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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7591

March 13, 2000

Mr. James E. Rasmussen, Acting Director  
United States Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, Washington 99352

**RECEIVED**  
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**EDMC**

Dear Mr. Rasmussen:

Re: Reduction of Resource Conservation and Recovery Act (RCRA) Inspections

The Washington State Department of Ecology (Ecology) has reviewed the U.S. Department of Energy's (USDOE) request for reducing the frequency of RCRA inspections at the 334 Tank Farm, 311 Tank Farm, and the Waste Acid Treatment System (WATS) and Uranium-Bearing Piping Trench portions of the 300 Area WATS (TS-3-1). According to Washington Administrative Code (WAC) 173-303-320, inspections are required of all treatment, storage, and disposal (TSD) facilities. The intent of the inspections is "... to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or a threat to human health." This code also states that the "... inspections need to be conducted often enough to identify problems before they can cause damage to human health or the environment."

USDOE reported, and Ecology concurs, that WATS is no longer an operating TSD unit, and that the 334 Tank Farm, 311 Tank Farm, and the WATS and Uranium-Bearing Piping Trench portions of WATS are vacant and are roped off with controlled access. USDOE requested a reduction in the frequency of inspections based on reduced probability of an incident occurring.

Due to all equipment being removed and no TSD activities being performed at these portions of WATS, Ecology will agree to reducing the inspection frequency to a minimum of once every six (6) months until the closure activities are complete. However, a written schedule of the inspection frequency, identifying where the inspection plan and log book will be kept, needs to be sent to Ecology for review and approval prior to implementing this change.

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If you have any questions regarding the information contained in this letter, please feel free to contact me at (509) 736-3025.

Sincerely,



Greta P. Davis  
Nuclear Waste Program

GPD:lkd

cc: Mike Goldstein, EPA  
Ellen Mattlin, USDOE  
John Remaize, BWHC  
Jon Perry, FDH  
Scott Luke, WMH  
J.R. Wilkinson, CTUIR  
Donna Powaukee, NPT  
Russell Jim, YIN  
Mary Lou Blazek, OOE  
Administrative Record: 300 WATS, 300-FF-2 ROD, and 300-FF-5 ROD