correspondence associated with notices of
30 compliance violations can be obtained by contacting the following:
31

32 Public Access Room H6-08
33 Westinghouse Hanford Company
34 P.O. Box 1970
35 Richland, Washington 99352
36 (509) 372-3411.
37
38
39

40 4.0 JUSTIFICATION OF NEED

41
42
43 In May 1989, the U.S. Department of Energy along with Ecology and the EPA
44 formally entered into an agreement known as the *Hanford Federal Facility*
45 *Agreement and Consent Order* (Tri-Party Agreement) (Ecology et al. 1994) for
46 the purpose of the Hanford Facility gaining compliance with federal, state,
47 and local laws concerning the management of waste. The operation of
48 222-S Complex supports Tri-Party Agreement milestones by providing quality
49 analytical chemistry services in support of the Hanford Facility reprocessing
50 units with emphasis on waste management and environmental restoration.
51

1 Expansion of the liquid mixed waste storage capacity at the 219-S Waste
2 Handling Facility by replacing tank 103 with tank 104 is necessary to allow
3 the 222-S Complex to comply with the secondary containment requirements of
4 WAC 173-303-640. Expansion of the 222-S Dangerous and Mixed Waste Storage
5 Area is necessary to allow the 222-S Complex to comply with applicable fire
6 codes.
7
8
9

10 **5.0 IMPACT ON OVERALL CAPACITY AT THE HANFORD FACILITY AND**
11 **THE STATE OF WASHINGTON**
12
13

14 The current capacity for the treating, storing, and/or disposing of
15 liquid mixed waste is limited within Washington State and the Hanford
16 Facility. The expansion of storage capacity at the 222-S Complex will allow
17 for treatment and storage of mixed waste and will comply with WAC 173-303
18 regulations on mixed waste. This expansion for storage capacity at the
19 222-S Complex supports Tri-Party Agreement milestones by providing a means to
20 identify dangerous waste constituents and prepare the waste to be treated for
21 transfer within the Hanford Facility.
22
23
24
25

6.0 REFERENCES

- 1
2
3
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5 *High-Level, Transuranic and Tank Wastes*, Vol. 1-5, DOE/EIS-0113,
6 U.S. Department of Energy, Washington, D.C.
7
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10
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12 Vols. 1 through 3, DOE/RL 88-21, U.S. Department of Energy-Richland
13 Operations Office, Richland, Washington.
14
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16 *Order*, Vols. 1 and 2, Washington State Department of Ecology,
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18 Olympia, Washington.
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32 Richland, Washington.
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34 WHC, 1990, *Aqueous Waste Disposal Facility Tank System Integrity Assessment*
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40 WHC-SD-ER-TI-003, Westinghouse Hanford Company, Richland, Washington.

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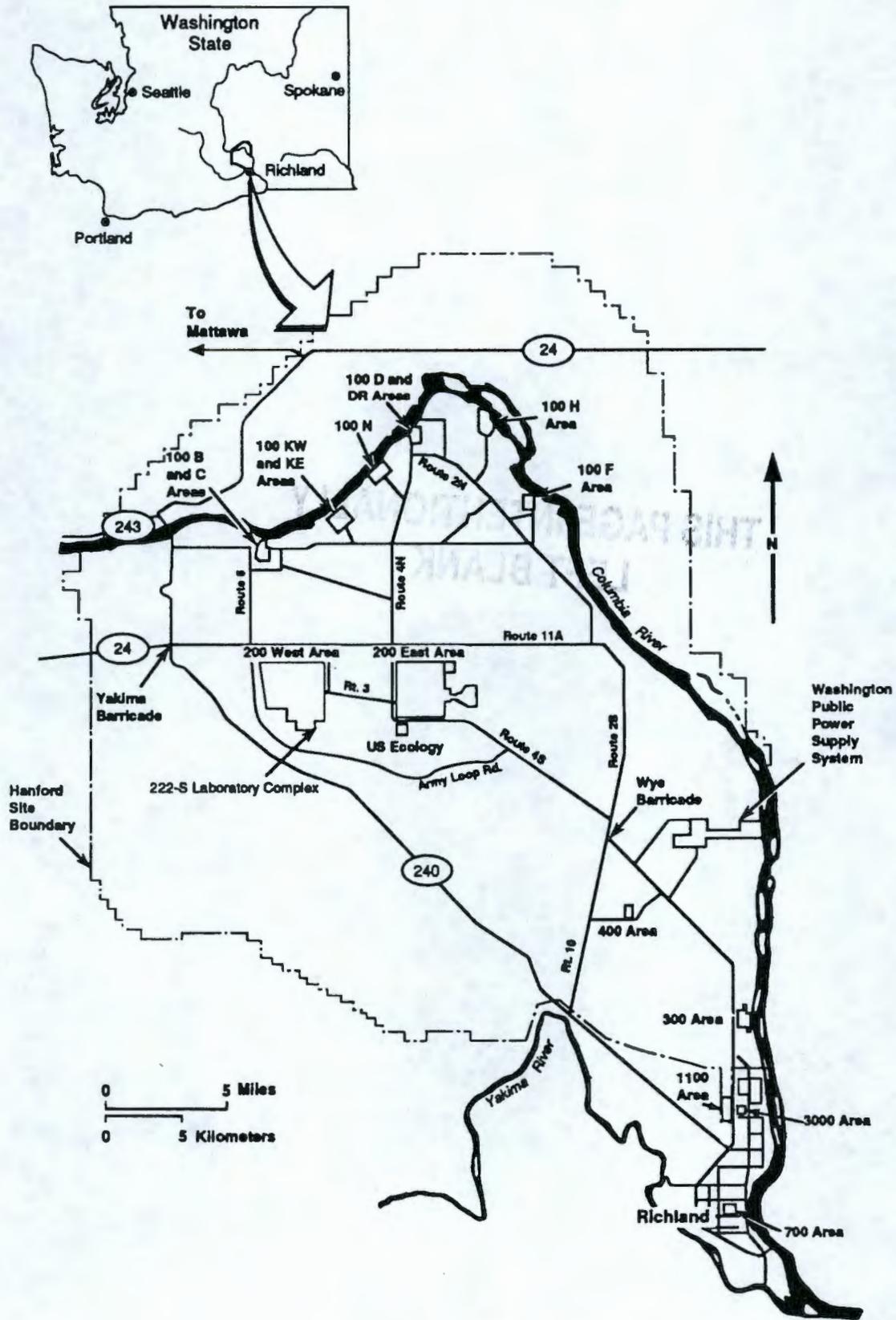
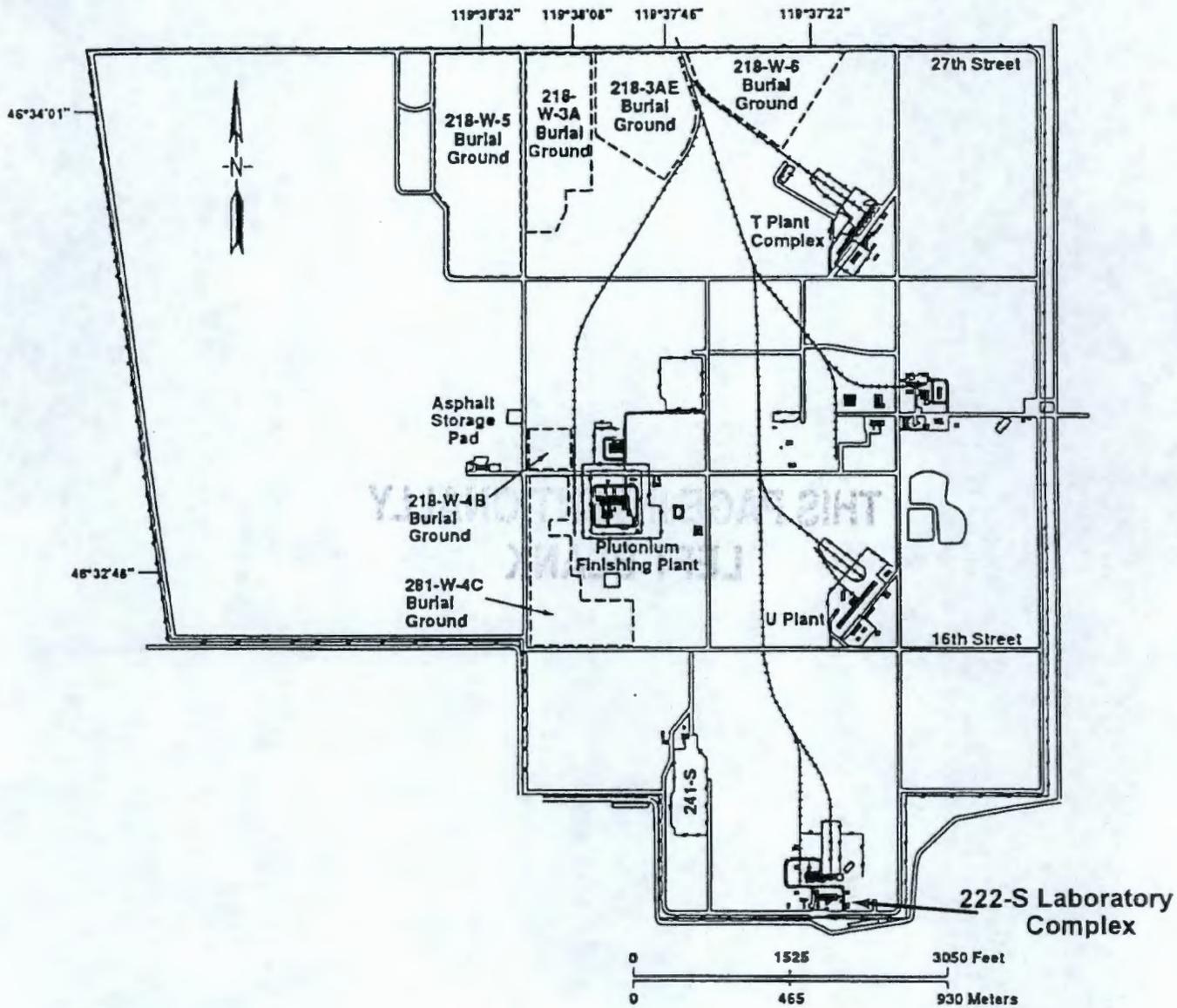


Figure 1. Hanford Facility.

T830623

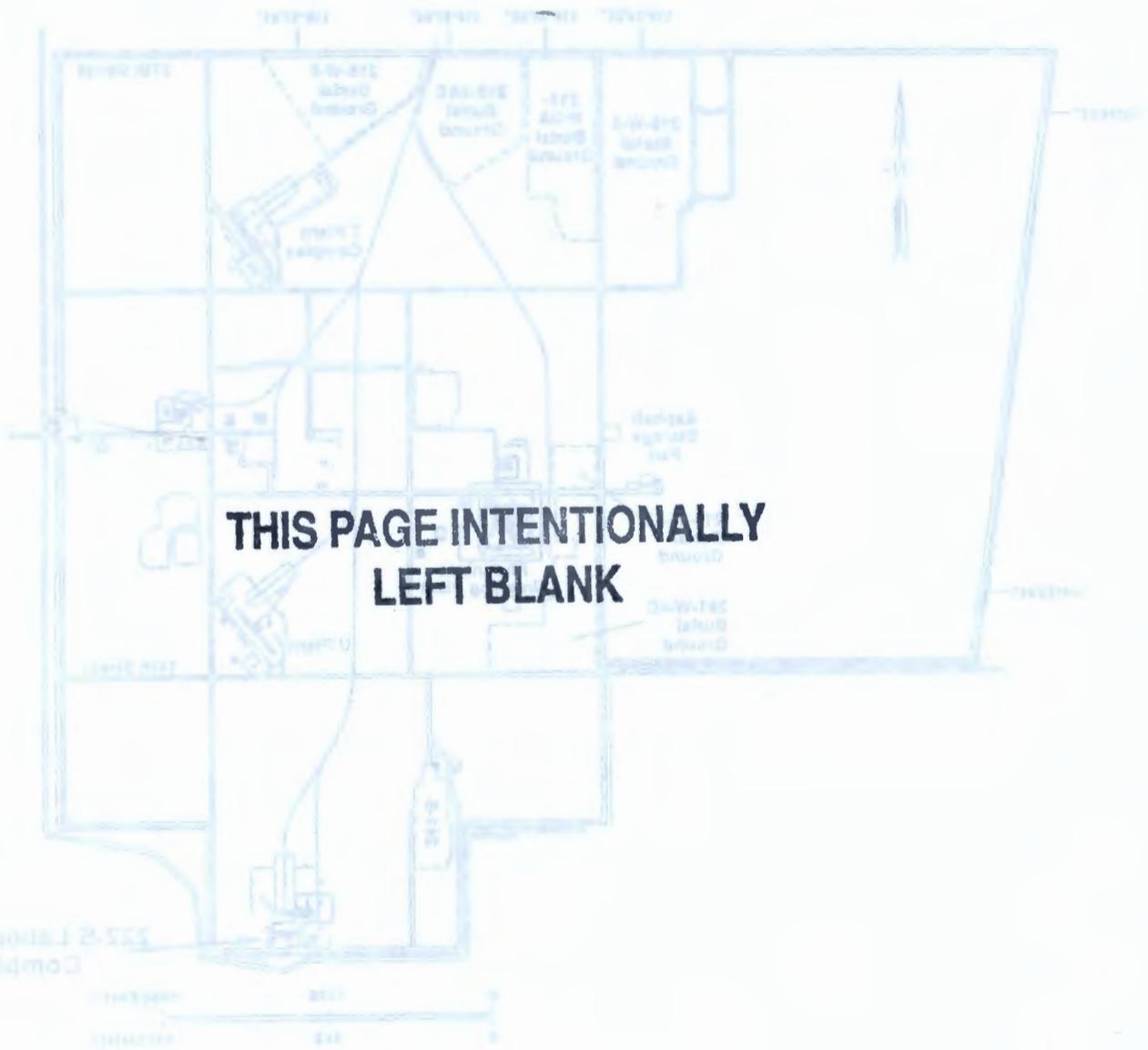
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200 West Area

Figure 2. Location of 222-S Laboratory Complex.

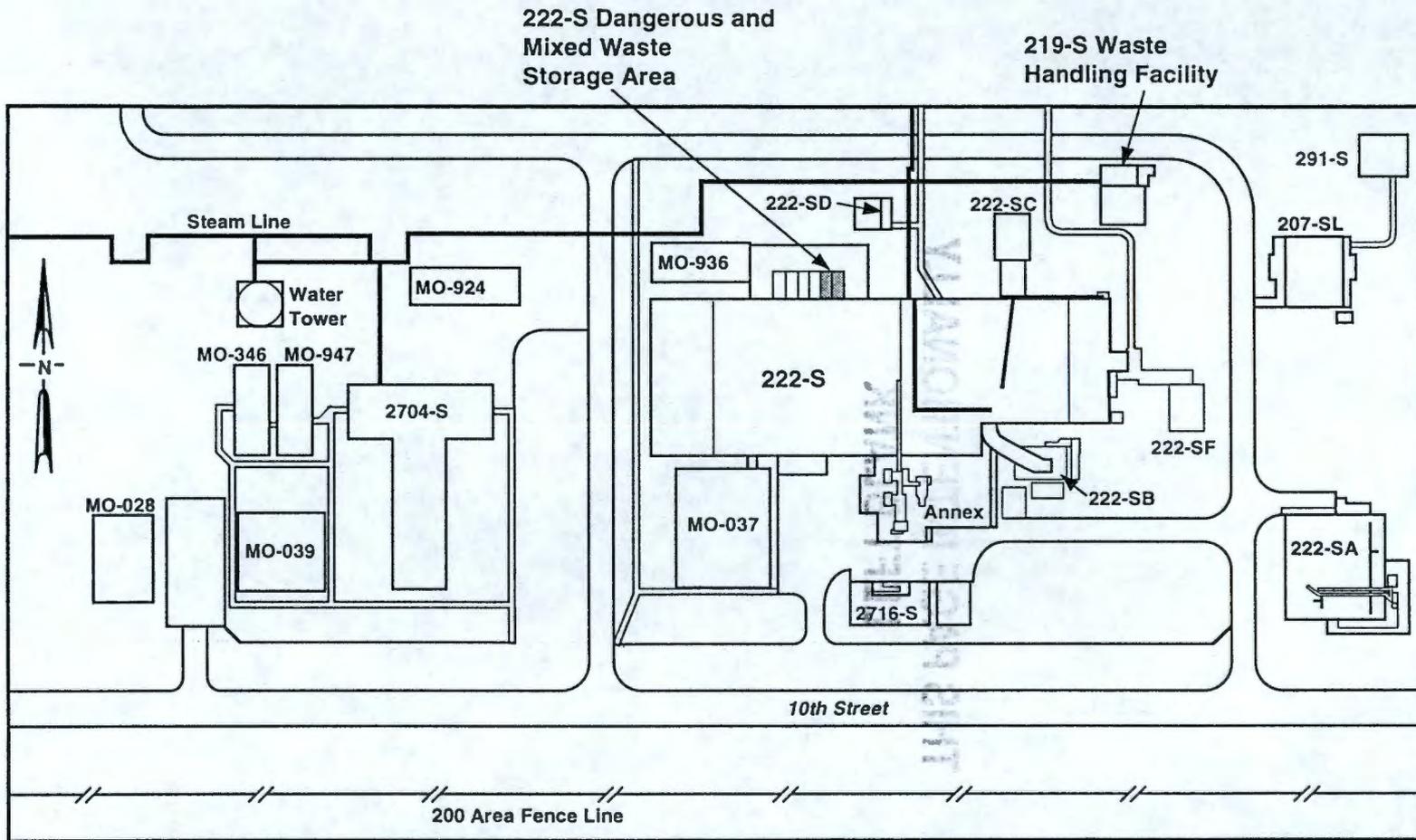


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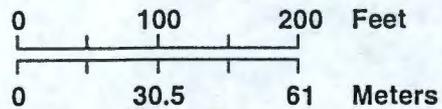
300 West Ave

Figure 5. Location of SSS-2 Laboratory Complex

Figure 3. 222-S Laboratory Complex.

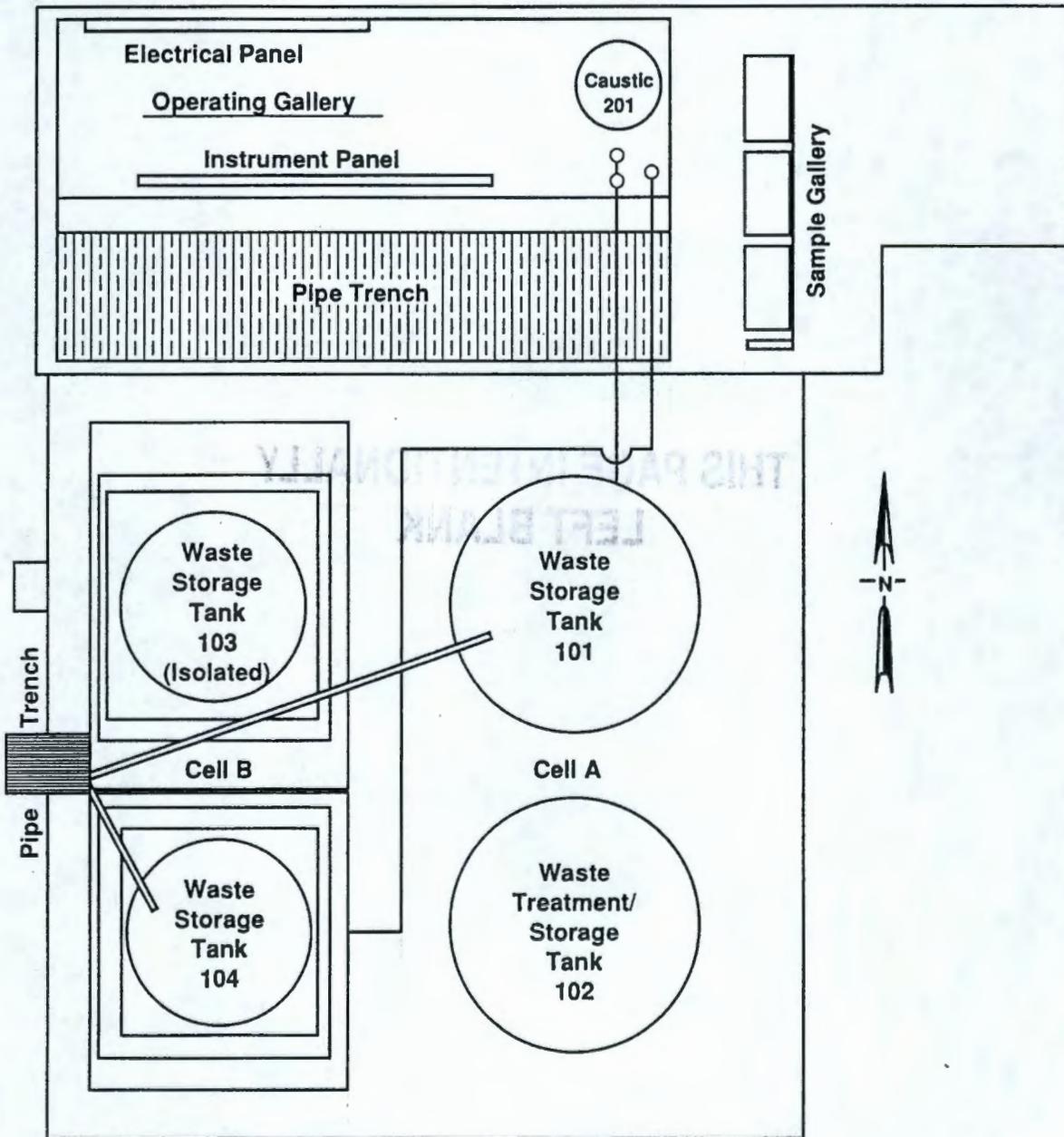


Scale



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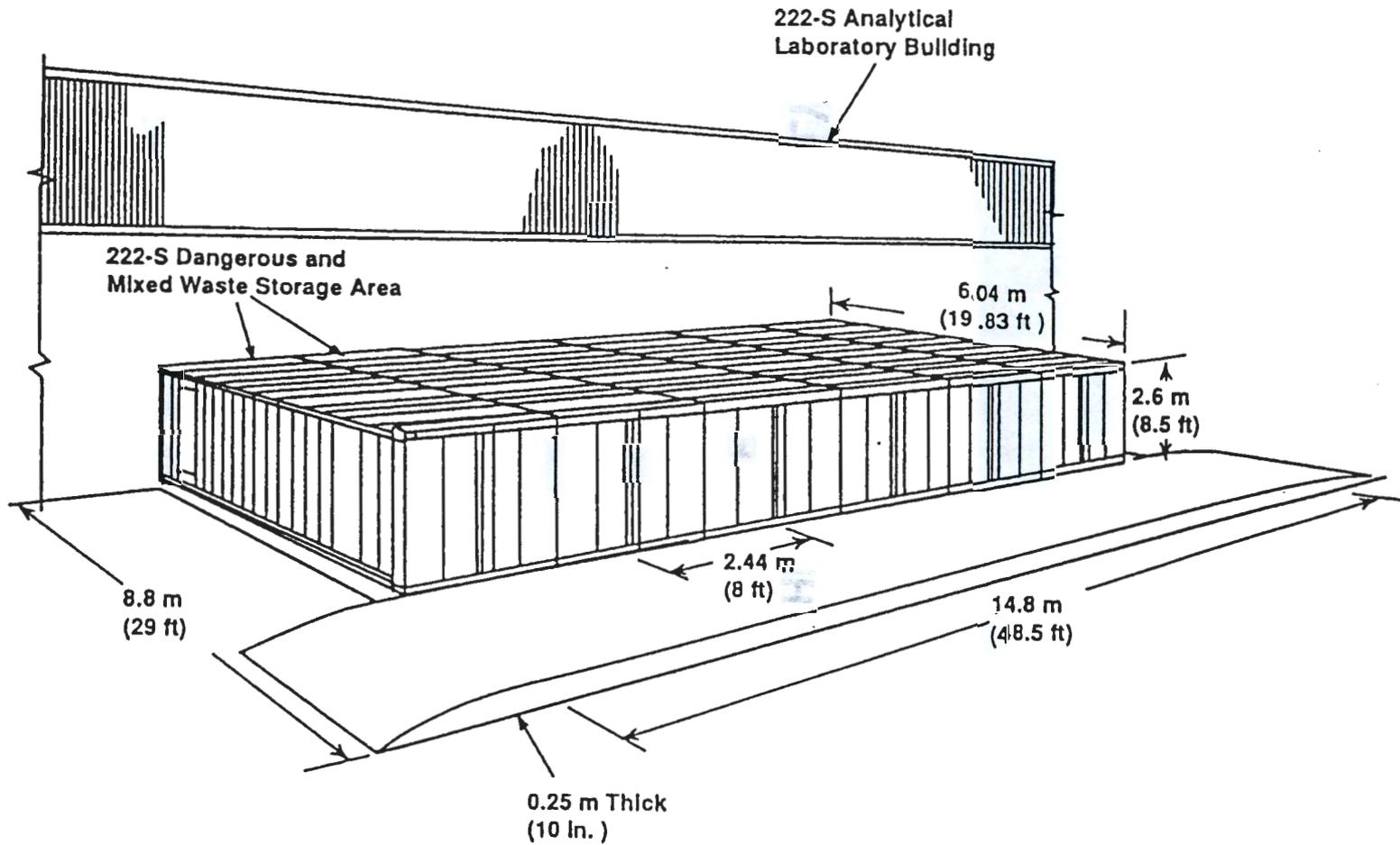
Figure 4. 219-S Waste Handling Facility-Treatment and Storage Tanks.

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222-S Laboratory Complex

Figure 5. 222-S Dangerous and Mixed Waste Storage Area.



222-S Dangerous and Mixed Waste Storage Area

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APPENDICES

- 1
- 2
- 3
- 4 A LOCATION MAPS
- 5
- 6 B STATE ENVIRONMENTAL POLICY ACT ENVIRONMENTAL CHECKLIST
- 7
- 8 C SUMMARY OF NOTICES OF COMPLIANCE VIOLATIONS AND THE
- 9 U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE RESPONSES

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APPENDIX A

LOCATION MAPS

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- H-6-958 General Overview of Hanford Site.
- H-13-000006 Topographic Map 222-S Laboratory Complex.

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NOTES

ON 6-24-89. THE TOPOGRAPHIC MAP WAS PREPARED
ATIONAL MAP ACCURACY STANDARDS.

THE CERTIFICATE ARE LOCATED IN THE WESTINGHOUSE
76 SHEET 1 AND H-2-79477 SHEET 1 THRU 37.
BLOCK OF THE H-13-000201 THROUGH H-13-000237
IPANY.

E PLANE COORDINATE SYSTEM AS DEFINED BY THE
SITE LIES WITHIN THE WASHINGTON COORDINATE SYSTEM,
AND USES X (EASTINGS) AND Y (NORTHINGS) COORDINATES.

ITS INITIAL POINT NORTHEAST OF THE 400 AREA. IT
GENERAL SITE WORK SUCH AS WELLS AND BURIAL GROUNDS

INES THAT TRANSFER WASTE FROM THE 222-S ANALYTICAL
HANDLING FACILITY. THERE ARE TWO 2 INCH UNDERGROUND PIPELINES
RANSFERS WASTE TO THE DOUBLE-SHELL TANK SYSTEM.

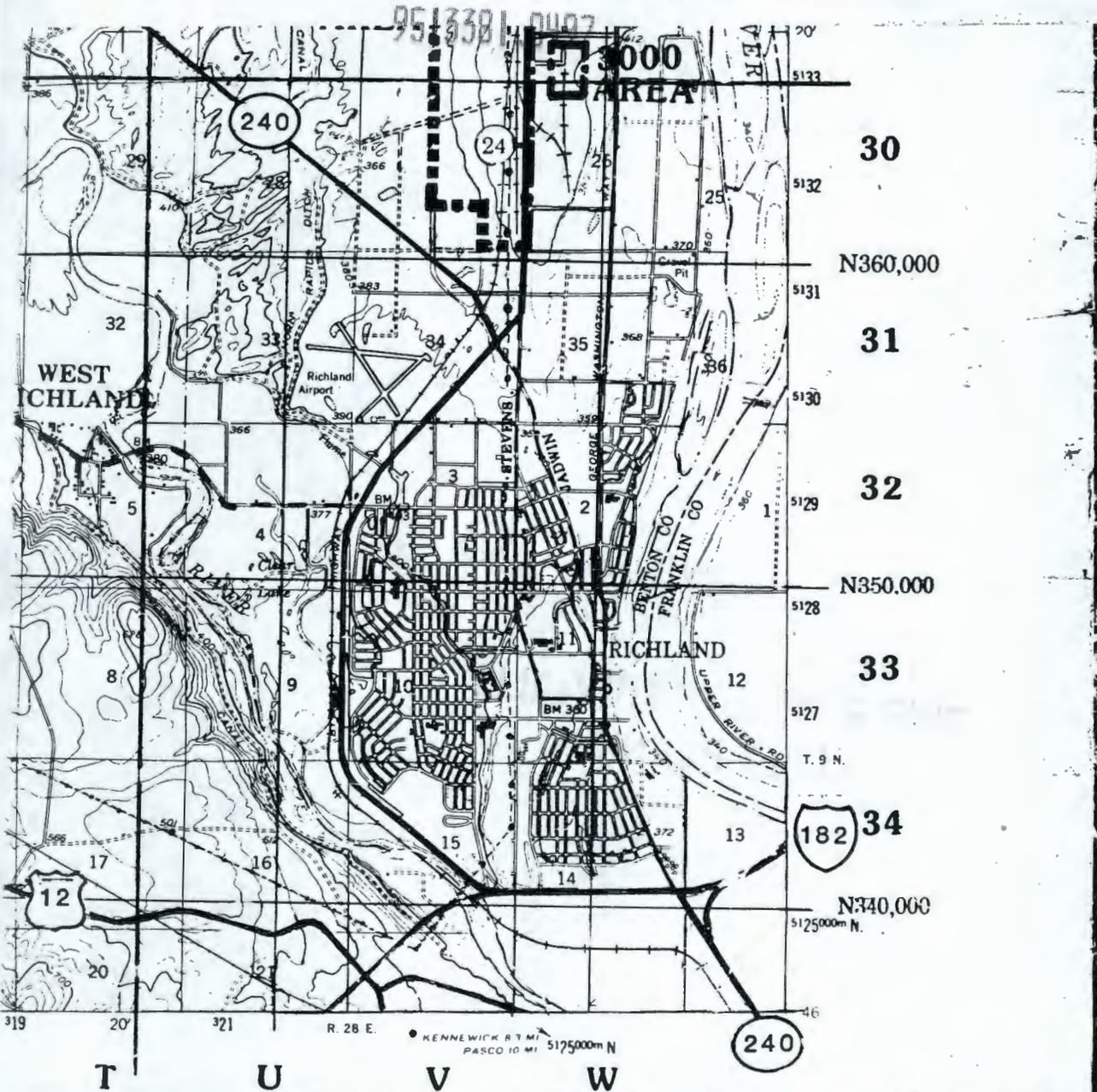
DWG NO H-13-000006 SH 1 of 1 REV 2

JOCE KAMPPI	DATE 5-30-91	U.S. DEPARTMENT OF ENERGY Richland Operations Office Westinghouse Hanford Company				
RY TILLEY	9-16-91					
VE BOOTHROYD	9-17-91					
RRY GOODWIN	9-17-91					
TOPOGRAPHIC MAP 222-S LABORATORY COMPLEX		SIZE	BLDG NO	INDEX NO	DWG NO	REV
		F	222-S	0103	H-13-000006	2
PLEMENTATION		SCALE 1:2000	EDT 145753		SHEET 1 OF 1	

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APPD FOR QUALITY ASSURANCE	
APPD <i>[Signature]</i>	7/27
APPD <i>[Signature]</i>	12/10
APPD	
RESPONSIBLE ENGINEER R. L. MARTELL	2/10
DRAFTING APPD	
CHECKED <i>[Signature]</i>	2/10
DRAWN K. D. JUNT	2/10
CLASSIFICATION NONE	BY NOT REQ'D

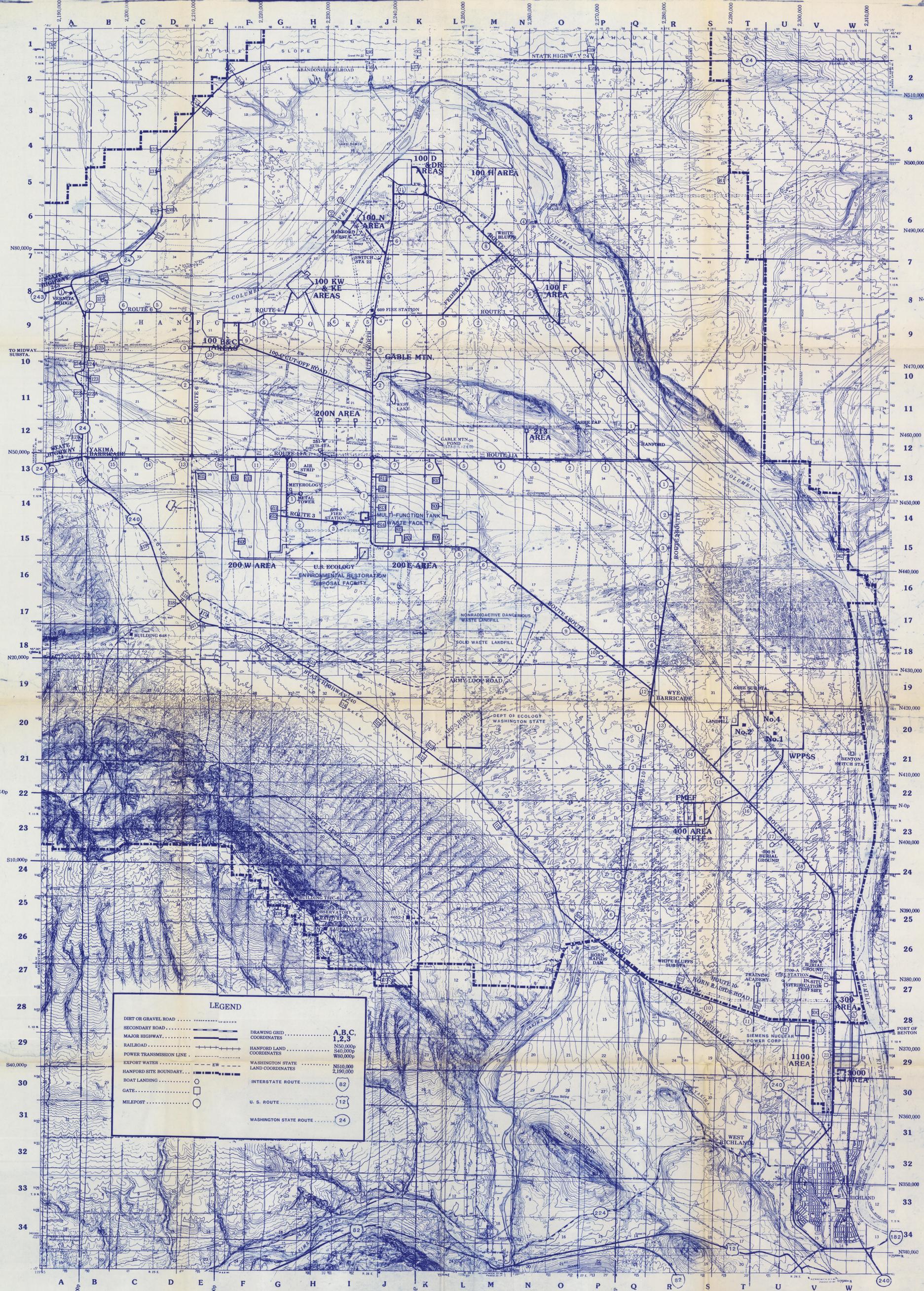
U. S. Department of Energy
Richland Operations Office

 **Westinghouse Hanford Company**

GENERAL OVERVIEW OF HANFORD SITE

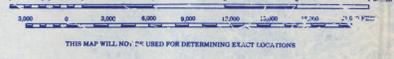
SCALE AS SHOWN	PROJECT NO. 600 GEN	INDEX NO. 0100
DRAWING NO. H-6-958	SHEET NO. 1	SHEETS 1

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LEGEND	
DIKT OR GRAVEL ROAD
SECONDARY ROAD	-----
MAJOR HIGHWAY	=====
RAILROAD	-----
POWER TRANSMISSION LINE	-----
EXPORT WATER	-----
HANFORD SITE BOUNDARY	-----
BOAT LANDING	○
GATE	□
MILEPOST	○
DRAWING GRID COORDINATES	A.B.C. 1.2.3
HANFORD LAND COORDINATES	N50,000p S40,000p W80,000p
WASHINGTON STATE LAND COORDINATES	N510,000 2,190,000
INTERSTATE ROUTE	(82)
U. S. ROUTE	(12)
WASHINGTON STATE ROUTE	(24)

SITE PLAN
CONTOUR INTERVAL IN FEET. DATUM IS MEAN SEA LEVEL.



OFFICIAL RELEASE
BY WWS EST-10111
DATE MAR 17 1999

DRAWING APPROVALS DATE
APPRO FOR QUALITY ASSURANCE

U. S. Department of Energy
Richard Operations Office
Westinghouse Hanford Company

GENERAL OVERVIEW OF HANFORD SITE

RESPONSIBLE ENGINEER
DRAWING APPRO
CHECKED
DATE

AS SHOWN 600 GEN INDEX NO. 0100
H-6-958 SHEET NO. 1 OF 1

NOTE
APPROVAL TO CHANGE THIS MAP MUST BE OBTAINED FROM THE ENVIRONMENTAL DIVISION, RCRA PERMITS SECTION BECAUSE THIS MAP WAS SUBMITTED WITH PERMIT APPLICATIONS TO THE WASHINGTON DEPARTMENT OF ECOLOGY.

NEXT USED ON: EMD ITEM

DRAWING STATUS

9513381.0499

NOI
222-S Laboratory Complex
05/95

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2
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4

APPENDIX B

STATE ENVIRONMENTAL POLICY ACT ENVIRONMENTAL CHECKLIST

1 This environmental checklist covers the entire 222-S Complex.
2 This environmental checklist (Rev. 1) is being submitted concurrently
3 with the *Notice of Intent for Expansion Under Interim Status for the*
4 *222-S Complex* (Rev. 1), in accordance with Washington Administrative
5 Code 173-303-281(3)(a)(v).

9513381.0500

STATE ENVIRONMENTAL POLICY ACT
ENVIRONMENTAL CHECKLIST FORMS

FOR

HANFORD FACILITY,
222-S LABORATORY COMPLEX

YLL
SIR
SUPPLEMENT 1

MAY 1995

WASHINGTON ADMINISTRATIVE CODE
ENVIRONMENTAL CHECKLIST FORMS
[WAC 197-11-960]

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SEPA Checklist
222-S Laboratory Complex
Supplement 1
Page 1 of 191 A. BACKGROUND
23 1. Name of proposed project, if applicable:
4

5 222-S Laboratory Complex. This checklist accompanies a Notice of Intent
6 (NOI) to expand the waste tank storage capacity and provide secondary
7 containment at the 219-S Waste Handling Facility and increase waste
8 container storage capacity at the 222-S Dangerous and Mixed Waste Storage
9 Area. These units are part of the 222-S Laboratory Complex in the
10 200 West Area of the Hanford Facility, Richland, Washington.
11

12 2. Name of applicants:
13

14 U.S. Department of Energy, Richland Operations Office (DOE-RL).
15

16 3. Address and phone number of applicants and contact persons:
17

18 U.S. Department of Energy
19 Richland Operations Office
20 Richland, Washington 99352
21

22 Contact Person:
23

24 J. E. Rasmussen, Division Director
25 Office of Environmental Assurance,
26 Permits, and Policy Division
27 (509) 376-5441
28

29 4. Date checklist prepared:
30

31 May 1995
32

33 5. Agency requesting the checklist:
34

35 Washington State Department of Ecology
36 Kennewick Office
37 1315 W. 4th Avenue
38 Kennewick, WA 99336
39

40 6. Proposed timing or schedule: (including phasing, if applicable):
41

42 The upgrade to the 219-S Waste Handling Facility is scheduled to begin
43 October 1, 1995, and will require about 16 months for completion.
44 Upgrading of the 222-S Dangerous and Mixed Waste Storage Area will begin
45 May 1, 1995, and will require about 30 days to complete.
46

47 7. Do you have any plans for future additions, expansion, or further
48 activity related to or connected with this proposal? If yes, explain.
49

50 No.
51

- 1 8. List any environmental information you know about that has been prepared,
2 or will be prepared, directly related to this proposal.
3

4 In accordance with DOE "National Environmental Policy Act Implementing
5 Procedures" (10 *Code of Federal Regulations* 1021), an evaluation of
6 potential environmental impacts associated with the proposed upgrades at
7 the 219-S Waste Handling Facility was prepared to comply with the
8 *National Environmental Policy Act (NEPA) of 1969*. An Environmental
9 Assessment (EA), *222-S Radioactive Liquid Waste Line Replacement and*
10 *219-S Secondary Containment Upgrade, Hanford Site, Richland, Washington,*
11 *(DOE/EA-0944)* was prepared and a Finding of No Significant Impact was
12 issued by the U.S. Department of Energy.
13

14 General information concerning the Hanford Facility environment can be
15 found in the *Hanford Site NEPA Characterization, PNL-6415, Rev. 6,*
16 *Pacific Northwest Laboratory (PNL), Richland, Washington (PNL 1994).*
17

- 18 9. Do you know whether applications are pending for government approvals of
19 other proposals directly affecting the property covered by your proposal?
20 If yes, explain.
21

22 No applications to government agencies are known to be pending for this
23 proposed action.
24

- 25 10. List any government approvals or permits that will be needed for your
26 proposal, if known.
27

28 A Notice of Intent for the 222-S Laboratory Complex and a SEPA
29 Environmental Checklist was submitted to the Washington State Department
30 of Ecology (Ecology) in November of 1991 for the expansion of tank
31 storage at the 219-S Waste Handling Facility.
32

33 Dangerous Waste Part B permit application documentation was submitted to
34 Ecology on December 31, 1991, which included the increase in capacity of
35 the 219-S Waste Handling Facility treatment and storage tanks.
36

37 This checklist, 222-S Laboratory Complex (Supplement 1), is being
38 submitted with the NOI for the 222-S Laboratory Complex, which also
39 includes the change in waste container storage and tank storage
40 capacities at the 222-S Laboratory Complex.
41

- 42 11. Give brief, complete description of your proposal, including the proposed
43 uses and the size of the project and site. There are several questions
44 later in this checklist that ask you to describe certain aspects of your
45 proposal. You do not need to repeat those answers on this page.
46

47 The 219-S Waste Handling Facility contains three stainless steel tanks
48 (101, 102, and 103) that are located in two underground concrete cells.
49 Tanks 101 and 103 are used for storage of liquid mixed waste from the
50 222-S Analytical Laboratory. Liquid mixed waste is transferred from

1 tanks 101 and 103 to tank 102 for treatment and storage before transfer
2 to the Double-Shell Tank System.
3

4 The 219-S Waste Handling Facility is being upgraded to bring the
5 dangerous waste containment system into compliance with WAC 173-303-640
6 for secondary containment of all tanks and piping systems. Tanks 101 and
7 102 would be removed from Cell A and would be decontaminated and
8 inspected. The tanks would be reconditioned and reinstalled. Tank 103
9 would be isolated and left in place in Cell B. A new tank, Tank 104,
10 would be installed in a spare vault in Cell B and would replace the
11 function of Tank 103. Secondary containment would be provided in the
12 cells by coating the compartments with a chemically resistant sealer and
13 installing stainless steel liners.
14

15 Tank 104 would have a storage capacity of 7,200 liters. This is
16 1,500 liters more than tank 103. Therefore, the total design capacity
17 for the storage of liquid mixed waste in the 219-S Waste Handling
18 Facility would be increased by 1,500 liters to 37,000 liters.
19

20 The 222-S Dangerous and Mixed Waste Storage Area consists of two metal
21 storage structures resting on a concrete pad. These metal structures are
22 used for the storage of containers holding mixed waste and nonradioactive
23 dangerous waste from the 222-S Laboratory Complex. The containers are
24 stored until transfer to the Central Waste Complex or to the
25 616 Nonradioactive Dangerous Waste Storage Facility.
26

27 The 222-S Dangerous and Mixed Waste Storage Area would be upgraded to
28 bring this area into compliance with applicable fire codes. The two
29 existing storage structures would be replaced by two new prefabricated
30 RCRA-qualified storage structures that would comply with WAC 173-303 and
31 the fire codes. Although the new structures would be smaller than the
32 existing storage structures, the overall capacity of the storage area
33 would increase because some of the storage containers can be stacked in
34 multiple layers in the new structures. Currently, containers can be
35 stored only in a single layer.
36

37 As a result of stacking containers in the new structures, the capacity of
38 the 222-S Dangerous and Mixed Waste Storage Area would be increased by
39 1,700 liters to a total capacity of 3,700 liters.
40

- 41 12. Location of the proposal. Give sufficient information for a person to
42 understand the precise location of your proposed project, including a
43 street address, if any, and section, township, and range, if known. If a
44 proposal would occur over a range of area, provide the range or
45 boundaries of the site(s). Provide a legal description, site plan,
46 vicinity map, and topographic map, if reasonably available. While you
47 should submit any plans required by the agency, you are not required to
48 duplicate maps or detailed plans submitted with any permit applications
49 related to this checklist.
50

1 The 222-S Laboratory Complex is located in the southeastern corner of the
2 200 West Area in Section 1, T 12 N, R 25 E, (Willamette Baseline and
3 Meridian). The complex is approximately 28 kilometers northwest of the
4 city of Richland, Washington.

5
6 The 219-S Waste Handling Facility is located northeast of the
7 222-S Analytical Laboratory and the 222-S Dangerous and Mixed Waste
8 Storage Area is located north of the 222-S Analytical Laboratory. Site
9 plans and maps are included in the accompanying NOI.

10
11
12 **TO BE COMPLETED BY APPLICANT**

**EVALUATIONS FOR
AGENCY USE ONLY**

13
14 **B. ENVIRONMENTAL ELEMENTS**

15
16 **1. Earth**

17
18 a. General description of the site (circle
19 one): Flat, rolling, hilly, steep slopes,
20 mountainous, other _____.

21
22 The site is essentially flat.

23
24 b. What is the steepest slope on the site
25 (approximate percent slope)?

26
27 Approximately 2 percent.

28
29 c. What general types of soils are found on the
30 site? (for example, clay, sandy gravel,
31 peat, muck)? If you know the classification
32 of agricultural soils, specify them and note
33 any prime farmland.

34
35 The soil at the site consists of compacted
36 sand and gravel fill underlain by sandy
37 gravel with excellent drainage
38 characteristics. No farming is permitted on
39 the Hanford Facility.

40
41 d. Are there surface indications or history of
42 unstable soils in the immediate vicinity?
43 If so, describe.

44
45 No.

46
47 e. Describe the purpose, type, and approximate
48 quantities of any filling or grading
49 proposed. Indicate source of fill.

50
51 No fill or grading would be carried out.

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SEPA Checklist
 222-S Laboratory Complex
 Supplement 1
 Page 5 of 19

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
 AGENCY USE ONLY

- 1 f. Could erosion occur as a result of clearing,
 2 construction, or use? If so, generally
 3 describe.
 4
 5 No erosion would be expected.
 6
 7 g. About what percent of the site will be
 8 covered with impervious surfaces after
 9 project construction (for example, asphalt
 10 or buildings)?
 11
 12 The existing sites would not have any
 13 additional surface covered by construction.
 14
 15 h. Proposed measures to reduce or control
 16 erosion, or other impacts to the earth, if
 17 any:
 18
 19 No erosion would be expected.
 20
 21 2. Air
 22
 23 a. What types of emissions to the air would
 24 result from the proposal (i.e., dust,
 25 automobile, odors, industrial wood smoke)
 26 during construction and when the project is
 27 completed? If any, generally describe and
 28 give approximate quantities, if known.
 29
 30 No impacts beyond those from current use
 31 would be expected.
 32
 33 b. Are there any off-site sources of emissions
 34 or odors that may affect your proposal? If
 35 so, generally describe.
 36
 37 None.
 38
 39 c. Proposed measures to reduce or control
 40 emissions or other impacts to the air, if
 41 any?
 42
 43 None.
 44

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

- 1 3. Water
- 2
- 3 a. Surface
- 4
- 5 1) Is there any surface water body on or
- 6 in the immediate vicinity of the site
- 7 (including year-round and seasonal
- 8 streams, saltwater, lakes, ponds,
- 9 wetlands)? If yes, describe type and
- 10 provide names. If appropriate, state
- 11 what stream or river it flows into.
- 12
- 13 None.
- 14
- 15 2) Will the project require any work over,
- 16 in, or adjacent to (within 200 feet)
- 17 the described waters? If yes, please
- 18 describe and attach available plans.
- 19
- 20 No.
- 21
- 22 3) Estimate the amount of fill and dredge
- 23 material that would be placed in or
- 24 removed from surface water or wetlands
- 25 and indicate the area of the site that
- 26 would be affected. Indicate the source
- 27 of fill material.
- 28
- 29 None.
- 30
- 31 4) Will the proposal require surface water
- 32 withdrawals or diversions? Give
- 33 general description, purpose, and
- 34 approximate quantities if known.
- 35
- 36 No.
- 37
- 38 5) Does the proposal lie within a 100-year
- 39 floodplain? If so, note location on
- 40 the site plan.
- 41
- 42 No.
- 43

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SEPA Checklist
 222-S Laboratory Complex
 Supplement 1
 Page 7 of 19

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
 AGENCY USE ONLY

- 1 6) Does the proposal involve any
 2 discharges of waste materials to
 3 surface waters? If so, describe the
 4 type of waste and anticipated volume of
 5 discharge.
 6
 7 No.
 8
 9 b. Ground
 10
 11 1) Will ground water be withdrawn, or will
 12 water be discharged to ground water?
 13 Give general description, purpose, and
 14 approximate quantities if known.
 15
 16 No.
 17
 18 2) Describe waste material that will be
 19 discharged into the ground from septic
 20 tanks or other sources, if any (for
 21 example: Domestic sewage; industrial,
 22 containing the following chemicals...;
 23 agricultural; etc.). Describe the
 24 general size of the system, the number
 25 of such systems, the number of houses
 26 to be served (if applicable), or the
 27 number of animals or humans the
 28 system(s) are expected to serve.
 29
 30 None.
 31
 32 c. Water Run-off (including storm water)
 33
 34 1) Describe the source of run-off
 35 (including storm water) and method of
 36 collection and disposal, if any
 37 (include quantities, if known). Where
 38 will this water flow? Will this water
 39 flow into other waters? If so,
 40 describe.
 41
 42 There would be no surface run-off
 43 resulting from the project.
 44

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

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2) Could waste materials enter ground or surface waters? If so, generally describe.

Yes, if in the remote possibility that the liquid waste stored in the tanks at 219-S were to escape from both primary and secondary containment equipment. Operation of the tanks would be monitored, and procedures would be in place to prevent or respond to releases to the ground or surface waters.

d. Proposed measures to reduce or control surface, ground, and run-off water impacts, if any:

In the event a tank leak is detected, inflow to the leaking tank would be cut off and the remaining contents of the tank would be transferred to another tank. To the extent possible, any contaminated soil would be cleaned up.

4. Plants

a. Check or circle the types of vegetation found on the site.

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

Small amounts of forbes and grasses can be seasonally present.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

1 b. What kind and amount of vegetation will be
2 removed or altered?

3
4 None.

5
6 c. List threatened or endangered species known
7 to be on or near the site.

8
9 None.

10
11 d. Proposed landscaping, use of native plants,
12 or other measures to preserve or enhance
13 vegetation on the site, if any:

14
15 None.

16
17 5. Animals

18
19 a. Underline any birds and animals which have
20 been observed on or near the site or are
21 known to be on or near the site:

22
23 birds: hawk, heron, eagle, songbirds,
24 other:.....
25 mammals: deer, bear, elk, beaver,
26 other:.....Small mammals
27 fish: bass, salmon, trout, herring,
28 shellfish, other:.....
29

30 Raptors (burrowing owls, ferruginous,
31 retail, and Swainson's hawks) are seen
32 occasionally in the 200 West Area. Small
33 passerines (sparrows, starlings, finches)
34 also are present in the general vicinity.
35 Mule deer, rabbits, badgers, and coyotes
36 occasionally are seen in the general area.
37

38 b. List any threatened or endangered species
39 known to be on or near the site.

40
41 None.

42
43 c. Is the site part of a migration route? If
44 so, explain.

45
46 The Hanford Facility is a part of the broad
47 Pacific Flyway for migratory waterfowl.
48

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

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47

d. Proposed measures to preserve or enhance wildlife, if any:

None.

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electricity and steam would be used for heating and ventilation.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None.

7. Environmental Health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

There would be risk to workers of exposure to mixed waste in the 219-S Waste Handling Facility during the removal and decontamination of the tanks and piping, the decontamination of the cells, and the reinstallation of the tanks and pipes. There would be risk of worker exposure to mixed waste or dangerous chemicals during removal of waste containers from the existing storage units and moving the

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SEPA Checklist
 222-S Laboratory Complex
 Supplement 1
 Page 11 of 19

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
 AGENCY USE ONLY

1 containers to the new 222-S Dangerous and
 2 Mixed Waste Storage Units.

- 3
 4 1) Describe special emergency services
 5 that might be required.

6
 7 Hanford Facility security, fire
 8 response, and ambulance services are on
 9 call at all times in the event of an
 10 onsite emergency.

- 11
 12 2) Proposed measures to reduce or control
 13 environmental health hazards, if any:

14
 15 All removal, waste handling, and
 16 decontamination activities would be
 17 controlled by approved radiological and
 18 industrial safety procedures and
 19 administrative controls that prevent or
 20 minimize worker exposure to radiation
 21 or hazardous chemicals. Radiation
 22 monitoring of work areas, use of
 23 shielding or remote handling if found
 24 necessary, and limitations on
 25 individual exposure time would be used
 26 to limit worker radiation exposure.
 27 Exposure of onsite personnel to
 28 radiation doses or hazardous substances
 29 must be limited by safety procedures to
 30 as low as reasonably achievable.

31
 32 b. Noise

- 33
 34 1) What type of noise exists in the area,
 35 which may affect your project (for
 36 example: traffic, equipment,
 37 operation, other)?

38
 39 Normal traffic noise and noise from
 40 operating equipment.

- 41
 42 2) What types and levels of noise would be
 43 created by or associated with the
 44 project on a short-term or a long-term
 45 basis (for example: traffic,
 46 construction, operation, other)?
 47 Indicate what hours noise would come
 48 from the site.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

1 Operation of construction equipment and
2 a minor increase in traffic would cause
3 slightly increased noise levels during
4 daylight hours for a short time.

6 3) Proposed measures to reduce or control
7 noise impacts, if any:

9 If necessary during construction,
10 appropriate measures to protect workers
11 would be employed.

13 8. Land and Shoreline Use

15 a. What is the current use of the site and
16 adjacent properties?

18 The Hanford Facility is a single RCRA
19 facility identified by the
20 U.S. Environmental Protection Agency
21 (EPA)/State Identification Number
22 WA7890008967 that consists of over 60 TSD
23 units conducting dangerous waste management
24 activities. These TSD units are included in
25 the *Hanford Facility Dangerous Waste Part A*
26 *Permit Application*. The Hanford Facility
27 consists of all contiguous land, and
28 structures, other appurtenances, and
29 improvements on the land, used for
30 recycling, reusing, reclaiming,
31 transferring, storing, treating, or
32 disposing of dangerous waste, which, for the
33 purposes of the RCRA, are owned by the
34 U.S. Government and operated by the DOE-RL,
35 excluding land owned by Washington State.

37 b. Has the site been used for agriculture? If
38 so, describe.

40 No portion of the 200 Areas has been used
41 for agricultural purposes since 1943.

43 c. Describe any structures on the site.

46 The 219-S Waste Handling Facility has three
47 storage tanks in which liquid mixed waste
48 from the 222-S Analytical Laboratory can be

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 222-S Laboratory Complex
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EVALUATIONS FOR
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- 1 received, treated, and stored. The treated
 2 mixed waste is transferred to the
 3 Double-Shell Tank System. A sodium-supply
 4 tank, of 2,650-liter capacity, also is
 5 located in this area.
 6
 7 The 222-S Dangerous and Mixed Waste Storage
 8 Area consists of two storage structures
 9 located on a concrete pad on the north side
 10 of the 222-S Analytical Laboratory Building.
 11 The 222-S Dangerous and Mixed Waste Storage
 12 Area stores containers of mixed and
 13 dangerous waste. The containers are stored
 14 until transferred to the Central Waste
 15 Complex (mixed waste) or to the
 16 616 Nonradioactive Dangerous Waste Storage
 17 Facility (nonradioactive dangerous waste)
 18 for storage.
 19
 20 d. Will any structures be demolished? If so,
 21 what?
 22
 23 No.
 24
 25 e. What is the current zoning classification of
 26 the site?
 27
 28 The Hanford Site is zoned by Benton County
 29 as an Unclassified Use (U) district.
 30
 31 f. What is the current comprehensive plan
 32 designation of the site?
 33
 34 The 1985 Benton County Comprehensive Land
 35 Use Plan designates the Hanford Site as the
 36 "Hanford Reservation". Under this
 37 designation, land on the Hanford Site may be
 38 used for "activities nuclear in nature."
 39 Nonnuclear activities are authorized "if and
 40 when DOE approval for such activities is
 41 obtained".
 42
 43 g. If applicable, what is the current shoreline
 44 master program designation of the site?
 45
 46 Does not apply.
 47

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EVALUATIONS FOR
AGENCY USE ONLY

- 1 h. Has any part of the site been classified as
2 an "environmentally sensitive" area? If so,
3 specify.
4
5 No.
- 6
7 i. Approximately how many people would reside
8 or work in the completed project?
9
10 Approximately 20 workers would be employed
11 at the 219-S Waste Handling Facility and the
12 222-S Dangerous and Mixed Waste Storage
13 Area.
14
- 15 j. Approximately how many people would the
16 completed project displace?
17
18 None.
- 19
20 k. Proposed measures to avoid or reduce
21 displacement impacts, if any:
22
23 None.
- 24
25 l. Proposed measures to ensure the proposal is
26 compatible with existing and projected land
27 uses and plans, if any:
28
29 Does not apply. (Refer to answer to
30 Checklist Question B.8.f.).
31

32 9. Housing

- 33
34 a. Approximately how many units would be
35 provided, if any? Indicate whether high,
36 middle, or low-income housing.
37
38 None.
- 39
40 b. Approximately how many units, if any, would
41 be eliminated? Indicate whether high,
42 middle, or low-income housing.
43
44 None.
45

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AGENCY USE ONLY

- 1 c. Proposed measures to reduce or control
2 housing impacts, if any:
3
4 None.
5
- 6 10. Aesthetics
7
- 8 a. What is the tallest height of any proposed
9 structure(s), not including antennas; what
10 is the principal exterior building
11 material(s) proposed?
12
13 The new storage structures at the
14 222-S Dangerous and Mixed Waste Storage Area
15 will be approximately 2.5 meters high.
16
- 17 b. What views in the immediate vicinity would
18 be altered or obstructed?
19
20 None.
21
- 22 c. Proposed measures to reduce or control
23 aesthetic impacts, if any:
24
25 None.
26
- 27 11. Light and Glare
28
- 29 a. What type of light or glare will the
30 proposal produce? What time of day would it
31 mainly occur?
32
33 None.
34
- 35 b. Could light or glare from the finished
36 project be a safety hazard or interfere with
37 views?
38
39 No.
40
- 41 c. What existing off-site sources of light or
42 glare may affect your proposal?
43
44 None.
45

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1 d. Proposed measures to reduce or control light
2 and glare impacts, if any:

3
4 None.

5
6 12. Recreation

7
8 a. What designated and informal recreational
9 opportunities are in the immediate vicinity?

10
11 None.

12
13 b. Would the proposed project displace any
14 existing recreational uses? If so,
15 describe.

16
17 None.

18
19 c. Proposed measures to reduce or control
20 impacts on recreation, including recreation
21 opportunities to be provided by the project
22 or applicant, if any?

23
24 None.

25
26 13. Historic and Cultural Preservation

27
28 a. Are there any places or objects listed on,
29 or proposed for, national, state, or local
30 preservation registers known to be on or
31 next to the site? If so, generally
32 describe.

33
34 No places or objects listed on, or proposed
35 for, national, state, or local preservation
36 registers are known to be on or next to the
37 site.

38
39 b. Generally describe any landmarks or evidence
40 of historic, archaeological, scientific, or
41 cultural importance known to be on or next
42 to the site.

43
44 There are no known archeological,
45 historical, or Native American religious
46 sites on or next to the 222-S Laboratory
47 Complex.
48

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 222-S Laboratory Complex
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 AGENCY USE ONLY

- 1 c. Proposed measures to reduce or control
 2 impacts, if any:
 3
 4 None.
 5
- 6 14. Transportation
 7
- 8 a. Identify public streets and highways serving
 9 the site, and describe proposed access to
 10 the existing street system. Show on site
 11 plans, if any.
 12
 13 There are no public streets or highways near
 14 the site.
 15
- 16 b. Is site currently served by public transit?
 17 If not, what is the approximate distance to
 18 the nearest transit stop?
 19
 20 No. The nearest public transit is
 21 approximately 48 kilometers away.
 22
- 23 c. How many parking spaces would the completed
 24 project have? How many would the project
 25 eliminate?
 26
 27 None.
 28
- 29 d. Will the proposal require any new roads or
 30 streets, or improvements to existing roads
 31 or streets, not including driveways? If so,
 32 generally describe (indicate whether public
 33 or private).
 34
 35 No.
 36
- 37 e. Will the project use (or occur in the
 38 immediate vicinity of) water, rail, or air
 39 transportation? If so, generally describe.
 40
 41 No.
 42
- 43 f. How many vehicular trips per day would be
 44 generated by the completed project? If
 45 known, indicate when peak volumes would
 46 occur.
 47
 48 None.

TO BE COMPLETED BY APPLICANT

EVALUATIONS FOR
AGENCY USE ONLY

- 1 g. Proposed measures to reduce or control
2 transportation impacts, if any:
3
4 None.
5
- 6 15. Public Services
7
- 8 a. Would the project result in an increased
9 need for public services (for example: fire
10 protection, police protection, health care,
11 schools, other)? If so, generally describe.
12
13 None.
14
- 15 b. Proposed measures to reduce or control
16 direct impacts on public services, if any:
17
18 None.
19
- 20 16. Utilities
21
- 22 a. Circle utilities currently available at the
23 site: electricity, natural gas, water,
24 refuse service, telephone, sanitary sewer,
25 septic system, other:
26
27 Electricity, water, telephone, Hanford Local
28 Area Network computer link, and sanitary
29 sewer are available at the 222-S Laboratory
30 Complex.
31
- 32 b. Describe the utilities that are proposed for
33 the project, the utility providing the
34 service, and the general construction
35 activities on the site or in the immediate
36 vicinity, which might be needed.
37
38 No additional utilities are needed.
39

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1 **SIGNATURE**

2
3 The above answers are true and complete to the best of my knowledge. I
4 understand that the lead agency is relying on them to make its decision.
5
6
7
8
9

10
11 _____
12 James E. Rasmussen, Division Director
13 Office of Environmental Assurance,
14 Permits, and Policy Division
15 U.S. Department of Energy
16 Richland Operations Office
17
18
19
20

Date

21 _____
22 William T. Dixon, Director
23 Environmental Services
Westinghouse Hanford Company

Date

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APPENDIX C

SUMMARY OF NOTICES OF COMPLIANCE VIOLATIONS AND
THE U.S. DEPARTMENT OF ENERGY, RICHLAND OPERATIONS OFFICE RESPONSES

1
2
3
4
5

Will be included with submittal to Ecology.

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford	5/03/84	RCRA	Formal	Closed	Ecology	State Order DE 84-267 required the U.S. Department of Energy (DOE) to allow the state to access the Hanford Site to conduct formal compliance assessments of nonradioactive hazardous waste facilities.	The first comprehensive compliance inspection of Hanford by the State of Washington occurred on June 11-14, 1985. Since then, Ecology has conducted numerous formal compliance assessments of the nonradioactive hazardous waste facilities.
Hanford	12/26/84	RCRA	Formal	Closed	Ecology	State Order DE 84-720 covered several interim status compliance actions associated with nonradioactive hazardous waste facilities.	The action to achieve compliance with this order is complete. Part A applications for the facilities in question were submitted in July 1985. This date met the schedule specified in the order.
Hanford	1/29/85	SWPCA	Formal	Closed	Ecology	State Order DE 85-130 covered alleged violations of state water quality statute Revised Code of Washington (RCW) 90.48 related to Plutonium Finishing Plant (PFP) chemical sewer releases.	DOE did not acknowledge the applicability of state statutes to its activities at that time. Therefore, no specific steps were taken in response to the order, although a discussion of the circumstances was provided as a matter of comity.
Hanford	1/15/86	--	Formal	Closed	Ecology	State Order DE 85-677 covered alleged violations of state water quality statute RCW 90.48 related to Plutonium Uranium Extraction (PUREX) chemical sewer releases.	By May 1, 1986, all facility modifications and procedural changes specified in the order were in place.
Hanford	2/06/86	--	Formal	Closed	Ecology/EPA	State Orders DE 86-132 and DE 86-133 and EPA Order 1085-10-07-3008 (followed by Consent Order with the State, DE 86-133) covered RCRA waste accumulation, groundwater monitoring, and interim status closure plans.	DOE, Richland Operations Office (RL), submitted a plan to Ecology on March 7, 1986, assuring that the storage of dangerous wastes was conducted in accordance with state regulations. Groundwater monitoring networks were installed at various facilities. The groundwater sampling programs associated with these groundwater monitoring networks are in compliance with RCRA. The required closure/post-closure plans were submitted to Ecology in November 1985.

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 1985
 1986

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford	11/21/86	TSCA	Formal	Closed	EPA	A Complaint and Notice of Opportunity for Negotiation was issued against RL alleging violations of provisions for use of hydraulic systems in the PCB regulations. The complaint followed a May 21, 1986, inspection by the U.S. Environmental Protection Agency (EPA) that was conducted to determine whether activities were in compliance with PCB regulations.	RL responded to the Complaint on January 7, 1987, with verification that the 3760 Building reservoir was drained and refilled with new, non-PCB hydraulic oil on December 4, 1986. RL stated in the letter that they believed no further action or documentation was required.
Hanford	10/30/87	RCRA	Formal	Closed	Ecology	State Order DE 87-295 covered state dangerous waste releases (mixed waste) to the 216-A-368 Crib.	All discharges were stopped and the crib was permanently closed to use. Wells drilled in accordance with dates set forth in the order (June 1, 1986) and regular sampling are ongoing. The part A permit for the facility was submitted February 2, 1988.
Hanford (WHC)	4/11/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and Westinghouse Hanford Company (WHC) of a Notice of Violation within three areas based on their April 10-11, 1989, inspection of B Pond and the Nonradioactive Dangerous Waste Landfill.	Three findings were identified: (1) the need to construct at least a continuous single-strand rope fence with warning signs around B Pond and each of the three associated lobes; (2) the need to repair a 25-foot breach in the security fence surrounding the Nonradioactive Dangerous Waste Landfill; and (3) the need to evaluate the wooden pier over the 216-A-29 Ditch for stability and to establish load limits for its use. The single-strand rope fence with appropriate warning signs has been installed around B Pond and its three lobes. The fence at the Nonradioactive Dangerous Waste Landfill has been repaired. The wooden pier over the 216-A-29 Ditch has been taken out of service. "DANGER - KEEP OFF" signs have been posted, and the structures have been barricaded.

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	6/12/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and WHC of a Notice of Violation within two areas based on their June 12, 1989, inspection of the 183-H Basins and 216-S-10 Pond and Ditch.	Two findings were identified: (1) the need to construct at least a continuous single-strand rope fence with appropriate warning signs around the 216-S-10 Pond and Ditch before August 15, 1989; and (2) the need to stabilize two corroded and leaking drums containing mixed waste located at the 183-H Basins. A single-strand barrier rope was installed with the appropriate warning signs around the 216-S-10 Pond and Ditch. The contents of the leaking drums were removed and repackaged in appropriately prepared drums. An inspection was conducted on the other drums containing dangerous waste at the 183-H facility and no other irregularities were noted. The Central Waste Complex, which receives 183-H dangerous waste drums, was inspected and no irregularities were noted. An analysis also was conducted on the probable cause of the corrosive material found on the drums. The results were presented to Ecology.
Hanford (WHC)	7/20/89	RCRA	Formal	Closed	Ecology	Ecology notified RL and WHC of a Notice of Violation within three areas based on their July 20, 1989, inspection of the 216-A-29 Ditch, 216-B Pond, and the Central Waste Complex.	Three findings were identified: (1) the need to construct, at a minimum, a continuous single-strand chain fence with appropriate warning signs around the 216-A Ditch by September 30, 1989; (2) four radiation warning signs were found unsecured on the ground near the 216-A-29 Ditch and 216-B Pond facilities; and (3) 10 waste drums at Central Waste Complex were found to have exceeded the 90-day accumulation period while at the generating facility.

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							<p>A continuous single-strand barrier was installed around the 216-A-29 Ditch and 216-B Pond. The unsecured signs have been reposted. Periodic inspections will be conducted to identify necessary corrective actions such as unsecured signs.</p> <p>The 10 waste drums that exceeded the 90-day accumulation period were identified as originating from PFP. These drums were partially characterized and transferred to the Central Waste Complex for proper storage. A letter identifying the dangerous and mixed waste satellite and less-than-90-day accumulation areas on the Hanford Site was transmitted to Ecology.</p>
Hanford (WHC)	4/25/90	HMTA	Formal	Closed	DOT	On April 25, 1990, the Department of Transportation issued a Federal Railroad Administration Probable Notice of Violation against WHC for violating the Hazardous Materials Transportation Act, and fined WHC \$3,000.	The procedures were corrected to the satisfaction of DOT and, after negotiations, the fine was reduced to \$2,100, which was paid by WHC.
Hanford (WHC)	12/10/90	RCRA	Formal	Closed	Ecology	On December 10, 1990, Ecology notified RL and WHC of a Notice of Noncompliance for returning 68 problem drums from the Central Waste Complex to the generator, the 183-H Basins. Ecology did not take any formal action, but requested that the 68 drums be repackaged and returned to the Central Waste Complex before December 25, 1990.	RL received concurrence from Ecology to extend the deadline to January 15, 1991. The repackaging of the drums was initiated on December 18, 1990; however, this effort was hampered by unfavorable weather conditions. Eight additional working days were lost due to high winds, snow, and rain. All 68 of the problem drums were subsequently repackaged and returned to the Central Waste Complex by January 25, 1991. Ecology was both verbally notified by WHC and officially notified by RL of this additional delay.

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	10/07/91	CAA	Informal	Closed	DOH	DOH conducted a technical review of radioactive air emissions from PFP July 16-18, 1991. One finding and five observations were identified.	A letter from DOH to RL on September 19, 1994, formally closed this item.
Hanford (WHC)		NPDES	Informal	Closed	Fisheries	In March 1991, RL began construction of a new filter backwash pond in the 300 Area. A component of this construction project was a new outfall to the Columbia River. Army Corps of Engineers' approval was secured for the outfall. An NPDES permit has been applied for, and all the necessary NEPA documentation is in place; however, RL failed to apply for the necessary hydraulic project permit approval from the Washington State Department of Fisheries (Fisheries) and for a temporary water quality modification permit from Ecology before construction of the outfall.	<p>Fisheries performed an inspection of the construction project in June 1991. As a result of the inspection, Fisheries recorded this activity as a violation because a portion of the construction was performed below the high-water mark on the Columbia River without a permit.</p> <p>RL was instructed by Fisheries to do the following: (1) place a screen on the outlet of the outfall to prevent fish from trying to swim up the pipe; (2) repair the damage to the vegetation that occurred during construction; and (3) contact Ecology on whether a water quality modification permit should be applied for after construction is complete.</p> <p>A screen was placed on the outfall in December. A new hydraulic project permit has been received to allow for new trees to be planted. Trees were planted to replace the damaged vegetation during March. Ecology has indicated construction of the outfall has already occurred.</p> <p>Although this was considered a violation, no citation was issued to RL or its contractors. Fisheries also stated that there was no significant environmental impact due to the construction of this outfall.</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	5/14/92	RCRA	Informal	Open	Ecology	Ecology issued an inspection report for Tank 241 -SY-101 that alleges RL was in violation of State Dangerous Waste Regulations (WAC 173-303). These violations included the failure to inspect monitoring systems, failure to provide and operate adequate leak detection, failure to allow inspectors access to training records, and failure to properly identify personnel in the training plan.	<p>RL has issued three responses to the state regarding the alleged violations according to the schedule in the inspection report. RL has completed all corrective actions as required by Ecology. No formal notification indicating satisfactory completion of the corrective actions has been received by Ecology.</p> <p>Correspondence from Ecology in October 1994 indicated this item would remain open until a followup inspection could occur.</p>
Hanford (WHC)	7/16/92	RCRA	Informal	Closed	Ecology	Ecology issued an inspection report for an overflow of PUREX tank F18. The primary violations that were alleged included lack of spill reporting, failure to inspect monitoring systems, and lack of adequate secondary containment and overfill prevention controls.	<p>A letter was sent April 28, 1993, from Ecology to RL and WHC stating formal closure of this item.</p>
Hanford (WHC)	8/05/92	CAA	Informal	Open	DOH	DOH conducted an audit of 200 East Area Tank Farms during March and April 1992 and identified 21 findings, 10 observations, and 9 best management practices related to airborne radioactive emissions from the tank farms.	<p>The primary findings centered around potential shortcomings in compliance with the reasonably available control technology engineering standard. RL has completed corrective actions to close these findings.</p> <p>A response was sent to DOH in November 1992. On September 2, 1994, DOH sent a letter to RL indicating that 10 findings were still open, and that the remaining observations (now called findings Level IV) and BMPs were closed. The letter requested that the remaining open items be completed by November 1, 1994.</p> <p>Tank farms personnel met with DOH on November 8, 1994, to discuss the original responses</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							and were unable to close any of the items at that time. They met again on November 22, 1994, to discuss a closure plan. Tank farms personnel agreed to submit responses by January 31, 1995.
Hanford (WHC)	9/22/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for T Plant that alleges RL and WHC were in violation of WAC 173-303. These violations included failure to meet waste generator and accumulation standards such as recordkeeping inspections, use and management of containers, waste designation, and spills and discharges.	On March 3, 1995, DOH sent RL a letter closing three findings. The letter stated DOH was unsatisfied with the other responses to the findings, and provided additional guidance to respond to these items. RL and WHC have issued a response according to the schedule described in the inspection report. Most corrective actions have been completed. Ecology has noted T Plant's efforts to resolve their violations and has officially closed this enforcement action.
Hanford (WHC)	9/29/92	CAA	Informal	Closed	DOH	DOH issued a report detailing 15 action items from an investigation concerning an unresolved safety question at the B Plant main stack ventilation system.	These action items included providing a response to the following: improper notification of DOH for emission control system modifications, potentially inadequate emission control system, and improper ventilation sealing systems. A response was provided by RL within the designated 45-day time period. Five of the action items have been completed to the satisfaction of DOH. Closure of the remaining 10 action items will occur after completion of corrective actions and ongoing negotiations with DOH. A followup inspection occurred on June 22, 1994, and on September 16, 1994, DOH sent a letter to RL formally closing this inspection.

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	10/06/92	CAA	Informal	Closed	DOH	DOH issued a report for an audit performed at the Uranium Trioxide Facility that identified five minor findings.	These findings were related to sampling data collection, data reporting, and monitoring equipment calibration. RL issued a response within the designated 45-day time period. Two of the findings have been closed to the satisfaction of DOH. DOH sent a letter to RL dated February 11, 1994, to close the remaining items identified during the surveillance.
Hanford (WHC)	10/23/92	TSCA	Formal	Closed	EPA	The EPA issued a Notice of Noncompliance based on an inspection conducted in September 1991. One violation related to the cleanup of a PCB spill was identified.	On November 13, 1992, RL responded to the Notice of Noncompliance. RL stated in the response that the cleanup of the PCB spill was completed on September 28, 1991, not October 1, 1991, as alleged in the Notice of Noncompliance. RL also outlined corrective actions to ensure that cleanup of PCB spills are initiated and completed within the required 48 hours. On November 25, 1992, EPA sent a letter to RL stating they were satisfied with RL's response and corrective actions and closed the issue.
Hanford (KEH)	10/27/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and Kaiser Engineers Hanford (KEH) alleging violations of WAC 173-303. These violations included failure to meet the waste generator and accumulation standards such as waste designation, personnel training, recordkeeping, and the use of a management of containers.	RL and KEH issued a response within the designated time period. A letter mailed on January 14, 1993, from Ecology to RL formally closed this item.
Hanford (PNL)	10/30/92	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for the 305-B storage facility alleging RL and Pacific Northwest Laboratory (PNL) are in violation of WAC 173-303.	The violations included improper waste designation, an inadequate contingency plan, an inadequate waste inventory, improper container labeling, and improper storage of

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							waste according to their fire code. RL and PNL issued a response that disputed all findings. These findings were resolved in a letter sent from Ecology to RL on April 7, 1993.
Hanford (WHC)	11/12/92	RCRA	Informal	Closed	Ecology	Ecology issued a letter alleging that RL and WHC are in violation of WAC 173-303. These violations included leak detection, lack of secondary containment, delayed notification and reporting, and inadequate personnel training at the single-shell tanks.	Ecology also prepared a Tri-Party Agreement change control form establishing enforceable milestones to address the violations. RL and WHC have issued a response requesting that negotiations begin to address the proposed milestones.
Hanford (WHC)	1/15/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for issues related to the storage of mixed waste in the 241-SY-101 Tank Farm.	The violations noted included exceeding the waste accumulation limit of 120 days, and compliance problems associated with generator waste storage. RL and WHC have issued a formal response. No additional actions are necessary.
Hanford (WHC)	2/02/93	CAA	Formal	Closed	DOH	DOH issued a Notice of Violation (NOV) for radioactive air emission issues related to the proposed fuel encapsulation activities at the 100-KE fuel storage basins.	The NOV stated that RL and WHC have initiated work that directly supports fuel encapsulation without approval of DOH. The NOV formally directed RL and WHC to stop all work at the 100-KE Basins immediately. RL and WHC formally responded to the NOV, and a Notice of Construction permit was issued in the fall of 1993.
Hanford (WHC)	2/03/93	CAA	Formal	Superce	EPA	EPA issued a Compliance Order to RL and its contractors alleging noncompliance with the National Emission Standards for Hazardous Air Pollutants for radionuclides.	EPA and RL negotiated a Federal Facility Compliance Agreement (FFCA) on February 7, 1994, to allow RL to confirm compliance or meet the compliance requirements of 40 CFR 61, Subpart H. The FFCA superseded the compliance order and this will no longer be tracked as an open item.
Hanford (WHC)	3/10/93	RCRA	Formal	Closed	Ecology	Ecology issued an Order and Notice of Penalty Incurred and Due for failure to adequately designate approximately 2,000 containers of	The Notice of Penalty stipulated a penalty of \$100,000. RL disputed portions of the Order and Notice of Penalty. RL and Ecology have

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
						solid waste.	<p>agreed to resolutions to the disputed portions, and these resolutions have been agreed to by the Washington State Pollution Control Hearing Board, which issued a settlement agreement modifying the Order and Notice of Penalty.</p> <p>The settlement agreement for the Compliance Order required submittal of a Waste Analysis Plan (WAP) to confirm or complete the designation of the waste in question. Extensive negotiations regarding the content of the WAP occurred between RL and Ecology, and final approval was granted by Ecology on November 1, 1993. Confirmation or completion of the waste designation, following the process established by the WAP, must be completed by September 1, 1994.</p> <p>Negotiations regarding an alternative to the payment of the \$100,00 penalty resulted in an agreement that allows RL to set up an Environmental Protection Scholarship in the amount of \$40,000 at Columbia Basin College, and payment to PNL and the Washington Department of Wildlife to plan for and carry out a sagebrush revegetation effort on the Hanford Arid Lands Ecology Reserve.</p> <p>On August 24, 1994, RL transmitted a package to Ecology that completed the actions required by the Order.</p>
Hanford (WHC)	5/12/93	RCRA	Informal	Open	Ecology	Ecology issued a compliance letter for alleged violations related to a spill of ethylene glycol at the 309-E Building to the 300 Area Process	<p>The alleged violations were related to immediate reporting of the incident and access to information. RL prepared a</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
						Trench.	<p>response to this incident within the required time period and considered that all corrective actions required by Ecology were completed. Since then, Ecology indicated that they believed further information was required for them to close this item. On March 22, 1995, RL transmitted a letter to Ecology that provided answers to two questions posed by Ecology regarding the ethylene glycol spill at the 309 Building.</p> <p>RL considers this item closed. No formal notice of closure has been received from Ecology.</p>
Hanford (WHC)	5/24/93	RCRA	Informal	Open	Ecology	Ecology issued a compliance letter for alleged violations of various regulations related to tank system compliance at Tank 241-BX-111.	<p>RL has prepared responses to the letter and has committed to pumping the remaining liquids from the tank. Liquid pumping was initiated in October 1993 and initially was expected to be completed in January 1994. This date was extended to April 30, 1994.</p> <p>After all the liquid was believed to be pumped, pictures were taken and a pool of free liquid was found to be remaining. This was pumped, and it amounted to about 5,000 gallons of supernatant. As of July 12, 1994, all the supernatant liquid had been removed and pumping was continuing on the interstitial liquid.</p> <p>New photographs were taken after this final pumping, and again liquid (estimate approximately 10,000 gallons) was seen in the tank. Additional pumping is planned to occur after further integrity testing of the</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							transfer line.
Hanford (WHC)	7/09/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the generator accumulation standards of WAC 173-303-200 at T Plant.	In March 1995, this tank was declared interim stabilized. These alleged violations occurred during the repackaging of unknown containers that were generated in Tank Farms. RL has completed all corrective actions as required by Ecology. Additional correspondence from Ecology requested more information related to six repackaged waste containers. On December 2, 1993, RL submitted this information to Ecology, and Ecology has indicated satisfaction with this response.
Hanford (WHC)	8/24/93	RCRA	Informal	Closed	Ecology	Ecology was notified on August 12, 1993, of a request to extend the 90-day accumulation period for T Plant waste because of the Tank Farms safety stand down. Ecology denied the extension because they believed the necessary requirements were not satisfied in a letter they received August 18, 1993, from RL.	On September 22, 1993, approval of the 30-day extension was received. The tank car was shipped on September 17, 1994, as agreed to with Ecology. This item is now closed.
Hanford (WHC)	10/15/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the transporter requirements of WAC 173-303-190 at the PUREX Facility.	These alleged violations occurred while the waste was being stored in a tank trailer pending approval from Idaho to accept the waste. RL transmitted a letter to Ecology on June 28, 1994, stating that items in the compliance letter are closed. RL now considers this item closed.
Hanford (WHC)	10/18/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the treatment, storage, and disposal requirements of WAC 173-303 at PUREX.	The primary violations involved not removing liquid from secondary containment within 24 hours and storing wastes in a unit not permitted for storage. These alleged violations occurred while waste was being stored in Tank F18 and Tank F16. Transfer of waste from Tank F16 and Tank F18 to Tank

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	10/18/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the generator accumulation requirements of WAC 173-303-200.	<p>Farms was initiated on October 22, 1993. A total of six transfers were required to remove the waste from Tank F16. The final transfer from Tank F16 was completed on November 1, 1993. RL provided Ecology with a letter on December 14, 1993, to document that Tank F16 was emptied. The letter stated that "with the removal of waste from Tank F16 completed, RL considers this action closed."</p> <p>The violations resulted from a reclassification of four process tanks at the Plutonium Reclamation Facility (PRF) as waste accumulation tanks. Ecology required the implementation of a waste tracking system, that tanks be labeled as hazardous waste accumulation tanks, and providing direction to PRF Operations regarding the regulatory status of PRF waste tanks. The first item has been completed. RL sent a letter to Ecology in late November 1993, which requested information on two exclusions in WAC 173-303-071(3) that may allow reclassification of PRF waste tanks to non-RCRA status.</p> <p>On January 13, 1994, Ecology responded with a letter that stated the above-mentioned tanks were process tanks and, therefore, not subject to generator waste accumulation requirements under the WAC.</p>
Hanford (WHC)	10/26/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations of the generator accumulation requirements of WAC 173-303-200.	<p>The compliance letter resulted from a Hanford-wide inspection of temporary storage and satellite accumulation areas. Several findings and recommended corrective actions were noted in the inspection, and these</p>

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Enforcement Actions

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							corrective actions have been completed.
							At the 1164 Facility, one finding was identified regarding container records. On November 5, 1993, a copy of the records was filed at the facility. The final report to close this item was issued on December 16, 1993. A letter from Ecology on February 17, 1994, formally closed this item.
							At the 1713-H satellite storage area, three findings were identified, and two findings at the 321 Facility were identified. With regard to the 1713-H Facility, RL sent a letter to Ecology on November 15, 1993, listing the corrective actions taken and stating that RL believed these actions "fully resolve the inspection findings." With regard to the 321 Facility, this was a temporary facility that has been closed, thereby eliminating this issue.
Hanford (WHC)	10/27/93	CAA	Informal	Open	DOH	DOH issued a compliance letter after an inspection of the 201-U-1 stack monitoring system on October 1, 1993.	The letter identified two observations. RL had believed that only findings required a formal response, and did not formally respond to the observations. An August 1994 audit by DOH upgraded all former observations to findings (level IV), which required RL to provide a response.
Hanford (WHC)	10/29/93	CAA	Informal	Closed	DOH	DOH issued a report of a surveillance conducted at PUREX during August 1993 that identified one finding related to a lack of auditable	RL transmitted a response to DOH on January 25, 1995. No formal acceptance has been received from DOH. The finding was issued because the health physics procedure document, WHC-IP-0718, which had recently replaced WHC-IP-0692, did

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
						procedures and three best management practices (BMP), one related to tracking sampling instrument serial numbers by location, and two related to clarifying sampling procedures.	not contain PUREX-specific procedures. PUREX Health Physics implemented a field change on November 9, 1993, to incorporate the PUREX-specific procedures into the -0718 document. A followup inspection scheduled for July 18, 1994, to determine resolution of this issue was canceled since DOH had indicated they were satisfied with the corrective action.
Hanford (WHC)	11/17/93	RCRA	Informal	Closed	Ecology	On November 17, 1993, Ecology issued a compliance letter alleging inadequate controls for preventing nonroutine releases of hazardous substances to the environment from WHC-managed facilities in the 300 Area. The subject letter was received following a release of ethylene glycol to the 300 Area Process Sewer from the 309 Building in October 1993.	Closure of this finding was documented in a telephone memorandum on October 17, 1994. RL requested WHC to submit a written response to the subject letter by December 22, 1993 (this date was amended to December 30, 1993). On December 30, 1993, WHC provided this response, which included descriptions of each affected facility and the action required to correct the situation.
Hanford (WHC)	11/17/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations in implementing the WAP.	Ecology has said this issue was satisfied with the submittal of RL's corrective actions, but indicated a followup inspection to verify compliance could occur. On November 17, 1993, Ecology met with RL to discuss alleged deviations from Section 1.4 of the WAP, which requires RL and Ecology to approve changes. Also discussed was a concern regarding waste management training, a request for desk instructions, and a list of responsible persons. The information originally was requested for December 1, 1993. Ecology agreed to delay the response until December 8, 1993, and RL issued the response on that date. The response states that all proposed changes to the WAP will be

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							communicated to Ecology as requested. The letter also addressed the other concerns Ecology had, and made recommendations to assemble a technical team to deal with issues surrounding implementation of the WAP before they became concerns.
Hanford (WHC)	12/06/93	CAA	Informal	Open	DOH	DOH issued a compliance letter following a surveillance on October 6, 1993, at the Fast Flux Test Facility (FFTF), which identified two findings and two BMPs. The letter requested a response from RL within 45 days.	<p>On January 5, 1994, Ecology closed this item. One of the findings was that calibration tags were not on monitoring instrumentation, and the other finding noted that some monitoring instruments had difficulty remaining in calibration because of vender problems. One BMP stated that the Reactor Service Building had limited control and monitoring technologies to detect or control a release. The other BMP stated that the sampler flow measurement equipment and procedures created uncertainty in the accuracy of the measurement. Recommended corrective actions were provided in the compliance letter.</p> <p>RL provided DOH a response to the findings and BMPs on March 2, 1994.</p> <p>A new response was provided to DOH on January 31, 1995. No formal acceptance has been received from DOH.</p>
Hanford (WHC)	12/07/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for allegations that improvements (target actions) to be performed at T Plant as part of the Dangerous Waste Part A Permit Application were found to be either incomplete or unsatisfactory during a December 2, 1993, inspection.	This target action, "Implement Periodic Visual Inspection and Static Leak Test Program for 2706-T and 211-T Tanks," was to be completed by October 1993. Ecology has required implementation of effective visual inspection and leak test programs for the 2706-T and 211-T sumps by December 15, 1993.

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	12/13/93	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for an inspection conducted November 18-22, 1993, at the Transuranic Waste Storage and Assay Facility (TRUSAF) to determine compliance with interim status requirements under WAC 173-303, and to status current activities with respect to the Dangerous Waste Part B Permit Application.	<p>Ecology also required the completion of three corrective actions by January 15, 1994; specifically, repair of the backflow preventer leaking to the 2706-T sump, repair of the leak detection device for 2706-T, and report on the progress of installing or instituting leak detection for the 211-T sump.</p> <p>This item was put on hold while the alleged violations were investigated. On November 7, 1994, Ecology transmitted a letter to RL and WHC that followed a followup inspection on October 18, 1994. No violations were noted. RL considers this item closed.</p> <p>Alleged violations included (1) failure to maintain emergency equipment in accordance with the facility contingency and emergency plan, (2) failure to maintain operating records in a manner sufficient to locate wastes within the facility, (3) failure to label containers with hazardous waste labels or in a manner to adequately identify major risks associated with the contents of the containers, and (4) failure to store containers within a compliant secondary containment system.</p> <p>The compliance letter stated that RL and WHC needed to correct these findings by March 18, 1994.</p> <p>On February 4, 1994, RL sent a letter to Ecology providing a status of the four corrective actions. RL considers the first</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							<p>two items closed. RL requested an extension to April 30, 1994, for the third item, and stated that the fourth item would be completed by March 14, 1994.</p> <p>A unit managers' meeting was held on June 1, 1994, which provided information indicating the final two items have been completed.</p> <p>On October 10, 1994, Ecology sent a letter to RL formally closing this item. The audit revealed two findings, five observations, and five BMPs.</p> <p>On September 5, 1994, DOH sent a letter to RL stating closeout of all the open items but one finding.</p> <p>RL transmitted a response to DOH on January 25, 1995. No formal acceptance has been received from DOH.</p>
Hanford (WHC/PNL)	12/17/93	CAA	Informal	Open	DOH	DOH conducted an audit of air monitoring instrumentation adequacy and calibration on June 28 - July 2, 1993. DOH believes past audits and surveillances have identified instrumentation out of calibration.	<p>Three observations and one BMP were identified. RL submitted a response to DOH on January 25, 1995. No formal acceptance has been received from DOH.</p>
Hanford (WHC)	1/07/94	CAA	Informal	Open	DOH	DOH issued a compliance letter that followed an inspection of the 242-S Evaporator and SY Tank Farm emission units on November 30 and December 1, 1993.	<p>The sections of the WAC that RL and WHC were alleged to be out of compliance with are 173-303-350(2), -350(3), and -350 (4). The compliance letter stated that contingency plans for 2715EA, 1177, 321, 384, and 284W did not incorporate the WAC requirements. Additionally, the letter stated that copies of contingency plans for 284E, 284W, and 2715EA were not kept at the Hanford Fire Department as required, and they were not on</p>
Hanford (WHC)	1/27/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter for alleged violations identified during an inspection on December 9, 1993, at the Hanford Fire Department to determine compliance with contingency plan requirements under WAC 173-303 for hazardous and/or mixed waste facilities.	

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC/PNL)	2/01/94	CAA	Informal	Open	DOH	DOH officials conducted an audit on August 23, 1993, of the 300 Area emission units.	<p>the Hanford Local Area Network (HLAN).</p> <p>The compliance letter requested corrective actions to be complete by April 15, 1994.</p> <p>On March 28, 1994, RL transmitted the response letter to Ecology. The letter presents a revised RL/WHC contingency planning program, and outlines the corrective actions RL will take by May 31, 1994, to close this item.</p> <p>WHC/RL completed corrective actions as planned according to schedule. Correspondence from Ecology in October 1994 stated that this item was closed.</p> <p>The audit resulted in three observations (now referred to as findings level IV): (1) carbon absorber units inspected (Building 340) did not have test ports or indication (tags) of efficiency test performance; (2) the electric pre-heater upstream of the main filter bank for the 340 Building was not operating to limit humidity; and (3) calibration was not indicated (tags) on gauges used to monitor performance of HEPA filters (WHC and PNL facilities). Corrective actions were included in the letter report.</p> <p>RL provided a letter to DOH on December 1, 1994, responding to the three items. Corrective actions also were provided. Another response letter containing additional requested information was sent to DOH on December 9, 1994. No formal acceptance has</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	2/23/94	RCRA	Informal	Closed	Ecology	<p>Ecology issued a compliance letter alleging violations of facility recordkeeping requirements for the Backlog Waste Program.</p> <p>The alleged violations resulted from an Ecology inspection on February 18, 1994, when Ecology requested copies of training records.</p>	<p>been received from DOH. The alleged violations are summarized below.</p> <p>1) RL and WHC "failed to make training records available for inspection...to verify that employees involved in the backlog waste program have received training..."</p> <p>2) RL and WHC "failed to make training records required by Chapter 173-303-330 WAC available for inspection at all reasonable times per Chapter 173-303-380(3[4])."</p> <p>Ecology's corrective actions stated in the "voluntary compliance letter" involve providing the requested training records to Ecology and then maintaining the appropriate training records in the 200 West Area, and keeping them available for future inspections.</p> <p>On April 14, 1994, Ecology sent a letter to RL and WHC stating that their investigation of training record accessibility for the Backlog Waste Program was completed and the issue has been closed.</p>
Hanford (RL/COE)	3/09/94	RCRA	Formal	Closed	Ecology	<p>Ecology issued an Order (No. DE 94NM-063) and Notice of Penalty incurred and due (No. DE 94NM-062) against the U.S. Army Corps of Engineers (COE) for disposing dangerous waste at the Richland Landfill, and against DOE for not providing adequate dangerous waste training to COE employees.</p>	<p>Ecology has assessed a penalty of \$9,500 against DOE and a \$6,000 penalty against COE. The fines stem from the accidental dumping of dangerous waste at the landfill as part of the cleanup activity ongoing at the North Slope. The incident occurred late in 1993.</p> <p>On April 15, 1994, Ecology sent a letter to RL and COE stating satisfaction that the</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	10/18/94	RCRA	Informal	Open	Ecology	Ecology issued a compliance letter on October 18, 1994, to RL and WHC that followed an inspection on August 3, 4, 15, and 29, 1994, at the 204-AR Waste Transfer Facility. This facility is operating as an interim status facility under a revised Part A permit.	<p>Formal notification of acceptance has not been received from DOH.</p> <p>There were three violations noted: (1) emergency procedures were not in place; (2) the contingency plan was not adequate; and (3) transfer operation procedures were inadequate. Additionally, three concerns were noted.</p> <p>RL responded to the violations in a letter dated November 21, 1994. Tank Farms is revising the procedures, and is expected to be done by May 30, 1995.</p>
Hanford (WHC)	11/03/94	CAA	Informal	Open	DOH	DOH issued a compliance letter to RL on November 3, 1994, that followed an inspection at the 200 West Tank Farms on October 19, 1994. The inspection identified three findings and one BMP.	<p>During the inspection, stack monitoring systems for five stacks in the 200 West tank farms were examined. The findings identified during the inspection are as follows: (1) paper tape on the rotometers can lead to inaccurate flow readings and inaccurate calculations in determining doses; (2) sample flow rate data for two stacks is low, which is in violation of emission monitoring procedures and could lead to under reporting emissions; and (3) several instruments were found to be out of calibration.</p> <p>Corrective actions for the findings, and a recommendation to correct the BMP, were provided in the letter, and a response was requested by December 22, 1994. On December 16, 1994, a response was provided to DOH. DOH has said they will conduct a follow-up inspection to verify compliance.</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (BHI)	11/15/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and Bechtel Hanford, Inc. (BHI), on November 15, 1994, that followed an inspection on November 3, 1994, of dangerous waste generator facilities.	<p>Three facilities were inspected and violations were identified at the 271-U 90-day accumulation area. These are as follows: (1) the spill kit did not contain all the required equipment (WAC 173-303-340); (2) the waste inventory log sheet did not correspond to the labeling on the container (WAC 173-303-210); and (3) the weekly inspection log for the facility indicated no problems were found with any safety and emergency equipment; however, safety and emergency equipment was found to be missing, damaged, or out of certification.</p> <p>Ecology provided corrective actions in the compliance letter and asked RL to provide a "certificate of compliance" indicating closure of the findings. RL transmitted a response to Ecology on January 29, 1995. RL considers this item closed.</p>
Hanford (ICF KH)	12/08/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter on December 8, 1994, to RL and ICF KH that followed an inspection on November 3, 1994, of satellite accumulation areas in the 200 East and West Areas. These areas are in support of Project W-049H.	<p>The letter alleged three violations: WAC 173-303-200(2)(a), the accumulation containers were not under the control of the operator or secured; WAC 173-303-950(2), paint materials in the buckets at the area were left to air dry, which constituted nonpermitted treatment and disposal; and WAC 173-303-145(3)(a)(ii), it did not appear that spilled materials were mitigated or prevented. Additionally, five areas of concern were noted in the letter.</p> <p>The corrective actions were to be completed within 24 hours of receipt of the letter, and Ecology requested verification be submitted to them by December 30, 1994.</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	4/07/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and WHC alleging noncompliance with WAC 173-303-330, Personnel Training.	<p>corrective items identified in the order had been completed, and approved the restart of dangerous waste management work on the North Slope. Ecology also requested in the letter that before the generation or potential generation of hazardous or mixed waste at identified past-practice waste sites, that Waste Control Plans be submitted to them for approval. Ecology stated that the "letter serves as a notice of completion of Order requirements," except for the ongoing requirements of the Waste Control Plans, and stated that the "entire case will be resolved upon payment" of the Penalty.</p> <p>The allegations followed an inspection conducted at tank farms March 17-18, 1994, to determine compliance with generator requirements. The inspector stated that at the time of the inspection, a random sample of training records was selected and that approximately half of those were found to be deficient. The action item in the letter called for RL and WHC to review the training of tank farms personnel by July 1, 1994, and to complete and document all required training.</p> <p>On June 29, 1994, RL sent Ecology a letter stating that 95 percent of the tank farms personnel had completed the required training, and that all remaining personnel would be limited to work not directly affecting dangerous waste management activities until their training was completed.</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	4/14/94	RCRA	Informal	Open	Ecology	Ecology issued a compliance letter to RL and WHC on April 14, 1994, which followed an inspection conducted on February 7-8, 1994, to assess completion of Milestones 21, 22, and 23 of the Tri-Party Agreement. The compliance letter alleged seven violations of WAC 173-303: (1) WAC 173-303-300, General Waste Analysis; (2) -380, Facility Recordkeeping; (3) -310, Security; (4) -630, Use and Management of Containers; (5) -320, General Inspection; (6) -350, Contingency Plan and Emergency Procedures; and (7) -640, Tank Systems.	<p>Ecology conducted a follow-up inspection on July 19, 1994, and indicated satisfaction with this issue and said they consider this closed.</p> <p>Ecology's concerns were centered around RCRA interim status requirements being relaxed on the facilities that were inspected, which are scheduled for closure or are undergoing a change in mission. Ecology's concerns are that relaxed management of hazardous waste during these periods may cause a threat to human health or the environment. Five corrective actions were included in the letter, three to be completed within 30 days, two within 60 days, and one within 180 days.</p> <p>On July 26, 1994, Ecology sent a letter to RL stating that four of the five items had been satisfactorily completed. The fifth item, to construct a barrier around 100-D Ponds, was discussed at the unit managers' meetings in July. Ecology stated in the letter referenced in this paragraph that the barrier was dependent on the hazard posed by contamination within the active portion of the facility. If RL/WHC can demonstrate that contamination would not occur if the area were disturbed, then the barrier requirement would be waived. Ecology states "if data can be collected, analyzed, and independently validated in a timely manner," they would consider deferring the compliance date of October 10, 1994, to construct the barrier, until the sampling and analytical results</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							were complete.
Hanford (WHC)	4/20/94	CAA	Informal	Open	DOH	DOH issued a compliance letter that followed an inspection at T Plant on March 16, 1994.	On November 4, 1994, Ecology sent a letter to RL stating that enforcement to construct a barrier would be deferred until June 5, 1995, when validated data is received. One finding and two observations were identified during the audit. An initial response was prepared but was not submitted. A new response is now being prepared by T Plant.
Hanford (WHC)	5/18/94	RCRA	Informal	Open	Ecology	Ecology issued a compliance letter to RL and WHC on May 18, 1994, that followed a dangerous waste compliance assessment of the PUREX and UO3 facilities. The assessment was conducted to "determine current compliance with interim status requirements...and to review applicability and appropriateness of requirements for currently permitted vessels, and those vessels that will be added to the PUREX Part A Permit Application." The letter identified 7 findings, 5 observations, and 11 requirements.	The letter states that "this investigation was performed under the guise of an environmental assessment rather than a compliance inspection. However, failure to correct the deficiencies may result in a compliance action pursuant to the authorities granted to Ecology by RCW-70-105." Because of this language, RL/WHC decided to handle this letter like a voluntary compliance letter.
Hanford (PNL)	8/05/94	RCRA	Informal	Closed	Ecology	Ecology issued a compliance letter to RL and PNL on August 5, 1994, that followed a dangerous waste compliance assessment of the 325 Shielded Analytical Laboratory (SAL) on April 12 and 21, 1994.	On June 27, 1994, RL issued a letter that responded to the findings, observations, and requirements. The letter's responses either disputed the findings, etc., or agreed with them and provided corrective actions with completion dates. No formal notification of closure has been received from Ecology. Four areas of noncompliance with WAC 173-303 were identified: (1) inadequate closure of containers in storage; (2) facility recordkeeping; (3) interim status permit violations; and (4) the absence of tracking dangerous waste volumes after small

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	9/02/94	CAA	Informal	Open	DOH	DOH conducted a sitewide quality assurance audit from August 15-19, 1994, which focused on the overall QA program of RL, WHC, PNL, and BHI. Four findings and two BMPs were identified.	<p>quantities of liquid wastes were mixed with large quantities of water in the RMW sewer. Corrective actions and dates for completion were provided by Ecology.</p> <p>The first two items were completed on schedule. The second two items were put on hold until after the facility was restarted, when systems were in place to fully comply with the requirements identified during the inspection. This has occurred and RL considers this closed. No formal notice of closure has been received from Ecology. DOH stated in their letter that a new category of findings, finding level IVs, would be created to replace the former category of observations, which in the past had not been responded to, and that all formerly identified observations from past audits would be changed to finding level IVs as well. The letter did not provide a date for completion of the former observations.</p> <p>On December 7, 1994, RL provided a response to DOH. This submittal did not include responses to previous audit findings. A letter of clarification committing to a January 31, 1995, response date was provided to DOH on January 9, 1995.</p> <p>On January 31, 1995, a letter was transmitted to DOH with responses to all remaining open items, with the exception of one (1992 200 East Area Tank Farms), which will be responded to in a separate transmittal.</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford, (PNL)	2/16/95	RCRA	Informal	Open	Ecology	Ecology issued a voluntary compliance letter to PNL on February 16, 1995, that followed an inspection on January 23-25, 1995, at the 324 Building's Radiochemical Engineering Cells (REC) and High-Level Vault (HLV) tanks. This inspection was conducted to support resolution of a dispute between the Tri-Parties.	<p>On December 23, 1994, RL transmitted a letter to Ecology to inform them of completion of the corrective actions. On February 8, 1995, Ecology transmitted a letter to RL closing this item.</p> <p>Facility transition negotiations that started in July 1994 have included discussions on the various compliance violations at the 324 Building. On February 7, 1995, the Dispute Resolution Committee agreed that Ecology should issue the voluntary compliance letter to document the areas of noncompliance associated with the 324 REC and HLV tanks, and to restart negotiations of the Tri-Party Agreement milestones to resolve them and close the activities that are noncompliant. The milestones, if agreed to by the three parties, will satisfy the regulatory enforcement options for the areas of noncompliance in the 324 Building.</p> <p>The five violations are as follows: (1) failure to ship waste offsite within 90 days of accumulating 55 gallons or more; (2) failure to store radioactive mixed waste in containers or tanks in accordance with WAC 173-303-200(1)(b); (3) failure to meet tank requirements in accordance with WAC 173-303-640(2) & (6); (4) failure to apply for interim status and failure to meet interim status facility standards in accordance with WAC 173-303-400; and (5) failure to prepare land disposal restriction notifications for shipments of radioactive mixed waste offsite</p>

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Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
							in accordance with WAC 173-303-140(2)(a) and 40 CFR 268.7(a)(1).
Hanford (WHC)	3/28/95	WCAA	Informal	Closed	BCCAA	The Benton County Clean Air Authority issued a Notice of Violation to WHC on March 28, 1995.	<p>On March 8, 1995, RL transmitted a response to Ecology outlining the measures RL and PNL will take to resolve the compliance issues associated with the 324 Building.</p> <p>The NOV stated WHC was in violation of WAC 173-425-070(4), which allows local air authorities to restrict conditions for burning. On February 25, 1995, burning at the 1250 Building (as a training exercise assumed by the Hanford Fire Department) continued past the time authorized by the Special Burning Permit. The NOV requires a response in 30 days.</p>
Hanford (WHC)	4/20/95	CAA	Informal	Open	DOH	On April 20, 1995, RL received a compliance letter from DOH that followed an inspection at the Waste Sampling Characterization Facility (WSCF) on April 3, 1995. The letter identified two findings.	<p>On April 24, 1995, the BCCAA transmitted a letter to WHC's Hanford Fire Department that stated further enforcement action would not be required. This item is now closed.</p> <p>The first finding was a violation of WAC 246-247-075, Quality Assurance. Two compliance air samples from an unplanned release did not contain chain of custody requirements, and correct procedures were not followed for the two samples.</p> <p>The second finding also was a violation of WAC 246-247-075. There was no air sample procedure for unplanned releases. DOH provided suggested actions the facility could take to correct the violations. The date that RL needed to respond by was not provided.</p>

Facility	Date Received	Subject	Category	Status	Agency	Summary	Comments
Hanford (WHC)	4/21/95	CAA	Informal	Open	DOH	On April 21, 1995, RL received a compliance letter from DOH that followed an inspection at T Plant on March 16, 1994. DOH stated that the inspection identified three findings, and that they needed a response from RL to close the inspection.	The information on this inspection is in an earlier entry in this report. See the DOH inspection entry for 4/20/94.
Hanford (WHC)	5/15/95	RCRA	Informal	Open	Ecology	RL and WHC received a voluntary compliance letter from Ecology on May 15, 1995, that followed Ecology's investigation into the acceptance of labpack wastes into the Central Waste Complex (CWC).	<p>Six violations of WAC 173-303 were identified as a result of the investigation. They are listed below.</p> <p>(1) Failure to confirm knowledge about a dangerous waste before treating, storing, or disposing of it (WAC 173-303-300).</p> <p>(2) Failure to provide a training program sufficient to ensure facility personnel can effectively respond to emergencies or to incorporate all dangerous waste management procedures relevant to their positions (WAC 173-303-330).</p> <p>(3) Failure to incorporate in the contingency plan actions to be taken in the event a dangerous waste shipment arrives, is not acceptable, and cannot be transported (WAC 173-303-350).</p> <p>(4) Failure to submit a written report to Ecology within 15 days that emergency action was taken (WAC 173-303-360).</p> <p>(5) Failure to note significant discrepancies in the manifest, failure to submit a letter to Ecology within 15 days describing the discrepancies, and failure to take contingency</p>

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plan actions (WAC 173-303-370).

(6) Failure to locate dangerous waste within the facility or to cross-reference wastes by specific manifest numbers.

Corrective measures and the dates to complete these measures were provided in the letter.