



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

file CANC

MAY 12 1995

TA-16

TA 16

Ms. Barbara Hoditschek
Program Manager
RCRA Permitting Program
Hazardous and Radioactive Materials
Bureau
New Mexico Environment Department
525 Camino de los Marquez
P. O. Box 26110
Santa Fe, New Mexico 87502



Dear Ms. Hoditschek:

When we were at your offices you brought up some concerns about the potential contamination of TA-16 MDA-P by the continuing operation of the open burn pad. This had been discussed previously when we briefed you concerning the proposed clean closure of TA-16 MDA-P. It was again discussed when we met late in April and briefed you further on the activities at that location.

At that time, you indicated that you needed us to submit the permit application for the burn pad with adequate assurances in it that it would not contaminate the MDA-P site once it was clean closed. You also suggested that we provide assurances to this effect if that permit application would not be submitted prior to the deadline on the TA-16 MDA-P. At the April meeting you suggested that we offer a characterization of the burn pad site as part of the permit application for TA-16 to insure that existing waste was identified and any new contamination from further operation of that site could be distinguished.

The purpose of this letter is to discuss with you several of the steps that have been taken to contain contamination from the operation of the open burn pad. LANL has been working on this issue for some time. LANL (specifically ESA Division) has been reengineering the burn pad site so that air emissions and any potential run-on and run-off is limited to the extent possible. Some of the steps that have been taken include the following:

- A diversionary drainage ditch has been installed to prevent any run-off from the top of the mesa from entering MDA-P.
- The reengineering effort mentioned above has led to the design for a movable cover which is currently being procured and will be included in the permit application. This cover will protect the pad from precipitation.
- Another product of the above effort is the installation of propane burners. These will be used in place of the wood fuel/bonfire configuration that is currently employed to treat the high explosive contaminated material. This will reduce emissions from the treatment process.



MAY 12 1995

Ms. Barbara Hoditschek

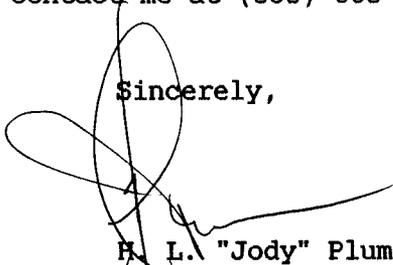
2

- The current standard operational procedure for this facility requires that the pad be cleaned within a day following the completion of the treatment process. This limits the time frame during which material might be moved by the weather off the treatment area.
- The predominate wind direction at the treatment location is away from the MDA-P site. This will be detailed in the permit application for this site.
- ESA Division has an active program which is seeking out alternative treatments to handling high explosive contaminated waste. Bioremediation and base hydrolysis are but two of those being explored.
- ESA Division is working with other Groups within the laboratory to better understand the current treatment process. They are looking at new air monitoring technologies to study this treatment process.
- ESA Division has developed and implemented programs to eliminate or minimize the volume of waste that requires treatment at this location.

As you can see by the above discussion, much is being done at this location to limit or eliminate waste treatment and the potential for movement of wastes from the treatment location. We hope that this information is useful in your review of the activities at the TA-16 areas. If you think that it would be of benefit to you and/or your staff to view/tour this location, please let us know what times and dates are convenient for you. Fridays are best due to the fact that these locations are on compressed work weeks and no activities will be going on those days that would prohibit your entry in one or another of the locations.

Thank you for your consideration of this information. If we can be of further assistance or if you wish to set up a tour of the TA-16 treatment sites, please feel free to contact me at (505) 665-5042, or Jon Mack at (505) 665-5026.

Sincerely,



H. L. "Jody" Plum
Office of Environment
and Projects

LAAMEP:2JP-002

cc:

Jack Ellvinger, ESH-19, LANL,
MS-K490

Cindy Sandoval, ESA-WMA, LANL,
MS-C930

Ed Hyde, ESA-WMA, LANL, MS-C930

Hilary Noskin, ESH-19, LANL,
MS-K490

Tony Grieggs, ESH-19, LANL,
MS-K498