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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

April 16, 1999

Mr. James E. Rasmussen, 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

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 333 Building, 334-A Building, and 303-F Building portions of the 300 Area Waste Acid Treatment System (WATS). 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 goes on to say 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 buildings 303-F and 334-A are vacant and locked with controlled access. In addition, the 333 Building portion of WATS is identified and has been isolated to control 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 Comprehensive Environmental Response Compensation Liability Act (CERCLA) remediation is performed. 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 questions regarding the information contained in this letter, please feel free to contact me at (509) 736-3025.

Sincerely,

*for*  
*Alyse Rom (Greta Davis)*

Greta P. Davis  
Nuclear Waste Program

AS:GPD:sb

cc: Dave Einan, 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