



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

MAR 20 2019

19-ESQ-0054

Ms. Alexandra K. Smith, Program Manager  
 Nuclear Waste Program  
 Washington State Department of Ecology  
 3100 Port of Benton Boulevard  
 Richland, Washington 99354

Dear Ms. Smith:

#### MAJOR RISK LABELING PATH FORWARD

Since September 13, 2018, the U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) have participated in a series of five meetings with your staff to discuss major risk labeling of dangerous waste containers generated or stored by CHPRC. This collaborative effort has resulted in an agreement for implementation of major risk labeling amendments to Washington Administrative Code (WAC) 173-303. It is noted that in the amended WAC, the term major risk label is replaced with hazard label. This includes the following actions:

- Place toxic major risk labels on the 22 containers referenced by the Washington State Department of Ecology (Ecology) inspection reports. (Completed)
- Revise and provide to Ecology for information, CHPRC Waste Program Procedures with instructions to label newly generated dangerous waste in accordance with the amended WAC 173-303 requirements, including use of the toxic hazard label.
  - HNF-EP-0063, "Hanford Site Solid Waste Acceptance Criteria"
  - PRC-PRO-EP-15333, "Environmental Protection Processes"
  - PRC-PRO-40520, "Regulated Waste Generation and Storage and associated checklists"
  - PRC-PRO-WM-53692, "Waste Planning, Packaging, and Labeling"
  - PRC-PRO-WM-40523, "Solid Waste Operations Complex (SWOC) Waste Acceptance Program"
- Revise and provide to Ecology for information, SWOC Overpack Procedures with instructions to label overpacked containers in accordance with the new regulatory requirements, including use of the toxic hazard label.

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D-2-9, T-2-7, TS-2-4

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- SW-100-095, "Overpack Containers"
- DO-100-129, "Shipping, Receiving, and Relocating Waste"
- WRAP-PRO-OP-51968, "Move Containers Throughout WRAP Facility"
- Place the applicable hazard label for ignitable, reactive, corrosive, and/or toxic on existing T Plant dangerous waste containers and tanks, and document in Project Managers Meeting minutes. Alternatively, hazard labels can be placed on access doors to dangerous waste tank systems.
- Maintain hazard labels on all containers at SWOC that exhibit the characteristics of ignitable, corrosive, and/or reactive.
- Ecology will draft hazard labeling permit conditions for the Hanford Facility Resource Conservation and Recovery Act Permit for the remaining SWOC inventory to implement dangerous waste container relabeling when M-091 processing restarts. These conditions would point to and be consistent with the M-091 schedule for processing. This would include revising Transuranic Repackaging Project Container Management and Acceptable Knowledge Review (currently WMP-400 Section 7.1.7) when waste batching activities restart.

The proposed amendments to WAC 173-303 were adopted on January 28, 2019, and will be effective on April 28, 2019. The bulleted action items listed above will be completed within the implementation period (or effective date).

If you have any questions, please contact me, or your staff may contact Brian J. Stickney, Assistant Manager for Safety and Environment, on (509) 376-9079.

Sincerely,



Brian T. Vance  
Manager

ESQ:AKW

cc: See page 3

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cc: Debra J. Alexander, Ecology  
Dave B. Bartus, EPA  
Jack Bell, NPT  
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Stephanie K. Johansen, CHPRC  
Matt Johnson, CTUIR  
Jared W. Mathey, Ecology  
John B. Price, Ecology  
Administrative Record, TSD: D-2-9,  
T-2-7 and TS-2-4  
Ecology NWP Library  
Environmental Portal, G3-35  
HF Operating Record (J. K. Perry, MSA, A3-01)