



1250453
[0064429H]

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

19-ESQ-0006

NOV 01 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:

MAJOR RISK LABELING OF CONTAINERS AT THE SOLID WASTE OPERATIONS COMPLEX (SWOC) IDENTIFIED FROM WASHINGTON STATE DEPARTMENT OF ECOLOGY (ECOLOGY) COMPLIANCE REPORTS

On September 13, 2018, the U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) met with your staff to begin discussions on major risk labeling of dangerous waste containers generated or stored by CHPRC. In numerous inspection reports, Ecology has taken exception to CHPRC's application of major risk labeling. The Enclosure identifies 22 containers cited by Ecology and lists the associated inspection report. As part of the ongoing effort to work collaboratively towards resolution, CHPRC will place additional major risk labels on the remaining containers identified in those reports. Subsequently, RL will provide Ecology with documentation that the containers have had the additional risk labels added, or manifest for the containers shipped offsite. RL and CHPRC maintain that these containers are currently labeled in accordance with the Washington Administrative Code and that the additional major risk labels are not an admission of non-compliance with past major risk marking practices.

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.

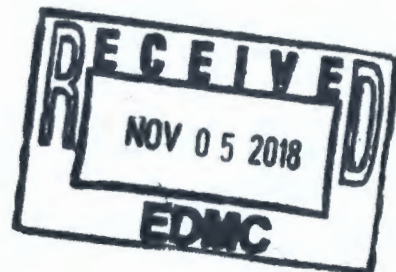
Sincerely,

Doug S. Shoop
Manager

ESQ:AKW

Enclosure:
List of SWOC Containers with
Major Risk Labeling

cc: See page 2



Ms. Alexandra K. Smith
19-ESQ-0006

-2-

NOV 01 2018

cc w/encl:

Jack L. Boller, EPA
Kathleen A. Conaway, Ecology
Noah S. Cruz, CHPRC
Laura J. Cusack, CHPRC
Jackson Davis, Ecology
Moses N. Jaraysi, CHPRC
Stephanie K. Johansen, CHPRC
Jared W. Mathey, Ecology
Linda C. Petersen, CHPRC
John B. Price, Ecology
Kalli Shupe, CHPRC
Connie J. Simiele, CHPRC
Ron R. Skinnerland, Ecology
Stephen A. Szendre, MSA
Administrative Record, H6-08: D-2-9,
TS-2-4, TS-2-7 (Hardcopy)
Ecology NWP Library (Hardcopy)
Environmental Portal, G3-35
HF Operating Record (J. K. Perry, MSA A3-01)

cc w/o encl:

Dave B. Bartus, EPA
Jack Bell, Nez Perce
Rex Buck, Jr., Wanapum
David R. Einan, EPA
Matt Johnson, CTUIR
Rose Longoria, YN
Kevin Schanilec, EPA

ENCLOSURE

List of Solid Waste Operations Complex Containers with Major Risk Labeling
Alleged Non-Compliances

Consisting of 2 pages (including this cover page.)

**List of Solid Waste Operations Complex Containers with Major Risk Labeling
Alleged Non-Compliances**

#	Location	Building	Container Number	Ecology Letter Number
1	Shipped Offsite March 17, 2018	N/A	0085591	18-NWP-018
2	Central Waste Complex (CWC)	2403-WB	3389-2-5	16-NWP-218
3	Shipped Offsite on February 16, 2017	N/A	Z7610-210	16-NWP-218
4	CWC	2403-WB	I-BOX-008	16-NWP-218
5	CWC	2403-WC	0082921	16-NWP-218
6	CWC	2403-WC	MW15800079	16-NWP-218
7	CWC	2403-WC	W15800072	16-NWP-218
8	CWC	FS-27	0090043	18-NWP-097
9	CWC	2403-WD	202A75013	18-NWP-097
10	Shipped Offsite on August 15, 2018	N/A	0081202	17-NWP-174
11	CWC	2402-WF	0074266	17-NWP-173
12	CWC	2402-WH	0353611-40	17-NWP-173
13	CWC	2403-WD	0049231	17-NWP-173
14	CWC	2403-WD	325-72-891S	17-NWP-173
15	CWC	2402-WJ	036493-3	17-NWP-173
16	CWC	2403-WD	0079513	17-NWP-173
17	CWC	2403-WD	MW17800002	17-NWP-173
18	CWC	2403-WD	MW17800004	17-NWP-173
19	Shipped Offsite on December 7, 2017	N/A	WH-76-630	17-NWP-173
20	WRAP	2404-WC	618A-16-0096	17-NWP-174
21	T PLANT	HS-032	0094716	18-NWP-129
22	T PLANT	HS-032	0047674	18-NWP-129