



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

March 19, 1998

Mr. James E. Rasmussen
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 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 reduced frequency of RCRA inspections at the 313 Building, a portion of the WATS unit. Inspections are required, according to Washington Administrative Code 173-303-320, of all treatment, storage, and disposal facilities. The intent of the inspections are "to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste 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."

The south end of the 313 Building (WATS portion) is vacant of dangerous waste, under controlled access, and will remain vacant until demolition (due to building structural safety concerns and radiological conditions) is complete; the remainder of the unit is currently undergoing closure. Ecology concurs that weekly inspections are no longer necessary for the south end of the 313 Building. USDOE may opt to change the frequency of their inspections based on the probability of an incident occurring. As the Ecology sub-project manager, I require an inspection of the building, and its surroundings, be performed (at a minimum) once every six months until facility transition and demolition of this building transpires. A written schedule of the inspection frequency, identifying where the inspection plan and log book will be kept, shall be sent to Ecology for review and approval within 30 days of receipt of this letter.

If you have any questions regarding the above, please contact me at (509) 736-3025.

Sincerely,

Greta P. Davis, 300 Area Sub-Project Manager
Nuclear Waste Program

GPD:skr

cc: Ellen Mattlin, USDOE Jon Remaize, B&W
Russell Jim, YIN Dave Einan, EPA
Mary Lou Blazek, ODOE Scott Luke, RFSH
Administrative Record: 300 WATS, 300-FF-2 ROD, and 300-FF-5 ROD