TA-16

Jumeo

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

RECEIVED
JUN 2002
NMED Hazardous Waste Bureau

JUN 24 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James P. Bearzi, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Dear Mr. Bearzi:

Subject: Removal of the Los Alamos National Laboratory (LANL), Technical Area 16, Building 88 (TA-16-88) Container Storage Unit from Operational Unit List

The purpose of this letter is to request the removal of the LANL TA-16-88 mixed waste container storage unit (CSU) from the list of TA-16 operational units and from inclusion in the TA-16 portion of the LANL hazardous waste facility permit. The basis for this request is that the CSU has never been used for storage of a hazardous or mixed waste. The CSU has only stored one non-hazardous waste item as described below.

The CSU was established under interim status in the January 25, 1991 LANL Mixed Waste Part A permit application. Subsequently, the CSU was included in TA-16 Part B permit applications including the "*RCRA Part B Permit Application: Technical Area 16, Building 88, Container Storage Area; Flash Pad 387, Open Burn Unit; Burn Pads 388 and 399, Open Burn Units; Burn Tray 394, Open Burn Unit; Filter Vessels 401 and 406, Open Burn Units*," Revision 2.0, June 1995, and later revisions now under review for the LANL permit renewal.

TA-16-88 is a single-room metal building, approximately 100 feet by 20 feet that is used to store classified parts. The CSU occupies approximately 150 square feet of this room and is located in the northwest corner of the building. The CSU was established for secure storage of classified parts to provide direct placement of suspected hazardous wastes into storage without further transport to unsecure onsite hazardous waste management facilities. Long-term storage rather than generator storage in <90-day or satellite accumulation areas was deemed necessary because classified parts have limited disposal paths and considerable time is needed to arrange their disposal. The operational

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history for this CSU indicates that this apparent need was not necessary. The Engineering Sciences and Applications Division (ESA) is now in the process of phasing out the use of TA-16-88 for classified storage and wishes to eliminate the CSU.

The CSU was used for storage only once, involving one 10-gallon container of radioactive machining chips originally suspected to contain hazardous constituents. The container was moved into the CSU in April 1998 and sampled. The analytical results (Attachment A) showed trace amounts of RCRA-regulated metals were present. However, the metal concentrations were below the Toxic Characteristic Leaching Procedure (TCLP) limits. The waste was managed as low-level radioactive waste and not as a mixed waste.

This action is comparable to the request NMED recently approved to remove CSUs at TA-50. Two certification pages are included with this letter. The ESA groups responsible for operation of the CSU and the ESA Division Director have signed the first page. The second page includes the signature for the Acting Director, Department of Energy, and the signature of the Associate Director of Operations, representing the University of California. Both pages certify that the information provided herein is correct. This unit has been operated under interim status; hence, no change is required to the LANL permit.

If you have any questions regarding this request, please feel free to contact either Gene Turner of my staff at (505) 667-5794 or Jack Ellvinger of the Risk Reduction and Environmental Stewardship Division's Solid Waste Regulatory Compliance Group (RRES-SWRC) at (505) 667-0633.

Sincerely,

Joseph C. Vozella
Acting Associate Director
Office of Facility Operations

OFO:3GT-025

Enclosure

cc:
See page 3

cc w/enclosure:
Mr. Carl Will, Permitting
RCRA Permits Management Program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

Ms. Laurie King (6PD-N)
New Mexico/Federal Facilities Section
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

cc w/o enclosure:
E. Christie, OFO, OLASO
G. Turner, OFO, OLASO
J. Stetson, PWT, OLASO
E. Louderbough, LC-GL, LANL, MS-A187
A. Sherrard, ESA-FM, LANL, MS-C924
R. Grace, ESA-FM, LANL, MS-C924
S. Girrens, ESA-WR, LANL, MS-P946
J. Ellvinger, RRES-SWRC, LANL, MS-K490
G. Bacigalupa, RRES-SWRC, LANL, MS-K490

Attachment A

Removal of the Los Alamos National Laboratory (LANL), Technical Area 16, Building 88 (TA-16-88) Container Storage Unit from Operational Unit List

Hazardous Waste Analytical Determination
Sample ID #20059414

Attachment A

Analytical Results for Machining Chips
Stored in TA-16-88 CSU

Component	TCLP Result (mg/l)	Regulatory Limit (mg/l)
Arsenic	<0.002	5.0
Barium	<0.059	100.0
Cadmium	<0.007	1.0
Chromium	0.190	5.0
Lead	0.021	5.0
Mercury	<0.000074	0.2
Selenium	<0.002	1.0
Silver	<0.010	5.0

Attachment B

Removal of the Los Alamos National Laboratory (LANL), Technical Area 16, Building 88 (TA-16-88) Container Storage Unit from Operational Unit List

Certifications

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

for

James Holt
Associate Director for Operations
Los Alamos National Laboratory

6-18-02
Date Signed

E. Dennis Martinez
Acting Director
Office of Los Alamos Site Operations
U.S. Department of Energy
Owner/Operator

6-24-02
Date Signed

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Steve Girrens
Group Leader for ESA-WR
Los Alamos National Laboratory

6-7-02
Date Signed

Robert Grace
Group Leader for ESA-FM
Los Alamos National Laboratory

6-6-02
Date Signed

Earle Marie Hanson

Earle Marie Hanson
Division Director for ESA
Los Alamos National Laboratory

6-6-02
Date Signed