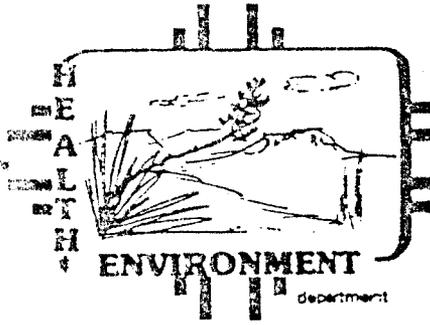


TA-54



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION
P.O. Box 968, Santa Fe, New Mexico 87504-0968
(505) 984-0020
STEVEN ASHER, Director

TONY ANAYA
GOVERNOR

Joseph Goldberg
SECRETARY

Ted Guambana
DEPUTY SECRETARY

JOSEPH F. JOHNSON
DEPUTY SECRETARY

August 8, 1984

Mr. William Crismon
DOE-LAAO
Los Alamos, NM 87544

Dear Mr. Crismon:

This letter is to document a phone conversation I had recently with Ms Karen Balo of HSE-7. We discussed the disposal of liquid waste at Area L of TA-54, and the current disposition and plans for treatment and/or disposal of the radioactive lithium hydride currently stored at the same location.

I indicated to Karen that the New Mexico Hazardous Waste Management Regulations (HWMR-2) do not allow the disposal of liquid wastes--hazardous or not, radioactive or not--at hazardous waste landfills, and so LANL's practice of discharging liquid non-hazardous waste in the surface impoundment(s) of Area L is not legal and must cease. This prohibition is found in Section 206.C.9.g. of HWMR-2.

When one thinks about it, the discharge of free liquid into a landfill flies in the face of the requirements to absorb free liquids prior to disposal, the requirements to prevent run-on which could facilitate leachate production, and other requirements. We at EID do not feel that the disposal of liquid waste at a hazardous waste landfill meets the general performance standard of Section 206.B.9.b. of HWMR-2.

This prohibition covers the uncontained treatment with water of the radioactive LiH which Karen said is still stored at Area L.

We are reviewing your response to our June 22, 1984 Notice of Violation. When our comments are completed, I will call you to pass on the gist of them so that you will be able to have the maximum time to prepare the revisions that will be required in our written response.

Please call if you have any questions or if we can help in any way.

Sincerely,

Greg Mello
Environmental Scientist
Hazardous Waste Section

GM:clm



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