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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 9, 2015

15-NWP-199

By certified mail

Ms. Stacy Charboneau, 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

T-2-7 Re: Response to Areas of Non-compliance from the T Plant Complex Dangerous Waste Compliance Inspection

1230847 Reference: Letter 15-ESQ-0100, received August 13, 2015, from S. Charboneau, USDOE-RL, to J. A. Hedges, Ecology, "Response to the Dangerous Waste Compliance Inspection on January 22, 2015, at the T Plant Complex, Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.513 Compliance Problems and Concerns, dated June 11, 2015"

Dear Ms. Charboneau and Mr. Ciucci:

The Department of Ecology's (Ecology) dangerous waste compliance inspection was conducted at the T Plant Complex on January 22, 2015, to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 Washington Administrative Code [WAC]). The regulations establish a system for safe and responsible management of dangerous waste.

During this inspection, several areas did not comply with the Dangerous Waste Regulations. The areas of non-compliance were provided to you in the Compliance Report, NWP Index No. 15.513, dated June 11, 2015. This letter provides notification that Ecology is closing out four of the six areas of non-compliance.

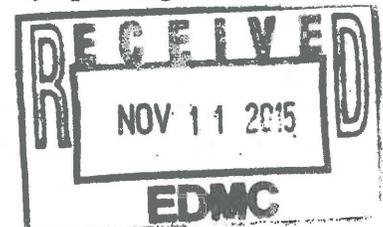
I reviewed the referenced response letter and enclosures for the other two identified areas of non-compliance. As a result of that review, I have adjusted the actions required to return to compliance below.

1. **WAC 173-303-380(1):** Failure to maintain required records in the facility operating record.

No further action is required.

2. **WAC 173-303-380(3)(a):** Failure to furnish records upon request.

No further action is required.



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3. **WAC 173-303-400, and by reference, WAC 173-303-320(2)(d):** Failure to document a weekly inspection.

Returned to Compliance - No further action required.

4. **WAC 173-303-400, and by reference, WAC 173-303-320(2)(d):** Failure to list the date and nature of any repairs or remedial actions. After reviewing the U.S. Department of Energy – Richland Operation Office’s (USDOE-RL) and CH2M HILL Plateau Remediation Company’s (CHPRC) response, Ecology understands that no repair or remedial action for the crack in containment system occurred, and the containment system repair remains incomplete. Stating that the information documented on an inspection record is “erroneous” does not remedy the non-compliance or result in a return to compliance. The observation and required actions are amended as follows:

Observation: I observed that the inspector documented the condition of “Containment systems are free of cracks, gaps, deterioration” as “SAT” on the 11/20/2014 inspection record. I observed the response provided by USDOE-RL/CHPRC on 8/13/2015 states that floor repairs have not been completed.

Required Action: Place a notation in the T Plant operating record documenting that the inspection record for 11/20/2014 recorded an observation of the containment system as SAT for 214-T, and that the recorded observation was incorrect. Submit a copy of the documentation placed in the T Plant operating record, including the date the documentation was placed into the operating record, to Ecology within 15 days of receipt of this letter.

5. **WAC 173-303-400, and by reference, WAC 173-303-330(2):** Failure to include the job title/position for all personnel who perform dangerous waste tasks associated with T Plant in the T Plant Dangerous Waste Training Plan. Ecology issued letter, 15-NWP-169, sent September 15, 2015. In our letter, Ecology stated the following, which includes the T Plant training plan area of non-compliance:

The violations at these units will remain open violations and will be absorbed into the upcoming site-wide training inspection. No response or action is required for USDOE-RL and CHPRC for the training violations at this time.

6. **WAC 173-303-400, and by reference, WAC 173-303-630(3):** Failure to label dangerous waste containers with the major risk.

No further action required.

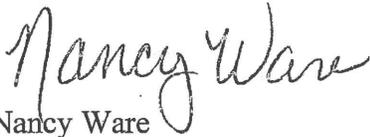
Failure to correct the areas of non-compliance may result in an administrative order, a penalty, or both, as provided by the Hazardous Waste Management Act (Revised Code of Washington 70.105.080 and .095). Persons who fail to comply with any provision of this chapter are subject to penalties of up to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

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If you have questions, need to request an extension, or need further information, please contact me at nancy.ware@ecy.wa.gov or (509) 372-7912.

Sincerely,



Nancy Ware
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tkb

cc electronic:

Dave Bartus, EPA
Jack Boller, EPA
Dennis Faulk, EPA
Cliff Clark, USDOE
Michael Collins, USDOE
Laura Cusack, CHPRC
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Nancy Ware, Ecology
Environmental Portal
Hanford Facility Operating Record

cc: Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell, Jim, YN
Steve Hudson, HAB
Administrative Record
CHPRC Correspondence Control
NWP Central File
NWP Compliance Index File: 15.513