



TA35

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

NOV 02 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. Kelley Crossman
Permitting Supervisor
Hazardous Waste Section
N. M. Environmental Improvement Division
P. O. Box 968
Santa Fe, NM 87504-0968

Dear Mr. Crossman:

The following is provided in response to your September 16, 1988 request for additional information on two surface impoundments at Technical Area (TA) 35 and an updated Environmental Protection Agency Form 3510-3.

On June 9, 1988, the surface impoundments at TA-35 were sampled. Information regarding the sampling and analytical results specific to these impoundments is detailed in the Department of Energy (DOE) letter dated September 26, 1988 to Mr. Saladen of EID (see enclosures). The analytical results were transmitted to the Environmental Surveillance Group (HSE-8) from the Health and Environmental Chemistry Group (HSE-9) on June 21, 1988. Also, on June 21, 1988, DOE, and Laboratory staff orally informed EID staff that analytical results revealed the presence of Resource Conservation and Recovery Act (RCRA) listed hazardous wastes in the TA-35 surface impoundments. At that time the Laboratory committed to supply additional information and closure plans through official DOE correspondence which was done on August 18, 1988 (see enclosures). The Laboratory transmitted the above information to my office on August 9, 1988. The information, specific to the surface impoundments at TA-35, was forwarded to Michael Burkhart, EID Director, via the DOE letter dated August 18, 1988. Today's letter, together with DOE's correspondence of August 18, 1988, and September 26, 1988, constitute all correspondence related to this matter.

On June 21, 1988, HSE-8 held a meeting with the Laboratory's Chemical and Laser Sciences Division (CLS) to discuss the serious implications of RCRA listed waste being present in the TA-35 surface impoundments (CLS Division is the custodian of the impoundments at TA-35). At the meeting a comprehensive strategy was developed that focused on quick corrective actions and environmental protection. The strategy was: (1) to stop all flow to the impoundments, and (2) to begin immediately arranging for the liquid from the impoundments to be shipped off-site to a permitted hazardous waste disposal facility.



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HAZARDOUS WASTE SECTION

In the weeks that followed, the following actions were taken: (1) floor drains within TA-35 Building 125 and 85 were plugged; (2) liquid in the impoundments was shipped to an EPA approved hazardous waste disposal facility; and (3) site tours and interviews were conducted by both CLS management and HSE personnel for the purpose of assuring that all flow into the impoundments was eliminated. The occupants in the buildings were instructed on the regulatory requirements, new operating conditions, and proper handling and disposal procedures for hazardous waste.

Presently, the Laboratory is in the process of amending the Part A (EPA Form 3510-3) to include miscellaneous units (40 CFR 264, Subpart X) for submittal by November 8, 1988 in accordance with 40 CFR 270.73 (f). We wish to make one comprehensive updated Part A submittal that will include miscellaneous units and the TA-35 surface impoundments on or before November 8, 1988. Furthermore, per DOE's August 18, 1988 letter, RCRA closure plans for the surface impoundments at TA-35-125 and TA-35-85 were submitted to you on October 17, 1988.

Please contact Donna Lacombe (667-5288) should you have further questions.

Sincerely,



Harold E. Valencia
Area Manager

2dml-007

2 Enclosures

cc:

R. Mitzelfelt, Director, EID, Santa Fe, NM
A. Davis, US EPA, Dallas, Texas