



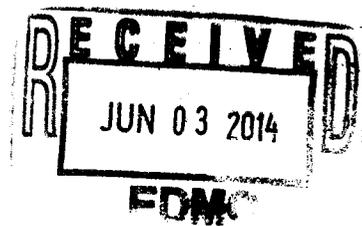
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 29, 2014

14-NWP-111

Mr. Matthew S. McCormick, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352



Dear Mr. McCormick:

Re: Non-Compliance with Permit Conditions for the 200 Area Evaporative Sewage Lagoon
(State Waste Discharge Permit ST0045514)

On May 14, 2014, the Department of Ecology (Ecology) met with the United States Department of Energy (USDOE) and their contractor, Mission Support Alliance (MSA) to discuss self-disclosure of permit non-compliances identified by MSA with the operation and maintenance of the 200 Area Evaporative Sewage Lagoon. MSA and USDOE requested the meeting with Ecology to present their internal assessment findings of ST0045514 permit requirements. This assessment, titled *Management Assessment of Regulatory Compliance for MSA Controlled Sewage Systems (MA-14-0018)*, was conducted by MSA staff at the 200 Area Evaporative Sewage Lagoon between March 24 and March 31, 2014.

The findings of the sewage lagoon assessment revealed the following non-compliances:

1. In accordance with Permit Condition S5.G.a. the Operations & Maintenance (O&M) Manual annual review letter is to be submitted to Ecology by September 1 of each year. The Permittee submitted this letter to Ecology on October 14, 2014; 44 days after the required due date.
2. The Permittee failed to institute an adequate O&M program per permit condition S5.B. (see tables on Pages 80–84 of the assessment report for a complete list of noncompliant items.)
3. A substantial portion of the O&M Manual and Permit is not being followed. MSA estimates that 56 percent of the O&M Manual requirements are not being met:
 - Failure to record some inspections and maintenance activities in the daily operations logbook (Permit Condition S5.G.a., and O&M Manual Section 6.0.)
 - Failure to follow the proper frequency for inspections and maintenance activities (Permit Condition S5.G.a., O&M Manual Section 6.0 and Table 6.1.)
 - Failure to enter the required operation and maintenance information into the facility's computerized maintenance management system (Permit Condition S5.G.a., and O&M Manual Section 6.1.1.)

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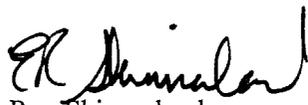
MSA provided Ecology with a copy of their internal assessment findings after this meeting. MSA stated that they are developing a formal root cause analysis report based on the deficiencies found. MSA also stated that the identified deficiencies are being addressed and they are currently implementing corrective action measures.

While Ecology appreciates MSA's self-disclosure, open discussion, and proactive approach to correct the non-compliance identified at the sewage lagoon, we expect the Permittee to comply with all of the conditions of their permit (ST0045514). We want to emphasize the importance of proper operation and maintenance for the 200 Area Evaporative Sewage Lagoon. The design of this facility's system makes it critical that the operation and maintenance of the facility is conducted properly at all times. Proper operation and maintenance is essential to maintain compliance with the permit.

Ecology requests a written report of all permit non-compliance according to Permit Condition S3.E.e. In addition, we also request a copy of the MSA final root cause analysis report. Both reports should be mailed to the address listed in permit condition S3.A.5. Compliance with these requirements does not relieve the Permittee from the responsibility to maintain continuous compliance with the terms and conditions of this permit or the resulting liability for failure to comply.

If you have any questions, please contact Stacy Nichols, Water Quality Coordinator at snic461@ecy.wa.gov or (509) 372-7917.

Sincerely,



Ron Skinnarland
Section Manager
Waste Management Section

cc:

Dale Jackson, USDOE-RL
Lori Fritz, MSA
Daniel Saucedo, MSA
Stacy Nichols, Ecology
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Steve Hudson, HAB
Ken Niles, ODOE
Administrative Record, Water Discharge Permit ST0045514
Environmental Portal
USDOE-RL Correspondence Control