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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 20, 2016

16-NWP-175

By certified mail

Mr. Doug S. Shoop, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

Re: Dangerous Waste Compliance Inspection on June 13, 2016, at the Central Waste Complex,
RCRA Site ID: WA7890008967, NWP Compliance Index No. 16.575

Dear Mr. Shoop and Mr. Ciucci:

The purpose of this letter is to document the Department of Ecology's (Ecology's) findings during the recent dangerous waste compliance inspection at the Central Waste Complex on June 13, 2016, to determine compliance with the Interim Status Standards under 40 CFR 265 and chapters of Washington Administrative Code (WAC) 173-303 for dangerous waste management, as incorporated and modified by WAC 173-303-400.

Ecology conducted this inspection under the authority to regulate dangerous waste as defined by WAC 173-303-040 and provided by Revised Code of Washington 70.105.109. These regulations establish a system for safe and responsible management of dangerous waste.

Results of Inspection

Based on Ecology's observations, interviews, and documentation provided by United States Department of Energy – Richland Operations Office (USDOE-RL) and CH2M Hill Plateau Remediation Company (CHPRC), Ecology has identified an area of non-compliance. Ecology concluded that the following area of non-compliance at the Central Waste Complex has been previously identified by Ecology and the United States Environmental Protection Agency as an area of non-compliance at the Central Waste Complex.

1. Ecology observed that the front side of Container #Z7610-210 showed signs of deterioration, and rust had accumulated beneath the container. Ecology observed that the back side of Container #Z7610-210 showed additional degradation. On the back side of Container #Z7610-210, Ecology also observed corroded metal separating from the container, splitting seams, and bent metal. (See enclosed photos.)



Mr. Shoop and Mr. Ciucci
October 20, 2016
Page 2 of 3

16-NWP-175
Central Waste Complex
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 16.575
Inspection Date: June 13, 2016

Immediate Actions

The area of non-compliance listed above, requires immediate attention and responsive actions by USDOE-RL and CHPRC. Action, as listed below, must be completed immediately upon receipt of this letter. Within 30 days upon receipt of this letter, USDOE-RL and CHPRC must provide documentation to Ecology that shows actions have been completed.

1. **40 CFR 265.171. Condition of containers.** Transfer the dangerous waste stored within Container #Z7610-210 to a container that is in good condition or overpack Container #Z7610-210 into a container that is in good condition.

You may request an extension to the schedule provided above. Submit the request in writing to me prior to the due date. The written request must include a proposed schedule and a detailed explanation for the request.

Administrative Actions

Failure to correct the deficiencies may result in an administrative order, a penalty, or both, as provided by the Hazardous Waste Management Act (Revised Code of Washington 70.105.080 and .095). Persons who fail to comply with any provision of this chapter are subject to penalties of up to \$10,000 per day per violation.

If you have questions or need further information, please contact me at (509) 372-7921 or john.price@ecy.wa.gov, or Kathy Conaway, Dangerous Waste Compliance Inspector, at kathy.conaway@ecy.wa.gov or (509) 372-7890.

Sincerely,



John B. Price, Section Manager
Tri-Party Agreement Section
Nuclear Waste Program

tkb

Enclosure

cc: See page 3

Mr. Shoop and Mr. Ciucci
October 20, 2016
Page 3 of 3

16-NWP-175
Central Waste Complex
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 16.575
Inspection Date: June 13, 2016

cc electronic w/enc:

Dave Bartus, EPA
Jack Boller, EPA
Dennis Faulk, EPA
Duane Carter, USDOE
Cliff Clark, USDOE
Michael Collins, USDOE
Al Farabee, USDOE
Tony McKarns, USDOE
Julie Reddick, USDOE
Wade Woolery, USDOE
Allison Wright, USDOE
Stuart Mortensen, CHPRC
Joel Williams, Jr., CHPRC
Jon Perry, MSA
Ken Niles, ODOE
Shawna Berven, DOH
John Martell, DOH
Debra Alexander, Ecology
Kathy Conaway, Ecology
Suzanne Dahl, Ecology

Stuart Luttrell, Ecology
Jared Mathey, Ecology
John Price, Ecology
Ron Skinnerland, Ecology
Alex Smith, Ecology
John Temple, Ecology
CHPRC Correspondence Control
Environmental Portal
Hanford Facility Operating Record

cc w/enc:

Steve Hudson, HAB
Administrative Record
NWP Central File
NWP Compliance Index File: 16.575

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN



Photo #DSC01341, Z7610-210 labeling (front side)



Photo #DSC01343, Z7610-210 (front side)



Photo #DSC01345, Z7610-210 (back side)



Photo #DSC01345, Z7610-210 (back side)



Photo #DSC00783, Z7610-210 (front side)



Photo #DSC01068, Z7610-210 (front side)