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

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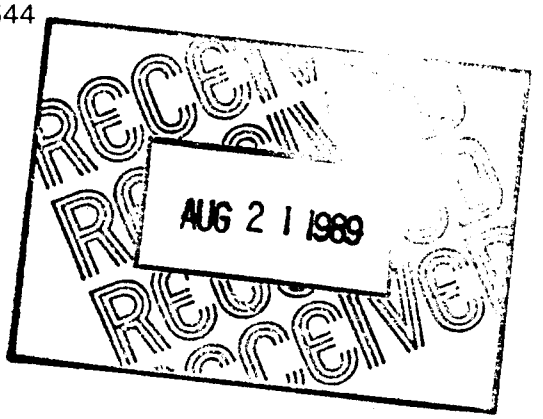

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. Kelly Crossman
Hazardous Waste Program
Environmental Improvement Division
1190 St. Francis Drive
Harold Runnels Building
Santa Fe, NM 87503

Dear Mr. Crossman:

It has recently come to the attention of the Department of Energy (DOE) that several modifications need to be made to the Los Alamos National Laboratory's (the Laboratory) hazardous waste Part A permit application. DOE hereby requests approval from the New Mexico Environmental Improvement Division (EID) for these changes under interim status based on the justifications provided in this transmittal. DOE apologizes for any inconvenience associated with the timing of this request but is committed to ensure the accuracy of all documents submitted.

The requested modifications and their associated justifications are as follows:

1. Technical Area (TA) 54, Area L Fenceline. A new layout of TA-54, Area L is being submitted with the Laboratory's comments on the final draft of the hazardous waste permit. One of the major changes in this drawing is the modification of the fenceline. The fenceline is being moved to separate the office trailers from the storage and treatment areas. This will provide stricter control over personnel access to the waste handling areas. Pursuant to a conversation between K. Balo, of the Laboratory's Health, Safety, and Environment Division and yourself, it was agreed that this change should be reflected in both the permit and the Part A application. A map is enclosed as a replacement page in the current Part A on file.

2. Changes to Page 3, Amounts and Treatment Codes. Reevaluation of the amounts and treatment codes on pages 3a through 3q of the Part A application have resulted in the need for modifications. Most of the treatment code changes have already been reflected in Attachment G of the draft hazardous waste permit. Those that have not will be requested in DOE's comments on the permit as well as in this transmittal. Explanations are provided for all amount changes. The modified pages are enclosed for insertion in the current Part A.

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D002, 300,000 to 320,000 pounds (lbs). The amount of corrosive waste currently being generated throughout the Laboratory has increased slightly from 300,000 to 320,000 lbs. This is due to increased production at the TA-46 stable isotope production program.

D003, 7,500 to 35,000 lbs. In the past, all high explosive (HE) waste burned at TA-16 was classified as K044 waste. It included scraps of HE that did not meet the description of sludges from the manufacturing of HE (K044), but rather met the description of reactive waste. Since 1988, this waste has been classified with the appropriate code. As a result, the annual generation rate of reactive waste has increased from 7,500 to 35,000 lbs. and K044 has decreased commensurately.

D044, T01. The addition of this treatment code is already reflected in Attachment G of the draft permit. The Laboratory would like the capability to treat all metal wastes.

D005, S02. The addition of this storage code is already reflected in Attachment G of the draft permit. It was added because of the long treatment and incidental storage time in tanks awaiting analytical results currently needed to treat barium contaminated sand.

D008, T01. The addition of this treatment code has already been made in Attachment G of the draft permit. Erroneously, the Laboratory believed that this waste code was listed on the Part A for treatment and treated some of this waste during the past year. That practice has been discontinued until approval to add this code to the Part A has been received from EID.

D009, 5,000 to 15,000 lbs. During 1988, a large amount of mercury in hazardous material inventories throughout the Laboratory was declared a waste and recycled. The Laboratory expects this to continue for several more years and would like to change the amount generated from 5,000 to 15,000 lbs.

D010, T01, 500 to 7,500 lbs. The addition of this treatment code and a change in generation amount has already been made in Attachment G of the draft permit. It is anticipated that an increase from 500 to 7,500 lbs. will be seen due to a new experiment begun this year. Again, the Laboratory believed that all codes for metal waste were listed for interim status treatment. Treatment had occurred but has been discontinued until approval to add this code to the Part A has been received from EID.

D011, 1,250 to 7,500 lbs. The volume of photo waste has been previously underestimated. It was mistakenly believed that because the silver was being recovered in-line, reporting of generation volumes was unnecessary. The increase from 1,250 to 7,500 lbs. reflects correction of this underestimation.

D012, 500 to 1,000 lbs. The Laboratory has determined that waste generated by the annual collection of unused pesticides for disposal is likely to be in excess of the currently allowable 500 lbs. and closer to 1,000 lbs.

F001, 180,000 to 10,000 lbs. In the past, much of the solvent contaminated waste was classified as F001. The Laboratory has made a concerted effort to better differentiate between F001, F002, F003, and F005 wastes. As a result, the inventories of F001 have decreased from 180,000 to 10,000 lbs. and those of F002, F003, and F005 have risen. The generation rate modifications that follow reflect this change.

F002, 5,000 to 75,000 lbs. Pursuant to the discussion provided under F001, this amount should change from 5,000 to 75,000 lbs.

F003, 5,000 to 150,000 lbs. Pursuant to the discussion provided under F001, this amount should change from 5,000 to 150,000 lbs. However, this waste stream has increased in volume due to more waste meeting the definition of F003. In particular, precipitation collected from the storage structures recently used to store organic waste at TA-54, Area L has been shipped offsite for incineration under this waste code. This volume will decrease when a roof is constructed over the sampling pad and the treatment tank area. (An alternative in HWMR-5, Section 261.3(c)(2)(i) may exempt this from the definition of hazardous waste as "precipitation run-off". However, DOE requests that EID confirm the applicability of this provision.) Also, all the water collected from the two surface impoundments at TA-35 was classified as F003. Due to the large volume of precipitation experienced last summer, 637,589 lbs. of this waste was generated. As this was a one time activity, the above annual rate change only reflects ongoing waste generation.

F005, 5,000 to 15,000 lbs. Pursuant to the discussion provided under F001, this amount should change from 5,000 to 15,000 lbs.

K044, 50,000 to 20,000 lbs. Pursuant to the discussion provided under D003, this amount should change from 50,000 to 20,000 lbs.

P043, T03. Reevaluation of this waste stream with regard to the permit conditions does not indicate a problem with incinerating this material. The Laboratory requests this addition to maximize future use of the incinerator.

P054, T03. This change would make the Part A consistent with Attachment G of the draft permit. (Interim status is not requested.)

P092, T03. Discussion provided under P043.

P113, T01. Discussion provided under P054.

P114, T01. Discussion provided under P054.

P115, T01. Discussion provided under P054.

U005, T03. Discussion provided under P043.

U006, T03. Discussion provided under P043.

U019, 500 to 1,000 lbs. The Laboratory is conducting an intensive program over the next several years to eliminate storage of chemicals no longer needed by the user groups. As a result, the annual generation of this commonly used chemical is expected to increase from 500 to 1,000 lbs.

U080, 500 to 1,000 lbs. Discussion provided under U019.

U092, T03. Discussion provided under P043.

U122, 500 to 1,000 lbs. Discussion provided under U019.

U123, T03. Discussion provided under P043.

U135, T01. Discussion provided under P054.

U138, T03. Discussion provided under P043.

U181, T93 to T03. This was a typographical error that has already been changed in Attachment G of the draft permit.

U188, 500 to 1,000 lbs. Discussion provided under U019.

U211, 500 to 1,000 lbs. Discussion provided under U019.

U234, T03. Discussion provided under P043.

The Laboratory anticipates the need for storage and treatment of the following compounds. It is requesting their inclusion in the Part A at this time with the following amounts and storage and treatment codes:

U248, 500 lbs.*, S01, T03;

U249, 500 lbs.*, S01;

U326, 500 lbs.*, S01, T03;

U353, 500 lbs.*, S01, T03;

U359, 500 lbs.*, S01, T03;

(* All entries with an asterisk are generated in small volumes only.)

DOE requests EID's approval for these changes due to the necessity to comply with State regulations. Please notify Mr. James Phoenix of my staff (667-5288) of your decision as soon as possible so the Laboratory's treatment of hazardous waste can resume.

Sincerely,

James R. Anderson
Acting Area Manager

1JP-367

Enclosures

cc:
J. Puckett, LANL, HSE-DO, MS K491