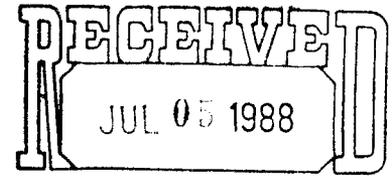


*Jack  
Boyd  
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**Department of Energy**  
Albuquerque Operations  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

JUL 5 1988



RECEIVED EID DIRECTOR'S OFFICE

Mr. Michael Burkhardt, Director  
Environmental Improvement Division  
P. O. Box 968  
Santa Fe, NM 87504-0968

JUL 05 1988

**HAZARDOUS WASTE SECTION**

Dear Mr. Burkhardt:

The Department of Energy (DOE) hereby requests your approval for an increase in the allowable volume of hazardous waste stored at the Los Alamos National Laboratory (LANL). Pursuant to the New Mexico Hazardous Waste Management Regulations (NMHWMR-4) Section 302.C.3.b. (40 CFR 270.72(b)), an increase in the design capacity for hazardous waste storage at a facility can be made provided the Resource Conservation and Recovery Act (RCRA) Part A application is amended. This requires that the facility submit, for the Director's approval, a revised Part A application and a justification for the needed change.

A revised Part A application increasing the liquid storage capacity at the Laboratory by 37,830 gallons per year at an equivalent of 1000 55-gallon drums will follow this request. The specific unit that requires this increased capacity is the waste chemical collection/storage area at Technical Area 54, Area L. DOE is requesting approval for this increase due to several related factors.

One of the most salient issues necessitating a capacity increase is the lack of available commercial disposal facilities in the Laboratory's vicinity. Currently, the Laboratory ships most hazardous waste offsite for disposal by incineration at EPA-approved commercial disposal facilities. These facilities must meet EPA's stringent and recently revised "Off-Site Policy" as well as have the capacity to handle the types and quantities of waste the Laboratory ships. Delays have occurred due to the lack of acceptable incineration capacity nation-wide.

In addition to the problems associated with off-site disposal, the regulatory waste manifest system, contractual agreements with commercial disposers and more stringent regulations associated with land disposal restrictions require more extensive and precise analyses of the wastes prior to shipment. Turn-around capabilities of both on and off-site laboratories have been an additional limiting factor in the Laboratory's ability to maintain the current allowable storage capacity at Area L.

Coincident with the increase in analytical and offsite treatment activities, the Laboratory has initiated aggressive programs to identify sources of hazardous wastes (by generator awareness/training programs, field inspections, amnesty programs, and the like), that have resulted in a substantial growth in the rate of waste requiring storage at Area L.

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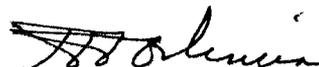
The net result of 1) increased input to Area L, 2) several week turnaround time for required analyses, and 3) scheduling transport for offsite disposal, has been an overload of the storage pad capacity at Area L in spite of a major commitment of manpower and money to the operation. Last year, Los Alamos processed the equivalent of about 2200 55-gallon drums through Area L; this year the total will exceed 3000.

We have reason to believe that the inflow of material to Area L will decrease somewhat once the full effects of awareness, training, recycling, and waste minimization programs are realized. However, it seems certain now that the final expected yearly flowrate of material requiring processing will continue to exceed the capacity of the existing storage pad at Area L. To address this situation, funding has been identified by the Laboratory for construction of two additional storage pads. These additional storage pads will be identical in construction to the existing pad.

Until the additional storage facilities can be completed, the Laboratory plans to continue the current practice of storing all waste containers that will not fit on the engineered pad within temporarily-bermed areas at Area L while they are being processed for disposal. The volume within these berms will meet regulatory requirements with respect to the volume of the protected material.

We will continue to work with your staff as our plans evolve for addressing the ramifications of progressing RCRA regulations. If you should have questions regarding this matter, please contact Donna M. Lacombe of my staff at 667-5288.

Sincerely,

  
Harold E. Valencia  
Area Manager

8850A

cc:

A. Tiedman, ADS, MS A120  
J. Puckett, HSE-DO, MS K491  
D. Garvey, HSE-DO, MS K491  
M. Martz Emerson (HSE8-88-376, 7-1-88), HSE-8, MS K490  
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