

# **Desk Instruction 2.11 “Environmental Reporting”**

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**Revision 0**

Approved by: \_\_\_\_\_

Date: \_\_\_\_\_

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## **1.0 Introduction**

Environmental reporting requirements are mandated by applicable laws and regulations. A majority of the key federal and/or state environmental laws have reporting requirements associated with them. It is the purpose of this desk instruction to outline the key environmental reporting requirements for the Office of River Protection (ORP). While ORP is responsible for collecting data from its ongoing activities for many of these reports, the Richland Operations Office (RL) has the actual reporting responsibility as the landlord for the Hanford Site.

## **2.0 Expectations**

The ESQ Environmental Division (ED) reviews and assimilates all data required for environmental reporting requirements for the Office of River Protection as required by DOE Orders and environmental laws and regulations.

## **3.0 Application**

This desk instruction applies to all ORP employees and contractors who have responsibility for providing data required for environmental reporting requirements.

## **4.0 Reports and Process**

The following is a listing of key environmental reporting requirements for the Hanford Site which are supported by ORP.

- **Resource Conservation and Recovery Act (RCRA) Reports:** There are two key reports required under RCRA. ORP personnel review all data and supporting records for completeness and consistency prior to transmitting to the Richland Operations Office. ORP works with both the contractors and regulators to ensure that RCRA Annual Reports are transmitted to the regulators and other interested parties in a timely and effective manner.
  - **Hanford Site Dangerous Waste Report** – This report is required by WAC 173-303 and must be completed by March 1<sup>st</sup>. The report includes dangerous waste generation and management activities for the previous calendar year. ORP staff verify the contractor’s input and provide the data to RL.
  - **Land Disposal Restrictions Report** – This report is required by 40 CFR 254-270 and WAC 173-303 and must be completed by April 30<sup>th</sup>. The report includes the status of hazardous waste treatment facilities, e.g. waste characteristics, process information, procedures to prevent hazards, and personnel training during the previous calendar year. ORP staff assesses contractor’s performance and provide input to RL.

- **Air Program Reporting:** Under the Clean Air Act Amendments (CAAA) and the site Air Operating Permit (AOP), DOE is required to make semi-annual and annual reports of its intermediate and continuous compliance with the terms and conditions of the AOP. Contractors are required to prepare the necessary reports and ORP reviews the data prior to transmittal to the Richland Operations Office for accuracy and responsiveness. These reports are transmitted to the Washington State Department of Health, EPA Region X, and the Benton County Clean Air Authority. The key reports which are transmitted to the regulatory agencies are listed under the National Environmental Standards for Hazardous Air Pollutants below.

- **National Environmental Standards for Hazardous Air Pollutants (NESHAPS)**

The CAAA require EPA to promulgate an extensive number of regulations establishing maximum achievable control technology (MACT) standards for 160 source categories emitting one or more of the 189 hazardous air pollutants under the Act. The NESHAPS requires DOE to submit quarterly reports on radioactive stack emissions and an annual report on radiations emissions and an annual non-radiological report. The NESHAPS Quarterly Status Report is due to the Washington State Department of Health by Friday of the first full week of the second month following the end of the calendar quarter

- **National Environmental Policy Act (NEPA):** The NEPA regulations establish a NEPA Compliance Officer. At the Hanford site, the NEPA compliance officer is a member of Richland Operations Office (RL) Regulatory Compliance and Analysis Division. ORP staff coordinate ORP NEPA activities with the Compliance Officer. ORP provides data for the following annual report.
  - **National Environmental Policy Act Planning Summary** - This annual report is required by DOE Order 231.1 and 451.1B and must be completed by the end of January. ORP staff submit information to Hanford Compliance Officer for input to the report. The report describes the status of on-going ORP NEPA compliance activities (EAs required in next 12 months, EISs needed in next 24 months, schedule for completion and cost of each NEPA review, completed EAs and EIS during previous CY, and a site-wide EIS evaluation).
- **Environmental Prevention and Community Right-to-Know Act (EPCRA):** EPCRA Sections 311-312 apply to the requirements for Community Right-to-Know Reporting. Sections 311 and 312 establish reporting requirements which provide the public with important information on the hazardous chemicals in their communities. Section 313 of EPCRA also requires reporting on release of routine toxic chemical emissions during the previous calendar year. Two key reports are provided on an annual basis under EPCRA.

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- **Hanford Site Tier II Emergency and Hazardous Chemical Inventory** – The report is required by EPCRA Section 312 and 40 CFR 370.41 and must be completed by March 1<sup>st</sup>. The report includes an emergency and hazardous chemical inventory for chemicals stored in the previous calendar year above threshold quantities listed in the regulations. ORP staff review contractor's data and provide comments to RL.
- **Toxic Chemical Release Inventory Report** – This report is required by EPCRA Section 313 and 40 CFR 372 and must be completed by July first. The report includes releases during the previous calendar year of routine toxic chemical emissions. ORP staff review contractor's data and provide comments to RL.
- **Toxic Substances Control Act (TSCA):** TSCA regulates toxic substances such as asbestos and polychlorinated biphenyls (PCBs). Two annual reports are currently required for activities at the Hanford site under TSCA.
  - **PCB Annual Document Log** - A PCB Annual Document Log is required to be prepared and maintained in accordance with 40 CFR 761.180. The PCB Annual Document Log is maintained for the Hanford Site and is required to be prepared by July 1<sup>st</sup> of each year for the previous calendar year and is to be retained for three years after the facility ceases using or storing PCBs.
  - **PCB Annual Report** - A PCB Annual Report is required to be prepared and maintained in accordance with 40 CFR 761.180(b)(1). The PCB Annual Report is required to be prepared each year for the previous calendar year.
- **Additional Reports:** Additional reporting requirements are also required by either state regulations or DOE Orders. The following are examples of other reports which may be required to be completed within the calendar year.
  - **Hanford Site Environmental Report** – This report is required by DOE Manual 231.1-1 and DOE Order 5400.5, Radiation Protection of the Public and the Environment, ES&H Reporting and annual updates must be completed by March. ORP staff receive updates from its contractors. The report includes waste tank status (leakage, number of tanks stabilized/characterized), tank closure acceleration (supplemental waste treatment technologies), vadose zone characterization, SST farms monitoring (contaminant plumes), and Waste Treatment Plant construction. The report is authored by the Pacific Northwest National Laboratory.
  - **State Wastewater Discharge Reports** - Washington Administrative Code 173-215 and 173-218 require wastewater discharges to land surfaces be managed in accordance with the State Waste Discharge Permit Program or the Underground Injection Control Program. Hanford's seven State Waste Discharge Permits have requirements for submitting discharge monitoring reports on a quarterly basis. ORP holds two of these seven permits and must provide input for the quarterly

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reports. RL has delegated authority for preparation of these reports to the Project Hanford Management Contractor.

- **Inventory of Federal Hazardous Waste Facilities (RCRA Section 3016 Bi-Annual Report)** - According to Section 3016, each federal agency is required every two years to submit to the Administrator a list of sites owned or operated by the agency at which hazardous waste is treated, stored, disposed of, or has been disposed of at any time. If any federal agency fails to submit an inventory to the Administrator, the statute authorizes the Administrator to complete the inventory.
- **Projections of Anticipated Costs for Closure/Post-closure (40 CFR Part 258 Financial Assurance Mechanisms for Local Government Owners and Operators of Municipal Solid Waste Landfill Facilities)** - Under subtitle D, the financial assurance provisions require owners and operators of municipal solid waste landfills to demonstrate that adequate funds will be readily available for the costs of closure, post-closure care, and corrective action for known releases associated with their facilities. Use of the financial test allows a local government to use its financial strength to avoid incurring the expenses associated with the use of a third-party financial instrument. Demonstrating that the costs of closure, post-closure care, and corrective action for known releases are available protects the environment by assuring that landfills will be properly managed at the end of site life when revenues are no longer being generated and physical structures may begin to break down.

Generally, environmental data and reporting requirements are met by following the steps provided below:

| <b>Step #</b> | <b>Description</b>   | <b>Performer</b>                                     | <b>Support</b>                             |
|---------------|--|--|--|
| <b>Step 1</b> | Transmit data to ORP   | Contractor   | N/A  |
| <b>Step 2</b> | Receive reporting data from contractor for review.   | Environmental Compliance Subject Matter Expert (SME) | Mission Element Contractor                 |
| <b>Step 3</b> | Determine review team to review data (if needed) based on the technical depth of data received. Distribute documentation to team (if team is needed).<br><br><b>Note:</b> Review Team may consist of Environmental Compliance Subject Matter Expert, Legal Counsel, affected Mission Elements, and Support Services staff. | Environmental Compliance SME                         | Mission Elements (Line Organization) Legal |

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| <b>Step 4</b> | Review the data for acceptability (using appropriate guidance and regulatory review criteria).                                    | Review Team<br>Environmental<br>Compliance SME | Contractor       |
| <b>Step 5</b> | If information is not acceptable, transmit data and comments back to contractor for resolution. If data is acceptable, go step 6. | Environmental<br>Compliance SME                | N/A              |
| <b>Step 6</b> | Receive formal certified contractor submittal (if required) for data.   | Environmental<br>Compliance SME                | Mission Elements |
| <b>Step 7</b> | Prepare correspondence transmitting data to RL for site-wide report.  | Environmental<br>Compliance SME                | Mission Elements |