



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

JUL 26 1984

Mr. Steven Asher, Director  
NM Environmental Improvement Division  
P. O. Box 968  
Santa Fe, NM 87504-0968

Attention: Mr. Greg Mello

Dear Mr. Asher:

The following information is provided in response to your "Notice of Violation" letter dated June 22, 1984. Some of the information is marked as draft material and when it has been reviewed and approved by DOE, Albuquerque, it will be forwarded to you in its final form.

Part One Item 1 - Request for a closure plan.

Enclosure 1 is a draft closure and post closure plan.

Part One Item 2 - Request for a post closure plan.

Enclosure 1 is a draft closure and post closure plan.

Part One Item 3 - Request for a copy of ground water monitoring program or waiver demonstration.

Enclosure 2 is a draft waiver demonstration request.

Part One Item 4<sup>OK</sup> - Request for more definition regarding descriptive categories in the biennial report.

Enclosure 3 is a revised biennial report.

Part One Item 5<sup>OK</sup> - Request to amend Part A to include lithium hydride storage area.

Enclosure 4 is a revised Part A.



16422

Mr. Steven Asher

-2-

Part One <sup>OK</sup> Item 6 - Statement that the 800 gallon container receiving plating waste does not have interim status for storage greater than ninety days.

No response necessary as we concur with your determination. The 800 gallon tank is identified in Part Two in Item 7 as the TA-3-40 plating tank.

Part One <sup>OK</sup> Item 7 - Statement that written waste analysis plan does not meet certain requirements.

Enclosure 5 is a draft waste analysis plan.

Part One <sup>OK</sup> Item 8 - Statement that a formal inspection plan does not exist for Area L or the treatment tank area in TA-50-1, and that inspection schedules and inspection logs must be submitted for treatment, storage (greater than ninety days) and disposal areas.

Enclosure 6 is the inspection schedules for Area L (TA-54), TA-3-40, TA-46, and TA-53 (ETL). The inspection schedules for TA-50-1 will be available when the unit becomes operational. *not enclosed, < 90 days, none needed* *< 90 days none needed*

Part One <sup>not included.</sup> Item 9 - Request for documentation regarding weekly inspection of storage areas of less than ninety days.

See enclosure 6.

Part One <sup>not enough.</sup> Item 10 - Request for documentation regarding annual training review.

Enclosure 7 is the requested documentation.

Part One <sup>OK</sup> Item 11 - Observation that a container awaiting disposal had two holes in the lid.

The lid was replaced.

Part One <sup>OK</sup> Item 12 - Request for an emergency equipment list to be provided to EID.

Enclosure 8 is the emergency equipment list.

Part One <sup>OK</sup> Item 13 - Statement that an accumulation date was not visible in a plating waste container.

Accumulation date tags are now affixed to containers in storage areas of less than ninety days.

Part Two <sup>OK</sup> Item 1 - Request for information regarding 4000 gallons of tank storage identified in the October 1983 revised Part A.

Mr. Steven Asher

-3-

Through a misunderstanding we were attempting to identify the total volume of storage that was estimated to exist at the Laboratory.

We have determined that no single tank or combination of tanks with a total volume of 4000 gallons used to storage waste exist at the Laboratory. **OK**

Part Two Item 2 - Request for a determination that radioactive lithium hydride stored at Area L meets the by-product material definition as contained in 10CFR30.4(d).

The radioactive lithium hydride meets the definition that you cited.

Part Two Item 3 - Request to determine if the waste sand at the HE burning area is hazardous.

The HE burning area has not been used since the area was recently maintained. After its next use the waste sand will be subjected to the EP toxicity test and the analytical results will be forwarded to you.

Part Two Item 4 - Statement that an 8250 gallon contained storage area shown on the October 1983 revised Part A did not meet interim status requirements. In addition, you requested a revised Part A.

Enclosure 4 is a revised Part A. The 8250 gallon area is a PCB storage area. The Laboratory currently does not store TSCA waste and RCRA waste in the same storage area. However, we intend to maintain this area as an emergency backup storage area for RCRA waste. We will notify you if RCRA wastes are stored in this area.

Part Two Item 5 - Statement that the improved batch treatment facility in TA-50-1 meets the requirements for interim status.

**OK** No response necessary

Part Two Item 6 - Questions concerning the description of TA-54 and the correct delineation of the area. The November 1980 Part A listed 100 surface acres and the October 1983 revised Part A listed 1600 acre-feet.

Both answers are correct. However, drawings are included with the revised Part A that shows the original 100 surface acres.

Part Two Item 7 - Request for a list of storage areas of less than ninety days along with a description of the waste.

The three areas are as follows:

<u>Location</u>	<u>Description</u>
TA-3-40	Plating tank waste
TA-46	Acid
TA-53	Cleaning solution solvents or acid

\* further action warranted.

what happened to the sand?

OK - but not for > 90 days

need delineation of 100 acres

generally OK

Mr. Steven Asher

-4-

Part Two Item 8 - Discussion concerning the "unlined<sup>unlined</sup> surface impoundment" at Area L and possible elimination of this form of treatment under interim authority.

At this time we are not prepared to process this certification required to delist the facility, because at some time in the future we may choose to this form of treatment

Part Two Item 9 - Discussion concerning the storage of waste for more than ninety days at Area G.

OK RCRA wastes are not stored for more than ninety days at Area G.

The information contained in this letter that is relevant to the enclosed revised Part A (Enclosure 4) should be considered as an addendum to the Part A.

The enclosures to this letter were reviewed by classification personnel and are subject to the following notice, "NOT FOR PUBLIC DISSEMINATION. THE DOCUMENT CONTAINS INFORMATION THAT MAY BE SUBJECT TO SECTION 148 OF THE ATOMIC ENERGY ACT, AS AMENDED." The material may be treated as a bound document. Enclosed is some specific information regarding the handling of material marked under Section 148.

We have tried to be responsive to your requests and if necessary will be happy to provide additional details. If you have any questions regarding this response please contact Mr. William Crismon at the letterhead address or call (505) 667-5288.

I appreciate your cooperation in this matter.

Sincerely,

  
Harold E. Valencia  
Area Manager

crs:07-24-84/0990A

Enclosures:  
As Stated

cc:  
William Taylor - EPA-Dallas, w/o encls.  
Allen Davis, EPA-Dallas, w/Rev. Part A  
C. E. Garcia, ES&H, ALO, w/encls.

not without  
a permit.  
(push) certif.  
inrel. to future  
use.  
Not on Pt. A. 1984  
was on Pt. A. 1980

OK





Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: \_\_\_\_\_ Rec'd by: \_\_\_\_\_

IX. FACILITY'S EPA I.D. NO.

T/A C

1 2 N M 0 8 9 0 0 1 0 5 1 5 13 14 15

X. GENERATOR'S EPA I.D. NO.

16 N M 0 8 9 0 0 1 0 5 1 5 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

Los Alamos National Laboratory

ON-SITE

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM  
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	1	WASTEWATER TREATMENT SLUDGE FROM EXPLOSIVE PRODUCTION	33 36 37 40 K 1 0 1 4 1 4	T 1 0 1 4	12 0 8 3 9	K
	2	BERYLLIUM	P 0 1 5	D 8 0	1 6 6 9	K
	3	ACETONE	U 0 0 2	D 8 0	2 2 3	K
	4	METHYLENE CHLORIDE	U 0 8 0	D 8 0	6 3 5	K
	5	NAPHTHALENE	U 1 6 5	D 8 0	6 1	K
	6	TOLUENE	U 2 2 0	D 8 0	12 8 1	K
	7	1,1,1 - TRICHLOROETHANE	U 2 2 6	D 8 0	3 1 8	K
	8	XYLENE	U 2 3 9	D 8 0	1 5 7	K
	9					
	10					
	11					
	12					

Tear out here

XV. COMMENTS (enter information by section number—see instructions)

Line #1 - T04 - Burned at explosives burn site