



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

RECEIVED

NOV 01 1984

NOV 1 1984

HAZARDOUS WASTE SECTION

Ms. Denise Fort, Director
New Mexico Environmental Improvement Division
P. O. Box 968
Santa Fe, New Mexico 87504-0968

RE: Notification of Violations (NOV) letter dated June 26, 1984

Dear Ms. Fort:

In response to the NOV referenced above, the New Mexico Environmental Improvement Division was provided with a detailed response dated July 26, 1984. Subsequently, members of my staff, the Albuquerque Operations staff, and the Laboratory staff met with members of your staff. The two most significant meetings were held on September 11 in Santa Fe, and on September 26, at the Laboratory. In addition, Mr. Souder met with the Laboratory staff on other occasions to discuss the Groundwater Monitoring Waiver documentation. As a result of those meetings, the staff agreed to provide additional material to augment the previously submitted material. I am enclosing the following material which we agreed to provide by November 1.

1. Revised Part A. This revision provides additional information regarding:
 - a. Amount of storage available.
 - b. Location of the burn pits at TA-16 and the estimated quantities of sand that may be removed on an annual basis. This is in reference to the material that we verbally disclosed to your staff at the September 26 meeting that met the definition of hazardous waste in accordance with the EP toxicity test. The past disposal area noted as "Area P" is also identified. Area P is scheduled to be characterized starting in July 1985, and lasting through September 1986.
 - c. Location of the pressure vessels and burn pads at TA-16.
 - d. Engineering details of the pressure vessels.
 - e. Engineering details of the burn pads.
 - f. Engineering details of the LiH storage area.



16427

- g. Engineering details of the batch waste treatment system.
 - h. Engineering details of Area L and the chemical storage facility.
 - i. Location drawings of the firing points at TA-14, -40, -15, -36, and -39.
2. Waste Characteristics and Analysis Plan. This revision provides additional information regarding:
- a. Blank samples of a waste analysis sheet, waste disposal request form, and waste disposal forms.
 - b. Examples of Laboratory analysis forms.
 - c. Representative inventory of Laboratory waste.
 - d. A waste segregation program.
 - e. A listing of waste analysis parameters and test methods.
 - f. A list of sampling methods.
3. Groundwater Monitoring Waiver Documentation. This revision includes discussions regarding vapor phase migration and vadose monitoring. Other material was provided to your staff after the September 26 meeting. A list of these materials was forwarded to you on October 25, 1984.
4. Training Matrix. This demonstrates the introductory level of training to be given to waste handlers by job class. Respirator and RCRA training will be given annually, and the other courses will be given in the form of refresher courses.
5. LA-6848-MS Report written by Margaret Anne Rogers, Volumes I and II.

In addition, we have agreed to provide additional information regarding Closure and Post Closure by December 1. We believe that with the December submission we will have provided all of the information that your staff requested in our meetings.

Ms. Denise Fort

- 3 -

NOV 1 1984

If you need additional information from us on the above, please let me know.

Sincerely,


Harold E. Valencia
Area Manager

cc:

C. S. Adams, Jr., ADTS, LANL, M.S. A120

Jesse Aragon, HSE-DO, LANL, M.S. P228

FORM 3 RCRA **EPA** **U.S. ENVIRONMENTAL PROTECTION AGENCY**
HAZARDOUS WASTE PERMIT APPLICATION
 Consolidated Permits Program
 (This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER
 F N M 0 8 9 0 0 1 0 5 1 5

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
73 74	75 76	77 78

B. REVISED APPLICATION (place an "X" below and complete Item I above)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

- AMOUNT - Enter the amount.
- UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
		UNIT OF MEASURE CODE			UNIT OF MEASURE CODE
GALLONS		G	LITERS PER DAY		V
LITERS		L	TONS PER HOUR		D
CUBIC YARDS		Y	METRIC TONS PER HOUR		W
CUBIC METERS		C	GALLONS PER HOUR		E
GALLONS PER DAY		U	LITERS PER HOUR		H
		UNIT OF MEASURE CODE			UNIT OF MEASURE CODE
ACRE-FEET		A	HECTARE-METER		F
HECTARE-METER		F	ACRES		B
ACRES		B	HECTARES		G
HECTARES		G			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

EXAMPLE DUP

LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	2300	G		7				
2					8				
3					9				
4					10				

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04") FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Discrete pieces of waste HE are collected, packaged, stored and burned at the TA-16 burning ground (see attached plan/topo sheets 2 and 5). This pad is designated 388 on the attached Structure Location Plan of TA-16. Two pressure vessels (401 and 406) are used to burn HE contaminated sludge from various processing facilities located around the Laboratory. The sludge is placed on layers of sand in the vessels, the water allowed to drain from the bottom of a NPDES discharge point. After the sludge is completely dried, the residue is burned.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
	1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))									
X-1	K	0	5	4	900	P	T	0	3	D	8	0				
X-2	D	0	0	2	400	P	T	0	3	D	8	0				
X-3	D	0	0	1	100	P	T	0	3	D	8	0				
X-4	D	0	0	2												included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W	N	M	0	8	9	0	0	1	0	5	1	5	T/A	C	1	W	DUP						T/A	C	2	DUP
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24			

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																			
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))															
25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48
1	D005	6	Y	D80																			Sand from clean out of explosives burn pits
2																							
3																							
4																							
5																							
6																							
7																							
8																							
9																							
10																							
11																							
12																							
13																							
14																							
15																							
16																							
17																							
18																							
19																							
20																							
21																							
22																							
23																							
24																							
25																							
26																							

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3

EPA ID NO. (enter from page 1)														
R	N	M	0	8	9	0	0	1	0	5	1	5	T/A	C
														6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)										
	3	5	4	9	0	5	1		1	0	6	1	4	0	1	5
	65	66	67	68	69	70	71		72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form-1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
United States Department of Energy										5 0 5 - 6 6 7 - 5 2 8 8									
3. STREET OR P.O. BOX										4. CITY OR TOWN				5. ST.		6. ZIP CODE			
Los Alamos Area Office										Los Alamos				N M		8 7 5 4 5			

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) Harold Valencia Los Alamos Area Office			B. SIGNATURE 			C. DATE SIGNED 11-1-84		
--	--	--	--	--	--	---------------------------	--	--

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) Christopher S. Adams, Jr. Associate Director Technical Support			B. SIGNATURE 			C. DATE SIGNED 10-31-84		
--	--	--	--	--	--	----------------------------	--	--

V. FACILITY DRAWING (see page 4)

The following drawings are attached:

ENG-R 5277 Sheets 2 & 5 - "S" Site showing location of burn pits area - also relationship of "S" Site to rest of Lab. TA-40 & TA-14 locations where HE waste may be destroyed.

TA-16 - Structure Location Plan - Structural designation of pressure vessels (401, 406) and burn pads (387, 388, 399)

ENG-C-27630 - Pressure Vessel (406)

ENG-C-25937 - pressure Vessel (401)

ENG-C-5849 - Burn Pads (387, 388, 399)

ENG-R 2579 - SM102, RM. 118A, LiH storage area

LA-RV-1-13.1 and LA-RV-P-9 - Batch Waste Treatment System at TA-50-1

Area L Chemical Storage Facility, TA-54

Area L Chemical Storage Facility, shed

ENG-R-5277 Sheet 10 - TA-15 and TA-36 - firing points where HE waste may be destroyed

ENG-R-5277 Sheet 11 - TA-39 firing points where HE waste may be destroyed

ENG-R-5277 Sheet 5 - TA-14 and TA-40 firing points where HE waste may be destroyed

See sheet 5 of drawing 101