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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 14, 2018

18-NWP-047

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 22, 2017 at the Non-Radioactive Dangerous Waste Landfill (NRDWL) and Low Level Burial Grounds (LLBG) – Green Islands, RCRA Site ID: WA7890008967, NWP Compliance Index Nos 17.605 and 17.606

Reference: Letter 18-ESQ-0031, received on February 7, 2018, "DANGEROUS WASTE COMPLIANCE INSPECTION ON AUGUST 22, 2017, AT THE NON-RADIOACTIVE DANGEROUS WASTE LANDFILL (NRDWL) AND LOW LEVEL BURIAL GROUNDS (LLBG) – GREEN ISLANDS, RESOURCE CONSERVATION AND RECOVERY ACT SITE ID: WA7890008967, NUCLEAR WASTE POLICY COMPLIANCE INDEX NUMBERS 17.605 AND 17.606"

1248209

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 areas of non-compliance identified in Ecology's August 22, 2017 inspection of the NRDWL and LLBG – Green Islands. As noted in the December 18, 2017, compliance report, as of September 12, 2017, area of non-compliance number one was 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.

Areas of non-compliance numbers two and three have not been adequately addressed.

Area of Non-Compliance Two - WAC 173-303-330(2): In reviewing your response, revised written training plans 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 were 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 revised training plans. Ecology adjusts the time to complete the corrective actions listed in the December 18, 2017, NRDWL and LLBG – Green Islands inspection report to June 30, 2018.



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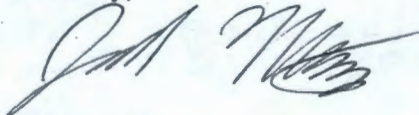
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NWP Compliance Index No.: 17.605 and 17.606
Inspection Date: August 22, 2017

Area of Non-Compliance Three - WAC 173-303-310(2)(a): In reviewing your response, signs were not posted at the LLBG – Green Islands, Waste Management Area 2 in accordance with WAC 173-303-310(2)(a). You specified existing Hanford facility signs posted at area boundaries within the Hanford site are sufficient because this is a non-operating treatment, storage, and disposal (TSD) unit. However, being a non-operating TSD unit does not relieve you from complying with the dangerous waste regulations. In addition, you cited Section 3.1.1 of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C Permit Attachment 3*, which is not applicable to the LLBG – Green Islands at this time.

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.

Sincerely,



Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

mrb

cc: See page 3

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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
Stephanie Johansen, CHPRC
Linda Petersen, CHPRC
Jon Perry, MSA
ERWM Staff, YN
Ken Niles, ODOE
Debra Alexander, Ecology
Annette Carlson, Ecology

Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Jackson Davis, Ecology
Kelly Elsethagen, Ecology
Mandy Jones, Ecology
Stuart Luttrell, Ecology
Jared Mathey, Ecology
John Price, Ecology
Ron Skinnarland, Ecology
Alex Smith, Ecology
John Temple, 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: 17.605 and 17.606