



1248896
[0065844H]

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

May 3, 2018

18-NWP-074

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's (Ecology) Review of Responses to Dangerous Waste Compliance Inspection on May 2, 2017 at the Low Level Burial Grounds Trenches 31 and 34, RCRA Site ID: WA7890008967, NWP Compliance Index No 17.590

Reference: See page 2

Dear Mr. Shoop and Mr. Blackford:

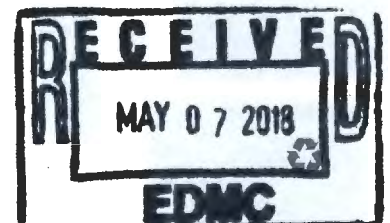
Ecology has reviewed your response letter and enclosures received on April 24, 2018 (reference). Your letter included corrective actions for items of non-compliance identified in Ecology's May 2, 2017 inspection of Low Level Burial Grounds Trenches 31 and 34.

In reviewing the submitted analytical results for Container 0003290, Ecology is withdrawing non-compliance four in the inspection findings. Ecology considers the representative container (#0003290) and its documentation to confirm Land Disposal Restriction compliance for the group of waste packages (including Container EFSG-93-0-0074), to be a part of the operating records originally requested. Subsequently, Ecology is including the failure to furnish operating records requested during the inspection to non-compliance three because these operating records were submitted in response to the report. As of April 24, 2018, area of non-compliance three has been addressed.

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

Area of Non-Compliance One - WAC 173-303-200(1)(d) and WAC 173-303-9904(1):

In reviewing your response, Container 0085591 was not labeled in a manner which adequately identified the major risks associated with the contents of the container for employees, emergency response personnel, and the public. Designation records identified the F039 dangerous waste code as a toxic hazard code. No evidence was submitted to Ecology that a major risk of toxic was added to Container 0085591.



Mr. Shoop and Mr. Blackford
May 3, 2018
Page 2 of 3

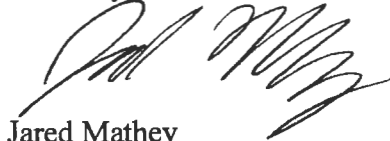
18-NWP-074
Low Level Burial Grounds Trenches 31 and 34
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 17.590
Inspection Date: May 2, 2017

Area of Non-Compliance Two - WAC 173-303-330(2)(a) and (b): In reviewing your response, you requested that training plan issues be delayed until June 30, 2018. Ecology approves your request, and adjusts the time to complete the corrective action listed in the January 25, 2018, Low Level Burial Grounds Trenches 31 and 34 inspection report to June 30, 2018.

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,



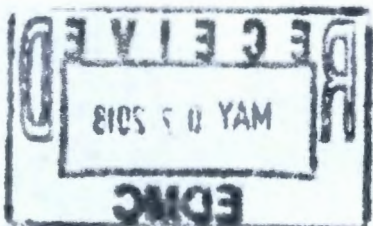
Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

mrb

Reference: Letter 18-ESQ-0058, received on April 24, 2018, "Response to dangerous waste compliance inspection on May 2, 2017, at the Low Level Burial grounds Trenches 31 and 34 Resource Conservation and Recovery Act Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index 17.590"

1248861

cc: See page 3



Mr. Shoop and Mr. Blackford
May 3, 2018
Page 3 of 3

18-NWP-074
Low Level Burial Grounds Trenches 31 and 34
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 17.590
Inspection Date: May 2, 2017

cc electronic:

Dave Bartus, EPA
Jack Boller, EPA
Dave Einan, EPA
Duane Carter, USDOE
Cliff Clark, USDOE
Al Farabee, USDOE
Tony McKarns, USDOE
Julie Reddick, USDOE
Allison Wright, USDOE
Stephanie Johansen, CHPRC
Stuart Mortensen, CHPRC
Linda Petersen, CHPRC
Jon Perry, MSA
ERWM Staff, YN
Ken Niles, ODOE
Debra Alexander, Ecology

Kathy Conaway, Ecology
Suzanne Dahl, Ecology
Kelly Elsethagen, Ecology
Stuart Luttrell, Ecology
Jared Mathey, Ecology
Scott Miller, 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: 17.590