



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 Swift Boulevard, Suite 5
Richland, Washington 99352

0051582

July 26, 1999



Mr. Jeff Bruggeman
U.S. Department of Energy
PO Box 550
Richland, WA 99352

Re: Department of Health Findings from Biannual Inspection

Dear Mr. Bruggeman:

The Washington State Department of Health has provided its findings from its biannual inspection of minor emission units to the U.S. Environmental Protection Agency. The units inspected on June 8 and 9, 1999 include 291-U-1 from the U-Plant, and 296-S-7E and 296-S-7W from the 233-S Facility.

Enclosed are the findings of the Department of Health. The U.S. Environmental Protection Agency concurs with the Department of Health and looks forward to your response to the inspection findings. Please call me at (509) 376-8665 if you have any questions.

Sincerely,

Craig E. Cameron
Hanford Project Office

Enclosure

cc: Administrative Record - (Redox 233-S)



File-DOH
Craig

AIR 99-712

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF RADIATION PROTECTION
7171 Cleanwater Lane, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827
TDD Relay 1-800-833-6388

July 14, 1999

Mr. Doug Sherwood
U S Environmental Protection Agency
Region 10
712 Swift Boulevard
Suite 5
Richland, Washington 99352

Dear Mr. Sherwood:

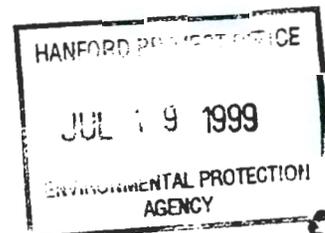
The Department of Health conducted an inspection at CERCLA sites 233-S and U-plant (291-U-1, 296-S-7E and 296-S-7W) Facilities from June 8 through June 9, 1999. The inspection is part of the biannual inspection schedule the Department of Health conducts on minor emission units at the Hanford site. The inspection included a physical walkdown of the stack, monitoring cabinets, and the HEPA filter housing. The department also reviewed chain-of-custody records, air sample records, and HEPA filter records.

Craig Cameron and Pam Innis of your staff were included on the inspection team and were present for the walkdown of the emission units. During the inspection the following issues were identified as compliance concerns and the prime contractor Bechtel committed to addressing these concerns immediately.

The following item was identified to the owner/operator of the emission unit:

- ◆ During the walkdown of the emission units and review of paper work that several injection and sampling test ports for the HEPA filter in-place aerosol tests were not labeled.

Status: A work package was initiated to replace all any missing HEPA filter aerosol test port labels. This will be completed by December 31, 1999.



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During the inspection the following observations were noted and identified as best management practices:

- ◆ Currently record air samples not composited for isotopic analysis can be discarded July 1st following the year they were collected. The annual Air Emissions Report is submitted to the department by June 30 for the previous years emissions as required by WAC 246-247-080(f). This time frame does not allow the department sufficient time to review the data prior to the disposition of the samples. If there are any questions, we cannot request reanalysis if the sample is in question.

Recommendation: The Department of Health would like to see this issue addressed sitewide at all laboratories analyzing record air samples. The time frame for holding actual air samples needs to be extended. Holding air samples for one year after the annual air emissions report is submitted to the department will give the department the appropriate time frame necessary.

If you have any questions, please contact me at (360) 236-3261, or Johanna Berkey at (509) 377-3829, or Cindy Grant at (360) 236-3266 of my staff.

Sincerely,



Allen W. Conklin, Manager
Air Emissions and Defense Waste Section
Division of Radiation Protection

AWC/CG/JB/jr

cc: Art Ingle, DOE-RL
John Bates, FDH
Steve Szendre, FDH
Steve Alexander, Ecology
Gerald Leitch, EPA