



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 5, 2021

21-NWP-035

Brian T. Vance, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-30
Richland, Washington 99352

Scott Sax, President and Project Manager
Central Plateau Cleanup Company LLC
PO Box 1464, MSIN: A7-01
Richland, Washington 99352

Re: Dangerous Waste Compliance Inspection on November 19, 2020, at 400 Area Dangerous Waste Management Units, RCRA Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No.: 20.719

Dear Brian T. Vance and Scott Sax:

Thank you for your staff's time during the 400 Area Dangerous Waste Management Units inspection on November 19, 2020. The Department of Ecology's (Ecology) compliance report of this inspection is enclosed. The report cites one area of non-compliance and no concerns.

To return to compliance, complete the actions required in the compliance problems section of the report and respond to Ecology within the timeframes specified. Include all supporting documentation in your response, (such as photographs, records, and statements explaining the actions taken and dates completed). Submit this information to Phillip Buser 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.

Specific deficiencies or violations not listed in the enclosed compliance report do not relieve your facility from having to comply with all applicable regulations.

Brian T. Vance and Scott Sax
March 5, 2021
Page 2 of 2

21-NWP-035
400 Area Dangerous Waste Management Units
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 20.719
Inspection Date: November 19, 2020

If you have questions or need further information, please contact me at (509) 316-6323 or phillip.buser@ecy.wa.gov.

Sincerely,



Digitally signed by Buser,
Phillip (ECY)
Date: 2021.03.05 07:56:16
-08'00'

Phillip Buser
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tla
Enclosure

cc electronic w/enc:

Dave Bartus, EPA
Dave Einan, EPA
Cheryl Williams, EPA
Ben Harp, USDOE-ORP
Duane Carter, USDOE-RL
Tony McKarns, USDOE-RL
Allison Wright, USDOE-RL
Bob Cathel, CPCCo
Danielle Collins, CPCCo
Jennifer Copeland, CPCCo
Linda Petersen, CPCCo
Ken Reynolds, CPCCo
Jennifer Williams, CPCCo
Jon Perry, HMIS
Steve Szendre, HMIS
ERWM Staff, YN
Susan Leckband, HAB
Jeff Burrignt, ODOE
Max Woods, ODOE
Shawna Berven, WDOH
John Martell, WDOH
Deb Alexander, Ecology
David Bowen, Ecology
Phillip Buser, Ecology
Kathy Conaway, Ecology

Joseph Lippold, Ecology
Jared Mathey, Ecology
John Price, Ecology
Jonathan Rogers, Ecology, NWP
Compliance Index File: 20.719
Stephanie Schleif, Ecology
Adam Shaffer, Ecology
John Temple, Ecology
Environmental Portal
Hanford Facility Operating Record
TPA Administrative Record
CPCCo Correspondence Control
EPA Region 10 Hanford Field Office
Correspondence Control
HMIS Correspondence Control
USDOE-ORP Correspondence
Control
USDOE-RL Correspondence Control

cc w/o enc:

Mason Murphy, CTUIR
Jack Bell, NPT
Laurene Contreras, YN

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

Site: 400 Area Dangerous Waste Management Units
RCRA Site ID: WA7890008967
Inspection Date: November 19, 2020
Site Contacts: Linda Petersen, CH2M Hill Plateau Remediation Company (CHPRC)
Allison Wright, United States Department of Energy – Richland Operation Office (USDOE-RL)
Site Location: Hanford Site, 400 Area
At This Site Since: 1943 **NAICS#:** 56221, 924110, and 54171
Current Site Status: Treatment Storage and Disposal Facility/Large Quantity Generator

Ecology

Lead Contact: Phillip Buser **Phone:** (509) 316-6323

Other Representatives: Adam Shaffer, Support Inspector

Report Date: March 5, 2021

Index #: 20.719

Report By:



Digitally signed by Buser,
Phillip (ECY)
Date: 2021.03.05 07:55:04
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(Signed)

(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* (RCRA), as amended, 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 580 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 30 unit groups at the Hanford Site. Individual DWMUs make up a 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).

Owner and Operator Information

The United States Department of Energy (USDOE) is the owner and operator of the 400 Area Waste Management Unit (WMU) and oversees waste management and cleanup activities ongoing at the Hanford Site. CHPRC is contracted by the USDOE to co-operate the 400 Area WMU.

Facility Background

The 400 Area WMU is in Hanford's 400 Area near the Fast Flux Test Facility (FFTF). The 400 Area WMU manages waste from the decommissioning and demolition of the FFTF.

The FFTF is a formerly operating 400-megawatt (thermal) liquid-metal (sodium) cooled research and test reactor owned by USDOE. Advanced fuels/material for the Liquid Metal Fast Breeder Reactor Program were developed and tested at FFTF. It served as a prototype for future liquid metal fast breeder reactor facilities.

The FFTF was built in the late 1970s and operated from 1982 to 1992. Shutdown (deactivation) of FFTF began in 1993 and was completed in 2009. The facility was placed in surveillance and maintenance until its final decommissioning end state is decided. Alternatives for the FFTF final decommissioning end state are being analyzed in the *Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site, Richland, Washington* (TC&WM EIS) (DOE/EIS-15 0391).

The 400 Area WMU consists of the Fuel Storage Facility (FSF) and Interim Storage Area (ISA).

- The FSF is in a large, high-bay building (Building 403) next to FFTF.
- The ISA is a fenced outdoor pad just north of FFTF.

Type and Quantity of Waste: the 400 Area WMU only stores containerized mixed waste (MW) from the 400 Area. The MW includes:

- Elemental sodium.
- Sodium hydroxide.
- Sodium/potassium eutectic (NaK).
- Debris contaminated with elemental sodium, sodium hydroxide, and NaK.

The MW waste codes are D001, D002, D003, WSC2, they include ignitable, corrosive, and/or reactive waste codes. The storage capacity of the FSF is about 1,000 gallons and the storage capacity of the ISA is about 19,000 gallons.

Compliance Background

For information regarding the compliance history of the 400 Area DWMU prior to 2017, refer to Ecology compliance reports Index Number 17.598. Summaries of Compliance Inspection Index numbers 18.652 and 19.684 are below:

Inspection 18.652 – September, 27, 2018

This inspection cited the following violations:

- Permit Condition III.16.H.1 – Permittees did not follow procedures for the Annual Ignitable/Reactive Waste fire Inspection form.
- Washington Administrative Code (WAC) 173-303-070 – Permittee did not designate dangerous waste found in a pail of sodium in the Interim Examination and Maintenance (IEM) Cell.

Inspection 19.684 – October 1, 2019

EPA conducted a Compliance Evaluation Inspection (CEI) Inspection. No areas of non-compliance were found.

Inspection Summary

On November 19, 2020, Adam Shaffer and I arrived at the 400 Area at 11:00 am. We were joined by:

- Bob Cathel – Environmental Project Manager, CHPRC.
- Jennifer Copeland – Inspection Coordinator, CHPRC.
- Andy Klosky – Radiological Compliance Technician (RCT), CHPRC.
- Scott Snook – Nuclear Compliance Officer, CHPRC.
- Linda Petersen – Inspection Coordinator, CHPRC.
- Ken Reynolds – Operations Manager, CHPRC.

I began the inspection by reviewing Ecology's current field inspection protocols including number of people allowed. As there were more than five people present, we discussed who was included in the five person inspection team. It was determined that Mr. Cathel, Ms. Copeland and Ms. Petersen would join Mr. Shaffer and I. Mr. Klosky and Mr. Reynolds would oversee our inspection near the Radiological Area (RA), then be available for questions from a safe distance for the remainder of the inspection. I said I would like to look at the ISA Pad, and the exterior argon gas lines. Mr. Klosky provided us with a safety briefing. He described the RA nearby, and explained we cannot pass the boundary. Mr. Cathel added that there is a spill kit located nearby, we need to follow the directions of the RCT, everyone needs safety glasses, everyone needs to watch where they walk, and we would stage at Building 4707 if an event occurred.

We began the walk-through at the ISA Pad which has a conex box. Mr. Klosky and Mr. Snook opened the gate. I observed the gate had an operable padlock. I observed the following signs:

- Caution – Radiological Control Area.
- Danger Hazardous Waste Storage Area.
- Danger Unauthorized Personnel Keep Out.
- Attention: All personnel entering the ISA required to know the spill/emergency kit located at the north end of Building 4710.
- 200 Area Surveillance and Maintenance Facility – Do Not Enter Without Authorization.

I observed a conex storage box labeled FFTF-001. On the outside of the conex, I observed a National Fire Protection Association (NFPA) label diamond with the following hazard severity designations: Flammability = 3, Health = 3, Instability = 2, Special Information = Reacts with water. I observed a Radioactive placard and three signs with the following:

- Danger Unauthorized Personnel Keep Out.
- Danger Hazardous Waste Storage Area.
- Danger No Smoking, Matches or Open Flames.
- No Storage or Cask Placement within 20 Feet.

Mr. Klosky and Mr. Snook opened the doors of the conex box. Standing behind the RA boundary, Mr. Shaffer and I observed 19 containers – six overpacks, five 55-gallon drums, one 40-gallon drum, two 8-gallon buckets, four 5-gallon buckets, and one tall cylinder of unknown capacity. Mr. Shaffer stated that we were unable to see the hazardous waste labels on two of the containers. Mr. Snook and Mr. Klosky joined us, entered the RA and re-positioned the two containers so we could identify the labels. Mr. Shaffer asked what was in the nearby cask. Mr. Snook stated it was empty.

I observed two vents on the south-facing wall of the conex box, and two more on the north-facing wall. I observed one brownish, dirtied absorbant pad taped to the inside (south-facing) wall underneath the upper vent and two discolored absorbant pads taped to the floor directly underneath the upper vent. On the exterior of the upper vent of the south-facing wall, I observed torn tape around the edges. I did not observe any tape or absorbant pads around the other vents. From the distance behind the RA boundary, I was not able to identify the condition of the seal for the doors to the conex building.

In accordance with the Hanford Dangerous Waste Permit 8C, Part III, 400 Area Waste Management Unit, Addendum J, a portable Class D fire extinguisher is required at the ISA Pad inside the locked fence near the gate. I observed a box labeled Fire Extinguisher by the gate. I observed a functional door that revealed a Class D fire extinguisher with a hose and spray nozzle. I also observed the inspection label was current through November 2020.

I mentioned that according to the sign, a spill kit is located at the north end of Building 4710. I asked if we could see this. We proceeded due south to the nearest building, which was Building 4710. I observed a metal box labeled Emergency Response Spill Kit with a tape seal.

I asked to see the entrance to Building 403. We walked over to Door 9110 and I observed the following signs:

- 200 Area Surveillance and Maintenance Facility. Do Not Enter Without Authorization.
- Danger No Smoking, Matches or Open Flames.
- Danger Hazardous Waste Storage Area.
- Danger Unauthorized Personnel Keep Out.
- Attention: All personnel entering the FSF required to know spill/emergency kit located at the north end of Building 4710.

I asked if we could see the exterior argon gas lines leading to the FSF. We walked around the NW corner to the backside of the building. Mr. Snook joined us to identify the argon system. He identified three tanks and an evaporator used to supply argon inside the facility. Mr. Snook said they are working through the process of changing from liquid argon to compressed argon. I observed two main valves with locks on the argon lines, and several small secondary valves. I did not observe any pressure gauges outside.

I stated this completed the walk-through of my inspection and I had some additional questions. I said if Mr. Cathel or Mr. Snook could not answer my questions at this time, I would include them in a document request at a later date. I asked if there has been any changes to the waste inventory of the 400 Area WMU in calendar year 2020. Mr. Cathel said no. I asked if there had been a spill occurrence at the 400 Area WMU in the past year. Mr. Cathel said no. I asked how remedial actions for the 400 Area WMU are tracked. Mr. Cathel said they are documented and tracked on an inspection log. I asked if there has been any changes to facility processes since the last inspection. Mr. Cathel said no. He added that no waste has moved in or out of the facility. I asked if anyone knew the current status of the treatability study coordinated with PermaFix Northwest for the geomelt process. Neither Mr. Cathel nor Mr. Snook could answer. I said that Ecology Compliance Inspection 18.652 had a concern regarding the Hanford Fire Department's inability to access the facility during a fire alarm. I asked if this had been remedied. Mr. Cathel said the gates have Fire Department locks. I said the Building Emergency Plan has a section that addresses ash fall. I asked if the recent poor air quality due to high smoke particulate would have triggered any emergency plan response. Mr. Snook said the air quality during the smoke was evaluated, but not high enough to implement any changes.

We concluded the inspection. We departed at 12:30 pm.

Records Review

I requested all **weekly** dangerous waste inspections of the FSF and ISA container storage areas for July 2020 in accordance with Hanford Dangerous Waste Permit 8C, Part III, 400 Area Waste Management Unit, Addendum I. I received records documented on 2CP-SUR-F-05024, Revision 2, Change 5, Hanford Facility RCRA Permit 400 Area Waste Management Unit Inspections, Appendix A – *Inspection Log for 400 FSF (Building 403)* and Appendix B – *Inspection Log for ISA Pad*.

I observed weekly inspections occurred on July 6, 13, 22, and 27, 2020. Log sheets addressed major risk labels on containers, if containers were open or closed, container integrity, presence of danger signs, evidence of spills, facility conditions and monthly inspection cards completed. I observed that each inspection record contained the printed name and handwritten signature of the inspector, the date and time of the inspection, and notations of the observations made. I did not observe any deficiencies noted on any of the inspection records I reviewed.

I requested the monthly portable emergency response kit and spill kit inspection records for the months of July 2020 and September 2020. I received two records documented on SM-20482, Emergency Equipment Inspections, Appendix A – *Emergency Equipment Monthly Inspection Checklist*. They were dated July 13, 2020 and September 3, 2020. I observed WMU 4710 (FFTF) listed under Emergency Response/Spill Kit. The spill kit was marked satisfactory for clear access and complete inventory for both months. I observed that each inspection record contained the printed name and handwritten signature of the inspector, the date and time of the inspection, and notations of the observations made. I did not observe any deficiencies noted on any of the inspection records I reviewed.

I requested the most recent annual ignitable and reactive waste inspection record. I received two copies of an Ignitable/Reactive Waste Fire Inspection Owner or Operator sheet, one for Building 403 and one for the ISA Pad. I observed a facility description and a checklist for the following:

- Materials separated from sources of ignition.
- “No Smoking” signs posted.
- Free from combustibles.
- A 20-foot wide Fire Department response road is within 150 feet.
- Portable fire extinguisher present.
- Appropriate separation between incompatible wastes.
- Emergency communications available.
- Reactive/Ignitable chemicals/substances in allowable quantities.

I observed that each inspection record contained the printed name and handwritten signature of the inspector, the date and time of the inspection, and notations of the observations made. I did not observe any deficiencies noted on any of the inspection records I reviewed.

I requested full training records that demonstrate completion of all applicable dangerous waste training courses identified in the *400 Area Waste Management Unit Dangerous Waste Training Plan*, taken between January 1, 2019 to December 17, 2020 for the Nuclear Chemical Operators, Field Work Supervisors and any other approving managers for all the weekly inspections that occurred in July 2020. I requested the position title for each person be provided. I received a Training Activity Sheet for Course 000019, Hanford General Employee Training (HGET) Refresher. I observed that Course 000001, Hanford General Employee Training (HGET) Initial was identified as both a Training Equivalent course and a Prerequisite course. I also observed that the retraining frequency was listed as 16 months. I received training records for the following personnel:

- Anthony Hoffman – Nuclear Chemical Operator.
- Ben Hovley – Nuclear Chemical Operator.
- Brian Cordray – Field Work Supervisor.
- Dale Harder – Nuclear Chemical Operator.
- Justin Roberts – Building Emergency Director (BED) & Field Work Supervisor.
- Robert Korhuniak – Nuclear Chemical Operator.
- Roy Plunkett – BED & Field Work Supervisor.
- Ryan Fisher – Environmental Chemical Operator.

In accordance with PRC-STD-TQ-40236, *Central Plateau Risk Management Dangerous Waste Training Plan*, Revision 2, Change 2, dated December 11, 2019, I observed the following training requirements for the specified positions:

Building Emergency Director (BED)

Course Number	Course Title	Frequency	Training Type
000001	Hanford General Employee Training	Annual	General Hanford Facility Training/Contingency Plan Training
290200	Central Plateau Risk Management (CPRM) Orientation	Annual	General Hanford Facility Training/Contingency Plan Training
02028B	Building Emergency Director Initial Training	Initial	Emergency Coordinator Training
037515	Building Emergency Director Refresher Training	Annual	Emergency Coordinator Training
304451	CPRM Building Emergency Director Qualification Card Checklist	Initial	Emergency Coordinator Training

Environmental Compliance Officer (ECO)

Course Number	Course Title	Frequency	Training Type
000001	Hanford General Employee Training	Annual	General Hanford Facility Training/Contingency Plan Training
290200	CPRM Orientation	Annual	General Hanford Facility Training/Contingency Plan Training
600100	Environmental Compliance Officer Core (On-the-Job Training)	Initial	Operations Training

Field Work Supervisor (FWS)

Course Number	Course Title	Frequency	Training Type
000001	Hanford General Employee Training	Annual	General Hanford Facility Training/Contingency Plan Training
290200	CPRM Orientation	Annual	General Hanford Facility Training/Contingency Plan Training
02006G*	Waste Management Awareness (Classroom)	Initial	Operations Training

Field Work Supervisor (FWS)

Course Number	Course Title	Frequency	Training Type
035100*	Container Management Initial (Classroom)	Initial	Operations Training
035110	Container Management Refresher (Computer Based Training)	Annual	Operations Training

*FWS may take course 02006G or 035100. Course 02006G does not require periodic refresher training.

Nuclear Chemical Operator (NCO)

Course Number	Course Title	Frequency	Training Type
000001	Hanford General Employee Training	Annual	General Hanford Facility Training/Contingency Plan Training
290200	CPRM Orientation	Annual	General Hanford Facility Training/Contingency Plan Training
035100	Container Management Initial (Classroom)	Initial	Operations Training
035110	Container Management Refresher (Computer Based Training)	Annual	Operations Training
290004	CPRM NCO Waste Handler Qualification	Every 2 Years	Operations Training

I reviewed the training records for each person and observed the following training courses and completion dates.

Building Emergency Director

Roy Plunkett

- Annual Course 000001 taken on November 24, 2020.
- Refresher Course 000019 taken on November 24, 2020.
- Annual Course 290200 taken on November 18, 2020.
- Initial Course 02028B taken on June 28, 2017.
- Annual Course 037515 taken on April 2, 2020.
- Initial Course 304451 taken on September 5, 2017.

Justin Roberts

- Annual Course 000001 taken on September 26, 2016.
- Refresher Course 000019 taken on November 16, 2020.
- Annual Course 290200 taken on November 17, 2020.
- Initial Course 02028B taken on January 12, 2016.
- Annual Course 037515 taken on September 14, 2020.
- Initial Course 304451 taken on June 6, 2018.

Environmental Compliance Officer

Ryan Fisher

- Annual Course 000001 taken on August 5, 2019.
- Refresher Course 000019 taken on November 11, 2020.
- Annual Course 290200 taken on October 28, 2020.
- Course 600100 taken on February 6, 2020.

Field Work Supervisors

Brian Cordray

- Annual Course 000001 taken on July 18, 2016.
- Refresher Course 000019 taken on October 20, 2020.
- Initial Course 02006G taken on June 13, 2001.
- Annual Course 290200 taken on March 18, 2020.
- Initial Course 035100 not completed.
- Annual Course 035110 not completed.

Roy Plunkett

- Annual Course 000001 taken on November 24, 2020.
- Refresher Course 000019 taken on November 24, 2020.
- Initial Course 02006G taken on September 18, 1997.
- Annual Course 290200 taken on November 18, 2020.
- Initial Course 035100 not taken.
- Annual Course 035110 not taken.

Justin Roberts

- Annual Course 000001 taken on September 26, 2016.
- Refresher Course 000019 taken on November 16, 2020.
- Initial Course 02006G taken on October 27, 2009.
- Annual Course 290200 taken on November 17, 2020.
- Initial Course 035100 not completed.

- Annual Course 035110 not completed.

Nuclear Chemical Operator

Dale Harder

- Annual Course 000001 taken on December 6, 2016.
- Refresher Course 000019 taken on December 3, 2020.
- Annual Course 290200 taken on March 19, 2020.
- Initial Course 035100 taken on May 14, 1998.
- Annual Course 035110 taken on October 22, 2020.
- Bi-Annual Course 290004 taken on December 13, 2018.

Anthony Hoffman

- Annual Course 000001 taken on November 14, 2016.
- Refresher Course 000019 taken on October 27, 2020.
- Annual Course 290200 taken on November 23, 2020.
- Initial Course 035100 taken on August 27, 2003.
- Annual Course 035110 taken on October 8, 2020.
- Bi-Annual Course 290004 taken on November 13, 2019.

Ben Hovley

- Annual Course 000001 taken on June 27, 2016.
- Refresher Course 000019 taken on October 17, 2019.
- Annual Course 290200 taken on December 9, 2020.
- Initial Course 035100 taken on March 21, 1996.
- Annual Course 035110 taken on December 9, 2020.
- Bi-Annual Course 290004 not completed.

Robert Korhuniak

- Annual Course 000001 taken on October 27, 2016.
- Refresher Course 000019 taken on February 11, 2020.
- Annual Course 290200 taken on November 30, 2020.
- Initial Course 035100 taken on March 5, 2018.
- Annual Course 035110 taken on February 11, 2020.
- Bi-Annual Course 290004 taken on January 4, 2021.

I asked for the currently anticipated start date of closure of the 400 Area ISA and FSF. I received the following response:

“Closure dates for the ISA and FSF have not been established. The earliest anticipated date for closure is around 2043.”

I asked for the current status of the treatability study being coordinated with PermaFix Northwest for the Geomelt process. I received the following response:

“Even though a RCRA Treatability Study is not a permit required study, it appears as though PermaFix Northwest will not proceed with the study without Ecology approval.”

I asked for the current schedule for converting the inert gas (argon) system from using liquid argon to compressed argon. I received the following response:

“Assuming the permit would be approved, the new argon system is scheduled to be operational in November 2021.”

<p>Note: Hanford Dangerous Waste Permit 8C, Part III, 400 Area Waste Mangement Unit, Addendum F, Section F.2.2 states, “The 400 Area storm water drainage system and appropriate grading prevent run-off.”</p>

I asked for an explanation as to where storm water goes when it leaves the site. I was provided the following response:

“The grading at the 400 Area is such that storm water is collected just to the north and south of the 400 Area. Storm water collected in the north area is conveyed through piping to percolation ponds approximately 400 meters north of the 400 Area. Storm water collected in the south area is conveyed by corrugated piping and open trenches and is allowed to percolate into the ground near Route 40.”

Compliance Problems

The Dangerous Waste inspection on November 19, 2020, 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 problems listed below must be corrected to comply with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Complete the required actions listed below and respond to Ecology at the following address within the times specified below. Include all supporting documentation such as photographs, records, and statements explaining the actions taken and dates completed to return to compliance.

Attention: Phillip Buser
Washington Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd
Richland, WA 99354

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 Phillip Buser before the date specified above. Ecology will provide a written approval or denial of your request.

**If you have any questions about information in this Compliance Report, please call:
Phillip Buser at (509) 316-6323**

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

- 1) **WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.**

WAC 173-303-330(1) *Training program.* The facility owner or operator must provide a program of classroom instruction or on-the-job training for facility personnel. This program must teach personnel to perform their duties in a way that ensures the facility's compliance with this chapter 173-303 WAC, must teach facility personnel dangerous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed, must ensure that facility personnel are able to respond effectively to emergencies, and must include those elements set forth in the training plan required in subsection (2) of this section. In addition:

(c) This program must be successfully completed by the facility personnel:

(i) Within six months after these regulations become effective; or

(ii) Within six months after their employment at or assignment to the facility, or to a new position at the facility, whichever is later.

(d) Employees hired after the effective date of these regulations must be supervised until they complete the training program; and

AND

WAC 173-303-200(9) *Personnel training.* (a) **Training program.** The generator must provide a program of classroom instruction or on-the-job training for facility personnel. This program must teach personnel to perform their duties in a way that ensures the facility's compliance with this chapter, must teach facility personnel dangerous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed, must ensure that facility personnel are able to respond effectively to emergencies, and must include those elements set forth in the training plan required in (b) of this subsection. In addition:

(iii) This program must be successfully completed by the facility personnel:

(A) Within six months after these regulations become effective; or

(B) Within six months after their employment at or assignment to the facility, or to a new position at the facility, whichever is later.

(iv) Employees hired after the effective date of these regulations must be supervised until they complete the training program;

Observations: I reviewed the training courses completed by facility personnel and compared them to the requirements of PRC-STD-TQ-40236, *Central Plateau Risk Management Dangerous Waste Training Plan*, Revision 2, Change 2, dated December 11, 2019.

I observed that Ben Hovley, NCO, had not completed Course 290004, CPRM NCO Waste Handler Qualification. This course has a re-train frequency of two years. I observed the earliest listed training record of Mr. Hovley of October 2, 1990 for Course 000001, HGET.

Action Required: Within 60 days of receipt of this compliance report, USDOE and CHPRC must do the following:

- Have Nuclear Chemical Operator Ben Hovley take Course 290004, CPRM NCO Waste Handler Qualification as soon as possible and biennially thereafter.
- Have Nuclear Chemical Operator Ben Hovley be supervised while conducting Nuclear Chemical Operator work until completing the training program.

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at (509) 372-7950 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at (877) 833-6341.