



1230511

[0080606H]

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 20, 2015

15-NWP-134

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

Re: Dangerous Waste Compliance Inspections on June 22, 2015 at Low Level Burial Grounds – Green Islands (LLBG-GI) and Non-Radioactive Dangerous Waste Landfill (NRDWL), RCRA Site ID: WA7890008967, NWP Compliance Index Nos.: 15.534 and 15.535

Dear Ms. Charboneau and Mr. Ciucci:

Thank you for your time during the recent inspections to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 Washington Administrative Code). These regulations establish a system for safe and responsible management of dangerous waste.

The Department of Ecology's (Ecology) Compliance Reports of the referenced inspections are enclosed. The LLBG-GI Report has one concern listed. The NRDWL Report cites one violation that did not comply with the Dangerous Waste Regulations. The violation and the action required for compliance is listed in the Compliance Problems section of the NRDWL Report.

To achieve compliance, complete the action required in the NRDWL Report and return the completed Compliance Certificate to Ecology within 60 days of receipt of the Report. Submit the completed Compliance Certificate, along with any requested documentation, to Nancy Ware at 3100 Port of Benton Boulevard, Richland, Washington 99354.

Failure to correct the deficiencies 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.

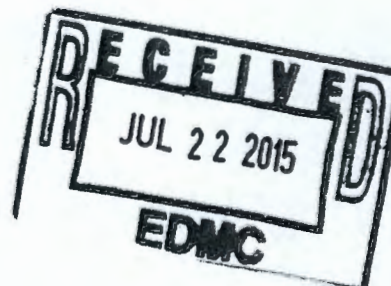
If you have questions or need further information, please contact me at nancy.ware@ecy.wa.gov or (509) 372-7912.

Sincerely,

Nancy Ware
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tkb
Enclosures

cc: See page 2

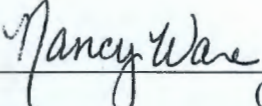


**Washington Department of Ecology
Nuclear Waste Program
Compliance Report**

Site: **LOW LEVEL BURIAL GROUNDS GREEN ISLANDS
(LLBG-GI)**
RCRA Site ID: **WA7890008967**
Inspection Date: June 22, 2015
Site Contacts: Joel Williams, Regulatory Inspection Lead,
CH2MHILL Plateau Remediation Company (CHPRC)
Phone: (509) 376-4782 **FAX:** N/A
Site Location: 200 Area, Hanford Site
Benton County, Washington
At This Site Since: 1960 **NAICS#:** 56221, 924110, 54171
Current Site Status: Landfill /Closing Unit Group #26

Ecology

Lead Contact: Nancy Ware
Phone: (509) 372-7912 **FAX:** (509) 372-7971
Other Representatives: N/A
Report Date: July 20, 2015
Index: #15.534
Report By: Nancy Ware



(Signed)

7/20/2015

(Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource Conservation and Recovery Act of 1976, as amended, (RCRA) facility even though the Hanford Site contains numerous processing areas spread over a large geographic area. The Hanford Site is a tract of land approximately 586 square miles and is located in Benton County, Washington. This site is divided into distinct Dangerous Waste Management Units (DWMUs) which are administratively organized into "unit groups." A unit group may contain only one DWMU or many; currently, there are 37 unit groups at the Hanford Site. Individual DWMUs utilize only a very small portion of the Hanford Site. Additional descriptive information on the individual DWMUs is contained in unit group permit applications and in Parts III, V, and VI of the Hanford Facility RCRA Permit, Dangerous Waste Portion, WA7890008967, Revision 8C (hereafter referred to as the Permit).

Facility Background

The Low-Level Burial Grounds went operational in 1960 and accepted solid non-radioactive dangerous waste (DW), such as rags, paint, tools, lubricants, spent equipment, and broken parts, from various Hanford process activities. The LLBG-GI portions are no longer operational dangerous waste units. Tri-Party Agreement milestone M-015-93B requires a closure plan, and the schedule for closure is due after the closure plan is submitted. The dates for this milestone

are currently in negotiation. The cleanup will meet Comprehensive Environmental Response, Compensation and Liability Act of 1980 and RCRA Corrective Action requirements.

Inspection Summary

This inspection was an announced non-financial record review, which was performed as part of the complete annual inspection of the Hanford Site by the Department of Ecology, Nuclear Waste Program. The purpose of this inspection was to determine compliance with the Interim Status Standards for treatment, storage and disposal (TSD) Facilities under 40 Code of Federal Regulations 265, incorporated by reference and updated by Washington Administrative Code (WAC) Chapter 173-303-400, as well as other applicable sections of WAC 173-303. The scope of the inspection was limited to an evaluation of the facility's DW inspection schedule for this unit and associated inspection records in accordance with WAC 173-303-320 requirements. No onsite inspection was performed.

Mr. Williams provided the LLBG-GI inspection schedule and inspection records for the months of April 2014 and March 2015 for each of the LLBG-GI. SW-040-041, SWSD-PRO-OP-51713, Revision 9, Change 3, *Inspect Low-Level Burial Grounds*, includes the inspection schedule for LLBG-GI and sets the schedule for performing weekly inspections. I reviewed the inspection schedule document and observed no problems. The weekly inspections are documented on Appendix A - Weekly LLBG Non-RCRA Inspection Checklist.

WAC 173-303-320(2)(d) states, *The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken.*

The inspection record for 218-W-4C, dated 4/22/2014, has two comments to fix items: 1) *fix fence on the east and west sides*; and 2) *fix signs on the west side*. Both of these items could relate to WAC 173-303 requirements. However, no detail is provided to determine what needs to be fixed. The record also, does not state when the problem was resolved, and how it was resolved, but it is not mentioned again on the next week's record as still being a problem.

The inspection record for 218-W-4B, dated 4/16/14, has the following item marked as "No," with a circled 2: *Backfilled storage/disposal trenches/areas are free of depressions, cave-ins, subsidence, cracks, signs of animal intrusion, or erosion*. Problems with depressions, cave-ins, subsidence, cracks, signs of animal intrusion, and erosion are all potential non-compliances with the WAC 173-303 requirements. However, the circled 2 comment does not indicate the specific problem found in relationship to depressions, cave-ins, subsidence, cracks, signs of animal intrusion, and erosion. Circled item 2 states, *white tarp covering waste is starting to show on Mod 7 trench 7 south west corner*. The record also does not state when the problem was resolved or how it was resolved, but it is not mentioned again on the next week's record as still being a problem.

Concern:

1. The inspection record for 218-W-4C, dated 4/22/2014, has two comments to fix items: 1) *fix fence on the east and west sides*; and 2) *fix signs on the west side*. Both of these items could relate to WAC 173-303 requirements. However, no detail is provided to determine what needs to be fixed. The inspection record for 218-W-4B, dated 4/16/14, has the following item marked as "No," with a circled 2: *Backfilled storage/disposal trenches/areas are free of depressions, cave-ins, subsidence, cracks, signs of animal intrusion, or erosion*. Problems with depressions, cave-ins, subsidence, cracks, signs of animal intrusion, and erosion are all potential non-compliances with the WAC 173-303 requirements. However, the circled 2 comment does not indicate the specific problem found in relationship to depressions, cave-ins, subsidence, cracks, signs of animal intrusion, and erosion. Circled item 2 states; *white tarp covering waste is starting to show on Mod 7 trench 7 south west corner*. Both records do not state when the problem was resolved or how the problem was resolved. However, the problem is not mentioned again on the next week's record as still being a problem.

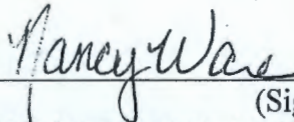
More detail should be provided to document the specific problems found. When the items relate to compliance with WAC 173-303 requirements, the resolution of the problem and the date of the resolution must also be listed on the inspection record.

**Washington Department of Ecology
Nuclear Waste Program
Compliance Report**

Site: NON-RADIOACTIVE DANGEROUS WASTE
LANDFILL (NRDWL)
RCRA Site ID: WA7890008967
Inspection Date: June 22, 2015
Site Contacts: Joel Williams, Regulatory Inspection Lead,
CH2MHILL Plateau Remediation Company (CHPRC)
Phone: (509) 376-4782 **FAX:** N/A
Site Location: 600 Area, Hanford Site
Benton County, Washington
At This Site Since: 1973 **NAICS#:** 56221, 924110, 54171
Current Site Status: Landfill /Closing Unit Group #20

Ecology

Lead Contact: Nancy Ware
Phone: (509) 372-7912 **FAX:** (509) 372-7971
Other Representatives: N/A
Report Date: July 20, 2015
Index: #15.535
Report By: Nancy Ware



(Signed)

7/20/2015

(Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource Conservation and Recovery Act of 1976, as amended, (RCRA) facility even though the Hanford Site contains numerous processing areas spread over a large geographic area. The Hanford Site is a tract of land approximately 586 square miles and is located in Benton County, Washington. This site is divided into distinct Dangerous Waste Management Units (DWMUs) which are administratively organized into "unit groups." A unit group may contain only one DWMU or many; currently, there are 37 unit groups at the Hanford Site. Individual DWMUs utilize only a very small portion of the Hanford Site. Additional descriptive information on the individual DWMUs is contained in unit group permit applications and in Parts III, V, and VI of the Hanford Facility RCRA Permit, Dangerous Waste Portion, WA7890008967, Revision 8C (hereafter referred to as the Permit).

Facility Background

From 1973 to 1975 the NRDWL and the Solid Waste Landfill operated as one unit. In 1975 the two units were split into two individual units, and the NRDWL continued to operate from January 1975 through May 1985. Asbestos waste continued to be received at NRDWL through 1988.

The NRDWL is a 10-acre landfill located in the 600 area ~4 miles southeast of the 200 East Area. The landfill is made up of 19 unlined trenches which are ~400 feet long, 16 feet wide, and

15 feet deep. Of the 19 trenches, six trenches (19N, 26, 28, 31, 33, and 34) were used for dangerous waste (DW) disposal. The NRDWL accepted non-radioactive DW generated from operations, laboratories, maintenance activities, and transportation functions on the Hanford Site.

Inspection Summary

This inspection was an announced non-financial record review, which was performed as part of the annual compliance evaluation inspection for the Hanford Site by the Ecology Nuclear Waste Program (NWP). The purpose of this inspection was to determine compliance with the Interim Status TSD requirements under 40 CFR 265, incorporated by reference and updated by Washington Administrative Code (WAC) Chapter 173-303-400, as well as other applicable sections of WAC 173-303. The scope of the inspection was limited to an evaluation of the facility's dangerous waste (DW) inspection schedule for this unit and associated inspection records compared to the WAC 173-303-320 requirements. No site inspection was performed.

Mr. Williams provided the NRDWL inspection schedule and inspection records dating from January 2014 through April 2015. 2CP-SUR-R-03001, CPSM-PRO-OP-52153, Revision 2, Change 8, *Quarterly TSD's Waste Site Surveillance*, includes the inspection schedule for NRDWL and sets the schedule for performing DW inspections as quarterly. I reviewed the inspection schedule document and observed no problems. I also reviewed the inspection records for the last six quarters. The inspections are documented on Appendix A, Data Sheet 1 - Non-Radioactive Dangerous Waste Landfill (TSD# D-6-1). I observed that the inspection records dated 1/6/2014, 4/2/2014, 7/8/2014, 10/6/2014, and 1/6/2015 did not include the time of the inspection.

WAC 173-303-320(2)(d) states, *The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken.*

The inspection record dated 4/22/2015 reflects that Appendix A, Data Sheet 1 - Non-Radioactive Dangerous Waste Landfill (TSD# D-6-1) included the time of inspection. The Appendix A, Data Sheet had been updated to include a field next to the date field to add the time the inspection was performed.

Compliance Problems

The DW inspection on June 22, 2015 found the following compliance problems.

Each problem is covered in three parts:

- (1) **Citation from the regulations.**
- (2) **Specific observations** from the inspection that highlight the problem.
- (3) **Required actions** needed to fix the problem and achieve compliance.

The last pages of this report are a 'Compliance Certificate' listing the violations and the actions required to gain compliance. This certificate must be returned to Ecology within 60 days of receipt. The certificate explains how to complete the form and return it to the Department of Ecology.

This does not relieve you of your continuing responsibility to comply with the regulations at all times.

- 1) **WAC 173-303-320(2). The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. In addition: (d) The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken. The log or summary must be kept at the facility for at least five years from the date of inspection.**

Observation: The inspection records dated 1/6/2014, 4/2/2014, 7/8/2014, 10/6/2014, and 1/6/2015 did not include the time of the inspection.

Action Required: The inspection record dated 4/22/2015 reflects that the inspection record template was updated to include the time of inspection. The facility must document in their operating record that the inspection records listed above did not include the time of the inspection. Submit verification for the documentation placed into the operating record to Ecology within sixty (60) days of receipt of this inspection report.

COMPLIANCE CERTIFICATE

Return this Completed Form within 60 days of receipt or Request an Extension

Use this form to report if the action(s) required to achieve compliance that were identified during the inspection on June 22, 2015 have been completed.

Complete the shaded portions and mail a copy of this form to Nancy Ware within 60 days at the following address: Washington Department of Ecology, Nuclear Waste Program, Attention: Nancy Ware, 3100 Port of Benton Boulevard, Richland, Washington 99352.

You may request an extension of the deadlines to achieve compliance. Make the request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to Nancy Ware within 60 days. Ecology will provide a written approval or denial of your request.

**If you have any questions about information in this Compliance Report, please call:
Nancy Ware at (509)372-7912**

The problems listed below must be corrected to comply with Washington DW Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Note the date each action is completed and initial each item. Include required documentation, and make any other comments explaining the actions taken on a separate piece of paper.

- 1) WAC 173-303-320(2). The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. In addition: (d) The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken. The log or summary must be kept at the facility for at least five years from the date of inspection.**

Compliance Item	Date Completed	Initials
The facility must document in their operating record that the inspection records listed above did not include		

the time of the inspection. Submit verification for the documentation placed into the operating record to Ecology within sixty (60) days of receipt of this inspection report.		
--	--	--

The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, sex, marital status, disabled veteran's status, Vietnam Era veteran's status, or sexual orientation. If you have special accommodation needs or require this document in alternative format, please contact Nancy Ware at (509) 372-7912 (Voice) or use the Washington State Relay operator by dialing either 711 or 1-800-833-6388 (TTY).