



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

June 12, 2002

Mr. James E. Rasmussen
Environmental Management Division
United States Department of Energy
P.O. Box 450, MSIN:
Richland, Washington 99352

RECEIVED
JUN 25 2002

EDMC

Dear Mr. Rasmussen:

Re: (1) Ecology Letter Accepting Submittal of "RPP-9645, Rev. 0, Single-Shell Tank (SST) System Surveillance and Monitoring Program Description Required, Completing the Hanford Federal Agreement and Consent Order M-23-22 due February 28, 2002", dated April 24, 2002 ✓

(2) Letter to Michael Wilson, Washington State Department of Ecology, from James E. Rasmussen, United States Department of Energy, 02-OMD-009, "Submittal of M-23-22 Single-Shell Tank (SST) System Surveillance and Monitoring Program Description", dated February 22, 2002, with Report, RPP-9645, Rev. 0 ✓

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The Washington State Department of Ecology (Ecology) reviewed the above referenced letters and report. Further review of report "RPP-9645, Rev. 0, Single-Shell Tank (SST) System Surveillance and Monitoring Program Description" has resulted in a determination that the report is incomplete and not acceptable. Therefore, I respectfully rescind our letter of April 24, 2002, as listed above, for the following reasons:

1. Milestone M-23-22-T01 (G) requires inclusion of the United States Department of Energy's (USDOE's) proposed change process for modifying specific component leak-detection instrumentation as component conditions (or instrumentation) changes. In the report, you identify this requirement as being excluded, but planned for inclusion in a subsequent report. Your statement does not adequately address the intent of item (G), nor have you presented any additional justification for exclusion. Therefore, your report is deficient. Because Milestone M-23-22-T01(G) is a target milestone, Ecology, will take no enforcement action as a consequence of this deficiency. However, Ecology will require the omitted information be included in the report for M-23-23, "Submit Single-shell Tank System Leak Detection and Monitoring Functions and Requirements Document for Ecology Approval", an enforceable document due June 15, 2002.
2. The report refers to, but does not define or reference previous reports that define: Inactive Piping, Inactive Facilities, and Inactive Miscellaneous Underground Storage Tanks.

Mr. James E. Rasmussen

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cc: Dave Bartus, EPA
Ellen Mattlin, USDOE
Mary Beth Burandt, USDOE-ORP
Woody Russell, USDOE-ORP
Andy Stevens, USDOE-ORP
Deborah Williams, USDOE-ORP
Carole Leach, CHG
Pete Sederburg, CHG
Warren Thompson, CHG
Jeff Hertzell, FH
Owen Kramer, FH
Todd Martin, HAB
Pat Sobotta, NPT
Russell Jim YN
Ken Niles, OOE
Administrative Record: M-23 and TWRS/SSTs