Coby

Benito
Susan McM
xc

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

RECEIVED
SEP 29 1994
NM ENVIRONMENT DEPARTMENT
OFFICE OF THE SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Kathleen Sisneros, Director
Water and Waste Management Division
New Mexico Environment Department
P. O. Box 26110
Santa Fe, NM 87502

Dear Ms. Sisneros:

This letter is in response to the action ordered in #3 of Compliance Order (CO) 94-09. This Order requires the Respondent to initiate measures to conduct an adequate hazardous waste determination on wastes identified in Conclusions 68-73 of the CO and report the status of these measures within 15 working days. To date, all referenced wastes have been adequately characterized. An explanation of each waste cited in Conclusions 68-73 is described below.

68. Upon receipt of the CO, the hazardous waste determination effort pertaining to this waste was reviewed. This review indicated that according to the Environmental Protection Agency's Test Methods for Evaluating Solid Waste (SW-846) guidance, adequate representative samples were collected and analyzed, and the Toxic Characteristic Leaching Procedure values detected were below regulatory limits defining hazardous waste.

69. Upon receipt of the CO, the hazardous waste determination effort pertaining to this waste was reviewed. This review indicated that a request for analysis of the waste was submitted on August 30, 1993. Based on the results of this analysis, the waste was assigned the RCRA waste codes D002, D006, D007, and D008.

70. Upon receipt of the CO, the hazardous waste determination effort pertaining to this waste was reviewed. This review indicated that since 1990, the Respondent has performed a toxic metal analysis on each batch of treatment sludge generated at Technical Area 50, Building 1. The concentrations contained in the resultant sludge were significantly below regulatory limits defining hazardous waste.

16597

71. Upon receipt of the CO, the hazardous waste determination effort pertaining to this waste was reviewed. This review indicated that the waste had been characterized and a Waste Profile Form completed on June 17, 1993, prior to the August inspection.

72. Upon receipt of the CO, the hazardous waste determination effort pertaining to this waste was reviewed. This review indicated that all but four of the referenced gas cylinders have been sampled, analyzed, and hazardous waste determinations made. Of the four remaining cylinders, two have frozen valves which will complicate the sampling process due to concern for worker safety, as well as difficulties associated with freeing the frozen valves. The following schedule applies to the remaining four cylinders.

    - Sample two cylinders with "free" valves within fourteen working days. Sampling will be conducted by LANL's Gas Analysis Laboratory at CST-1, and upon receipt of analytical data, hazardous waste determinations will be made.

    - Conduct non-intrusive radiological determinations on two cylinders with frozen valves within fourteen working days. Based on radiological analyses, develop a sample work-off plan delineating sample procedures. Sample work-off plan will be completed within 30 working days of completion of radiological determinations. Actual sampling will be conducted based on schedule developed in sample work-off plan. Upon receipt of analytical data, hazardous waste determinations will be made.

73. Upon receipt of the CO, the hazardous waste determination effort pertaining to this waste was reviewed. This review indicated that the waste was analyzed on December 10, 1993.

Should you have any questions regarding this matter, please contact Jon Mack of my staff at (505) 665-5026.

Sincerely,

Joseph C. Vozella
Acting Assistant Area Manager
Office of Environment and Projects

LAAMEP:2JM-009

AUTHORIZED WASTES

PERMIT ATTACHMENT G

NM0890010515-1

Continued from page 4.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

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FOR OFFICIAL ONLY

EPA I.D. NUMBER (enter from page 1): NMD989001515

W DUP 13 DUP

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.)
1	D001	100,000	P	S01	T03			
2	D002	320,000	P	S01	T01			
3	D003	35,000	P	S01	T01	T04		Reacted at TA-16 (See III C.)
4	D003	5,000	P	S01		T01		Lithium Hydride only +
5	D004	2,000	P	S01	T01			
6	D005	60,000	P	S01	S02	T01		Sand from cleanout of explosive burn pads.
7	D006	1,000	P	S01	T01			
8	D007	1,500	P	S01	T01			
9	D008	50,000	P	S01	T01			May contain other metals (D004-D011)
10	D009	15,000	P	S01	T01			
11	D010	7500	P	S01	T01			
	D011	7500	P	S01	T01			
13	D012	1000	P	S01	T03			
14	D016	1,000	P	S01	T03			
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EPA Form 3510-3 (6-80)

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

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EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
W N M D 0 8 9 0 0 1 0 5 1 5	W DUP	2 DUP

D. DESCRIPTION OF HAZARDOUS WASTES (continued)

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)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D.1.)
1	F001	10,000	P	S01 S02 T03 T04	Solidified if treatment standards are met
2	F002	75,000	P	S01 S02 T03 T04	
3	F003	150,000	P	S01 S02 T03 T04	
4	F004	500#	P	S01 T03	
5	F005	15,000	P	S01 S02 T03 T04	
6	F006	500#	P	S01 T01	
7	F007	12,500	P	S01 T01	
8	F008	1,000	P	S01 T01	
9	F009	6,000	P	S01 T01	
10	F027	700	P	S01 T03	
11	F028	700	P	S01 T03	
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NOTE: Photocopy this page before continuing if you need more.

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 — 1	W DUP — 2 DUP

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)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	K044	20,000	P	S01T04	
2	K047	500*	P	S01T04	
3	K045	2,000	P	S01T04	+
4		END. OF DESIGNATOR			
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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	W DUP	DUP

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.)
1	P001	1,000	P	S01T03	
2	P002	1,000	P	S01T03	
3	P003	1,000	P	S01T03	
4	P004	1,000	P	S01T03	
5	P005	1,000	P	S01T03	
6	P006	1,000	P	S01T04	
7	P007	1,000	P	S01T03	
8	P008	1,000	P	S01T03	
9	P009	1,000	P	S01T04	
10	P010	1,000	P	S01	
11	P011	1,000	P	S01	
12	P012	1,000	P	S01	
13	P013	1,000	P	S01T01	
14	P014	1,000	P	S01T03	
15	P015	1,000	P	S01	
16	P016	1,000	P	S01T03	
17	P017	1,000	P	S01T03	
18	P018	1,000	P	S01T03	
19	P020	1,000	P	S01T03	
20	P021	1,000	P	S01T01	
21	P022	1,000	P	S01T04	
22	P023	1,000	P	S01T03	
23	P024	1,000	P	S01T03	
24	P026	1,000	P	S01T03	
25	P027	1,000	P	S01T03	
26	P028	1,000	P	S01T03	

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Continued from page 2.
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FOR OFFICIAL USE ONLY

EPA I.D. NUMBER (enter from page 1)		FOR OFFICIAL USE ONLY	
N M 0 8 9 0 0 1 0 5 1 5		W DUP	2 DUP

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)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D.1.)
1	P 0 2 9	500*	P	S 0 1	T 0 1			
2	P 0 3 0	500*	P	S 0 1	T 0 1			
3	P 0 3 1	500*	P	S 0 1	T 0 4	T 0 3		
4	P 0 3 3	500*	P	S 0 1	T 0 4	T 0 3		
5	P 0 3 4	500*	P	S 0 1	T 0 3			
6	P 0 3 6	500*	P	S 0 1	T 0 3			
7	P 0 3 7	500*	P	S 0 1	T 0 3			
8	P 0 3 8	500*	P	S 0 1	T 0 3			
9	P 0 3 9	500*	P	S 0 1	T 0 3			
10	P 0 4 0	500*	P	S 0 1	T 0 3			
[illegible]	P 0 4 1	500*	P	S 0 1	T 0 3			
12	P 0 4 2	500*	P	S 0 1	T 0 3			
13	P 0 4 3	500*	P	S 0 1	T 0 3			
14	P 0 4 4	500*	P	S 0 1	T 0 3			
15	P 0 4 5	500*	P	S 0 1	T 0 3			
16	P 0 4 6	500*	P	S 0 1	T 0 3			
17	P 0 4 7	500*	P	S 0 1	T 0 3			
18	P 0 4 8	500*	P	S 0 1	T 0 3			
19	P 0 4 9	500*	P	S 0 1	T 0 3			
20	P 0 5 0	500*	P	S 0 1	T 0 3			
21	P 0 5 1	500*	P	S 0 1	T 0 3			
22	P 0 5 4	500*	P	S 0 1	T 0 1	T 0 4	T 0 3	
23	P 0 5 6	500*	P	S 0 1				
[illegible]	P 0 5 7	500*	P	S 0 1	T 0 3			
25	P 0 5 8	500*	P	S 0 1				
26	P 0 5 9	500*	P	S 0 1	T 0 3			

CONTINUE ON REVERSE

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EPA I.D. NUMBER (enter from page 1): W N M 0 8 9 0 0 1 0 5 1 5

FOR OFFICIAL USE ONLY: W DUP 2 DUP

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)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D.1.)
1	P060	500*	P	S01 T03	
2	P062	500*	P	S01 T03	
3	P063	500*	P	S01 T03 T04	
4	P064	500*	P	S01 T03 T04	
5	P065	500*	P	S01 T04	
6	P066	500*	P	S01 T03	
7	P067	500*	P	S01 T03	
8	P068	500*	P	S01 T03	
9	P069	500*	P	S01 T03 T04	
10	P070	500*	P	S01 T03	
11	P071	500*	P	S01 T03 T04	
12	P072	500*	P	S01 T03	
13	P073	500*	P	S01 T01 T04	
14	P074	500*	P	S01 T01	
15	P075	500*	P	S01 T03	
16	P076	500*	P	S01 T01 T04	
17	P077	500*	P	S01 T03 T04	
18	P078	500*	P	S01 T01	
19	P081	500*	P	S01 T04	
20	P082	500*	P	S01 T03	
21	P084	500*	P	S01 T03	
22	P085	500*	P	S01 T03	
23	P087	500*	P	S01	
24	P088	500*	P	S01 T03	
25	P089	500*	P	S01 T03	
26	P092	500*	P	S01 T03	

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EPA I.D. NUMBER (enter from page 1)		
N M D 9 0 1 0 5 1 5 1 1	W	DUP 1 2 DUP

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)
1	F 0 9 3	500*	P	S 0 1	T 0 3			
2	F 0 9 4	500*	P	S 0 1	T 0 3			
3	F 0 9 5	500*	P	S 0 1	T 0 3			
4	F 0 9 6	500*	P	S 0 1	T 0 3	T 0 4		
5	F 0 9 7	500*	P	S 0 1	T 0 3			
6	F 0 9 8	500*	P	S 0 1	T 0 1			
7	F 0 9 9	500*	P	S 0 1	T 0 1			
8	F 1 0 1	500*	P	S 0 1	T 0 3			
9	F 1 0 2	500*	P	S 0 1	T 0 3			
10	F 1 0 3	500*	P	S 0 1	T 0 3			
11	F 1 0 4	500*	P	S 0 1	T 0 1			
12	F 1 0 5	500*	P	S 0 1				
13	F 1 0 6	500*	P	S 0 1	T 0 1			
14	F 1 0 7	500*	P	S 0 1	T 0 4			
15	F 1 0 8	500*	P	S 0 1	T 0 3			
16	F 1 0 9	500*	P	S 0 1	T 0 3			
17	F 1 1 0	500*	P	S 0 1	T 0 3			
18	F 1 1 1	500*	P	S 0 1	T 0 3			
19	F 1 1 2	500*	P	S 0 1	T 0 3	T 0 4		
20	F 1 1 3	500*	P	S 0 1	T 0 1			
21	F 1 1 4	500*	P	S 0 1	T 0 1			
22	F 1 1 5	500*	P	S 0 1	T 0 1			
23	F 1 1 6	500*	P	S 0 1	T 0 3			
24	F 1 1 8	500*	P	S 0 1	T 0 3			
25	F 1 1 9	500*	P	S 0 1				
26	F 1 2 0	500*	P	S 0 1				

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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	W DUP 2 DUP

IV DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter codes)	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.)
1	P 1 2 1	1,000	P	S 0 1 T 0 1	
2	P 1 2 2	1,000	P	S 0 1 T 0 4	
3	P 1 2 3	1,000	P	S 0 1 T 0 3	
4		END OF P DESIGNATOR 1,000			
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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	W DUP 2 DUP

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)
1	U001	500*	P	S01	T03			
2	U002	1000	P	S01	T03			
3	U003	500*	P	S01	T03			
4	U004	500*	P	S01	T03			
5	U005	500*	P	S01	T03			
6	U006	500*	P	S01	T04	T03		
7	U007	500*	P	S01	T03			
8	U008	500*	P	S01	T03	T04		
9	U009	500*	P	S01	T03			
10	U010	500*	P	S01	T03			
11	U011	500*	P	S01	T03			
12	U012	500*	P	S01	T03			
13	U014	500*	P	S01	T03			
14	U015	500*	P	S01	T03			
15	U016	500*	P	S01	T03			
16	U017	500*	P	S01	T03			
17	U018	500*	P	S01	T03			
18	U019	1000	P	S01	T03			
19	U020	500*	P	S01	T03	T04		
20	U021	500*	P	S01	T03			
21	U022	500*	P	S01	T03			
22	U023	500*	P	S01	T03	T04		
23	U024	500*	P	S01	T03			
24	U025	500*	P	S01	T03			
25	U026	500*	P	S01	T03			
26	U027	500*	P	S01	T03			

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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	W DUP	DUP

19. 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)
1	U028	1,000	P	S01	T03			
2	U029	1,000	P	S01	T03			
3	U030	1,000	P	S01	T03			
4	U031	1,000	P	S01	T03			
5	U032	1,000	P	S01	T01			
6	U033	1,000	P	S01	T04			
7	U034	1,000	P	S01	T03			
8	U035	1,000	P	S01	T03			
9	U036	1,000	P	S01	T03			
10	U037	1,000	P	S01	T03			
11	U038	1,000	P	S01	T03			
12	U039	1,000	P	S01	T03			
13	U041	1,000	P	S01	T03			
14	U042	1,000	P	S01	T03	T04		
15	U043	1,000	P	S01	T03	T04		
16	U044	1000	P	S01	T03			
17	U045	1,000	P	S01	T03	T04		
18	U046	1,000	P	S01	T03			
19	U047	1,000	P	S01	T03			
20	U048	1,000	P	S01	T03			
21	U049	1,000	P	S01	T03			
22	U050	1,000	P	S01	T03			
23	U051	1,000	P	S01	T03			
24	U052	1,000	P	S01	T03			
25	U053	1,000	P	S01	T03			
26	U055	1,000	P	S01	T03			

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EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W N H 0 8 9 0 0 1 0 5 1 5 1 1	W DUP 1 DUP

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)
1	U056	500*	P	S01T03	
2	U057	500*	P	S01T03	
3	U058	500*	P	S01T03	
4	U059	500*	P	S01T03	
5	U060	500*	P	S01T03	
6	U061	500*	P	S01T03	
7	U062	500*	P	S01T03	
8	U063	500*	P	S01T03	
9	U064	500*	P	S01T03	
10	U066	500*	P	S01T03	
11	U067	500*	P	S01T03	
12	U068	500*	P	S01T03	
13	U069	500*	P	S01T03	
14	U070	500*	P	S01T03	
15	U071	500*	P	S01T03	
16	U072	500*	P	S01T03	
17	U073	500*	P	S01T03	
18	U074	500*	P	S01T03	
19	U075	500*	P	S01	
20	U076	500*	P	S01T03	
21	U077	500*	P	S01T03	
22	U078	500*	P	S01T03	
23	U079	500*	P	S01T03	
	U080	1000	P	S01T03	
25	U081	500*	P	S01T03	
26	U082	500*	P	S01T03	

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EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
N M 0 8 9 0 0 1 0 5 1 5	W DUP	2 DUP

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)
1	U083	500*	P	S01	T03			
2	U084	500*	P	S01	T03			
3	U085	500*	P	S01	T03			
4	U086	500*	P	S01	T03			
5	U087	500*	P	S01	T03			
6	U088	500*	P	S01	T03			
7	U089	500*	P	S01	T03			
8	U090	500*	P	S01	T03			
9	U091	500*	P	S01	T03			
10	U092	500*	P	S01	T04	T03		
11	U093	500*	P	S01	T03			
12	U094	500*	P	S01	T03			
13	U095	500*	P	S01	T03			
14	U096	500*	P	S01	T03			
15	U097	500*	P	S01	T03			
16	U098	500*	P	S01	T03			
17	U099	500*	P	S01	T03			
18	U101	500*	P	S01	T03			
19	U102	500*	P	S01	T03			
20	U103	500*	P	S01	T03			
21	U105	500*	P	S01	T03			
22	U106	500*	P	S01	T03			
23	U107	500*	P	S01	T03			
24	U108	500*	P	S01	T03			
25	U109	500*	P	S01	T03			
26	U110	500*	P	S01	T03			

CONTINUE ON REVERSE

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

Form Approved OMB No. 158-S80004

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	W DUP 2 DUP

V. 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))
1	U 1 1 1	500*	P	S 0 1	T 0 3			
2	U 1 1 2	500*	P	S 0 1	T 0 3	T 0 4		
3	U 1 1 3	500*	P	S 0 1	T 0 3	T 0 4		
4	U 1 1 4	500*	P	S 0 1	T 0 3			
5	U 1 1 5	500*	P	S 0 1	T 0 3	T 0 4		
6	U 1 1 6	500*	P	S 0 1	T 0 3			
7	U 1 1 7	500*	P	S 0 1	T 0 3	T 0 4		
8	U 1 1 8	500*	P	S 0 1	T 0 3	T 0 4		
9	U 1 1 9	500*	P	S 0 1	T 0 3			
10	U 1 2 0	500*	P	S 0 1	T 0 3			
11	U 1 2 1	500*	P	S 0 1				
2	U 1 2 2	1000	P	S 0 1	T 0 3			
13	U 1 2 3	500*	P	S 0 1	T 0 3			
14	U 1 2 4	500*	P	S 0 1	T 0 3			
15	U 1 2 5	500*	P	S 0 1	T 0 3			
16	U 1 2 6	500*	P	S 0 1	T 0 3			
17	U 1 2 7	500*	P	S 0 1	T 0 3			
18	U 1 2 8	500*	P	S 0 1	T 0 3			
19	U 1 2 9	500*	P	S 0 1	T 0 3			
20	U 1 3 0	500*	P	S 0 1	T 0 3			
21	U 1 3 1	500*	P	S 0 1	T 0 3			
22	U 1 3 2	500*	P	S 0 1	T 0 3			
23	U 1 3 3	500*	P	S 0 1	T 0 3	T 0 4		
4	U 1 3 4	10,000	P	S 0 1	T 0 1			
25	U 1 3 5	500*	P	S 0 1	T 0 4	T 0 3	T 0 1	
26	U 1 3 6	500*	P	S 0 1	T 0 3			

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Continued from page 2.
NOTE: Photocopy this page before continuing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S20

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	W DUP 2 DUP

14. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter codes)	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.)
1	U137	1,000	P	S01 T03	
2	U138	1,000	P	S01 T03	
3	U139	1,000	P	S01 T03	
4	U140	1,000	P	S01 T03	
5	U141	1,000	P	S01 T03	
6	U142	1,000	P	S01 T03	
7	U143	1,000	P	S01 T03	
8	U144	1,000	P	S01	
9	U145	1,000	P	S01	
10	U146	1,000	P	S01	
11	U147	1,000	P	S01 T03	
12	U148	1,000	P	S01 T03	
13	U149	1,000	P	S01 T03	
14	U150	1,000	P	S01 T03	
15	U151	1,000	P	S01	
16	U152	1,000	P	S01 T03	
17	U153	1,000	P	S01 T03	
18	U154	1,000	P	S01 T03	
19	U155	1,000	P	S01 T03	
20	U156	1,000	P	S01 T03	
21	U157	1000	P	S01 T03	
22	U158	1,000	P	S01 T03	
23	U159	1000	P	S01 T03	
24	U160	1,000	P	S01 T03 T04	
25	U161	1,000	P	S01 T03	
26	U162	1,000	P	S01 T03	

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

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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	W DUP	2 DUP

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.)
1	U163	500*	P	S01 T03	
2	U164	500*	P	S01 T03	
3	U165	500*	P	S01 T03	
4	U166	500*	P	S01 T03	
5	U167	500*	P	S01 T03	
6	U168	500*	P	S01 T03	
7	U169	500*	P	S01 T03	
8	U170	500*	P	S01 T03	
9	U171	500*	P	S01 T03	
10	U172	500*	P	S01 T03	
11	U173	500*	P	S01 T03	
12	U174	500*	P	S01 T03	
13	U176	500*	P	S01 T03	
14	U177	500*	P	S01 T03	
15	U178	500*	P	S01 T03	
16	U179	500*	P	S01 T03	
17	U180	500*	P	S01 T03	
18	U181	500*	P	S01 T03	
19	U182	500*	P	S01 T03	
20	U183	500*	P	S01 T03	
21	U184	500*	P	S01 T03	
22	U185	500*	P	S01 T03	
23	U186	500*	P	S01 T03	
24	U187	500*	P	S01 T03	
25	U188	1000	P	S01 T03	
26	U189	500*	P	S01 T04 T03	

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CONTINUE ON REV.

Continued from page 2

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

Form Approved OMB No. 158-S80004

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	W DUP	DUP

V. 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)
1	U190	500*	P	S01	T03			
2	U191	500*	P	S01	T03			
3	U192	500*	P	S01	T03			
4	U193	500*	P	S01	T03			
5	U194	500*	P	S01	T03			
6	U196	500*	P	S01	T03			
7	U197	500*	P	S01	T03			
8	U200	500*	P	S01	T03			
9	U201	500*	P	S01	T03			
10	U202	500*	P	S01	T03			
11	U203	500*	P	S01	T03			
12	U204	500*	P	S01				
13	U205	500*	P	S01	T04			
14	U206	500*	P	S01	T03			
15	U207	500*	P	S01	T03			
16	U208	500*	P	S01	T03			21
17	U209	500*	P	S01	T03			
18	U210	500*	P	S01	T03			
19	U211	1000	P	S01	T03			
20	U212	500*	P	S01	T03			
21	U213	500*	P	S01	T03	T04		
22	U214	500*	P	S01	T03			
23	U215	500*	P	S01				
24	U216	500*	P	S01				
25	U217	500*	P	S01	T04			
26	U218	500*	P	S01	T03			

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Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

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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	W DUP 1 2 DUP

V. 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.)
1	U 2 1 9	500*	P	S 0 1 T 0 3	
2	U 2 2 0	1000	P	S 0 1 T 0 3	
3	U 2 2 1	500*	P	S 0 1 T 0 3	
4	U 2 2 2	500*	P	S 0 1 T 0 3	
5	U 2 2 3	1000	P	S 0 1 T 0 3	
6	U 2 2 5	500*	P	S 0 1	
7	U 2 2 6	1500	P	S 0 1 T 0 3	
8	U 2 2 7	500*	P	S 0 1 T 0 3	
9	U 2 2 8	2000	P	S 0 1 T 0 3	
10	U 2 3 0	500*	P	S 0 1 T 0 3	
11	U 2 3 1	500*	P	S 0 1 T 0 3	
12	U 2 3 2	500*	P	S 0 1 T 0 3	
13	U 2 3 3	500*	P	S 0 1 T 0 3	
14	U 2 3 4	500*	P	S 0 1 T 0 4 T 0 3	
15	U 2 3 5	500*	P	S 0 1 T 0 3	
16	U 2 3 6	500*	P	S 0 1 T 0 3	
17	U 2 3 7	500*	P	S 0 1 T 0 3	
18	U 2 3 8	500*	P	S 0 1 T 0 3	
19	U 2 3 9	1000	P	S 0 1 T 0 3	
20	U 2 4 0	500*	P	S 0 1 T 0 3	
21	U 2 4 2	500*	P	S 0 1 T 0 3	
22	U 2 4 3	500*	P	S 0 1 T 0 3	
23	U 2 4 4	500*	P	S 0 1 T 0 3	
24	U 2 4 6	500*	P	S 0 1	
25	U 2 4 7	500*	P	S 0 1 T 0 3	
26	U 2 4 8	500*	P	S 0 1 T 0 3	

CONTINUE ON REVERSE

NOTE: Photocopy this page before completing it.

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	W DUP 2 DUP

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)				D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U 2 4 9	500*	P	S 0 1				
2	U 3 2 6	500*	P	S 0 1	T 0 3			
3	U 3 5 3	500*	P	S 0 1	T 0 3			+
4	U 3 5 9	500*	P	S 0 1	T 0 3			
5								
6								
7								
8								
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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	W DUP DUP

V. 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.)
1	U190	500#	P	S01 T03	
2	U191	500#	P	S01 T03	
3	U192	500#	P	S01 T03	
4	U193	500#	P	S01 T03	
5	U194	500#	P	S01 T03	
6	U196	500#	P	S01 T03	
7	U197	500#	P	S01 T03	
8	U200	500#	P	S01 T03	
9	U201	500#	P	S01 T03	
10	U202	500#	P	S01 T03	
11	U203	500#	P	S01 T03	
12	U204	500#	P	S01	
13	U205	500#	P	S01 T04	
14	U206	500#	P	S01 T03	
15	U207	500#	P	S01 T03	
16	U208	500#	P	S01 T03	
17	U209	500#	P	S01 T03	
18	U210	500#	P	S01 T03	
19	U211	1000	P	S01 T03	
20	U212	500#	P	S01 T03	
21	U213	500#	P	S01 T03 T04	
22	U214	500#	P	S01 T03	
23	U215	500#	P	S01	
24	U216	500#	P	S01	
25	U217	500#	P	S01 T04	
26	U218	500#	P	S01 T03	

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CONTINUE ON REV.

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

EPA I.D. NUMBER (enter from page 1): W N M 0 8 9 0 0 1 0 5 1 5

FOR OFFICIAL USE ONLY: W DUP 2 DUP

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.)
1	U163	500*	P	S01 T03	
2	U164	500*	P	S01 T03	
3	U165	500*	P	S01 T03	
4	U166	500*	P	S01 T03	
5	U167	500*	P	S01 T03	
6	U168	500*	P	S01 T03	
7	U169	500*	P	S01 T03	
8	U170	500*	P	S01 T03	
9	U171	500*	P	S01 T03	
10	U172	500*	P	S01 T03	
11	U173	500*	P	S01 T03	
12	U174	500*	P	S01 T03	
13	U176	500*	P	S01 T03	
14	U177	500*	P	S01 T03	
15	U178	500*	P	S01 T03	
16	U179	500*	P	S01 T03	
17	U180	500*	P	S01 T03	
18	U181	500*	P	S01 T03	
19	U182	500*	P	S01 T03	
20	U183	500*	P	S01 T03	
21	U184	500*	P	S01 T03	
22	U185	500*	P	S01 T03	
23	U186	500*	P	S01 T03	
24	U187	500*	P	S01 T03	
25	U188	1000	P	S01 T03	
26	U189	500*	P	S01 T04 T03	

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CONTINUE ON REVERSE

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

Form Approved OMB No. 158-S20

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 1	W DUP	2 DUP

14. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter codes)	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.)
1	U137	1,000	P	S01 T03	
2	U138	1,000	P	S01 T03	
3	U139	1,000	P	S01 T03	
4	U140	1,000	P	S01 T03	
5	U141	1,000	P	S01 T03	
6	U142	1,000	P	S01 T03	
7	U143	1,000	P	S01 T03	
8	U144	1,000	P	S01	
9	U145	1,000	P	S01	
10	U146	1,000	P	S01	
11	U147	1,000	P	S01 T03	
12	U148	1,000	P	S01 T03	
13	U149	1,000	P	S01 T03	
14	U150	1,000	P	S01 T03	
15	U151	1,000	P	S01	
16	U152	1,000	P	S01 T03	
17	U153	1,000	P	S01 T03	
18	U154	1,000	P	S01 T03	
19	U155	1,000	P	S01 T03	
20	U156	1,000	P	S01 T03	
21	U157	1000	P	S01 T03	
22	U158	1,000	P	S01 T03	
23	U159	1000	P	S01 T03	
24	U160	1,000	P	S01 T03 T04	
25	U161	1,000	P	S01 T03	
26	U162	1,000	P	S01 T03	

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Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

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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	1	W DUP	2 DUP

V. 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))
1	U 1 1 1	500*	P	S 0 1	T 0 3			
2	U 1 1 2	500*	P	S 0 1	T 0 3	T 0 4		
3	U 1 1 3	500*	P	S 0 1	T 0 3	T 0 4		
4	U 1 1 4	500*	P	S 0 1	T 0 3			
5	U 1 1 5	500*	P	S 0 1	T 0 3	T 0 4		
6	U 1 1 6	500*	P	S 0 1	T 0 3			
7	U 1 1 7	500*	P	S 0 1	T 0 3	T 0 4		
8	U 1 1 8	500*	P	S 0 1	T 0 3	T 0 4		
9	U 1 1 9	500*	P	S 0 1	T 0 3			
10	U 1 2 0	500*	P	S 0 1	T 0 3			
11	U 1 2 1	500*	P	S 0 1				
2	U 1 2 2	1000	P	S 0 1	T 0 3			
13	U 1 2 3	500*	P	S 0 1	T 0 3			
14	U 1 2 4	500*	P	S 0 1	T 0 3			
15	U 1 2 5	500*	P	S 0 1	T 0 3			
16	U 1 2 6	500*	P	S 0 1	T 0 3			
17	U 1 2 7	500*	P	S 0 1	T 0 3			
18	U 1 2 8	500*	P	S 0 1	T 0 3			
19	U 1 2 9	500*	P	S 0 1	T 0 3			
20	U 1 3 0	500*	P	S 0 1	T 0 3			
21	U 1 3 1	500*	P	S 0 1	T 0 3			
22	U 1 3 2	500*	P	S 0 1	T 0 3			
23	U 1 3 3	500*	P	S 0 1	T 0 3	T 0 4		
4	U 1 3 4	10,000	P	S 0 1	T 0 1			
25	U 1 3 5	500*	P	S 0 1	T 0 4	T 0 3	T 0 1	
26	U 1 3 6	500*	P	S 0 1	T 0 3			

CONTINUE ON REV

Continued from page 2.
NOTE Photocopy this page before completing if you have more than 26 wastes to list.

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EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY	
M M 0 8 9 0 0 1 0 5 1 5	W DUP	1 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter codes)	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)
1	U 0 8 3	500*	P	S 0 1	T 0 3		
2	U 0 8 4	500*	P	S 0 1	T 0 3		
3	U 0 8 5	500*	P	S 0 1	T 0 3		
4	U 0 8 6	500*	P	S 0 1	T 0 3		
5	U 0 8 7	500*	P	S 0 1	T 0 3		
6	U 0 8 8	500*	P	S 0 1	T 0 3		
7	U 0 8 9	500*	P	S 0 1	T 0 3		
8	U 0 9 0	500*	P	S 0 1	T 0 3		
9	U 0 9 1	500*	P	S 0 1	T 0 3		
10	U 0 9 2	500*	P	S 0 1	T 0 4	T 0 3	
11	U 0 9 3	500*	P	S 0 1	T 0 3		
12	U 0 9 4	500*	P	S 0 1	T 0 3		
13	U 0 9 5	500*	P	S 0 1	T 0 3		
14	U 0 9 6	500*	P	S 0 1	T 0 3		
15	U 0 9 7	500*	P	S 0 1	T 0 3		
16	U 0 9 8	500*	P	S 0 1	T 0 3		
17	U 0 9 9	500*	P	S 0 1	T 0 3		
18	U 1 0 1	500*	P	S 0 1	T 0 3		
19	U 1 0 2	500*	P	S 0 1	T 0 3		
20	U 1 0 3	500*	P	S 0 1	T 0 3		
21	U 1 0 5	500*	P	S 0 1	T 0 3		
22	U 1 0 6	500*	P	S 0 1	T 0 3		
23	U 1 0 7	500*	P	S 0 1	T 0 3		
24	U 1 0 8	500*	P	S 0 1	T 0 3		
25	U 1 0 9	500*	P	S 0 1	T 0 3		
26	U 1 1 0	500*	P	S 0 1	T 0 3		

CONTINUE ON REVERSE

NOTE: Photocopy this page before completing if you have more than 26 waste codes.

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W N H 0 8 9 0 0 1 0 5 1 5 1	W DUP 2 DUP

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)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D.1.)
1	U056	500*	P	S01 T03	
2	U057	500*	P	S01 T03	
3	U058	500*	P	S01 T03	
4	U059	500*	P	S01 T03	
5	U060	500*	P	S01 T03	
6	U061	500*	P	S01 T03	
7	U062	500*	P	S01 T03	
8	U063	500*	P	S01 T03	
9	U064	500*	P	S01 T03	
10	U066	500*	P	S01 T03	
11	U067	500*	P	S01 T03	
12	U068	500*	P	S01 T03	
13	U069	500*	P	S01 T03	
14	U070	500*	P	S01 T03	
15	U071	500*	P	S01 T03	
16	U072	500*	P	S01 T03	
17	U073	500*	P	S01 T03	
18	U074	500*	P	S01 T03	
19	U075	500*	P	S01	
20	U076	500*	P	S01 T03	
21	U077	500*	P	S01 T03	
22	U078	500*	P	S01 T03	
23	U079	500*	P	S01 T03	
	U080	1000	P	S01 T03	
25	U081	500*	P	S01 T03	
26	U082	500*	P	S01 T03	

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CONTINUE ON REV.

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NOTE Processes (on page before continued) if you have more than 26 wastes to list

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EPA I.D. NUMBER (enter from page 1): W N M 0 8 9 0 0 1 0 5 1 5

FOR OFFICIAL USE ONLY: W DUP DUP

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)
1	U028	1,000	P	S01	T03			
2	U029	1,000	P	S01	T03			
3	U030	1,000	P	S01	T03			
4	U031	1,000	P	S01	T03			
5	U032	1,000	P	S01	T01			
6	U033	1,000	P	S01	T04			
7	U034	1,000	P	S01	T03			
8	U035	1,000	P	S01	T03			
9	U036	1,000	P	S01	T03			
10	U037	1,000	P	S01	T03			
11	U038	1,000	P	S01	T03			
12	U039	1,000	P	S01	T03			
13	U041	1,000	P	S01	T03			
14	U042	1,000	P	S01	T03	T04		
15	U043	1,000	P	S01	T03	T04		
16	U044	1000	P	S01	T03			
17	U045	1,000	P	S01	T03	T04		
18	U046	1,000	P	S01	T03			
19	U047	1,000	P	S01	T03			
20	U048	1,000	P	S01	T03			
21	U049	1,000	P	S01	T03			
22	U050	1,000	P	S01	T03			
23	U051	1,000	P	S01	T03			
24	U052	1,000	P	S01	T03			
25	U053	1,000	P	S01	T03			
26	U055	1,000	P	S01	T03			

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

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	W DUP 1 2 DUP

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)
1	U001	500*	P	S01	T03				
2	U002	1000	P	S01	T03				
3	U003	500*	P	S01	T03				
4	U004	500*	P	S01	T03				
5	U005	500*	P	S01	T03				
6	U006	500*	P	S01	T04	T03			
7	U007	500*	P	S01	T03				
8	U008	500*	P	S01	T03	T04			
9	U009	500*	P	S01	T03				
10	U010	500*	P	S01	T03				
11	U011	500*	P	S01	T03				
12	U012	500*	P	S01	T03				
13	U014	500*	P	S01	T03				
14	U015	500*	P	S01	T03				
15	U016	500*	P	S01	T03				
16	U017	500*	P	S01	T03				
17	U018	500*	P	S01	T03				
18	U019	1000	P	S01	T03				
19	U020	500*	P	S01	T03	T04			
20	U021	500*	P	S01	T03				
21	U022	500*	P	S01	T03				
22	U023	500*	P	S01	T03	T04			
23	U024	500*	P	S01	T03				
24	U025	500*	P	S01	T03				
25	U026	500*	P	S01	T03				
26	U027	500*	P	S01	T03				

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

Form Approved OMB No. 158-S30004

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	W DUP	DUP

V. 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.)
1	U 2 1 9	500*	P	S 0 1	T 0 3			
2	U 2 2 0	1000	P	S 0 1	T 0 3			
3	U 2 2 1	500*	P	S 0 1	T 0 3			
4	U 2 2 2	500*	P	S 0 1	T 0 3			
5	U 2 2 3	1000	P	S 0 1	T 0 3			
6	U 2 2 5	500*	P	S 0 1				
7	U 2 2 6	1500	P	S 0 1	T 0 3			
8	U 2 2 7	500*	P	S 0 1	T 0 3			
9	U 2 2 8	2000	P	S 0 1	T 0 3			
10	U 2 3 0	500*	P	S 0 1	T 0 3			
11	U 2 3 1	500*	P	S 0 1	T 0 3			
12	U 2 3 2	500*	P	S 0 1	T 0 3			
13	U 2 3 3	500*	P	S 0 1	T 0 3			
14	U 2 3 4	500*	P	S 0 1	T 0 4	T 0 3		
15	U 2 3 5	500*	P	S 0 1	T 0 3			
16	U 2 3 6	500*	P	S 0 1	T 0 3			
17	U 2 3 7	500*	P	S 0 1	T 0 3			
18	U 2 3 8	500*	P	S 0 1	T 0 3			
19	U 2 3 9	1000	P	S 0 1	T 0 3			
20	U 2 4 0	500*	P	S 0 1	T 0 3			
21	U 2 4 2	500*	P	S 0 1	T 0 3			
22	U 2 4 3	500*	P	S 0 1	T 0 3			
23	U 2 4 4	500*	P	S 0 1	T 0 3			
24	U 2 4 6	500*	P	S 0 1				
25	U 2 4 7	500*	P	S 0 1	T 0 3			
26	U 2 4 8	500*	P	S 0 1	T 0 3			

EPA Form 3510-3 (6-80)

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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)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	U249	500*	P	S01	
2	U326	500*	P	S01T03	
3	U353	500*	P	S01T03	
4	U359	500*	P	S01T03	
5					
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STATE OF NEW MEXICO
ENVIRONMENT DEPARTMENT

DOCKETED
BY THE HEARING CLERK

SEP 23 1994

IN THE MATTER OF
U.S. DEPARTMENT OF ENERGY
AND THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA, LOS ALAMOS NATIONAL
LABORATORY, LOS ALAMOS, NEW MEXICO,
RESPONDENTS

COMPLIANCE ORDER
NO. NMHSWA 94-12

BEFORE THE SECRETARY OF ENVIRONMENT

MOTION REQUESTING EXTENSION
OF TIME

COME NOW Respondents, the Department of Energy (DOE) and the Regents of the University of California (UC), and hereby move that the Hearing Officer grant to Respondents an extension of time until October 14, 1994, within which to comply with ordered action No. 2 of the above-captioned Compliance Order. As grounds for this Motion, Respondents state that representatives of Respondents will be meeting on October 4, 1994, with representatives of Complainant to discuss, among other issues, Respondent's development of a corrective action plan, responsive to ordered action No. 2, to address alleged deficiencies in Respondents' use of knowledge of process, and that submitting the corrective action plan on September 27, 1994, the date ordered in the Compliance Order, would be premature, given that the discussions that will occur on October 4, 1994, may affect the substance of the corrective action plan that is finally submitted. Respondents state that allowing the corrective action plan to be submitted on October 14, 1994, will enable Respondents to submit a document that is more fully responsive to ordered action No. 2, as it will enable Respondents to take into account

in the final document the discussions that will occur on October 4, 1994.

WHEREFORE, Respondents pray that the Hearing Officer grant Respondents until October 14, 1994, within which to respond to order action No. 2 of the Compliance Order.

Counsel for Complainant concurs in this request for extension.

Respectfully submitted,

UNITED STATES DEPARTMENT OF ENERGY

By: _____

Lisa Cummings, Esq.
Los Alamos Area Office
Los Alamos, New Mexico 87544
(505) 667-4667

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

By: _____

Joseph B. Rochelle, Esq.
Post Office Box 1663
Mail Stop A187
Los Alamos, New Mexico 87544
(505) 667-3766

Certificate of Service

I hereby certify that a copy of the foregoing Motion and proposed Order was hand-delivered on the twenty-third day of September, 1994, to the following individual:

Susan McMichael, Esq.
Assistant General Counsel
New Mexico Environment Department
Post Office Box 26110
Santa Fe, New Mexico 87502-6110

Joya Hester Lauser

~~Lisa Cummings~~, Esq.
Joya Hester Lauser

STATE OF NEW MEXICO
ENVIRONMENT DEPARTMENT

IN THE MATTER OF
U.S. DEPARTMENT OF ENERGY
AND THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA, LOS ALAMOS NATIONAL
LABORATORY, LOS ALAMOS, NEW MEXICO,
RESPONDENTS

COMPLIANCE ORDER
NMHSWA 94-12

ORDER

THIS MATTER having come before the Hearing Officer by Motion of Respondents, the Department of Energy (DOE) and the Regents of the University of California (UC), and having been concurred in by Complainant the Water and Waste Management Division of the New Mexico Environment Department, and the Hearing Officer having been fully advised in the premises finds that the motion is well taken and should be granted.

THEREFORE, it is ordered, adjudged, and decreed that Respondents are granted an extension until October 14, 1994, within which to submit to Complainant a corrective action plan responsive to ordered action No. 2 of the above-captioned Compliance Order.

_____
Hearing Officer

Approved: _____
Joseph B. Rochelle, Esq.
Counsel for Respondent
UC

for _____
Lisa Cummings, Esq.
Counsel for Respondent
DOE

_____
Susan McMichael, Esq.
Counsel for Complainant
TELEPHONICALLY APPROVED 9/23/94

STATE OF NEW MEXICO
ENVIRONMENT DEPARTMENT

DOCKETED
BY THE HEARING CLERK

SEP 1 4 1994

IN THE MATTER OF
U.S. DEPARTMENT OF ENERGY
AND THE REGENTS OF THE UNIVERSITY
OF CALIFORNIA, LOS ALAMOS NATIONAL
LABORATORY, LOS ALAMOS, NEW MEXICO,
RESPONDENTS

COMPLIANCE ORDER
NO. NMHSWA 94-12
BEFORE THE SECRETARY OF ENVIRONMENT

ANSWER TO ADMINISTRATIVE ORDER REQUIRING
COMPLIANCE AND PROPOSING TO ASSESS A CIVIL PENALTY

Respondents the Department of Energy (DOE) and the Regents of the University of California (UC) hereby submit this joint answer to Compliance Order 94-12 (Order).

FINDINGS

1. Respondents admit the findings contained in Paragraph 1.

2. Respondents admit the findings contained in Paragraph 2.

3. Respondents admit the findings contained in Paragraph 3.

4. Respondents admit the findings contained in Paragraph 4.

5. As to the findings contained in Paragraph 5, Respondents admit and state as follows: In late April and May, 1994, the subcontractors of Respondents placed soils from the excavation of SWMU 3-010(a), located near Building 30 at Technical Area (TA) 3, into Pit 37 in Area G of TA 54. Pit 37 is a low level radioactive solid waste landfill. The soil was removed as part of the remediation of this SWMU.

As part of their initial sampling effort and in response to a request by Surface Water Quality Bureau personnel, Respondents had samples taken in August, 1992, of suspected

contaminated soils and these samples were analyzed by a laboratory which found trace levels of volatile organics, i.e., 1,1,1,-trichloroethane (TCA) and acetone. As the level of these contaminants was far below screening action levels (SALS) for remediation, their presence did not affect regulatory compliance-based decisions. Personnel of both the Surface Water Quality Bureau and the Hazardous and Radioactive Materials Bureau of the New Mexico Environment Department (NMED) were aware of the presence of traces of these volatile organics and approved a version of a sampling and remediation plan as early as January, 1993, that did not address sampling of or further action upon volatile organics, due to the minute levels at which these volatile organics were present.

The soils were taken out of the SWMU in a number of lifts and the soils at issue were taken out after all mercury-containing soils had been removed. At the time of the disposal of the soil at issue in Pit 37, additional samples were taken of this soil and analyzed and traces of TCA and trichloroethylene (TCE) were observed in the soil. The source of the trace levels of these contaminants in the soil was unknown. Subsequent interviews with former employees of the nearby pump shop indicated that solvents may have been used to clean the pumps. Accordingly, Respondents suspected that the soil might have been contaminated with solvent-containing wastes.

To the extent that the findings in the first sentences of Paragraph 5 of the Order are inconsistent with or contrary to the above statements of Paragraph 5 of the Answer, they are denied by Respondents. Respondents admit the findings contained in the second sentence of Paragraph 5 of the Order, except that Respondents deny that the soil had been characterized as being "contaminated" with mercury and affirmatively state that the soil had been

characterized as "containing" mercury. Respondents deny the finding in the third and fourth sentences of Paragraph 5 of the Order.

Respondents admit the findings contained in the fifth sentence of Paragraph 5 of the Order, except that Respondents deny that the first lift of the soils was found to contain "gross mercury contamination," and affirmatively state that the first lift of soils was found to "contain" mercury.

Respondents deny the findings contained in the sixth sentence of Paragraph 5 of the Order, except that Respondents admit that the soils containing mercury were containerized and handled as low-level radioactive waste.

6. Respondents admit the findings contained in Paragraph 6, except that Respondents deny that the soils were mercury "contaminated," but admit that the soils "contained" mercury.

7. Respondents admit the findings contained in Paragraph 7.

8. Respondents admit the findings contained in Paragraph 8, except that Respondents deny that samples were taken " to determine the level total petroleum hydrocarbons (TPH)." Respondents affirmatively state that samples were taken to determine the mercury and BTEX constituents, if any, in the mineral oil suspected of being present at the soil/tuff contact. Respondents admit the findings contained in the second sentence of Paragraph 8, subject to the insertion of the phrase "of these samples" between the number "1994" and the word "indicated." Thus, the sentence would read: "Analyses received by Respondents on May 13, 1994, of these samples indicated the presence of volatile organic constituents."

With regard to the findings contained in the third sentence in Paragraph 8, Respondents admit that the further analysis of samples of the soil that was placed in Pit 37 confirmed the presence of trace amounts of volatile organics, i.e., 1,1,1-trichloroethane (TCA) and trichloroethylene (TCE), which when discarded, may constitute listed hazardous wastes, but deny that the presence of the trace amounts of these two constituents in the soil necessarily rendered the soil a hazardous waste. With regard to the findings contained in the fourth sentence of Paragraph 8, Respondents admit that based on the analytical results of the soil at issue, Respondents contacted Complainant by phone on May 20, 1994, and informed Complainant that soils containing trace amounts of TCA and TCE had been placed into Pit 37, that further investigation and inquiry would occur as to whether or not the soils constituted hazardous wastes, and that Respondent DOE provided by way of letter dated June 1, 1994, to Benito Garcia, Chief of the Hazardous and Radioactive Materials Bureau, a copy of which is attached hereto as Attachment 1, official notification of the placement of the soil in Pit 37 and of Respondents' determination that the soil placed in Pit 37 was not a RCRA hazardous waste. Respondents deny the findings contained in the fourth sentence of Paragraph 8 to the extent such findings are inconsistent with or contrary to the admissions contained in this sentence.

9. With regard to the findings contained in the first sentence of Paragraph 9, Respondents deny that the soils were hazardous/mixed waste contaminated, but admit the remaining findings contained therein. With regard to the findings contained in the second sentence in Paragraph 9, Respondents admit that they have not applied for a permit to treat, store, or dispose of hazardous\mixed waste at Pit 37. Respondents deny any other findings contained

in Paragraph 9 to the extent such findings are inconsistent with or contrary to the admission contained in Paragraph 9 of this Answer.

10. With regard to the findings contained in Paragraph 10, Respondents deny that they have failed to notify the Environment Protection Agency (EPA) that LANL is a transporter of hazardous waste. Respondents affirmatively state that the EPA was notified by Respondents that LANL was a transporter of hazardous wastes by way of submittal of EPA Notification Form 8700-12, dated August 13, 1980. Respondents assert that Complainant or its predecessor in interest was notified in 1980 of the fact that LANL was a transporter and therefore denies this finding. A copy of the August 13, 1980, notification is attached hereto as Attachment 2.

CONCLUSIONS

1. Respondents admit the conclusions contained in Paragraph 1.

2. Respondents admit the conclusions contained in Paragraph 2, but deny that they fulfill the terms of the referenced definition of generator with respect to the soil that was placed in Pit 37.

3. Respondents admit the conclusions contained in Paragraph 3, but deny that they generated "mixed waste" as described by the words in Paragraph 3 with respect to the soil that was placed in Pit 37.

4. Respondents admit all of the conclusions contained in Paragraph 4, except that Respondents deny that the soil that was placed into Pit 37 was "hazardous waste" as described by the terms of the referenced definition.

5. Respondents admit the conclusions contained in Paragraph 5.

6. Respondents admit all of the conclusions contained in Paragraph 6, except that Respondents deny that they engage in the disposal of hazardous waste onsite.

7. Respondents admit the conclusions contained in Paragraph 7.

8. Respondents admit all of the conclusions contained in Paragraph 8, except that Respondents deny that they fulfill the terms of the referenced definition of transporter with respect to the soil that was placed in Pit 37.

9. Respondents admit all of the conclusions contained in the first sentence of Paragraph 9, except that Respondents deny that the referenced regulations apply to Respondents with respect to the soil that was placed in Pit 37 and deny that they have violated regulations in Part 262 as specified thereafter in the Order. Respondents admit all of the conclusions contained in the second sentence of Paragraph 9, except that Respondents deny that the referenced regulations apply to Respondents with respect to the soil that was placed in Pit 37 and deny that they have violated regulations in Part 270 as specified in the remainder of the Order.

10. Respondents deny all the conclusions contained in the first and second sentences of Paragraph 10, except that Respondents admit that Section 301 of HWMR-7 incorporates by reference federal regulation 40 C.F.R. 262.20(a).

11. Respondents deny all the conclusions contained in the first and second sentences of Paragraph 11, except that Respondents admit that Section 901 of HWMR-7 incorporates by reference federal regulation 40 C.F.R. 270.10.

12. Respondents deny all of the conclusions contained in the first and second sentences of Paragraph 12, except that Respondents admit that Section 301 of HWMR-7 incorporates by reference federal regulation 40 C.F.R. 262.12 (a).

13. Respondents deny the conclusions contained in the first paragraph numbered 13.

14. Respondents deny the conclusions contained in the second paragraph numbered 13, except that if conclusion 12 is determined to be a violation, which Respondents specifically deny, then Respondents admit that such violation, if any, is not a high priority violation.

FIRST AFFIRMATIVE DEFENSE

Respondents' Answer and each denial contained therein constitutes Respondents' first affirmative defense.

SECOND AFFIRMATIVE DEFENSE

Complainant's findings, conclusions, proposed penalties, ordered actions and any and all other relief sought in Complainant's Order are barred by the doctrine of estoppel inasmuch as personnel employed by Complainant approved Respondents' Sampling and Remediation Plan which proposed management of the soil at issue as a nonhazardous waste and Respondents relied on such approval.

THIRD AFFIRMATIVE DEFENSE

Complainant's findings, conclusions, proposed penalties, ordered actions and any and all other relief sought in Complainant's Order are barred by the doctrine of estoppel inasmuch as personnel employed by Complainant approved Respondent's management of the soil at issue as a nonhazardous waste.

FOURTH AFFIRMATIVE DEFENSE

Complainant's findings, conclusions, proposed penalties, ordered actions and any and all other relief sought in Complainant's Order are barred by the doctrine of ratification inasmuch as personnel employed by Complainant approved Respondents' Sampling and Remediation Plan. Complainant's approval of the Sampling and Remediation Plan serves to confirm as proper Respondents' management of the soil at issue as nonhazardous waste containing only trace quantities of volatile organics in the soils.

FIFTH AFFIRMATIVE DEFENSE

Based on the discussion contained on pages two and three of Respondent DOE's official letter of notification to Benito Garcia, Chief, Hazardous and Radioactive Materials Bureau, dated June 1, 1994 (Attachment 1), which explains the basis for Respondents' determination that the soil disposed of in Pit 37 was not a hazardous waste, Respondents maintain that this soil was not a hazardous or mixed waste.

SIXTH AFFIRMATIVE DEFENSE

Based on Respondents' determination and belief that the soil transported to Pit 37 was not a hazardous or mixed waste, Respondents state that the manifest requirement contained in 40 C.F.R. 262.20(a), adopted by reference by Section 301 of HWMR-7, was not applicable to the transportation of the soil.

SEVENTH AFFIRMATIVE DEFENSE

If it is finally determined by the adjudicatory process that the soil transported to Pit 37 was a hazardous or mixed waste, which Respondents specifically deny, then Respondents

state that the manifest requirement contained in 40 C.F.R. 262.20(a), adopted by reference by Section 301 of HWMR-7, did not require use of the EPA uniform manifest form for transport of the soil from TA-3 to TA-54, because the soil was transported onsite within the meaning of regulation 40 C.F.R. 260.10, adopted by reference by Section 101 of HWMR-7, and was not transported for "offsite treatment, storage, or disposal" as required by the terms of 40 C.F.R. 262.20(a).

EIGHTH AFFIRMATIVE DEFENSE

If it is finally determined by the adjudicatory process that the soil transported from TA-3 to Pit 37 in TA-54 was a hazardous or a mixed waste, which Respondents specifically deny, then Respondents state that as indicated in LANL's Hazardous Waste Facility Permit, Permit Number 0890010515-1, issued November 8, 1989 (Permit), the term "onsite" is defined to include TA's 3 and 54 and thus the transport of the soil occurred and remained onsite. Respondents state that if it is finally determined by the adjudicatory process that the soil transported from TA-3 to Pit 37 in TA-54 was a hazardous or mixed waste, which respondents specifically deny, the soil should have been transported with the use of LANL's Chemical Waste Disposal Request Form (CWDR), which functions as an internal manifest form, as referenced in Attachment A (Waste Analysis Plan and Waste Segregation Procedures) and Attachment F (Container Management) of LANL's Hazardous Waste Facility Permit. Respondents admit that the CWDR was not used in transporting the soil, as it was not known at the time of transport that the soil might be construed to be a hazardous or mixed waste.

NINTH AFFIRMATIVE DEFENSE

If it is determined in the adjudicatory process that the soil disposed of in Pit 37 was neither a hazardous or a mixed waste, which is the position of Respondents, then any disposal of the soil in Pit 37 was legally permissible and no violation of Section 901 of HWMR-7, which incorporates by reference 40 C.F.R. 270, occurred, as no hazardous or mixed waste would have been placed in an unpermitted landfill.

TENTH AFFIRMATIVE DEFENSE

As admitted by Complainant in the Order, Respondent DOE self-reported the disposal of the soil in Pit 37, and followed up with an official written notification of the incident. In this notification Respondent DOE (1) admitted that there was room for regulatory interpretation concerning the character of the soil, (2) offered a well reasoned interpretation for why the soil should not be construed to be a hazardous waste, and (3) indicated, in the event that it was determined that the soil was a hazardous waste, that Respondents were prepared to remove the soil from the pit. Complainant's response to these actions was to issue the Order against Respondents. Respondents expression and exercise of good faith should lead to the reduction if not elimination of any civil penalty determined to be appropriate by the Hearing Officer or the Secretary.

ELEVENTH AFFIRMATIVE DEFENSE

With regard to the civil penalty proposed by Complainant, Respondents assert the following defenses:

a. Complainant failed to consider the good faith efforts of Respondents to comply with alleged applicable requirements, pursuant to 74-4-10.B. NMSA 1978;

b. Complainant failed to consider the seriousness of the violation, pursuant to 74-4-10.B. NMSA 1978;

c. Complainant failed to adhere to the Hazardous Waste Penalty Policy adopted by Complainant on September 4, 1992;

d. Complainant improperly imposed penalties for violations of law which did not occur; and

e. Complainant's imposition of penalties is arbitrary, capricious and without substantial basis in law or in fact.

f. Complainant's imposition of penalties is barred by the doctrine of estoppel.

FACTS PLACED AT ISSUE

Pursuant to the stated requirement on page 6 of the Order, Respondents state that they place at issue all facts denied in this Answer.

REQUEST FOR HEARING

Pursuant to Section 74-4-10.H. NMSA Respondent hereby requests a hearing.

WHEREFORE, Respondents request that the determination be made that Respondents did not violate Section 301 of HWMR-7, which incorporates by reference 40 C.F.R. 262.20 and 40 C.F.R. 262.12(a), and did not violate Section 901 of HWMR-7, which incorporates by reference 40 C.F.R. 270.10, that the civil penalty proposed by Complainant be denied,

that the schedule of compliance and the actions thereunder ordered by Complainant be denied, and that other such relief as the Hearing Officer deems just and proper be granted.

UNITED STATES DEPARTMENT OF ENERGY

By _____
Lisa Cummings, Esq.
Los Alamos Area Office
Los Alamos, New Mexico 87544
(505) 667-4667

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

By: _____
for Joseph B. Rochelle, Esq.
Post Office Box 1663
Mail Stop A187
Los Alamos, New Mexico 87544
(505) 667-3766

Certificate of Service

I hereby certify that a copy of the foregoing Answer was hand-delivered on the fourteenth day of September, 1994 to the following individuals:

Kathleen M. Sisneros, Director
Waster and Waste Management Division
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Santa Fe, New Mexico 87502-6110

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