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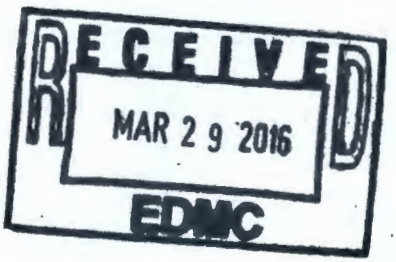
March 24, 2016

16-NWP-059

By certified mail



Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Response to Submittal of the Hanford Facility Noncompliance Report for Calendar Year (CY) 2015 (Permit Condition I.E.19)

Reference: Letter 16-ESQ-0044, dated February 26, 2016, from S. Charboneau, USDOE-RL to S. L. Dahl-Crumpler, Ecology, "Hanford Facility Noncompliance Report for Calendar Year (CY) 2015 (Permit Condition I.E.19)

1237440

Dear Ms. Charboneau:

The Department of Ecology (Ecology) received the U.S. Department of Energy – Richland Operations Office (USDOE-RL) February 26, 2016 report submittal and list of two noncompliances for CY 2015. USDOE-RL included the required information regarding these two reported noncompliances in the letter enclosure.

Upon review of the list of reported noncompliances, Ecology has determined that the list is incomplete and USDOE-RL has not met all of the reporting requirements with Permit Condition I.E.19, "Other Noncompliance." That condition from Revision Number 8C of the Permit states:

> The Permittees will report to Ecology all instances of noncompliance, not otherwise required to be reported elsewhere in the Permit, at the time the Annual Dangerous Waste Report is submitted.

Emphasis added. Your February 26 report failed to provide all reporting of noncompliance instances, as required by Permit Condition I.E.19. Attached to this letter is a list of instances of noncompliance Ecology found during its inspections for the calendar year of 2015. Please revise your February 26 report to include all these instances of noncompliance for CY 2015.

In the future, the Permittees will submit to Ecology yearly reports of all instances of noncompliance including those found and documented by Ecology, not otherwise required to be reported elsewhere in the Permit. Monitoring reports, compliance schedules, and immediate reporting would be excluded from the report.

Additionally, future reports and responses, submitted in accordance with Permit Condition I.E.19, are to be mailed to Suzanne Dahl and me.

Before Ecology can consider your compliance with Permit Condition I.E.19 on reporting all noncompliances, including what is identified in the enclosure, USDOE-RL needs to resubmit and include all instances of noncompliance required under Permit Condition I.E.19.

If you have any questions regarding this decision, please contact Kathy Conaway, Compliance, at kathy.conaway@ecy.wa.gov or (509) 372-7890.

Sincerely,

John B. Price

John B. Price
Tri-Party Agreement Section Manager
Nuclear Waste Program

kc/tkb
Enclosure

cc electronic w/enc:
Dave Bartus, EPA
Dennis Faulk, EPA
Mary Beth Burandt, USDOE-ORP
Lori Huffman, USDOE-ORP
Joe Sondag, USDOE-ORP
Bryan Trimberger, USDOE-ORP
Duane Carter, USDOE-RL
Cliff Clark, USDOE-RL
Tony McKarns, USDOE-RL
Alison Wright, USDOE-RL
John Level, AGO
Brad Erlandson, BNI
Roger Landon, BNI
Laura Cusack, CHPRC
Jon Perry, MSA
Mary Wilson, MSA
Harold Tilden, PNNL
Jeffrey Lerch, WCH
Jessica Joyner, WRPS
Ken Niles, ODOE
Shawna Berven, DOH
John Martell, DOH
Kathy Conaway, Ecology

cc electronic w/enc:
Suzanne Dahl, Ecology
Jared Mathey, Ecology
John Price, Ecology
Tom Tebb, Ecology
CHPRC Correspondence Control
MSA Correspondence Control
WRPS Correspondence Control
Environmental Portal
Hanford Facility Operating Record

cc w/enc:
Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Steve Hudson, HAB
Administrative Record
BNI Correspondence Control
PNNL Correspondence Control
WCH Correspondence Control
NWP Central File

cc w/o enc:
NWP Reader File

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
1	14.507	PNNL 300 Area (Generator)	WAC 173-303-180(1)	Manifest 007857355 FLE and 007857356 FLE (Dated August 10, 2014):Lists the generator's name and mailing address as "US DOE Hanford Site, US DOE Site PO Box 550 Richland, WA 99354" and the generators site address as "SAME." Manifest 009851955 JJK (Dated August 13, 2014): Lists the generators' s name and mailing address as "Battelle on behalf of the US DOE, PO Box 999 P7-28, Richland WA 99354-0999" and the generator's site address as "US DOE Hanford Site PO Box 550, Richland WA 99354."	2/19/2015
2	14.507	PNNL 300 Area (Generator)	WAC 173-303-200(1)(c)	In the 350D 90 Day Accumulation Area, one 35 gallon container (# 16786) had no accumulation start date and the black plastic bag container's(# 177103) date was obscured by a white label.	2/19/2015
3	14.507	PNNL 300 Area (Generator)	WAC 173-303-200(1)(d)	In room 405, building 325, I observed two containers in SAA number L1094 under Hood 3. The label on the smaller container to the left read Nitric Acid, acidic, and toxic. the label on the larger container to the right read Nitric Acid, acidic, and ignitable. The 11094 orange placard read acidic and toxic as a major risk. According to Mr. Grohs, the container on the left was for daily accumulation, which is transferred to the larger container on the right. The small container and the orange placard were missing ignitable as a major risk, while the large container was missing toxic as a major risk.	2/19/2015
4	14.507	PNNL 300 Area (Generator)	WAC 173-303-330(2)(b)	The training requirements for the building emergency director (BED) and building manager (assigned as BED) are not listed in the Environmental and Transportation Management and Operations Program (MOPs) Training Requirements or the MOPs Training Plan used by PNNL, eventhough they are identified in the emergency management plans. (DOE/RL-94-02 and PNNL-MA-110)	2/19/2015
5	14.507	PNNL 300 Area (Generator)	WAC 173-303-630(3)	Mr. Grohs identified that the October 24, 2014, weekly Dangerous Waste (DW) inspection log answered "Yes" to the item question, "Is accumulation date compliant?" The inspection log should have noted the obscured label and obscured accumulation date on container (# 177103). I confirmed the discrepancy when I reviewed the October 24, 2014, 90-Day Accumulation Area Weekly Inspection Log for 350D.	2/19/2015
6	14.507	PNNL 300 Area (Generator)	WAC 173-303-630(5)(a)	SAA 11156 had two containers in Hood 12. The stopper in the container on the left was not secured and closed.	2/19/2015
7	14.507	PNNL 300 Area (Generator)	WAC 173-303-200(1)(d)	I observed three containers labeled with a DOT Class 9 label. I observed no other risk labels on the three containers. I asked Mr. Grohs about the three containers with the DOT Class 9 labels. Mr. Grohs said the three containers on the two pallets were prepared for shipment. USDOE-RL addressed this concern documented in the inspection report and provided further information in letter 15-ESQ-0054, dated April 3, 2015. This response led to the disclosure that the generator continued to accumulate waste in container #16786. Container #16786 is one of the three containers I observed with a DOT Class 9 label. I documented in my inspection report that container #177103 was consolidated with container #16786.	2/19/2015
8	14.511	Trench 94	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400, WAC 173-303-330(2)	Trench 94 training plan, Table 3-1 – Job Titles/Positions at the LLBG, identifies job titles/positions for personnel that carry out job duties relating to the LLBG waste management duties. The list of job titles/positions fails to include personnel who: • Maintain environmental records (including, but not limited to, manifests, LDR records, and annual reports). • Maintain training records for the DW training plan. • Provide training required under the DW training plan. • Provide DW regulation interpretations, including environmental subject matter experts and levels of environmental management up through the overall Environmental Manager. • Develop and implement the waste minimization plan. • Are responsible for environmental notifications. • Perform any emergency response efforts required under WAC 173-303-360, Emergencies, including incident commanders and personnel who provide support of the BED's responsibilities under this section.	2/19/2015
9	14.511	Trench 94	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400, WAC 173-303-330(2)	In Table 4-1, Training Course Matrix, courses were assigned to the Job Titles/Positions from Table 3-1. The following records indicated expired training and training not completed, as compared to the assigned course listings in Table 4-1. • Course 035110, Container Waste Management Refresher, had expired on October 4, 2014 for James R. Lowery, NCO. • Course 300400, Waste Management - Exam, had expired on October 22, 2014 for Robert C. Olsen, NCO. • Course 300400, Waste Management - Exam, had expired on October 11, 2014 for Jeffrey A. Conley, 2-MGR/FWS – SWOC Ops. • Course 153022, Treatment, Storage and Disposal, does not list a date taken for Melvin E. Lakes, TSDR - SWOC. • Course 020159, Advanced Hazardous Waste Shipper Certification Training, or Course 020078, Advanced Mixed Waste Shipper Certification, were not completed for Melvin E. Lakes, TSDR – SWOC. • Course 153023, Waste & Transportation Services Verifier Qualification Card, was not completed for Melvin E. Lakes, TSDR – SWOC. • Course 153316, Waste Services Visual Verification Specialist Qual Card, was not completed for Melvin E. Lakes, TSDR – SWOC.	2/19/2015

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
10	14.511	**Trench 94**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400, WAC 173-303-350(4)(a)	Section 12.0, Plan Location and Amendments, of the BEP states that copies of this plan are maintained MO-720 Conference room and MO-438. Buildings MO-720 and MO-438 are located in the 200 West Area; it is approximately 7.5 miles (~20 minutes driving distance according to Google maps®) from either of these locations to Trench 94 in the 200 East Area. The contingency plan is not maintained at Trench 94.	2/19/2015
11	14.511	**Trench 94**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400, WAC 173-303-360(1)	Section 13.0, Facility/Building Emergency Response Organization, of the BEP identifies that the BED is located at MO-720 Complex. Building MO-720 is located in the 200 West Area. It is approximately 7.5 miles (~20 minutes driving distance according to Google maps®) from this location to Trench 94 in the 200 East Area. The BED is not located at or nearby Trench 94.	2/19/2015
12	14.512	**CWC - Spill Investigation**	Agreed Order and Stipulated Penalty (No.DE 10156) Exhibit A Subsection 1.2.6	According to Mr. Wayne Toebe, CHRPC's designated Single Point of Contact (SPOC), he contacted Ms. Deborah Singleton of the Washington State Department of Ecology, Nuclear Waste Program (by phone call) approximately at 4:30 p.m. on December 9, 2014, two and a half hours after the discovery of the unknown liquid. Mr. Toe be also said he made another phone call on December 10, 2014, to Mr. Jeff Lewis with Spill Response at the Ecology's Central Regional Office approximately at 10:00 a.m. or 11:00 a.m .. This is approximately 20 or 21 hours after the initial discovery of the liquid. CHPRC failed to immediately notify Ecology's Central Regional Office 24-hour emergency response center.	2/19/2015
13	14.512	**CWC - Spill Investigation**	WAC 173-303-070(3) and Agreed Order and Stipulated Penalty (No. DE 10156), Exhibit A Subsection 1.6.1	The Central Waste Complex (CWC) log book identifies the following: CHPRC Operations discovered an unknown liquid at 1:58 p.m. on December9 2014 at building 2403-WC. CHPRC Operations could not identify the source of the liquid at the time of discovery, but suspected a leak from the 85 gallon container# 9600342. Upon re-entry into2403-WC at 8:15p.m. on December 9, CHPRC conducted an industrial hygiene survey and radiological control survey on the liquid. The CWC logbook entry states "Radcon found no Alpha on there surveys and IH found liquid to have a pH of 6 to 7. and VOC's of .5 to 1.2." I did not observe documentation that CHPRC personnel opened the over pack container# 9600342 or confirmed that the inner container and its contents were not leaking into over pack container# 9600342. The Solid Waste Information and Tracking System (SWITS) R310 report, dated December 11, 2014 indicates that dangerous waste (DW) codes associated with container# 9600342 are D004-D011, D019, D030, and WSC2. During personnel interviews with CHPRC staff, Ecology was told that Mel Lakes, CHPRC Waste Management Representative (WMR) reviewed the survey results and the SWITS Report for container#9600342 and did not sample the unknown liquid. Ecology was also told by CHPRC staff that sufficient acceptable knowledge was available to designate the cleanup material as low level radioactive waste (LL W). The CHPRC personnel and the CWC logbook states that the LL W was put in aLL W roll-off container. Ecology asked for and received no designation documentation of the spilled material, pallet, and cleanup materials that CHPRC said were LLW. A United States Department of Energy (USDOE) response received by Ecology on January 6, 2015 now identifies the waste as Low Level Mixed Waste. With a Waste Designation Worksheet dated January 5, 2015. The Waste Designation Worksheet, for Designation # CWCRP 14009 states the following description: "The designation applies to drum 9600342, 0089101 and secondary waste from the cleanup and overpacking of drum# 9600342 ... " The entry date for this designation is January 5, 2015, and is signed by the designation specialist Mel Lakes on January 5, 2015. The designation document # CWCRP14009 lists applicable waste codes as D004-D011, D022, D030, FOOl, F002, F003 (State Only), and F005. ~26 days after our initial visit, the January 5, 2015 · designation documents were generated with not only the original SWITS R310 report waste codes ofD004-D011, D022, D030, but also the additional waste codes of FOOl, F002, F003 (State Only), and F005 on the designation document # CWCRP 14009. This January 5, 2015, designation appears to have required CHPRC to move the waste out ofthe LL W roll off container and into a container(# 0074107), to be managed as Mixed Waste.	2/19/2015
14	14.512	**CWC - Spill Investigation**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(3)	The Appendix A- Weekly CWC RCRA/Non-RCRA Inspection Checklists for 2403-WC, for the inspection conducted on December 9, 2014, marked "No" for Area Inspection, Item two. Item two identifies "Area is generally dry and free of accumulated water. There is no standing and/or unexpected water or snow accumulation in or around area?" The comments written by the inspector for Item two are as follows. Rain water puddles found in Q 1 and Q2, Liquid identified near drum# 9600342. Notified SDO. Verified Rain Water observed, wiped up rain water. 12/11/2014 Note: Inspection was initiated on 12/9/2014 Inspection was halted when liquid was found near drum # 9600342. Inspection was completed after Recovery Plan was initiated on swing shift 12/9/2014. Refer to FacilityLogbook 12/9/2014. 12/11/2014 Open Items codes noted on the inspection checklist are as follows. A description of the codes associated with the Open Items list was provided to Ecology on January 6, 2014. • R-13-002: Floor perimeter seam in the 2403WC building is separating in several locations and need to be resealed. • R-13-006: Scratches in floor ofthe 2403WC Building in Quadrant-I • NR-14-014: Floors need to be cleaned (i.e. swept) in all of 2400 series ewe building. Note: this is a non-RCRA open item. None of the open items or the notes for the "Rain water puddles found in Q 1 and Q2" document a remedy for the run-on liquid found or provides a schedule to repair the source of the run on liquid for building 2403-we. Mr. Mortensen explained before our walkthrough of 2403-we that roof repairs had been made to 2403-we earlier in the year. However, CWC personnel foundadditional problem spots where the roof was leaking. He said these roof leaks would be repaired after the Waste Receiving and Processing (WRAP) facility repairs are completed.	2/19/2015

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15	14.512	**CWC - Spill Investigation**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-360(2)(k)	The 15-Day Report addressing the December 9, 2014, discovery ofthe leak (15-AMRP-0044), which USDOE provided to Ecology on December 17,2014 is missing required information. The following information is missing from report 15-AMRP-0044. Name of the liquid (materials) involved; Estimated quantity and disposition of recovered material that resulted from the incident; and Cause of incident and the corrective action taken to prevent to reoccurrence of the incident.	2/19/2015
16	14.502	**B Plant**	WAC 173-303-070(3)	The S&M Plan, Appendix A inventory documents "hazardous materials," which are identified with material safety data sheets that still remain in tanks outside of the 221-B canyon. The tanks are on the north side of the canyon buildings. The row labeled "211-B Chemical Tank Farm System" describes the contents and volumes, which range from 122.5 pounds to2,250 pounds. According to the End Points Document, these tanks associated with 211-B are "Case 6, SystemAbandoned in Place." The chemicals contents remaining have been stored in these tanks from the beginning of the S&M phase, which began in 1999. I did not observe sufficient information regarding the hazardous characteristics of the remaining chemicals. The hazardous substances stored in the tanks associated with 211-B have not been used for their intended purpose for more than 15 years. The tanks continue to hold chemicals in possibly liquid or solid form that may designate as DW or MW. DOEand CHPRC state that the Tri-Parties agreed that the 211-B tanks and their remaining chemicals did not meet the criteria for the Part A Application and also stated that supporting documentation cannot be located. HNF-3208 identifies Cel12 in the 221-B canyon contains tank TK-2-1 with approximately 1,975 gallons (2,500 kilograms) ofDuolite ARC-359 "spent resin from T-18-2." The content in TK-2-1 is a spent resin, which could indicate that the tank is actively storing DW or MW.	3/12/2015
17	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-340(1)	According to HNF-IP-0263-CP S&M, Building Emergency Plan for Surveillance and Maintenance, the S&M personnel use portable emergency equipment on a vehicle at building M0-294. Mr. Corriel said the vehicle accompanies personnel when they visit a facility. I did not observe emergency equipment stored at the B Plant Complex or emergency equipment identified in the building emergency plan located at the B Plant Complex.	3/12/2015
18	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-350(2)	According to HNF-IP-0263-CP S&M, Building Emergency Plan for Surveillance and Maintenance, buildings and facilities covered by this BEP include the B Plant Complex, REDOX Complex, PURE X Complex, 224-B, 224-T, 24 2-B/BL, and less than 90-day accumulation area(s) managed by S&M personnel. This BEP is not specific to the B Plant Complex and includes multiple facilities.	3/12/2015
19	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-350(3)(f)	Evacuation or alternative evacuation routes for the B Plant Complex are not described in the HNF-IP-0263-CP S&M, Building Emergency Plan for Surveillance and Maintenance.	3/12/2015
20	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303--640(5)(d)	DOE and CHPRC has not provided documentation justifying that the five tanks (BCP, BCS, 221-BF-A, 221-BF-B, or ISO East) located outside ofthe 221-B canyon building cannot have signs to identify the waste contained in the tank. During the August 19, 2014 walkthrough of the B Plant Complex I observed the locked doors on the above ground structures (221-BB and 221-BF) were access points for below ground tanks BCP, BCS, 221-BF-A, and 221-BF-B. Also during the walkthrough I observed the above ground ISO-East tank is accessible through a locked gate on a chain link fence surround 276-BA. DOE and CHPRC have not provided documentation that demonstrates the five tanks located at 221-BB, 221-BF, and 276-BA are not accessible and not subject to WAC 173-303-640(5)(d) requirements.	3/12/2015

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
21	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR Part 265.112(a)	During the B-Plant Complex site inspection on August 19, 2014, DOE and CHPRC told Ecology they did not have a closure plan for the B Plant DWMUs. Additionally the closure plan was not provided to Ecology when I requested DOE and CHPRC to provide a closure plan for the DWMUs on September 19, 2014.	3/12/2015
22	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR Part 265.195(a), 265.195(b)(2), and 265.195(b)(3)	DOE and CHPRC have not demonstrated why tanks BCP, BCS, 221-BF-A, and 221-BF-B and ISO East are not accessible (according to Table 6-1 in the S&M Plan) and not subject to 40 CFR Part 265.195 requirements. DOE or CHPRC have not conducted inspections at least once each operating day for tanks BCP, BCS, 221-BF-A, 221-BF-B, and ISO East.	3/12/2015
23	14.502	**B Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-140	The 2009 and 2010 LDR Reports show the B Plant Complex Containment Building inventory as storing 294,000 kilograms of mixed waste. The 2011, 2012, and 2013 LDR Reports show the B Plant Complex Containment Building inventory as storing 0 kilograms of mixed waste.	3/12/2015
24	15.516	**207-A South Retention Basin**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(b)	TFC-OPS-WM-C-25, Rev A-2, Inactive Waste Site Surveillance Documentation, Record Generation, Changes, and Additions, fails to identify the types of problems to be looked for during inspection.	3/27/2015
25	15.516	**207-A South Retention Basin**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(d)	The inspection records for 2013, 2014, and 2015 did not include the time of the inspection. Additionally, no date and nature of any repairs or remedial actions taken were listed.	3/27/2015
26	15.516	**207-A South Retention Basin**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(3)	Inspection records for all three years noted the same problem of "Polyurethane Sealant Failing in multiple places in the west basin. Noted problems are not being resolved at the time of discovery or placed on a schedule in accordance with WAC 173-303-320(3). For the surveillance checklist of 1/15/2013, there is also a comment of a minimal amount of water in each Basin. The record does not indicate if this "water" was removed from each of the Basins or placed on a schedule to be removed.	3/27/2015
27	15..513	**T-Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-380(1)	Documentation provided for containers #0047674, #0077122, #0079701, #221 T-12-000004, and #221 T -96-000009 listed that a receipt date for storage at the facility was "N/ A" because the waste was generated at T Plant.	6/11/2015
28	15..513	**T-Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-380(3)(a)	Training records for the Environmental Manager and the CHPRC SPOC were requested during the January 22, 2015 inspection, and were not provided to Ecology when requested. CHPRC responded to the Ecology request by stating, Mr. Brian J. Dixon and Mr. Wayne Toebe is an employee of CH2M Hill Plateau Remediation Company. Mr. Dixon is the Decommissioning, Waste, Fuels, and Remediation Services Environmental Compliance and Records Director and Mr. Toebe is a Senior Regulatory Advisor. Their positions are not related to dangerous waste management duties at T Plant and are thus not included in the T Plant Dangerous Waste Training Plan. During the inspection Mr. Dixon stated that the training plan is two-phased; there is a Hanford site-wide training plan for all Hanford employees and a unit-specific training for T Plant employees. At a minimum, training for all employees must include familiarization with emergency equipment and emergency procedures. Records of required training must be maintained in accordance with WAC 173-303-330(3).	6/11/2015
29	15..513	**T-Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-320(2)(d)	DO-040-016, Revision 9, Perform Weekly and Daily Surveillance of WMA's states, weekly inspections are conducted at all T Plant WMAs and WAAs once each calendar week regardless of the activities being performed. No documentation of inspection for the week of 3/2/2014 through 3/8/2014 was included in the inspection records provided to Ecology.	6/11/2015
30	15..513	**T-Plant**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-320(2)(d) and Agreed Order Section 1.10.2.2	For the 214-T Building inspection performed on 10/7/2014, the inspector identified "crack in floor" with a listed disposition of "floors to be repainted after CWC." Weekly Appendix A data sheets through 11/12/2014 revealed the same notations. The weekly Appendix A data sheet for 11/20/2014 listed the condition of "Containment system are free of cracks, gaps, deterioration" as "SAT." The data sheet failed to include the date and nature of any repairs or remedial actions taken. The data sheet for the inspection during the week of 12/9/2014 listed the condition of "Containment system are free of cracks, gaps, deterioration" as "UNSAT." The problem is not noted on the following weekly inspection log. This data sheet did not include the date and nature of any repairs or remedial actions taken.	6/11/2015

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
31	15..513	T-Plant	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-330(2)	T Plant DW Training Plan, Table 3-1 – Job Titles/Positions at T Plant, identifies job titles/positions for personnel that carry out job duties relating to the T Plant waste management duties. The list of job titles/positions fails to include personnel (as defined in WAC 173-303-040) who: • Prepare and/or maintain records as required in WAC 173-303. • Provide training required under the DW training plan. • Provide DW regulation interpretations which affect DW management operations. • Are responsible for notifications as required in WAC 173-303. • Perform emergency response efforts required under WAC 173-303.	6/11/2015
32	15..513	T-Plant	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-630(3)	Containers #0077128 and #0079701 located in Building 214-T storage were labeled with the DOT Class 9 shipping labels. I observed no other risk labels on the two containers that indicated the major risk(s) associated with the waste.	6/11/2015
33	15.535	NRDWL	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)	The inspection records dated 1/6/2014,4/2/2014, 7/8/2014, 10/6/2014, and 1/6/2015 did not include the time of the inspection.	7/20/2015
34	15.520	WRAP	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-330(2) + WAC 173-303-040	WRAP Facility DW Training Plan, Table 3-1 -Job Titles/Positions at the WRAP, identifies job titles/positions for personnel that carry out job duties relating to the WRAP waste management duties. The list of job titles/positions fails to include personnel (as defined in WAC 173-303-040) who: • Prepare and/or maintain records as required in WAC 173-303. • Provide training required under the DW training plan. • Provide DW regulation interpretations which affect DW management operations. • Are responsible for notifications as required in WAC 173-303. • Perform emergency response efforts required under WAC 173-303.	8/6/2015
35	15.521 through 15.533	**15.521 - 300 Area Process Trenches** **15.522 - 216-A-29 Ditch** **15.523 - 216-A-36B Crib** **15.524 - 216-A-37-1 Crib** **15.525 - 216-B-63 Trench** **15.526 - 216-S-10 Pond & Ditch** **15.527 - 216-B-3 Main Pond** **15.528 - 1301-N** **15.529 - 183-H SEB** **15.530 - 1325-N** **15.531 - 1324-N&-NA** **15.532 - LLBG Used Trenches - Green Islands** **15.533 – NRDWL**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(d)	Due to the numbr of observations, see Inspection Report for Details. - Inspection logs were defcient in the date and time of the inspection, the printed name of the inspector, the handwritten signiture of the inspector, observations made, and the date and nature of repairs or remedial actions taken.	9/30/2015
36	15.533	NRDWL	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR 265.93(c)(2)	I observed in the 2014 groundwater monitoring records for NRDWL, that the average specific conductance exceeded the critical means value of 579 µS/cm on July 1, 2014, in Wells 699-25-34A, 699-25-34B, and 699-25-34D. From the 2014 groundwater monitoring records that I reviewed, I did not observe that Wells 699-25-34A, 699-25-34B, and 699-25-34D were resampled with samples split in two and analyzed to determine whether the significant difference was a result of laboratory error.	9/30/2015

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
37	15.522	**216-A-29 Ditch**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR 265.93(c)(2)	I observed in the 2014 groundwater monitoring records for 216-A-29 Ditch, that the average specific conductance exceeded the critical mean value of 396 µS/cm on the sampling dates of April 9, 2014, April 16, 2014, April 23, 2014, October 3, 2014, and October 23, 2014 in Wells 299-E25-32P, 299-E25-35 and 299-E25-48. I observed that the 2014 groundwater monitoring records did not show that additional ground-water samples from downgradient Wells 299-E25-32P, 299-E25-35 and 299-E25-48 were resampled with samples split in two and analyzed to determine whether the significant difference was a result of laboratory error.	9/30/2015
38	15.522	**216-A-29 Ditch**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR 265.92(d)(2)	I observed in the 2014 groundwater monitoring records for 216-A-29 Ditch, that Well 299-E26-12 was only sampled annually for specific conductance, pH, Total Organic Carbon, and Total Organic Halogen. I observed in 2014, Well 299-E25-34 was only sampled annually for Total Organic Carbon and Total Organic Halogen and did not have analysis for at least four replicate measurements for samples taken during the first sampling period for pH and specific conductance.	9/30/2015
39	15.524	**216-A-37-1 Crib**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR 265.92(d)(2)	After reviewing the 2014 groundwater monitoring records for 216-A-37-1 Crib, I observed on July 7, 2014, that groundwater Well 299-E25-47 was only sampled annually with four replicate measurements for pH, specific conductance, Total Organic Carbon, and Total Organic Halogen.	9/30/2015
40	15.526	**216-S-10 Pond and Ditch**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), 40 CFR 265.92(d)(2)	After reviewing the 2014 groundwater monitoring records for 216-S-10 Pond and Ditch, I observed on May 20, 2014, that groundwater Well 299-W26-14 was only sampled annually with four replicate measurements for pH, specific conductance, Total Organic Carbon, and Total Organic Halogen.	9/30/2015
41	15.541	**Trenches 31 and 34**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(d)	I observed that DW weekly inspections were not always performed weekly. I observed inspection records that did not include the printed name of the inspector. Also, I observed inspection records which did not include a notation of the observations made, or the date and nature of any repairs or remedial actions taken. A list of inspection record deficiencies is included as Attachment 1.	10/20/2015
42	15.541	**Trenches 31 and 34**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-330(2)	The LLBG Tr. 31/34 DW Training Plan, Table 3-1 -Job Titles/Positions at LLBG, identifies job titles/positions for personnel that carry out job duties relating to the Tr. 31/34 DW management duties. The list of job titles/positions fails to include personnel (as defined in WAC 173-303-040) who: • Prepare and/or maintain records as required in WAC 173-303. • Provide training required under the DW training plan. • Provide DW regulation interpretations that affect DW management operations. • Are responsible for notifications as required in WAC 173-303. • Perform emergency response efforts required in WAC 173-303.	10/20/2015
43	15.541	**Trenches 31 and 34**	WAC 173-303-395(6)	I observed the Trench 31 less-than-90 day accumulation tank labeling was not legible at a distance of 50 feet.	10/20/2015
44	15.518	**Single Shell Tank**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-310(2)(a)	During the field inspection, I observed there were no signs with the legend, "Danger-unauthorized personnel keep out," or equivalent legend written in English at the following tank farm locations. • East fence line of T Tank Farm • West fence line of T Tank Farm • North fence line of TY Tank Farm • North fence line of U Tank Farm • South fence line of U Tank Farm • South fence line of SX Tank Farm • East fence line of A Tank Farm • East fence line of AX Tank Farm	11/4/2015

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
45	15.518	**Single Shell Tank**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(d)	I observed inspection logs which did not contain the date of the inspection, the time of the inspection, the printed name of the inspector, the handwritten signature of the inspector, or the date and nature of any repairs or remedial actions taken. The deficiencies found during my inspection are identified on the inspection record deficiency table on the following page.	11/4/2015
46	15.518	**Single Shell Tank**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(3)	On the inactive waste site surveillance inspection records, I observed a failure to remedy problems revealed by inspections, on a schedule, which prevents hazards to the environment: • Inspection record dated 1/20/2014 of 241-BX-106, stated "Open electrical conduit lines may allow water into pits or other areas – Conduits that are no longer in use need to be capped. This has been noted on several past checklists." • Inspection record dated 3/7/2014 of 241-BY-109, stated "Pump pit is not foamed – Value handle penetration are allowing liquid intrusion. (This was reported last year)"	11/4/2015
47	15.518	**Single Shell Tank**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-330(2)	Dangerous Waste Training Plan TFC-PLN-07, Rev. B lists the following required training courses to be taken for personnel who perform Off-Site Shipping. • 020081 - VEHICLE INSPECTION FOR TRAFFIC PERSONNEL • 020380 - TRANSPORTATION SECURITY PLAN FOR SHIPPERS/WAREHOUSE - CBT • 050410 - LOAD SECUREMENT FOR DRIVERS AND TRAFFIC PERSONNEL • 351033 - OFF-SITE SHIPPER In a follow up inspection meeting on July 1, 2015, I asked if training course number 020380 Transportation Security Plan for Shippers/Warehouse had been assigned another course number, specifically number 351568. Ms. Allen said that the course changed to number 351568 around five years ago when WRPS assumed the operation contract from CH2M Hill Plateau Remediation Company. Course 351568 - WRPS Transportation Security Plan for Shippers does not appear as a required training course in Dangerous Waste Training Plan TFC-PLN-07, Rev. B, but it is required training for off-site shipping.	11/4/2015
48	15.536	**400 Area**	Permit Condition III.16.G.1 and WAC 173-303-350(3)(e)	The location of spill and emergency equipment is not specifically identified in the Permit, Part III, Operating Unit Group 16, Addendum J, Contingency Plan or the FFTF Building Emergency Plan, HNF-IP-0263. Under the Location column for Emergency Response Kit, both plans state the following: An emergency response kit is maintained at the facility. All personnel entering the noted areas, regardless of the type of work being performed, must be made aware of the emergency kit location prior to entering the areas. Under the Location column for Spill Kits and Spill Control Equipment, both plans state the following. One spill kit will be located at the 400 Area WMU and will be clearly identified. All personnel entering either the ISA or FSF will be made aware of the location of the spill kit.	11/10/2015

#	Inspection Number	Unit Group Name	Regulatory Citation	Violation Observation	Date Inspection Report Sent
49	15.536	**400 Area**	Permit Condition II.I.1 and II.O WAC 173-303-320(2)(d)	I reviewed the following inspection records associated with the 400 Area WMU. I observed numerous inspection logs with the printed initials of the inspector instead of the printed name of the inspector.I reviewed Data Sheet 1-Weekly Inspection Log for 400 Area Waste Management Units, between March 2, 2015 and June 29, 2015. My observations on inspection logs are noted below. • I observed the missing printed name of the inspector on one inspection log. • I observed the missing signature of the inspector on one inspection log. • I observed on the April6, 2015, inspection log for the ISA, the question "No accumulated liquids present?" was marked "No." However, the problem noted as a comment was "Leak on south end of containment (vent)." I did not observe on the inspection log the date and nature of any repairs or remedial actions taken. • I observed on the March 30, 2015, inspection log for the DWMU FSF that seven of the inspection log questions were not answered (by circling the Yes or No). The only question answered was for "Is inert gas pressure in feed line to CCP boxes (>2 inH20 <27 inH20) at the Dewar Pad," which was marked "Yes." I reviewed Data Sheet#: SM-20482, CP S&M Monthly/Annual Emergency Equipment Inspections, between January 2015 and June 2015, which include the following Appendixes. My observations on inspection logs are noted below. Appendix A - Emergency Equipment Inspection Checklist • I did not observe the time of the inspections on six monthly inspection records. I did not observe a space for the inspector to document the time of the inspection on the inspection log. Appendix C - Portable Fire Extinguisher Inspection • I did not observe the time of the inspections on the six monthly inspection records. I did not observe a space for the inspector to document the time of the inspection on the inspection log. • During my field inspection, I observed that the fire extinguisher next to the entrance of the DWMU FSF was a Class D fire extinguisher with a barcode number of"E04727." The Class D fire extinguisher and the barcode number "E04 727" were not on the Appendix C inspection records dated January 7th, February 5th, March 17th, April 20th, May 28th, and June 17th. Appendix F - WMU Spill Kit Inspection Checklist • I did not observe the time of the inspections on six monthly inspection records. I did not observe a space for the inspector to document the time of the inspection on the inspection log.	11/10/2015
50	15.536	**400 Area**	Permit Adendum I Inspection Plan and WAC 173-303-395	I reviewed the USDOE letter 14-AMRP-0309, dated October 23, 2014 and the attachment Apparent Cause Evaluation Report, Calendar Year 2013 Ignitable/Reactive Waste Inspection Did Not Include the D-10 Tank Outside Storage Area, CR-2014-0018, which was provided to Ecology. I observed under Section 3.4 Extent of Condition, the following: Assessment WFMP-2012-WSA-11735 identified that the 400 Area WMU inspection was missed in 2011. The issues related to missing Ignitable/Reactive waste inspection drove an apparent cause analysis to ensure that corrective actions had sufficient breadth and depth.	11/10/2015
51	15.539	**Hexone Storage and Treatment Facility**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(d)	The time ofthe annual facility inspections were not documented on the Data Sheet 1 for October 3, 2013 and November 12, 2014.	12/1/2015
52	15.539	**Hexone Storage and Treatment Facility**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-380(1)	The second page of Data Sheet 1 associated with the November 12, 2014 annual inspection was missing. The second page had the spaces for the printed name, signature, and date of the inspection.	12/1/2015
53	15.540	**241-CX Tank System**	WA7890008967 Revision 8C - Condition I.A, WAC 173-303-400(3), WAC 173-303-320(2)(d)	I observed on the Data Sheet 1 used for the July 9, 2014 inspection had initials "DS Old" rather than the full name of the inspector. The time of the annual inspections were not documented on the Data Sheet 1 for July 10, 2013 or July 9, 2014. I also did not observe the date and nature of any repairs or remedial actions taken on the Data Sheet 1 or Data Sheet 2 for the July 10, 2013, or July 9, 2014, annual inspections.	12/1/2015