

March 30, 2005

Michael A. Bussell, Director  
Environmental Protection Agency  
Office of Compliance and Enforcement  
1200 Sixth Avenue  
Seattle, WA 98101-3199

RE: Region 10 Hazardous Waste Compliance Program Review

Dear Mr. Bussell,

This letter is in response to The Draft Ecology Hazardous Waste and Toxics Reduction Program Review document provided to us on March 3, 2005.

We appreciate the recommendations provided in this document and we have no additional comments to add. The HWTR Program recognizes that there are issues which we need to work on, and as you know, we have made progress since the review in areas such as data completeness and data management, among others.

The HWTR Program and I also appreciate the time spent by EPA Region 10 staff in developing a series of "program review talking points" which your staff provided to us for discussion at our February, 16, 2005 Management Team Meeting. These talking points shifted the focus from the five-year-old program review period, to current program activities and issues. We want to acknowledge Betty, Jack and Mike's time and effort here.

Even though we share the same values regarding our commitment to environmental protection, it is clear that our methods for gaining and documenting compliance differ from EPA's in several areas. There is always room for improvement, and as part of the improvement process we need to better understand each others policies and statutory constraints, and then craft compromises where appropriate.

Finally, as I outlined in my letter to you dated August 2, 2004, I feel that aspects of the review process could have been managed in a manner to better benefit both Region 10 and the HWTR Program. I am also concerned about the time and expense of such reviews, especially if they are going to be more frequent than in the past.

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If another program review were to occur in our upcoming biennium (July '05 – June '07), we would need to work together to modify our PPA commitments to provide the resources for the review.

Thank you for the opportunity to comment and if you have any questions, please do not hesitate to contact me at (360) 407-6702.

Sincerely,

Darin Rice  
Program Manager  
Hazardous Waste Toxic Reduction Program