

memorandum

TO: SMG

DATE: May 7, 1992

FROM: James F. Jackson 

MAIL STOP/TELEPHONE: A101/7-4168

SYMBOL: DD

SUBJECT: **FURTHER DIRECTIVE ON SUSPENSION OF CERTAIN MIXED-WASTE GENERATING OPERATIONS**

We are constrained by environmental regulations and DOE directives to "cease the generation of any mixed waste stream which does not have a currently available treatment option by May 8, 1992." This communication will serve to implement that directive at the Laboratory. As of May 8 at 8:00 a.m., we will discontinue processes that generate mixed wastes that would be stored in violation of the Land Disposal Restrictions. It will be the responsibility of line management to see that this directive is communicated to appropriate workers. We view this as a temporary suspension to comply with federal law. We will be working on all fronts to establish a compliance agreement with EPA that will allow us to manage our mixed waste appropriately.

SPECIFIC CASES

Leaded Gloves

Activities involving management of special nuclear materials and handling of transuranic wastes require extensive use of leaded gloves. The gloves, as they fail, will be replaced with standard gloves. Other precautions will be taken to minimize radiation exposure.

Liquid Waste Treatment Plant

The Liquid Waste Treatment Plant (LWTP), TA-50, is currently operating in a "pure radioactive waste mode," i.e., we believe that there are no hazardous wastes or constituents in the influent stream other than acid and caustic solutions in the appropriate lines. Hazardous wastes and constituents are those defined by EPA. Organic solvents and heavy metals are the ones typically generated at the Laboratory. We have recently initiated a 24-hour sampling program to verify that situation. It is important that the system continue to operate in that mode.

ABSOLUTELY no materials are to be introduced into the radioactive liquid waste ("acid waste") system that are listed as hazardous constituents except for appropriate acid or caustic solutions that do not contain any other characteristic hazardous materials. To do so would create mixed waste within the LWTP sludge and force suspension of operations. Positive steps (e.g., warning signs) will be taken to help ensure that hazardous materials are not inadvertently introduced.



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Cases Involving Health and Safety

The bioassay and industrial hygiene analyses must continue to protect our employees. However, the mixed waste generated by these analyses should be included in the new contracts with external treatment vendors when those contracts become effective. The scintillation counter liquids fall in the same category.

Programmatic Impact Cases

Processes that produce mixed waste must be suspended unless the mixed waste can be processed by an external contractor. An example of possible activities in this category are:

- LS Division scintillation liquids and gels.
- Wastes associated with the fabrication of hydrodynamic test assemblies.

Alternative Processes

There are several candidates for this category. Each process that currently generates mixed waste will be re-examined to determine whether alternatives can be implemented.

It is important that we all understand that these measures are temporary. Every effort is being made to develop alternatives to allow you to carry out your work.

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