





STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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December 10, 2018

18-NWP-193

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: Washington State Department of Ecology (Ecology) Review of Response to Dangerous Waste Compliance Inspection on January 11, 2018, at B Plant, RCRA Site ID: WA7890008967, NWP Compliance Index No 18.622

Reference: Letter 19-ESQ-0003, received on October 29, 2018, "Response to Dangerous Waste Compliance Inspection on January 11, 2018, at B Plant, Resource Conservation and Recovery Act Site ID: WA7890008967, Nuclear Waste Program Compliance Index Nos.: 18.622"

Dear Doug S. Shoop and Ty Blackford:

Ecology reviewed your response letter received on October 29, 2018 (reference). Your letter included corrective action for items of non-compliance identified in Ecology's January 11, 2018, inspection of B Plant. As of October 29, 2018, area of non-compliance one has been partially addressed.

Your written response indicated the white lead based paint on the floor in B Plant designated as dangerous waste and will be disposed of as a part of the final Comprehensive Environmental Resource Compensation Liability Act (CERCLA) action at B Plant. The B Plant canyon has no approved CERCLA decision governing operations at this time. In accordance with DOE/RL-99-24 Rev. 3, Surveillance and Maintenance Plan for the 221-B Facility (B Plant) and Washington Administrative Code 173-303, removal of this generated dangerous waste from the B Plant canyon must be under these authorities. Ecology adjusts the time to complete the corrective action for the area of non-compliance listed in the August 2, 2018, B Plant compliance report (Compliance Index No. 18.622) to September 30, 2019.

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 (Revised Code of Washington 70.105.080 and/or .095).



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Doug S. Shoop and Ty Blackford December 10, 2018 Page 2 of 2



RCRA Site ID: WA7896908967 NWP Compliance Index No.: 18.622 Inspection Date: January 11, 2018

If you have questions or need further information, please contact me at <u>jared.mathey@ecy.wa.gov</u> or (509) 372-7949.

Sincerely,

Jared Mathey

Dangerous Waste Compliance Inspector

Nuclear Waste Program

SO

cc electronic:

Dave Bartus, EPA
Jack Boller, EPA
Dave Einan, EPA
Duane Carter, USDOE
Cliff Clark, USDOE
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Ron Skinnarland, Ecology
Alex Smith, Ecology
Bridgette Weese, Ecology
Environmental Portal
Hanford Facility Operating Record
CHPRC Correspondence Control
MSA Correspondence Control
USDOE-RL Correspondence Control

cc:

Matt Johnson, CTUIR
Jack Bell, NPT
Laurene Contreras, YN
Susan Leckband, HAB
Administrative Record
NWP Central File
NWP Compliance Index File: 18.622