



State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

JUDITH M. ESPINOSA
SECRETARY

BRUCE KING
GOVERNOR

RON CURRY
DEPUTY SECRETARY

March 14, 1994

Joseph C. Vozella, Chief
Environment, Safety, and Health Branch
U.S. Department of Energy
Los Alamos Area Office
Los Alamos, New Mexico 87544

Dear Mr. Vozella:

The Hazardous and Radioactive Materials Bureau (HRMB) is in receipt of your February 18, 1994 letter concerning investigation waste that will be generated through DOE/LANL's investigative activities at past disposal sites throughout the area of the laboratories and townsite. As stated in your letter, the type of investigations to be conducted include surface soil sampling, sediment sampling, radiation screening, geophysical surveys, subsurface drilling, trenching, etc. HRMB must be notified of any wastes that would be generated in addition to those specifically listed in your letter, i.e. in the "etc." category, prior to their disposition. HRMB concurs with the concept of the proposed investigative/sampling waste handling approach. However, this approach fails to address the possibility of Land Disposal Restricted (LDR) waste during these sampling and investigative events.

HRMB stresses that once analytical results show that any of these wastes are hazardous waste, DOE/LANL must make arrangements with facilities that can receive off-site hazardous waste. Also, please be aware that provisional numbers are assigned to a specific location for each off-site shipment. If more than one shipment is necessary, then additional provisional numbers will be required for that location. HRMB also stresses that this approach is for small volumes of waste generated during these investigative/sampling events and not for waste streams of any significant volume.

Please do not hesitate to contact our office if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Coby Muckelroy".

Coby Muckelroy
Acting RCRA Inspection/Enforcement Program Manager
Hazardous and Radioactive Materials Bureau



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