

Los Alamos

NATIONAL LABORATORY

Hazardous & Solid Waste Group (ESH-19)

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ESH-19-98-030

February 24, 1998

Mr. John Keiling
Hazardous & Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo Street
Santa Fe, New Mexico 87505-2100

Dear Mr. Keiling:

**SUBJECT: DISCUSSION OF ACTIVITIES AT THE RAMROD FACILITY AT
TA-50-37**

The purpose of this letter is to follow up on a phone conversation we had Friday, January 30, 1998. In that conversation we discussed options involving the operation of the RAMROD facility that is located at TA-50-37.

The RAMROD operation is not a RCRA regulated treatment, storage or disposal unit in itself. The Los Alamos National Laboratory has submitted a permit modification to add additional storage to support the RAMROD operation. That application was submitted in December of 1996. On April 1, 1998 transuranic waste characterization operations in RAMROD are scheduled to begin. These operations involve the use of gloveboxes to perform visual examination, drum coring, head space gas sampling, and segregation of waste items in legacy waste drums.

The issue that has been raised and that is within the permit modification package pertains to the waste that may remain in the gloveboxes at the end of a given work shift. We had a discussion at our last monthly meeting concerning the operations at TA-16. In that discussion we understood the waste accumulated on the pad for burning is not being stored but is rather waste in the process of being treated. As we discussed last week we would like to take a similar approach to the waste in the RAMROD gloveboxes at the end of a work shift. We would like to leave the waste in the glovebox until the next day when work again would commence on the sorting and further characterization of the waste drums.

There are existing interim status and permitted storage present elsewhere in TA-50-37. These storage locations would be utilized for the waste before and after the staging of the items in the characterization gloveboxes. On Fridays and prior to holidays all work would cease in the gloveboxes by approximately mid day so the gloveboxes could be cleaned out. The procedure

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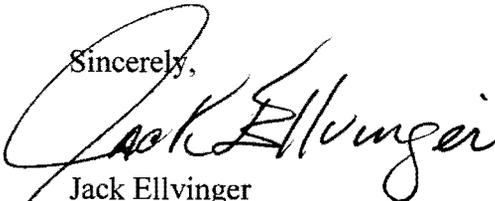
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would require that no items be left in the gloveboxes for longer than 24 hours. The gloveboxes would be emptied prior to any weekend or holiday.

We request that you review this procedure (more detail of glovebox operations is within the permit modification) and let us know if this is a proper approach to this operation. If this is acceptable, we would withdraw the modification in favor of submitting a renewal package for a permit module for TA-50 operations in total. It is hoped we can make that submittal prior to the end of this fiscal year.

If you should have any questions concerning this request please feel free to contact me at (505) 667-0633.

Sincerely,



Jack Ellvinger
Hazardous & Solid Waste

JEE:em

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