

# ENVIRONMENTAL NOTIFICATION FORM

Date: 9/12/2017

Notification No.: TOC-ENV-NOT- 2017-4412

Name: Ruth Allen

Revision No. 0

## Section 1. Spills

NA

Chemical Name: \_\_\_\_\_ MSDS No.: \_\_\_\_\_

Regulated per 40 CFR 302: Yes  No  EPCRA EHS: Yes  No

CAS No.: \_\_\_\_\_ Quantity Released: \_\_\_\_\_ Reportable Quantity (RQ): \_\_\_\_\_

CAS No.: \_\_\_\_\_ Quantity Released: \_\_\_\_\_ Reportable Quantity (RQ): \_\_\_\_\_

CAS No.: \_\_\_\_\_ Quantity Released: \_\_\_\_\_ Reportable Quantity (RQ): \_\_\_\_\_

Resource Conservation and Recovery Act Contingency Plan Implemented: Yes  No

National Response Center Staff Name: \_\_\_\_\_

National Response Center Report No.: \_\_\_\_\_

Tank Waste Release: Yes  No

## Section 2. Emission Control Equipment Deviation

NA

Stack ID/Facility: \_\_\_\_\_

Location: \_\_\_\_\_

Airborne Release: Yes  No  Personnel Contamination: Yes  No

Work Space Air Sample: \_\_\_\_\_ DAC

Description of Occurrence:

Date and Time of Discovery: \_\_\_\_\_

## Section 3. RCRA Compliance

NA

Double-Shell Tank Leak Detection System Yes  No

Single-Shell Tank Leak Assessment Process Yes  No

Single-Shell Tank Drywell Logging Yes  No

Double-Shell Tank Inadvertent Waste Transfer Yes  No

Location: \_\_\_\_\_

Date and Time of Discovery: \_\_\_\_\_

Description of Occurrence:

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## Section 4. Permit Deviation

NA

Air Emission Limit Exceeded: Yes  No

Emission: \_\_\_\_\_ Limit: \_\_\_\_\_ Release Amount: \_\_\_\_\_

ST4511 Permit Non-Compliance (G.11): Yes  No

ST4511 Permit Upset (S.8): Yes  No

RCRA Permit: Yes  No

Location: 7<sup>th</sup> Street Staging Area, approximately .5 miles west of 241-C Tank Farm

Date and Time of Discovery: 8/22/17 1400 hours

### Description of Occurrence:

On August 21, 2017; two ERDF RO/RO containers were drained of water at a staging area on 7<sup>th</sup> Street, approximately .5 miles west of 241-C Tank Farm. This discharge is authorized as a miscellaneous discharge under Section S1.A.2.c of permit ST4511. The discharge followed the BMPs listed in Section S4. The miscellaneous discharge was not expected to contain contamination based on a previous radiological survey of soil that had come in contact with similar waters. On August 22, 2017, the routine post-discharge radiological survey identified contamination levels of 1500 DPM/100cm<sup>2</sup> beta-gamma in the area of the discharge. On August 30, 2017, the area of contamination was cleaned up, and the contaminated soils and debris are being appropriately managed as waste.

As a result of contamination found at the discharge location, this activity is inconsistent with Section S4.A.7. This noncompliance has been categorized as an upset condition, consistent with Section S.8. Per the requirements of Section S.8, a 24-hour notification is required to Ecology. The 24-hour notification should have been made following the August 22 discovery. This notification was missed. This will serve as the notification for the upset condition and a 30-day follow up will be provided to Ecology as required by Section G11.C.

Problem evaluation requests have been initiated to document these issues and recommend process improvements. A detailed written report to Ecology will be submitted within 30 days.

### Distribution of this form shall be completed to the following groups by the originator.

Check all applicable distribution lists:

**Section 1:**

Phone: NRC 1-800-424-8802

- E-mail:
- DL-WRPS-NOT-MGMT
  - DL-WRPS-NOT-WDOH
  - DL-WRPS-NOT-ORP
  - DL-WRPS-NOT-ECY
  - Team Line Management
  - ^WRPS Occurrence Reporting

**Section 2:**

- E-mail:
- DL-WRPS-NOT-WDOH
  - DL-WRPS-NOT-MGMT
  - DL-WRPS-NOT-ORP
  - Team Line Management

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**Section 3**

Phone: • Ecology 1-509-575-2490

E-mail: • DL-WRPS-NOT-ECY  
• DL-WRPS-NOT-MGMT  
• DL-WRPS-NOT-ORP  
• Team Line Management

**Section 4:**

E-mail: • DL-WRPS-NOT-ECY  
• DL-WRPS-NOT-MGMT  
• DL-WRPS-NOT-ORP  
• Team Line Management