



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

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FYI
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File Ref

MAY 20 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

MAY 24 1993

Benito Garcia, Acting Bureau Chief
Hazardous and Radioactive Waste Bureau
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Garcia:

During the past year, the staffs of the Department of Energy (DOE) and the Los Alamos National Laboratory (LANL) have been conducting extensive analyses of data gathered during the past 23 years on radioactive waste in support of developing a compliance agreement (CA) on the land disposal restrictions for mixed waste. The results of these analyses are reflected in the mixed waste inventories reported in Appendix II of the draft CA and the 180-day report sent to the Environmental Protection Agency on April 19, 1993, as required by the Federal Facilities Compliance Act. As a result of this effort, approximately 1,200 containers of Transuranic (TRU) waste stored at Technical Area 54, Area G, Building 48 have been re-classified as mixed waste. The LANL Waste Management Group completed re-labelling their containers on May 6, 1993, and updates to the operating records are ongoing. The containers affected by this classification have been managed consistent with Resource Conservation and Recovery Act (RCRA) container storage requirements since 1986 (e.g., weekly inspections, proper aisle spacing and container maintenance). I have enclosed two photographs to show how these containers are being managed.

In order to determine which TRU waste streams should be classified as mixed waste, process reviews and interviews were performed in the summer and fall of 1992 to identify probable hazardous waste constituents. Where hazardous waste constituents were suspected, waste streams were classified as mixed waste with corresponding hazardous waste codes. We believe that the majority of waste affected by this classification does not actually contain hazardous waste constituents. However, because the content of a waste stream may have varied from time to time, wherever there was any suspicion of hazardous waste constituents, the whole waste stream was classified as mixed waste. For example, a waste

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stream may represent several hundred containers of which a few may contain lead scrap. Until sufficient information is developed to determine which containers actually hold lead, the entire waste stream will be managed as lead-containing TRU mixed waste. DOE and LANL are currently developing plans for construction of a facility to characterize and treat waste destined for the Waste Isolation Pilot Project in order to meet the facility's waste acceptance criteria. Once this facility is constructed, LANL will perform chemical and physical analyses of TRU waste to determine which containers are mixed wastes.

LANL instituted a comprehensive waste profiling system which provides information required by RCRA for characterizing waste. Hence, waste recently placed in storage have been characterized to meet RCRA hazardous waste management requirements.

If you have any questions regarding this matter, please contact Jon Mack of my staff at 665-5026.

Sincerely,


for Herman C. Le-Doux
Deputy Area Manager

LESH:9JM-021

Enclosures:
Photographs

cc w/o enclosures:
Juan Corpion,
(EM-8:93-1295-1), EM-8
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