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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

July 17, 1996

Mr. Jon Peschong, Deputy Manager
Waste Storage Division
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Peschong:

Re: Double Shell Tank Gas Release Events Reporting Requirements

The Washington State Department of Ecology (Ecology) representatives have verbally requested formal notification of Gas Release Events (GREs). During a discussion with you on June 20, 1996, you requested a basis for the regulatory authority by which this request was made.

Except where expressly provided, the Washington Administrative Code (WAC) Chapter 173-303 applies to all persons who handle dangerous wastes in the state of Washington (WAC 173-303-020 Applicability). Therefore, the special provisions for ignitable or reactive wastes, (WAC 173-303-395) and in particular the documentation requirements of WAC 173-303-395(1)(c), are applicable to the Double-Shell Tank (DST) system. In addition, WAC 173-303-390(3)(d) (Facility Reporting) requires the owner or operator to submit any other reports required by Ecology.

Considering the safety issues associated with GREs, and Hanford's history of such events, Ecology feels it is important to be made aware of these events when they happen and will likely make this reporting requirement a condition of the DST permit to be issued in 1999. Therefore, Ecology expects to be formally notified of all GREs within 24 hours of occurrence and for the notification process to be initiated upon receipt of this letter. The formal notification is requested to be made to Ecology's Safety Program and DST Permit Manager representatives.

Mr. John Peschong
July 11, 1996
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If you or your staff have any questions regarding this letter, please contact Alex Stone at (509)736-3018 or Laura Cusack at (509) 736-3038.

Sincerely,



Alex Stone
Safety Project Manager
Nuclear Waste Program



Laura J. Cusack
Operations Project Manager
Nuclear Waste Program

AS/LC:mf

cc: James McClusky, USDOE
Maureen Hunemueller, USDOE-HQ
Merylyn Reeves, HAB
Ralph Arcuro, DNFSB
Administrative Record, Double Shell Tanks Part B Permit, M-40