



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

**FEB 18 1994**

Mr. Ed Horst  
Enforcement Program Manager  
Radioactive and Hazardous Waste Bureau  
New Mexico Environment Department  
525 Camino de los Marquez  
Santa Fe, NM 87502

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Dear Mr. Horst:

As you are aware through recent phone and personal communications with the Department of Energy (DOE) and University of California (UC) staff, the Los Alamos National Laboratory (LANL) Environmental Restoration Program is in the investigative phase of remediating suspect past disposal sites (Solid Waste Management Units [SWMUs] and Areas of Concern [AOCs]). LANL would like to stress that the SWMUs and AOCs which are now located off-site were once owned and operated by DOE or its predecessor, the Atomic Energy Commission. To determine if any impact to the environment has occurred, LANL must conduct investigations at these SWMUs per Module VIII of the LANL Hazardous Waste Permit. The type of investigations to be conducted include surface soil sampling, sediment sampling, radiation screening, geophysical surveys, subsurface drilling, trenching, etc.

Investigation activities will result in the production of investigation waste. Such waste is comprised of disposable, non-repairable, and contaminated sampling equipment; personal protective equipment; decontamination waste-waters; excess drill cuttings; sanitary wastes, etc.

Investigations at off-site locations present a waste management problem. Due to the proximity of many of the units to public places (i.e., motels, restaurants, city side walks, private homes) LANL prefers to transport any wastes generated onto LANL property where it can be best managed. This is the most protective measure in case the waste generated is found to be hazardous. LANL has submitted and continues to work with the New Mexico Environment Department (NMED) on a permit modification as a permanent solution to this problem. However, since that solution is still some time off, an interim solution to this problem is needed so that the investigative phase of these projects can continue.

In recent conversations between NMED, DOE, and UC, a temporary solution to this waste management problem has been found. It has been proposed that LANL will contact NMED to obtain a provisional generator identification number. This number will be written on waste manifests to transfer the investigation derived waste to a less-than-ninety-day storage area on LANL property.



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Ed Horst

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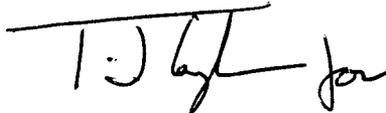
FEB 18 1994

The provisional identification number will allow LANL to proceed with field investigations. One number per location for the duration of the investigation will be assigned by NMED based upon a phone communication from a LANL representative. This activity will be coordinated with NMED prior to the generation of any waste. All wastes generated will be properly managed at a less-than-ninety-day storage area. Upon receipt of analytical results, the waste will be stored, treated, and disposed as appropriate.

DOE and UC appreciate the willingness of NMED to find a temporary solution to this matter. LANL will submit maps illustrating the locations of all SWMUs and AOCs as discussed on February 16, 1994. This information will be provided to support LANL's previously submitted request for a Class 1 Permit Modification for LANL to receive waste generated off-site as a result of corrective action investigations.

To confirm the above conversations on this issue please sign the signature block provided at the bottom of this letter and return the letter to Jon Mack of the Los Alamos Area Office. If you should have any questions concerning this letter please feel free to contact Jon at 665-5026.

Sincerely,



Joseph C. Vozella, Chief  
Environment, Safety, and Health  
Branch

LESH:7JM-121

cc:

K. Hargis, ESH-8, LANL,  
MS-K490  
J. White, ESH-8, LANL,  
MS-K498  
J. Ellvinger, ESH-8  
(ESH-8/HSWS-94-0078-1),  
LANL, MS-K498  
D. McInroy, EMP, LANL,  
MS-M992  
P. Shanley, ESH-8, LANL,  
MS-K498

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Ed Horst, Enforcement Program Manager

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Date