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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 15, 2015

15-NWP-169

By certified mail

Ms. Stacy Charboneau, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: A7-50  
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO  
CH2M HILL Plateau Remediation Company  
PO Box 1600, MSIN: H7-30  
Richland, Washington 99352

Re: Washington Administrative Code (WAC) 173-303-330(2), Training Plan Violations,  
Resources Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear  
Waste Program Compliance Index Nos.: 14.511, 15.513, and 15.520

Dear Ms. Charboneau and Mr. Ciucci:

Dangerous waste compliance inspections were conducted by the Department of Ecology  
(Ecology) at:

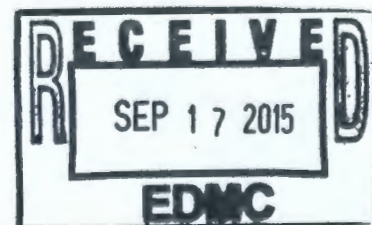
- Trench 94 on November 18, 2014
- T Plant Complex on January 22, 2015
- Waste Receiving and Processing (WRAP) facility on April 29, 2015

In the inspection report for each facility, Ecology identified non-compliance with WAC 173-303-400, and by reference, WAC 173-303-330(2) for failure to include a list of all job titles/positions in the facility dangerous waste training plan.

Ecology received a similar response from the United States Department of Energy – Richland Operations Office (USDOE-RL) and CH2M HILL Plateau Remediation Company (CHPRC) for the Trench 94 and T Plant violations, indicating that USDOE-RL and CHPRC believes that the dangerous waste training plans for these units are compliant with this regulation.

Ecology has preliminarily identified additional violations and concerns for compliance with WAC 173-303-330 during the recent Ecology compliance inspections at the:

- Central Waste Complex
- Single-Shell Tanks
- Double-Shell Tanks
- Low Level Burial Grounds, Trenches 31 and 34



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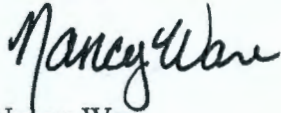
15-NWP-169  
RCRA Site ID: WA7890008967  
NWP Compliance Index Nos.: 14.511, 15.513, 15.520  
Inspection Dates: Nov. 18, 2014, Jan. 22, 2015, April 29, 2015

While Ecology maintains that identification of the training violations for Trench 94, T Plant, and WRAP are valid and appropriate, we believe it is in the best interest of Ecology, USDOE-RL, and USDOE-RL contractors for Ecology to exercise enforcement discretion on these violations until a site-wide training inspection can be performed at a future date. Ecology is making this decision with the goal of preventing duplicative efforts and saving time and resources for all.

The violations at these units will remain open violations and will be absorbed into the upcoming site-wide training inspection. No response or action is required for USDOE-RL and CHPRC for the training violations at this time.

If you have questions or need further information, please contact me at [nancy.ware@ecy.wa.gov](mailto:nancy.ware@ecy.wa.gov) or (509) 372-7912.

Sincerely,



Nancy Ware  
Dangerous Waste Compliance Inspector  
Nuclear Waste Program

tkb

cc electronic:

Dave Bartus, EPA  
Jack Boller, EPA  
Dennis Faulk, EPA  
Cliff Clark, USDOE  
Michael Collins, USDOE  
Laura Cusack, CHPRC  
Joel Williams, Jr., CHPRC  
Jon Perry, MSA  
Ken Niles, ODOE  
Debra Alexander, Ecology  
Kathy Conaway, Ecology  
Suzanne Dahl, Ecology  
Kelly Elsethagen, Ecology  
Jared Mathey, Ecology  
John Price, Ecology  
Deborah Singleton, Ecology

cc electronic:

Ron Skinnarland, Ecology  
Nancy Ware, Ecology  
Environmental Portal  
Hanford Facility Operating Record

cc: Rod Skeen, CTUIR  
Gabriel Bohnee, NPT  
Russell, Jim, YN  
Steve Hudson, HAB  
Administrative Record  
CHPRC Correspondence Control  
NWP Central File  
NWP Compliance Index File:  
14.511, 15.513, 15.520  
NWP Reader File