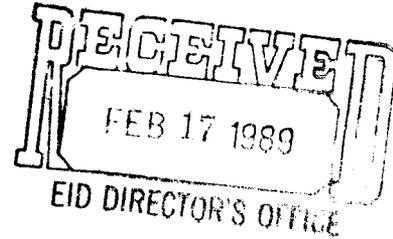




Department of Energy
Albuquerque Operations
Los Alamos Area Office
Los Alamos, New Mexico 87544
FEB 14 1989



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard Mitzelfelt
Director
N. M. Environmental Improvement Division
1190 St. Francis Drive
Santa Fe, NM 87503

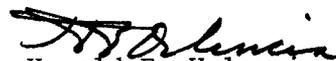
Dear Mr. Mitzelfelt:

This letter is to inform you of the initiation of treatment of hazardous waste at Los Alamos National Laboratory (the Laboratory). As you may be aware, the Laboratory has completed all the planned improvements on Batch Treatment System (BTS) at Technical Area (TA) 50 and can effectively treat waste to render it nonhazardous.

The BTS can treat both characteristic and listed hazardous waste under Resource Conservation and Recovery Act (RCRA) interim status. The nonhazardous effluent generated from the treatment process will be routed to the Industrial Wastewater Treatment System (IWTS) at the same location. Pursuant to the New Mexico Hazardous Waste Management Regulations (HWMR-4), Section 201.A.3.a.(d), if the IWTS receives "wastewater, the discharge of which is subject to regulation under either Section 402 or Section 307(b) of the Clean Water Act. . ." and the wastewater contains certain constituents in concentrations less than one part per million when the maximum total weekly usage is divided by the average weekly flow of wastewater into the headworks, the influent would not constitute a hazardous waste. The Laboratory will sample and analyze all effluent from the BTS prior to entrance into the IWTS to ensure concentrations of these constituents are well within the limits of the cited exclusion. If the analytical results indicate that the weekly limits would be exceeded, the effluent would be handled as a hazardous waste.

The Laboratory intends to begin treatment of hazardous waste within two weeks of the Environmental Improvement Division's (EID) receipt of this letter. If this interpretation does not agree with that of the EID, and further discussion is deemed necessary, please contact me immediately. Should you have any questions, please call Donna Lacombe of my staff at 667-5288.

Sincerely,


Harold E. Valencia
Area Manager

1DML-173

cc:
B. Hamilton, EID, Santa Fe, NM
A. Tiedman, ADS, Laboratory, MS-A120



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TR