

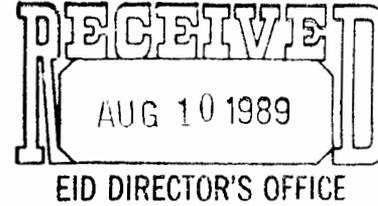


Boyd

*General
HARRIS*

J.P.

Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, New Mexico 87544



AUG 08 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard W. Mitzelfelt
Director
Environmental Improvement Division
Health and Environment Department
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, New Mexico 87503

Dear Mr. Mitzelfelt:

The Department of Energy (DOE) is submitting, with this letter, a subject plan titled, "Plan for Identification and Characterization of Solid Waste Streams at Los Alamos National Laboratory," in accordance with paragraph 1 (e) of the Compliance Order/Schedule (CO/S) in Docket Nos. 880801 and 880801-A, dated August 30, 1988. This submission is made without prejudice to or waiver of any rights of the DOE and the Los Alamos National Laboratory to contest said CO/S.

Please call Mr. Jim Phoenix of my staff at 667-5288 if you have any questions concerning this submission.

Sincerely,


Harold E. Valencia
Area Manager

Enclosure

cc w/o enclosure:
J. Puckett, HSE-DO, LANL, MS K491
Gini Nelson, Asst. Gen. Counsel, EID/Santa Fe

LTP:JAP:0080



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**PLAN FOR IDENTIFICATION AND CHARACTERIZATION
OF SOLID WASTE STREAMS AT LOS ALAMOS NATIONAL LABORATORY**

**ENVIRONMENTAL SURVEILLANCE GROUP (HSE-8)
HEALTH, SAFETY & ENVIRONMENT DIVISION
LOS ALAMOS NATIONAL LABORATORY
LOS ALAMOS, NEW MEXICO**

JULY 1989

**PLAN FOR IDENTIFICATION AND CHARACTERIZATION OF
SOLID WASTE STREAMS AT LOS ALAMOS NATIONAL LABORATORY**

I. INTRODUCTION

This document is presented in fulfillment of the requirement to submit a plan for performing analyses on all waste streams under a Compliance Order/Schedule dated August 30, 1988, from the New Mexico Environmental Improvement Division (EID). This plan is subject to EID approval and will not be implemented until written approval of the plan is received by the Los Alamos National Laboratory from the EID. The Laboratory requests that the EID discuss any proposed modifications to this plan with management of the Laboratory's Environmental Surveillance Group (HSE-8) and the Department of Energy, Los Alamos Area Office, before the modifications are approved as part of the Plan.

Hazardous Waste Management Regulations adopted by the New Mexico Environmental Improvement Board (HWMR-5) specify requirements for identification and listing of hazardous waste (HWMR-5, Part II), and standards applicable to generators of hazardous waste (HWMR-5, Part III). The purpose of this plan is to develop and implement a program to demonstrate full compliance with the requirements for listing of solid waste streams and determining if each waste stream is a hazardous waste. The program will provide documentation of the types, characteristics, and quantities of solid wastes generated at the Los Alamos National Laboratory.

II. METHODS OF IDENTIFICATION AND CHARACTERIZATION

To ensure that solid wastes generated throughout the Laboratory have been properly identified and characterized, a program will be implemented that maximizes participation by the operating groups, the generators of solid wastes. Each operating group will be required to complete a Waste Profile Sheet for every solid waste stream, as defined in HWMR-5, Part II, Section 261.2, associated with their respective operations. Technical support in completion of the Waste Profile Sheets and in determining whether each waste stream is a hazardous waste will be provided by the Environmental Surveillance Group (HSE-8). Specific information requirements of the Waste Profile Sheet will include:

- Laboratory Group or other organization
- Contact name
- Date form is completed
- Laboratory Technical Area
- Building, Structure or other location information

- Waste description
- Information concerning the process generating waste
- Waste form
- Waste composition
- Waste generation rate and volume
- Representative sampling methods, as applicable
- Chemical analysis test methods, as applicable
- Whether the Sheet contains classified or other sensitive information

A separate Waste Profile Sheet will be completed for each waste stream.

Determinations of whether each waste stream is a hazardous waste will be made using the methods specified in HWMR-5, Part III, Section 262.11. The methods will involve the following:

(a) first, a determination will be made as to whether the waste is excluded from regulation under HWMR-5, Part II, Section 261.4. All waste streams excluded will be identified and fully documented as to the basis of the exclusion;

(b) next, a determination will be made as to whether the waste is listed as a hazardous waste in HWMR-5, Part II, Section 261, Subpart D. Such determinations will be documented;

(c) if the waste is not listed as a hazardous waste in HWMR-5, Part II, Section 261, Subpart D, then a determination will be made as to whether the waste is identified in HWMR-5, Part II, Section 261, Subpart C by either:

(1) testing the waste according to the methods set forth in HWMR-5, Part II, Section 261, Subpart C, or an equivalent method approved by the EID under HWMR-5, Part I, Section 260.21. Specific tests will be identified and documented; or

(2) applying knowledge of the hazard characteristic of the waste in light of the materials or processes used. Knowledge of process determinations will be fully documented.

Waste profile sheets and documentation of the determinations of whether each solid waste stream is a hazardous waste will be compiled and maintained in centralized locations. It is expected that much of the information will be classified as national security information that must be protected from disclosure, and all classified information will be handled under Laboratory and Department of Energy (DOE) security regulations. Access to

any classified information will be restricted to those having an appropriate DOE security clearance, and will be available to EID or Environmental Protection Agency (EPA) personnel with an appropriate DOE clearance. Certain other information is considered by the DOE to be sensitive, even though it is unclassified, and cannot be released by the Laboratory for public dissemination. This type of information (for example, Unclassified Controlled Nuclear Information, Export Controlled Information, Official Use Only information) is generally available to persons with a need-to-know (including EID or EPA personnel), but is not available for public dissemination. Information not classified as national security information or otherwise restricted will be freely available for inspection by EID or EPA personnel, and could be available to the general public.

III. SCHEDULE FOR IDENTIFICATION AND CHARACTERIZATION OF WASTE STREAMS

Confirmation of solid waste stream identification and characterization will be completed according to the following schedule:

(1) within three months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 0, 1, 2, and 4;

(2) within six months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 5, 6, 7, and 8;

(3) within nine months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 9, 10, 11 and 12;

(4) within twelve months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 13, 14, 15, and 16;

(5) within fifteen months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 18, 19, 20 and 21;

(6) within eighteen months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 22, 26, 28, and 29;

(7) within twenty-one months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 3, 30, 31, and 32;

(8) within twenty-four months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 33, 35, 36, and 37;

(9) within twenty-seven months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 39, 40, 41, and 43;

(10) within thirty months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 44, 46, 47, and 48;

(11) within thirty-three months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 49, 50, 51, and 52;

(12) within thirty-six months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 53, 54, 55, and 56; and

(13) within thirty-nine months of the date of approval of this plan by the EID, the listing of every solid waste stream and determination if each waste stream is a hazardous waste will be completed for each building and site in Technical Areas 57, 58, 59, and all other Laboratory sites not identified above.

Waste streams in each technical area will be reevaluated on an annual basis, with the listing of every waste stream and determination if each waste stream is a hazardous waste to be completed every 12 months after the date for that technical area specified above.

IV. QUARTERLY REPORTS

Quarterly progress reports will be submitted to the EID. The reports will be submitted no more than sixty calendar days from the end of each quarter. The first quarter will be three months after and the final quarter will be thirty-nine months after approval of this plan by the EID. Progress reports will list, by technical area, (1) all waste streams that have been identified during that quarter; (2) each waste stream determined to be a hazardous waste during that quarter; (3) the basis for determination of each hazardous waste stream; and (4) the location of documentation relating to waste streams identified or characterized during that quarter. It is understood, however, that these quarterly reports will not contain classified or otherwise sensitive information as discussed under Section II above (pages 2 and 3).