



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

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OCT 13 1999

Mr. E. R. Skinnarland  
200 Area Section Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 West 4th Avenue  
Kennewick, Washington 99336-6018

Dear Mr. Skinnarland:

APPROVAL OF QUARTERLY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) TREATMENT, STORAGE, AND DISPOSAL INSPECTIONS (TSD) OF THE 216-B-63 TRENCH

This letter requests approval from the Washington State Department of Ecology to change from weekly to quarterly RCRA TSD inspections at the 216-B-63 trench.

The 216-B-63 trench is an interim status surface impoundment on the Hanford Site. According to 40 Code of Federal Regulations 265-006(a)(2), an interim status hazardous waste surface impoundment (including dikes and vegetation surrounding the dike) must be inspected at least once a week to detect any leaks, deterioration, or failures in the impoundment.

The 216-B-63 was required to cease receipt of hazardous waste by November 9, 1988, and begin closure. These requirements have been met and the closure time frame has been established by the Hanford Federal Facility Agreement and Consent Order compliance schedule. Weekly dike inspections at a surface impoundment are intended to minimize the possibility of dike failure. Such concerns are pertinent during the operational phase, but not during the closure phase after all liquid waste discharges have ceased and no liquid waste remains in the unit. In addition, the 216-B-63 trench has been backfilled and stabilized.

We believe the quarterly surveillance frequency in place at the 216-B-63 trench provides adequate protection in lieu of a weekly inspection given the non-operational status of the unit and intent of the regulatory provision.



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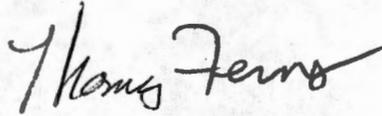
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Mr. E. R. Skinnarland

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We request your approval of this strategy. If you have any questions regarding this matter, please contact me at (509) 372-0649.

Sincerely,

A handwritten signature in black ink that reads "Thomas Ferns". The signature is written in a cursive style with a long horizontal stroke at the end.

T. W. Ferns, Project Manager  
Environmental Restoration Division

ERD:TWF

cc: C. J. Kemp, BHI  
J. J. McGuire, BHI  
T. A. Wooley, Ecology