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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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June 11, 2015

15-NWP-110

By certified mail

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

Mr. John A. Ciucci, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

Re: Dangerous Waste Compliance Inspection on January 22, 2015 at the T Plant Complex, Resource Conservation and Recovery Act (RCRA) Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No. 15.513

Dear Ms. Charboneau and Mr. Ciucci:

Thank you for your time during the inspection to determine compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 Washington Administrative Code). These regulations establish a system for safe and responsible management of dangerous waste.

The Department of Ecology's (Ecology) compliance report for the January 22, 2015 inspection of the T-Plant Complex is enclosed. This report cites violations in several areas that were not in compliance with the Dangerous Waste Regulations. These violations and the actions required for compliance are listed in the Compliance Problems section of the report.

To achieve compliance, complete the actions required and return the completed Compliance Certificate to Ecology within 60 days of receipt of the Report. Submit the Compliance Certificate, along with any requested documentation, to Nancy Ware at 3100 Port of Benton Boulevard, Richland, WA 99354.

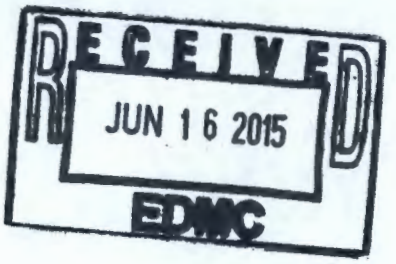
Failure to correct the deficiencies may result in an administrative order, a penalty, or both, as provided by the Hazardous Waste Management Act (Revised Code of Washington 70.105.080 and .095). Persons who fail to comply with any provision of this chapter are subject to penalties of up to $10,000 per day per violation.

If you have questions or need further information, please contact me at nancy.ware@ecy.wa.gov or (509) 372-7912.

Sincerely,

Nancy Ware

Nancy Ware
Dangerous Waste Compliance Inspector
Nuclear Waste Program



tkb
Enclosure

cc: See page 2

15-NWP-110
T Plant Complex
RCRA Site ID: WA7890008967
NWP Compliance Index No.: 15.513
Inspection Date: January 22, 2015

cc electronic w/enc:
Dave Bartus, EPA
Jack Boller, EPA
Dennis Faulk, EPA
Cliff Clark, USDOE
Michael Collins, USDOE
Joel Williams, Jr., CHPRC
Jon Perry, MSA
Ken Niles, ODOE
Debra Alexander, Ecology
Annette Carlson, Ecology
Kathy Conaway, Ecology
Kelly Elsethagen, Ecology
Edward Holbrook, Ecology
Mandy Jones, Ecology
Jared Mathey, Ecology
John Price, Ecology
Nancy Ware, Ecology
Environmental Portal
Hanford Facility Operating Record

cc w/enc:
Steve Hudson, HAB
Administrative Record
CHPRC Correspondence Control
NWP Central File
NWP Compliance Index File: 15.513

cc w/o enc:
Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell, Jim, YN
NWP Reader File

Washington Department of Ecology
Nuclear Waste Program
Compliance Report

Site:	**T Plant Complex** **RCRA Site ID: WA7890008967**
Inspection Date:	January 22, 2015
Site Contacts:	Joel Williams, Regulatory Inspection Lead, CH2MHILL Plateau Remediation Company (CHPRC)
Phone:	(509) 376-4782 FAX: N/A
Site Location:	200 West Area, Hanford Site Benton County, Washington
At This Site Since:	1945 NAICS#: 56221, 924110, 54171
Current Site Status:	Treatment, Storage, and Disposal Facility (TSDF)/Large Quantity Generator Operating Unit Group # 9

Ecology

Lead Contact: Nancy Ware Phone: (509) 372-7912 FAX: (509) 372-7971
Other Representatives: Edward Holbrook (Support Inspector)
Teresa Booth (Observer)
Report Date: June 11, 2015
Index: #15.513
Report By: Nancy Ware

Nancy Ware (Signed) 6/11/2015 (Date)

Site Location

The Hanford Site was assigned a single United States Environmental Protection Agency (EPA) identification number, and is considered a single Resource and Conservation Recovery Act of 1976, as amended (RCRA) facility even though the Hanford Site contains numerous processing areas spread over large geographic areas. The Hanford Site is a tract of land approximately 586 square miles and is located in Benton County, Washington. This site is divided into distinct Dangerous Waste Management Units (DWMUs) which are administratively organized into "unit groups." A unit group may contain only one DWMU or many; currently, there are 37 unit groups at the Hanford Site. Individual DWMUs utilize only a very small portion of the Hanford Site. Additional descriptive information on the individual DWMUs is contained in unit group permit applications and in Parts III, V, and VI of the Hanford Facility RCRA Permit, Dangerous Waste Portion, WA7890008967, Revision 8C (hereafter referred to as the Permit).

Owner/Operator

The United States Department of Energy – Richland Office (USDOE-RL) is the owner of the T Plant Complex (T Plant) and oversees waste management and cleanup activities ongoing on the Hanford Site. CHPRC is contracted by the USDOE-RL to operate the T Plant and corresponding DWMUs, including performing waste treatment, storage, and disposal (TSD) activities, conducting waste characterization, designation, and transportation services.

Facility Background

The 221-T building is a canyon facility that was built for chemical separation of plutonium from uranium and fission products contained in irradiated fuel elements. Construction began in 1943; and the plant operated as a facility for separation of plutonium from 1945 to 1956. In 1957, the T Plant was converted to a radiological decontamination facility. The T Plant includes multiple facilities, buildings, and storage areas used for treating and storing dangerous waste (DW) and radioactively contaminated DW (MW), listed in detail later in this description.

The T Plant has submitted a Part A permit application for DW and MW storage and treatment, and MW operations under interim status regulations, which began August 8, 1987. A RCRA Part B Application was submitted to Washington State Department of Ecology (Ecology) in 2002. T Plant is an active hazardous waste storage and treatment facility in support of Hanford Site cleanup and applicable milestones outlined in the Hanford Federal Facility Agreement and Consent Order (HFFACO), also known as the Tri-Party Agreement (TPA). Other permits for T Plant include AIR-07-306 (NOC Radioactive Air Permit); AIR-06-1013 (NOC Radioactive Air Permit; DE-01NWP-002R1 (NOC Non-Radioactive Air Permit); and HAN-099 (Onsite Sewage System Permit). Current authorized DWMUs where DW or MW is allowed to be stored and/or treated includes: 221-T Canyon Deck; 221-T Cells; 221-T Tank System; 221-T Railroad Tunnel; 221-T Head End; 2706-T Building; 2706-TA Building; 2706-TB Building; 214-T Building; and 221-TA Storage Area. In addition, USDOE-RL and CHPRC are seeking authorization for storage and/or treatment at the following DWMUs: 211-T Cage; 2706-T Asphalt Pad; 2706-T Storage Yard; HS-030 Storage Module; HS-032 Storage Module; 243-T Covered Storage Pad; and 221-T BY Storage Area.

The types of waste that T Plant can manage include DW, low level waste (LLW), mixed LLW (MLLW), transuranic waste (TRU), transuranic MW (TRUM), and Toxic Substance Control Act of 1976 (TSCA) polychlorinated biphenyls (PCB). T Plant capabilities provide capacity for treating and repackaging MLLW and TRUM, including waste sorting, processing, and volume reduction. T Plant has installed three Perma-Con units (portable modular containment systems which are attached to make a rigid enclosure) in the canyon in the 221-T building. Within these structures, personnel conduct repackaging and treatment activities on containerized waste from various Hanford DWMUs and waste being remediated from the low level burial grounds (LLBG) retrieval trenches.

The T Plant canyon has been used to open, inspect, segregate, and repackage MW. The 2706-T Building within T Plant has the capability to open, sample, sort, treat, and repackage boxes and drums of contact-handled MW. Some of the waste will be inspected in the 2706-T Building prior to off-site shipment for treatment at commercial treatment facilities. Also at the 2706-T Building, some treated waste will be inspected after return shipment from the off-site commercial treatment facilities.

Current T Plant projects and activities include: storage of MW containers (drums and boxes); repackaging of discrepant waste packages being prepared for Waste Isolation Pilot Plant certification; headspace drum sampling; venting of containers and installing NucFil® filters; identifying, verifying, sampling, treating, and repackaging of DW and MW; macro-encapsulation; and void filling.

Compliance Background for T Plant

July 11, 2000 – Ecology conducted a compliance evaluation inspection at T Plant. The Nuclear Waste Program (NWP) cited violations with designation, container labeling, general waste analysis, and container management of 26 drums of waste that had been stored onsite since the 1970s, and transferred to T Plant in 1998. The drums did not meet T Plant Waste Acceptance Criteria in that knowledge of the waste was unknown. The drums of contaminated soil remained undesignated, not properly labeled, and therefore, were managed in a non-compliant manner for two years or longer while being stored in a DWMU at T Plant. A Notice of Violation (NOV) from Ecology was sent to USDOE and Fluor Hanford, Inc. (FH) on October 11, 2000.

July 19, 2005 – Ecology conducted a compliance evaluation inspection at T Plant. The NWP cited concerns with designation, general waste analysis, and management of waste containers in storage at T Plant. Containers of waste were found to be undesignated, partially designated, and stored with significant deviations from the waste stream description. Ecology issued a letter of concern to USDOE-RL and FH on November 19, 2005, informing USDOE-RL and FH that insufficient knowledge of waste being stored could lead to violations.

June 26, 2007 – Ecology conducted a compliance evaluation inspection of T Plant. NWP cited one violation for incorrect designation and three concerns for waste accumulation, container labeling, and personnel training. Drums of waste had been stored without determining if the contents were hazardous waste, and incomplete or incorrect waste designations had been performed. A concern was cited for waste that was accumulated for extended periods of time without adequate or correct designation. The second concern was for container labeling. It appeared incomplete, and not reflecting the actual waste stored in the container. The final concern was training records that were not being kept for on-the-job training (OJT) listed as required in the DW training plan and interim status standards. Ecology issued a NOV to USDOE and FH on March 8, 2008.

September 22, 2010 – Ecology conducted a compliance evaluation inspection of T Plant, and referred the findings to Region 10 EPA in a referral letter May 22, 2013. The letter explained that because a compliance inspection performed by EPA's National Enforcement Investigations Center (NEIC) had recently been conducted and it was more comprehensive (including some scope overlap), Ecology determined that EPA could decide the outcome.

March 14, 2011 – the NEIC conducted a compliance evaluation inspection of the Hanford Solid Waste Operating Complex (SWOC), which included T Plant. The inspection findings led to a Consent Agreement and Final Order (CAFO) between USDOE-RL and EPA issued in 2011.

June 26, 2013 – EPA, Region 10 filed a CAFO to resolve violations of RCRA at the USDOE-RL facility in Hanford, Washington that were identified by NEIC during an inspection at SWOC in 2011. The CAFO resolves the following violations: 1) operating eight treatment, storage, and/or disposal (TSD) units at SWOC without authorization; 2) failure to have adequate closure plans for those units; 3) failure to close or obtain an extension to operate two inactive TSD units; and 4) failure to treat waste before placement inside of burial grounds inside SWOC as required by land disposal restriction requirements.

In the CAFO, USDOE-RL agreed to 1) submit closure plans for the eight units as permit modifications and to close those units according to the permit; 2) immediately comply with applicable final facility standards at these eight units; 3) submit closure plans or get authorization for the two inactive units; 4) cease treatment of waste within the lower level burial grounds; and 5) pay a penalty of $137,000. Violations at eleven other units have been referred to Ecology for follow-up.

October 22, 2014 – Ecology conducted a follow-up inspection to the EPA CAFO to focus on closing units and their closure plans and schedules. USDOE-RL agreed to close eight of the units per an EPA consent agreement and final order (CAFO). However, USDOE-RL indicated that the remaining 11 units were needed to meet clean-up milestones established through the Tri-Party Agreement, specifically M-91. The units at T Plant which USDOE-RL has agreed to close include: 271-T cage; 211-T pad; 221-T sand filter pad; 221-T R5 waste storage area; and 277-T outside storage area. T Plant units requested by USDOE-RL to remain open include: 243-T covered storage pad, 211-T cage, 2706-T yard, 2706-T pad, and 221-T bone yard.

Inspection Summary

Mr. Holbrook, Ms. Booth, and I arrived at T Plant at 9:00 a.m. on January 22, 2014. We met Brett Barnes, CHPRC Environmental Inspection Coordinator, at the 271T Building, where we signed in for access to the facility. He escorted us to the MO-892 Building for the inspection discussion. We were joined by the following individuals:

Tony McKarns, USDOE-RL, Environmental Compliance
Brian Dixon, CHPRC, Director of Environmental and Records
Paul Garello, CHPRC, Plant Manager
Dave Richards, CHPRC, T Plant Operations Manager
Kim Tarter, CHPRC, Records
Linda Petersen, CHPRC, Environmental Compliance Officer (ECO)

I identified myself as the lead Ecology DW compliance inspector, and asked if we could proceed around the room with introductions. After introductions, I provided a brief statement of my scope for the inspection. I explained that this was a planned annual compliance inspection as required for federal facilities in Washington. I said this inspection was to determine compliance with the Interim Status TSDF requirements under 40 CFR 265 and by reference and updated by Washington Administrative Code (WAC) 173-303-400, as well as other applicable sections of WAC 173-303 for DW management. I stated that I would be looking at storage and treatment of DW and MW in the TSDF. I said that I would like to start the inspection with some questions for the Operations Manager and follow that with a facility walk-down. I stated that I would like to conduct personnel interviews after lunch – personnel to be interviewed would be determined by conversations with the Operations Manager. After interviews, I would make document requests and perform document reviews for plans and records as time was available.

I began by asking Mr. Richards what were the current operations of the facility. He stated that T Plant is currently in a min-safe status. He said that under min-safe status, the facility personnel continued to perform operational maintenance; facility surveillances; manage waste in TSDF storage; and be ready to perform container venting operations. I asked if the facility is currently accepting DW or MW for

storage, and Mr. Richards responded that "yes, acceptance for DW or MW is ongoing." I inquired if any treatments were currently being performed at T Plant. Mr. Richards said that they perform solidification, absorption, and volume reduction. I then asked if the facility had any plans for future operations at T Plant. Mr. Richards explained that Ecology, EPA, and USDOE-RL are currently discussing the future receipt and storage of sludge waste from the K-Basin. He stated that the sludge waste does not have any RCRA DW constituents. The sludge is regulated under TSCA waste as it contains PCBs. I asked whether there have been any releases to the environment from DWMUs at T Plant. Mr. Dixon said that there have not. I asked if there is any ongoing groundwater monitoring for T Plant. Mr. Dixon stated that there is no ongoing groundwater monitoring. (NOTE: T Plant is a land-based unit, and no groundwater monitoring is required.)

Next, I requested a list of staff positions which support current MW activities. Mr. Richards said there were Radiological Control Technicians, Nuclear Chemical Operators (NCOs), Waste Services personnel, an ECO, Industrial Health (IH) Technicians, a Quality Assurance Officer, Engineering, Maintenance Personnel, Work Control Schedulers, and levels of Operations Management. He stated that the maintenance activities are the same as what is performed during normal operations. I asked what types of DW management units are active. Ms. Petersen and Mr. Richards collectively told me that 221-T Canyon comprises the containment building, the railroad tunnel, the canyon deck, the cells; and the 221-T Tank System. Ms. Petersen stated the tank system is non-operational, and there is a heel present in the tank. Mr. Richards said that the canyon is in lay-up mode; seals have been placed on the doors to prevent entry. He stated that the last entry into the canyon was on January 3, 2012.
Mr. Petersen and Mr. Richards stated that T Plant has a miscellaneous unit – 2706-T. They also stated that there is container storage in multiple DWMUs at T Plant, including 2706-TA and 214-T.
I requested a copy of the current container inventory. I also requested a list which would indicate where emergency equipment is stored at T Plant, including locations and descriptions.

I asked for the names of the individual staff designated for the specific positions or performed specific duties at the T Plant, and was provided with the following name:

- Emergency Coordinator (EC) – Mr. Richards
- Knowledgeable in DW management procedures who directs the training program –
  - Ms. Petersen is the technical authority for the DW training program.
  - Mr. Dixon is the functional manager.
  - Fallon Halloway is the training coordinator.
- Maintains records –
  - Ms. Tartar is the record keeper.
  - Ms. Johansen is the records manager.
  - Mr. Dixon is the functional manager.
- Provides the Land Disposal Restriction (LDR) information – Ms. Petersen
- Prepares manifests and other shipment documentation – Marshall Myrick, CHPRC Transportation Services Manager
- Performs waste acceptance determinations – Rick Austin, CHPRC Technical Services TSD Representative (TSDR)

After receiving the list of names, I asked what types of documents the facility includes in the operating record. I received answers from the staff present that manifests, inspection records, waste designations, sampling information, and the building emergency plan were among the operating record documents. I asked for an explanation of the process for adding records to the operating record. Mr. Dixon explained that at various stages in the process, the operating record may consist of paper copy records or electronic copy records, with an ultimate goal of scanning all records into the Integrated Data Management System (IDMS). The IDMS is a record database used at Hanford by all USDOE-RL contractors. I asked if the T Plant waste inventory information gets added into the operating record, and was told yes by Ms. Petersen. I asked if the information in the Solid Waste Information Tracking System is part of the operating record. Mr. Dixon stated that it was not. He and Ms. Tarter explained that paper-copy records for waste information in the form of package identification number (PIN) files are maintained until the information is scanned into IDMS. Mr. Richards and Ms. Tarter explained that log books are also part of the operating record. They stated that the logbooks are submitted to the Records group weekly to be scanned into IDMS. I asked if the training database is part of the operating record and asked for further information on the process for keeping training records. Mr. Dixon explained that their training program is two-phased; there is a Hanford site-wide training plan for all Hanford employees and a unit-specific training for T Plant employees. He stated that Ms. Halloway should be interviewed for information on training records and the training database. Before we began our facility walk-down, I requested interviews with Mr. Austin, Ms. Halloway, Mr. Myrick, and Ms. Petersen.

Facility Walkdown

Mr. Richards provided me with an inventory listing of DW and MW containers in storage at the T Plant. He took us first to 243-T, a covered outdoor asphalt pad. There was no waste present at the time of the inspection. He then showed us 2706-T outside storage area, an uncovered outdoor cement pad. I observed there was no waste present at the time of the inspection. We moved to the 2706-TA outside storage area, an uncovered asphalt area. I observed that no waste was present at the time of the inspection.

Photo #DSC00443, 243-T Pad

Photo #DSC00444, 2706-T Outside Storage Area

Next we went to 2706-T Yard, an asphalted area with two connex storage units – HS-032 and HS-030. Mr. Richards stated that HS-030 is used for product storage. He opened HS-032 where I observed an

85-gallon metal drum labeled as DW and Corrosive. I observed a radioactive label on the drum and an identification label for container ID #0047674.

Photo #DSC00445, Container #00476874, inside HS-032, located at the 2706 TA Yard Storage Area

We moved to the 2706-T Asphalt Pad, an outdoor asphalt pad, where I observed a large concrete box labeled as DW and PCB waste, with an out-of-service date of 7/11/2005. I observed a radioactive label on the container and an identification label for container ID #0022097. Mr. Richards showed us the 221-T Railroad Tunnel outside storage area, an asphalted outdoor storage area. I observed there was no waste present in this area at the time of inspection.

Photo #DSC00446, Container #0022097 located at the 2706-T Asphalt Pad

Photo #DSC00447, 2706-T Asphalt Pad

Photo #DSC00448, 221-T Railroad Outside Storage Area

Mr. Richards escorted us to 2706-TA, which he also referred to as TA Bay or TA Bldg. He stated that this is an indoor storage area, and that container venting is performed within the building. I observed an 85-gallon metal drum labeled as DW. I observed a radioactive label on the drum and an identification label for container ID #0089073. I observed a second 85-gallon metal drum labeled as DW and corrosive. I observed a radioactive label on the drum and an identification label for container ID #0089072. I observed a 10-gallon metal drum labeled as DW and flammable gas. I observed a radioactive label on the drum and an identification label for container ID #0056912.

Photo #DSC00449, Container #0089073 in 2706-TA Bay

Photo #DSC00450, Container #0089072 in 2706-TA Bay

Photo #DSC00451, Container #0056912 in 2706-TA Bay

We went next to the 214-T Building, indoor container storage. I observed a 10-gallon metal drum labeled as DW and corrosive, and an identification label for container ID #0077122. I observed a

30-gallon metal drum labeled as DW and an identification label for container ID #0079701. I observed another label that identified the container as an "accumulation area for fuses and capacitors," and a Department of Transportation (DOT) Class 9 shipping label. I said that it is allowable to put the DOT Class 9 shipping label on the container while in storage. However, I stated that the major risk(s) associated with the waste must also be marked on the container. Mr. Dixon stated that this topic had come up before, and both verbal and written agreements had been made by Ecology that only the DOT Class 9 label was necessary. He said that Paul Martin (CHPRC Environmental) had discussed this topic with Tom Cusack (Ecology Headquarters Office), and also that he had received agreement in an email from Jeff Ayres (Ecology NWP Office). I asked Mr. Dixon to provide documentation of Ecology's agreement to this statement.

NOTE: I was supplied with documents which discussed using the DOT labeling. However, no written documentation that an agreement relating to DOT Class 9 labels for storage and/or accumulation was provided. I also reviewed Ecology Publication 12-04-016, *Risk Labels Required for Dangerous Waste Containers*, written by Tom Cusack. On page 2 of this publication, a section entitled, *Unacceptable risk labeling systems*, states, *the U.S. DOT has a "Class 9" risk label for shipping purposes. This label would not adequately identify risk(s) associated with the waste inside the container and should not be used.*

I observed a 10-gallon metal drum labeled as DW and an identification label for container #0077128. I also observed a radioactive label on this drum and a DOT Class 9 shipping label. I observed the drum was not labeled with the major risk(s) associated with the waste. While in this building I checked a safety shower to ensure it was being inspected monthly. Mr. Richards explained to me that the safety showers and eyewashes have been deactivated in specific buildings in T Plant, including 214-T. He said that the facility has portable units available when personnel are working in buildings with deactivated safety showers and eyewashes. Mr. Richards stated that the Canyon (221-T) fire extinguishers are expired and will need to be replaced upon re-entry into the canyon. He added that there is currently no manned entry into 221-T; and no RCRA waste is being stored in the railroad tunnel or on deck.

Photo #DSC00452, Container #0077122 in 214-T Building

Photo #DSC00453, Container #0079701 in 214-T Building

Photo #DSC00454, Container #0077130 in 214-T Building

Photo #DSC00455, Container #0077128 in 214-T Building

Photo #DSC00456, Container #0077128 in 214-T Building

We went to the 211-T Cage next, a gated, outdoor concrete area with epoxy covered floors and a collection system. I observed no waste was present at the time of the inspection. We walked to the 221-T BY, an uncovered outdoor storage asphalt pad. I observed no DW was present at the time of the inspection. We continued the facility walk-down on the backside (east) of T Plant. I observed no DW present at the time of inspection.

Photo #DSC00457, 211-T Cage

We agreed that interviews would take place after lunch, and that the interview location would be at the Central Waste Complex (CWC) office building MO-720.

Personnel Interviews

Before we left T Plant, I asked Mr. Richards a series of questions in reference to operating processes; performance of inspections; and emergency response. I asked him what major hazards are present at T Plant. He answered that the major hazard is radiological materials. I asked what types of events have facility emergency response personnel responded to in the last three years. He stated that there have been no emergency responses during this time frame; the closest event was a power loss which triggered a fan to turn off two years ago. Mr. Richards said that the facility operations processes worked as they should have at the time, and no emergency response was necessary. I asked if the facility's contingency plan had ever failed in an emergency. He said no. I asked how the EC would be notified of an event at the facility. He stated that the employee who discovered the situation would call the shift office; and the shift office would notify the building emergency director (BED). The BED is synonymous with the EC. I asked what actions would be required if an event occurred that posed an actual or imminent threat to human health or the environment. Mr. Richards stated that the response actions would include the following, occurring in this order: SWIM – stop, warn, isolate, minimize; internal notifications; staff the incident command post; review the emergency action levels; plan for re-entry and recovery; re-entry; rad surveys; IH surveys; down-post; and implement recovery. I asked what documents, procedures, or systems are implemented in the event of an emergency. Mr. Richards said that in the event of an emergency, the facility emergency response would follow the building emergency plan; the Hanford Emergency Management Plan – which includes the USDOE-RL Emergency Procedures; and internal facility procedures. I asked who decides if off-site notification for emergency response is required. He stated that is determined by the Emergency Operations Center personnel. I asked who is responsible for making notifications to Ecology in the event T Plant had an emergency, a spill, or a discharge. Mr. Richards told me that the ECO would be provided information from the incident commander (IC); and then consult with the Single Point of Contact (SPOC) to determine if notification to Ecology is necessary. He said that if notification is determined to be necessary, the SPOC would notify Ecology.

I asked Mr. Richards to provide a schedule for T Plant general facility inspections. He stated they would provide the following documents which outline types of inspections, criteria for inspections, the list of

DWMUs inspected, and the schedules for inspections. The inspection schedules are located in TPLN-PRO-OP-51748, DO-040-016, Revision 9, *Perform Weekly and Daily Surveillance of WMA's*; TPLN-PRO-EP-51745, DO-040-004, Revision 8, *Perform Surveillance of T Plant Emergency Equipment*; TPLN-PRO-OP-51744, DO-040-001, Rev. 14, *Perform Daily Surveillance for T Plant Complex* and TPLN-PRO-OP-51749, DO-040-020, Revision 25, *Perform Daily Surveillance of 2706-T.* I asked who performs the inspections, and Mr. Richards answered that NCOs perform the inspections. I asked Mr. Richards for a description of the process for dealing with unsatisfactory findings, and if there is a schedule for remedy of problems found during inspections. Mr. Richards stated that the NCO would first make a notation of the problem on the inspection record. He said that if the NCO could correct the problem at the time of discovery, the NCO would do so. Mr. Richards added that if it was not possible to correct at that time, the NCO would notify the supervisor of the problems found. He said that the supervisor would add the correction of the deficiency to the work planning schedule. Mr. Richards clarified that correction of deficiencies may not be put on the schedule immediately. I asked if inspections are being performed for the tanks and tank systems within T Plant. Mr. Richards said that the NCOs perform daily inspections, including weekends, on the systems in accordance with their procedure, DO-040-001. He stated the inspections include taking readings on tank levels and testing leak detection alarms. (See inspection procedure reviews on page 16.)

I asked Mr. Richards if an integrity assessment had ever been performed on the tank systems by an independent, qualified, registered professional engineer (IQRPE). He stated that he would like the T Plant Engineering to answer these questions. Mr. Chase, CHPRC T Plant Engineering Manager, joined the interview. I asked him if IQRPE integrity assessments had ever been performed on the tank systems. Mr. Chase told me that MW had first entered the 221-T tank system around 1944, in tanks 6-1, 5-7, 11-R, and 15-1. He stated that the last waste had been added around 2000. Mr. Chase said that IQRPE integrity assessments had never been performed on the tanks. I asked if an IQRPE integrity assessment had been performed on the containment building. Mr. Chase stated that such an assessment had been performed around the 2002-2003 time-frame, and that he would provide me a copy of the assessment. (See inspection procedure review on page 16.)

We traveled to the CWC and continued with interviews. Mr. Williams joined us at the MO-720 building conference room, and our inspection continued with questions for Mr. Myrick, CHPRC Manager of Waste Transportation Services, on manifest and shipment topics. I asked Mr. Myrick to describe the manifest process for wastes being sent from T Plant. Mr. Myrick stated that the process begins when his group of shippers receive information on DW or MW containers from Waste Services TSDRs. He said the shippers review the TSDR information to determine a DOT classification for the waste package and the proper shipping name, and review the packaging described in the TSDR information to determine it is appropriate for shipping. Mr. Myrick said the shipper then fills out the required information on the manifest and form NRC 540/541.

I asked what facilities T Plant sends their DW or MW to, and what shipping documentation is required for those facilities. Mr. Myrick stated that his shippers do not determine where the waste is shipped to. He said the TSDR chooses the destination facility and requests permission from that facility to accept the waste in advance of shipment. Once permission is received, Waste Transportation Services prepares the manifest and gives T Plant operations direction for the shipment. Mr. Myrick stated that DW is sent to Philips Services Corporation (PSC) and Clean Harbors; and MW is sent to PermaFix Northwest

(PFNW). Mr. Holbrook asked what transporters are used. Mr. Myrick answered that Savage Logistics, LLC, and Cast Transportation have been used for transport. He also stated that PSC provides a pick-up service for DW. I asked how many waste shipments were manifested from T Plant in 2013 and 2014. Mr. Myrick estimated that ~8 shipments had been shipped from of T Plant. He stated he would have to check the records, but he thought all shipments had gone to PFNW. I asked if there had been a need to file any exception reports within the last five years, and Mr. Myrick answered no.

Mr. Myrick left, and Mr. Austin and Mike Waters, CHPRC Waste Management Services Manager, joined us to answer questions about T Plant waste acceptance. I asked Mr. Austin to provide the document name and revision number for the facility's waste acceptance plan. He stated the facility is currently using HNF-9921, Revision 6, *T Plant Complex Waste Analysis Plan.* I asked for names of facilities on-site and off-site that T Plant currently accepts waste from. Mr. Austin said they are currently only accepting waste from CWC. I asked Mr. Austin how many profiles are currently in place for incoming waste streams to T Plant. Mr. Austin explained that there are ~50 SWOC profiles in place; however, even though the SWOC profiles include T Plant as an acceptable unit, a waste package would still need to be evaluated before being accepted into the T Plant facility. [See page 15 for Waste Analysis Plan (WAP) review.]

I asked Mr. Austin to describe the process of determining that waste is acceptable for storage and/or treatment at T Plant. He referred me to HNF-EP-0063, Revision 16, *Hanford Site Solid Waste Acceptance Criteria*, which provides information to generators of what is required for acceptance at the SWOC facilities. This document, as well as other acceptance information, is available at http://www.hanford.gov/page.cfm/SolidWasteAcceptanceProgram. He stated that the first step is for the generator to develop a profile of the waste stream to provide the TSDR with information; the profile is reviewed and approved by the TSDR. He further stated that generators also need approval for each shipment of waste to T Plant. I asked Mr. Austin to explain what information is included in the generator's profile. He said that it includes a physical description of the waste, chemical and radiological characterization, modeling, process knowledge, federal and state waste codes associated with the waste, container and packaging information, and any supporting documentation. I asked how the determination is made for which DWMU a waste package will be stored at T Plant. Mr. Austin stated that this determination process is outlined in the T Plant WAP.

After Mr. Austin and Mr. Waters left; Ms. Halloway joined us for questions on the DW training plan records. I asked what document(s) make up T Plant DW training plan, and what revision of these documents was the facility working to. She said the facility is working to PRC-STD-TQ-40228, Revision 0, *T Plant Dangerous Waste Training Plan.* I asked Ms. Halloway how training records are produced and maintained at the facility. She stated that training completion records and class rosters are sent to the Hammer Training Records group, which is part of the Mission Support Alliance. She explained that training records are kept both as hard copy documents and as electronic records. Ms. Halloway said that the ITEM (Integrated Training Electronic Matrix) database and the Enterprise Learning Management (ELM) tool are used for storing and retrieving training information; and that T-Plant training records are also stored in IDMS. She explained that the ELM tool is also used by the course schedulers at Hammer, and the ITEM Web Portal is used to pull training completion dates and other training information. She stated that we would need to contact the Hammer Training Records group to get more detailed information on how they store and retrieve information.

Ms. Halloway left, and I asked Ms. Petersen to describe the process for gathering and reporting T Plant LDR information in the annual Hanford LDR report. Ms. Petersen stated that she could not answer how this information was prepared in the past. She said that she used a calculation and had documentation for the current information that she was providing for 2014. I asked her to explain what is meant by comments in the prior years' LDR reports regarding T Plant Canyon disposition as this is an operating unit and there are no milestones for canyon disposition. Mr. Williams stated that there is an agreement between Ecology and USDOE-RL for T Plant Canyon disposition. I requested a copy of this agreement.

NOTE: I received documentation of discussions between USDOE-RL, EPA, and Ecology on how to address closure of the T Plant canyon through permitting. The documents did not include any discussion of a milestone delay of closure for the T Plant canyon. I did not review closure plans for any units at T Plant as part of this inspection. This topic is addressed in the inspection for all SWOC units referred to Ecology by EPA.

Document Review

My document review began with the PRC-STD-TQ-40228, Revision 0, *T Plant Dangerous Waste Training Plan.* WAC 173-303-330(1), Personnel Training, states that the facility owner or operator must provide a program of classroom instruction or OJT for facility personnel. WAC 173-303-040 defines "personnel or facility personnel" as *all persons who work at, or oversee the operations of, a hazardous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of WAC 173-303-400 or 173-303-280 through 173-303-395 and 173-303-600 through 173-303-695.* I observed that Table 3-1 – *Job titles/positions at T Plant,* in PRC-STD-TQ-40228, 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 does not include personnel who perform the following DW tasks:

- 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 any emergency response efforts required under WAC 173-303.

In addition, WAC 173-303-330(2) states that *the owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records: (a) for each position related to dangerous waste management at the facility, the job title, the job description and the name of the employee filling each job. The job description must include the requisite skills, education, other qualification, and duties for each position; and (b) a written description of the type and amount of both introductory and continuing training required for each position.* Section 3.0, Names, Job Descriptions, and Job Title/Positions, of the DW training plan, states that this information can be provided upon request. Information regarding requisite skills, education, other qualifications, and duties for each position was not provided to Ecology upon request of the facility's DW training plan.

Therefore, I could not determine that the information was or was not complete and in accordance with WAC 173-303-330(2) training plan requirements.

I had requested training records for the T Plant BED, the ECO, three (3) NCOs, the Environmental Manager (Brian Dixon), a shipper, the T Plant Operations Supervisor, a TSDR/Waste Acceptance person, and the CHPRC SPOC (Wayne Toebe). CHPRC submitted to me the following training records for review:

- T Plant Building Emergency Director and T Plant Operations Supervisor - David E. Richards.
- NCOs – Ronald R. Everham, Laura A. Johnson, and Ismael Zavala.
- ECO – Linda C. Petersen.
- CHPRC Transportation Services Shipper - Marshall L. Myrick.
- CHPRC TSDR/Verifier/Waste Management Representative for SWOC– Richard L. Austin.

I observed no problems with the individual training records that I received and reviewed.

Training records for the Environmental Manager and the CHPRC SPOC were not provided upon request. CHPRC responded to Ecology 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 Waste4 Training Plan.* Mr. Dixon stated during the inspection 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).

T Plant provided one profile for incoming waste streams; upon my review the document appeared to be in compliance with the T Plant WAP, and I observed no problems. I reviewed manifests and associated LDR documentation for shipments, and observed no problems with these documents.

I reviewed HNF-9921, Revision 6, *T Plant Complex Waste Analysis Plan.* Section 2.5, *Discrepant Container Management*, states that the following are discrepant issues and will be tracked in the Discrepant Container Management Program until the issues are resolved. Included in the list of issues are: indications of bulging, containers with unknown contents, containers holding waste prohibited under Section 1.2, containers no longer in good condition and not in compliance with 40 CFR 265.171, inconsistent inventory between container contents and the record, and unexpected liquids are found. WAC 173-303-630(2) states, *if a container holding dangerous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the dangerous waste from the container to a container that is in good condition or manage the waste in some other way that complies with the requirements of chapter 173-303 WAC.* The requirement of this section is to move the DW to a compliant container if a container is not in good condition or manage the waste in some other compliant manner. Placing containers of DW into a program indefinitely without a near-term schedule for correcting the problem does not resolve the non-compliance. The facility WAP should not direct the facility to be out of compliance with the requirements of WAC 173-303-630(2).

Section 2.4, *T Plant Generated Waste*, states, *waste generated by T Plant is considered accepted at T Plant when the waste is generated.* WAC 173-303-380(1)(a) requires facilities to maintain a description of and the quantity of each DW received or managed on-site, and the method(s) and date(s) of its treatment, storage, or disposal at the facility. Because the DW and MW generated at T Plant are considered accepted at T Plant when generated, the required information listed above, including the date(s) of storage, for this waste should also be included in the operating record. Documentation provided for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009 listed that a receipt date for storage at the facility was "N/A" because the waste was generated at T Plant.

Another document which I reviewed was the HNF-19668, Rev. 5, *T Plant Complex, 221-T Building Dangerous Waste Containment Building Certification*, prepared in March, 2005 by David S. Messinger, P.E., Fluor Federal Services. I found no problems during my review of this document.

I reviewed the TPLN-PRO-OP-51744, DO-040-001, Rev. 14, *Perform Daily Surveillance for T Plant Complex* and TPLN-PRO-OP-51749, DO-040-020, Revision 25, *Perform Daily Surveillance of 2706-T*, with corresponding inspection records. I observed no problems with the inspection documentation. During my review of TPLN-PRO-EP-51745, DO-040-004, Revision 8, *Perform Surveillance of T Plant Emergency Equipment* and inspection record of emergency equipment, I also observed no problems with the inspection documentation.

Lastly, I reviewed TPLN-PRO-OP-51748, DO-040-016, Revision 9, *Perform Weekly and Daily Surveillance of WMA's* and associated inspection records. Section 1.1 states, *daily inspections are conducted at all T Plant Waste Management Areas (WMAs) [also known as Dangerous Waste Management Units (DWMU)] and Waste Accumulation Areas (WAAs) and shall be performed on a daily basis during normal working hours. Inspections will not be performed on facility closure days. The daily inspection fulfills the requirements listed in WAC 173-303-320(2)(d) and TSR - SAC 5.6.4.* It is unclear what is meant by Waste Accumulation Areas (WAAs) in a TSDF. WAC 173-303-040 defines "storage" as *the holding of dangerous waste for a temporary period* and states that *accumulation of dangerous waste, by the generator on the site of generation, is not storage as long as the generator complies with the applicable requirements of WAC 173-303-200 and 173-303-201.*" If DW or MW is considered accepted into the TSD storage as stated in Section 2.4 of the WAP upon generation, it should be managed under the storage requirements listed in WAC 173-303-280 through -395 and any other requirements listed by reference in these sections. Accumulation of DW or MW should follow the applicable requirements of WAC 173-303-200 and WAC 173-303-201.

Section 1.1, DO-040-016 also states, *weekly inspections are conducted at all T Plant WMAs and WAAs once each calendar week regardless of the activities being performed.* I observed that the documentation of inspection for the week of 3/2/2014 through 3/8/2014 was not included in the inspection records provided to Ecology.

DO-040-016, Appendix A, *T Plant Weekly Waste Management Area Inspection Data Sheet,* recorded that the inspection of 214-T Building performed on 10/7/2014 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 following week on 11/25/2014 and through the week of 12/3/2014, the weekly Appendix A data sheet identified "crack in floor" with a listed disposition of "floors to be repainted after CWC." It is unclear that the NCO performing the inspection on 11/18/2014 inspected the condition of floors in 214-T Building or if floor repairs had been made and a new crack in the floor was discovered. 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." This data sheet did not include the date and nature of any repairs or remedial actions taken. However, the problem does not appear on future inspection data sheets and appears to be taken care of at this point.

Compliance Problems

The DW inspection on January 22, 2015 found the following compliance problems.

Each problem is covered in three parts:
(1) **Citation from the regulations.**
(2) **Specific observations** from the inspection that highlight the problem.
(3) **Required actions** needed to fix the problem and achieve compliance.

The last pages of this report are a 'Compliance Certificate' listing the violations and the actions required to gain compliance. This certificate must be returned to Ecology within 60 days of receipt. The certificate explains how to complete the form and return it to the Department of Ecology.

This does not relieve you of your continuing responsibility to comply with the regulations at all times.

1. **WAC 173-303-380 Facility recordkeeping. (1) Operating record. The owner or operator of a facility must keep a written operating record at their facility. The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility: (a) A description of and the quantity of each dangerous waste received or managed on-site, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by subsection (2) of this section, recordkeeping instructions.**

Observation: Documentation provided for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009 listed that a receipt date for storage at the facility was "N/A" because the waste was generated at T Plant.

Action Required: Record the dates of storage for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009 into the operating record. Submit to Ecology within 60 days of receipt of this report, documentation showing that the dates of storage have been added to the operating record.

2. **WAC 173-303-380(3)(a). All facility records, including plans, required by this chapter must be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the department who is designated by the director.**

Observation: 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 Waste4 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).

Action Required: Upon receipt of this inspection report, USDOE-RL and CHPRC will respond to Ecology representative's future requests by providing all facility records required by WAC 173-303, Dangerous Waste Regulations to Ecology.

3. **WAC 173-303-400, and by reference, WAC 173-303-320(2)(d). 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. The log or summary must be kept at the facility for at least five years from the date of inspection.**

Observation: 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.

Action Required: Place a notation in the T Plant operating record that the weekly inspection for this time frame was not performed. Submit to Ecology within 60 days of receipt of this report, documentation that the notation was recorded in the operating record.

4. **WAC 173-303-400, and by reference, WAC 173-303-320(2)(d). 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. The log or summary must be kept at the facility for at least five years from the date of inspection.**

and

Agreed Order and Stipulated Penalty, DE10156, Appendix A, Section 1.10.2.2, Track problems resulting from malfunctions and deterioration, operator errors, and discharges (WAC 173-303-320(1)) or necessary repairs or remedial actions (WAC 173-303-320(2)(d)) including the remedy and date of the remedy, keep this information in the operating record, and provide the record upon request (WAC 173-303-380).

Observation: 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.

Action Required: Place a notation in the T Plant operating record listing the date and nature of any repairs or remedial actions taken. Submit to Ecology within 60 days of receipt of this report, documentation that the notation was recorded in the operating record.

5. **WAC 173-303-400, and by reference, WAC 173-303-330(2). Written training plan. The owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records: (a) For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position;**

Observation: 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.

Action Required: Revise PRC-STD-TQ-40228, *T Plant Dangerous Waste Training Plan* to include the job title/position for all personnel who perform DW tasks associated with T Plant. Develop for each job title/position a description which includes the requisite skills, education, other qualifications, and duties. Submit to Ecology within 60 days of receipt of this report, an updated DW training plan that reflects these revisions.

6. **WAC 173-303-400, and by reference, WAC 173-303-630(3). Identification of containers. The owner or operator must label containers in a manner which adequately identifies the major risk(s) associated with the contents of the containers for employees, emergency response personnel and the public (note: If there is already a system in use that performs this function in accordance with local, state or federal regulations, then such system will be adequate). The owner or operator must affix labels upon transfer of dangerous wastes from one container to another. The owner or operator must destroy or otherwise remove labels from the emptied container, unless the container will continue to be used for storing dangerous waste at the**

facility. The owner or operator must ensure that labels are not obscured, removed, or otherwise unreadable in the course of inspection required under WAC 173-303-320.

Observation: 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.

Action Required: Label containers #0077128, #0079701, and all other containers in storage at T Plant with the major risk(s). Submit to Ecology within 60 days of receipt of this report, documentation showing that the major risk(s) labeling has been added to the containers.

Concerns:

1. It is not clear that there is an established method used consistently to account for the amount of MW in the 221-T tank system in the Annual Hanford LDR report. USDOE-RL and CHPRC should establish a standard method for reporting this amount consistently and accurately year after year.

2. HNF-9921, Revision 6, *T Plant Complex Waste Analysis Plan,* Section 2.5, *Discrepant Container Management*, states that the following are discrepant issues and will be tracked in the Discrepant Container Management Program until the issues are resolved. Included in the list of issues are: indications of bulging, containers with unknown contents, containers holding waste prohibited under Section 1.2, containers no longer in good condition and not in compliance with 40 CFR 265.171, inconsistent inventory between container contents and the record, and unexpected liquids are found. WAC 173-303-630(2) states, *if a container holding dangerous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the dangerous waste from the container to a container that is in good condition or manage the waste in some other way that complies with the requirements of chapter 173-303 WAC.* The requirement of this section is to move the DW to a compliant container if a container is not in good condition or manage the waste in some other compliant manner. Placing containers of DW into a program indefinitely without a near-term schedule for correcting the problem does not resolve the non-compliance. The facility WAP should not direct the facility to be out of compliance with the requirements of WAC 173-303-630(2).

3. TPLN-PRO-OP-51748, DO-040-016, Revision 9, *Perform Weekly and Daily Surveillance of WMA's,* Section 1.1 states, *daily inspections are conducted at all T Plant Waste Management Areas (WMAs) [also known as Dangerous Waste Management Units (DWMU)] and Waste Accumulation Areas (WAAs) and shall be performed on a daily basis during normal working hours. Inspections will not be performed on facility closure days. The daily inspection fulfills the requirements listed in WAC 173-303-320(2)(d) and TSR - SAC 5.6.4.* It is unclear what is meant by Waste Accumulation Areas (WAAs) in a TSDF. WAC 173-303-040 defines "storage" as *the holding of dangerous waste for a temporary period* and states that *accumulation of dangerous waste, by the generator on the site of generation, is not storage as long as the generator complies with the applicable requirements of WAC 173-303-200 and 173-303-201.*" If DW or MW is considered accepted into the TSD storage as stated in Section 2.4 of the WAP upon generation, it should be managed under the storage requirements listed in WAC 173-303-280 through -395 and any other requirements listed by reference in these sections. Accumulation of DW or MW should follow the applicable requirements of WAC 173-303-200 and WAC 173-303-201.

COMPLIANCE CERTIFICATE

Return this Completed Form within 60 days of receipt or Request an Extension

Use this form to report if the action(s) required to achieve compliance that were identified during the inspection on January 22, 2015 have been completed.

Complete the shaded portions and mail a copy of this form to Nancy Ware by August 10, 2015 at the following address: Washington Department of Ecology, Nuclear Waste Program, Attention: Nancy Ware, 3100 Port of Benton Boulevard, Richland, Washington 99352.

You may request an extension of the deadlines to achieve compliance. Make the request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to Nancy Ware before the date specified above. Ecology will provide a written approval or denial of your request.

If you have any questions about information in this Compliance Report, please call:
Nancy Ware at (509) 372-7912

The problems listed below must be corrected to comply with Washington DW Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Note the date each action is completed and initial each item. Include required documentation, and make any other comments explaining the actions taken on a separate piece of paper.

1) **WAC 173-303-400, and by reference, WAC 173-303-380 Facility recordkeeping. (1) Operating record. The owner or operator of a facility must keep a written operating record at their facility. The following information must be recorded, as it becomes available, and maintained in the operating record until closure of the facility: (a) A description of and the quantity of each dangerous waste received or managed on-site, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by subsection (2) of this section, recordkeeping instructions.**

Compliance Item	Date Completed	Initials
Record the dates of storage for containers #0047674, #0077122, #0079701, #221T-12-000004, and #221T-96-000009 into the operating record. Submit to Ecology within 60 days of receipt of this report, documentation showing that the dates of storage have been added to the operating record.		

2) WAC 173-303-400, and by reference, WAC 173-303-380(3)(a). All facility records, including plans, required by this chapter must be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of the department who is designated by the director.

Compliance Item	Date Completed	Initials
Upon receipt of this inspection report, USDOE-RL and CHPRC will respond to Ecology representative's future requests by providing all facility records required by WAC 173-303, Dangerous Waste Regulations to Ecology.		

3) WAC 173-303-400, and by reference, WAC 173-303-320(2)(d). 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. The log or summary must be kept at the facility for at least five years from the date of inspection.

Compliance Item	Date Completed	Initials
Place a notation in the T Plant operating record that the weekly inspection for the week of 3/2/2014 through 3/8/2014 was not performed. Submit to Ecology within 60 days of receipt of this report, documentation that the notation was recorded in the operating record.		

4) WAC 173-303-400, and by reference, WAC 173-303-320(2)(d). 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. The log or summary must be kept at the facility for at least five years from the date of inspection.

and

Agreed Order and Stipulated Penalty, DE10156, Appendix A, Section 1.10.2.2, Track problems resulting from malfunctions and deterioration, operator errors, and discharges (WAC 173-303-320(1)) or necessary repairs or remedial actions (WAC 173-303-320(2)(d)) including the remedy and date of the remedy, keep this information in the operating record, and provide the record upon request (WAC 173-303-380).

Compliance Item	Date Completed	Initials
Place a notation in the T Plant operating record listing the date and nature of any repairs or remedial actions taken for the inspection during the week of 12/9/2014. Submit to Ecology within 60 days of receipt of this report, documentation that the notation was recorded in the operating record.		

5) WAC 173-303-400, and by reference, WAC 173-303-330(2). Written training plan. The owner or operator must develop a written training plan which must be kept at the facility and which must include the following documents and records: (a) For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position;

Compliance Item	Date Completed	Initials
Revise PRC-STD-TQ-40228, *T Plant Dangerous Waste Training Plan* to include the job title/position for all personnel who perform DW tasks associated with T Plant. Develop for each job title/position a description which includes the requisite skills, education, other qualifications, and duties. Submit to Ecology within 60 days of receipt of this report, an updated DW training plan that reflects these revisions.		

6) WAC 173-303-400, and by reference, WAC 173-303-630(3). Identification of containers. The owner or operator must label containers in a manner which adequately identifies the major risk(s) associated with the contents of the containers for employees, emergency response personnel and the public (note: If there is already a system in use that performs this function in accordance with local, state or federal regulations, then such system will be adequate). The owner or operator must affix labels upon transfer of dangerous wastes from one container to another. The owner or operator must destroy or otherwise remove labels from the emptied container, unless the container will continue to be used for storing dangerous waste at the facility. The owner or operator must ensure that labels are not obscured, removed, or otherwise unreadable in the course of inspection required under WAC 173-303-320.

Compliance Item	Date Completed	Initials
Label containers #0077128, #0079701, and all other containers in storage at T Plant with the major		

risk(s). Submit to Ecology within 60 days of receipt of this report, documentation showing that the major risk(s) labeling has been added to the containers.		

The Department of Ecology is an equal opportunity agency and does not discriminate on the basis of race, creed, color, disability, age, religion, national origin, sex, marital status, disabled veteran's status, Vietnam Era veteran's status, or sexual orientation. If you have special accommodation needs or require this document in alternative format, please contact Nancy Ware at (509) 372-7912 (Voice) or use the Washington State Relay operator by dialing either 711 or 1-800-833-6388 (TTY).