

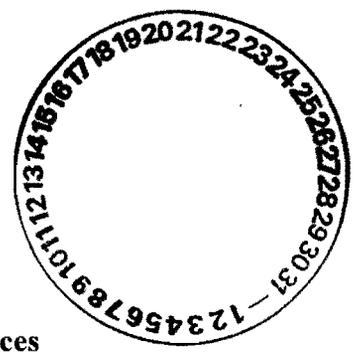
TA-36



Ideas That Change the World
Solid Waste Regulatory Compliance
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/Fax (505) 667-5224

Date: April 20, 2004
Refer To: SWRC:04-027

Mr. Carl Will
Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303



Dear Mr. Will:

Subject: Clarification of Operational and Waste Management Practices

Pursuant to a discussion between Ann Sherrard and Lee Winn on March 17, 2004, we are submitting a revised page G-5 to the Los Alamos National Laboratory Technical Area 16 Part B Permit Renewal Application. This page clarifies that the units are also used for operations that do not require permitting under the Resource Conservation and Recovery Act. Attachment 1 shows in redline/strikeout the changes that were made. Attachment 2 contains three double-sided copies of the revised pages G-5 and G-6 for inclusion in New Mexico Environment Department's copies of the permit application. Page G-6 was revised only in that the changes moved part of the original text on page G-5 to page G-6.

We appreciate your assistance in ensuring that the use of the units is clear in our application.

Sincerely,

Tony Grieggs
Acting Group Leader

TG:AS:vc

- Enc: 1) Attachment 1, Redline/Strikeout Version of the Proposed Changes
- 2) Attachment 2, Revised pages G-5 and G-6



Attachment 1
Redline/Strikeout Version of the Proposed Changes

into a container and the apparatus would be refilled from a hopper. A second method is to continuously release the material from a hopper, through a flame, and into a container. A third device required may be steel stands on which HE-contaminated pipes are supported. As waste types change, other devices may be needed to effectively treat the wastes.

G.1.2 TA-16-399 HE Burn Tray

The TA-16-399 HE Burn Tray is a 4-ft-wide, 16-ft-long steel tray, supported on 1.5-ft-high legs, and lined with firebricks (Figure G-5). The treatment capacity of the TA-16-399 HE Burn Tray is 1,000 pounds of waste per burn. Explosives to be burned, usually rejects from pressing and machining operations and also HE pieces that are no longer useful, are transported to the HE burn tray packed in cardboard and wooden boxes. Padding is placed on the tray and the explosives are removed from the boxes and set on the padding. The padding is then dampened with kerosene, electric matches (squibs) are connected to the firing cables, and a train of excelsior saturated with kerosene is run from the squibs to the padding. All personnel then go to the Control Building and the squibs are fired remotely. The burn is observed by Burn Ground personnel located in the Control Building, using a television camera located near TA-16-388 and a monitor and a periscope located in the Control Building. The ash is later inspected for unburned HE or other residues that do not appear to be fully treated. The cover of the TA-16-399 HE Burn Tray is placed over the residue until it can either be treated again on the burn tray or on the TA-16-388 Flash Pad.

Between burns, the TA-16-399 HE Burn Tray is covered, unless an ash sample is being collected, ash is being removed, or waste is being staged. The portable cover or a tarp is used to cover the unit.

G.2 OPERATIONAL AND WASTE MANAGEMENT PRACTICES

The OB units at TA-16 treat ~~only hazardous~~ solid and liquid wastes that are either pure HE or contaminated with HE. If the material is a hazardous waste, it is treated to meet the RCRA treatment standards. If the waste is not a hazardous waste but is HE-contaminated (e.g., very low levels of HE on scrap metal), it is flashed to meet the Department of Energy Explosives Safety Manual (DOE M 440.1-1; DOE, 1996) requirement all HE be removed before releasing materials to the public. This section describes the operational and waste management practices used to stage and treat the waste, as well as the disposition of residues. Information on treatment effectiveness; ignitable, reactive, and incompatible wastes; security and access;

Attachment 2
Revised pages G-5 and G-6

into a container and the apparatus would be refilled from a hopper. A second method is to continuously release the material from a hopper, through a flame, and into a container. A third device required may be steel stands on which HE-contaminated pipes are supported. As waste types change, other devices may be needed to effectively treat the wastes.

G.1.2 TA-16-399 HE Burn Tray

The TA-16-399 HE Burn Tray is a 4-ft-wide, 16-ft-long steel tray, supported on 1.5-ft-high legs, and lined with firebricks (Figure G-5). The treatment capacity of the TA-16-399 HE Burn Tray is 1,000 pounds of waste per burn. Explosives to be burned, usually rejects from pressing and machining operations and also HE pieces that are no longer useful, are transported to the HE burn tray packed in cardboard and wooden boxes. Padding is placed on the tray and the explosives are removed from the boxes and set on the padding. The padding is then dampened with kerosene, electric matches (squibs) are connected to the firing cables, and a train of excelsior saturated with kerosene is run from the squibs to the padding. All personnel then go to the Control Building and the squibs are fired remotely. The burn is observed by Burn Ground personnel located in the Control Building, using a television camera located near TA-16-388 and a monitor and a periscope located in the Control Building. The ash is later inspected for unburned HE or other residues that do not appear to be fully treated. The cover of the TA-16-399 HE Burn Tray is placed over the residue until it can either be treated again on the burn tray or on the TA-16-388 Flash Pad. Between burns, the TA-16-399 HE Burn Tray is covered, unless an ash sample is being collected, ash is being removed, or waste is being staged. The portable cover or a tarp is used to cover the unit.

G.2 OPERATIONAL AND WASTE MANAGEMENT PRACTICES

The OB units at TA-16 treat solid and liquid wastes that are either pure HE or contaminated with HE. If the material is a hazardous waste, it is treated to meet the RCRA treatment standards. If the waste is not a hazardous waste but is HE-contaminated (e.g., very low levels of HE on scrap metal), it may be flashed to meet the Department of Energy Explosives Safety Manual (DOE M 440.1-1; DOE, 1996) requirement all HE be removed before releasing materials to the public. This section describes the operational and waste management practices used to stage and treat the waste, as well as the disposition of residues. Information on treatment effectiveness; ignitable, reactive, and incompatible wastes; security and access; preparedness and prevention; and volatile organic air emissions standards are also presented herein. The waste streams treated at these units are described in Table B-6 of Appendix B in

into a container and the apparatus would be refilled from a hopper. A second method is to continuously release the material from a hopper, through a flame, and into a container. A third device required may be steel stands on which HE-contaminated pipes are supported. As waste types change, other devices may be needed to effectively treat the wastes.

G.1.2 TA-16-399 HE Burn Tray

The TA-16-399 HE Burn Tray is a 4-ft-wide, 16-ft-long steel tray, supported on 1.5-ft-high legs, and lined with firebricks (Figure G-5). The treatment capacity of the TA-16-399 HE Burn Tray is 1,000 pounds of waste per burn. Explosives to be burned, usually rejects from pressing and machining operations and also HE pieces that are no longer useful, are transported to the HE burn tray packed in cardboard and wooden boxes. Padding is placed on the tray and the explosives are removed from the boxes and set on the padding. The padding is then dampened with kerosene, electric matches (squibs) are connected to the firing cables, and a train of excelsior saturated with kerosene is run from the squibs to the padding. All personnel then go to the Control Building and the squibs are fired remotely. The burn is observed by Burn Ground personnel located in the Control Building, using a television camera located near TA-16-388 and a monitor and a periscope located in the Control Building. The ash is later inspected for unburned HE or other residues that do not appear to be fully treated. The cover of the TA-16-399 HE Burn Tray is placed over the residue until it can either be treated again on the burn tray or on the TA-16-388 Flash Pad. Between burns, the TA-16-399 HE Burn Tray is covered, unless an ash sample is being collected, ash is being removed, or waste is being staged. The portable cover or a tarp is used to cover the unit.

G.2 OPERATIONAL AND WASTE MANAGEMENT PRACTICES

The OB units at TA-16 treat solid and liquid wastes that are either pure HE or contaminated with HE. If the material is a hazardous waste, it is treated to meet the RCRA treatment standards. If the waste is not a hazardous waste but is HE-contaminated (e.g., very low levels of HE on scrap metal), it may be flashed to meet the Department of Energy Explosives Safety Manual (DOE M 440.1-1; DOE, 1996) requirement all HE be removed before releasing materials to the public. This section describes the operational and waste management practices used to stage and treat the waste, as well as the disposition of residues. Information on treatment effectiveness; ignitable, reactive, and incompatible wastes; security and access; preparedness and prevention; and volatile organic air emissions standards are also presented herein. The waste streams treated at these units are described in Table B-6 of Appendix B in

into a container and the apparatus would be refilled from a hopper. A second method is to continuously release the material from a hopper, through a flame, and into a container. A third device required may be steel stands on which HE-contaminated pipes are supported. As waste types change, other devices may be needed to effectively treat the wastes.

G.1.2 TA-16-399 HE Burn Tray

The TA-16-399 HE Burn Tray is a 4-ft-wide, 16-ft-long steel tray, supported on 1.5-ft-high legs, and lined with firebricks (Figure G-5). The treatment capacity of the TA-16-399 HE Burn Tray is 1,000 pounds of waste per burn. Explosives to be burned, usually rejects from pressing and machining operations and also HE pieces that are no longer useful, are transported to the HE burn tray packed in cardboard and wooden boxes. Padding is placed on the tray and the explosives are removed from the boxes and set on the padding. The padding is then dampened with kerosene, electric matches (squibs) are connected to the firing cables, and a train of excelsior saturated with kerosene is run from the squibs to the padding. All personnel then go to the Control Building and the squibs are fired remotely. The burn is observed by Burn Ground personnel located in the Control Building, using a television camera located near TA-16-388 and a monitor and a periscope located in the Control Building. The ash is later inspected for unburned HE or other residues that do not appear to be fully treated. The cover of the TA-16-399 HE Burn Tray is placed over the residue until it can either be treated again on the burn tray or on the TA-16-388 Flash Pad. Between burns, the TA-16-399 HE Burn Tray is covered, unless an ash sample is being collected, ash is being removed, or waste is being staged. The portable cover or a tarp is used to cover the unit.

G.2 OPERATIONAL AND WASTE MANAGEMENT PRACTICES

The OB units at TA-16 treat solid and liquid wastes that are either pure HE or contaminated with HE. If the material is a hazardous waste, it is treated to meet the RCRA treatment standards. If the waste is not a hazardous waste but is HE-contaminated (e.g., very low levels of HE on scrap metal), it may be flashed to meet the Department of Energy Explosives Safety Manual (DOE M 440.1-1; DOE, 1996) requirement all HE be removed before releasing materials to the public. This section describes the operational and waste management practices used to stage and treat the waste, as well as the disposition of residues. Information on treatment effectiveness; ignitable, reactive, and incompatible wastes; security and access; preparedness and prevention; and volatile organic air emissions standards are also presented herein. The waste streams treated at these units are described in Table B-6 of Appendix B in