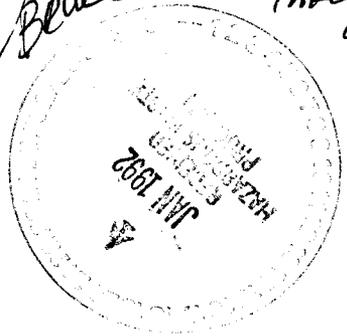




**Department of Energy**  
 Field Office, Albuquerque  
 Los Alamos Area Office  
 Los Alamos, New Mexico 87544

*to Bruce (this has been taken care of)*



**JAN 15 1992**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED P347 152976

Mr. Edward Horst  
 RCRA Program Manager  
 Hazardous and Radioactive Materials Bureau  
 New Mexico Environment Department  
 525 Camino de Los Marquez, Suite 4  
 Santa Fe, NM 87502

Dear Mr. Horst:

This letter is in regard to the meeting on November 21, 1991, concerning the three TA-53 Surface Impoundments (SIs) at the Los Alamos National Laboratory (LANL) and the possibility that they do not contain mixed wastes. These SIs were included in the Resource Conservation and Recovery Act (RCRA) hazardous waste permit application (January 25, 1991, Part A, and July 1991, Part B), which was submitted to your office. This submittal was based upon the belief that the SIs may contain mixed waste because of hazardous constituents detected in the liquids and sludges. Recent information, which is undergoing further analysis, leads us to believe that the hazardous constituents in the impoundments may not be hazardous waste.

A solid waste stream characterization of the entire LANL, comprising over 22,000 individual streams, has been recently completed. The data obtained during this characterization for the TA-53 SIs are currently being analyzed. Additional field work and personal interviews are being conducted to determine if the hazardous constituents are indeed hazardous waste. Also, a contractor has been tasked to sample and analyze the liquid and sludge for toxic contaminants using the Toxicity Characteristic Leaching Procedure (TCLP) in accordance with instructions from Mr. Marc Sides of your office.

Preliminary sampling and analyses (three water and three sludge samples from each SI) were conducted on the contents of the three SIs by LANL in July 1991. The hazardous constituents detected were; toluene in the northwest (NW) and south (S) SI sludges (0.014 - 0.068 mg/kg), benzidine in the NW SI sludge (1.9 - 3.9 mg/kg), 1, 2-benzenedicarboxylic acid, bis (2-ethylhexyl) ester in the NW SI sludge (1.1 - 1.2 mg/kg), and 1, 2-benzenedicarboxylic acid, dibutyl ester in the NW and S SI sludges (1.4 mg/kg). No TCLP metals were detected at or above the maximum regulatory concentration levels and no TCLP organic chemicals were detected. Also there were no hazardous constituents detected in the liquids. In addition, liquid samples were collected by LANL in July 1991 prior to a planned National Pollution Discharge Elimination System Discharge from the Northwest and Northeast SIs. Analyses were performed for volatile and semi-volatile organic chemicals. None were detected.

*TK*



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Mr. E. Horst

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Seven boreholes have been drilled around the SIs to determine if one or more of the SIs may be leaking and, if so, what is the extent of environmental contamination. While tritium above background has been detected, no organic hazardous constituent and no TCLP metal above expected background was detected. As a result of past activity in the area, this may or may not indicate leakage from the SIs. Further investigations will be conducted, including the possible installation of additional boreholes. See Section 5 of the July 1991 Part B for the Surface Impoundments at TA-53 for additional information.

In view of the above information we are asking for a 6-month extension for the submittal of the berm integrity testing and flood plain information that was committed to in the certification statement in Section 10.0 of the July 1991 Part B. The interviews and investigations for the waste stream characterization can be completed by the end of January 1992; however, the sampling and analysis will not be completed until the May/June time frame. The surfaces of the impoundments have already frozen and will probably not thaw until March of 1992 (International Technology inspected the SIs on December 5 and indicated they would not sample, for safety reasons, until the impoundments thawed - see enclosed letter). Sampling will begin at the earliest possible time and analyses will be completed within three months after the samples are taken. Your office will be kept informed of the status of this effort. If these units turn out to be nonhazardous waste units, there will not be requirement or need to permit them under RCRA and LANL will withdraw the permit application.

We believe that with the small number of hazardous constituents detected, the nature of the constituents, and the low concentrations observed, the likelihood of environmental degradation is very slight. The unnecessary permitting of these units will not be in the best interest of either the State or LANL.

Sincerely,

  
Karl J. Twombly, Chief  
Environment, Safety & Health Branch

5KT-002

Enclosure

cc w/enclosure:

Allen Tiedman, ADO, LANL, MS A120  
Tom Gunderson, EM-DO, LANL, MS K491  
Ken Hargis, (EM-8:91-880) EM-8, LANL, MS K490  
Jim White, EM-8, LANL, MS K490  
Sheila Brown, LC-GEN, LANL, MS A187