



**Fiscal Year 2011 End-of-Year Report
(July 2010 to June 2011)**

**RCRA Performance Partnership
Agreement (PPA)**

*for the Hazardous Waste and Toxics Reduction Program,
Nuclear Waste Program, and Industrial Section*

February 2012
Publication no. 12-04-005

Publication and Contact Information

This report is available on the Department of Ecology's Web site at www.ecy.wa.gov/biblio/1204005.html

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RCRA Performance Partnership Agreement

*for the Hazardous Waste and Toxics Reduction Program, Nuclear
Waste Program, and Industrial Section*

Washington State Department of Ecology
Olympia, Washington

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Introduction

This end-of-year report summarizes work carried out by the Washington State Department of Ecology (Ecology) during the state's 2011 fiscal year, July 2010 through June 2011. The work was part of the on-going state and federal government effort to properly manage hazardous wastes. The work was authorized by federal and state laws and rules, specifically including the:

- Federal Resource Conservation and Recovery Act and related rules
- Washington State Dangerous Waste statutes and related rules

A combination of resources from Ecology and the United States Environmental Protection Agency (EPA) funded this work.

Strategically, work reflected in this report was also aligned with the 2010-2011 Environmental Performance Partnership Agreement between Ecology and EPA's Region 10 office in Seattle. View the Agreement or download it from Ecology's Web site at www.ecy.wa.gov/ppa/10-11/ppa_2010-2011.htm.

Hazardous Waste and Toxics Reduction Program (HWTR) Pollution Prevention and Regulatory Assistance Section – Permits Group

There were no significant exceptions to the number of hours planned during this reporting period for any of the facilities listed below.

Philip Services (Burlington Environmental LLC¹) Tacoma

We consistently worked through the year on the collaborative process with Philip to develop an adequate permit application. We expect to reissue the final permit during early spring, 2012.

Philip Services (Burlington Environmental LLC) Kent

We consistently worked through the year on the collaborative process with Philip to develop an adequate permit application. We expect to reissue the final permit during summer, 2012.

Emerald Services, Inc.

Assisted our Southwest Regional Office (SWRO) on one compliance inspection and report. We processed two permit modifications.

US Navy, Keyport

Assisted our Northwest Regional Office (NWRO) on one compliance inspection and processed one permit modification.

Bonneville Power Administration (BPA) Ross Complex

We completed the collaborative process with BPA to develop an adequate permit application and issued the final permit shortly after the reporting period (October 10, 2011). We assisted SWRO on one compliance inspection and compliance report.

¹ Limited Liability Company

Inspections**Mandated Treatment, Storage, and Disposal (TSD) inspections**

Commitment = 1
 Completed = 1

Comment: A Compliance Enforcement Inspection (CEI) was conducted at Kronos Micronutrients, WAD027530526 (formerly Bay Zinc) in September 2010. Kronos is not operating as a TSD, and generates waste as a large quantity generator (LQG). See Permitting section.

LQG CEIs

Commitment = 5
 Completed = 5

Comment: Commitment met.

State Priority visits²

Commitment = 30
 Completed = 6

Comment: Six CEI evaluations at notified non-LQG sites. Four other site visits occurred at notified, non-LQG sites. Major enforcement (issuance of order and \$165,000 penalty, with subsequent appeal to Pollution Control Hearings Board) required inordinate amounts of resources this fiscal year (FY).

Increased Generator Contact (IGC) visits:

Commitment = 0
 Completed = 59

Comment: Commitment met. CRO staff conducted visits to 35 auto recyclers in CRO as part of the mercury switch campaign, and 112 auto recyclers statewide. Responded to 18 complaints.

Inspection Summary - CRO site visits:

Commitment	=	36	
Completed	=	12	RCRA notified sites – (1 TSD, 5 LQG, and 6 state priority)
		35	Auto recycler visits in CRO
		77	Auto recycler visits in other regions
		46	Complaint response actions (28 in Environmental Report Tracking System (ERTS), 18 in Revised Site Visit Program (RSVP).
<hr/>			
Total	=	124	Completed site visits

² Defined as medium quantity generators (MQG), conditionally exempt small quantity generators (CESQG), delinquent annual reporters (DAR), new notifier (NN), and technical assistance (TA).

Permitting

Yakima Training Center:

- The Army has completed their investigation and cleanup at all but one site at the 324,000 acre facility. A RCRA corrective action completion report has been submitted. This report is a summary of historical record review, investigation, and cleanup actions at every potentially contaminated site (115) identified in the 1993 RCRA Facility Assessment.
- The Land Use Control Plan describing future management of eight sites needing institutional controls has been finalized and accepted by Ecology.
- Groundwater sampling continues for two contamination plumes.
- The remedial investigation of the May 2008 fuel spill at the petroleum oil lubricant facility is now complete. The Army intends to propose institutional controls (soil cover and groundwater monitoring) to manage contaminated media in place.
- The “Human Exposure” and “Groundwater Migration Under Control” environmental indicator determinations were completed in 2009.

Kronos Micronutrients (formerly Bay Zinc):

- Institutional controls have been implemented. The site continues to conduct long term groundwater monitoring. The “Human Exposure” and “Groundwater Migration Under Control” environmental indicator determinations are complete.

Cameron Yakima, Inc:

- No change from last year.
 - The “Human Exposure” and “Groundwater Migration Under Control” environmental indicator determinations remain current.
-

Enforcement/Corrective Action

Double H LP³ and Double H LP Grandview:

- These two related sites were issued an Order with Penalty of \$165,000 for the mismanagement of hazardous waste on 09/27/2010. The action was appealed and settlement has been reached although the final settlement has not been signed. Double H filed a public disclosure lawsuit in relation to this case, taking a large amount of additional time.

Whitney Farms:

- Ecology issued an action requiring disclosure of disposal records for waste disposal from Whitney Farms on April 1, 2011. Ecology referred the site to the Environmental Protection Agency (EPA) for further action. Whitney Farms appealed the order.

³ Limited Partnership

Inspections

LQG CEIs:

Commitment = 5
Completed = 11

State Discretionary/State Priority visits:

Commitment = 12
Completed = 55

Comment: Completed visits include - 8 MQG CEIs, 5 CESQG CEIs, 3 XQG CEIs, 8 Corrective Action visits (CAVs), 4 Case Development Inspections (CDI)s, 15 Follow-up Inspections (FUI)s, and 12 complaint site visits

Increased Generator Contact visits:

Commitment = 60
Completed = 45

Comment: IGC visits completed this fiscal year included visits to several veterinary clinics.

Delinquent Annual Report visits:

Commitment = 0
Completed = 0

Enforcement/Corrective Action

Smith Chrome Plating, Inc.:

- Began work on a recommendation for enforcement for this facility in Walla Walla for several repeat dangerous waste violations. A separate enforcement action is planned for water quality violations.

Goodrich Corporation (Aircraft Wheel and Brake Division):

- Work continued on outstanding items of a Stipulated Order and Penalty executed in January 2007.

Inspections**TSD Inspections**

Commitment = 2

Completed = 2

CEI Emerald Services - 03/16/11

Burlington Environmental/Phillips Services Corporation (PSC) Tacoma

We are still within the period covered by the Stipulated Order and Penalty negotiated in October 2009. It ends in 2011. As a result, PSC will be audited bi-monthly by a third party with results submitted to Ecology. These audits occur on weekends and evenings at a time Ecology would be unable to inspect and contain stipulated penalties for violations. EPA Region 10 agreed with Ecology that CEI's would be suspended for this facility for the two-year duration of the Stipulated Order and Penalty. Ecology's review of the audits will be counted as a Non-Financial Records Review for purposes of RCRAInfo.

BPA Ross was inspected by Ecology on 03/16/11.

LQG CEI's

Commitment = 25

Completed = 31

State Priority Inspections (SPI's)

Commitment = 30

Completed = 72

New Notifier Visits

Commitment = 15

Completed = 20

Increased Generator Contacts

Commitment = 30

Completed = 44

Other State Site Visits

Commitment = 20

Completed = 52

Total State Discretionary Facility Site Visits

Commitment = 95

Completed = 135

Permit Modifications and Renewals

SWRO's projected work on the PSC-Tacoma Permit renewal occurred during FY11. In addition, we projected a Class 1 permit modification for PSC Tacoma for a tank replacement.

Permitting, Closure, Post-closure and Corrective Action Work

Facility # Facility Name	RCRA Info Target for 2011	Ecology Hours	Comments
TSD Operating Permits: Active "Part B", Part "A", and Permit Modifications Work (application review, Notice of Determinations (NODs), appeal negotiations, etc.)			
WAD 981769110 Emerald Services	Revise sections of the permit to reflect status of corrective action and changes to groundwater monitoring program; review and comment on revisions to closure plan.	75.00	The renewed permit was effective April 1, 2010. Staff reviewed and approved groundwater monitoring program. Ecology and Emerald went through dispute resolution concerning the cost estimate for groundwater monitoring.
WAD 020257945 Burlington Environmental/PSC – Tacoma Facility	Revise permit language to incorporate Toxic Cleanup Program Agreed Order (AO) for Taylor Way and Alexander Avenue (TWAA) Fill Area; review and comment on revisions to closure plan.	75.00	TCP did not negotiate an AO for the TWAA Fill Area. HWTR staff drafted a placeholder AO for PSC's Tacoma facility and revised permit language to reflect the placeholder order. Staff reviewed and commented on revisions to the closure plan.
WAD 092300250 Burlington Environmental/PSC – Washougal Facility	Revise fact sheet and public notice; send draft permit and AO for corrective action out for public comment.	100.00	Public comment on the draft permit and AO is on hold until the remedial investigation and feasibility study are complete and a CAP is drafted.
WAD 981769110 Emerald Services	Work on Permit renewal	150.00	The renewed permit was effective April 1, 2010.
WAD 020257945 BEI/PSC	Work on Permit renewal	350.00	Leslie's work on permit renewal.
TSD: Site-Specific Closures			
WAD 980511729 Petroleum Reclaiming Service	Continued work to approve revised closure plan for existing facility.	30.00	Staff approved a revised closure plan in April 2009. Staff reviewed reports on monitoring well installation and groundwater monitoring.
		0.00	This work has been postponed due to the Port of Tacoma's decreased shipping container activity.
TSD: Corrective Action			
WAD 010745971 International Paper	Receive Remedial Investigation/ Feasibility Study (RI/FS) report for the Maintenance Facility Area (MFA).	150.00	Quarterly conference calls with International Paper (IP) and Port of Longview were restarted. IP submitted a revised RI/FS report for the MFA in May 2011.

Facility # Facility Name	RCRA Info Target for 2011	Ecology Hours	Comments
	Negotiate restrictive covenant for the Treated Wood Products (TWP) Area.	100.00	The restrictive covenant for the TWP Area is on hold until a CAP and restrictive covenant are drafted for the MFA.
WAD 020257945 Burlington Environmental/PSC – Tacoma Facility	Assist the Toxics Cleanup Program (TCP) with drafting AO for Taylor Way and Alexander Avenue (TWAA) fill Area.	150.00	TCP did not negotiate an AO for the TWAA Fill Area. HWTR staff drafted a placeholder AO for PSC's Tacoma facility and revised permit language to reflect the placeholder order. Staff reviewed and commented on revisions to the closure plan.
WAD 092300250 Burlington Environmental/PSC – Washougal Facility	Receive revised RI/FS report.	150.00	In September 2010, staff commented on the draft RI/FS report submitted in January 2010. In May 2011, staff rebutted PSC's responses to Ecology's comments.
WAD 09252891 Reichold/SSA Marine	Review and comment on the development of soil removal work plans for the former pentachlorophenol (PCP) plant area, the butylphenol process area, and the hydrochloric pond.	100.00	Intermediate aquifer informational monitoring well locations were evaluated and verified to be in the correct locations to monitor the former PCP plant and butylphenol process areas.
	Implementing soil remedy. Provide oversight of soil removal activities.	80.00	Evaluated treatment of PCP impacted soil at the soil treatment cells, verified that treatment levels were achieved and issued permission to remove soil from Horizons 6 and 8 in treatment cells 3 and 4.
	Develop a contained-in consensus letter with requirements and contingent management of F021 listed waste that will be disposed of off-site.	0.00	There was no work on this in FY11.
	Begin closure of the Corrective Action Management Unit and the soil treatment cells.	100.00	Closure work was delayed due to increased workload at the Occidental Chemical site.
	Review semi-annual CM data	100.00	Reviewed semi-annual groundwater monitoring results.
WAD 008958357 Cascade Pole and Lumber Company	Complete the FS, Cleanup Action Plan (CAP), and guide CAP through the public comment process and complete negotiations on a Consent Decree (CD). Respond to comments, set up public meeting, and deal with EPA.	300.00	Continued to review and comment on the RI/FS. Completion of the RI/FS was delayed due to the dispute process and increased workload at Occidental Chemical.

Facility # Facility Name	RCRA Info Target for 2011	Ecology Hours	Comments
	Implement groundwater compliance plan. Oversee field work (installation of monitoring wells, slug testing) and evaluate monitoring data.	150.00	Groundwater compliance plan was not developed because the RI/FS revision was not completed.
WAD 087462503 Fuel Processors	Complete second phase of RI.	160.00	This work was not completed. A potentially liable person (PLP) letter was issued to Shell Oil Co.
	Review and provide comments on a draft FS. Approve a final FS.	0.00	Contingent on completion of RI, which did not happen in FY11.
	Develop the CAP and guide through a public comment process and complete negotiations on a CD. Respond to comments and set up public meeting.	0.00	Contingent on completion of RI, which did not happen in FY11.
	Implement the CAP.	0.00	Contingent on completion of RI, which did not happen in FY11.
WAD 009242314 Occidental Chemical	Evaluate 3-D model calibration report and work with Keta Waters on independent model calibration.	200.00	Reviewed and commented on the draft Groundwater Flow Model and the Modeling Peer Review Memorandum. Assisted Keta Waters in developing alternative models.
	Manage the modeling contract and interact with Dr. Massmann on modeling issues.	40.00	Reviewed Keta Waters's invoices and amended the contract with additional funding and time. Worked closely with Dr. Massmann on groundwater modeling issues.
	Implement the model to the evaluation of soil and groundwater remedies.	250.00	This work is on hold until the groundwater flow model is approved. Data gaps pertaining to the flow model need to be investigated and the model(s) revised before the final flow model is approved. Other work completed included the review and comment on geo-statistical methods used in the Environmental Visualization System software to interpolate/extrapolate subsurface contaminant plumes.

Facility # Facility Name	RCRAInfo Target for 2011	Ecology Hours	Comments
	Review pH treatability study and potential work plans for new pH pilot studies.	50.00	<p>Much time was spent reviewing input parameters (including stratigraphy, flow directions, and density distributions) for Occidental's model during its development. Many of Ecology/EPA comments were incorporated into Occidental's model.</p> <p>Much time was also used discussing uncertainty and the non-existence of a unique model to represent the site conditions. Occidental's failure to acknowledge and account for uncertainty during modeling development resulted in the need for Keta Waters to start developing model alternative(s), which will provide the agency's confidence in the ability to evaluate and select appropriate remedies. Occidental submitted a draft model in mid-July, 2011.</p>
	Corrective Action Management Plan (CAMP) related work. Will probably involve review of monitoring reports and field oversight of monitoring well sampling and slug testing.	100.00	This work is on hold pending completion of data gaps identification and the results of upcoming subsurface investigations. In lieu of CAMP work, reviewed, commented, and approved the Draft Production Well Investigation report.

Facility # Facility Name	RCRAInfo Target for 2011	Ecology Hours	Comments
	Transfer soil and groundwater sampling data to Environmental Information Management System (EIM)	30.00	<p>This work was not completed due to unscheduled work.</p> <p>Unscheduled work includes:</p> <ol style="list-style-type: none"> 1. Reviewed, commented, and disapproved the initial Data Gap Evaluation for Site Characterization Report. 2. Entered into dispute with Occidental over the Ecology/EPA revised schedule that included new tasks related to contaminant transport modeling and data gaps that are considered necessary for remedy evaluation by Ecology. 3. Completed an initial assessment of data gaps with EPA and sent a Data Gaps Definition and Scope document to Occidental/ Conestoga-Rovers Association. 4. Conducted a sequence of reviews and comments on the draft Final Groundwater Density Distribution Report. <p>Other completed unscheduled work:</p> <ol style="list-style-type: none"> 1. Reviewed and commented on Draft Production Well Investigation Report. 2. Reviewed and approved Final Production Well Investigation Report. 3. Provided Occidental a summary of Plant South (709/721 Alexander) data gaps. 4. Reviewed, commented, and rejected the unscheduled interim action (IA) Groundwater Migration Control Proposal. 5. Prepared for and participated in the first of a scheduled series of Agency/Occidental/ Conestoga-Rovers Association technical meetings. <p>Ended dispute on June 15, 2011.</p>
WAD 009242314 Pioneer Americas LLC Occidental Chemical	Review and comment on one or more revised drafts of Site Characterization report(s) and approve report.	240.00	Reviewed and commented on the initial Data Gap Evaluation for Site Characterization report. Approval of Site Characterization report is on hold until investigation of data gaps is complete.

Facility # Facility Name	RCRA Info Target for 2011	Ecology Hours	Comments
	Review and comment on draft and revised reports for pH treatability studies and subsequent overall pH pilot study report including recommendations for remediation of high pH.	150.00	See pH treatability study comment above.
	Selection of final set of site-wide remedies.	200.00	See additional activities regarding data gaps above.
	Review and comment on development and calibration of 3D model.	100.00	See comment on 3D modeling above.
	Coordination with Port of Tacoma development plans.	80.00	Reviewed Port of Tacoma reports on proposed development. Initiated a series of meetings with Citizens for a Healthy Bay, the Puyallup Tribe and the Port on Cleanup progress at the site. Meetings held intermittently through 6/15/2011.
WAD 980664718 University of Washington (Arrcom)	Review and comment on draft supplemental FS for Howe and Williams parcels.	120.00	Ecology comments of the draft supplemental FS noted that a focused vapor intrusion (VI) investigation is required to determine the impact of the Perchloroethylene (PCE) plume beneath the federal courthouse on indoor air quality. Indoor air measurements in buildings overlying the PCE plume did not exceed action levels developed for volatile contaminants of concern. Further vapor intrusion investigations will be addressed by Ecology's TCP program oversight for the entire site. Review and comments for the draft Interim Action Alternative Analysis was started. A first amendment to the current AO was started to implement interim action for the PCE groundwater plume that originates from the Howe Parcel. Institutional controls for the Williams Parcel will be deferred to final corrective action with TCP.

Facility # Facility Name	RCRAInfo Target for 2011	Ecology Hours	Comments
WA 9214053465 Fort Lewis	Review and provide comments on revised draft of FS for Miller Hill and Skeet former ranges and issue approval of revised FS report.	160.00	The Army disputed Ecology comments, which required additional Ecology review time. An Interim Action Plan was reviewed and commented on. Army disputed that the corrective actions were interim actions (IA) for the site. Agreement was reached by Ecology and the Army that the CAs are IAs for the two former ranges. A draft IA work plan will be submitted for the former ranges. Work was started on a new AO for the site to include IAs. The site-wide FS will not be considered complete until corrective actions are under consideration for the last remaining area at the site.
	Review and provide comments on revised draft of FS for Seven Sites and issue approval of revised FS report.	80.00	Refer to Landfill #9 comment below. Actions at the landfill will only address a portion of the entire site and are considered interim actions. The site-wide FS will not be considered complete until corrective actions are under consideration for the last remaining area at the site.
	Oversee pilot test of interim air sparge and soil vapor extraction (SVE) system installed by Credit Union building contractor and subsequent design modifications as necessary based on pilot test results.	160.00	It was determined that this is a leaking underground storage tank (LUST) site, thus Ecology's TCP is providing oversight for the corrective actions. TCP will likely be included in a new corrective action AO when the AO negotiations are complete.
	Coordinated review and comment on results of Terrestrial Ecological Evaluation (TEE) of Landfill #9 with Dave Sternberg, Ecology Ecotoxicologist.	40.00	During fieldwork for the TEE indications of additional potential contaminants were encountered. A supplemental investigation to determine the extent of the landfill is underway. Dave Sternberg left Ecology at the beginning of 2011.
	Review and comment on monitoring reports for munitions impact areas.	60.00	The annual groundwater monitoring reports was reviewed in FY11 and will continue to be reviewed by Ecology.

Facility # Facility Name	RCRA Info Target for 2011	Ecology Hours	Comments
	Review and comment on draft and revised drafts of CAPs for Seven Sites and Miller Hill/Skeet former ranges.	100.00	A new AO is under negotiation with the US Army to investigate and identify corrective actions, including interim actions at the remaining solid waste management units (SWMU) and Areas of Concern (AOC) and any newly identified releases. When corrective action is under consideration for the last area the site-wide FS and CAP can be considered 'final' for the site.
	Issue draft CAPs for Seven Sites and Miller Hill/Skeet former ranges for public comment. Issue approval of CAPs.	60.00	A new AO is under negotiation with the US Army to investigate and develop interim actions at the remaining SWMUs and AOCs and any newly identified releases. When the last corrective action is under consideration, a draft site-wide CAP will be developed.
	Coordinate with Ecology Attorney General to develop administrative mechanism to implement approved CAPs.	80.00	When the last corrective action is ready for implementation under the new AO, a site-wide CAP will be developed. An administrative mechanism can be developed to implement the site-wide CAP, which will incorporate earlier interim actions.
	Unscheduled work on B-Range, North Fort		A notice of release letter was submitted for unexploded ordnances (UXOs). Ecology's time involvement was dependent on whether UXO technical assistance could be procured. A UXO expertise contract was not procured. Ecology made a request for EPA to take on oversight for B-Range, North Fort because federal staff had the expertise. Much time as spent determining the appropriate legal language and mechanism. EPA is currently providing oversight while formal acceptance from EPA management is pending.

HWTR

Northwest Regional Office (NWRO)

Inspections

TSD Inspections

Commitment = 1

Completed = 1 US Navy-Keyport, "Q5" September 2011

LQG CEI's

Commitment = 50

Completed = 65

State Priority Inspections

Commitment = 75

Completed = 275

Total NWRO site visits

Commitment = 126

Completed = 341

Permitting, Closure, Post-closure and Corrective Action Work

Facility # Facility Name	RCRA Info Target for 2011	Ecology Hours	Comments
TSD Operating Permits: Active "Part B", Part "A", and Permit Modifications Work (application review, NODs, appeal negotiations, etc.)			
WAD 991281767 Philip Services - Kent	Support Headquarters on RCRA Permit renewal.	26.00	Robin; completed aboveground stabilization tank closure in preparation for permit renewal.
WAD 000812917 BEI – Terminal 91	Final CAP- corrective action permit/order development in-place-of RCRA Permit	116.0	Galen; worked with Assistant Attorney General to negotiate Final CAP AO and modify permit with Port of Seattle – ongoing.
TSD: Site-Specific Closures			
Northwest EnviroService	Target: CL360	75.00	Byung Maeng agreed to be the contact for this facility with EPA – Completed.
Oeser Company	Target: CL36	00.00	Byung; Completed.
TSD: Corrective Action			
WAD 000812917 BEI – Terminal 91	CA 400 – Remedy Selection-Final CAP and CD/or AO.	440.00	Galen; CAP remedy selected, however final AO not finalized until second quarter of FY 2012.

Facility # Facility Name	RCRAInfo Target for 2011	Ecology Hours	Comments
WAD 991281767 BEI – Kent	CA 300, Compliance Monitoring with Sampling (CMS) Work plan approved.	400.00	Robin; CMS Work plan review is on hold pending completion of BEI – Kent Permit Renewal, Part 2 – CA. Review began with Section I, Facility Closure Plan, of BEI Kent Permit Renewal application.
WAD 941337130 Boeing - Auburn	CA 300, CMS Workplan approved.	550.00	Robin; CMS is on hold until the Remedial Investigation (RI) is completed. Review of three RI Work Plans is complete. RI work continues to define the full extent of the 1.6 mile-long, low-concentration plume of volatile organic compounds (VOC) (tetrachloroethylene (TCE) and daughter products) in groundwater.
WAD 093639946 Boeing - DC	CA 100 Oversee Voluntary Cleanup Program (VCP).	150.00	Byung; completed.
WAD 999262171 Boeing - Renton	CA 400 Remedy selection/Compliance monitoring (CM) imposed.	200.00	Byung; CAP is being revised in accordance with comments received during public comment period. After CAP revision is completed, this CM milestone will be met.
	CA 450 CM design approved.	346.00	Byung; CAP is being revised in accordance with comments received during public comment period. After CAP revision is completed, this CM milestone will be met.
WAD 009282302 Rhone-Poulenc	CA assistance to EPA	50.00	Byung; completed.
WAD 076655182 BSB Diversified	CA 350, CM implementation approved	670.00	Hideo; CA 350 CMS approved for the shallow aquifer. Ongoing investigation continuing on the deep aquifer. No decision reached on deep aquifer CMS at this time.
WAD 045256971 Hexcel Corp. Structures	CA 330, CM implementation begun	196.00	Hideo; The RCRAInfo CA Event code should be CMS 250. CA 250 CMS Imposition. Facility RFI document currently under review. Project CMS 250 decision by 4 th quarter (June, 2012).

Facility # Facility Name	RCRAInfo Target for 2011	Ecology Hours	Comments
WAD 009256819 Boeing – Plant 2	CA 270 CMS Workplan review and modification	50.00	Hideo; Boeing Plant 2 is an EPA10 lead site. Ecology is in a support role only. RCRAInfo CA Event coding under the purview of EPA10.
WAD 000812909 BEI (PSC) – Georgetown (and three related MTCA ⁴ sites located west of 4 th Ave S)	For the PSC site east of 4 th : CA450, 500, and 550 RC for part of the remedy. For contamination west of 4 th : CA 190	1023.00	Ed; hours for PSC site east of 4 th , 4 sites west of 4 th . CA 550 RC was not completed for any part of the east-of-4 th action due to the length of time required to attain CA500.
WAD BEI (PSC) - Washougal	CA 200	173.00	Ed; assist SWRO site manager. CA200 was not achieved due to the need for supplemental RI/FS information and an RI report revision.
WAD 009278706 GE Aviation	CA 400 Remedy Selection – CAP and CD.	273.00	Dean; draft CAP finalized FY2011; CD negotiations ongoing.
WAD 041585464 Boeing - Everett	CA 180/195/600 Monitor and Complete 2 nd Enhanced Bioremediation TCE Source Area GW IA.	150.00	Dean; Enhanced Bioremediation interim action still active in FY2011 and expected to monitor treatment through FY2012.
	CA 180/195/600 New Downgradient TCE GW Interim Action	250.00	Dean; AO signed, IA work plan Phase I approved, construction ongoing through summer 2012.
	CA 190/200/270 Finalize and approve Sediment and Upland RI. Impose Receive Comment on CMS.	323.00	Dean; completed.
WAD 067548966 Univar USA Inc - Kent	CA 260 CMS draft workplan submittal; CA 300 CMS Workplan Approved; CA 400 Remedy Selection/CM Imposed	350.00	Greg; completed.
WAD 058367152 NW EnviroServices	Corrective action assistance to EPA	75.00	Byung; completed.
CA Policy, Corrective Action Network, non-site specific CA/CL needs and Government Performance and Results Act environmental indicator work		374.00	Byung (50); Ed (25); Hideo (25); Dean (150); Robin (54); Galen (70)
RCRA Assistance to TCP		155.00	Byung (50); Hideo (65); Dean (40)
Assistance to TCP on state Vapor Intrusion (VI) Guidance		75.00	Ed. The TCP Policy Unit did not revise the draft guidance in 2011 and therefore no assistance was requested. However, Ed assisted individual TCP site managers with VI assessments during this period.

⁴ Model Toxics Control Act

Nuclear Waste Program (NWP)

The NWP met our commitments for this period.

Inspection Details

- WA7890008967, Hanford Site-wide Permit Dangerous/Mixed Waste Inspection at the T-Plant facility; September 22, 2010
- WA2170023418, Puget Sound Naval Shipyard Permit Mixed Waste Inspection at Building 1002; October 14, 2010
- WA7890008967, Hanford Site-wide Permit Site and Technical Visits, July 2010 to June 30, 2011, 25 total throughout the Hanford site, including:
 - 600 Area Purgewater Unit 1
 - Waste Encapsulation Storage Facility
 - Effluent Treatment and Liquid Effluent Retention Facility
 - 100 N Areas
 - 242-A Evaporator
 - Tank Farms
 - Waste Treatment Plant

Permitting, Closure, Post-Closure

WAR000010355 PermaFix: Modifications and Application

- August 17, 2010 Class 2 modification request made and became effective February 7, 2011. This was for construction of a rail spur. The 60-day comment period ended October 22, 2010 and a public meeting held 9/22/2010
- Class 1 modification (prior written approval by Director) in 2010 completed to remove buildings never associated with dangerous waste and to change a fence line.
- March 3, 2011 Class 1 Modification (prior written approval by Director) for changes in procedures for management of large containers.

Applications:

- June 23, 2011, request for exception to Permit Condition II.F.5(f) storage time limit.
- August 8, 2010, Notice of Deficiency on revision O, permit application from Ecology to PermaFix.
- May 12, 2011, Dangerous Waste/Toxic Substance Control Act (TSCA) Permit Revised Renewal Application submitted.

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- August 23, 2010 Class 1 Permit Modifications, five total:
 1. Hanford Emergency Management Plan

2. 242-A Evaporator Unit 4
 3. Waste Treatment Plant, Unit 10
 4. Integrated Disposal facility, Unit 11
 5. Closure Unit 216-A-10 Crib
- October 27, 2010 Class 1 Permit Modifications, four total:
 1. Waste Treatment Plant, Unit 10
 2. Purex Storage Tunnels, Unit 2
 3. Effluent Treatment Facility and Liquid Effluent Retention Facility, Unit 3
 4. List of Attachments, Permit Revision Rev 8C
 - January 10, 2011 Class 1 Permit Modifications, two total:
 1. Effluent Treatment Facility and Liquid Effluent Retention Facility, Unit 3
 2. Waste Treatment Plant, Unit 10
 - April 14, 2011 Class 1 Permit Modifications, two total:
 1. Waste Treatment Plant, Unit 10
 2. 331 Storage Unit 15
 - July 19, 2011 Class 1 Permit Modifications, three total:
 1. Effluent Treatment Facility and Liquid Effluent Retention Facility, Unit 3
 2. Waste Treatment Plant, Unit 10
 3. Closure Unit 4, Single Shell Tank System

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 All operating, closure, and corrective action units for the permit will be completed for formatting by February 15, 2012. The Single Shell Tank System permit unit is not included in this schedule. The draft Rev. 9 Permit will go to public comment May 1, 2012.

Industrial Section

Inspections

The majority of our inspections were conducted as scheduled. The Millennium inspection was slipped to FY 2012.

The status of our TSD, LQG, and MQG/SQG inspections for FY '09 are as follows:

- Longview Fibre - completed 12/22/10
- Chinook Ventures/Millennium* see below
- Grays Harbor Paper –completed 11/04/10
- Nippon Paper – completed 3/23/10; follow-up conducted on 4/26/11
- Port Townsend Paper – completed 1/20/11
- Sonoco – completed 6/22/11
- Sound Refining – completed 3/15/11
- Tenaska – completed 9/20/11

*Chinook Ventures was purchased by Millennium in January 2011. We've been working with Millennium to address a number of compliance issues created by the previous owner and to remove bulk materials left onsite. We plan to conduct a RCRA inspection at the facility in the next couple months as they transition to normal operations.

Permits

ConocoPhillips – Our heavy workload has prevented us from working on the permit renewal. We hope to be able to draft a new permit in FY13.

Refinery Oily Water Services – Our heavy workload has prevented us from sending letters to the four refineries requesting information on monitoring and maintenance programs for their oily water sewers. We are planning to send these letters in FY12.

Closure/Post-closure

Columbia Gorge Aluminum – The potliners and most of the buildings at Goldendale smelter have been demolished. We approved the clean closure of the Cathode Reduction and Demolition (CRUD) room in December 2011.

Intalco – We reviewed and approved the updated closure and post-closure plans for the Intalco hazardous waste landfill in July 2011. Intalco closed the landfill in the fall of 2011. We received the closure report on January 27, 2012.

Kaiser-Tacoma/Port of Tacoma – We sent out a public notice of our approval of the closure and post-closure plans for the RCRA Waste Storage Building and Spent Potliner Management Area at the former Kaiser-Tacoma smelter. We approved the clean closure of these units on August 30, 2011.

Enforcement/Corrective Action

Emerald Kalama – The soil vapor extraction (SVE) system operates at times when the water level is nine feet below ground or lower. The SVE shut down in mid-December 2010 and resumed operation in July 2011. The annual performance report was submitted in September 2011. We are reviewing the performance report.

The treatment system continues to operate as described in the CAP. We continue to regularly inspect the treatment system and review monitoring data.

Lilyblad – The treatment system has been in continuous operation for 18 months at the end of 2011. The first round of soil sampling was completed in November 2011. As of December 31, 2011, an estimated 6800 pounds of contaminants have been removed. The operation time will be increased to complete the site dewatering and achieve hydraulic control.

We continue to regularly inspect the treatment system and review monitoring data.

Chinook Ventures – We issued an enforcement order on October 8, 2010 for a number of dangerous waste violations at their Black Mud Pond. The new owner of the facility (Millennium) is working to address the violations to our satisfaction.

Acronym List

AO	Agreed Order
AOC	Area of Concern
BEI	Burlington Environmental, Inc.
BPA	Bonneville Power Administration
CA	Corrective Action
CAMP	Corrective Action Management Plan
CAP	Cleanup Action Plan
CD	Consent Decree
CESQG	Conditionally Exempt Small Quantity Generator
CL	Closure
CM	Compliance monitoring
CMS	Compliance monitoring with sampling
DAR	Delinquent annual reporters
EPA	U.S. Environmental Protection Agency
FS	Feasibility Study
FY	Fiscal year
IA	Interim action
IGC	Increased Generator Contact
LQG	Large quantity generator
MFA	Maintenance Facility Area
MQG	Medium quantity generator
NN	New notifier
NOD	Notice of determination
PCE	Perchloroethylene
PCP	Pentachlorophenol
PSC	Phillips Services Corporation
RC	Remedy Construction
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
SQG	Small quantity generator
SVE	Soil vapor extraction
SWMU	Solid waste management unit
TCE	Tetrachloroethylene
TCP	Toxics Cleanup Program
TEE	Terrestrial Ecological Evaluation
TSD	Treatment, storage, and disposal
TWAA	Taylor Way and Alexander Avenue fill area
TWP	Treated Wood Products area
UXO	Unexploded ordinances
VI	Vapor intrusion
XQG	No quantity generator
YTC	Yakima Training Center