

TA 54

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| COMMUNICATION RECORD | | | | | Task No. 001-006 | |
| Phone In | Meeting <input checked="" type="checkbox"/> | Prospective Job | Past Job | Marketing | Route to: | Date: 9/25/07 |
| Phone Out | Other | Current Job | Admin. | | | Time: AM or PM 10:00am |
| File Name LANL Renewal Permit | | | | | Phone No. Gian: 667-1579 | Recorded By: Rebecca Kay |
| Person(s): Bob Lechel & Gian Bacigalupa Facility | | | | | | |

Subject: TA-54 Area G Site Visit

Remarks: Looked at Storage Shed 8, Building 33, Pad 5 (Shed 145 & 1041), and Domes 153 & 283.

Storage Shed 8 has sump but not piped to any other system. There was no hazardous waste being stored there at that time; radioactive only.

Noticed that building 33 had some RCRA waste drums stacked, on pallets, 3 high (with minimal securing around drums) near area where head-space gas vents retrofitted on drums.

Domes 153 & 283 are full of waste; drums in 153 and SWBs are stacked 3 high. Only drums in 283 and they are all stacked 3 high as well. Berm along asphalt pad (run-on control) has gashes and gaps in it-looks like skid loader hit has hit it. Problem speaks to closure.

Pad 5- when Gian and Bob were asked what constitutes the perimeter of that unit, the answer was the asphalt pad. However, the asphalt pad does not extend out to the west side of Dome 224 where sheds 144-146 and 147 are located (on dirt ground.)

I do not recall the application (or the current permit) indicating storage of waste outside on the pad behind dome 224 aside from what's in the sheds and SWBs. Need to verify this.

Hazardous waste label on SWB, bar code number 10033639, was lacking start accumulation date. When asked about this issue, Bob presumed that this waste box was generated around the same time as the other three or four with it (they all had accumulation start dates of 11/6/2006). Before I left, I asked that they send me all the information they had regarding this box to the office ASAP so I could verify the start date. However I was told that it may take some time to get it out because of all the security checks it must go through. I opted to see the information there and then in addition to LANL sending it to the office. I was shown the Waste Analysis Profile verifying the contents of the box; this answer was unknown when I asked this question originally. After further inquiring where the accumulation start date was on the paperwork I was presented, I was informed that it was not on the WAP. It was explained to me that this particular waste, contrary to Bob's assumption earlier, was a newly generated waste and not all the paperwork linking the WAP to the final documents were generated yet. It was explained to me that the paper trail was not yet completed for this drum because it's a newly generated waste. Louis, one of the TA-54 waste managers, further added that the label was probably faded by the sun obscuring the start date. Yet, it was just explained to me that this waste was newly generated so how could it possibly be outside long enough for the elements to fade it? So after going round and round trying to get to the root of my question, ultimately, where is the start date for this waste, it was revealed that the date is in fact on the hand written log book that was not available for me to see at that time. I requested all information regarding this SWB be sent to the HWB ASAP for review.

Action Required: Check current permit to see if storage outside on Pad behind Dome 224 is identified.

Action Taken:

Expecting information from Bob Lechel and Gian Bacigalupa regarding waste accumulation start date on SWB # 10033639

