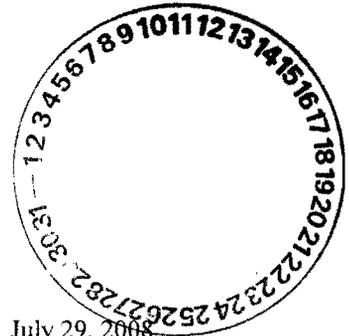


Permit

ENTERED



Environmental Protection Division
Water Quality & RCRA Group (ENV-RCRA)
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: July 29, 2008
Refer To: ENV-RCRA-08-158

Mr. Steve Pullen
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

SUBJECT: RESPONSE TO REQUEST FOR INFORMATION CONCERNING ITEM #366 OF THE LOS ALAMOS NATIONAL LABORATORY (LANL) HAZARDOUS WASTE DRAFT PERMIT COMMENTS, LANL, EPA ID NO. NM0890010515

This letter is to respond to your question about the LANL response No. 366 to Section G.1.2 of the draft hazardous waste facility permit as referenced above. The response asks for the ability to temporarily store large objects using plastic wrap prior to repackaging in storage containers. As we discussed on the telephone, this practice is acceptable for radioactive material storage of large surface contaminated objects in the same waste management units.

10 CFR 835 Subpart L "Radioactive Contamination Control" requires appropriate controls to manage radioactive contamination (10 CFR 835.1101, for control of material and equipment). LANL policy states that items with loose surface contamination should be wrapped, bagged, or otherwise controlled. For larger waste items such as contaminated glove boxes, plastic wrapping sealed with tape is an adequate procedure for isolating the waste and preventing the spread of contamination.

In some cases, the contamination associated with these items or the items themselves may contain hazardous constituents, making them subject to the provisions of the permit as mixed waste. However, the use of this waste management practice is intended only for the same types of waste as allowed above and would not involve liquids, solely hazardous waste, or items that could not be immediately placed into available containers.

This storage practice is intended to be temporary. Wrapped items are stored in this manner awaiting dismantling and placement into 55 gallon drums, standard waste boxes, or, if necessary, other oversize containers. This may not be possible immediately as such waste management activities may require the development of radiation protection procedures (radiological work permit) (e.g., respiratory protection, worker protection equipment, and radiation monitoring). This may involve the closure of the area to normal worker activities. It may also be necessary to accumulate multiple waste items before an efficient campaign can be put together to repackage the objects at one time.

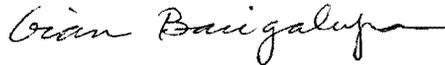


In some cases, the waste may need to be temporarily stored until a suitable oversized waste container can be obtained or manufactured.

Other LANL comments to the draft permit include the point that the waste storage containers used at the facility should not be limited to those that meet DOT performance standards for transportation. Although such containers are readily acceptable for storage purposes, the container storage requirements at 20.4.1.500 NMAC, incorporating 40 CFR 264, Subpart I can be met by other types of containers or devices. In this case, the use of wrapping is sufficient under the radioactive waste management program and meets the requirements of Subpart I subject to other permit provisions (e.g., unit containment, the Contingency Plan, and Inspection Plan) in the event the isolation provided by the wrap fails.

I hope that the information above addresses your request. If you have further questions, please do not hesitate to contact me at (505) 667-1579.

Sincerely,



Gian Bacigalupa
Water Quality & RCRA Group (ENV-RCRA)

GB/lm

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