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## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

Mr. Kenneth D. Feigner, Chief  
Waste Management Branch  
Mail Stop 533  
U. S. Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, Washington 98101

Mr. Richard A. Burkhalter, Supervisor  
Industrial Section  
Washington Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504

Dear Messrs. Feigner and Burkhalter:

### COMPLIANCE WITH NINETY DAY STORAGE REQUIREMENTS

On March 7, 1986, your offices were provided with our plan designed to assure that the 90-day storage requirement for nonradioactive hazardous wastes established by 40 CFR 262.34 and WAC 173-383-200 was met by the Department of Energy, Richland Operations Office. This letter constitutes our report on compliance with the 90-day storage requirement.

The enclosed letter from Rockwell Hanford Operations documents the basis on which we believe that the 90-day storage requirement was met as of July 14, 1986. This condition was achieved by implementation of the various activities described in our March 7, 1986 submittal. As noted in the Rockwell letter, the Disposal Requests, Disposal Analyses and Manifest Forms related to the 90-day storage compliance effort are available for review and have been consolidated in eight three-ring binders located in Building 2750-E, 200 East Area. These documents provide evidence of the substantial effort we have undertaken to achieve compliance. The system which has been developed provides a mechanism to assure that known hazardous wastes are transferred to permitted storage or disposal facilities within 90 days after accumulation. In a limited number of cases, if a material is not known to be hazardous, it is designated through sampling and chemical analysis. In accordance with our understanding of the regulations, accumulation dates for these substances are associated with the date on which a material was determined to be a hazardous waste through the analysis. We will continue to seek improvements in our system to provide greater assurance towards maintaining compliance with the 90-day storage requirements in the State Dangerous Waste Regulations.

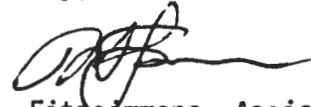
AUG 04 1986

Messrs. Feigner and Burkhalter

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If you have any questions regarding this matter please contact me or Mr. P. J. Krupin of my staff on (509) 376-9989.

Sincerely,

A handwritten signature in black ink, appearing to be 'T. R. Fitzsimmons', with a long horizontal flourish extending to the right.

T. R. Fitzsimmons, Assistant Manager  
for Safety, Environment, and Security

Enclosure