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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 1, 2017

17-NWP-065

By certified mail.

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. Mark Lindholm, President and Project Manager
Washington River and Protection Solutions, LLC
PO Box 850, MSIN: H3-21
Richland, Washington 99352

Re: Department of Ecology (Ecology) Review of Response to Dangerous Waste Compliance Inspection on March 8, 2016, at the Double-Shell Tank System and 204-AR Waste Unloading Station, RCRA Site ID: WA7890008967, NWP Compliance Index No. 16.554

Reference: See page 2

Dear Mr. Smith and Mr. Lindholm:

Ecology has reviewed your response letter and enclosures, received on May 10, 2017 (Reference). Your letter included corrective actions for items of non-compliance identified in Ecology's March 8, 2016, inspection of the Double-Shell Tank System and 204-AR Waste Unloading Station.

As of May 10, 2017, Ecology determined areas of non-compliance 1, 3, and 4 have been addressed. Ecology may re-inspect your facility to verify that these steps were actually taken, and that your facility remains in compliance.

After reviewing your response letter, Ecology has determined no return to compliance actions have been taken to adequately address areas of non-compliance 2 and 5.

2) **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 173-303-320(1) and WAC 173-303-320(2)(a), (b), and (c) Failure to inspect safety, emergency, operating, and structural equipment that have been categorized as Emergency Use Only - Secondary Containment.

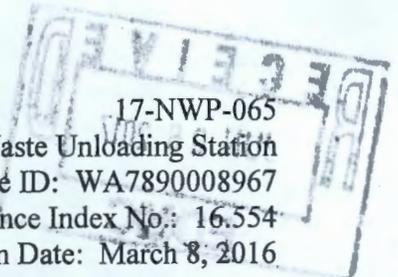
5) **WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A Effect of Permit.**

40 CFR Subpart J §265.191 (a), (b), and (c) Failure to conduct an integrity assessment of emergency pump out lines, slurry transfer lines, supernatant transfer lines, annulus pump pits, drain pits, and central pump pits that are categorized as Emergency Use Only - Secondary Containment or Non-Compliant Deferred Use Components.

S-2-3, T-2-3



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Double-Shell Tank System and 204-AR Waste Unloading Station
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 16.554
Inspection Date: March 8, 2016

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, need further information, or would like to discuss return to compliance for the areas of non-compliance, please contact me at edward.holbrook@ecy.wa.gov or (509) 372-7909.

Sincerely,

Edward Holbrook
Dangerous Waste Compliance Inspector
Nuclear Waste Program

lkd

Reference: Letter 17-ECD-0031, received on May 10, 2017, "Response to the Dangerous Waste Compliance Inspection on March 8, 2016, at the Double-Shell Tank System and 204-AR Waste Unloading Station, Resource Conservation and Recovery Act Site ID: WA7890008967, Nuclear Waste Program Compliance Index No. 16.554"

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cc electronic:

Dave Bartus, EPA
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Mary Beth Burandt, USDOE-ORP
Lori Huffman, USDOE-ORP
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USDOE-RL Correspondence Control
WRPS Correspondence Control
Environmental Portal
Hanford Facility Operating Record

cc: Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Administrative Record
NWP Central File
NWP Compliance Index File: 16.554