



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

November 23, 1993

Ms. Annabelle Rodriguez
Department of Energy
P.O. Box 550 MS-A515
Richland, WA 99352

Dear Ms. Rodriguez:

Re: Request to use Alternative Release Detection Method

Ecology has reviewed your request for approval to use an alternative release detection method for petroleum Underground Storage Tanks (USTs) on the Hanford Site. To be consistent with the interpretation and enforcement of the Washington Administrative Code (WAC) 173-360, Ecology can not approve your request.

The proposed alternative method for using weekly tank gauging for tanks with a volume greater than 2000 gallons is inconsistent with UST regulations. The tanks are fully regulated. Daily inventory control or another approved method of release detection should be used in accordance with requirements.

If you have any questions, please contact me at (509) 736-3011.

Sincerely,

Jeff Phillips
Tanks Manager
Nuclear and Mixed Waste Management Program

JP:mf

cc: Doug Sherwood, EPA
Mike Mihalic, WHC
Jeff Luke, WHC
Dennis Poor, WHC



CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

J. Phillips, Ecology
(J. S. Hill, WHC) 2210

A. L. Rodriguez, RL

Incoming: 9307072
XRef: 9307052 32801
XRef: 9359063D 32800

Subject: REQUEST TO USE ALTERNATIVE RELEASE DETECTION METHOD

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		G. D. Carpenter	H6-30	
		L. P. Diédiker	TI-30	
		J. S. Hill	H6-25	
		B. A. Holmberg	G4-02	
		G. W. Jackson, Assignee	H6-21	
		R. J. Landon	H6-22	
		R. E. Lerch	B3-63	
		J. J. Luke	H6-25	
		P. J. Mackey	B3-15	
		H. E. McGuire, Level 1	B3-63	
		A. D. Poor	G4-10	
		E. A. Smith	H6-22	
		J. E. Turnbaugh	H6-25	
		J. F. Woods	G4-04	
		EPIC	H6-08	
		Project Files	R1-28	
		JSH/File/LB	H6-25	