

Los Alamos

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ESH-19:98-016

January 29, 1998

Dear Interested Citizen

**SUBJECT: PUBLIC NOTICE - REQUEST FOR A TEMPORARY AUTHORIZATION
TO BEGIN MODIFYING AN OPEN BURN PAD AT TECHNICAL AREA 16
(TA-16)**

The purpose of this letter is to inform the public of the Los Alamos National Laboratory's (LANL's) request to the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB) for a temporary authorization to begin modifying an open burn pad at Technical Area 16 (TA-16). Open burning is used on-site to destroy high explosives because transporting high explosives-contaminated wastes off-site for treatment is extremely dangerous. The authorization is necessary because cleanup activities of an old high explosives waste disposal site, referred to as Material Disposal Area P (MDA-P), cannot be accomplished on schedule without this change. LANL has submitted the required permit application that addresses these changes and all other operations at the TA-16 hazardous waste pad. This application is currently under review by NMED/HRMB.

High explosives-contaminated materials cannot be removed from the area until they are "flushed," a term which means to heat an object up to a temperature where the high explosives will be destroyed. LANL currently has one flash pad (TA-16-387) that uses wood fuel to heat up the high explosives-contaminated equipment. The additional volume of material from MDA-P requires greater capacity than TA-16-387 has to flash materials. Therefore, LANL wishes to convert an existing burn pad (TA-16-388), not currently used for flashing, into another flash pad to help handle the additional volume of waste. Until the MDA-P project is completed, both flash pads (TA-16-386 and -387) would be used. The TA-16-387 pad will no longer be used after MDA-P is complete.

The temporary authorization will expedite the purchase and installation of propane burners and weather protection apparatus. Propane burners will be used instead of wood fuel at TA-16-388. Propane is a much cleaner fuel and the temperature of the burn can be much better controlled than using wood. This change is a major improvement because it will:

- reduce the amount of waste by improving verification of high explosives destruction, which will enable reuse or recycling of flashed materials, as appropriate;
- significantly reduce air pollutant emissions;
- significantly reduce the generation of ash resulting from the burning of wood; and
- allow closure of the old wood-burning flash and oil/solvent burning pads once the MDA-P cleanup is completed.



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Following is a description of the activities conducted at the pads and the justification and need for the temporary authorization. Regulations are cited, as appropriate.

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

Several kinds of high explosives-contaminated waste materials will be treated at the TA-16-388 flash pad:

- high explosives-contaminated debris generated by the remediation and closure of MDA-P, including personal protective clothing, disposable sampling equipment, debris, and soil/tuff from the waste pile;
- waste oil/solvents contaminated with high explosives;
- high explosives-contaminated materials (machinery, equipment, etc.) from production and operation areas; and
- wastes, such as equipment and building materials, associated with decontamination and decommissioning (D&D) of buildings that are contaminated with high explosives.

The TA-16-388 flash pad will run simultaneously with the TA-16-387 pad in order to facilitate closure activities at the MDA-P and guarantee adequate capacity for the operational wastes generated during this time frame. When MDA-P is completed, TA-16-387 will no longer be used and TA-16-388 will become the only flash pad.

Need and Justification for TA-16-388 Temporary Authorization

NMAC 4.1 Subpart IX 270.42(e)(3) requires that NMED find that:

- the authorized activities are in compliance with the standards of NMAC 4.1 Subpart V 264, and
- the temporary authorization achieves at least one of a list of objectives.

Regarding the first point, LANL has already submitted the TA-16 RCRA Part B Permit Application, which demonstrates compliance with all requirements under NMAC 4.1 Subpart V 264.

Regarding the second point, one of the objectives listed as justification for a temporary authorization is:

"To facilitate timely implementation of closure or corrective action activities" - NMAC 4.1 Subpart IX 270.42(e)(3)(ii)(A).

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The purpose for converting TA-16-388 into a flash pad is directly related to this objective. It will facilitate the timely and efficient closure of MDA-P (discussed earlier). The closure plan for this disposal area has been approved by NMED and closure activities have already commenced. Without the temporary authorization, LANL cannot treat the waste generated from MDA-P in a timely manner, which would delay closure.

NMAC 4.1 Subpart IX 270.42(e)(3)(ii)(C) lists another objective as justification for a temporary authorization:

"To prevent disruption of ongoing waste management activities."

Without the capability to flash at TA-16-388, LANL will be unable to handle the waste generated by closure activities at MDA-P, as well as the operational wastes generated on a daily basis by LANL. Waste management activities would be disrupted.

LANL would be happy to answer any questions concerning this public notice. Please feel free to me, Jack Ellvinger, with LANL's Environmental Safety and Health Division, at (505) 667-0633, or contact me via e-mail at ellvinger_jack_e@lanl.gov.

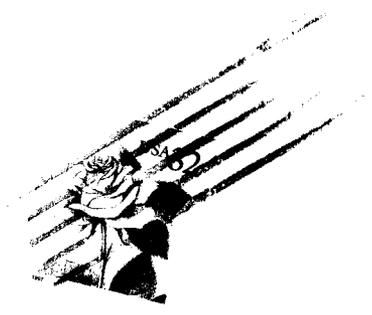
Sincerely,


Jack Ellvinger
Hazardous & Solid Waste

JEE:em

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ESH-19 Circ File

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