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

MAR 29 1993

Barbara
Pls get a session
going w/ Bruce &
me on this
Benito

TVX

File LANL
HSWA
General

LANL HSWA GEN/PERMIT

Benito Garcia, Bureau Chief
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, NM 87502

Dear Mr. Garcia:

Enclosed please find a list of 38 Solid Waste Management Units (SWMUs) (Enclosure I) that are identified in the Module VIII Permit and which the Department of Energy and our contractor, the University of California, believe do not need to be addressed under the permit as requiring Hazardous and Solid Waste Amendments (HSWA) corrective actions. We are providing this information at the request of your staff and the Environmental Protection Agency, so that we may discuss which units may need to be removed from the permit in a future modification. These 38 SWMUs are addressed under other Resource Conservation and Recovery Act (RCRA) activities at the facility to ensure that any impact or release from the SWMU will not threaten human health or the environment. Briefly, each of these 37 SWMUs are either operated under RCRA generator requirements (e.g., 40 CFR 262, satellite accumulation areas), RCRA interim status (e.g., 40 CFR 265.382 and 265.383, OB/OD units such as flash pads), or are being closed under RCRA closure plans (e.g., 40 CFR 265.110 through 265.115, Technical Area 53 surface impoundments). Included within the 38 SWMUs, one is requested to be deleted as it is presented in the Module VIII list twice. Following Enclosure I, please find the SWMU number and a brief description in paragraph form for each unit (Enclosure II).

The Support Documentation, 1992 Module VIII Permit Modification Report, that was sent to your office on November 20, 1992, identified 55 SWMUs as being subject to RCRA 3004(a) authorities. As a result of the Los Alamos National Laboratory's further investigation of those units, it has been determined that a subset of these 55 SWMUs should not be included in this submittal. The reason for removing those 17 SWMUs from this exercise was that either the unit never managed solid waste (e.g., the area was, in fact, a product storage area) or that the area at which the active container storage area was located was suspected as having a historical release associated with it. Those units which never managed solid waste will be addressed in a future permit modification request. Those units which have the potential for historical releases in the same proximity as an active container storage area, require further investigation by the Environmental Restoration Program.

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Should you have any questions, please contact Steve Slaten of my staff at FTS 8-505-665-5050.

Sincerely,

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

LESH:7SS-023

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MS-M992
EM-13 File (Symbol
EM-13:93-259), LANL, MS-M992
CRM-4, MS-A150
K. Bitner, ERPO, AL

ENCLOSURE I

List of 38 Solid Waste Management Units

1). 3-001(a)
2). 3-001(b)
3). 3-001(c)
4). 3-001(m)
5). 3-001(p)
6). 3-001(r)
7). 3-002(b)
8). 3-035(a)
9) . 3-035(b)
10). 3-035(d)
11). 14-004(b)
12). 14-005
13). 15-003
14). 16-010(b)
15). 16-010(c)
16). 16-010(d)
17). 16-010(e)
18). 16-010(f)
19). 16-010(j)
20) 16-012(d)
21). 16-012(i)
22). 16-012(j)
23). 16-012(l)
24). 16-012(m)
25). 16-012(n)
26). 16-012(p)
27). 16-012(t)
28). 16-012(u)
29). 16-012(x)
30). 16-013(b)
31). 16-018
32). 21-003
33). 40-003(a)
34). 53-001(a)
35). 53-001(b)
36). 53-002(a)
37). 53-002(b)

Duplicate

38).16-009(b)

ENCLOSURE II

DESCRIPTION OF SWMUs IDENTIFIED IN TABLE A OF THE 1991 MODULE VIII SECTION OF THE LOS ALAMOS RCRA PERMIT

3-001(a): The solid waste management unit (SWMU) is located at TA-3-39. The unit is a less than 90-day storage area at the loading dock located outside, along the east side of Building 39. The unit manages the following wastes in containers: waste coolants; solvents; oils; acids; scrap metals; catalysts; and drums of beryllium wastes submerged in mineral oil. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with the Los Alamos National Laboratory's (LANL) Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

3-001(b): This SWMU is comprised of 14 subunits: 13 satellite accumulation areas and one less than 90-day storage area. The 14 subunits are all located within Technical Area (TA) 3, Building 40 with the exception of the less than 90-day subunit, which is a loading dock located outside and immediately adjacent to the building. Wastes managed include solvents and photoprocessing wastes. Identified below are the 14 subunits and their locations within Building 40.

TA-3-40: Less than 90-day container storage area, outside, northwest loading dock.

TA-3-40: Satellite accumulation area, Room N121, removed August 1992.

TA-3-40: Satellite accumulation area, Room S106, removed August 1992.

TA-3-40: Satellite accumulation area, Room S12, removed August 1992.

TA-3-40: Satellite accumulation area, Room S123.

TA-3-40: Satellite accumulation area, Room S130.

TA-3-40: Satellite accumulation Room S31, removed in approximately 1989.

TA-3-40: Satellite accumulation area, Room W112.

TA-3-40: Satellite accumulation area, Room W116, removed prior to 1990.

TA-3-40: Satellite accumulation area, Room W 122, removed November 1992.

TA-3-40: Satellite accumulation area, Room W123, removed prior to 1990.

TA-3-40: Satellite accumulation area, Room W130.

TA-3-40: Satellite accumulation area, photo lab/dark room.

TA-3-40: Satellite accumulation area, Room S2, removed prior to 1990.

The above unit [300K(b)] (which includes all 14 separate locations) has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at any subunit, it would be managed in accordance with 40 Code of Federal Regulations (CFR) 262.34(d) and LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

3-001(c): This SWMU is a less than 90-day storage area located in TA-3, Building 102, Room 118A. It consists of a shed with the capacity to store up to eight 55-gallon drums. Wastes managed included mixed wastes until November 1992. Wastes managed were radioactive machine chips and diesel oil. This temporary storage area is now used for only hazardous and nonhazardous wastes. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

3-001(m): This SWMU is a less than 90-day storage area located in TA-3, Building 16. The unit has managed radioactive wastes and waste solvents. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

3-001(p): This SWMU is a container storage area located north of TA-3-271. The unit was constructed in 1986/7 and manages used oil. The unit has a concrete floor which is bermed on all sides and slopes toward a sump. The unit is open-sided and has a roof. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. (Note: This SWMU is identified as 3-056(a) in the LANL 1990 SWMU Report.)

3-001(r): This SWMU is a satellite accumulation area located in Building 409, Room 101, at the clinical laboratory. The unit has no release history. The unit has a low release potential to all Environmental media. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

3-002(b): The SWMU is a former less than 90-day storage area. The unit was used to store steel drums containing waste solvents. The unit is also known as the sand blast shed. The unit was active from an undetermined date in the past to 1987. There was an indication that the drums in the unit were noted to be leaking. However, the unit has no confirmed release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would have

been managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

3-035(a): This SWMU is an underground storage tank (UST) which was used to store gasoline at a tank farm located at the gasoline station. The facility identification number for the tank is TA-3-36-1. The tank had an approximate capacity of 10,000 gallons. The tank was removed in 1989. The tank has been removed and the soil in the vicinity monitored in accordance with Resource Conservation and Recovery Act (RCRA) Subtitle I regulations. There is no potential for environmental media to be impacted as the unit has been removed and contaminated soil removed.

3-035(b): This SWMU is an UST located in TA-3, near Building 36. The tank stored diesel fuel and had a 2,961 gallon capacity. The facility identification number for the tank is TA-3-36-3. The tank was installed in 1972. In 1986 a leak was reportedly found in the tank. The tank failed a subsequent tightness test. The tank was removed in February 1991. Approximately 20 cubic yards of contaminated soil was also removed. In a letter dated March 6, 1991, New Mexico Environmental Department (NMED) notified the Department of Energy that the UST site did not impose an immediate public or environmental threat. This unit has been removed and remediated per RCRA Subtitle I regulations.

3-035(d): This SWMU is an UST located in TA-3, near Building 1255. The facility identification number for this tank is TA-3-1255. The tank is used to store diesel fuel for the central alarm system. The tank was installed in 1979 and had a 4,030 gallon capacity. A volumetric test performed in 1986 detected a potential leak in the tank. Subsequent tightness testing of the tank present inconclusive results. This tank is managed under the RCRA Subtitle I Program onsite. Any release from the unit would be addressed per RCRA Subtitle I regulations.

14-004(b): The unit is a satellite accumulation area located in TA 14-23. The unit manages scarp or waste high explosive. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

14-005: This SWMU is identified as a drum-type incinerator in LANL's 1988 SWMU Report. It is, however, a burn cage which operates under interim status. The cage is a small metal cylinder approximately two-feet tall and two-feet in diameter covered by a wire mesh screen. The unit is used for the treatment of small quantities of high explosive wastes and materials, such as paper, tape, cotton swabs, contaminated or suspected of being contaminated with high explosive. The burn cage is located on a steel tray. The burn cage and tray are covered when not in use. The unit is identified in the facility's Part B permit application submitted in November 1988 per 40 CFR 265 Subpart P requirements. The unit has no release history. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. This unit will be closed under an approved RCRA closure plan.

15-003: This is a detonation pad used for the treatment of waste high explosives. The unit is a steel pad approximately 12-feet by 24-feet and 6 inches deep. Two bunkers are located near the pad which are used to store the waste high explosive (HE) prior to detonation. The unit is included in the facility's November 1988 Part A and B permit applications. The unit operates under 40 CFR 265 interim status requirements. The only hazardous constituent known or suspected to be managed at the unit is barium. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved closure plan.

16-010(b): This SWMU is located at 16-387 and is an active flash pad. The pad was constructed in 1951. The pad is used to flash-burn high explosive contaminated material. The burn area is enclosed by a 100-foot by 100-foot fence and is composed of a layer of sand several inches thick over a soil surface. Wastes managed at the unit are high explosives. This unit operates under RCRA interim status. The unit is identified and described in the 1988 Part A and B permit applications. The unit meets all operating requirements of the 40 CFR 265 Subpart P regulations. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed in accordance to an approved closure plan.

16-010(c): The unit is a former burn slab converted to a burn table and is located at TA-16-388. The unit is used to treat high explosive scrap. The unit is located within a 100-foot by 100-foot enclosed area, which contains a concrete pad and a burn table. The concrete pad is used for the unloading of waste explosive. The unit is 12-feet by 20-feet. The burn table is 4-feet by 16-feet and 2-feet above the ground. The tables, or trays, are filled with waste HE to be treated (burned). The table has a metal-covered rain guard that can be rolled back to expose the tray. The unit operates under RCRA interim status. The unit is identified in the 1988 Part A and B permit applications. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved closure plan.

16-010(d): The unit is a burning slab located at TA-16-399. The physical layout of the unit is the same as SWMU 16-010(c). The burning table present to treat (burn) waste high explosive is 4-feet by 16-feet and 2-feet above the ground. The table, or tray, is filled with high explosive contaminated waste to be treated. The burning slab was constructed in 1951. The unit is operated under interim status. This unit is identified in the 1988 Part A and B permit applications. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed in accordance with an approved closure plan.

16-010(e): The unit is a pressure filter tank located at TA-16-401. The tank is cone-shaped, 8-feet in diameter, 10-feet high, and constructed of steel. The tank is equipped with a jib-crane operated cone-shaped steel cover. Approximately three feet of the tank is above grade. The tank was built in 1961 to filter high explosive laden wash water from the basket wash facility. From 1961 to 1966 washwater from the

basket facility were transported to the tank via a trough. In 1966 the basket facility was decommissioned. The tank is now used to treat high explosive process sludge. The sludge is brought to the tanks via tanker trucks from sumps which collect the waste high explosive sludges located throughout the TA. The sludge is discharged into the tanks where it is dried by blowing hot air across the filter residue. The residue is burned in the tank and any residual is raked out and put into drums for later reburning. Within the tank is sand over fine and coarse layers of gravel. Approximately 750 pounds of sludge can be burned at one time. The unit is operated under RCRA interim status. This unit is identified in the 1988 Part A and B permit applications. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved closure plan.

16-010(f): The unit is a pressure filter tank located at TA-16-406. The tank is cone-shaped, 8-feet in diameter, 10-feet high, and constructed of steel. The dimensions and operations of the tank are the same as SWMU 16-010(e). The tank was built in 1965. The tank is used to process waste high explosive process sludge. Within the tank is sand over fine and coarse layers of gravel. The sludge is dried and burned within the tanks. Approximately 750 pounds of sludge can be burned at one time. The tank replaces the use of a filter bed which was taken to TA-54 for disposal. The unit operates under RCRA interim status and 40 CFR 265 Subpart P regulations. This unit is identified in the 1988 Part A and B permit applications. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved closure plan.

16-010(j): The unit was originally a filter bed and was constructed in 1951 to receive high explosive residue wash water from the basket facility. A pipe drained the filtered wash water to the adjacent area southeast of the filter bed. The unit is located at TA-14-394. The unit served as a filter bed by receiving washwater from the production of high explosives. The washwater was dried in the filter bed and then burned. Approximately 400 pounds of high explosives could be burned in one day. After the dried washwater was burned, the unit was raked. The sand in the filter bed was taken to another burn area and reburned. The unit has been modified and is now a 12-feet by 12-feet by 1-foot metal tray filled with 6 to 8 inches of sand used for the open burning of oil contaminated with solvents. There are four shallow steel pans within the tray which are lined with fire bricks. Oil and solvents contaminated with high explosive are poured onto the bricks and ignited. The unit operates under RCRA interim status and 40 CFR 265 Subpart P regulations. This unit is identified in the 1988 Part A and B permit applications. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved closure plan.

16-012(d): The unit is a satellite storage area located on a dock in TA-16-260. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan,

Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(i): The unit is a satellite storage area located at TA-16-300 in Room 102. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(j): The unit is a satellite storage area located in TA-16-303. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(l): The unit is a satellite storage area located at TA-16-304 in Room 103. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(m): The unit is a satellite storage area located in TA-16-306 Room 103. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(n): The unit is a satellite storage area located at TA-16-340. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(p): The unit is a less than 90 day storage area located at TA-16-342 in Room 101. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(t): The unit is a satellite storage area located in TA-16-370, Room 101. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(u): The unit is a satellite storage area located in TA-16-430, Room 3. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-012(x): The unit is a satellite storage area located within TA-16-460. This SWMU is used to temporarily store waste explosives and hazardous wastes in small quantities. The unit has no release history. There is a low release potential to all environmental media from these units. If a release were to occur at one of these units, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

16-013(b): The unit was a container storage area for scrap high explosive. All drums were removed and the area is now part of a museum. At an undetermined time in the past the unit were noted to be leaking. The areas were reportedly cleaned up. The unit presents a low release potential to all environmental media as are no longer managed.

16-018: The unit is located in TA-16 and is known as the Material Disposal Area (MDA) P landfill. The unit occupies 6.71 acres at the edge of Canyon de Valle. The unit was operational from the late 1940's to 1985. The SWMU is an industrial landfill that contains waste from the synthesis, processing, and testing of high explosives. Waste disposed in the unit includes noncombustible debris remaining from burned structures that were contaminated with high explosives. The debris disposed in the landfill was from residuals of old magazines and explosive buildings from TA-6, -9, -11-, and -16. Other wastes include ashes from the incinerator, material suspected of being high explosive contaminated, chemical bottles and buckets, and general trash. A major portion of MDA P has been covered with soil and leveled. The section of the landfill closest to the canyon edge remains uncovered. Waste material from the landfill has fallen into the canyon. The estimated total volume of the landfill is 13,000 cubic yards. Prior to the use of the SWMU as a landfill, it was used as a detonator open burn area. Lead azide and thallium azide detonators may have been burned at the unit. A closure plan has been submitted to NMED for this unit in November 1985. LANL will submit a revised closure plan for this unit by September 1993, per an agreement with the state.

21-003: The unit is a container storage area located at TA-21-61. The unit is has maximum capacity of 5,500 gallons. The container storage area has been active since the 1950s and is currently operational. The unit was used to store polychlorinated biphenyl-contaminated oil. The unit is now used to store mixed waste. The unit has RCRA interim status. A permit application for the operation of this unit will be submitted to NMED by September 1994. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with 40 CFR 265 Subpart I, LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved closure plan.

40-003(a): The unit is a former open detonation area located about 450-feet east of TA-40-15. It was used for the detonation and disposal of scrap high explosive material. A closure plan has been submitted for this site to NMED. The Closure Plan for this unit was approved by NMED in September 1991. Sampling conducted during closure activities has detected hazardous constituents. LANL intends to amend the closure plan to conduct additional sampling and contaminant removal activities during 1993. LANL intends to clean close this unit per RCRA 40 CFR 265 regulations.

53-001(a): The unit is a less than 90-day container storage area located at TA-53-2. Containers are stored on a concrete and asphalt pad. The types of wastes managed include solvents and acids. Staining of the asphalt at the unit was noted in the late 1980s. The unit has no history of release to the environment. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

53-001(b): The unit is a less than 90 temporary storage location The unit manages waste solvents. The unit has no release history. There is a low release potential to all environmental media from this unit. If a release were to occur at this unit, it would be managed in accordance with 40 CFR 262.34(d), LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements.

53-002(a): The unit is comprised of two surface impoundments. The impoundments have been present since 1969. The lagoons are each 210-feet by 210-feet by 6-feet, with a 1.5 million gallon capacity. The liners in the impoundments are a four-inch layer of bentonite on the base of the impoundment and a gunite liner on the sloped sides. are clay-lined. The unit received and store wastewater from TA-53 which were sanitary, radioactive, and industrial wastewaters. The unit has not received wastewater since January 1993. The units operated under RCRA interim status. A closure plan for the unit (surface impoundments) was submitted to the NMED on February 12, 1993. LANL intends to clean close the unit under RCRA 40 CFR 265 regulations.

53-002(b): The unit is a surface impoundment which was constructed in 1985. The unit has a polyethylene liner and is also lined with gunite. Wastewater received includes cooling water from the experimental area of the linear accelerator, leaks in

the accelerator system, and other industrial waste including liquid from the janitors sinks and chemical drains. Radioactive constituents in the wastewater include tritium, beryllium-7, cesium-134, sodium-22, cobalt -57, and other radionuclides. Sludge in the lagoon contains radionuclides and possibly other chemical constituents. The lagoon discharges on an as-needed basis. The outfall is to Los Alamos Canyon. The discharge is regulated by a National Pollutant Discharge Elimination System permit. The unit operates under interim status. This unit is identified in the January 1991 Part A permit application as managing a mixed waste. If a release were to occur at this unit, it would be managed in accordance with LANL's Contingency Plan, Spill Prevention Countermeasures and Control Plan, and/or other administrative requirements. The unit will be closed under an approved RCRA closure plan.

DUPLICATE

16-009(b): This unit was identified in Table A of the Module VIII permit. SWMU 16-009(b) is a former burn area that is located in the MDA R. The MDA R is SWMU 16-019. This unit is (16-019) is also identified in Module VIII of the permit Therefore, 16-009(b) is present in the permit twice as requiring further investigation. The SWMU 16-009(b) is located within the northern portion of the land disposal area that is SWMU 16-019. This former land disposal area will be investigated under the RCRA Facility Investigation Work Plan for OU 1082. This work plan is scheduled for submittal to the Environmental Protection Agency (EPA) on May 23, 1993, in the Module VIII permit and on July 16, 1993, in the permit modification request sent February 16, 1993, to the EPA.