ORIGINAL 0031538

Date Received: 9-7-93 CW	INFORMATION RELEASE REQUEST	Reference: WHC-CM-3-4

Complete for all Types of Release

Purpose

- [ ] Speech or Presentation (Check only one suffix)
  - [ ] Full Paper
  - [ ] Summary
  - [ ] Abstract
  - [ ] Visual Aid
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- [ ] Poster Session
- [ ] Videotape
- [X] Reference
- [ ] Technical Report
- [ ] Thesis or Dissertation
- [ ] Manual
- [ ] Brochure/Flier
- [ ] Software/Database
- [ ] Controlled Document
- [X] Other DOH 93-024

ID Number (include revision, volume, etc.): REG-0109

List attachments: SEE ATTACHED

Date Release Required:

Title: DEPARTMENT OF HEALTH INSPECTION (CINDY GRANT) 6/28/93 - 7/1/93

Unclassified Category: UC-

Impact Level:

New or novel (patentable) subject matter? [X] No [ ] Yes
If "Yes", has disclosure been submitted by WHC or other company? [X] No [ ] Yes Disclosure No(s).

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Group or Society Sponsoring: N/A

Date(s) of Conference or Meeting: N/A

City/State: N/A

Will proceedings be published? [ ] Yes [X] No
Will material be handed out? [ ] Yes [X] No

Title of Journal: N/A

CHECKLIST FOR SIGNATORIES

Review Required per WHC-CM-3-4	Yes	No	Reviewer - Signature Indicates Approval: Name (printed) / Signature / Date
Classification/Unclassified Controlled Nuclear Information	[ ]	[X]	
Patent - General Counsel	[~~X~~ CW]	[~~X~~]	Per OGC Memo dated 2-4-93
Legal - General Counsel	[~~X~~ CW]	[~~X~~]	
Applied Technology/Export Controlled Information or International Program	[ ]	[X]	
WHC Program/Project	[X]	[ ]	D. FARWICK Steve Szendre for Telecon 9:00 6/29/93
Communications	[ ]	[X]	
RL Program/Project	[X]	[ ]	S.D. Stites S D Stites 6-29-93
Publication Services	[ ]	[X]	
Other Program/Project	[ ]	[X]	

Information conforms to all applicable requirements. The above information is certified to be correct.

	Yes	No
References Available to Intended Audience	[ ]	[X]
Transmit to DOE-HQ/Office of Scientific and Technical Information	[ ]	[X]

Author/Requester (Printed/Signature) Date
Steve Szendre
STEVE SZENDRE 6/30/93

Intended Audience
[ ] Internal [ ] Sponsor [X] External

Responsible Manager (Printed/Signature) Date
E.M. GREAGER Eric M. Greager 6/30/93

INFORMATION RELEASE ADMINISTRATION APPROVAL STAMP

Stamp is required before release. Release is contingent upon resolution of mandatory comments.

APPROVED FOR RELEASE OFFICIAL DOCUMENT CW Date 7-7-93

OCT 1993 RECEIVED EDMC

Date Cancelled | Date Disapproved

ORIGINAL REG-0109
ID Number

Lead Author	Phone	MSIN	Other Author(s) or Requestor
STEVE SZENDRE	6-7776	H6-30	
Project or Program	Lead Org Code		Sponsor Agency (DOE, DOT, NRC, USGS, etc.)
	88410		
Editor	Phone	MSIN	DOE/HQ Program (DP, EH, EM, NE, etc.)

Mandatory Comments (Only mandatory comments are to be documented. All other comments should be made on a copy of the information submitted for review and returned to the author.)	Reviewer Name & Signature	Date	Resolution	Reviewer Name & Signature	Date

Legends/Notices/Markings (required per WHC-CM-3-4 or guidance organization.) (Reviewer initials)

	Affix Yes	Affix No		Affix Yes	Affix No
Applied Technology	[ ]	[ ]	Predecisional Information	[ ]	[ ]
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Limited Disclosure	[ ]	[ ]	Unclassified Controlled Nuclear Information/Official Use Only	[ ]	[ ]
Patent Status	[ ]	[ ]			

Responsible Manager (Printed/Signature)

Additional Information

REG-0109

ATTACHMENT FOR
DEPARTMENT OF HEALTH
93-024

1. COURSE COMPLETION ROSTER - QA OVERSIGHT WHC NESHAPs QA PROGRAM 4/22/93, 4/30/93.

2. WHC INSPECTION/SURVEILLANCE REPORT - ISR NUMBER: E93 - 123. 4/15/93

3. WHC INSPECTION/SURVEILLANCE REPORT - ISR NUMBER: EAQA 93-026. 3/30/93

4. QUARTERLY SURVEILLANCE SCHEDULE THIRD QUARTER, FY 1993. PAGE 5 & 6 OF 7. 38610-93-009

5. FY-93 ECA AUDIT/APPRAISAL SCHEDULE MARCH 4, 1993.

6. EQA SURVEILLANCES 6/25/93.

7. cc:MAIL FROM LARRY P. DIEDIKER TO DONALD D.VOLKMAN, LADELL W. VANCE, RE: WHC-EP-0536 UPDATING.

8. NESHAPS TRAINING

COURSE COMPLETION ROSTER

Records Use Only

PLEASE TYPE OR PRINT ALL ENTRIES (EXCEPT SIGNATURES) IN BLACK BALL-POINT PEN
The following personnel have attended the course as documented.

Course Number	Course Title	Date Completed	Date Expires
	QA Oversight WHC NESHAPs QA Program	4/22/93	

	Last Name (Print)	Initials	Payroll No.	Employee Signature	Company if not WHC/BCSR	Supervisor
0	EXAMPLE Doe	J.D.	8XXXX		N/A	J.R. Smith
1	Cochrane	MS	57329	MS Cochrane		Steve Smith
2	Volkman	DD	64782	D A Volkman		S.T. Smith
3	WARN	MJ	6C057	M J Warn		D.G. FARWCK
4	BRISBIN	SA	80885	SA Brisbin		D.G. FARWICK
5	GARRITY	MA	57579	Melanie Garrity		DG FARWICK
6	McCallum	JR	81792	JR McCallum		TL Bennington
7	Vance	LW	56423	L W. Vance		D.G. Farwick
8	SMITH	ST	63741	ST Smith		AJ FISHER
9	HAND	CL	81490	C J Hand		T L BANNINGTON
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						

Comments: _____

Authorized Authenticator (Print/Type)	MSIN	Telephone

Authorized Authenticator (Signature)

Distribution: White and Canary – Training Records, H0-10 Pink – Authorized Authenticator

COURSE COMPLETION ROSTER

Records Use Only

PLEASE TYPE OR PRINT ALL ENTRIES (EXCEPT SIGNATURES) IN BLACK BALL-POINT PEN
The following personnel have attended the course as documented.

Course Number	Course Title	Date Completed	Date Expires
	QA OVERSIGHT WHC NESHAPS QA PROGRAM	4/30/93	

	Last Name (Print)	Initials	Payroll No.	Employee Signature	Company if not WHC/BCSR	Supervisor
0	EXAMPLE Doe	J.D.	8XXXX		N/A	J.R. Smith
1	SERADIA	EF	66343	Earl A. Peradia		CL. VOLKMAN
2	VOLKMAN	TN	64324	TN Volkman		VL WAGNER
3	SMITH	DW	81462	DW Smith		J N Nansen
4	GOULET	JM	83663	John Goulet		M.S. COCHRANE
5	~~GRAY~~	~~P.A.~~	~~97218~~			
6	Tittle	JA	6C8667	JA Tittle		G DAVIS
7	~~Chapman~~	~~GW~~	~~8458~~			
8	MALHAN	R	82653	Rajiv Malhan		C.N. Hogan
9	Fouad	H	82569	Hussein Fouad		C.N. Hogan.
10						
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15						
16						
17						
18						
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Comments: _____

Authorized Authenticator (Print/Type)	MSIN	Telephone

Authorized Authenticator (Signature)

Distribution: White and Canary – Training Records, H0-10 Pink – Authorized Authenticator

54-6400-063 (03/88)

COURSE COMPLETION ROSTER

Records Use Only

PLEASE TYPE OR PRINT ALL ENTRIES (EXCEPT SIGNATURES) IN BLACK BALL-POINT PEN
The following personnel have attended the course as documented.

Course Number	Course Title	Date Completed	Date Expires
	QA Oversight WHC NESHAPs QA Program	4/30/93	

	Last Name (Print)	Initials	Payroll No.	Employee Signature	Company if not WHC/BCSR	Supervisor
0	EXAMPLE Doe	J.D.	8XXXX		N/A	J.R. Smith
1	Carpenter	C. A.	-A	Carpenter		J N Nansen
2	Clapperton	C. W.	84545	CW Clapperton		JA Rivera
3	Gordon	L. L.	6B739	LR Gordon		MS COCHRANE
4	Goulet	J. M.				
5	Gray	P. A.	97218	Paula Gray		J.E. PARKER
6	Hoover	C. R.	64793	CR Hoover		J.N. NANSEN
7	Leonard	D. J.				
8	McGhan	M. A.	57312	Mark McGhan		J N Nansen
9	Mischke	S. L.	94295	SL Mischke		JE Parker
10	Plastino	J. C.	57549	JC Plastino		GM DAVIS
11	Ranade	D. G.	82772	DG Ranade		J.A. Rivera
12	Smith	D. W.	81462	DW Smith		J N Nansen
13	Suydam	C. D.	84652	CD Suydam		D.C. Board
14	Tittle	J. A.				
15	Vaile	J. E.	67511	JE Vaile		G. DAVIS
16	Volkman	T. J.				
17	Wingfield	M. C.	84610	MC Wingfield		J.L. Logston
18	Tuell	A. C.	6B798	AC Tuell		JL LOGSTON
19	Sickles	J. F.	81542	James F. Sickles		C.M. Hogan
20	Fouad	H. Y.	82569	Hussein Fouad		C.N. Hogan

Comments: _____

Authorized Authenticator (Print/Type)	MSIN	Telephone

Authorized Authenticator (Signature)

Distribution: White and Canary – Training Records, H0-10 Pink – Authorized Authenticator

WESTINGHOUSE HANFORD COMPANY INSPECTION/SURVEILLANCE REPORT

Section 1 - Initiation

[x] Response [ ] Corrected [ ] Information

Date Initiated: 4-15-93

Copies To:	* S.M. Albertin	S5-60	* W.E. Moore II	S5-60
	* R.W. Berk	S5-60	* S.T. Smith	H4-25
	* D.G. Farwick	H4-16	* L.W. Vance	H4-16
	* A.J. Fisher	R2-56	* M.J. Warn	H4-16
	K.W. Gray	S5-66	* C.D. Wollam	S6-19
	* J.C. Midgett	S6-15	* QUEST	L4-86
	* R.R. Moerman	B5-20	EQA/File	H4-16

*** CC:Mail**

Subject: PUREX Main Stack (291-A1) Effluent Record Sampling. NESHAPS Compliance.
System: N/A **Equipment Number:** N/A
Location: PUREX, 200E **Survey Item:** N/A
Reference:

Initiated By: M.J. Warn/L.W. Vance **Organization Code:** 38610

M J Warn 4-20-93 K D Farwick 4/21/93
Signature Date Concur Date

Response Requested: [ ] No [x] Yes,
Organization Code: 33930
By: 5-3-93

QUEST Trending Code: AD-04, PN-002

Priority Planning Grid (PPG) Value: TBD by respondent.

Reference Documents
ISR: N/A NCR: N/A CAR: N/A Hold Tag: N/A

Person Contacted: W.E. Moore II, S.M. Albertin, R.W. Berk.
Surveillance Checklist Attached: Yes [x] No [ ]
Checklist Name: N/A
Number of Checklist Pages: 2

Report: Background. The Facility Effluent Monitoring Plan (FEMP) for the Plutonium-Uranium Extraction Facility (WHC-EP-0468) requires that routine sampling and analysis of gaseous emissions from stack 291-A-1 shall be conducted to ensure compliance with NESHAPS.

Reference documents:

- FEMP WHC-EP-0468
- HP Procedures-PUREX Stack (291-A1) Effluent Record Sampling and Monitoring. WHC-CM-4-13, Section 5.2.2.20, Rev 0.
- 40CFR61, Appendix B, Method 114, Section 4.
- WHC-CM-4-13, OHP Procedures, 2.1.6 Air Sample Envelopes.

This surveillance was performed to evaluate the effectiveness of implementation of existing procedures which control PUREX Stack (291-A1) record sampling activities.

An activity noted during the surveillance was the attachment,by the HPT, of 'Radioactive Material' magenta trefoil labels and 'Health/Flammability/Reactivity' decals to the sample packages. The use of these items exceeded the requirements of the existing procedures and must be considered a significant worker safety enhancement.

Items 1e and 1g are UNSATISFACTORY, a response is required.
All other items are SATISFACTORY.

Section 2 - Response

Responder: _____ Date _____

Response Evaluation

Evaluation of Response: [ ] Acceptable [ ] Unacceptable (explain below)

Comments:

Evaluated By: **Date:**

Follow-up/Closure Verification Results: **[ ] Acceptable**
[ ] Unacceptable (explain below)

Additional Verfication Required: [ ] No [ ] Yes, _____
(identify new document)

Closed By:

_____ _____

Initiator **Date**

SUBJECT/ACTIVITY	PERSONNEL CONTACTED/EVIDENCE EXAMINED	OBSERVATIONS/COMMENTS	COMPLY	
			YES	NO
1.Reference: HP Procedure Manual WHC-CM-4-13, Section 5.2.2.20, Rev 0. Purex Main Stack (291-A1) Effluent Record Sampling and Monitoring.	------	-------		
1a. Verify that the HPT is familiar with the Procedures prior to initiating sample exchange.	W.E. Moore II	The HPT demonstrated an in depth knowledge of the applicable procedures and worked to a pre-determined plan.	x	
1b. Verify that the 4" air sample filters and the silver zeolite cartridges are correctly prepared/identified prior to insertion in the filter holders.	W.E. Moore II	It was noted that, in every instance, preparation of the replacement 4" air sample filters and filter cartridges included addition of the EDP number,date and approximate Time "ON".	x	
1c. Verify that the "used" silver zeolite cartridges are wrapped in plastic sample bags and placed in the identified white envelopes.	W.E. Moore II	Observed that the "used" silver zeolite cartridges were wrapped in Ziplock bags and inserted into white sample envelopes,which had been identified in accordance with OHP Manual WHC-CM-4-13, Procedure 2.1.6.	x	
1d. Verify that the removed 4" air sample filters are correctly packaged and identified prior to conveyance to the PUREX HP office.	W.E. Moore II	Observed that the 4" air sample filters were inserted into white sample envelopes,which had been identified in accordance with OHP Manual WHC-CM-4-13, Procedure 2.1.6, prior to conveyance to PUREX HP office.	x	
1e. Verify that the record sample exchange is documented in the HP Field Log Book in the 292-AB building.	W.E. Moore II	There was no HP Field Log Book resident in the 292-AB building.		x

E93-123
Pg. 4 of 5

1f. Verify that the record sample exchange is documented in the PUREX HP Office.	W.E. Moore II	Observed that all relevant record sample data was entered into the Log Book located in the PUREX HP office.	x	
1g. Verify that a chain of custody document(COC)is attached to the record samples prior to delivery to 222-S laboratories.	R.W. Berk.	It was noted that a Chain of Custody (COC) document was not prepared for these samples.		x

WESTINGHOUSE HANFORD COMPANY
INSPECTION/SURVEILLANCE REPORT

SECTION 1 - INITIATION

[X] RESPONSE [ ] CORRECTED [ ] INFORMATION

DATE INITIATED: 3-30-93

COPIES TO:

L.D. Berneski	L6-40	C.A. Carpenter	L6-35	H.L. Dawson	L4-86
D.R. Ekstrom	L6-52	D.G. Farwick	H4-16	G.W. Faulk	T3-28
J.L. Gilbert	L6-40	C.R. Hoover	L6-35	H.T. Miller	L6-40
J.N. Nansen	L6-35	J.A. Peltier	S1-51	D.W. Smith	L6-35
R.L. Watts	L6-52	Eng. Files	L6-35	Central Files	L8-04

* = cc:Mail

SUBJECT: Radioactive Air Emissions Control - 340 Bldg (WESHAPS)

SYSTEM: N/A **EQUIPMENT NO.:** N/A
LOCATION: 300 Area / 340 Bldg. **SURVEY ITEM:** N/A
REFERENCE: WHC-P-0692, Section 5.2.3.1 Rev.1 Figure 1; 40 CFR 61, App. B Method 114 Section 4; WHC-EP-0536; Task # J-W005

INITIATED BY: M.A. McGhan **ORGANIZATION:** EAQA

SIGNATURE 4-5-93 DATE CONCUR J.N. Nansen 4-5-93 DATE

RESPONSE REQUESTED FROM:	ORGANIZATION:	BY:
R.L. Watts	33100	4-16-93

QST TRENDING CODE: AD-04-004; PN-002

PRIORITY PLANNING GRID (PPG):

REFERENCE DOCUMENTS

ISR: E92-418 **NCR:** N/A **CAR:** N/A **HOLD TAG:** N/A

PERSON CONTACTED: H.T. Miller

SURVEILLANCE CHECKLIST ATTACHED: YES [X]
NO []

CHECKLIST NAME: 340 Air Sampling

NUMBER OF CHECKLIST PAGES: 2

REPORT:

A surveillance was performed to verify compliance that the samples taken were done as required per the above referenced documents. The following observations were noted. As per WHC-IP-0692 sec. 6.1 note, the HP did not complete the "Weekly Stack Filter Change Form" at the time of the filter change, and the vacuum was not turned off prior to filter removal as required per 6.2.A. There is no documentation of specific preservation method as required per 40 CFR PT. 61, App. B Meth. 114 sec. 4.6 . The following items were observed but were noted on previous surveillances. No sample tracking form was used as required per 40 CFR PT. 61, App. B Meth. 114 sec. 4.6, this was noted on previous surveillance E92-418. No means to identify analysis to be performed as required per 40 CFR PT. 61, App. B Meth.114 sec. 4.6, this was noted on previous surveillance E92-363.

==========

SECTION 2 - RESPONSE

RESPONDER: R.L. Watts DATE

CLOSEOUT STATEMENT

CLOSED BY:

INITIATOR: M.A. McGhan DATE

SURVEILLANCE CHECKLIST

Surv. No.: EAQA 93-026 Title: 340 Air Sampling Point of Contact: Tom Miller

Date: 03-30-93 Prepared By: L. W. Vance & D. W. Smith Performed By: M.A. McGhan

Item	Surveillance Activities	References	Sat	Unsat	Observations
1.	Sampling Procedures	WHC-IP-0692, Sec. 5.2.3.1, Fig. 1		X	1. HPT didn't use "Weekly Stack Filter Change Form" as per 6.1 NOTE. 2. Vacuum not turned off as per 6.2 .
1a.	Is this form properly completed?			X	Form not used at time of filter change.
	Is the following information available:	40CFR61, App. B, Method 114, Sec. 4			
2.	Procedures and forms for recording exact location and considerations associated with sample acquisition?		X		WHC-EP-0536 and Task sheet J-W005
2a.	Documentation of specific sample preservation method?			X	None available
2b.	Sample labels that include: sample description, plant, location, date, time, media, sample type, sampler, sample identification, and laboratory?		X		EDP codes 340-1, 340-2, 340-3 identified on filters.
2c.	Tracking forms that include: sample number, sampler, and who has controlled sample?			X	No chain of custody form. Noted on previous surveillance E92-179
2d.	Means to identify analysis to be performed?			X	No WO available. Noted on previous surveillance E92-363

Surv. No.: EAQA 93-026 Title: 340 Air Sampling

Item	Surveillance Activities	References	Sat	Unsat	Observations
3.	Sampling Procedures	WHC-IP-0692, Sec. 2.1.6	X		
2a.	Has the white envelope been properly completed in accordance with this procedure?		X		

Environmental Services Quality Assurance

Quarterly Surveillance Schedule

Dana **Name:** LaDell Vance | **Quarter:** Third Quarter, FY 1993

Date (Month)	Area/Group to be Surveilled	Topic of surveillance
April	E.E.M.	Update of QAPjP for Radioactive Airborne Emissions Data Compilation & Reporting- Section 2.3 pg.2-3.
April	Purex	Implementation of Air Capacity & Distribution Tests.
April	Purex	291-A Stack Air Monitoring.
May	Purex	Implementation of OHP Procedures.
May	Purex	Air Sampling Instrumentation Calibration Procedures.
June	PFP	291-Z-1 Stack Air Monitoring.
June	E.E.M.	QAPjP Data Verification Procedures, Section 10.2, Pg.10-2.
June	Tank Farm	241-AP Tank Exhaust Equipment Procedures.

Environmental Services Quality Assurance

Quarterly Surveillance Schedule

Doug

Name: Malcolm Warn **Quarter:** Third Quarter, FY 1993

Date (Month)	Area/Group to be Surveilled	Topic of surveillance
April	Purex	Airflow Capacity Tests. (Procedures.)
April	Purex	Implementation of Air Capacity & Distribution Tests.
April	Purex	291-A Stack Air Monitoring.
May	Purex	Implementation of OHP Procedures.
May	Purex	Air Sampling Instrumentation Calibration Procedures.
June	PFP	291-Z-1 Stack Air Monitoring.
June	PFP	Implementation of OHP Procedures.
June	PFP	Air Sampling Calibration Equipment Procedures.

Audit/ Appraisal #	Auditee/Appraisee	Audit/Appraisal Topic	Scheduled Date	Start Date/ Entrance	Date Report Issued	Date Closed	Audit/ Appraisal Team
IAA-93-0005	ERRA Operable	Operable Units	03/02/93	03/01/93			**BURNETT**, BLAIR
EFA-93-0010	WHC	Groundwater Facilities and Services	03/29/93	03/29/93			**RANADE**, KAMBERG, CLAPPERTON
EVA-93-000	Activated Carbon Recycling, Primary Contractor Follow-up Audit	Hazardous Waste/PCB Management	04/00/93				**SCHANKE**, DUFFIELD
EAU-93-000	HWVP Fluor Daniel	Environmental Compliance Preconstruction Planning	04/00/93				**SCHANKE**,
EVA-93-000	Solvent Recovery, Primary Facility, Pre-Award Survey (Safety Kleen)	Hazardous Waste Management	04/00/93				**SCHANKE**, DUFFIELD
EFA-93-0008	WHC	Environmental Radiation Monitoring	04/06/93				**BLAIR**, WEINGARDT
EFA-93-0007	WHC	Dangerous Waste Disposal	04/09/93	04/09/93			**RANADE**, CLAPPERTON
EAU-93-0004	Central Landfill	Compliance with Applicable State Regulations	04/15/93				**KAMBERG**, COLLINS
IAA-93-0007	PFP	NESHAP	04/15/93				**RANADE**, KAMBERG

* **Bold** type denotes ECA lead auditor

Audit/ Appraisal #	Auditee/Appraisee	Audit/Appraisal Topic	Scheduled Date	Start Date/ Entrance	Date Report Issued	Date Closed	Audit/ Appraisal Team
EVA-93-000	RCRA Waste Disposal,(BULK) Primary Contractor Pre-Award Survey	Hazardous Waste/PCB Management	08/00/93				SCHANKE, DUFFIELD
IAA-93-0012	Environmental NESHAPS	Air Emissions	08/02/93				*RANADE IAA Team Leader,* KAMBERG, SUB-TEAM LEADER CLAPPERTON
IAA-93-0011	Labs	Waste Management Regulated Substances Control	08/02/93				*WEINGARDT IAA Team Leader,* PITKOFF, SUB-TEAM LEADER
IAA-93-0010	PUREX/UO_3	Hazardous Waste Management	08/02/93				BLAIR,
EAU-93-0006	Fire Department	PCB Transformer Fire Registration/Hazardous Waste Management	08/02/93				DUFFIELD, KAMBERG
IAA-93-0013	B Plant/WESF	Dangerous Waste Management	08/13/93				BALTHAZOR, CLAPPERTON

* Bold type denotes ECA lead auditor

FY-93 AUDIT/APPRAISAL SCHEDULE

Team Leaders and Status

1-OA 2-HSA 3-Emerg. Prep. 4-ECU

Keys	Task Name	Resources	Notes
***	____Waste Tank Remed Division	4-Atencio	(1992) Scheduled 9/15
***	____Asbestos	4-Ranada	(1992) Entrance 9/18
***	____Pesticides/Herbicides	4-Ranada	(1992) Entrance 9/18
***	____Toxic Substances	4-Ranada	(1992) Entrance 9/18
***	24 305/333	L2-Burstad, 3-Carpente	(1992) Entrance 9/10
***	23 PUREX/UO3	L2(Turner), 1-Hendrick, 3-Carpente, 4-Ranada	(1992) Entrance 9/6
***	____Environmental	1-Akerman	(1992) Entrance 9/8
***	21 HNUP UEDC	L1-Omel, 4-Schenke	(1992) Exit 9/18
***	20 B-Plant/WESF	L2(Cooper), 1-Dell, 3-Haugin, 4-Duffield	(1992) Exit 9/24
***	____Laundry Facility	2-White	(1992) Scheduled 9/10
***	____OA Oversight of Environ	1-Camp	(1992) Exit 09/03/92
***	18 200 Areas Labs	L4-Blair, 1-McNaught, 3-Sutton	(1992) Exit 09/03/92
***	____Annual Rad Protection	2-Smoot	Scheduled 10/15/92
01	____EFA-01 Groundwater Resource	4-Schenke	10/06/92 - Scheduled
02	____EFA-02 Environ Rad Liquid	4-Ranada	10/10/92 - Scheduled
03	____Engineer Application	1-Camp	10/12/92 - Scheduled
04	____Wrap Project	1-Hendrick	10/26/92 - Scheduled
05	____EAU-04 Central Landfill	4-Blair	11/16/92 - Scheduled
06	____OA Oversight	1-Akerman	11/30/92 - Scheduled
07	01 Environmental OSM	L1-Omel, 4-Corcoran	12/01/92 - Scheduled
08	____EFA-03 Rad Air Emission	4-Ranada	12/08/92 - Scheduled
09	____EAU-05 Liq Effluent/242/Ler	4-Burnett	12/15/92 - Scheduled
10	____EFA-04 Environ Rad Sample	4-Ranada	01/12/93 - Scheduled
11	02 100 Area/KE/KW/N	L2-Skinner, 4-Duffield, 3-Shay	01/18/93 - Scheduled
12	____HNUP Waste Qualification	1-Hendrick	01/18/93 - Scheduled
13	____EAU-07 Powerhouses 200/300A	4-Blair	01/21/93 - Scheduled
14	____Corrective Action/Procure	1-Armstron	02/01/93 - Scheduled
15	____EFA-05 Underground Storage	4-Corcoran	02/09/93 - Scheduled
16	03 FFTF	L2-Pegler, 1-Camp, 4-Balthazr, 3-Faulk	02/10/93 - Scheduled
17	04 Hazardous Materials & Shi	L1-McNaugh, 2-Martin	03/02/93 - Scheduled
18	05 Environmental Operable Uni	L1-Hansen, 2-HSA, 4-Burnett	03/02/93 - Scheduled
19	____EFA-06 Haz Wst Treatment	4-Corcoran	03/09/93 - Scheduled
20	____EFA-07 SPCC	4-Duffield	04/06/93 - Scheduled
21	06 308/TRIGA	L2-Krejci, 3-Hammons	04/15/93 - Scheduled
22	07 PFP	L2-Faulk, 1-Dell, 4-Corcoran, 3-Lovejoy	04/15/93 - Scheduled
23	____EAU-09 OSS Shops/200/Fab	4-Ranada	05/03/93 - Scheduled
24	____OA Oversight HSA	1-Hendrick	05/03/93 - Scheduled
25	____EFA-08 Haz Wst Storage	4-Schenke	05/11/93 - Scheduled
26	08 Surplus Facilities D & D	L4-Balthaz, 1-Camp	05/17/92 - Scheduled
27	____Kaiser	L1-Omel	06/01/93 - Scheduled
28*	09 T-Plant, Solid Wst Mgmt,	L4-Corcora, 1-Armstron, 2-Martin, 3-Sutton	06/01/93 - Scheduled
29	____EFA-09 Groundwater Fac Serv	4-Collins	06/08/93 - Scheduled
30	____306E	2-Krejci	06/17/93 - Scheduled
31	____EAU-11 Septic Systems	4-Collins	07/06/93 - Scheduled
32	____EFA-10 Non-Haz Solid Wst	4-Kamberg	07/07/93 - Scheduled
33	____OA Oversight ECU/Em Prep	1-Dell	07/12/93 - Scheduled
34	10 PUREX/UO3	L2-Skinner, 4-Blair, 3-Carpente	08/02/93 - Scheduled
35	____Corrective Action	1-Camp	08/02/93 - Scheduled
36	11 Labs - All Areas	L4-Collins, 3-McMurray, 1-Hendrick	08/02/93 - Scheduled
37	12 Environmental NESHAPS/TEMP	L4-Kamberg, 1-McNaught	08/02/93 - Scheduled
38	____Ann Radiation Protect/RPP	2-Monroe	08/03/93 - Scheduled
39	____EFA-11 Haz Wst Disposal	4-Atencio	08/06/93 - Scheduled
40	13 B-Plant/WESF	L2-Bright, 4-Corcoran, 3-Brown	08/13/93 - Scheduled
41*	14 Waste Tank Remediation	L1-Hansen, 2-Thomas, 4-Balthazr, 3-Boates	09/06/93 - Scheduled
42	15 315/333	L2-Krejci, 3-Haugin	09/10/93 - Scheduled
43	____Nuclear Materials/Account	1-Armstron	09/13/93 - Scheduled
44	16 HNUP - BHC	L1-Contrac, 2-Bright	09/13/93 - Scheduled
45	17 616 NW Storage Facility	L4-Atencio, 3-Bechtel	TBD

09/29/92

28* - This will include the 340 Facility, TRUSAF

41* - This will include Tanks, Grout, and Ponds/Cribs/Ditches

* carry-over Audits/Appraisals from FY-92 Schedule

EQA Surveillances

ISR #	Date Perfd.	Subject	Project	Surveillant	Status (S,U,C)	Respondant	Closed	Primary Code	Sub-Code
E92-309	10/26/92	Verification of Corrective Action	222-S	Smith	U	M. L. Bell	04/05/93	A	10b
E92-310	10/26/92	Verification of Corrective Action	222-S	Smith	U	M. L. Bell	/ /	A	10b
E92-311	10/25/92	Verification of Corrective Action	222-S	Smith	S		10/27/92	A	10b
E92-312	10/25/92	Verification of Corrective Action	222-S	Smith	S		10/27/92	A	10b
E92-313	10/25/92	Verification of Corrective Action	222-S	Smith	S		10/27/92	A	10b
E92-325	10/30/92	Internal QC Check - Sample Analysis	222-S	Hendricksen	S		10/30/92	A	2g
E92-326	10/19/92	Corrective Action Verification	222-S	Hendricksen	S		10/30/92	A	10b
E92-327	10/28/92	Conduct of Operations	222-S	Langford	S		10/28/92	A	1d
E92-328	10/20/92	Corrective Action Verification	222-S	Hendricksen	S		10/20/92	A	10b
E92-331	10/05/92	Calibration	222-S	Hendricksen	S		10/05/92	A	7c
E92-334	10/26/92	QA Reports to Management	222-S	Hendricksen	S		10/26/92	A	1a
E92-335	11/04/92	Verification of Corrective Action	222-S	Hendricksen	S		11/04/92	A	10b
E92-319	10/23/92	By-passed Inspections of DOT Drums	222-S	Smith	U	M. L. Martin	01/06/93	A	13b
E92-340	10/22/92	Corrective Action Verification	222-S	Hendricksen	U	J. G. Kristofzski	01/27/93	A	10b
E92-341	11/03/92	Corrective Action Verification	222-S	Hendricksen	S		11/03/92	A	10b
E92-345	11/03/92	Corrective Action Verification	222-S	Hendricksen	S		11/03/92	A	10b
E92-346	11/16/92	Training/Qualifications	222-S	Langford	S		11/16/92	A	9
E92-349	11/16/92	Analytical Procedures	222-S	Hendricksen	S		11/16/92	A	1a
E92-350	11/11/92	Corrective Action Verification	222-S	Hendricksen	S		11/11/92	A	10b
E92-353	11/23/92	Corrective Action Verification	222-S	Smith	S		11/23/92	A	10b
E92-357	11/17/92	Verification of Analysis	222-S	Langford	S		11/17/92	A	2g
E92-360	11/23/92	Records Control	222-S	Langford	S		11/23/92	A	6
E92-364	11/12/92	Sample Control	222-S	Langford	S		11/12/92	A	2g
E92-368	11/25/92	Personnel Qualification	222-S	Hendricksen	U	M. L. Bell	/ /	A	9
E92-369	12/01/92	Corrective Action Verification	222-S	Hendricksen	S		12/01/92	A	10b
E92-370	12/01/92	Corrective Action Verification	222-S	Hendricksen	S		12/01/92	A	10b
E92-380	12/01/92	Corrective Action Verification	222-S	Langford	S		12/01/92	A	10b
E92-390	12/09/92	Training/Qualification	222-S	Langford	C		12/09/92	A	9
E92-395	11/23/92	Corrective Action Verification	222-S	Smith	S		11/23/92	A	10b
E92-396	12/03/92	Anion Analysis	222-S	Hendricksen	S		12/03/92	A	2g
E92-397	12/16/92	Corrective Action Verification	222-S	Langford	S		12/16/92	A	10b
E92-401	12/21/92	Corrective Action Verification	222-S	Horhota	S		12/21/92	A	10b
E92-403	12/16/92	Conduct of Operations - WHC-CM-5-4	222-S	Langford	S		12/16/92	A	1a
E92-404	12/21/92	Evaluation of JCO Statements on 222-S Response	222-S	Horhota / Lang.	S		12/21/92	A	10b
E92-410	12/22/92	Procedure Compliance to QAPP-003, 7.0	222-S	Langford	S		12/22/92	A	1a

EQA Surveillances

ISR #	Date Perfd.	Subject	Project	Surveillant	Status (S,U,C)	Respondant	Closed	Primary Code	Sub-Code
E92-415	12/31/92	Review of JCS Work Packages	222-S	Smith	S		12/31/92	A	4a
E92-419	12/15/92	Performance & System Audits	222-S	Hendricksen	U	L. H. Taylor	/ /	A	1a
E93-003	01/07/93	Safety Classifications	222-S	Langford	S		01/07/93	A	1a
E93-009	01/07/93	Corrective Action Verification	222-S	Hendricksen	S		01/07/93	A	10b
E93-013	01/11/93	Corrective Action Verification	222-S	Hendricksen	S		01/11/93	A	10b
E93-023	01/06/93	Corrective Action Verification	222-S	Hendricksen	U	W. W. Baird	03/18/93	A	10b
E93-032	01/26/93	Compliance to SOW	222-S	Langford	S		01/26/93	A	1a
E93-033	01/08/93	Data Quality Objectives	222-S	Hendricksen	U	J. H. Kessner	/ /	A	1a
E93-035	01/11/93	QAPP	222-S	Hendricksen	U	L. H. Taylor	/ /	A	1a
E93-044	01/29/93	Post Review of Impact Level 4 JCS Work Packages	222-S	Smith	U	J. L. Zwicker	03/08/93	A	4a
E93-045	01/30/93	Lock and Tag	222-S	Smith	U	D. M. Thornton	03/10/93	A	1a
E93-046	01/03/93	Preventive Maintenance - JCS	222-S	Langford	S		01/03/93	A	4a
E93-048	02/02/93	Corrective Action Verification - HASM	222-S	Hendricksen	U	E. F. Riedel	/ /	A	10b
E93-049	02/08/93	Controlled Procedures Maintained	222-S	Langford	U	12610	/ /	A	1a
E93-051	02/09/93	Analytical Procedure Update Review	222-S	Langford	U	P. K. Vacca	/ /	A	1a
E93-052	02/02/93	Corrective Action Verification	222-S	Hendricksen	S		02/02/93	A	10b
E93-054	02/16/93	Corrective Action Verification	222-S	Smith	S		02/16/93	A	10b
E93-058	02/23/93	Corrective Action Verification	222-S	Smith	S		02/23/93	A	10b
E93-059	02/11/93	Sample Dissolution GFAA	222-S	Hendricksen	S		02/11/93	A	2g
E93-060	02/11/93	Precision and Accuracy	222-S	Hendricksen	U	J. H. Tillman	/ /	A	2g
E93-067	02/24/93	Corrective Action Verification	222-S	Langford	S		02/24/93	A	10b
E93-068	02/26/93	Corrective Action Verification	222-S	Smith	S		02/26/93	A	10b
E93-072	02/18/93	QA Objectives Method Detection Limits	222-S	Hendricksen	U	D. A. Dodd	/ /	A	2g
E92-073	03/02/93	Location of Samples	222-S	Langford	S		03/02/93	A	2g
E93-081	02/19/93	Corrective Action System	222-S	Hendricksen	U	M. L. Bell	/ /	A	1b
E93-082	03/08/93	Corrective Action Verification	222-S	Langford	S		03/08/93	A	10b
E93-084	02/24/93	Data Evaluation	222-S	Hendricksen	U	L. H. Taylor	/ /	A	1b
E93-089	03/09/93	QAPP Compliance	222-S	Hendricksen	U	L. H. Taylor	04/30/93	A	1b
E93-090	03/08/93	Signature/Reviews of Lab Procedures	222-S	Langford	S		03/08/93	A	1a
E93-095	03/29/93	Procurement Documentation Review	222-S	Smith	S		03/29/93	A	1a
E93-106	03/31/93	JCS Work Packages	222-S	Smith	U	S. L. Brey	/ /	A	4a
E93-107	03/31/93	Maintenance Material Control	222-S	Smith	U	J. L. Zwicker	/ /	A	13
E93-112	03/29/93	Standards Preparation	222-S	Hendricksen	U	W. W. Baird	05/10/93	A	2g
E93-124	04/14/93	Standards Control	222-S	Langford	C		04/14/93	A	2g
E93-131	04/28/93	Implementation of Suspect Fastener Action Plan	222-S	Smith	S		04/28/93	A	14
E93-137	05/05/93	NESHAPs Training	222-S	Langford	C		05/05/93	A	9

EQA Surveillances

ISR #	Date Perfd.	Subject	Project	Surveillant	Status (S,U,C)	Respondant	Closed	Primary Code	Sub-Code
E93-138	05/04/93	Corrective Action Verification (Self-assessment)	222-S	Langford	S		05/04/93	A	10b
E93-139	05/12/93	Microdistillation Cyanide	222-S	Hendricksen	U	W. I. Winters	/ /	A	2g
E93-140	05/17/93	Control of Measuring & Test Equipment	222-S	Smith	U	14233	/ /	A	7a
E93-141	05/11/93	Training Procedures for 242A Evap. Readiness	222-S	Langford	C		05/11/93	A	9
E93-143	05/05/93	Calibration	222-S	Hendricksen	U	W. I. Winters	/ /	A	7c
E93-152	05/24/93	Corrective Action Verification	222-S	Smith	U	M. C. Thompson	/ /	A	10b
E92-179	06/24/92	COC Implementation for Regulated Airborne Emiss.	Effl. Mon.	Vance	U	G. W. Faulk	/ /	E	2c
E92-180	06/24/92	COC Implementation for Regulated Airborne Emiss.	Effl. Mon.	Vance	U	D. M. Bogen	/ /	E	2c
E92-181	06/24/92	COC Implementation for Regulated Airborne Emiss.	Effl. Mon.	Vance	U	J. C. Midgett	/ /	E	2c
E92-182	06/24/92	COC Implementation for Regulated Airborne Emiss.	Effl. Mon.	Vance	U	D. G. Hamrick	03/02/93	E	2c
E92-183	06/29/92	COC Implementation for Regulated Airborne Emiss.	Effl. Mon.	Vance	U	G. W. Faulk	/ /	E	2c
E92-211	06/03/92	Rad. Airborne Emissions-PFP Stack 219-Z-1	Effl. Mon.	Vance	U	L. A. Garner	08/31/92	E	2
E92-307	10/27/92	Vent. & Balance Air Flow Measurements/NESHAPs	Effl. Mon.	Vance	S		10/29/92	E	1b
E92-316	10/28/92	Environmental SOW to 222-S / NESHAPs	Effl. Mon.	Vance	U	S. P. Thomas	/ /	E	1b
E92-363	11/25/92	NESHAPs SOW for 325 Laboratory	Effl. Mon.	Vance	U	J. K. Perry	/ /	E	1a
E92-413	12/29/92	NESHAPS Monitoring at T-Plant	Effl. Mon.	Vance / Warn	U	E. J. Adams	/ /	E	1b
E92-418	12/31/92	340 Air Sampling	Effl. Mon.	Warn	U	R. L. Watts	02/26/93	E	1b
F93-006	01/26/93	400 Area Liquid Effluent Protocol Sampling	Effl. Mon.	Mischke	S		01/26/93	E	2a
E93-047	01/29/93	Measurement Procedures - Stack 340-NT-EX	Effl. Mon.	Warn	U	87410	03/19/93	E	1a
E93-069	02/17/93	NESHAPs Compliance	Effl. Mon.	Warn	U	16300	03/11/93	E	1a
E93-079	03/09/93	Liquid Effluent Protocol Sampling	Effl. Mon.	Young	U	G. T. Berlin	/ /	E	2a
E93-123	04/15/93	Effluent Sampling -PUREX	Effl. Mon.	Warn	U	33930	/ /	E	2a
EA93026	03/30/93	Effluent Sampling (NESHAPS)	Effl. Mon.	McGhan	U	R. L. Watts	/ /	E	2a
E93-133	04/29/93	Airflow Temp. Test (NESHAPS) --PUREX	Effl. Mon.	Warn	U	14321	/ /	E	1a
E93-151	05/26/93	Updating of QAPP	Effl. Mon.	Vance	U	S. P. Thomas	/ /	E	6
E93-153	05/25/93	Corrective Action Verification - WDOH Audit	Effl. Mon.	Warn	U	7C420	/ /	E	

From: Larry P Diediker at ~WHC171 6/21/93 1:21PM (922 bytes: 20 ln)
Priority: Urgent
To: Donald D Volkman at ~WHC188, Ladell W Vance at ~WHC188
Receipt Requested
cc: S P Thomas, Larry P Diediker
Subject: WHC-EP-0536 UPDATING
---------- Message Contents ----------

Don,

This is to re-confirm the phone conversation of last week concerning EEM's role in the updating of WHC-EP-0536.

Please inform Ladell Vance that Sandy Thomas is awaiting the file tramsmission of your organizational inputs. Our time is rapidly disappearing with much work still ahead of us.

It benifits all of WHC to provide the agreed upon deliverables to the EPA by their due dates.

Should you have any quesions please call me on 3-1716, or Sandy Thomas of my staff on 3-5119.

Larry P. Diediker

NESHAPS TRAINING

In completion of QA Oversight of the WHC NESHAPS QA Program Training, I have read the following documents:

- 40 CFR 61, Subparts A, H and Appendix B, Method 114;

- WHC-EP-~~0356~~ 0536, Quality Assurance Program Plan for Radionuclide Airborne Emissions Monitoring;

- WHC-CM-7-5, Environmental Compliance Manual, Section 2.0, "Air Quality," Parts 2.1, 2.2, 2.3 and 2.5.

_____
Printed Name

_____ _____
Signature Date

Please return completed form to: D. G. FARWICK - H4-16

SURVEILLANCE ACTIVITIES FOR NESHAPs SAMPLING AND ANALYSIS

(1) Is there a plan, prepared with or specifying procedures, that covers the following activities:
   (a) Organizational structure, functional responsibilities, levels of authority and lines of communication for all activities related to emissions measurement.
   (b) Administrative controls to ensure prompt response in the event that emission levels increase due to unplanned operations.
   (c) Identification of sampling sites and number of sampling points, including rationale for site selections.
   (d) A description of sampling probes and representativeness of the samples.
   (e) A description of the sample collection systems for each radionuclide measured, including frequency of collection, calibration procedures and frequency of calibration.
   (f) A description of the laboratory analysis procedures used for each radionuclide measured, including frequency of analysis, calibration procedures and frequency of calibration.
   (g) A description of the sample flow rate measurement system or procedures, including calibration procedures and frequency of calibration.
   (h) A description of the effluent flow measurement rate measurement procedures, including frequency of measurements, calibration procedures and frequency of calibraton.
   (i) The program objectives of Precision, Accuracy, and Completeness shall be identified including description of procedures used to assess these parameters.
   (j) A Quality Control program, where applicable, to evaluate quality of Emissions data. This includes, as needed, a system of replicates, spike samples, split samples, blanks, and control charts.
   (k) Sample tracking system, i.e. Chain of Custody.
   (l) Internal and External Audit system.
   (m) Corrective action program
   (n) Periodic reports to management.

ITEMS THAT SHOULD BE SURVEILLED FOR THE ABOVE ACTIVITIES
   (a) Organization-self evident
   (b) Unplanned Responses-These administrative controls should be surveilled by a safety organization. Facility QA should verify that the safety surveillances are being done.
   (c) Sampling Sites-Verify that the description of the sampling site coincides with the site where samples are taken. Facility QA
   (d) Sampling Probes-Verify information is included in plan. No field activities. Facility QA
   (e) Sample Collection-This describes the sampling procedures being used, the frequency of sampling and calibration procedures needed. Obtain most surveillances from this sampling procedure with frequency. Normally there are no field calibration activities. Facility QA
   (f) Laboratory Analysis Procedures-Verify that plan identifies laboratory analysis procedures or requirements. Facility QA

(g) Sample Flow Rate-Verify that the sample flow rate and calibration activities are checked in accordance with plan specified procedures. Normally this is checked at the same time that samples are taken (see e above). Facility QA

(h) Effluent Flow Rates-Effluent flow measurements involve several organizations. The facility Cog. Engr provide the JCS package to the facility Vent and Balance (V&B) organization who take only the direct field measurements. This information is then turned back to the facility Cog. Engr. who calculates the air flow. The air flow calculations are provided to the Effluent Emission Monitoring organization for use in calculating radioactivity emissions.

The procedures for doing these air flow measurements, as well as the calibration procedures for air flow measuring equipment, are prepared by the Procedure Development and Control organization. The scheduling of these activities is controlled by the Recall Systems organization.

The following surveillances should be performed by various QA Organizations:

(1) Support Quality Assurance-Verify that air flow measurement procedures have been prepared, with appropriate review and approval, by Procedure Development and Control. Verify that the Recall Systems organization has a system in place and properly implemented for calibration of stack measuring equipment.

(2) Facility Quality Assurance-Verify that Facility Cog. Engr. are properly preparing the JCS package and that V&B are measuring the stacks flows in accordance with specified procedures. Also verify that air flows are being properly calculated and submitted to Effluent Emission Monitoring.

(3) Environmental Services Quality Assurance-Verify that Effluent Measuring Monitoring has control of the radionuclide air reporting activities.

(i) Precision, Accuracy and Completeness
Field QA to verify that these requirements are properly included in the plan by the organization requesting the data. Most of these place requirements on the lab, which the field personnel will not be required to verify. If the sample is taken and controlled, as specified, the field QA personnel have no other responsibilities for these activities.

(j) Quality Control Program-These are various control samples and checks used both in the field and laboratory. The field control samples, if needed, are identified in the plan and would be surveilled to the same requirements as other field samples. The main surveillance activities are to assure that these samples are being taken and controlled in accordance with procedures.

(k) Sample Custody
Sample labels necessary for effective sample tracking, i.e. sample description, sample ID no., location, date, time, media, sample type, preservative, sampler identification, laboratory
Chain of Custody-field tracking reporting forms to establish sample custody in the field until sample is delivered to

laboratory-This form must identify sample and who has control of it at all times.

(l) Audits
To be done by Audits and ESQA organizations.

(m) Corrective Action Program
This is defined in most plans as section 16 of our QA Manual.

(n) Period Reports to Management
This is defined is most plans as our ISR, NCR, and CAR reports.

QUALITY ASSURANCE OVERSIGHT
OF
WESTINGHOUSE HANFORD COMPANY'S

NATIONAL EMISSION STANDARDS FOR

HAZARDOUS AIR POLLUTANTS (NESHAPs)

QUALITY ASSURANCE PROGRAM

PURPOSE

- Familiarize QA oversight personnel with NESHAPs regulations, 40 CFR Part 61.
- Introduce NESHAPs QA Methods 40 CFR Part 61, Appendix B, Method 114, Section 4.
- Describe WHC implementing documents for NESHAPs activities.
- Identify QA responsibilities for oversight of WHC NESHAPs implementation.
- Provide guidance on surveillance methodology, topics, and introduce example checklists.
- Identify availability of additional training resources.

BACKGROUND

- NESHAPs imposed at DOE Sites 1989 with full implementation required by June 1991.
- Recognized in DOE Order 5400.1 "General Environmental Protection Program."
  - Generate a plan to show how regulatory requirements for hazardous and radioactive liquid and air effluents would be implemented.
  - Facility Effluent Monitoring Plans (FEMPs) were prepared.

BACKGROUND (Continued)

- FEMPs identified seven stacks at WHC facilities requiring continuous monitoring on Hanford Site.
  - PUREX - Stack 291-A-1
  - PFP - Stack 291-Z-1
  - B-Plant - Stack 291-B-1
  - T-Plant - Stack 291-T-1
  - 340 Facility - Stack 340-NT-EX
  - 242-A Evaporator - Stack 296-A-22
  - 241-AP-Tank Farm - Stack 296-A-40

BACKGROUND (Continued)

- WDOE and EPA Audits of PFP and Tank Farms identified issues with WHC compliance with NESHAPs.
  - WHC prepared several implementing documents.
  - WHC prepared a compliance plan.

REGULATORY REQUIREMENTS

- 40 CFR 61, Subpart A - General Provisions
- 40 CFR 61, Subpart H - National Emission Standards for Emissions of Radionuclides Other Than Radon from Department of Energy Facilities
- 40 CFR 61, Appendix B, Method 114 - Test Methods for Measuring Radionuclide Emissions from Stationary Sources
- 40 CFR 61, Appendix B, Method 114, Section 4 - Quality Assurance Methods
- DOE Order 5400.1, General Environmental Protection Program

WHC NESHAPs QA PROGRAM DOCUMENTS

- WHC-EP-0536, Quality Assurance Program Plan for Radionuclide Airborne Emissions Monitoring.
- WHC-EP-0528, Quality Assurance Project Plan for Radionuclide Airborne Emissions Data Compilation and Reporting.
- WHC-EP-0561, Quality Assurance Project Plan for the Radionuclide Airborne Emissions for the Plutonium Finishing Plant.

WHC-EP-0536 QA PROGRAM PLAN FOR RADIONUCLIDE AIRBORNE EMISSIONS MONITORING

- Prepared to QAMS-004/80
- More Definitive in Organizational Responsibilities
  - ESQA overview site-wide organizations and laboratories.
  - Plant QA organizations to interface with Facility Cognizant Engineers.
  - Occupational Health and Safety take and deliver samples.
  - Facilities implement and monitor compliance.

WHC-EP-0536 QA PROGRAM PLAN FOR RADIONUCLIDE AIRBORNE EMISSIONS MONITORING

- Environmental Effluent Monitoring provide guidance, establish data quality objectives, specify QA/QC requirements, verify data, calculations and reporting.
- Laboratory provides analysis.
- Central Support Services obtain flow data, calibration services, stack flow measurements.

- Contains the Point by Point (PBP) comparisons for each stack.

WHC-EP-0528 QA PROJECT PLAN FOR RADIONUCLIDE AIRBORNE EMISSIONS DATA COMPILATION AND REPORTING

- Prepared in compliance with QAMS-005/80 Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans.
- Also complies with Quality Assurance methods 40 CFR Part 61, Appendix B, Method 114, Section 4.
- Addresses the QA requirements for compiling data from radioactive airborne streams.

WHC-EP-0528 QA PROJECT PLAN FOR RADIONUCLIDE AIRBORNE EMISSIONS DATA COMPILATION AND REPORTING

- Describes the responsibilities and activities necessary to collect, verify, compile and report WHC data.
  - Data collection
  - Data verification and validation
  - Data compilation
  - Calculations
  - Sample Scheduling
  - Data reporting
  - Laboratory analysis requirements

WHC-EP-0528 QA PROJECT PLAN FOR RADIONUCLIDE AIRBORNE EMISSIONS DATA COMPILATION AND REPORTING

- Quality Assurance Objective for Measurements are Identified
  - Analytes of interest
  - Analytical measurement limits and values for precision and accuracy
  - Data representativeness, completeness, comparability

NESHAPs QA OVERSIGHT RESPONSIBILITIES

- Environmental Services Quality Assurance
  - Coordinate and administer oversight activities for WHC NESHAPs QA Program.
  - Assist in interpretation and implementation of WHC NESHAPs QA Program.
  - Assist in review and approval of NESHAPs related documentation.

NESHAPs QA OVERSIGHT RESPONSIBILITIES

- Perform surveillances to monitor implementation effectiveness of WHC NESHAPs QA Program.
- Develop database for collecting, statusing, and trending corrective action and problem information.

- **Facility Quality Assurance**
  - Review and approve facility specific documentation related to NESHAPs QA Program implementation.
  - Perform surveillances covering facility specific activities related to NESHAPs QA Program.

NESHAPs QA SURVEILLANCE STRATEGY

- Prepared QA Oversight Plan with implementation to be directed and coordinated by ESQA.
  - WHC-EP-0536 QAPP
  - WHC-EP-0528 QAPjP
  - Conduct surveillances and audits
- QA surveillances based upon QAPP and QAPjP
  - Processes were flow charted.
  - Surveillances selected based upon evaluation of flowchart activities.
  - Checklists are being prepared.
  - Interfaces defined.
  - ESQA coordinate and/or perform surveillances.

NESHAPs QA SURVEILLANCE STRATEGY

- Activities to be monitored were selected and surveillances scheduled.
  - Sample Control
  - Data Control
  - Lab QC
  - Reporting
  - Effluent flow measurements and calculations
  - Calibration Control
  - Work Control

FY-93 NESHAPs SURVEILLANCES

- Sampling and analysis activities
  - Sampling at seven stacks
  - Analytical Laboratory Services
    - Sample Control
    - QC
    - Analysis
  - Environmental Effluent Monitoring
    - Statement of Work agreements
    - Data Reporting

FY-93 NESHAPs SURVEILLANCES

- Effluent Flow Measurements
  - Cover seven stacks
    - JCS packages, work control
    - Field flow measurements
    - Flow calculations
- Calibration of Flow Measuring Equipment
  - Cover seven stacks
    - Work Control (JCS)
    - Calibration per procedures

FY-93 NESHAPs SURVEILLANCES

- PISCES System
  - Scheduling
  - Calibration Control

- Thirty-two surveillances scheduled FY-93

SURVEILLANCE AREAS

- Environmental Services Quality Assurance
  - Site-wide implementation of NESHAPs QA Program
    - Facility activities.
    - Operational Support Services activities.
    - Environmental Effluent Monitoring organization activities.
    - Analytical Laboratory activities.

SURVEILLANCE AREAS

- Facility Quality Assurance
  - Facility specific activities (inside the fence)
    - Procedural compliance and effectiveness
    - Sample control
    - Calibration control
    - Work control
  - Interface with ESQA

SURVEILLANCE AREAS

- Support Quality Assurance
  - Operational Support Services activities
    - Procedure compliance and effectiveness
    - PISCES
  - Interface with ESQA

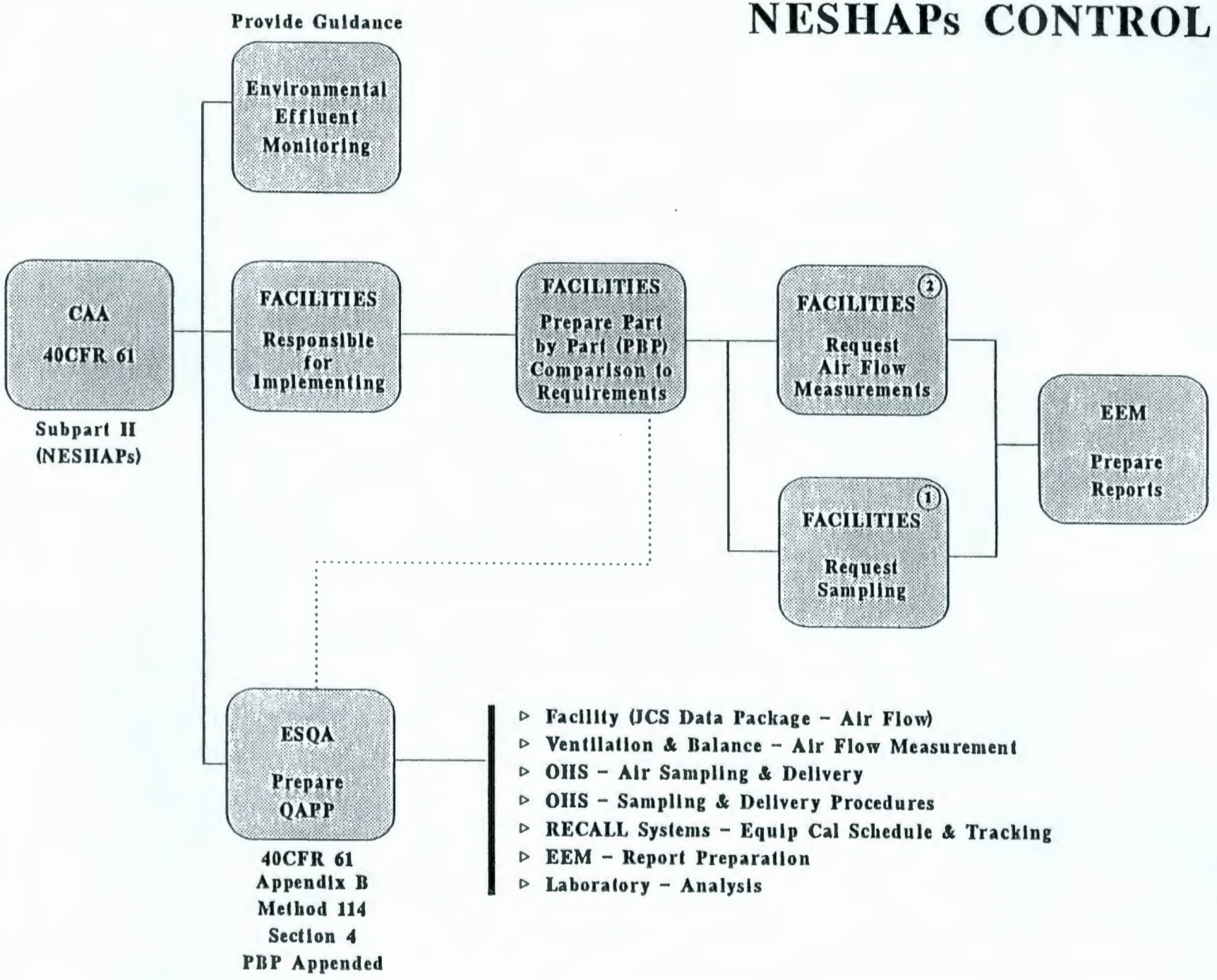
ADDITIONAL TRAINING RESOURCES

- Quality Training and Resource Center
  - Environmental Auditing (OSH-100015)
  - Environmental Laws and Regulations (ADM-010008)
  - Environmental Quality Assurance (OSH-100022)
  - Introduction to Environmental Oversight (OSH-100020)
- WSU Continuing Education Programs
  - Environmental Compliance for Federal Facilities
  - Washington State Environmental Law

READING LIST FOR QA OVERSIGHT OF NESHAPs

- 40 CFR 61 Subparts A, H, Appendix B Method 114
- WHC-EP-0536 - Quality Assurance Program Plan for Radionuclide Airborne Emissions Monitoring.
- WHC-CM-7-5 "Environmental Compliance Manual," Section 2.0, "Air Quality," Parts 2.1, 2.2, 2.3, and 2.5.

NESHAPs CONTROL



"NATIONAL EMMISION STANDARDS FOR HAZARDOUS AIR POLLUTANTS" IMPLEMENTATION

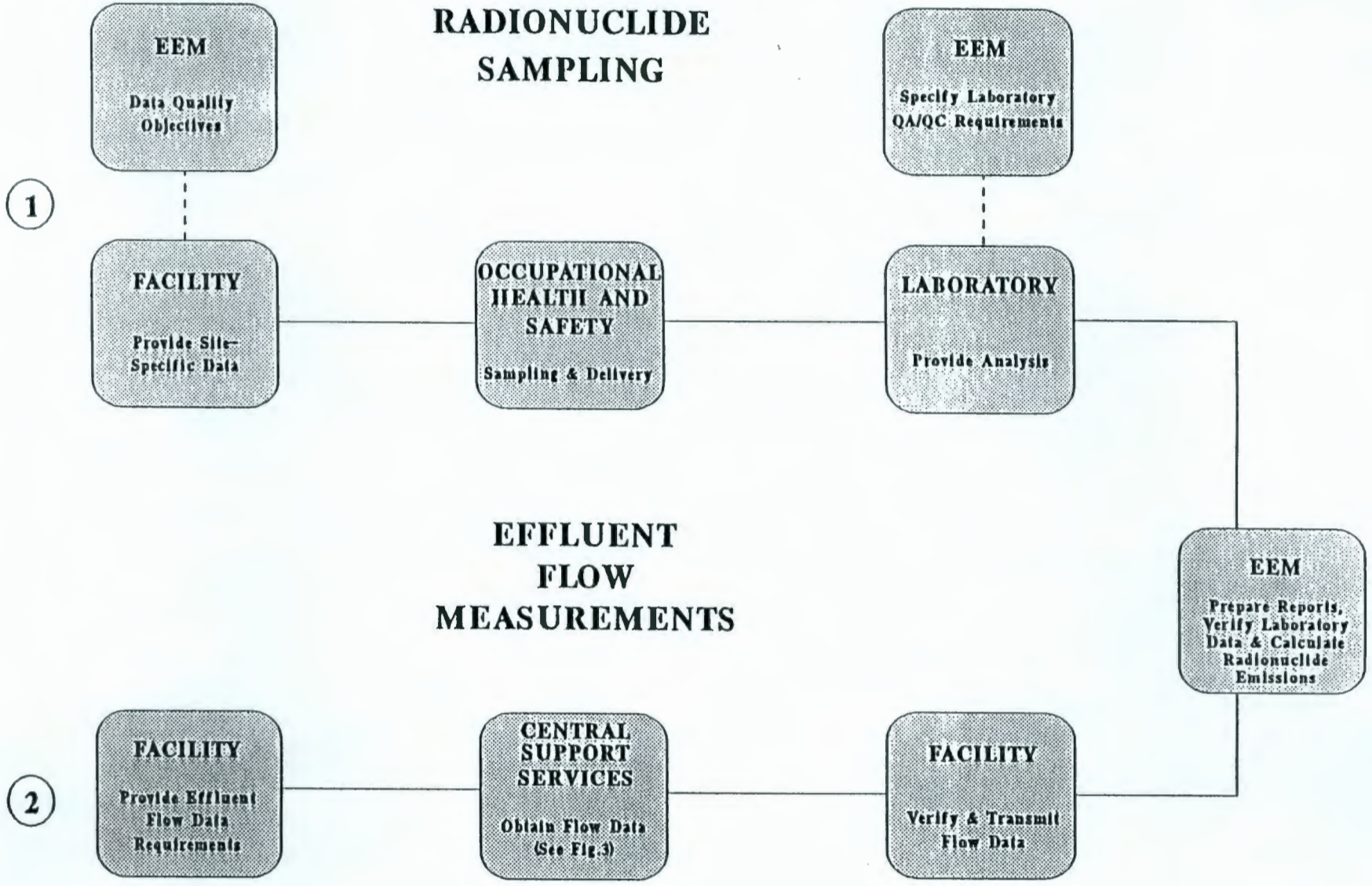
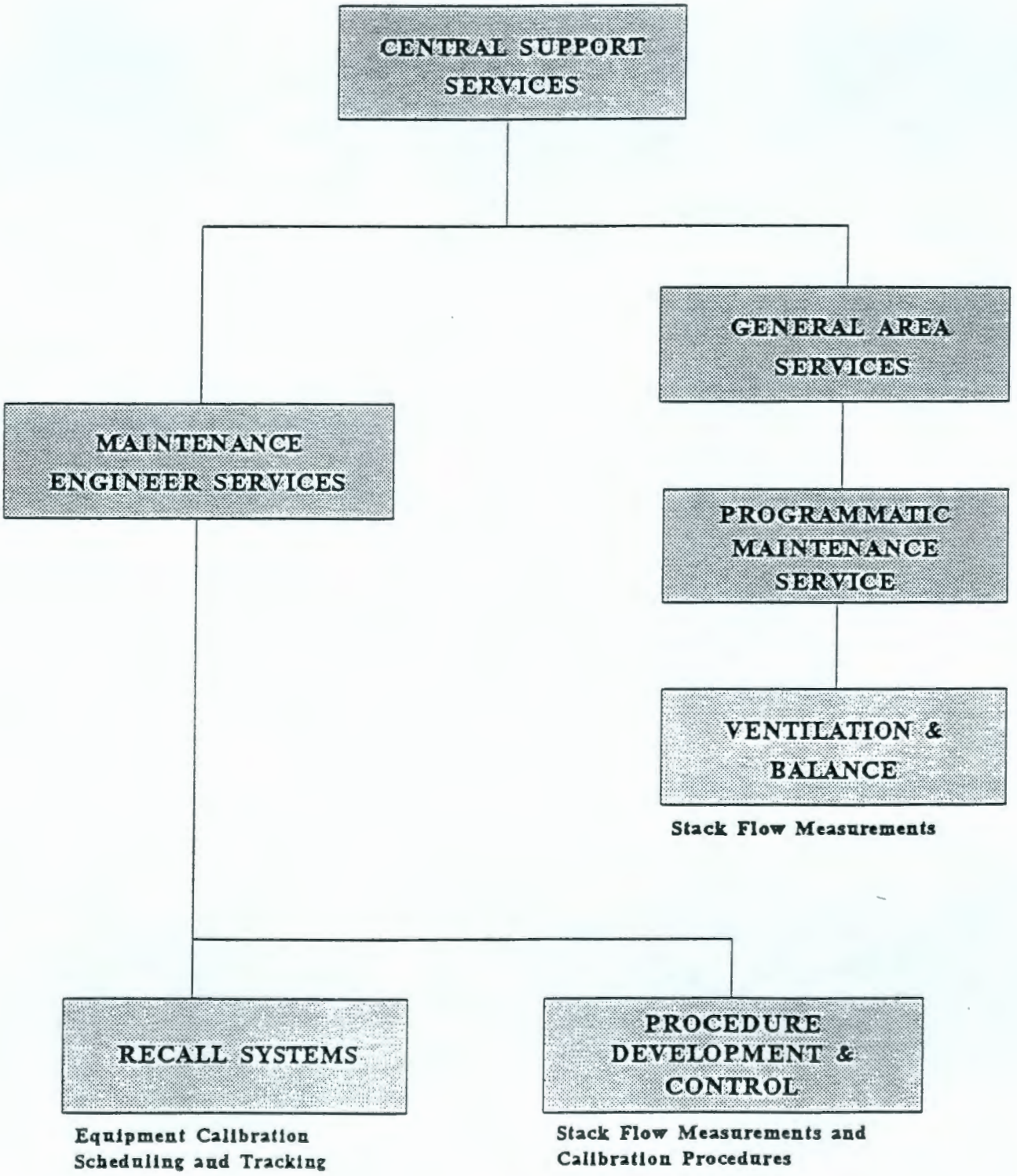


Figure 3.

EFFLUENT FLOW MEASUREMENTS