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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 22, 2018

18-NWP-140

By certified mail

Mr. Doug S. Shoop, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-20
Richland, Washington 99352

Mr. Ty Blackford, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: A7-01
Richland, Washington 99352

Re: Department of Ecology (Ecology) Review of Responses to Dangerous Waste Compliance Inspections, RCRA Site ID: WA7890008967, NWP Compliance Index Nos. 17.588, 17.590, 17.599, 17.605, 17.606, 17.607, 17.608, 17.609, 17.610, 17.611, 17.612, and 17.621

Reference: Letter 18-ESQ-0071, received on June 28, 2018, "Transmittal of Updated Dangerous Waste Training Plans"

Dear Mr. Shoop and Mr. Blackford:

Ecology has reviewed your response letter and enclosures, received on June 26, 2018, (reference) and modified Central Plateau Project Surveillance and Maintenance Dangerous Waste Training Plan received on August 15, 2018. Your letter included corrective actions for items of non-compliance identified in Ecology's inspections of the Dangerous Waste Management Unit (DWMU) groups below.

- 17.588 – Central Waste Complex (CWC)- Inspected April 20, 2017
- 17.590 – Low Level Burial Grounds (LLBG) – Trenches 31 and 34 – Inspected May 2, 2017
- 17.599 – Waste Receiving and Packaging Facility (WRAP) – Inspected August 10, 2017
- 17.605 – Non-Radioactive Dangerous Waste Landfill (NRDWL) – Inspected August 22, 2017
- 17.606 – LLBG – Green Islands – Inspected August 22, 2017
- 17.607 – 216-B-3 Main Pond – Inspected August 24, 2017
- 17.608 – 216-S-10 Pond and Ditch – Inspected August 24, 2017
- 17.609 – 216-B-63 Trench – Inspected August 24, 2017
- 17.610 – 216-A-29 Ditch – Inspected August 24, 2017
- 17.611 – 216-A-36B Crib – Inspected August 24, 2017
- 17.612 – 216-A37-1 Crib – Inspected August 24, 2017
- 17.621 – Waste Encapsulation Storage Facility (WESF) – Inspected December 13, 2017

As of the dates listed below, the following areas of non-compliance from these DWMU groups have been addressed.

- 17.588 – CWC – June 26, 2018 – Area of Non-Compliance Three
- 17.590 – LLBG – Trenches 31 and 34 – June 26, 2018 – Area of Non-Compliance Two



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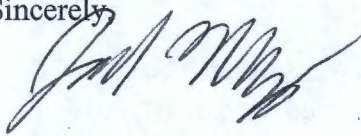
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Training Plan Areas of Non-Compliance Close-outs
RCRA Site ID: WA7890008967

- 17.599 – WRAP – June 26, 2018 – Area of Non-Compliance Four
- 17.605 – NRDWL – August 15, 2018 – Area of Non-Compliance Two
- 17.606 – LLBG – Green Islands – June 26, 2018 – Area of Non-Compliance Two
- 17.607 – 216-B-3 Main Pond – August 15, 2018 – Area of Non-Compliance Three
- 17.608 – 216-S-10 Pond and Ditch – August 15, 2018 – Area of Non-Compliance Three
- 17.609 – 216-B-63 Trench – August 15, 2018 – Area of Non-Compliance Three
- 17.610 – 216-A-29 Ditch – August 15, 2018 – Area of Non-Compliance Three
- 17.611 – 216-A-36B Crib – August 15, 2018 – Area of Non-Compliance Three
- 17.612 – 216-A37-1 Crib – August 15, 2018 – Area of Non-Compliance Three
- 17.621 – WESF – June 26, 2018 – Area of Non-Compliance One

In review of the modified Central Plateau Project Surveillance and Maintenance Dangerous Waste Training Plan submitted on August 15, 2018, I observed a footnote was added to the Nuclear Chemical Operator (NCO) position that stated, "Training for some NCOs to perform this duty." This newly added footnote makes the training requirements for the NCO position unenforceable, as there is no way to determine compliance for training of the NCO position, one of the root causes for many areas of non-compliance identified in the inspection reports listed above. To avoid future areas of training plan non-compliance, either remove this footnote or add a new position that performs these specific duties to the Dangerous Waste Training Plan.

If you have questions or need further information, please contact me at jared.mathey@ecy.wa.gov or (509) 372-7949.

Sincerely,



Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

mrb

cc: See page 3

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cc electronic:

Dave Bartus, EPA
Jack Boller, EPA
Dave Einan, EPA
Duane Carter, USDOE
Cliff Clark, USDOE
Michael Cline, USDOE
Al Farabee, USDOE
Doug Hildebrand, USDOE
Tony McKarns, USDOE
Julie Reddick, USDOE
Allison Wright, USDOE
Linda Petersen, CHPRC
Jon Perry, MSA
ERWM Staff, YN
Ken Niles, ODOE
Deb Alexander, Ecology

Danielle Collins, Ecology
Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
Jared Mathey, Ecology
Nina Menard, Ecology
John Price, Ecology
Ron Skinnarland, Ecology
Alex Smith, Ecology
Nancy Ware, Ecology
Cheryl Whalen, Ecology
Environmental Portal
Hanford Facility Operating Record
CHPRC Correspondence Control
MSA Correspondence Control
USDOE-RL Correspondence Control

cc: Matt Johnson, CTUIR
Jack Bell, NPT
Rose Longoria, YN
Susan Leckband, HAB

Administrative Record

NWP Central File

NWP Compliance Index Files: 17.588, 17.590, 17.599, 17.605, 17.606, 17.607, 17.608,
17.609, 17.610, 17.611, 17.612, and 17.621