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Comments on the LANL Waste Analysis Plan

Revisions made at the Sept. 11 and Sept 26 meetings are in **bold**.

**(LANL's waste analysis plan will be submitted Nov. 1, 1984)**

1. The plan is marked "ROUGH DRAFT" and so does not bind LANL to any waste analysis program. This is not acceptable. **LANL agreed to correct this.**

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 example, 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 blank 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 completely 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) they are landfilled within 90 days in the disposal shaft(s) reserved for the most potentially mobile and toxic wastes LANL handles; 3) a complete operating record is kept of the disposal of these wastes; and 4) these unknown wastes do not exceed a very small fraction of the wastes handled. Reactive wastes cannot be landfilled, and LANL must at least test these wastes for reactivity, pH, and ignitability prior to lab-packing for disposal.

Larger quantities than one gallon of waste must be analyzed sufficiently to determine if the waste is a pure listed waste or is a regulated 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. It is acceptable to bulk unknown wastes, up to one (absorbed) drum in quantity, after careful compatibility testing, and run analyses on the bulked waste.

The EID expects that LANL administrative procedures will, in time, reduce the frequency of occurrence of unknown wastes to a very small (de minimis) fraction of its wastes. As no specific variance from the regulatory guidelines of 204.A.3. is provided in those regulations, LANL must keep a special record of unknown waste disposed--both waste landfilled and waste detonated--available for EID inspectors, or construct its operating record so that summary data on unknown wastes can be readily accessed during the course of an inspection. This data must be presented on



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Waste Analysis Comments, Continued

future biennial facility reports.

**The EID feels that the detonation of small quantities of unknown and unsamplable, but potentially very dangerous, substances is preferable to exposing workers to unknown hazards. LANL's waste management group should use its best discretion in such cases.**

5. 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 specification must include the percent of samples which will be split for analysis by independent (i.e. non-DOE-funded) laboratories. **The requirement for split samples was dropped by EID at the Sept. 26 meeting.**