



Department of Energy
Albuquerque Operations Office
P.O. Box 5400
Albuquerque, New Mexico 87115

SEP 30 1988

Mr. David Bates
Mr. Michael Horan
Taos Environmental Association
P. O. Box 476
Ranchos de Taos, New Mexico 87557

Dear Messrs. Bates and Horan:

Please refer to your August 19, 1988 Freedom of Information Act (FOIA) request which was referred to this office for response. You had requested a copy of:

1. Certification of Waste Management Plan prepared by Los Alamos National Laboratory for the U. S. Environmental Protection Agency;
2. the hazardous waste minimization plan corresponding to the waste minimization plan certification;
3. the certification of compliance with the "Federal Office Paper Recovery Act;" and
4. the report to the public of stated reasons for not following the requirements of 40 CFR, Ch. 1.

→ Los Alamos National Laboratory (LANL) does not have a written waste minimization plan. The Federal Office Paper Recovery Act and the regulations in 40 CFR, Ch. 1 do not require certification and submittal of a plan to the U. S. Environmental Protection Agency (EPA). Because LANL has not been issued a hazardous waste permit, LANL has not been required to submit a certification under RCRA Section 3005 (h). Therefore, there are no records responsive to your request.

Enclosed are two pages excerpted from the Los Alamos National Laboratory 1987 Biennial Report submitted to EPA relating to Waste Minimization. We hope you will find this information useful.

There is no charge for the enclosed two pages.

Sincerely,

(Ms.) Donnie H. Martin
Freedom of Information Officer
Information Programs Staff

Enclosures

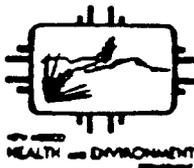


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BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER

SITE NAME Los Alamos National Laboratory

EPA ID NO. NM 01 81 91 01 01 11 01 51 11 51



FORM
WM

STATE OF NEW MEXICO
ENVIRONMENTAL IMPROVEMENT DIVISION
HAZARDOUS WASTE MANAGEMENT SECTION

1987 Hazardous Waste Generation
and Management Report

WASTE MINIMIZATION

PART I

WHO MUST COMPLETE THIS FORM?

Form WM Part I, describing efforts undertaken to implement waste minimization programs, must be completed by all generators required to file an Annual/Biennial Report. This requirement was established in response to statutory provisions included in the Hazardous and Solid Waste Amendments of 1984 (HSWA).

NOTE: Generators shipping hazardous waste off site are required to certify, on Item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.

INSTRUCTIONS:

Please read the detailed instructions on page 29 of the 1987 Hazardous Waste Generation and Management Report Instructions booklet before completing this form.

Answer questions 1 through 10. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.

1. Did this site create or expand a source reduction and recycling program?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Create	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Expand	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Did this site have a written policy or statement that outlined goals, objectives and methods for source reduction and recycling of hazardous waste?

	1987	1986	Prior Years
Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. What was the dollar amount of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste? ENTER ZERO (0) IF NONE.

	1987	1986	Prior Years
Capital expenditures	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>
Operating costs	\$ <u>204,000</u>	\$ <u>7,000</u>	\$ <u>-0-</u>

4. Did this site have an employee training program or provide incentives (bonuses, awards, personal recognition, etc.) to identify and implement source reduction and recycling opportunities and activities?

	1987		1986		Prior Years	
	Yes	No	Yes	No	Yes	No
Training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Incentives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

AID NO. [NIM101819101011015115]

9. What factors have delayed or prevented implementation of on-site or off-site RECYCLING opportunities. MARK NEXT TO ALL THAT APPLY.

- a. Insufficient capital to install new recycling equipment or implement new recycling practices.
- b. Lack of technical information on recycling techniques applicable to this site's specific production processes.
- c. Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- d. Concern that product quality may decline as a result of recycling.
- e. Requirements to manifest wastes inhibit shipments off site for recycling.
- f. Financial liability provisions inhibit shipments off site for recycling.
- g. Technical limitations of product processes inhibit shipments off site for recycling.
- h. Technical limitations of production processes inhibit on-site recycling.
- i. Permitting burdens inhibit recycling.
- j. Lack of permitted off-site recycling facilities.
- k. Unable to identify a market for recyclable materials.
- l. Other (SPECIFY) _____

10. Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK NEXT TO ALL THAT APPLY.

	1987		1986		Prior Years	
	Technical	Financial	Technical	Financial	Technical	Financial
a. Local government	<input type="checkbox"/>					
b. State government	<input type="checkbox"/>					
c. Federal government	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Trade associations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Educational institutions	<input type="checkbox"/>					
f. Suppliers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Other parts of your firm	<input type="checkbox"/>					
h. Other firms/consultants	<input type="checkbox"/>					
i. No request made	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Other (conferences, literature, etc.) _____	<input type="checkbox"/>					

Comments: