



## Department of Energy

Albuquerque Operations Office  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

APR 9 1996



Mr. Coby Muckelroy, Enforcement Program Manager  
RCRA Inspections  
Hazardous and Radioactive Materials Bureau  
New Mexico Environment Department  
2044 Galisteo St., Bldg. A  
P. O. Box 26110  
Santa Fe, NM 87505

Dear Mr. Muckelroy:

The Department of Energy (DOE) and the University of California for the Los Alamos National Laboratory (LANL) are responding to your questions on our timely request for a 30-day extension for our <90-day storage area at Technical Area (TA) 21. The questions you asked were raised during a telephone conversation between you and Mr. Jody Plum on April 8, 1996. The questions raised are addressed below.

The exceedance of the 90-day storage time frame is necessitated due to the demolition work taking longer than originally planned. The original time estimated for the duration of the project, which was less than 90 days, was based on information available prior to initiating work. The delay has been caused by unforeseen difficulty in removing contamination from building ductwork. The extended duration of the decontamination process is beyond the control of the project, as the technology being employed is the best proven technology available. There are crews working on the project 10 hours a day, five days a week. Every effort is, and has been made to utilize the most efficient decontamination techniques in the most time effective manner.

A road closure is conducted because the mixed Transuranic (TRU) waste meets the specifications of a Type B waste under the Department of Transportation (DOT) classifications found at 40 CFR 173.435. The TRU waste is contained in Type A packaging. Type B waste quantities packaged in Type A packaging do not meet DOT requirements. By conducting a road closure, DOT requirements do not apply during transport of the waste. Unfortunately, Type B packaging is not currently available to LANL; therefore, road closures are currently necessary to transport this waste.

The filled TRU Pack containers must be transported from TA-21, which is located on LANL property, through off-site residential areas (i.e., Trinity Drive) of Los Alamos to the on-site TA-54 location. LANL believes such shipments should be combined and/or minimized in order to be most protective of human health and safety.



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Currently, there are 10 TRU Packs (DOT Type A packaging) stored at the <90-day storage area. These containers are standard waste boxes with an 82 cubic foot capacity. It is anticipated that another two TRU Packs will be filled during the 30-day extension request period.

Should you have any additional questions on the request for a 30-day extension, please do not hesitate to call Mr. Plum at (505) 665-5042.

Sincerely,



Theodore J. Taylor  
Program Manager  
Environmental Restoration Program

LAAMEP:7HJP-023

cc:

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