



OFFICE OF RIVER PROTECTION

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Richland, Washington 99352

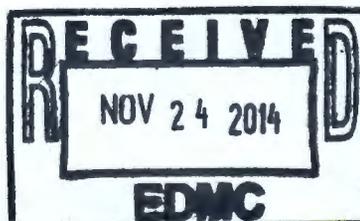
NOV 20 2014



14-ECD-0054

CCN: 271714

Ms. Jane A. Hedges, Program Manager
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3100 Port of Benton Blvd.
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Ms. Hedges:

COMPLIANCE STATUS FOR WASTE GENERATOR ACTIVITIES AT THE WASTE
TREATMENT AND IMMOBILIZATION PLANT CONSTRUCTION SITE

- References:
1. Ecology letter from N. Ware to K. Smith, ORP, and P. McCullough, BNI, "Department of Ecology's (Ecology) Dangerous Waste Compliance Inspection of Generator Activities at the Waste Treatment and Immobilization Plant (WTP), RCRA Site ID WA78900008967, on April 30, 2014," 14-NWP-152, dated July 22, 2014.
 2. ORP letter from K.W. Smith and M.G. McCullough, BNI, to J.A. Hedges, Ecology, "Waste Generator Compliance Plan for the Waste Treatment and Immobilization Plant Construction Site," 14-ECD-0042/CCN: 269741, dated August 20, 2014.

In Reference 1, the Washington State Department of Ecology (Ecology) identified six deficiencies that were observed during its inspection of waste generator activities at the Waste Treatment and Immobilization Plant (WTP) construction site on April 30, 2014. As noted in Reference 2, Items 1, 5, and 6 were corrected at the time of inspection and no further action was required. The remaining three deficiencies associated with training plan requirements for dangerous waste and universal waste (UW) management have been corrected. A summary of the completed corrective actions is provided below:

- The training plan, 24590-WTP-GPP-SENV-017, *90-Day Accumulation Area Training*, has been revised to include groundwater contamination incidents as an element of training, appropriate job descriptions and job titles for affected personnel, and additional required reading for Environmental Project Leads. This revision provides objective evidence of compliance with Item 2 and the first two required actions of Item 3 in Reference 1.

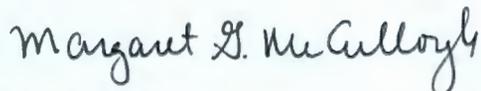
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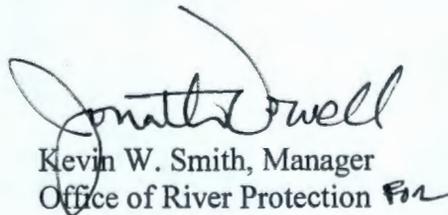
- The qualification plan for 90-Day Accumulation Areas, QAL-5258, "Environmental Project Leads," has been revised to include the job title for Environmental Project Leads, the training requirement for waste segregation, and Hazardous Waste Operations and Emergency Response initial and refresher training requirements. This revision, in addition to relevant training records, provides objective evidence of compliance with the remaining three required actions of Item 3 in Reference 1.
- The training course, "HGET – Hanford General Employee Training – Bechtel WTP (HGET)," Revision 1, (24590-WTP-CRM-TRA-000001), has been revised with an expanded discussion of waste management, including all UW types managed at the WTP construction site to provide general UW awareness training for WTP personnel. This revision provides objective evidence of compliance with the required actions of Item 4 in Reference 1.
- An updated UW training bulletin was presented to WTP construction personnel who potentially generate UW in July 2014. This training bulletin provides further objective evidence of compliance with the requirements of Item 4 in Reference 1.

Hard copies of the revised training plan, qualification QAL-5258, relevant training records, HGET documentation, and UW training bulletin and attendance rosters were provided to Ecology and an Ecology receipt was obtained on November 6, 2014. This documentation provided objective evidence that all the required corrective actions in Items 2, 3, and 4 were completed in accordance with Reference 2, and waste generator activities at the WTP construction site are in compliance with WAC 173-303, *Dangerous Waste Regulations*.

If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, Office of River Protection, (509) 376-0104, or Roger Landon, Bechtel National, Inc., Environmental Protection Manager (509) 371-2165.



M. G. McCullough, Project Director
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cc: See page 3

Ms. Jane A. Hedges
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