

Rockwell Hanford Operations
P.O. Box 800
Richland, WA 99352



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In reply, refer to letter R86-3498

Mr. R. E. Gerton, Director
Environment, Safety, and Health Division

Mr. J. D. White, Director
Waste Management Division
Department of Energy
Richland Operations Office
Richland, Washington 99352

Dear Messrs. Gerton and White:

NINETY-DAY CHEMICAL STORAGE RULE
(Contract DE-AC06-77RL01030)

Reference: Letter, March 7, 1986, T. R. Fitzsimmons to K. D. Feigner and
R. A. Burkhalter, "Regulatory Order Reports"

A report regarding compliance with the 90-day temporary storage rule of WAC-173-303-200 is provided here to assist you in responding to the second claim in the Department of Ecology (Ecology) Compliance Order No. DE-86-133. The target date of close of business on July 14, 1986, for attaining compliance with the subject rule was achieved. Details regarding documentation and the progress made in the waste processing system are provided below.

Rockwell Hanford Operations (Rockwell) has established an administrative system as described in the reference to implement compliance with waste chemical disposal. This system is being formalized in Rockwell Manual RHO-RE-MA-13. A draft of Rockwell Manual RHO-RE-MA-13 was reviewed by all contractors in March and April of this year. Comments, suggestions, and corrections have been incorporated. An update of the draft based upon the July 3, 1986 revision of the Dangerous Waste Regulations is in progress and the document is scheduled for issuance in September 1986.

The focus to improve the waste processing system is currently changing from the process of analysis of waste submitted for disposal to the identification and reduction of wastes in the generating process. A comprehensive file of Material Safety Data Sheets is being assembled to advise generators of the hazards of various materials, to reduce analysis turnaround times, and to advise generators of the most likely hazard class of their waste chemicals and containers. The last of the above stated



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items offers the greatest opportunity to improve our waste identification and minimization systems. In some cases, a chemical or mixture may qualify as a solid waste but cannot be identified as a hazardous waste without extensive chemical analysis. In like manner, a chemical or mixture may seem to qualify as a recyclable material (such as used crankcase oil), but there may be good reason that it cannot be released as such until tests (such as PCB and flashpoint tests) are performed to assure that it is neither a solid nor hazardous waste.

The Disposal Requests, Disposal Analyses, and Manifests related to the July 14, 1986 target date comprise the full set of documentation for that effort. These documents are assembled in eight three-ring binders located in Room A-119, Building 2750-E, in the 200 East Area, and may be inspected at your convenience.

If you require further information concerning this subject, please contact Mr. T. B. Veneziano on 373-4216 or Ms. L. L. Powers on 373-4981.

Very truly yours,

J. F. Albaugh, Director
Safety and Quality Assurance

T. B. Veneziano, Program Manager
Environmental Control Programs

TBV:DRG:jmc

Att.

cc: P. E. Rasmussen - DOE-RL