

TASY

ENTERED

Pullen, Steve, NMENV

From: Gian Bacigalupa [gian@lanl.gov]
Sent: Thursday, July 24, 2008 11:46 AM
To: Pullen, Steve, NMENV
Cc: jee@lanl.gov
Subject: RE: Re: Retrievable TRU Information

Steve,

The text you have copied is taken from corrective action program documents in which the purpose was to provide as complete a description of the units as possible rather than from documents that would make distinctions about the regulatory nature of the material. The waste language is descriptive in that it was submitted after the effective date of authorization for mixed waste (July 25, 1990, see 55 FR 28397, July 11, 1990 and letter: Mr. G. Thomas Todd, Area Manager DOE from Robert S. Dinwiddie, RCRA Permits Management Program, HWB, NMED, June 26, 1997). The language is therefore relevant although maybe confusing in terms of when the waste would have become subject to the hazardous waste management regulations. However, placement of the waste occurred prior to the authorization date and the trenches and Pit 9 were also inactive prior to that date. As such, the units are not regulated as mixed waste management units and the previously disposed wastes are not subject to regulation unless actively managed (see 55 FR 8762-3, March 8, 1990). If active management of the wastes occurs in the future, it will be managed and characterized as newly generated waste.

The document available at HWB that I had previously suggested provides information about potential management of the waste and that supports the description of the waste constituents (see Review of Transuranic Waste Retrieval Plans for Area G at Material Disposal Area G, Technical Area 54, Los Alamos National Laboratory, April 2006, LA-UR-06-0280, Tables 3.1-1 and 3.2-2). In addition, the executive summary included in the document describes the derivation of the Atomic Energy Commission term "retrievable storage" which does not necessarily have the same meaning as the RCRA term "storage."

Please let me know if you have further questions.

Thank you,
 Gian Bacigalupa
 ENV-RCRA
 667-1579

At 04:16 PM 7/23/2008, you wrote:

Gian,

Please explain the following two references to mixed wastes being located in the subject trenches.

1. The current LANL TA-54 Part B permit application, Attachment I, Sub attachment C, states the following in the unit description:

"Former SWMU 54-014(d), which consists of disposal trenches A, B, C, and D, is located in the south-central portion MDA G and is included in Module VIII. These trenches began receiving TRU and mixed LLW in 1974."

30548



7/24/2008

2. The OU-1148 data report (1992) states, as to TA-54 MDA G Pit 9:

“Pit No. 9 is a storage pit for retrievable TRU/mixed waste.”

Thanks,

Steve Pullen

This inbound email has been scanned by the MessageLabs Email Security System.
