



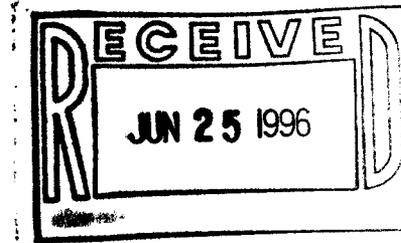
Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

*Jerry -
pls discuss
this w/ me
Benito*

JUN 25 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505



Dear Mr. Garcia:

Subject: Transmittal of Additional Information Regarding the RCRA/HWA Inspection

The purpose of this letter is to transmit information in response to two requests made by New Mexico Environment Department (NMED) inspectors at the RCRA compliance inspection out-briefing, June 13, 1996. The text of each of the requests, with corresponding responsive information/documentation, is enclosed with this letter as Attachments 1 and 2 respectively.

At the out-briefing, a number of apparent findings were identified by the inspectors. Those that required immediate attention and correction received such. During the inspection, it was indicated that NMED would consider any additional information which might mitigate or alter these apparent findings. We are in the process of assembling information on the findings and will be transmitting this information to you in the near future.

We believe that the enclosed information is responsive to the two requests that we received. We are available to discuss with you at any time this information, or the concerns you raised during the inspection. If you have any questions, please call me at (505) 665-5042, or Michelle Cash of the University of California at (505) 665-0223.

Sincerely,

H. J. "Jody" Plum
Office of Environment and Projects

LAAMEP:6JP-012

Enclosures

cc:
See page 2



16681

Benito Garcia

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JUN 25 1996

cc w/enclosures:

Jim Seubert

Hazardous and Radioactive Materials Bureau

New Mexico Environment Department

2044 Galisteo St., Bldg. A

P. O. Box 26110

Santa Fe, NM 87505

REQUEST FOR INFORMATION #1

**For further information regarding this material, please call:
Michelle Cash, ESH-19
665-0223**

REQUEST FOR INFORMATION #1

DESCRIPTION:

On June 13, 1996, the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB), closed out their annual Hazardous Waste Act (HWA) inspection by communicating concerns that were observed by NMED inspectors. NMED noted 7 apparent findings and made 2 requests for information. In attendance were representatives from NMED, Department of Energy (DOE), University of California (UC), and Los Alamos National Laboratory (LANL) subcontractors.

Request for Information #1 Description:

The NMED inspectors requested information describing the procedures which will be followed by LANL to segregate a waste contained in a <90 day storage area, in TA-50-1, room 34B, LANL site ID number 1333.

Los Alamos National Laboratory's Response:

The container in question, ID #C96065670, is a B-25 standard waste box (type SEG-45) provided to LANL by the Scientific Ecology Group, Inc. (SEG). It contains material associated with the decommissioning of outdated laboratory facilities at TA-21. This material consisted of miscellaneous solid wastes and construction/demolition materials, which included a laboratory hood and a vacuum pump contaminated with mercury. Because of the laboratory's location and former activities, this box of waste material was being managed as solid low-level radioactive waste in accordance with DOE and LANL policy (although radiation survey measurements of the waste indicated no detectable activity above background when the box was closed and transferred to TA-50).

Because of the presence of mercury-containing items, and the possibility of mercury (Hg) contamination being released to other materials in the waste box, the entire contents were being managed as mixed waste prior to shipment to TA-50 and while within the TA-50-1 <90 day storage area.

The container was shipped to TA-50 from TA-21 on June 6, 1996, under manifest. The purpose of the shipment was to separate hazardous waste from nonhazardous solid radioactive waste components in the box, thereby minimizing the generation of both mixed waste and low-level solid waste prior to disposal (the two projected output streams from the separation process). Such an operation must be performed by trained personnel in a controlled environment within the TA-50-1 decontamination facility.

Because this container could not physically fit into the available space in the interim status storage area nearest to the decontamination facility (site ID #348), a decision was made to stage the container within the <90 day storage area within the decontamination facility for waste separation. This is where the container was located at the time of the NMED inspection.

Description of Planned Activity

All work is going to be conducted within the <90 day storage area. This <90 day storage area at the TA-50 facility is the only LANL location which utilizes personnel trained to segregate mixed waste contaminated with Hg. The contents of the SEG container which may contain Hg residues include a Hg diffusion pump and a "California Hood". The TA-

50 team will inspect the contents, segregate Hg from other solid waste in the box, and repackage the contents (as low-level solid waste and Hg contaminated mixed waste) following separation.

The procedures and protective equipment required for this operation will vary based on the results of the monitoring of the container for any Hg gases when it is cracked open. If the monitoring results indicate the presence of Hg, the operators will be required to wear Hg/HEPA respirators while performing any work activity. Each worker will wear anticontamination (ANTI-C) clothing which includes gloves, coveralls, and booties.

The work procedures include the emptying of the SEG container and inspecting each piece for the presence of Hg. If Hg is identified on the equipment, it will be decontaminated using a commercially-available Hg spill kit. Once each piece of equipment is decontaminated, it will be placed in a new container and marked as non-hazardous, radioactive waste. The material generated in the clean-up process will be placed in a new waste container and labeled as mixed (hazardous) waste. Upon the completion of the project, all waste streams will be profiled, and appropriate paperwork will be generated to dispose of the waste output streams as radioactive mixed waste and low-level radioactive waste, respectively.

All necessary permits have been obtained from LANL's ESH-1 (Radiological Work Permit) and ESH-5 (Hg safety Permit) Groups, and thus the segregation operation may commence as soon as NMED indicates that it has no additional concerns with the proposed activity as described herein. It is suggested that unless NMED indicates otherwise, LANL would perform separation activities during the week of July 15, 1996.

REQUEST FOR INFORMATION #2

**For further information regarding this material, please call:
Michelle Cash, ESH-19
665-0223**

REQUEST FOR INFORMATION #2

DESCRIPTION:

On June 13, 1996, the New Mexico Environment Department (NMED), Hazardous and Radioactive Materials Bureau (HRMB), closed out their annual Resource Conservation and Recovery Act (RCRA) inspection by communicating concerns that were observed by NMED inspector. NMED noted 7 apparent findings and 2 requests for information. In attendance were representatives from NMED, Department of Energy (DOE), University of California (UC) and Los Alamos National Laboratory (LANL)

Request for Information #2 Description:

NMED indicated that Technical Area (TA) 3-2133 (site id #524), a <90 day storage area, was storing 8 cans of paint, seven of which appeared to be not properly labeled. More information was requested on the status and nature of the paint cans.

Los Alamos National Laboratory's Response:

These 8 cans of paint have been removed from the <90 day storage area because a use has been found for them and they no longer need to be disposed of. The 8 cans of paint that were being stored were all the same brand and had a MSDS printed on the product label of each can. The paint was placed in the <90 day storage area with the appropriate disposal form pending a decision on its possible disposal and/or use, while the Waste Management Coordinator gathered information on the paint (e.g., whether the age of the paint exceeded its shelf life, spec/MSD sheets, etc.). After the information was gathered and it was determined that the paint, a special epoxy paint, still had a useful life, a Lab user group, Space Engineering (NIS-4) came forward and identified a need for the paint in connection with a project that is to be done for the Hanford site. The paint has been removed from the <90 day storage area and put into NIS-4's paint inventory. The paint is not waste; it is a useful product with an identified need.