

2020 Permit



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Hazardous & Radioactive Materials Bureau
2044 Galisteo
P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-1557
Fax (505) 827-1544



MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

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September 3, 1996

Mr. Allyn Davis, Director, 6PD
Multimedia Planning and Permitting Division
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Davis:

The New Mexico Environment Department (NMED) would like to address inadequacies in the EPA RCRIS Data Base that prevents the Hazardous and Radioactive Materials Bureau from entering grant commitment activities at Los Alamos National Laboratory (LANL). For two (2) successive years HRMB has completed grant commitments connected to management of the LANL RCRA Permit and not been able to enter the RCRIS Event Codes as required by the Memorandum of Understanding (MOU) due to National RCRIS inadequacies. Each week that HRMB is "locked out" of RCRIS entry the number of activity codes increases. Currently HRMB has approximately 230 entries that need to be made. All that is needed to correct these inadequacies is for the Corrective Action Module to have the maximum number of allowed entries changed from 99 to 9999 and for the RCRIS Permit Module maximum number of allowed entries to change from 999 to 9999. Numerous telephone conversations between your staff, Office of Solid Waste and Emergency Response (OSWER) staff, and my staff which have been followed by written memorandums have failed to resolve the situation.

HRMB has been forced to spend invaluable staff time defending the program and demonstrating that RCRIS reports developed from the RCRIS System are incorrect and incomplete. In order to meet reporting requirements for Grant Commitments which cannot be reported through RCRIS, HRMB will submit a written report detailing completion of grant commitment activities at LANL, and any other facility information which will not fit RCRIS entry parameters. All numbers resulting from incomplete RCRIS data in reference to these grant commitments must be corrected by EPA manually prior to Region 6 completion and presentation of the end-of-year report for FY 1996 to NMED's Upper Management .

On June 18, 1996 your staff visited New Mexico and the HRMB staff to discuss the current status of the RCRIS cleanup activities. During that meeting your staff was given a presentation by my staff on the configuration, verification , validity and



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operation of the New Mexico State Corrective Action Tracking System (SCATS). HRMB staff was promised assistance in completing the cleanup of corrective action RCRIS data at all New Mexico facilities and written acceptance of the SCATS as a valid Corrective Action Database. HRMB finalized the SCATS database without the written approval because they can no longer delay tracking Corrective Action Data.

Another problem recently occurred when EPA was to assist HRMB with deleting multiple D99 entries in the Permitting Module of RCRIS to free up space so that HRMB could enter its Grant Commitment Activities. These D99 entries were made in response to instructions received by the State of New Mexico to enter **all known units** at each facility into RCRIS. What did not happen was the freeing up of entry space when the selected entries were deleted by your staff. On August 27, 1996 our Management Analyst responsible for entering and maintaining RCRIS Grant and MOU information was instructed by your office's, EPA Region 6, database coordinator not to enter or link anything in the LANL sections. As of 9:30 am August 27, 1996 my staff was instructed by their Bureau Chief to develop and initiate the New Mexico State Permit Activity Tracking System (SPATS) to replace RCRIS database for LANL. By 5:00 pm August 27, 1996 my staff had completed design and layout of the SPATS Database and entry of all relevant RCRIS Codes is scheduled to begin August 28, 1996 and be completed by September 5, 1996. SCATS and SPATS data will be the basis of information presented in the written report which will be submitted at the end of the fiscal year to verify meeting Grant Commitments at LANL and any other facility which does not fit into RCRIS.

Due to the limitations of RCRIS and its inability to handle the real activity universe at LANL, HRMB will not enter more data in the RCRIS database for LANL and other facilities with activity numbers too large for RCRIS to handle. New Mexico has adopted, by reference, all Data Element Dictionary (DED) and regional RCRIS codes for use in SCATS and SPATS making these databases all inclusive and much more detailed than RCRIS is capable of handling. New Mexico has officially requested additional codes to record important activities not in the DED or Regional Code List and that request is now in the process of approval.

EPA has no access to the personal computer that contains SCATS or SPATS. However, EPA may request, with ten calendar day notice, information contained in SCATS or SPATS as long as sufficient detail is included in the request to describe the specific information needed. Should EPA request that information be submitted on a diskette they should submit a 100 megabyte 3.5" floppy disk for an Iomega Zip Drive. Due to risk of database adulteration by use of multiple disks HRMB will not place SCATS or SPATS on 3.5" High Density Double Sided Disks.

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NMED requests your concurrence with this proposal within thirty (30) calendar days of your offices receipt of this correspondence. Should you or your staff have any questions concerning this correspondence please contact myself or Ms. Norma Silva, Program Manager or Mr. Robert S. (Stu) Dinwiddie, LANL Facility Manager, SCATS and SPATS Developer, at the above address or by telephone at (505) 827-1561.

Sincerely,



Dr. Ed Kelley
Division Director
Water and Waste Management

cc: David Updike, OSWER, EPA Headquarters
Dona Inman, OSWER, EPA Headquarters
Steve Gilrein, EPA Region 6
Charles Faultry, EPA Region 6
David Neleigh, EPA Region 6
Cathy Carter, EPA Region 6
Norma Silva, HRMB, Program Manager
Robert S. (Stu) Dinwiddie, LANL Facility Manager