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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

December 1, 2016

16-NWP-207

By certified mail

Mr. Doug S. Shoop, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: A7-50  
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO  
CH2M HILL Plateau Remediation Company  
PO Box 1600, MSIN: H7-30  
Richland, Washington 99352

Re: Closure Notice for Container Storage Areas Located in the 400 Area Management Unit

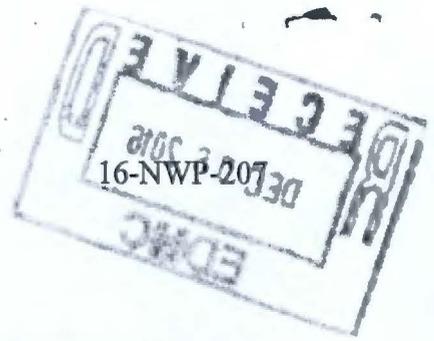
Dear Mr. Shoop and Mr. Ciucci:

The purpose of this letter is to notify the United States Department of Energy (USDOE) and CH2M HILL Plateau Remediation Company (CHPRC) of a failure to submit closure notice for container storage areas located in the 400 Area Waste Management Unit (WMU): the Interim Storage Facility (ISA) and Fuel Storage Facility (FSF). These container storage areas are permitted under the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste (Site-wide Permit)*, WA7890008967, Part III, 400 Area WMU Operating Unit Group 16 (OUG-16).

In accordance with the *Site-wide Permit*, Part III, OUG-16, Addendum H, Closure Plan, and pursuant to Washington Administrative Code (WAC) 173-303-610(3)(c), facility operators must notify Ecology prior to beginning either partial or final closure of these container storage areas. Specifically, Addendum H, Section H.4, requires that the permittee provide to Ecology at least 45 days prior to the start of closure of the FSF or the ISA. Start of closure is the date the facility operator "expects to begin closure." Under Washington's dangerous waste regulations, that date is either: 1) no later than thirty days after the date on which the container storage area receives the known final volume of dangerous wastes; or 2) no later than one year after the date on which the container storage area received the most recent volume of dangerous waste if there is a reasonable possibility it will receive additional dangerous wastes. WAC 173-303-610(3)(c)(ii)(A). By either measure, both the notification requirement and the date by which USDOE and CHPRC should have expected to begin closure have long expired with regard to the FSF and the ISA. The last receipt of waste in the FSF (which has 2 containers) was in 2006, and the last receipt of waste in the ISA (which has 19 containers) was in 2009.



Mr. Shoop and Mr. Ciucci  
December 1, 2016  
Page 2 of 3



As a result, USDOE and CHPRC must choose one of two options for these container storage areas.

First, the USDOE and CHPRC may request the one-year extension to starting closure described above, subject to a demonstration to Ecology that these storage areas have the capacity to receive additional dangerous wastes and that USDOE and CHPRC have taken, and will continue to take, all steps to prevent threats to human health and the environment, including compliance with all applicable Site-wide Permit requirements. WAC 173-303-610(c)(ii)(A).

Second, and if USDOE and CHPRC cannot demonstrate that these storage areas have additional capacity and are likely to receive additional wastes, USDOE and CHPRC must move forward with closure of these areas. If this is the case, pursuant to the closure plan USDOE and CHPRC must submit a Class 2 permit modification request to update the Part III, OUG-16, Addendum H Closure Plan, to include a closure schedule that addresses intervening closure activities (e.g., time needed to remove waste inventory, perform document reviews, verify meeting performance standards, decontaminate or remove equipment, decontaminate structures, and remediate any contaminated soils). Condition H.2; Condition H.4; WAC 173-303-610(3)(a)(vii). Updates to the Addendum H Closure Plan must also include any other changes necessary to ensure it is true, accurate, and complete. WAC 173-303-810(12)-(13). Once the updated closure plan is approved according to Permit Condition I.C.3, USDOE and CHPRC must close in accordance with the approved closure plan.

Please notify Ecology within 30 days of your intentions with regard to these units.

If you have questions, please contact Kathy Conaway, Dangerous Waste Compliance Inspector, at [kathy.conaway@ecy.wa.gov](mailto:kathy.conaway@ecy.wa.gov) or (509) 372-7890.

Sincerely,

Alexandra K. Smith  
Program Manager  
Nuclear Waste Program

kc/tkb

cc: See page 3

Mr. Shoop and Mr. Ciucci  
December 1, 2016  
Page 3 of 3

16-NWP-207

cc electronic:

Dave Bartus, EPA  
Jack Boller, EPA  
Dennis Faulk, EPA  
Kevin Schanilec, EPA  
Duane Carter, USDOE  
Cliff Clark, USDOE  
Tony McKarns, USDOE  
Allison Wright, USDOE  
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Environmental Portal  
Hanford Facility Operating Record

cc: Rod Skeen, CTUIR  
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Steve Hudson, HAB  
Administrative Record  
NWP Central File