



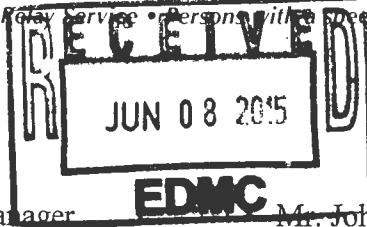
STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 2, 2015

15-NWP-102



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: Response to United States Department of Energy – Richland Operations Office’s Letter 15-AMRP-0178, Dated May 12, 2015, “207-A South Retention Basin, Dangerous Waste Compliance Inspection,” Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.516

Dear Ms. Charboneau and Mr. Ciucci:

The Department of Ecology (Ecology) issued letter 15-NWP-059, dated March 27, 2015, to United States Department of Energy – Richland Operations Office (USDOE-RL) and CH2M HILL Plateau Remediation Company (CHPRC). This letter transmitted the inspection report for the 207-A South Retention Basin, NWP Compliance Index No. 15.516.

USDOE-RL and CHPRC did not return the completed, signed Compliance Certificate within thirty days of receipt as instructed. Ecology did receive a response from USDOE-RL and CHPRC for the three identified violations relating to the 207-A South Retention Basin.

As stated in your response letter, it is the intention of USDOE-RL to revise and provide Ecology a closure plan. A revised 207-A South Retention Basin closure plan that provides the closure activities, a closure schedule, and inspection plan for closure (incorporated into the site-wide permit via a permit modification) could address Violations 1 and 3. Ecology notes that these items will remain violations and are subject to enforcement until resolved through the below cited corrective actions.

**Violation 1 – Types of Problems to be Looked for During the Performance of General Facility Inspections**

In accordance with Hanford Site-wide RCRA Permit Condition I.A, general inspections at 207-A South Retention Basin are subject to the requirements of Washington Administrative Code (WAC) 173-303-400, Interim status facility standards. WAC 173-303-400(3)(a)(i) requires, among other things, compliance with the facility requirements of WAC 173-303-280 through 173-303-440 except WAC 173-303-335. USDOE-RL must continue to maintain compliance with all applicable interim status standards of WAC 173-303-400(3) at the 207-A South Retention Basin until a final status permit is issued or until closure of the unit group. Contrary to the USDOE-RL and CHPRC response, problems to be looked for cannot be “limited” in scope.



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because the facility has not received dangerous waste for 28 years. Until a complete closure plan is submitted to Ecology and approved to begin closure, 207-A South Retention Basin must meet interim status requirements of WAC 173-303-320, General inspection.

**Action Required:** Within 60 days of receipt of this letter, Ecology requires that USDOE-RL and CHPRC submit a written response that identifies all actions the facility has taken or will take to correct the violation by updating the checklist (Attachment 1 from USDOE-RL and CHPRC response) to include these problems to be looked for during an inspection. **Or** within 60 days of receipt of this letter, USDOE-RL and CHPRC must submit a closure plan for the 207-A South Retention Basin to Ecology. The closure plan must ultimately be incorporated into the site-wide permit according to the requirements of WAC 173-303-830, Permit changes.

#### **Violation 2 – Inspection Log – Date and Time Inclusion**

The USDOE-RL and CHPRC response to Violation 2, inclusion of date and time on inspection logs, is acceptable. The documentation provided to add a note to the operating record for missing information on prior inspection records is sufficient, and closes out this violation.

#### **Violation 3 – Remedy of Problems Noted on Inspection Logs**

DOE/CHPRC Response: “In regards to the items noted in previous inspection reports, no remedial action is necessary. Deterioration of the elastomeric coating will not cause or lead to the release of dangerous waste constituents to the environment or a threat to human health since the basin cells have not received dangerous waste for 28 years, sampling and analysis confirms that residual concentrations are below cleanup levels, and there is no evidence of leaks from the basin. Similarly, the presence of water in the basin would not lead to the release of dangerous waste constituents to the environment or a threat to human health.”

The sampling and analysis data referred to above was not submitted to Ecology in USDOE-RL and CHPRC’s response; nor was any documentation that there is no evidence of leaks from the basin included.

**NOTE:** If USDOE-RL has sampling and analysis data and other documentation on the concrete, elastomeric coating, or groundwater that you would like Ecology to consider, submit this documentation to the NWP Ecology Clean-up Section (Nina Menard or Dwayne Crumpler) for consideration.

There is no liner in this surface impoundment, and there is no groundwater monitoring being performed at the surface impoundment. Remedial action is not only necessary, but it is required, whenever inspections note deterioration of the surface impoundment coating or the presence of liquids in the surface impoundment. Problems must be corrected immediately or placed on a schedule for remedy. A closure plan would include a closure schedule, inspection plan, etc. and could meet the intention of this requirement.

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**Action Required:** Within 60 days of receipt of this letter, Ecology requires that USDOE-RL and CHPRC submit a written response that identifies all actions the facility has taken or will take to correct the violation to remedy problems identified during an inspection. **Or** within 60 days of receipt of this letter, USDOE-RL and CHPRC must submit a closure plan for the 207-A South Retention Basin to Ecology. The closure plan must ultimately be incorporated into the site-wide permit according to the requirements of WAC 173-303-830, Permit changes.

Failure to comply with these requirements within 60 days could result in an administrative order and a penalty of up to \$10,000 per day for each violation.

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-RL  
Michael Collins, USDOE-RL  
Joel Williams, Jr., CHPRC  
Jon Perry, MSA  
Ken Niles, ODOE  
Kathy Conaway, Ecology  
Dwayne Crumpler, Ecology  
Edward Holbrook, Ecology  
Jared Mathey, Ecology  
Nina Menard, Ecology  
John Price, Ecology  
Nancy Ware, Ecology  
Permit Coordinators, 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: 15.516  
NWP Reader File