



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 9, 2021

21-NWP-040

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

John R. Eschenberg, President
Washington River Protection Solutions, LLC
PO Box 850, MSIN: H3-04
Richland, Washington 99352

Re: The Department of Ecology (Ecology) Review of Responses to Dangerous Waste Compliance Inspection on April 20, 2020, at the Double-Shell Tank System & 204-AR Waste Unloading Station RCRA Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No.: 20.699

Reference: See page 2

Dear Brian T. Vance and John R. Eschenberg:

Ecology has reviewed your response letter and enclosures, received on March 8, 2021 (reference). Your letter included corrective actions for items of non-compliance one and three identified in Ecology's April 20, 2020 inspection of Double-Shell Tank System & 204-AR Waste Unloading Station. As of March 8, 2021, area of non-compliance one has been addressed.

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

3. Permit Condition I.A, WAC 173-303-400(3), and 40 CFR 265.195: From reviewing your response, you have not inspected daily, and documented in inspection logs, all DST monitoring systems in 274-AW. This is monitored data on leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) and all overflow/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems). Additionally, and importantly, Ecology has not been provided records verifying the above inspections occurred nor an update to the facility operating record for the dates that these inspections did not occur in the past. Lastly, the Rev. 9 permitting workshops cannot resolve these areas of non-compliance for DST monitoring systems in 274-AW, as these regulatory requirements apply now to your facility.

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 70A.300).

Brian T. Vance and John R. Eschenberg
March 9, 2021
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Double-Shell Tank System & 204-AR Waste Unloading Station
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 20.699
Inspection Date: April 20, 2020

If you have questions or need further information, please contact me at (360) 481-9830 or jared.mathey@ecy.wa.gov.

Sincerely,



Digitally signed by Mathey,
Jared W. (ECY)
Date: 2021.03.09 16:33:52
-08'00'

Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tla

Reference:

Letter 21-TF-000784, received on March 8, 2021, Ecology, "Response to Washington State Department of Ecology Dangerous Waste Compliance Inspection Report No. 20.699 alleged non-compliances 1 and 3"

cc electronic:

Dave Bartus, EPA
Dave Einan, EPA
Cheryl Williams, EPA
Kaylin Burnett, USDOE-ORP
Lori Huffman, USDOE-ORP
Christopher Kemp, USDOE-ORP
Gae Neath, USDOE-ORP
Joe Sondag, USDOE-ORP
Bryan Trimberger, USDOE-ORP
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James Hamilton, WRPS
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Index File: 20.699
Stephanie Schleif, Ecology
Dan Thompson, Ecology
Mign Walmsley, Ecology
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