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ENVIRONMENTAL IMPROVEMENT DIVISION

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Deputy Secretary

July 22, 1987



Harold E. Valencia
Area Manager
Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, New Mexico 87544

Dear Mr. Valencia,

Enclosed are a draft public notice and three fact sheets for interim status storage units at the Los Alamos National Laboratory. We intend to release the enclosures to the public on or about August 16, 1987.

Sincerely,

C. Kelley Crossman
Environmental Supervisor
Hazardous Waste Bureau

CKC/dm



2447

FACT SHEET

INTENT TO CLOSE STORAGE FACILITIES UNDER INTERIM STATUS UNDER THE NEW MEXICO HAZARDOUS WASTE ACT

Activity: Closure of Container Storage Area Under Interim Status

Facility Name: TA-40-2 Magazine

EPA I.D. Number: NM 0890010515

Location: Area TA-40, Los Alamos National Laboratory, Los Alamos,
New Mexico 87544

Landowner: United States Department of Energy

Facility Operator: University of California

Introduction

The Los Alamos National Laboratory (LANL) Interim Status under the New Mexico Hazardous Waste Act is unique because of the many projects that generate diverse types of hazardous wastes. These wastes must be disposed of by burial, incineration, recycling, or held in storage for later disposal.

On May 1, 1985, the Part B, RCRA permit application was received from LANL. LANL is electing to change some of the storage units to less than 90 day storage and terminate interim status rather than seek a final operating RCRA permit for those units. The Technical Area 40 Building 2 (TA-40-2) container storage unit is one of these. The status change for this unit is requested by the LANL and does not suggest any wrong doing on the part of the Laboratory.

The administrative record for this decision consists of a permit application (Part A), a "notice of intent to terminate interim status", a fact sheet, a closure plan and related correspondence. The administrative record may be reviewed at either the Mesa Public Library, 1742 Central, Los Alamos, New Mexico 87544, or the Environmental Improvement Division (EID) Central Office Library at the Harold Runnels Building, 1190 St. Francis Drive, Santa Fe, New Mexico.

The address for the EID representative for either reviewing or obtaining a copy of the administrative record, or any part thereof at 35 cents per page, or for commenting or public participation is:

Mr. C. Kelley Crossman, Environmental Supervisor
Hazardous Waste Bureau
New Mexico Environmental Improvement Division
P.O. Box 968
Santa Fe, New Mexico 87504-0968
(505) 827-2923

Comment Period

Any person, including the applicant, who wishes to comment on the tentative decision to terminate the unit's interim status and to approve the proposed closure plan may do so by submitting written comments, along with the commenter's name and address, to the above mentioned address. All written comments submitted on the proposed closure plan must be received by September 18, 1987 to be considered in formulating a final decision.

Procedures for Public Participation

Any person, including the applicant, who wishes to request a public hearing concerning the proposed actions, may do so by submitting a written request to the above-mentioned address. Any request for a hearing shall state the nature of the issues proposed to be raised in the hearing. All requests must include the requestor's name and address. Requests for a hearing must be received by September 18, 1987.

Reasons Supporting Decision To Change TA-40-2 To Short Term Storage

LANL is electing to change TA-40-2 to less than 90 day storage and terminate interim status rather than seek a final operating RCRA permit for this unit.

TA-40-2 will be closed under interim authority and then put back into service for high explosive (HE) storage and for short term (less than 90 days) HE waste storage. The operation of TA-42-2 for less than 90-day waste storage does not require a Part B permit (HWMR 204. B.1.).

The proposed closure plan consists of removing the existing wastes from and decontaminating the storage area. Testing will be conducted to verify adequate decontamination.

Interim Status Activities

Since November 19, 1980, LANL has been operating under Interim Status as a research and development facility. Area TA-40's primary activities consist in development of high explosive (HE) components. TA-40-2 is used for storage of HE and HE-contaminated wastes. The wastes and components are reactive (D003) and ignitable (D001). The wastes are stored in plastic bags which in turn are placed in cardboard boxes and sealed shut, or in 5 gallon plastic pails, before disposal. The maximum HE waste stored at TA-40-2 at any time is 180 kg. (400 lbs.). This limit is set by LANL administrative standard operating procedures and is based on safety considerations.

Formulation of Final Decision

All written comments submitted on the proposed closure plan will be considered in formulating a final decision. The Environmental Improvement Division will notify the LANL and each person who submitted comment during the public comment period of the final decisions or of any public hearing which may be scheduled.

If, after consideration of all written comments, these proposed actions become EID's final decision, EID will approve the proposed closure plan for storage unit TA-40-2 and require that the LANL's closure activities be performed in conformity with applicable State law, as well as within the terms of the closure plan.

PUBLIC NOTICE

**NEW MEXICO ENVIRONMENTAL IMPROVEMENT DIVISION
HAZARDOUS WASTE BUREAU
P.O. BOX 968
Santa Fe, New Mexico 87504**

PUBLIC NOTICE NO. 14

DATE: August 16, 1987

**NOTICE OF INTENT TO
CHANGE CONTAINER STORAGE AREAS
TA 40-2, TA 22-24 and TA 3-102 INTERIM STATUS
AND TO CLOSE LONG -TERM (GREATER THAN 90-DAY)
STORAGE AREAS FOR HAZARDOUS WASTE**

The State of New Mexico is authorized to operate a hazardous waste management program, in lieu of the Federal program, for those portions of the Resource Conservation and Recovery Act in effect prior to the enactment of the Hazardous and Solid Waste Amendments of 1984 (HSWA). The HSWA imposes additional requirements on hazardous waste management facilities which will be administered and enforced by the EPA until the State of New Mexico receives additional authorization for these requirements. The New Mexico Environmental Improvement Division (NMEID) of the State Health and Environment Department will determine whether to approve Los Alamos National Laboratory's (LANL), EPA I.D. Number NM 0890010515, request to close under interim status three long term storage units.

Under authority of the New Mexico Hazardous Waste Act (§74-4-1 et. seq. NMSA 1978, as amended 1987) and the New Mexico Hazardous Waste Management Regulations (HWMR-3), the NMEID proposes to change status of LANL's TA-40-2, TA-22-24 and TA 3-102 storage units, located at Technical Areas TA-40, TA -22 and TA -3, LANL, Los Alamos, NM, and to approve a closure plan for the short-term (less than 90-day) storage area at each site. LANL is involved in Research & Development work and has conducted long term storage of hazardous wastes associated with these programs after the units are closed they may be reopened for less than 90 days waste storage.

The address for the EID representative for either reviewing or obtaining a copy of the administrative record, or part thereof at 35 cents per page, or for commenting or public participation is:

Mr. C. Kelley Crossman, Environmental Supervisor
Hazardous Waste Section
New Mexico Environmental Improvement Division
P.O. Box 968
Santa Fe, New Mexico 87504-0968
(505) 827-2929

Any person, including the applicant, who wishes to comment on decision to change Interim Status & to Close long-term (greater than 90 days storage of hazardous waste for these areas) may do so by submitting comments, along with the commentor's name and address, to the address above. All written comments submitted on the decision to issue the permit must be received by September 18, 1987 to be considered in formulating a final decision.

Any person including the applicant, who wishes to request a public hearing concerning the proposed action(s), may do so by submitting a written request to the above mentioned address. Any request for a hearing shall state the nature of the issues proposed to be raised in the hearing. All requests must include the requestor's name and address. Requests for a hearing must be received by September 18, 1987 to be considered.