



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

16-ESQ-0044

FEB 26 2016

Ms. S. L. Dahl-Crumpler  
Nuclear Waste Program  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Dahl-Crumpler:

**HANFORD FACILITY NONCOMPLIANCE REPORT FOR CALENDAR YEAR (CY) 2015  
(PERMIT CONDITION I.E.19)**

This letter serves as the Hanford Facility Noncompliance Report for CY 2015, submitted to meet the March 1, 2016, due date specified in the Hanford Facility Resource Conservation and Recovery Act Permit, WA7890008967 (Permit) Condition I.E.19. Permit Condition I.E.19 states: "The Permittees shall report to Ecology all instances of noncompliance, not otherwise required to be reported elsewhere in this Permit, at the time the Annual Dangerous Waste Report is submitted." This Permit condition is interpreted to mean instances of noncompliance with the Permit, associated with treatment, storage, and/or disposal units incorporated in Revision 8C of the Permit. Noncompliances with the Permit conditions alleged by the Washington State Department of Ecology or reported by the Permittees through Notices of Violation, Notices of Correction, Inspection Reports, Project Manager Meeting Minutes, or other written correspondence are excluded from this report.

There are two noncompliances to report for CY 2015. Information regarding the noncompliances is provided in the enclosure.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,

A handwritten signature in black ink that reads "Stacy Charboneau". The signature is written in a cursive style.

Stacy Charboneau  
Manager

ESQ:ACM

Enclosure

cc: See page 2

Ms. S. L. Dahl-Crumpler  
16-ESQ-0044

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cc w/encl:

A. S. Carlson, Ecology

B. L. Curn, BNI

L. J. Cusack, CHPRC

B. G. Erlandson, BNI

D. Faulk, BNI

J. A. Hedges, Ecology

J. A. Joyner, WRPS

A. L. Kapell, Ecology

R. J. Landon, BNI

J. A. Lerch, WCH

J. J. Lyon, Ecology

H. T. Tilden, PNNL

C. L. Whalen, Ecology

M. B. Wilson, MSA

Administrative Record, H6-08 (TSD: H-0-1, T-2-6)

Ecology NWP Library

Environmental Portal, LMSI, G3-39

HF Operating Record A3-01 (J. Perry, MSA)

ENCLOSURE

**HANFORD FACILITY NONCOMPLIANCE REPORT FOR CALENDAR YEAR 2015**

Consisting of 2 pages,  
including this cover page

Permit Condition (WA/890008967)	Description of Noncompliance <sup>1</sup>	Causes <sup>1</sup>	Period <sup>1</sup> Period of noncompliance, including dates and times	Time expected to continue <sup>1</sup> This reporting criterion applies if the noncompliance has not been corrected	Corrections <sup>1</sup> Steps taken or planned to reduce, eliminate, and prevent reoccurrence
Part III, Operating Unit Group 4, 242-A Evaporator Chapter 6, Table 6.2	<p>In response to the September 2015 Ecology compliance inspection record request, WRPS discovered that weekly inspections of the PPE was not captured as being performed in the action tracking system.</p> <p>NOTE: PPE is checked and restocked as necessary at the 242-A Evaporator to support normal work activities, and emergency response actions were not impacted. Additionally, the Hanford Fire Department provides their own PPE when responding to an emergency event at the 242-A Evaporator.</p>	An error in the coding of the action tracker system.	May 2014 through September 2015	N/A	The coding in the action tracker system was corrected, and PPE inspections are being performed according to the weekly frequency identified in Table 6.2. In addition, the noncompliance was documented in the unit-specific operating record.
Part III, Operating Unit Group 4, 242-A Evaporator Chapter 7, Section 7.4.4	The location specified in Section 7.4.4 of the Permit for the respirators was incorrect.	Respirators were moved before the permit modification was completed.	March 2015 through November 12, 2015 (The permit modification request was initially provided to Ecology on April 5, 2015.)	N/A	<p>The permit was modified to indicate the correct location for the respirators.</p> <p>In April, a Class I Permit modification request was provided to Ecology for initial review and discussion and documentation was placed in the unit specific operating record (as required by I.E.15.d). On November 12, 2015, a final Class I permit modification request was submitted to Ecology as required by WAC 173-303-830(4)(a)(i)(A). Ecology concurred with the modification on December 18, 2015.</p>

<sup>1</sup> Reporting criteria are derived from WAC 173-303-810(14)(g)