

October 31, 2006

Jose Kou, Chief,
California Environmental Protection Agency
Department of Toxic Substances Control
1011 N Grandview Ave.
Glendale, CA 92101-220

Subject: Inspections of the Hazardous Waste Management Facility
(CAD000629972).

Dear Mr. Kou:

The Hazardous Waste Management Facility (HWMF) remains subject to the facility inspection requirements of Special Condition III.G of its Hazardous Waste Facility Permit ("permit") until applicable closure requirements are completed. As required by its permit, the facility is in good shape, is not deteriorating, and security fencing, in good condition, surrounds both permitted buildings (Buildings 133 and 29). The facility has not been operated since 1997 and no wastes have been in storage there since that time.

We fully recognize that performing and recording weekly inspections are important to the maintenance of the HWMF. On October 2, 2006, Safety, Health and Environmental Affairs ("SHEA") staff learned that inspections had not been performed for approximately 8 weeks. A review of inspection records that was conducted by SHEA staff on October 3, 2006 indicated that weekly inspections had not been recorded in accordance with Special Permit Condition III.G on occasions during the previous year. This included occasions where no entries were made, and occasions where entries were incomplete.

On October 2, 2006, SHEA staff inspected the facility and recorded the inspection. Weekly inspections have been conducted and recorded since. These inspections determined that the HWMF is properly maintained. No adverse impact to human health or the environment occurred.

SHEA staff has taken action to prevent future reoccurrence of this situation. The responsibility for the HWMF inspections has been reassigned to personnel who are also responsible for inspecting the Radioactive Materials Handling Facility. SHEA staff has emphasized to these personnel the importance of conducting and properly documenting inspections. Further, SHEA staff will review and confirm the proper documentation and performance of these inspections monthly.



This report is submitted in accordance with General Permit Conditions II.O.7 and II.C. If you need further information, please contact Brian Sujata at (818) 466.8843.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Tom Gallacher
Director
SSFL – Safety, Health & Environmental Affairs

cc: Michael Lopez, DOE-Oakland

SHEA-104447

