

## RCRA COMPLIANCE EVALUATION INSPECTION REPORT

### 1) **Inspector and Author of Report**

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### 2) **Facility Information**

East Tennessee Technology Parkway  
Highway 58 & Blair Road  
Oak Ridge, Tennessee 37380-1703

EPA ID No.: TN0890090004/ HWSA Permit TNHW-165

NAICS: 562211 - Hazardous Waste Treatment & Disposal

### 3) **Primary Contact**

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4) **Inspection Participants**

|                                                  |                        |
|--------------------------------------------------|------------------------|
| Cheryl Saylor, Environmental Scientist           | CDM Smith              |
| Tony Poole, EC&P Operations Manager              | UCOR                   |
| Anna Castleberry, Waste Coordinator              | Strata-G               |
| Rick Dyer, Field Engineer                        | UCOR                   |
| Mary Magleby Waste Projects and Services Manager | UCOR                   |
| Robin Moss, Waste Packaging Specialist           | UCOR                   |
| Nick Axon, Waste Coordinator                     | UCOR                   |
| Curtis K. Barnhardt, ES&H Advisor                | Bechtel National, Inc. |
| Danny M. Cunningham, ES&H Engineer               | Vector Resources       |
| Amanda Mize, UPF Waste Coordinator               | Bechtel National, Inc. |
| Donna Cozart, Supervisor                         | CNS                    |
| Elizabeth Owens, Environmental Engineer          | CNS                    |
| Brad Skaggs, Manager, CAA/SW Compliance          | CNS                    |
| Pamela Rudd                                      | Knoxville TDEC         |
| Héctor M. Danois                                 | EPA Region 4           |

5) **Date and Time of Inspection**

August 26, 2020 @ 9:15 A.M.

6) **Applicable Regulations**

RCRA Sections 3005 and 3007; 40 Code of Federal Regulations (C.F.R.) Parts 260 - 266, 268, 270, 273, and 279; Tennessee Hazardous Waste Management Act, Tennessee Code Annotated (T.C.A.) 68-212 part 1 & 3 and the Used Oil Collection Act of 1993, T.C.A. 68-21; the Tennessee Hazardous Waste Management Regulations, Tennessee Rule Chapter 0400-12-01.

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2. [40 C.F.R. § 262.34(a)], a generator of 1,000 kilograms or greater of hazardous waste in a calendar month is a Large Quantity Generator (LQG) and may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2.(i)-(v) [40 C.F.R. § 262.34(a)(1)-(4)] (hereinafter referred to as the “LQG Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)5.(i) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 68-212-108 of the THWMA, Tenn. Code Ann. § 68-212-108 [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)2(iv) [40 C.F.R. § 262.34(a)], provided that the generator complies with the satellite accumulation area conditions listed in Tenn. Comp. R. & Regs. 0400-12-01-.03(4)(e)5(i)I [40 C.F.R. § 262.34(c)(1)(i)-(ii)] (hereinafter referred to as the “SAA Permit Exemption”).

Pursuant to Tenn. Comp. R. & Regs. 0400-12-01-.12(1)(b) [40 C.F.R. § 273.9 (2016)], a “Small Quantity Handler of Universal Waste” (SQHUW) is a Universal Waste handler who does not accumulate 5,000 kilograms or more of Universal Waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

As the State’s authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

**7) Purpose of Inspection**

This announced compliance evaluation inspection (CEI) was conducted to evaluate the facility’s compliance with applicable requirements of RCRA and corresponding Tennessee Department of Environment and Conservation (TDEC) regulations.

**8) Facility Description**

East Tennessee Technology Park (hereinafter as ETTP or facility) is one of the three major complexes located on the Department of Energy (DOE) federal reservation. Formerly known as K-25, the original mission of the ETTP was to produce uranium (enriched in the U-235 isotope) through gaseous diffusion to support the US nuclear power and weapons programs. The gaseous diffusion activities ended in 1987. While the DOE is no longer conducting any manufacturing or uranium processing activities, the 1992 Federal Facility Compliance Agreement requires the DOE Oak Ridge reservation to manage and dispose of their mixed waste following the site treatment plan. In support of Y-12 operations, Consolidated Nuclear Services (CNS) operates facilities at ETTP which include shipping, receiving, and construction support.

The U.S. Department of Energy owns the ETTP facility while URS/CH2M Oak Ridge, LLC (UCOR) currently operates waste management and closure activities at the ETTP site under contract with DOE. Recently, UCOR submitted closure documentation to the Division for termination of TNHW-165. No permitted storage areas remain at this location. ETTP is located on a 706-acre tract of land near the confluence of Poplar Creek and the Clinch River and is part of a 37,300-acre US Department of Energy federal reservation

ETTP most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated March 1, 2018, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, ETTP can generate hazardous waste streams, used oil and universal wastes (such as spent batteries, certain types of lamps and mercury-containing devices or equipment), waste solvent, spent aerosol cans, paint waste, and other wastes which include EPA Waste Codes D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D018, D019, D021, D022, D028, D029, D030, D032, D035, D039, D040, F001, F002, F003, F004, F005, F006, P004, P011, P012, P024, P030, P037, P047, P098, P106, U160, U210, U223, and U226.

**9) Previous Inspection History**

On October 30, 2018, TDEC conducted a RCRA CEI at the facility and no RCRA deficiencies were discovered.

## 10) **Opening Conference**

- |                                                                                                 |                                                                                                        |
|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Credentials Presented                                       | <input checked="" type="checkbox"/> CBI warning to facility provided                                   |
| <input type="checkbox"/> SBREFA fact sheet, if applicable                                       | <input type="checkbox"/> CBI was provided or discussed during the inspection                           |
| <input checked="" type="checkbox"/> Health and Safety, Personal Protective Equipment discussion | <input type="checkbox"/> Additional equipment that will be used, if applicable (FLIR camera, PID, FID) |

On August 26, 2020, the U.S. Environmental Protection Agency, Region 4 inspector, Héctor Danois, accompanied by Pamela Rudd, TDEC inspector, arrived at ETTP to inspect the facility to determine its compliance status with both RCRA and the State of Tennessee hazardous waste regulations. ETTP was represented by Mr. Skaggs and Ms. Sayler. Upon entering the facility, the inspectors introduced themselves, showed their credentials and explained the purpose of the visit and a description of the facility's process was discussed.

## 11) **Findings**

A brief explanation for the purpose of the inspection was given, as well as an introduction of the TDEC and the EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the inspection.

### **UCOR Areas**

UCOR is a DOE contractor working on the removal of facilities, conducting environmental cleanup at ETTP and overseeing waste management operations across the Oak Ridge Reservation.

#### **Building 1007 – Rad Protection**

Inside Building 1007, Room 1161 is one area used for the management of universal waste . At the time of the inspection, the inspection team observed a 5-gallon container of alkaline batteries for recycling and a 5-gallon container of universal waste batteries (empty).

#### **Building 1317 – Central Receiving**

This is where the facility keeps its aerosol can puncture device drum and stores universal waste. At the time of the inspection, the area was storing a 55-gallon drum (can puncture device drum) of paint waste in a SAA, and a container of scrap metal (empty cans). Before puncturing, the cans are stored in a metal cabinet for storage. All containers and cabinet were closed and labeled. No universal waste was present during the inspection.

#### **Area 1316 -General Support Complex**

##### **Building 1316 W**

This is the area where technicians store and maintain sampling equipment. At the time of the inspection, the inspection team noticed a 35-gallon container of used or expired indicator tubes

in a SAA, a 1-gallon container of universal waste batteries (dated), and a 5-gallon container of alkaline batteries. All containers were closed and labeled.

### **Building 1316J**

This is where workers conduct metal fabrication and refrigeration maintenance. At the time of the inspection, the inspection team noticed a 10-gallon container of used oil and spill kit. The container was labeled.

### **Building 1036**

This is the Power Integration Group area where technicians collect and stored universal waste. At the time of the inspection, the area was storing a 5-gallon container of alkaline batteries and a 35-gallon container of fuses (recycling). The containers were closed and labeled.

### **Building 1313M – Hazardous Waste Storage Area (HWSA)**

Located inside a small warehouse, this is one of the less than 90-days HWSA. At the time of the inspection, the area was empty. Across from the HWSA, the inspection team noticed a B25 box of mixed waste, a 5-gallon container of PCB ballast (closed and labeled), two 55-gallon containers of used oil (labeled), and 35-gallon containers of used oil (labeled).

The building is also used to store universal waste. At the time of the inspection, the area was storing a 1-gallon container of lead-acid batteries, a ½-gallon container of lithium-ion batteries, a 1-gallon container of 6V lead-acid batteries, a 7-gallon container of alkaline batteries, a 7-gallon container of Ni batteries, a box of universal waste lamps and two pallets of lead-acid batteries (oldest 2/17/20). The universal waste was closed, labeled, and dated (within a year).

The facility is conducting CERCLA site cleanup and waste generated from these activities is stored in this area. At the time of the inspection, the area was storing a 55-gallon aerosol can puncture device drum in a SAA, a 35-gallon drum of used filter cans (6/17/20), two 55-gallon drums of non-conforming aerosol cans (7/21/20, 7/21/20, and 6/17/20 ), a 55-gallon drum of filter socks/PPE (8/12/20), a 35-gallon drum of Purulia K fire extinguisher (6/11/20), a 35-gallon drum of a white acid crystal (6/15/20) and a 55-gallon drum (inside a spill jacket) of leaking lead-acid batteries (8/4/20). All containers were closed, dated, and labeled.

### **CNS Areas**

CNS is the managing and operating contractor for the Y-12 site, a DOE facility. Additionally, CNS is managing some areas (shipping, receiving, and construction support) at the ETPP complex, where they generate hazardous waste.

### **Building 1065E: UPF Receiving**

This area is used to receive supplies in support of the Uranium Processing Facility (UPF) construction at Y-12. Hazardous waste is primarily generated from the disposal of off-specification materials used in the UPF construction. At the time of the inspection, the SAA (SAA #3315) had two bags of off-specification material (sealer) and a bag of pipe joint

compound. The materials were managed as hazardous waste while determination analysis was pending. The bags were closed and labeled “hazardous waste-pending analysis.”

A less than 90-day HWSA (AA #3342) was located next to the SAA. At the time of the inspection, two 5-gallon containers of (fireproof) (7/1/20), two 1-gallon containers of carboline carboguard-Part B (7/1/20), a 1-gallon container of a container of carboline carboguard-Part A (7/1/20), a 10-gallon container of latex cleanup material (6/10/20), and a 55-gallon container of latex cleanup material (6/10/20) were in the HWSA. All containers were labeled hazardous waste, closed, and dated. A fire extinguisher and spill equipment were in the area. Personnel use cell phones and radios are utilized for emergency communication.

#### Building 9830-16: UPF Fabrication Facility

This area is 4.5 acres under roof. The area is where technicians weld and coat paint structural components used for UPF construction at Y-12. At the time of the inspection, there was a 55-gallon drum of carbozinc coating/grinding wheel waste in the SAA (SAA # 3409). The containers were closed and labeled.

A less than 90-day HWSA (AA #3538) was located next to the SAA. The HWSA was empty during the inspection. A fire extinguisher and spill equipment were in the area. Personnel use cell phones and radios are utilized for emergency communication.

#### Building 9830-16 Laydown Yard

The outside yard is located adjacent to the UPF Fabrication Facility. The outside yard is used to store equipment and materials. The facility keeps an SAA (SAA # 3407) inside of a plastic cabin igloo. At the time of inspection, the igloo was storing a 55-gallon aerosol can puncture device drum. The drum was closed and labeled. Used oil and filters are stored in 55-gallon drums. The drums were inside of a plastic cabin igloo. The drums were closed and labeled.

Universal waste is stored in a cargo shipment container (UW # 3408). At the time of the inspection, the container was storing a lead-acid battery waiting to be recycled.

#### Building 1650: Emergency Operations Center (EOC)

The EOC monitor site conditions, respond to abnormal events and provide command and control during the integrated response to an operational emergency at Y-12. Due to a lack of security clearance, the EPA inspector couldn't enter the building. Ms. Rudd escorted by Mr. Skaggs, entered the building, and found; the universal waste storage area for the collection of waste batteries is located here on the lower level of the building. This area was found empty.

#### Recordkeeping

Required and relevant paperwork were submitted digitally by the facility per request of the EPA and the TDEC. The following documents were reviewed off site following the site inspection: weekly inspections (2017-2020), manifests (2020), Transporter Permit (expiring 1/31/21), contingency plan/quick reference guide (2020), hazardous waste annual reports (2019), waste reduction plan (2019), waste determinations (2020) and personnel hazardous waste management

training documentation (2020).

**12) Closing Conference**

The RCRA inspectors completed their inspection on August 26, 2020. ETTP was inspected as an LQG. At the time of the inspection, the facility was operating as an LQG. On September 23, 2020, an out-briefing on the findings of the inspection was provided by Mr. Danois and Ms. Rudd to the inspection participants.

**13) Signed**

For:

\_\_\_\_\_  
Héctor M. Danois  
Inspector and Author of Report

\_\_\_\_\_  
Date

**14) Concurrence and Approval**

\_\_\_\_\_  
Alan A. Annicella  
Chief  
Land, Asbestos and Lead Section

\_\_\_\_\_  
Date