

Post- Fax Note	7671	Date	9.23.94	Page	2
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To/MS: Paul Smith, ESA-11, MS C931,
 From/MS: Robert D. Hite, MS C931
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 Symbol: ESA-11-WM-94-4
 Date: Sept. 21, 1994

Engineering Sciences & Applications Division
 ESA-11 - Analysis and Testing

NMED INSPECTION OF ESA-11 SATELLITE WASTE STORAGE LOCATIONS

In the afternoon of September 20, 1994, Frank Sanchez, Department Hazardous and Radioactive Materials Bureau of the New Mexico Environment inspected ESA-11 satellite waste storage areas at Buildings TA-16-207, -54, -450, and TA-11-24. During the inspection, Mr. Sanchez was accompanied by R. Hite, ESA-11 Waste Management Coordinator, and Tony Grieggs and Deborah Wechsler, ESH-8. The results of the inspection are summarized below.

Mr. Sanchez expressed no concerns or asked no questions about any ESA-11 satellite with the exception of the one recently established in Bldg. TA-16-207.

During the inspection of the Bldg. 207 satellite, Thomas Shanley, building manager, was present in addition to the individuals named in the first paragraph above. The satellite in this building is currently used only to store orphan wastes left in the building at the time of its transfer to ESA-11. The wastes in question are:

- Three (3) "empty" drums, two of which may contain residues of acetone and one of which may contain residues of methylethylketone
- Two (2) cartons each containing approximately two gallons of unopened Kodak developer solution
- One three gallon metal dispensing can containing less than one gallon of 1,1,1-trichloroethane ("Chloroethene")
- Twenty (20) one pint or one-quart plastic or glass electroetching solutions or metal cleaner (pre-etching) solutions
- Two (2) one-pint plastic containers of marking ink ("new")

Mr. Sanchez posed questions regarding this satellite and the stored waste material which were directed at the following potential issues:

- The approximate date of discovery and postulated origin of the (orphan) wastes
- Characterization of specific stored wastes
- Time of preparation of waste profile forms and submission of requests for analysis
- Content and amounts of material in the three 55 gallon drums
- Date of establishment of the satellite storage area
- Compatibility of stored wastes and safety issues related to handling of the wastes

Mr. Sanchez major concerns appeared to be directed toward ESA-11 actions taken to effectively and safely manage and dispose of the wastes with emphasis on the time



frames for each step in the overall process. He requested and was provided the waste profile forms and attached MSDSs for his inspection.

Mr. Shanley related that ESA-11 had taken over occupancy of the building over one year ago. Mr. Hite informed Mr. Sanchez that initial efforts to characterize the electroetching solution included contacting the manufacturers of all of the solutions, that the manufacturers of the waste electroetching solutions in all cases provided MSDSs and pH values for each material. In one case, the manufacturer discontinued manufacture of the solution more than 12 years ago, but the pH and chemical content (without percentage concentrations) was known and provided. One of the providers, a technician who has worked for Electroetch, Inc. for over 12 years, furnished current MSDSs for the Electroetch solutions and verified that the chemical and physical makeup and properties of the solutions, as specified on each MSDS, was valid for the identified solution at the time of its manufacture. Mr. Hite emphasized that these efforts were taken to address immediate safety issues and to obtain hazardous material information needed to implement safe handling and waste management procedures.

Mr. Sanchez requested that several photographs be taken of the satellite area. Ms. Wechsler took several photos as requested which included shots of the entire area and of individual items within the area.

Other than questions related to when specific actions were accomplished, no specific issues were raised by Mr. Sanchez relating to packaging, labeling, or marking of the stored material or on the sealing or integrity of the packages containing the wastes.

Copies to:

Richard Browning, MS C931
North Carey, MS C931
Thomas Shanley, MS C931
Tony Grieggs, ESH-8, MS K498
ESA-11, ESH file

Discard Bob Hite 10/20/94

- 1 Sampled last week*
- 2 Paperwork done*
- 3 1 drum empty*