

Teri
Return to RAK

interoffice

MEMORANDUM

g/m/96

to: Mr. Ronald Kern, Technical Compliance Program Manager
from: Kim T. Hill, Environmental Engineer *TK*
thru: Teri Davis, Technical Compliance Supervisor *TD*
subject: Policy on the Management of Investigation-Derived Waste
Los Alamos National Laboratory (LANL)
date: April 3, 1996

As requested by you, I conducted a review of the LANL-generated document entitled "Policy on Management of Investigation Derived Waste" (the "Policy") dated July 7, 1995. However, subsequent discussions within the Hazardous and Radioactive Materials Bureau (HRMB) and interations with LANL staff have affected the conclusions drawn from my review of the Policy. The following factors which influenced my review are summarized below:

A Standard Operating Procedure (SOP) entitled "Management of Environmental Restoration Wastes (LANL-ER-AP-05.3, RO)" exists and appears to be more comprehensive than the Policy.

A site visit conducted during the Resource Conservation and Recovery Act (RCRA) Facility Investigation at Technical Area (TA)-1049 (Los Alamos and Pueblo Canyons) revealed that the on-going activities for this TA may more closely follow the procedures defined in the SOP rather than those set forth in the Policy.

A conversation with Mr. Coby Muckelroy also led to the conclusion that the SOP may not be consistent with the RCRA investigation-derived waste regulations found in 40 Code of Federal Regulations (CFR) §262.40 through §262.11.

Therefore, based on the above three factors, I recommend that a more comprehensive review of LANL's management of IDW be conducted by comparing the SOP with the requirements of RCRA as codified in the CFR.

Teri,
the RCRA Inspector/Enforcement Program should be requested to assist w/ review of LANL's IDW Policy & SOP (specifically with respect to Part 262 regulatory concerns).
RAK

cc: Coby Muckelroy, Enforcement Program Manager

KH,
Please ask Ron if he wants you to follow thru up with a request to Coby for assistance. 7-1-96
70

TK



12780