



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

February 23, 2000

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EDMC

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

Dear Mr. Rasmussen:

Re: Reduction of Resource Conservation and Recovery Act (RCRA) Inspections for
303-K Storage Facility

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 303-K Storage Facility. 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 the unit to be no longer operating as a TSD, and total inventory has been removed from the TSD. USDOE requested a reduction in the frequency of inspections based on reduced probability of an incident occurring.

Due to all dangerous waste being removed and no TSD activities being performed, 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.

If you have any questions regarding the information contained in this letter, please feel free to contact me at (509) 736-3019.

Sincerely,

Jeanne J. Wallace

Jeanne Wallace, Waste Management Project Manager
Nuclear Waste Program

cc: Mike Goldstein, EPA
Ellen Mattlin, USDOE
Jon Perry, FDH
John Remaize, FDH
Fred Ruck, III, FDH
Roger Bowman, WMH

Scott Luke, WMH
J.R. Wilkinson, CTUIR
Pat Sobotta, NPT
Russell Jim, YIN
Mary Lou Blazek, OOE
Administrative Record: 303-K