



General

1190 St. Francis Drive
Santa Fe, New Mexico 87503

GARREY CARRUTHERS
Governor

CARLA L. MUTH
Secretary

MICHAEL J. BURKHART
Deputy Secretary

October 6, 1988

Certified Return Receipt Requested
P-484 098 955

Mr. Harold E. Valencia
Area Manager
U.S. D.O.E. Area Office
Los Alamos, NM 87544

RE: NM 0890010515

Dear Mr. Valencia:

In conducting a file review I could find no response to your letter of December 28, 1987, regarding the practice of detonating unstable or nontransportable cylinders of reactive gases. This practice falls under the interim status provisions for Thermal Treatment, HWMR-4, Section 206.C.11. (HWMR-5, Part VI, Section 265. Subpart P.). While we have allowed the safety considerations of dealing with this type of waste container to override the literal provisions of the regulations, this practice is not completely acceptable under RCRA. Consequently LANL should seek an alternative method to deal with these cylinders.

In the meantime, the EID will accept your letter of December 28, 1987; Standard Operating Procedure for HSE-7, Handling and Transport of Reactive Wastes and Gas Cylinders that are to be Detonated, as approved April 13, 1987; and S.O.P. M-8-5, Standard Operating Procedures For Firing Operations, as approved November 25, 1987; as interim status procedures under HWMR-4, Section 206.C.11. Your attention, however, is directed to HWMR-4, Section 206.C.11.c. which requires certain waste analyses prior to treatment. You should ensure that the operating records contain documentation of such analyses.

EQUAL OPPORTUNITY EMPLOYER



12241

Harold E. Valencia
October 6, 1988
Page Two

The EID will adopt 40 CFR 264 Subpart X as HWMR-6, probably sometime in calendar year 1989. When that occurs thermal or other treatment such as this will need to be added to the LANL RCRA permit. At that time these interim procedures will be evaluated for inclusion in the permit. In all likelihood they will not be acceptable for permitting and will have to be replaced with some acceptable method. Therefore you should begin now to develop or obtain some alternative technology.

If you have any questions please call me at 827-2923.

Sincerely,



C. Kelley Crossman
Permitting Supervisor
Hazardous Waste Section

CKC/pv