

TA-54



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MEMORANDUM

TO: LANL General Part B Permit Application File (Red GP '00)

FROM: Lee Winn, RCRA Permits Management Program *ZW*

RE: LANL Site Tour of Acceptable Knowledge, Waste Verification & Non-Conformance Tracking

DATE: March 30, 2000

Michael Chacón and I went to Los Alamos National Laboratories (LANL) to review acceptable knowledge, waste verification, and non-conformance tracking procedures which were discussed in the LANL General Part B Permit Application Waste Analysis Plan (WAP).

At the Solid Waste Organization (SWO) offices at TA 54 we selected five waste profile forms (WPFs) from a list of current WPFs from the CMRT building. These WPFs were pulled while we continued with our discussion waste verification. Once we reviewed the five we selected three to verify that adequate acceptable knowledge (AK) was kept on file by the generator at the CMRT building. One WPF was chosen because it had analytical data. One was chosen because it was using non-sampling acceptable knowledge (e.g. an MSDS), and the final one was chosen because it used the HAZCAT Chemical Identification System. Sean French of the SWO said that approximately 50 percent of all WPF categories used analytical data for AK.

From the SWO at TA 54 we went to the CMRT building to determine if the generator had characterized his waste properly using AK. We were satisfied with the AK paperwork at the site. For example, the WPF #30987, wherein the AK included analytical results, waste category prescribes a range of volatile concentrations. The analytical results verified that this waste fit within the prescribed range. However, if volatiles were detected at a higher concentration, for example, then a different WPF would have been used. The concentrations of constituents detected fit within the range given on the WPF in section 3. In one case where the AK was from an MSDS (for a battery), the



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facility choose to protectively claim that the lead solder used to attach a wire to the battery was in fact a hazardous waste, therefore no other supporting documentation was necessary.

There are three systems in place to detect discrepancies in the Waste Profile Form: 1) the verification process, 2) the non-conformance tracking process and 3) the disposal facility checks.

LANL's waste verification process operating procedure is attached (see DOP-FMU64-026, R.0). This process focuses on waste streams that are based solely on non-sampling AK. It is a semi-random selection based on such things as the history of generator, particular waste management coordinator (with a history of non-conformance), and process descriptions that are complicated. This process verifies 1% of all non-sampling acceptable knowledge waste streams.

Both Michael and I are becoming more comfortable with the WAP process and the waste category concept.

cc John K
Michael C.
Elizabeth.