



## U.S. Department of Energy Hanford Site

20-ESQ-0065

May 19, 2020

Ms. Alexandra K. Smith, Program Manager  
Nuclear Waste Program  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Smith:

RESPONSE TO WASHINGTON STATE DEPARTMENT OF ECOLOGY REVIEW OF RESPONSES TO DANGEROUS WASTE COMPLIANCE INSPECTIONS ON AUGUST 8, 2017, AUGUST 23, 2017, AND SEPTEMBER 27, 2018, AT THE 400 AREA DANGEROUS WASTE MANAGEMENT UNITS, RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NUMBERS: 17.598 AND 18.652

This is responding to the January 10, 2020, 20-NWP-007 letter regarding the compliance inspections of the 400 Area Dangerous Waste Management Units performed on August 8, 2017, August 23, 2017, and September 27, 2018. On February 4, 2020, the U.S. Department of Energy, Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) declared, in 20-ESQ-0030, Option 1 identified in letter 20-NWP-007, as the path forward to document compliance for alleged compliance Issue 6 cited by the Washington State Department of Ecology (Ecology) in Compliance Inspection Report Index 17.598 and 18.652. Option 1 reads as follows:

“Within 90 days of response to this letter, have the waste containers stored in the ISA inventoried and designated including identification of any Underlying Hazardous Constituents. Verify the waste meets the permit acceptance criteria and place the new inventory and designation records into the facility operating record. If waste does not meet the acceptance criteria, send the waste to a permitted treatment, storage, and disposal facility that will accept this waste.”

CHPRC has updated the Package Identification Number (PIN) files for each of the 19 containers stored in the 400 Area Interim Storage Area. The updated files included a waste designation worksheet; a waste inventory sheet; updated summary sheet to the 2012 PIN files; and a Solid Waste Information Tracking System Waste Container Contents Report (SWIR120). On May 13, 2020, the updated PIN files were placed into the 400 Area Dangerous Waste Management Unit operating record. On May 18, 2020, CHPRC transferred the documentation to Ecology Inspectors Jared Mathey and Phillip Buser through the file transfer portal.

RL appreciates the extension provided by Jared Mathey to complete this documentation.

If you have any questions, please contact me, or your staff may contact Brian J. Stickney, Assistant Manager for Safety and Environment, RL, on (509) 376-9079.

Sincerely

 Digitally signed by Brian T. Vance  
DN: cn=Brian T. Vance, o=Office of River  
Protection, ou=Department of Energy,  
email=brian.t.vance@orp.doe.gov, c=US  
Date: 2020.05.19 18:03:20 -07'00'

Brian T. Vance  
Manager

ESQ:AKW

cc: Dave B. Bartus, EPA  
R. Buck, Wanapum  
J. Bell, Nez Perce  
P. Buser, Ecology  
J. E. Bramson, CHPRC  
T. E. Bratvold, CHPRC  
D. R. Collins, CHPRC  
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M. Marrott, CHPRC  
J. W. Mathey, Ecology  
M. Murphy, CTUIR  
L. C. Petersen, CHPRC  
J. B. Price, Ecology  
D. G. Singleton, CHPRC  
S. A. Szendre, MSA  
K. Schanilec, EPA  
Administrative Record, TSD:  
TS-4-2 (Hardcopy)  
Ecology NWP Library (Hardcopy)  
Environmental Portal, G3-35  
HF Operating Record  
(J. K. Perry, MSA A3-0l)