



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
DOE OVERSIGHT BUREAU
P.O. Box 1663, MS/J-993
Los Alamos, New Mexico 87545

MARK E. WEIDLER
SECRETARY

28 August 1997



Mr. Mat Johansen, AIP POC
U.S. Department of Energy
Los Alamos Area Office
528 35th Street, MS A316
Los Alamos, NM 87544

RE: Department of Energy Oversight Bureau (DOE OB) Inspection Observations and Recommendations concerning DOE's Request for Cancellation and Withdrawal of the Mixed Waste Container Storage Area at TA-55 Plutonium Facility 41 (TA-55-41), Los Alamos National Laboratory (LANL).

Dear Mr. Johansen:

On March 12, 1997, the DOE submitted a request to the Hazardous and Radioactive Materials Bureau for the cancellation and withdrawal of the following Mixed Waste Container Storage Area at TA-55 Plutonium Facility 41 (see attachment). On August 21, 1997, LANL ESH-19 staff accompanied me on a non-regulatory inspection of this site. The following attachment lists the DOE OB observations and recommendations. This inspection was requested by the DOE and LANL ESH-19 and a copy of this correspondence will be transmitted to them in addition to the NMED, Hazardous and Radioactive Materials Bureau in Santa Fe. Any specific technical concerns regarding this site can be forwarded to Jack Ellvinger (LANL, ESH-19) at 667-0633, or myself at 672-0448.

If you have any questions please do not hesitate to call me.

Sincerely,

Steve Yanicak, LANL POC
Department of Energy Oversight Bureau

SY:sy

Attachments



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Mr. Mat Johansen
28 August 1997
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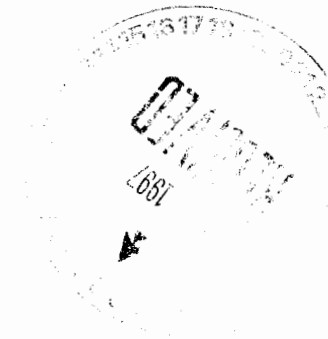
cc w/attachments:

Ed Kelley, NMED, Director, WWMD
John Parker, NMED, Chief, DOE OB

[REDACTED]

Stu Dinwiddie, NMED, Program Manager, HRMB
Jack Ellvinger, LANL, ESH-19, MS K490
Hilary Noskin, LANL, ESH-19, MS K490
Ted Taylor, DOE LAAO, MS A316
Jody Plum, DOE LAAO, MS A316
Dave McInroy, LANL, EM/ER, MS M992

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DOE OB Inspection Observations and Recommendations

SITE: Mixed Waste Container Storage Area at TA-55-41

LOCATION: TA-55 Plutonium Facility Vault Building (TA-55-41)

DATE OF INSPECTION: 8-21-97 (1:15 pm - 2:15 pm)

OBSERVATIONS: Structure TA-55-41 is often referred to as "the vault". The area of concern is situated in the basement of the building which consists of a large very thick-walled concrete room, similar in size to a small warehouse (approximately 65' width X 150' length X 20' high), and additional smaller thick-walled office-sized rooms (approximately 20' width X 20' length X 12' high). All these rooms contain various sized metal and/or concrete-like storage containers, similar in appearance to filing cabinets. The storage containers in the large room (vault) can be accessed by robotic handlers that are situated on tracks along the center of the isles in the room. All the metal storage containers are brand new, empty and appear to have never been used. Although the vault had been originally designed to safely store radioactive material, the building was never used for this purpose and is currently awaiting a new mission. The smaller rooms are presently used to store cardboard boxes full of old paper files and some electronic equipment (possibly old PC computer parts). The interior of the vault and immediate area showed no signs of staining or other indicators of hazardous and/or mixed waste storage. There was no evidence observed or discussed that any solid, or mixed waste was ever stored in these rooms.

RECOMMENDATION: The DOE OB recommends that this site be taken off the RCRA Part A Permit.

JTC



Department of Energy
Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

MAR 12 1997



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, New Mexico 87505

Dear Mr. Garcia:

Subject: Request for Cancellation and Withdrawal of the Los Alamos National Laboratory (LANL) Mixed Waste Container Storage Area at Technical Area 55 Plutonium Facility 41 (TA-55-41)

The purpose of this letter is to submit our request for cancellation and withdrawal of the LANL Mixed Waste Container Storage Area at TA-55-41. The unit was added to the 1993 Resource Conservation and Recovery Act Part A revision as a mixed waste container storage area with a 100,000 gallon storage capacity. This area was not on the original Part A Permit for mixed waste and was removed from the 1995 TA-55 Part A revision. No mixed or hazardous waste was stored in this area and there will be no mixed or hazardous waste stored in this area in the future. We request that the inclusion of the container storage area at TA-55-41 be withdrawn and canceled.

If you have any questions, please contact Jody Plum of my staff at (505) 665-5042.

Sincerely,

G. Thomas Todd
G. Thomas Todd
Area Manager

LAAMEP:2JP-062

Enclosure

MAR 12 1997

Benito Garcia

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bcc w/enclosure:

H. Haynes, Office of Counsel, LAAO

M. Johansen, Acting AAMEP, LAAO

J. Plum, LAAMEP, LAAO

S. Brown, LC-GL, LANL, MS-A187

J. Rochelle, LC-GL, LANL, MS-A187

D. Erickson, ESH-DO, LANL, MS-K491

J. White, ESH-19, LANL, MS-K490

J. Ellvinger, ESH-19, LANL, MS-K490

H. Noskin, ESH-19, LANL, MS-K490

MAR 12 1997

Request for Cancellation and Withdrawal of the Los Alamos National Laboratory Mixed Waste Container Storage Area at Technical Area 55 Plutonium Facility 41 (TA-55-41)

This document describes the request for cancellation and withdrawal of the LANL Mixed Waste Container Storage Area at TA-55-41. The unit was added to the 1993 Resource Conservation and Recovery Act (RCRA) Part A revision as a mixed waste container storage area with a 100,000 gallon storage capacity. LANL is a multidisciplinary laboratory (EPA No. NM0890010515) owned by the Department of Energy (DOE) and operated jointly by DOE and the University of California. LANL is located approximately 60 miles north-northeast of Albuquerque, New Mexico, and is divided into 51 TAs.

The action is in accordance with RCRA as codified by the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20 NMAC 4.1) Subpart VI § 600.

Background

The container storage area was not a part of the original RCRA Part A Permit for mixed waste, was added to the 1993 Part A revision with a 100,000 gallon capacity, and was then removed from the subsequent 1995 Part A revision. The removal of TA-55-41 from the 1995 revision proceeded because of the decision to use the area in a different capacity not associated with waste storage.

Rationale

The TA-55-41 container storage area has never been used to store wastes and no wastes will be stored in the area in the future.

Because there has been no waste stored in the area and there will be no waste stored in the unit in the future, the closure requirements set forth in RCRA as codified by 20 NMAC 4.1 Subpart VI § 600 at 40 CFR 265.110, 265.111, 265.112, 265.113, 265.114, 265.115, 265.116, 265.117, 265.118, 265.119, 265.120, 265.140-265.150, or any other requirements associated with hazardous waste treatment units, are not applicable.