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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

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March 14, 2018

18-NWP-048

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 August 24, 2017 at the 216-B-3 Main Pond, 216-S-10 Pond and Ditch, 216-B-63 Trench, 216-A-29 Ditch, 216-A-36B Crib, and 216-A37-1 Crib, RCRA Site ID: WA7890008967, NWP Compliance Index Nos 17.607 through 17.612

Reference: Letter 18-ESQ-0032, received on February 7, 2018, "DANGEROUS WASTE COMPLIANCE INSPECTION ON AUGUST 24, 2017, AT THE 216-B-3 MAIN POND, 216-S-10 POND AND DITCH, 216-B-63 TRENCH, 216-A-29 DITCH, 216-A-36B CRIB, AND 216-A37-1 CRIB, RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE POLICY COMPLIANCE INDEX NUMBERS 17.607 THROUGH 17.612"

1248210

Dear Mr. Shoop and Mr. Blackford:

Ecology has reviewed your response letter and enclosures, received on February 7, 2018 (reference). Your letter included responses to corrective action for areas of non-compliance identified in Ecology's August 24, 2017 inspection of the 216-B-3 Main Pond, 216-S-10 Pond and Ditch, 216-B-63 Trench, 216-A-29 Ditch, 216-A-36B Crib, and 216-A37-1 Crib. As noted in the December 18, 2017 compliance report, as of October 24, 2017, areas of non-compliance numbers one and two were addressed. Ecology updated its records indicating that deficiencies of some aspects of well inspections were effective prior to December 2015 and not August 15, 2017 as identified in the corrective action.

Area of non-compliance number three has not been adequately addressed.

**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 training for each different sampler 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.



Mr. Shoop and Mr. Blackford  
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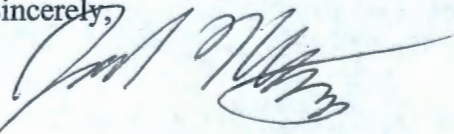
18-NWP-048  
200 Area Cribs, Ditches, Ponds and Trenches  
RCRA Site ID: WA7890008967  
NWP Compliance Index No.: 17.607 through 17.612  
Inspection Date: August 24, 2017

Ecology adjusts the time to complete the corrective action listed in the December 18, 2017, 216-B-3 Main Pond, 216-S-10 Pond and Ditch, 216-B-63 Trench, 216-A-29 Ditch, 216-A-36B Crib, and 216-A37-1 Crib 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](mailto:jared.mathey@ecy.wa.gov).

Sincerely,



Jared Mathey  
Dangerous Waste Compliance Inspector  
Nuclear Waste Program

mrh

cc: See page 3



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200 Area Cribs, Ditches, Ponds and Trenches  
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cc electronic:

Dave Bartus, EPA  
Jack Boller, EPA  
Dave Einan, EPA  
Duane Carter, USDOE  
Cliff Clark, USDOE  
Michael Cline, USDOE  
Doug Hildebrand, USDOE  
Tony McKarns, USDOE  
Allison Wright, USDOE  
Randall Fox, CHPRC  
Linda Petersen, CHPRC  
Deborah Singleton, CHPRC  
Jon Perry, MSA  
ERWM Staff, YN  
Ken Niles, ODOE  
Debra Alexander, Ecology

Annette Carlson, Ecology  
Kathy Conaway, Ecology  
Suzanne Dahl, Ecology  
Mandy Jones, Ecology  
Jared Mathey, Ecology  
Nina Menard, Ecology  
Scott Miller, Ecology  
John Price, Ecology  
Ron Skinnarland, Ecology  
Alex Smith, 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: 17.607 through 17.612

