



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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18-ESQ-0106

OCT 31 2018

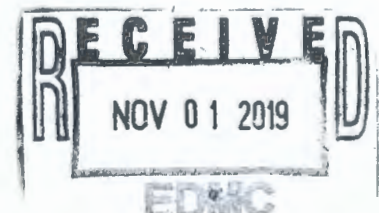
Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

RESPONSE TO DANGEROUS WASTE COMPLIANCE INSPECTION ON FEBRUARY 26, 2018, AT THE LOW LEVEL BURIAL GROUNDS, TRENCHES 31 AND 34, RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NO.: 18.624

This is in response to the August 31, 2018, (18-NWP-146) letter regarding the compliance inspection of the Low-Level Burial Grounds, Trenches 31 and 34, performed on February 26, 2018. Your letter was officially received on September 5, 2018. The U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) have reviewed the item identified as an alleged non-compliance with Dangerous Waste Regulations cited by the Washington State Department of Ecology. A copy of the requested operating record update is provided in Enclosure 1.

This operating record update consists of the Addendum to Treatment, Storage, and Disposal Record and revised Land Disposal Restrictions (LDR) Notification and Certification to include the U.S. Environmental Protection Agency (EPA) Manifest Number, 015483014JJK, Enclosure 2. The LDR Notification and Certification Form associated with Shipment WR1701 and Container MW17700053 was completed and provided to CHPRC by Perma-Fix Northwest. The updated form has been captured in the operating record. For future receipt of waste shipments, CHPRC will verify the EPA manifest number is included on the LDR Notification and Certification Form as required by 40 CFR 268.7(b)(3)(ii).



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Ms. Alexandra K. Smith
18-ESQ-0106

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If you have any questions, please contact me, or your staff may contact Brian J. Stickney, Acting Assistant Manager for Safety and Environment, on (509) 376-9079.

Sincerely,



Doug S. Shoop
Manager

ESQ:ACM

Enclosures:

1. Addendum to the Treatment Storage and Disposal Record
2. LDR Notification and Certification for MW177000053

cc w/encls:

Jack L. Boller, EPA
Noah S. Cruz, CHPRC
Jackson Davis, Ecology
Jared W. Mathey, Ecology
Linda C. Petersen, CHPRC
John B. Price, Ecology
Stephen A. Szendre, MSA
Administrative Record, H6-08: D-2-9 (Hardcopy)
Ecology NWP Library (Hardcopy)
Environmental Portal, G3-35
HF Operating Record (J. K. Perry, MSA A3-01)

cc w/o encls:

Dave B. Bartus, EPA
Jack Bell, Nez Perce
Rex Buck, Jr., Wanapum
Kathleen A. Conaway, Ecology
Laura J. Cusack, CHPRC
David R. Einan, EPA
Moses N. Jaraysi, CHPRC
Stephanie K. Johansen, CHPRC
Matt Johnson, CTUIR
Rose Longoria, YN
Kevin Schanilec, EPA
Kalli Shupe, CHPRC
Connie J. Simiele, CHPRC
Ron R. Skinnerland, Ecology

ENCLOSURE 1

**ADDENDUM TO THE TREATMENT STORAGE
AND DISPOSAL RECORD**

Consisting of 2 pages (including this cover page.)

ADDENDUM TO TREATMENT STORAGE & DISPOSAL RECORD

SECTION 1

This addendum describes new and/or revised data for waste managed at the SWOC TSD Facilities (Low-Level Burial Grounds, Central Waste Complex, Waste Receiving and Processing Facility, T Plant Complex). This form, along with any attachments, documents official changes to the TSD Operating Record for the solid waste package(s) referenced.

Package ID(s):

MW17700053, MW17700013, MW17700014

Date of Change: 09/12/2018

Justification for Changes:

Added the manifest number to the LDR.

Summary of Changes:

Label Review *M 9/12/18*
NA

Supporting Documentation:

1) Correct LDR form

Attachment(s):

LDR form

Updated Storage Category:

NA *M 9-12-18*

SECTION 2

Updated Container Marking: (check all that apply)

EPA Hazardous Waste Sticker	<input type="checkbox"/>	PCB	<input type="checkbox"/>	Orientation Arrows	<input type="checkbox"/>
Dangerous Waste Sticker	<input type="checkbox"/>	Toxic	<input type="checkbox"/>	Fissile	<input type="checkbox"/>
Caution Radioactive Material/Waste	<input type="checkbox"/>	Asbestos Warning	<input type="checkbox"/>	Beryllium Warning	<input type="checkbox"/>
Other:	<input type="checkbox"/>	Other:	<input type="checkbox"/>	Other:	<input type="checkbox"/>

Updated Container Labels: (check all that apply)

Flammable Liquid	<input type="checkbox"/>	Corrosive	<input type="checkbox"/>	Other:	<input type="checkbox"/>
Flammable Solid	<input type="checkbox"/>	Oxidizer	<input type="checkbox"/>	Other:	<input type="checkbox"/>

SECTION 3

Label Verification:

Facility:

Unit:

Module:

Tier Level:

Tier Position:

Completed By:

M 9-12-18

Print Name

Signature

Date

REVISION AND REVIEW APPROVALS FOR SECTION 1 AND 2

Change Completed by:

Mei Lakes

Print Name

Mei Lakes

Signature

09/12/2018

Date

Change Reviewed by:

Richard L. Austin

Print Name

Richard L. Austin

Signature

9-12-2018

Date

ENCLOSURE 2

**LAND DISPOSAL RESTRICTIONS
NOTIFICATION AND CERTIFICATION FORM**

Consisting of 4 pages (including this cover page.)

Land Disposal Restrictions Notification and Certification Form

1. Generator and Shipment Information

Generator: WRPS
 EPA ID #: WA7890008967
 Manifest #: ~~WR4704~~ 01548304 JJK
 Profile #: PFNW-930-0004
 Containers: see attached

NS
9-11-18

2. Is waste analysis information attached? Yes Provided with Waste Profile Sheet Not available

3. Wastewater category: Wastewater Nonwastewater

4. Subcategories and Certification Statements Table

Select the applicable waste code and LDR subcategory or waste description. For each subcategory, select the applicable certification statement code from the Notification and Certification Statements page. The Notification and Certification Statements page must be attached.

Waste Code	LDR Subcategory or Waste Description	Certification Statement
D008	Lead characteristic	C2
F001	F001 - F005 spent solvent wastes	C2
F002	F001 - F005 spent solvent wastes	C2
F003	F001 - F005 spent solvent wastes	C2
F004	F001 - F005 spent solvent wastes	C2
F005	F001 - F005 spent solvent wastes	C2

5. Specific LDR constituents: Check any of the following that apply. If any are checked, attach the LDR Constituent Addendum to identify the the Underlying Hazardous Constituents and/or constituents requiring treatment:

- Characteristic waste contains Underlying Hazardous Constituents subject to treatment
- F001 - F005 waste constituents of concern
- F039 waste constituents of concern
- Hazardous debris subject to the alternative treatment standards of 40CFR 268.45
- Contaminated soil subject to the alternative treatment standards of 40CFR 268.49

Notification and Certification Statements

NS
9-11-18

Generator: WRPS
EPA ID #: WA7890008967
Manifest #: ~~WR1701~~ 015483014 JJK
Profile #: PFNW-930-0004
Containers: see attached

The following notification and/or certification statement(s) apply to the waste on this shipment.

Code	Certification Statement
C2	Debris that has been treated to meet the alternative treatment standards for debris (268.45). "I certify under penalty of law that the debris has been treated in accordance with the requirements of 40 CFR 268.45. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

Name (print): Jack Thompson
Signature: [Signature]
Date: 8-1-17

Generator: WRPS
 EPA ID #: WA7890008967
 Manifest #: ¹³⁵ ~~WR178~~ 01548 3014 JJK
 Profile #: ⁹⁻¹¹⁻¹⁰ PFNW-930-0004

PIN	Waste Codes
MW17700053	F001, F002, F003, F004, F005
MW17700013	D008, F001, F002, F003, F004, F005
MW17700014	F001, F002, F003, F004, F005