

MEMORANDUM



TO: Barbara Hoditschek, Program Manager
FROM: Robert S. (Stu) Dinwiddie
DATE: May 2, 1995
RE: LANL Notification of Treatability Studies dated April 14, 1995.

After reviewing the LANL Notice of Treatability Study I am making the following comments for your consideration.

Comments on Treatability Study #1: Hanford's Radioactive Sludge

1. In reference to LANL's test #1 using radioactive sludge from Hanford. LANL is prohibited from receiving waste from off-site. Module II Condition II.B.2. LANL must apply for and receive a Permit Modification, under the requirements of Module II Condition II.B.2. **prior to receiving waste from off-site.**
2. LANL states that conducting these experiments will cause them to "exceed the scope of the sample exclusion provision in 40 CFR § 261.4(d)." Yes they will exceed the scope of this regulation.
3. LANL states that the regulations limit shipments to 1,000 kilograms. This is correct, however LANL does not state how much they will be shipping/receiving. The program description indicates that less than two (2) liters of material will be need to run the tests. The tests are scheduled to last for five (5) years. Therefor the total amount of sludge received should not exceed ten (10) liters.
4. The storage area that LANL indicates will receive the material to be tested, CMR Building in TA-3, is listed in the LANL Mixed Waste Part A Application with sufficient quantity to hold this volume. This is a Mixed Waste Interim Status Unit.
5. LANL states that the limits of soil and debris used in treatability studies have recently been increased. Those limits have in fact been increased. The question is why even mention this unless something else is planned. Without the increased limits LANL can import 990 kilograms or 2,182.6 pounds more than will be used in the test?
6. LANL only has to notify NMED of the intended test 45 days prior to the receipt of waste. Notice is dated April 14, 1995. We have 25 days left as of this writing. (suspense date of 28 May)



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Comments on Test Plan #2: The Application of Polymer Filtration to Lead Removal from Soils.

1. This is described as a test to be conducted at LANL on LANL soils.
2. Only concern is the test will be at a TA-48. TA-48 is not a permitted TA, that is none of its operations are listed in the LANL Permit.
3. TA-48 is not listed in the LANL Mixed Waste Part A Application.
4. Concern is if TA-48 is not an identified TA in either the Hazardous Waste or Mixed Waste Part A Applications it will not be indicated on our LANL data base Spread sheet. Now LANL is conducting Hazardous Waste "treatment testing" in an area that we have no regulatory authority over.