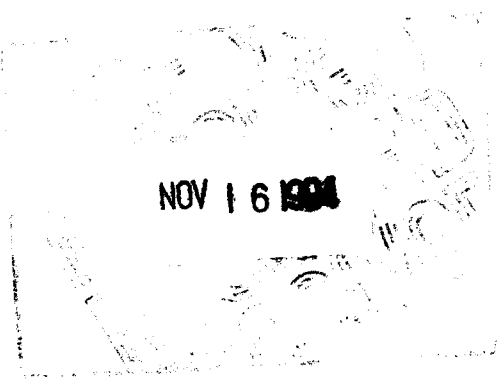




TA-3
real file

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

NOV 10 1994



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Coby Muckelroy
Enforcement Program Manager
RCRA Inspections
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
525 Camino de los Marquez
Santa Fe, New Mexico 87502

Dear Mr. Muckelroy:

The Department of Energy (DOE) and the University of California (UC), as management and operations contractor for Los Alamos National Laboratory (LANL), request a 30-day extension for storage of mixed waste at a less than 90-day storage area located in Technical Area (TA) 3 on Sigma Mesa. The purpose of this request is to allow continued temporary storage of hazardous waste generated by the Environmental Restoration (ER) Project. The location of generation is considered off-site although within the historical boundary of LANL. We are currently discussing this issue with the New Mexico Environment Department (NMED) and hope to have resolution allowing on-site storage and treatment by LANL. The regulatory citation for this request is found in the New Mexico Hazardous Waste Management Regulations (20 NMAC 4.1) Part 262.34(b).

Vitrified clay pipe from the Former Western Sanitary Waste Line, known as Solid Waste Management Unit (SWMU) 1-001(s) is stored at the TA-3 waste storage location in question. The source of the waste was a remediation site located in the townsite of Los Alamos. Waste was first moved onto this less than 90-day storage area on July 18, 1994. Per NMED's faxed approval for this extension request, the 30-day extension period will run from November 4, 1994 to December 4, 1994.

NMED was contacted on July 18 and 20, 1994, to obtain provisional EPA Identification Numbers (ID NOs) (NMP 360040785/360040797) as a precautionary measure. At that time, the vitrified clay pipe was not considered to be a RCRA hazardous waste based on previous sampling results collected from both inside and outside the pipe. Analytical data collected from material inside the pipe during the pipe removal phase detected elevated concentrations of lead and cadmium. The Toxicity Characteristic Leaching Procedure (TCLP) was performed on several samples that had elevated lead and cadmium concentrations. The TCLP analytical results indicate that the waste fits the criteria for D006 and D008.

LANL plans to proceed with the process identified in the October 19, 1994 NMED letter regarding their permit modifications dated October 14, 1994.

TK



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NOV 10 1994

Mr. Coby Muckelroy

2

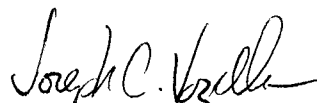
This letter directs LANL to obtain a provisional EPA ID NO. on a site by site basis, rather than a shipment by shipment basis.

As you know, LANL is required to investigate and remediate areas of contamination located outside current LANL boundaries under the RCRA Corrective Action portion of our RCRA Hazardous Facility Permit. The purpose of our discussions with NMED regarding how to manage these wastes generated by the ER Project have been to resolve a condition of our RCRA Permit which does not allow "off-site" waste to be received by LANL. Currently, there are over 100 SWMUs and Areas Of Concern (AOCs) LANL will be investigating at locations considered to be off-site. Due to the diverse nature of these SWMUs, LANL cannot predict whether or not investigation and/or remediation of these units will generate hazardous waste. Therefore, it is prudent that a mutually acceptable strategy be developed for dealing with such wastes.

Transporting any waste from the off-site SWMUs and AOCs to an on-site location is perceived by LANL to be the most responsible means of dealing with the waste. Waste brought on-site can be kept in more secure locations than those off-site. We believe that waste from ER off-site locations can be appropriately managed at on-site permitted and interim status RCRA Treatment and Storage Units.

Thank you for your cooperation on obtaining a 30-day extension for the 90-day storage limit for the waste at TA-3. We look forward to the resolution of this issue during our meeting scheduled for November 8, 1994.

Sincerely,



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

LAAMEP:2JM-016

cc:
See page 3

NOV 10 1994

Mr. Coby Muckelroy

3

cc:

B. Driscoll

RCRA Permits Branch

U. S. EPA Region 6

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B. Garcia

Hazardous Waste Bureau

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