

General

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Comments of the LANL Waste Analysis Plan

1. The plan is marked "ROUGH DRAFT" and so does not bind LANL to any waste analysis program. This is not acceptable.
2. The plan uses the phrase "when chemical substances are declared to be waste." This approach is fine as long as it is not abused (as it has been at some other facilities). Used materials, for examples, are considered wastes by the EID unless they can be certified by facility personnel to have a reasonable probability of re-use or reclamation. Off-specification chemicals are also wastes unless they can be so certified.
3. The waste analysis plan must include samples of all waste analysis sheets for present and past "large quantity waste streams." How is a "large quantity waste stream" defined?
4. It is acceptable to not analyze small quantities (less than one gallon) of unknown wastes if 1) these wastes are handled with the caution (in terms of potential occupational exposures) accorded the most hazardous substances LANL handles; 2) if they are landfilled within 90 days in the disposal unit(s) reserved for the most potentially mobile and toxic wastes LANL handles; 3) if a complete operating record is kept of the disposal of these wastes; and 4) if these unknown wastes do not exceed 10 occurrences per month (check this).
5. Larger quantities than one gallon of waste must be analyzed sufficiently to determine if the waste is a pure listed waste or is a hazardous waste by the mixture rule or by its characteristics. It is not sufficient to "define" the waste "in terms of basic parameters such as pH and ignitability." The waste identification scheme of 204.A.3., in other words, must be followed.
6. Test procedures and sampling techniques must be described in more detail. In particular, the quality assurance procedures used by LANL's labs for waste analysis should be specified. Such procedures must include periodic split sample analysis by non-DOE-funded laboratories.



12192