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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

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April 12, 2017

17-NWP-042

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

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

Re: Department of Ecology (Ecology) Review of Response to Closure Notice for Container Storage Areas Located in the 400 Area Waste Management Unit (WMU)

References: See page 2

Dear Mr. Shoop and Mr. Blackford:

Ecology has reviewed your response letter received on February 1, 2017 (reference 1). Your letter included a request for an extension of one year, to January 27, 2018, to evaluate closure of the 400 Area WMU, and to determine the appropriate closure process for this treatment, storage, and disposal unit.

As of March 3, 2017, (reference 2) Ecology has determined that your response letter does not comply with the requirements of Washington Administrative Code (WAC) 173-303-610(3)(c)(ii)(A), or provide all of the necessary information that Ecology requested in the letter sent to you (reference 3). The missing information is in the following areas:

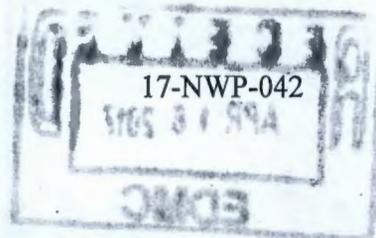
- The stated purposes of the requested extension.
- The lack of fixed date for the start of closure.
- The demonstration that the unit has additional capacity to receive wastes.
- The demonstration that you have taken, and will continue to take, all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements.

In accordance with the Site-wide Permit, Part III, OUG-16, Addendum H, Closure Plan, and pursuant to WAC 173-303-610(3)(c), facility operators must notify Ecology prior to beginning either partial or final closure of container storage areas located in the 400 Area WMU: the Interim Storage Area and Fuel Storage Facility.

Please notify Ecology in writing within 30 days of receipt of this letter of your intentions with regard to these units.



Mr. Shoop and Mr. Blackford  
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Not correcting areas of non-compliance may result in an escalation of enforcement and the issuance of an administrative order, a penalty (up to \$10,000 per day, per violation), or both, as provided by the Hazardous Waste Management Act (Revised Code of Washington 70.105.080 and 095).

If you have questions or need further information, please contact me at (509) 372-7890 or [Kathy.conaway@ecy.wa.gov](mailto:Kathy.conaway@ecy.wa.gov).

Sincerely,

*Kathy Conaway*

Kathy Conaway  
 Program Compliance Lead  
 Nuclear Waste Program

Reference 1: Letter 17-ESQ-0030, received February 6, 2017, "Response to Closure Notice of Container Storage Areas Located in the 400 Area Management Unit"

Reference 2: Email proving additional detail on deficiencies, dated March 3, 2017, from Kathy Conaway, Ecology, to Al Farabee, USDOE, "Response to Closure Guidance"

Reference 3: Letter 16-NWP-207, dated December 1, 2016, "Closure Notice for Container Storage Areas Located in the 400 Area Management Unit"

cc electronic:

Dave Bartus, EPA  
 Jack Boller, EPA  
 Dennis Faulk, EPA  
 Kevin Schanilec, EPA  
 Al Farabee, USDOE  
 Darin Corriell, CHPRC  
 Laura Cusack, CHPRC  
 Moses Jaraysi, CHPRC  
 Connie Simiele, CHPRC  
 Deborah Singleton, CHPRC  
 Joel Williams, CHPRC  
 Jerry Cammann, MSA  
 Jon Perry, MSA  
 Debra Alexander, Ecology  
 Kathy Conaway, Ecology  
 Jared Mathey, Ecology  
 John Price, Ecology  
 Stephanie Schleif, Ecology  
 Ron Skinnerland, Ecology  
 Katie Wilson, Ecology  
 CHPRC Correspondence Control  
 Environmental Portal  
 Hanford Facility Operating Record

cc: Rod Skeen, CTUIR  
 Gabriel Bohnce, NPT  
 Russell Jim, YN  
 Susan Leckband, HAB  
 Administrative Record  
 NWP Central File  
 NWP Compliance Index File