

MEMORANDUM

TO: File

THROUGH: Ed Horst, RCRA Program Manager
Bruce Swanton, RCRA Technical Program Supervisor
Herb Grover, RCRA Permits

FROM: Danny Katzman, RCRA Technical Group

RE: Summary of notes from meeting with LANL on the TRU-waste drums
storage at TA-54, Area G

DATE: April 27, 1992

This memo summarizes the April, 27, 1992 meeting between LANL and NMED on the issue of the TRU-waste drums at TA-54, Area G.

Approximately 19,000 drums are currently contained with pads 1,2, and 4 at TA-54, Area G. The waste has been stored since the late 1970's.

The waste is considered "TRU legacy waste" and is "uncertified".

The wastes are contact handled and are buried under earthen covers to protect from the effects of diurnal cycles. The drums are placed 4 high, covered in plastic, and lastly, covered with dirt.

The wastes have been stored since the late 1970s.

Drum exhumation began 1.5 years ago as part of a process to recertify some of the pad drums which had lost certification under WIPP WAC due to their liquid content. At that time, some corrosion was detected on the outside of some of the drums. The corrosion on the drums is limited to drums located around the edges of the pads. LANL suspects that the corrosion is potentially due to the effects of variations in diurnal air temperatures and moisture. The corroding drums have been buried approximately 6 years.

Pads 1,2, and 4 overlie 3 older waste disposal pits that received unknown quantities and types of wastes since the late 50's. The pits were backfilled and covered with approximately 5 feet of soil.

A vapor plume consisting of at least TCE and TCA is believed to be emanating from the old disposal pits beneath pads 1,2 and 4. The plume extends at least 150 feet deep.

8% of the 19,000 drums are solidified waste.

The pads are presumably collecting VOCs derived from the underlying pits. These VOCs may be contributing to the corrosion of the drums in conjunction with atmospheric-derived moisture. This problem may



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be enhanced if an impermeable (non-breathing) cover is placed over the drums.

LANL would like to see plastic covers placed on the drums soon, before the monsoon season.

Herb Grover requested all pertinent technical documents that refer to studies done on drum corrosion, or LANL's waste retrieval program.

Bruce Swanton requested the names of any appropriate DOE facility and state and EPA regulatory contacts that may have worked on regulatory approaches that the NMED may be able to adopt wholly or in part.

Herb suggested that a compliance schedule be issued.

A site visit and meeting was tentatively scheduled in order to observe and discuss the drum storage areas. DOE Albuquerque was requested to attend the site visit and meeting in order to expedite the schedule. At the meeting the NMED would like to see firm information on LANL's limitations on the exhumation schedule or any other internal roadblocks. The NMED may accept possible other options than exhumation only as an interim response.