

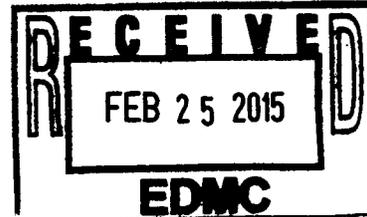


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OFFICE OF RIVER PROTECTIONP.O. Box 450, MSIN H6-60
Richland, Washington 99352**FEB 24 2015**

15-ECD-0009

Mr. J.M. St. Julian
Project Manager
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99354



Mr. St. Julian:

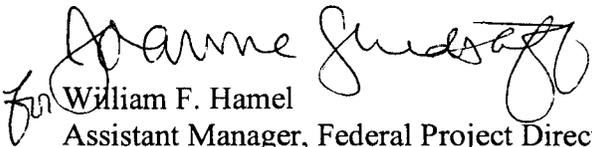
CONTRACT NO. DE-AC27-01RV14136 – SUBMITTAL OF U.S. DEPARTMENT OF ENERGY, OFFICE OF RIVER PROTECTION ASSESSMENT REPORT S-15-ECD-RPPWTP-001, DANGEROUS WASTE REPORT DATA PACKAGE FOR CALENDAR YEAR 2014

Reference: ORP letter from J.R. Eschenberg to W.S. Elkins, BNI, "Notification of Dangerous Waste Permit (DWP) Condition/Waste Management Surveillances," 06-ED-019, dated March 6, 2006.

This letter transmits the Waste Treatment and Immobilization Plant Dangerous Waste Report Data Package for calendar year 2014 assessment. The purpose of the assessment was to verify that information within the Solid Waste Information and Tracking System was complete and accurate. The assessment team identified no findings and one opportunity for improvement.

The action taken herein is considered to be within the scope of work of the existing contract and does not authorize the Contractor to incur any additional costs (either direct or indirect) or delay delivery to the Government. If the Contractor considers that carrying out this action will increase contract/project costs or delay of delivery, the Contractor shall promptly notify the Contracting Officer orally, confirming and explaining the notification in writing within ten (10) calendar days, and otherwise comply with the requirements of the Contract clause entitled **52.243-7**, -- "Notification of Changes." Following submission of the written notice of impacts, the Contractor shall await further direction from the Contracting Officer.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Environmental Compliance Division, (509) 376-7828.


for William F. Hamel
Assistant Manager, Federal Project Director
Waste Treatment and Immobilization Plant

ECD:GMN

Attachment

cc: See page 2

Mr. J.M. St. Julian
15-ECD-0009

-2-

FEB 24 2015

cc w/attach:

B.G. Erlandson, BNI

M.G. McCullough, BNI

S.L. Dahl, Ecology

Administrative Record (H-0-8)

BNI Correspondence

Environmental Portal, LMSI

Attachment
15-ECD-0009
(2 Pages)

Waste Treatment and Immobilization Plant Dangerous Waste Report
Data Package for Calendar Year 2014

Assessment Report S-15-ECD-RPPWTP-001

**U.S. Department of Energy
Office of River Protection**

Assessment Report Number: S-15-ECD-RPPWTP-001

Division Performing the Assessment: Environmental Compliance Division

Integrated Assessment Schedule Number: 15026

Title of Assessment: Waste Treatment and Immobilization Plant
Dangerous Waste Report Data Package for
Calendar Year 2014

Dates of Assessment: February 9, 2015, through February 20, 2015

Assessment Lead: Gae Neath, Environmental Compliance Division
Resource Conservation and Recovery Act
Permitting

Team Member(s) (if any): Don Sommer, Environmental Compliance
Division Environmental Support

Scope: Verify that information within the Solid Waste Information and Tracking System (SWITS) was complete and accurate. Review a random sampling of SWITS reports against the waste records found in the Integrated Document Management System (IDMS).

Document Reviewed:

- SWITS Annual Dangerous Waste Report (ADWR) Waste Certification Report For Certification Group: For Reporting Year: 2014, SWITS ADWR Generation, January 20, 2015, 09:44 a.m.

Discussion of Area(s) or Activities Reviewed: U.S. Department of Energy, Office of River Protection Environmental Compliance Division staff reviewed a random sampling of SWITS reports against the waste records found in the IDMS. Ten waste records were verified against the SWITS for Waste Treatment and Immobilization Plant (WTP) shipments.

The following table identifies the WTP container records that were examined:

Sample Number	Report Page Number	Source Facility	Shipment Document Number	Package Identification Number	RCRA Reportable Date	IDMS Record Compliant
1	1	WTP	WT162	WTP-14-100-05	06/24/14	Y
2	3	WTP	WT162	WTP-14-065-10	06/24/14	Y
3	5	WTP	WT164	WTP-14-148-02	07/22/14	Y
4	7	WTP	WT179	WTP-12-362-03	11/11/14	Y
5	9	WTP	WT156	0088602	03/04/14	Y
6	12	WTP	WT154	0088191	01/07/14	Y
7	16	WTP	WT157	0088766	04/29/14	Y
8	20	WTP	WT171	0088643	09/16/14	Y

9	22	WTP	WT156	0088146	03/04/14	Y
10	24	WTP	WT181	0087940	12/09/14	*Y
* WTP record was added to IDMS by Lockheed Martin Services, Inc. staff during the course of this assessment.						

Summary of Findings, Opportunities for Improvement, or Assessment Follow-up Items:
No findings and one opportunity for improvement were identified.

S-15-ECD-RPPWTP-001-O01 (Neath) - Need for records to be readily available for review in IDMS.

Discussion: When looking at opportunities for improvement for a record that had to be scanned in during this assessment, it would be beneficial for the contractor to plan ahead and scan all records into IDMS prior to distribution of the ADWR.

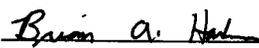
The transition of the hard copy storage of the waste records to an electronic copy of the waste records in the IDMS made the assessment review more efficient than in the past. The waste records were checked for the following information:

- Source facility
- Shipment document number
- Package identification number
- Resource Conservation and Recovery Act reportable date
- Current location
- Waste weight
- Dangerous Waste Numbers
- Dangerous waste code(s).

Conclusion: The assessment team found that the information within the SWITS report was accurate and complete.

Signatures:

Lead Assessor:  Date: 02/18/2015

Assessor's Manager:  Date: 2/20/15