



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

1240411

[0074895H]

16-ESQ-0134

SEP 26 2016

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

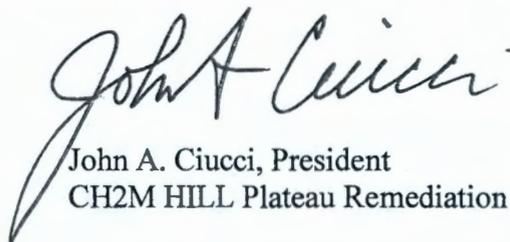
Dear Ms. Smith:

RESPONSE TO DANGEROUS WASTE COMPLIANCE INSPECTION ON MARCH 23, 2016, AT THE WASTE RECEIVING AND PROCESSING FACILITY, RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) SITE ID: WA7890008967, NUCLEAR WASTE PROGRAM COMPLIANCE INDEX NUMBER NO.: 16.556

This letter is in response to the July 25, 2016, (16-NWP-127) letter regarding the compliance inspection of the Waste Receiving and Processing Facility (WRAP) performed on March 23, 2016. Your letter was officially received on August 2, 2016. The U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) have reviewed the items identified as non-compliances with Dangerous Waste Regulations cited by the Washington State Department of Ecology (Ecology). Responses are provided in Enclosure 1, supporting documentation in Enclosures 2, and 3.

If you have any questions, please contact us, or your staff may contact Jeffrey A. Frey, Assistant Manager for Safety and Environment, on (509) 376-7727.

  
 Doug S. Shoop, Manager  
 Richland Operations Office

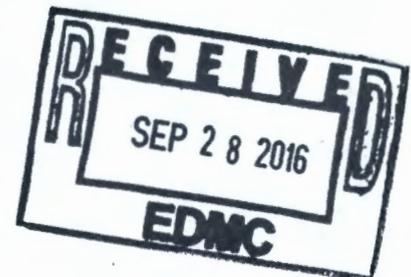
  
 John A. Ciucci, President  
 CH2M HILL Plateau Remediation Company

Enclosures:

1. Responses to Alleged Non-compliances in 16-NWP-127
2. Solid Waste Operations Complex (SWOC) Operations Timely Order
3. CHPRC Construction Completion for 2404-WB

ESQ:AKW

cc: See page 2



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Ms. Alexandra K. Smith  
16-ESQ-0134

-2-

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cc w/encls:

Dave B. Bartus, EPA

Jack L. Boller, EPA

Laura J. Cusack, CHPRC

Jerry W. Cammann, MSA

Dennis A Faulk, EPA

Moses N. Jaraysi, CHPRC

Stephanie K. Johansen, CHPRC

John B. Price, Ecology

Kevin Schanilec, EPA

Connie J. Simiele, CHPRC

Ron R. Skinnerland, Ecology

Joel F. Williams Jr, CHPRC

Administrative Record, TSD: TS-2-4 (Hardcopy)

Ecology NWP Library (Hardcopy)

Environmental Portal, G3-35

HF Operating Record (J. K. Perry, MSA A3-01)

cc w/o encls:

Gabriel Bohnee, Nez Perce

Russell Jim, YN

Rod Skeen, CTUIR

**Enclosure 1**  
**Responses to Alleged Non-Compliances in 16-NWP-127**

**Non-Compliance 1: No response required.**

**Non-Compliance 2 (as quoted from 16-NWP-127):**

Washington State Department of Ecology (Ecology) References:

Washington Administrative Code (WAC) 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A, Effect of Permit.

WAC 173-303-320(2)(d), as incorporated by WAC 173-303-400(3). The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken.

Observations:

“I reviewed inspection records for December 2015 through March 2016. I observed the following items on inspection records:

- RCRA Monthly Eyewash Inspection, dated December 1, 2015, failed to include the printed name of the inspector.
- RCRA Monthly Fire Extinguisher Inspection, dated December 1, 2015, failed to include the printed name of the inspector.
- RCRA Monthly Fire Suppression System Inspection, dated December 1, 2015, failed to include the printed name of the inspector.”

Action Required:

CH2M HILL Plateau Remediation Company (CHPRC) updated inspection processes on February 25, 2016, to include the printed name of the inspector on inspection logs. **No further action is required.**

The U.S. Department of Energy Richland Operations Office (RL) and CHPRC Response:

At the time of the inspections identified on December 1, 2015, the first two initials along with the last names were printed on the individual inspection records. This provides sufficient information to identify the specific individual performing the inspection. Subsequent to when those inspections were completed, RL and CHPRC have agreed to use the full printed name on future inspection records. Enclosure 2 contains a Solid Waste Operations Complex (SWOC) Operations Timely Order, dated July 21, 2016, which provides direction related to appropriate documentation of printed name and signature for environmental inspections.

Observations:

"I reviewed inspection records for December 2015 through March 2015. I observed the following item on inspection records.

- RCRA Quarterly First Aid Kit and CPR Kit Inventory, dated 3/23/2015, included a notation which states, "*Insp. Completed on 12/2/15; original missing, however date completion tracked in historical turnover. Tim Fulton 3-23-16.*"

Action Required:

CHPRC discovered the missing inspection log, and documented in the operating record that it was missing. **No further action is required.**

**Non-Compliance 3 (as quoted from 16-NWP-127):**

Ecology References:

WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A, Effect of Permit.

WAC 173-303-320(3), as incorporated by WAC 173-303-400(3). The owner or operator must remedy any problems revealed by the inspection, on a schedule which prevents hazards to the public health and environment. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

Observations:

During the Ecology inspection on March 23, 2016, "I observed stains on the floor within the 2404-WB Building, as seen in photo included on page 10 of this report. I observed that the floor was marked "roof leak" and had arrows pointing to two circles of staining. I observed that the 2404-WB Weekly Waste Storage Area Inspection log, dated December 7, 2015, includes an inspection finding notation which states, "WB - Inspection notices a few roof leaks, wet on floor. Down the middle." I observed that the 2404-WB Weekly Waste Storage Area Inspection log, dated December 7, 2015, included two corrective action notations which state, "WB - Inspection notices a few roof leaks, wet on floor. Down the middle. Updated historical turnover to note roof leak; also updated drawing to indicate leaks. Tim Fulton 12-8-15." I observed a written statement by CHPRC states, "at this time there are no scheduled roof repairs based on the results of the weekly inspections."

Action Required:

Within 60 days of receipt of this report, RL and CHPRC must submit to Ecology documentation that the roof leaks in 2404-WB have been repaired or placed on a schedule for remedy, which prevents hazards to the public health and environment.

RL and CHPRC Response:

The Ecology Observation stated the following: "I observed a written statement by CHPRC states, at this time there are no scheduled roof repairs based on the results of the weekly inspections." As a clarification, the statement is correct that roof repairs are not scheduled during the winter months (the time of this inspection); however, during the spring of 2016, CHPRC prepared a schedule for roof repairs to be performed in the summer months of 2016 for all of SWOC Buildings, including WRAP's 2404-WB. The 2404-WB roof repairs were completed and signed off on September 22, 2016. Enclosure 3 is a copy of the CHPRC Construction Completion Document—Repair 2404-WB Roof at WRAP, dated September 22, 2016.

**Non-Compliance 4 (as quoted from 16-NWP-127):**

Ecology Reference:

WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A, Effect of Permit. WAC 173-303-350(3), as incorporated by WAC 173-303-400(3). The contingency plan must contain the following: (e) A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up-to-date. In addition, the plan must include the location and the physical description of each item on the list, and a brief outline of its capabilities.

Observations:

"I observed that HNF-IP-0263-WRAP, Revision 21, Waste and Fuels Management Project Building Emergency Plan for WRAP, Section 9.0, Emergency Equipment, does not state where all emergency equipment is located."

Action Required:

RL and CHPRC submitted a Part B Application for all SWOC units, including WRAP, January 2016. This item has been referred to the Ecology Waste Management Project as part of the permitting process. **No further action is required.**

RL and CHPRC Response:

RL and CHPRC do not agree with the "Ecology Observation" as a "non-compliance."

**Non-Compliance 5 (as quoted from 16-NWP-127):**

Ecology References:

WAC 173-303-400(3), as referenced by the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion Revision 8C - Condition I.A, Effect of Permit.

WAC 173-303-350(3), as incorporated by WAC 173-303-400(3). The contingency plan must contain the following: (f) an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe the signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes.

Observation:

“I observed that HNF-IP-0263-WRAP, Section 7.1.1, Evacuation, does not describe the evacuation route and the alternate evacuation route, or include these routes on a map.”

Action Required:

RL and CHPRC submitted a Part B Application for all SWOC units, including WRAP, January 2016. This item has been referred to the Ecology Waste Management Project as part of the permitting process. **No further action is required.**

RL and CHPRC Response:

RL and CHPRC do not agree with the “Ecology Observation” as a “non-compliance.” Currently the Figure 1 in HNF-IP-0263-WRAP does show the evacuation routes to the primary and secondary staging areas. It is the discretion of the Building Emergency Director or Incident Commander to direct personnel to a number of alternate routes depending on the emergency.

July 21, 2016

To: SWOC Operations

From: James R. Brack, Director of Waste Disposition

Subject: Operations Timely Order *WD-16-001 Rev. 0*

**Effective Date:** July 25, 2016

**1. Order Subject:**

Appropriate Documentation of Printed Name and Signature for Environmental Documentation

**2. Timely Order Justification:**

Ecology has expressed concern that the full printed name on Environmental Inspections has not always met the requirements of WAC 173-303. A number of inspection records contain initials or partial initials for the "print" name section on the signature line. As these inspections become part of the facility's legal operating record, the documentation demonstrates that work has been performed as required. Appropriate printed names and signatures are part of demonstrating the completion of work.

CHPRC procedure PRC-PRO-EP-15333, *Environmental Protection Process* provides instruction to document the printed name and handwritten signature of the inspector. This timely order establishes the CHPRC expectations for documenting the full printed name and signatures on Environmental Inspections. These expectations will be applied to SWOC Environmental Inspections.

**3. Timely Order:**

Datasheets for Environmental Inspections contain a print/signature line for an inspector. The full printed name will consist of First and Last name. The signed name is your official signature, as signing any legal document. Supervisors are responsible for reviewing datasheets to ensure that the printed name and signature meet these expectations.

**4. Criteria for Cancellation:**

This Timely Order will be reviewed quarterly and remain active until this information has been incorporated into approved work documents or cancelled.

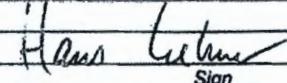
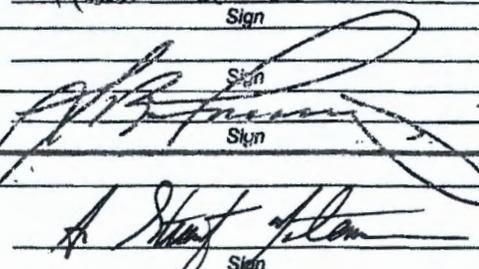
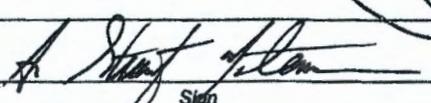
Approved by James R. Brack  
James R. Brack, Director of Waste Disposition

Date 7-21-16

Canceled by \_\_\_\_\_

Date \_\_\_\_\_

## CHPRC CONSTRUCTION COMPLETION DOCUMENT

<b>1. Project Title/Name:</b> Repair 2404-WB Roof at WRAP	<b>2. Work Package Document No.:</b> CS-16-03174 /K	
<b>3. Subcontractor/Contract Number:</b> Total Site Services / 36882-017	<b>4. Project Location:</b> 2404-WB / WRAP / 200W	
<b>5. Completion Type:</b> <input type="checkbox"/> Conditional Release/Partial Construction Complete <input checked="" type="checkbox"/> Complete Final/Full Construction Completion <input type="checkbox"/> Other:	<b>6. Turnover Responsible Parties:</b> <input type="checkbox"/> Contractor to CHPRC PTS <input type="checkbox"/> CHPRC PTS to CHPRC Project Startup <input checked="" type="checkbox"/> CHPRC PTS to CHPRC Facility/Owner <input type="checkbox"/> Other:	
<b>7a. Describe the Final or Partial completed scope of work:</b> Repair roof on building 2404-WB at WRAP Waste Storage Buildings to Meet RCRA Compliance. PTS Senior Management has completed field verification and documented via work package entry.		
<b>7b. Identify Work Scope Exceptions (punchlist items of exceptions):</b> <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span>		
<b>7c. Completion of Exceptions (Punchlist items of exceptions):</b> <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span>		
<b>8a. Acceptance Test Completion Description::</b> <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span> Acceptance testing activities/results:		
<b>8b. Identify Acceptance Test Completion Exceptions (Punchlist items of exceptions):</b> <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span>		
<b>8c. Completion of Acceptance Test Exceptions (Punchlist items):</b> <span style="float: right;"><input checked="" type="checkbox"/> Not Applicable</span> Completing of testing exceptions (punchlist items):		
<b>9a. Transfer from Construction</b>		
Hans Lukner Construction Manager	 _____ Print Sign	9/21/2016 _____ Date
Quality Assurance	_____ Print Sign	_____ Date
Jhivaun Freeman-Pollard PTS Project Director	 _____ Print Sign	9/21/2016 _____ Date
<b>9b. Acceptance by Facility / Operations</b>		<input type="checkbox"/> Not Applicable
A. Stuart Mortensen Facilities/Operations	 _____ Print Sign	9/22/16 _____ Date
		<input checked="" type="checkbox"/> Not Applicable
CHPRC Commissioning Manager/Site Water Purveyor	_____ Print Sign	_____ Date
		<input checked="" type="checkbox"/> Not Applicable
Other	_____ Print Sign	_____ Date