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MEMORANDUM:

TO: LANL File

FROM: Coby Muckelroy, ^{on} WRS 3

SUBJECT: Participation in Tiger Team audit at LANL

DATE: October 17, 1991

On October 2, 1991 I joined Cliff Summers, a member of the Tiger Team's waste management team, in one day of his audit at LANL. The intent of my participation was to observe the procedures for inspecting by the Tiger Team, and to see what they looked for and how they interpreted regulations. My visit was not intended as a formal inspection by the state, so I do not plan to initiate any enforcement action as a result of the visit. The day was spent conducting an inspection at TA 54 Area L. We were accompanied by Andy Montoya of LANL to visit all non-swmu waste management areas at Area L. At Area G, LANL conducts packaging of TRU waste, but Cliff had previously visited that site. At Area L, both hazardous and mixed waste were being handled. Two areas at Area L that are identified in the mixed waste Part A are the main container storage area and two lead stringer waste storage shafts.

Our tour of Area L began an 8:50 a.m. Cliff immediately noted that unauthorized access is possible, as the gate to the entrance of the storage areas was unguarded and open. We looked at storage pad 58 (the transport pad), where Cliff noted and less than two feet of aisle space was provided in one of the aisles between the containers. I noted that one drum was dated as "9/5" without the year written on the label; but Cliff did not note this. Next to pad 58 were several drums of barium sands, which contain barium nitrate which is treated with sulfuric acid to make barium sulfate. Next we visited a flammable storage shed (TA 54-31), where Cliff noted containers without flammable labels, and one marked D001 with a non-flammable gas label. Several have hazardous waste labels but no waste code marked, which Cliff commented was confusing in knowing what the wastes were. Andy said that much of this waste had been there since April 1991, when the DOE moratorium on shipping hw from areas with radioactive isotopes was mandated. Concerning this matter, Juan Corpion of LANL said earlier in the morning that the DOE moratorium was lifted yesterday, so that the storage capacity in



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the permitted storage areas most likely would not be exceeded before they can now be shipped offsite.

We then inspected the mixed waste storage area at Area L. Most of the drums are overpacked smaller drums since they contain mixed waste and are stored outside in an unsheltered, partially bermed area. The caustics bay held approx. 30 drums, the corrosives bay approx. 70 drums, the oxidizer bay approx. 16 drums, the ORM Poison bay approx. 200 drums (both non-haz. and haz. mixed waste), and the ignitable bay approx. 450 drums. The containers are stored on pavement with a berm on the north side but not on the south side, and Cliff noted this, especially since the dip is apparently southward. Any spillage would flow toward the south, then east directly into the adjacent canyon. Concerning this area, Cliff also noted that the nearest shower/eye wash station is at least 200 ft. away.

At the gas cylinder mixed waste storage area, Cliff noted that although two apparently identical cylinders were labeled as HF, one was coded D002 and the other U134. Also, several cylinders were not dated, while several exceeding one year storage. He also noted that the spill kit in this area, as with some of the other ones, were locked, preventing immediate access.

At the bulk chemical hazardous waste storage area, some solid wastes were being stored on pallets outside the bermed, covered area. This was necessary due to space problems because of the just lifted moratorium, according to Andy Montoya; but he said that the permit allows such storage of non-liquids. Two drums were not dated. One drum had beryllium contaminated solvent, but the waste did not contain beryllium dust, so a P-listed code was not necessary.

I asked Andy about the water on the tops of several drums that were being stored outside of the covered area. A couple of the drums are already somewhat corroded. He said that it rained two days ago, but knows of no standard procedure to remove the water. The only standard procedure related is to remove water which accumulates in those areas with secondary containment. He said that they have tried using the plastic covers, but that they blow off too easily. Cliff asked what the pH of the rainwater in the vicinity is, but no one knew. A worker in this area, Elmer Velasquez, stated that he did not want to immediately pour the water off in case it was contaminated.

Cliff commented that Area L in general had good housekeeping (although he never elaborated as to exactly what he meant in this context).

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At 1:40 p.m. we conducted a manifest review. With Manifest #90348, a shipment to Trade Waste Inc., the LDR notice was not dated (which is a concern, not actually a violation, since the manifest is dated). On Manifest #90352, an acid waste contained solder on lead, but no D008 code was on the LDR notice (no documentation was attached indicating the lead content). One manifest with F005 coded on it had no constituent identified on the LDR.

At 4:30 p.m., Cliff and other members of the Tiger Team waste management group conducted their daily outbrief with the group leader, Ms. Donna Bergman. This consisted of a roundtable discussion of the eighteen members on their findings of the day. One member (Rich ?) found hazardous waste cans in TA 53 rooms not designated as satellite accumulation points, but instead they are transferred when full to an outside SAP that is not at or near the point of generation, as he saw it. Also, at TA 53-2 he observed some radioactive waste that may be hazardous but not being managed as mixed waste. He felt that the waste characterization was not fully implemented or certified.

Another member, Tom Collins, commented that LANL had no system to ensure that idle SAP's and 90-day accumulation areas are taken off the current listing of waste management sites. He also noted that in one 90-day accumulation area an apparent "midnight disposer" left some chemicals without a disposal request form. Also, he added, some SAP's were not really near the point of generation. Also, in one area, unused reagents were stored with waste, but the reagents were to be used at a later date. Also, in one area one drum had several chemicals that he felt could possibly go under a waste minimization program if handled separately.

Finally, Cliff commented that the housekeeping at Area L was excellent, but pointed out the concerns and findings noted throughout this memo. He did state that he conducted the day's activities with me present, and pointed out that I was present only as an observer with the state.