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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 14, 2018

18-NWP-045

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 Inspection on April 20, 2017 at the Central Waste Complex, RCRA Site ID: WA7890008967, NWP Compliance Index No 17.588

Reference: Letter 18-ESQ-0030, received on February 7, 2018, "DANGEROUS WASTE COMPLIANCE INSPECTION ON APRIL 20, 2017, AT THE CENTRAL WASTE COMPLEX (CWC) RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE POLICY COMPLIANCE INDEX NO.: 17.588"

1248208

Dear Mr. Shoop and Mr. Blackford:

Ecology has reviewed your response letter and enclosures, received on February 7, 2018 (reference). Your letter included corrective action for an item of non-compliance identified in Ecology's April 20, 2017 inspection of the Central Waste Complex. As of February 7, 2018, area of non-compliance number two has been addressed. As noted in the December 6, 2017, compliance report, as of August 16, 2017, area of non-compliance number four was addressed.

Areas of non-compliance numbers one and three have not been adequately addressed.

Area of Non-Compliance One - WAC 173-303-630(3): In reviewing your response, containers identified in the compliance report were not labeled in a manner which adequately identifies the major risks associated with the contents of the containers for employees, emergency response personnel, and the public. Designation records identified dangerous waste codes from the toxicity characteristics list. A major risk of toxic was not identified on all containers cited, and your response did not indicate the containers are now labeled toxic. Additionally, regarding the identified obscured labels between containers, there was no response ensuring labels are not obscured or otherwise unreadable.

Area of Non-Compliance Three - WAC 173-303-330(2): In reviewing your response, a written training plan including documents and records with the job title, job description, and written description of the type and amount of both introductory and continuing



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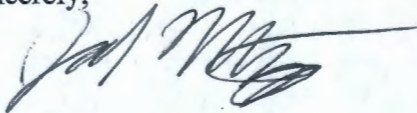
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training for each different waste service provider position was not submitted to Ecology. This was due to your request to wait until 60 days after completion of the Training Conceptual Agreement Package Major Themes Workshops to submit a revised training plan. Ecology adjusts the time to complete the corrective action listed in the December 6, 2017 Central Waste Complex inspection report to June 30, 2018.

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 (RCW 70.105.080 and/or .095).

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

Sincerely,



Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

mrh

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
Al Farabee, USDOE
Tony McKarns, USDOE
Julie Reddick, USDOE
Allison Wright, USDOE
Stephanie Johansen, CHPRC
Stu Mortensen, CHPRC
Linda Petersen, CHPRC
Jon Perry, MSA
ERWM Staff, YN
Ken Niles, ODOE
Debra Alexander, Ecology
Annette Carlson, Ecology

Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
Edward Holbrook, Ecology
Mandy Jones, Ecology
Stuart Luttrell, Ecology
Jared Mathey, Ecology
John Price, Ecology
Ron Skinnarland, Ecology
Alex Smith, Ecology
John Temple, 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 File: 17.588

