



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 15, 2020

20-NWP-074

Brian T. Vance, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: H5-20  
Richland, Washington 99352

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 November 13, 2018 and January 28, 2019, at the T-Plant Complex, RCRA Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No.: 18.653

Reference: See page 2

Dear Brian T. Vance and Ty Blackford:

Ecology has reviewed your response letter and enclosures, received on April 13, 2020 (reference). Your letter included corrective action for a non-compliance finding identified in Ecology's November 13, 2018 and January 28, 2019, inspection of the T-Plant Complex. **Ecology disagrees with your response to area of non-compliance two.** However, from the information you submitted, as of April 13, 2020, area of non-compliance two will be considered addressed.

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

**3. WAC 173-303-800 - Permit requirements for dangerous waste management facilities (2):** From review of your April 13, 2020 response, USDOE-RL and CHPRC has not submitted to Ecology a permit application for 221T Tank 11-L in accordance with WAC 173-303-806.

If you have questions or need further information, please contact me at [kathy.conaway@ecy.wa.gov](mailto:kathy.conaway@ecy.wa.gov) or (509) 492-1610.

Sincerely,

Digitally signed by Conaway,  
Kathy (ECY)  
Date: 2020.04.15 15:56:38 -07'00'

Kathy Conaway  
Dangerous Waste Compliance Inspector  
Nuclear Waste Program

kc/tla  
cc: See page 2

Brian T. Vance and Ty Blackford  
April 15, 2020  
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20-NWP-074  
T-Plant Complex  
RCRA Site ID: WA7890008967  
NWP Compliance Index No.: 18.653  
Inspection Date: November 13, 2018 and January 28, 2019

Reference:

1. Letter 20-ESQ-0051, received on April 13, 2020, "Response to Washington State Department of Ecology review of response to dangerous waste compliance inspection on November 13, 2018 and January 28, 2019, at T-Plant Complex, Resource Conservation and Recovery Act Site ID: WA7890008967, Nuclear Waste Program Compliance Index Number: 18.653"

cc electronic:

Dave Bartus, EPA	Kelly Elsethagen, Ecology
Dave Einan, EPA	Jared Mathey, Ecology
Cheryl Williams, EPA	John Price, Ecology
Ben Harp, USDOE-ORP	Jonathan Rogers, NWP Compliance
Duane Carter, USDOE-RL	Index File: 18.653
Tony McKarns, USDOE-RL	Stephanie Schleif, Ecology
Ingrid (Siddoway) Colton, USDOE-RL	Alex Smith, Ecology
Allison Wright, USDOE-RL	NWP RIM Coordinators, Ecology
Mark French, USDOE-RL	Susan Leckband, HAB
Linda Petersen, CHPRC	Mason Murphy, CTUIR
Jon Perry, MSA	Jack Bell, NPT
Steve Szendre, MSA	Laurene Contreras, YN
ERWM Staff, YN	Environmental Portal
Ken Niles, ODOE	Hanford Facility Operating Record
Caroline Cress, AAG	TPA Administrative Record
Deb Alexander, Ecology	CHPRC Correspondence Control
Kathy Conaway, Ecology	MSA Correspondence Control
Jackson Davis, Ecology	USDOE-RL Correspondence Control