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HEALTH AND ENVIRONMENT  
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*TA-SC - TA-14  
TA-50  
TA-16*

CERTIFIED MAIL RETURN RECEIPT REQUESTED

April 20, 1988

Mr. Harold Valencia  
D.O.E. Area Manager  
Los Alamos Area Office  
Los Alamos, NM 87544

RE: NM0890010515  
Changes during Interim Status

Dear Mr. Valencia:

It has come to our attention that DOE letter of November 25, 1987 was intended to serve both as a transmittal of the fourth edition of your Part B RCRA permit application and a request for approval in accordance with the Hazardous Waste Management Regulations (HWMR-4), Section 302.C.3. of changes made during interim status. We apologize for the delay in responding to this latter purpose.

The following paragraph numbers correspond to those in your letter.

1.A. The changes to the Part A treatment codes to reflect "T03" incineration are approved with the following exceptions:

D003. Lithium Hydride incineration. We believe this may be an unsafe treatment for this material and question your intent to incinerate it.

F001. This waste category includes chlorinated fluorocarbons. The trial burn did not demonstrate acceptable destruction of these compounds, therefore LANL is not approved for incineration of Freon 11 or Freon 12.

F002. This waste category includes Freon 11. LANL is not approved for incineration of Freon 11.

F027 and F028. The test burn failed to demonstrate acceptable destruction of these two wastes in solid form. Therefore only liquid forms of these wastes may be incinerated under interim status.

F003 and D003 are the only waste categories allowed to be incinerated by the TA-16 industrial incinerator.



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1.B. Increases in maximum capacity are approved as follows:

S01. 17,170 gallons of liquids and/or solids on storage pads similar to the one at TA-54, Area L, Structure 37. A total of 34,340 gallons on two storage pads, the second to be constructed at TA-50.

S01. 1650 gallons of liquids and/or solids in modular storage units. A total of 4950 gallons in three modular units.

S01. 3600 drums of 55 gallon nominal capacity containing solidified wastes stored at TA-54, Area L.

S01. 440 gallons of liquids and/or solids in the packaging building in TA-54, Area L.

S01. 3630 gallons of liquid and/or solid wastes in TA-50, Building 37, Room 117.

S01. An aggregate total of the above units of 241,360 gallons of liquid and/or solid wastes. Individual areas may not exceed the quantities given above.

S02. Storage in tanks at TA-54, Area L. A total of 5700 gallons stored in four tanks with a minimum freeboard of 6 inches per tank.

S04. 500 gallons, no change. The surface impoundment at TA-54, Area L is awaiting closure.

T02. 500 gallons per day, no change. The surface impoundment at TA-16 is awaiting closure.

T03. Incinerator capacity is increased to 0.56 tons per hour. This applies only to the controlled air incinerator at TA-50, Building 37 and the industrial incinerator at TA-16 which is to replace the open burn cage.

T04. Cementation treatment of barium-containing sands at 2534 gallons per day, conducted at TA-54, Area L only.

2. Modification of the controlled air incinerator at TA-50. These modifications have already begun, making EID approval moot. Ex post facto recognition of these modifications is given without any commitment as to their acceptability for permitting purposes. The modification of the effluent control system after the trial burn may negate the results of the trial burn and lead to reaccomplishing the trial burn. Failure to notify prior to modification of the unit may violate HWMR-4, Section 302.C.3.c.

3. Modifications to the Batch Waste Treatment Unit at TA-50. These modifications have already begun, making EID approval moot. Ex post facto recognition of these modifications is given without any commitment as to their acceptability for permitting purposes. Failure to notify prior to modification of the unit may violate HWMR-4, Section 302.C.3.c.

4. T04 cementation at TA-54, Area L is approved. Your statement that off-site disposal is not acceptable implies that you intend to dispose of this material on-site. This disposal is not reflected in either your Part A or Part B and storage for an open-ended time period is not acceptable to EID. What do you intend to do with this material after it is solidified?

5. S01 storage facility at TA-50, Building 37, room 117 is

approved for 3630 gallons as described in the Part B.

6. S01 storage pad at TA-50 is approved for 17,170 gallons.
7. T04 open burn cage at TA-14 listing is disapproved. You describe this as a relisting; when did LANL first notify of this unit? Where is this unit described?
8. Revision of LANL plans do not require approval for interim status as long as the regulatory requirements are met.
9. Approval of an incinerator to replace the open burn cage at TA-16 is granted, subject to the limitations above and in your letter.

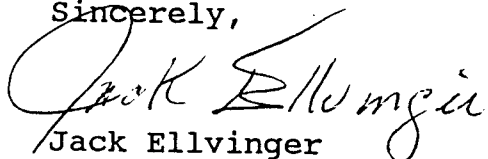
The above approvals under interim status are granted in accordance with HWMR-4, Section 302.C.3. These approvals are not to be construed as approval for permitting purposes or assurances that any activity or quantity approved under interim status will be approved in any permit. You are reminded that all the above units are required to meet the requirements of HWMR-4 as of your receipt of this letter.

I am concerned that the Part B permit application submitted by LANL appears to be a dynamic document. Your correspondence of November 25, 1987 accompanying your fourth submittal states that two storage containers, certified in your third submittal as existing, do not exist. It appears that LANL has not truly identified their wastes and processes accurately enough to provide a valid Part B application. Should this prove to be true the EID will have no alternative but to deny the application under Section 302.A.1.b.(2)(c) of the Hazardous Waste Management Regulations.

Several of the changes above were prompted by the last inspection of LANL and are the subject of EID Notice of Violation dated January 8, 1988. This correspondence does not abrogate any violations cited in that NOV.

If you have any questions please call Mr. C. Kelley Crossman on my staff at 827-2923.

Sincerely,



Jack Ellvinger  
Chief, Hazardous Waste Bureau

cc: Tanga Winkle, EPA 6H-HS  
Cubia Clayton, Air Quality Bureau  
Boyd Hamilton, Acting Program Manager, Hazardous Waste  
Michael Brown, EID District II