

**Los Alamos**  
NATIONAL LABORATORY  
**memorandum**

Weapons Materials Applications

To/MS: Dennis Erickson, ESH-DO, MS K491  
Thru: Larry Stretz, ESA-WMA, MS C930  
From/MS: Doug Hemphill, ESA-WMA, MS C930  
Phone/FAX: 7-8335/5-5548  
Symbol: ESA-WMA-94-015  
Date: October 7, 1994

**SUBJECT: RESPONSE TO APPARENT FINDINGS FROM THE ANNUAL  
RCRA INSPECTION OUT-BRIEFING**

After reviewing apparent findings from the RCRA inspection made by NMED personnel it became obvious that clarification of several issues is required. I will address each apparent finding and state ESA-WMA's response and, if required, our plan of action to rectify the situation.

**Apparent Finding** TA-16-386 - ESA-2 - This <90 day storage location did not have: any spill control equipment, an eyewash station located nearby, any communications at the site, nor any fire extinguishers.

**Response** Attachment 1. is a map of the TA-16 Burning Ground facility with locations of fire extinguishers, telephones, radios, eyewash stations and spill control equipment. Because of the nature of operations, the entire facility has been formally designated as a <90 day storage area. The majority of hazardous and non-hazardous waste is located within a fenced area shown on Attachment 1. Spill control equipment is located permanently at a central location within the facility. Additional spill control equipment is available in the vacuum truck typically parked within 10 feet of the storage area at the 386 pad, and in the tool shed located adjacent to the storage area. An eyewash station is located in the burn ground control building (16-389), approximately 48 feet from the storage area gate. Communications equipment available include a telephone and radio inside the control building, one radio located in the HE transportation truck parked usually inside or within 25 feet of the storage area, and a personnel pager worn by the lead supervisor. Several fire extinguishers are available to operating personnel at the storage area including one in the control building, and five more located in the three trucks parked in or within 25 feet of the front of the storage area and three more located throughout the facility. All the above listed emergency equipment have been in place since the entire burn ground was designated as a < 90 day storage area.

It should be noted that the storage area is located in a fenced area that is normally kept locked when unattended to prevent unauthorized entry. When operating personnel are in the storage area, the fence remains unlocked to allow access to the emergency equipment located within the burn ground facility.



16616

Attachments 2. and 3. show guidelines given by LANL and in the CFR regarding safe operations of a < 90 day storage area. ESA-WMA has always made every effort to comply with all known rules and regulations pertaining to safe and environmentally conscious operation of the < 90 day storage area. If there are additional NMED or UC requirements over and above those referenced, we would certainly like to know about them so that we can abide by them also.

**Apparent Finding** There were no signs at the entrances to the OB/OD areas.

**Response** Attachment 4 is a collage of pictures showing signs posted along the entrance to the disposal facility and entrances to open burn pads. These sign locations are also marked on the map of the facility shown in Attachment 1. These signs have been posted for several years and other similar ones prior to those. It is difficult to envision how we could better post these areas but, once again, if there are additional state regulations regarding posting of these facilities we certainly want to know about them.

**Apparent Finding** TA-16-0-ESA-2-0 - There was no analytical data for metals for the flash pads.

**Response** Flash pad operations are generally for commercially available materials and equipment flashed as a precaution because they have been used in conjunction with HE and may be contaminated with HE. They are considered to be non-hazardous, administratively controlled, materials only as profiled by WPF 07259 incoming to the flash pad and WPF 08180 outgoing from the flash pad (see Attachments 5 and 6). As such, these materials are not subject to metals analysis. HE and HE contaminated wastes are not subject to metals analysis as stated in Attachment A of the Facility Operating Permit (see Attachment 7) and are characterized through process knowledge. Through process knowledge, sand sent to TA-54 from the HE filter vessels are considered contaminated with barium until proven otherwise and as such, are subject to metals analysis. Attachment 8 shows a copy of that analysis. As stated in the RCRA Part B application, burn pad sand (actually structure 401 and 406 filter vessel sand, there is no sand used or generated at any of the burn pads 387, 388, and 399) is tested for barium content prior to release then treated as hazardous or non-hazardous depending on barium test results. Both cases are profiled, WPF 09425 refers to non-hazardous waste containing less than 100 ppm barium, WPF 09424 refers to hazardous waste containing greater than 100 ppm barium (see Attachments 9 and 10).

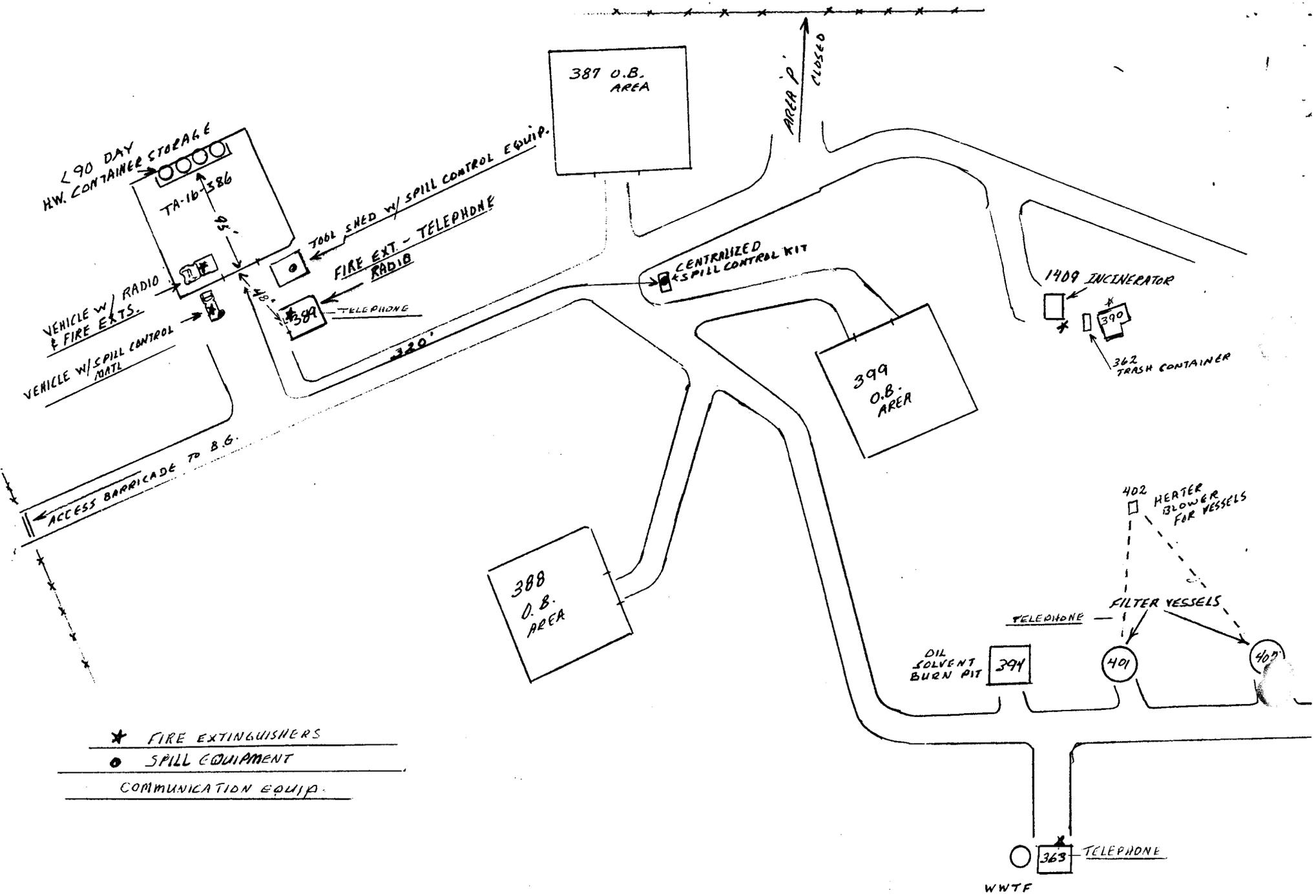
**Apparent Finding** No RCRA refresher training for Pete Velarde was recorded in the training records.

**Response** As shown in the training record for Pete Velarde (Attachment 11), his latest recorded RCRA TSDF Workers and Supervisors training took place in February 1993. In addition, he took the RCRA Personnel Training course in September 1994. Refresher training for RCRA should be scheduled annually. To more effectively document and alert personnel that refresher training is required, ESA-WMA is instituting a flagging program that will work in conjunction with our training database. This will be done through the labwide training system and should be in effect by February 1995.

I hope this response serves to clarify these apparent findings. In some cases, i.e., training flags, we will implement additional controls to allow us to comply with all regulations. In others, we would certainly appreciate having any further documented requirements relayed to us by the State (or Laboratory) in order that we may comply with them. In light of the fact that we have "survived" several inspections of <90 day storage areas by DOE, Laboratory and other organizations with relatively minor findings, I am surprised that more specific information regarding rationale for these new findings, especially potentially major ones, was not offered by the state nor apparently solicited by the Laboratory.

DH/pd

Cy: Dick Burick, ESA-DO, MS P915 w/o att.  
Martin MacRoberts, ESA-DO, MS P915 w/att  
Jack Ellvinger, ESH-19, MS K498 w/ att  
Larry Hatler, ESA-WMA, MS C930w/o att  
Tony Grieggs, ESH-19, MS K498 w/ att  
Cindy Sandoval, ESA-WMA, MS C930 w/o att  
Bart Olinger, ESA-WMA, MS C930 w/o att  
Royce Taylor, ESA-WMA, MS C930 w/o att



Attachment 1

—NOT TO SCALE—