



Department of Energy

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

JUN 17 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Dr. Stuart Dinwiddie
Permit Program Manager
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505

Dear Dr. Dinwiddie:

Subject: Los Alamos National Laboratory (LANL) Request for Temporary Authorization for Technical Area (TA) 16-388 Open Burn Units

The purpose of this letter is to request a Temporary Authorization in accordance with 40 CFR Part 270.42 for the TA-16-388 Open Burn Unit. A Resource Conservation and Recovery Act (RCRA) Part B Permit Application for TA-16 was submitted to the New Mexico Environment Department Hazardous and Radioactive Materials Bureau (NMED/HRMB) on June 29, 1995. 40 CFR Part 270.42 requires facilities to provide a description of the activities to be conducted under the temporary authorization, an explanation of why the temporary authorization is necessary, and sufficient information to ensure compliance with 40 CFR Part 264 standards.

On February 18, 1997, NMED approved the closure of Material Disposal Area P (MDAP). NMED suggested that LANL continue to use the TA-16-387 Open Burn Unit until the MDAP closure process is complete. NMED proposed that the TA-16-388 Open Burn Unit be constructed away from MDAP at the TA-16 Burn Grounds. Currently, the TA-16-388 Open Burn Unit is under design for the relocation of the burn tray and flash pad operations, as verbally approved by you on September 23, 1996. In order to continue construction of the TA-16-388 Open Burn Unit, it was suggested by NMED/HRMB that LANL request a Temporary Authorization under 40 CFR Section 270.42. Rationale for the TA-16-388 Temporary Authorization is listed below:

I. Description of Activities to be Conducted at TA-16-388 Under the Temporary Authorization

Several kinds of HE-contaminated waste materials will be treated at the TA-16-388 Open Burn Unit:

- Inert-mock explosives - may contain oxidizers



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- Solid chunk - includes consolidated turnings, reject parts, and excess HE
- Sludge - HE sludge that settles out of wastewater from HE-processing facilities
- Waste oil/solvents - assumed to be contaminated with HE
- Scrap - any machinery, equipment, or furniture used in HE-processing areas is considered potentially contaminated with HE and is not allowed to leave the area until any HE has been removed.

These waste materials are generated from HE production facilities and HE research and development facilities located at LANL.

The TA-16-388 Open Burn Unit will also be used for destroying any HE on contaminated debris from remediation and closure of MDAP. Types of waste associated with the MDAP include personal protective clothing, disposal sampling equipment, liquids and sludge from decontamination, debris, and soil/tuff from the waste pile. The TA-16-387 Open Burn Unit will run simultaneously with the TA-16-387 unit in order to facilitate closure process activities at the MDAP. The TA-16-387 unit will undergo closure process after the completion of MDAP closure activities.

II. Necessity for TA-16 Temporary Authorization

The following points are reasons for the necessity of a temporary authorization to continue construction of the TA-16-388 Open Burn Unit:

- MDAP covers a relatively large area (approximately 7 acres) and waste disposal occurred over a relatively long period of time (approximately 30 years); therefore, a large volume of waste has been stored in MDAP. Operation of the TA-16-388 Burn Pad is necessary to effectively treat such a large volume of waste.
- The waste must be treated or disposed of in a timely fashion to avoid storage of waste associated with remediation and closure activities at the MDAP, therefore requiring the need for the existence and operation of the TA-16-388 Open Burn Unit. The operation of the TA-16-388 Open Burn Unit will also eliminate any regulations associated with RCRA storage requirements.
- The HE waste associated with HE production and HE research and development facilities must also be treated in a timely fashion.

III. Compliance with 40 CFR Part 264 Standards

As subject to NMED's determination of the TA-16 Permit Application's completion, LANL believes that all requirements under 40 CFR Part 264 standards have been met. RCRA Part B Permit Application requirements under 40 CFR 270.14 address compliance issues associated with 40 CFR Part 264 standards. Please refer to the submitted TA-16 RCRA Part B Permit Application for compliance issues under 40 CFR Part 264 standards.

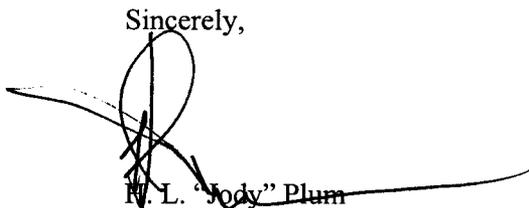
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If you have any questions regarding this request, please contact me at (505) 665-5042.

Sincerely,

A handwritten signature in black ink, appearing to be 'W. L. 'Jody' Plum'. The signature is stylized with a large loop at the beginning and a long horizontal stroke extending to the right.

W. L. "Jody" Plum

Office of Environment and Projects

LAAMEP:3JP-044

cc:

Benito J. Garcia, Chief

Hazardous and Radioactive Materials Bureau

New Mexico Environment Department

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