

Subject: Permitted Treated 'Cement' Drums w/Pu

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From: Steve Holmes <steve_holmes@nmenv.state.nm.us>

To: pzt@lanl.gov *Pamela Rogers, LANL*

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My name is Steve Holmes and I am assigned by the State of New Mexico Environmental Department (NMED), Hazardous Waste Bureau (HWB) as an Environmental Specialist for the Waste Isolation Pilot Plant (WIPP) Permitting aspects of operations. Derrick Stafford (LANL/Hazardous Waste Facility) informed me to contact you. Jody Plum, Department of Energy, Carlsbad Field Office (DOE/CBFO), has asked if some LANL TRU waste can be approved to WIPP "as is" due to the fact that they are treated under an existing permit from NMED. These drums are generated at TA-55 where Pu extract from a process leaves non recoverable Pu in a hazardous condition (nitrated and nitric acid solution). As a result of treatment, the waste is solidified and 'churned' with cement. During this process, the churning device is left in the drum, as it cannot be retrieved. I have researched the process and permit; however I cannot obtain any other information pertaining to sampling, hazardous constituents, and eligible for the WIPP Waste Acceptance Criteria (WAC). Could you please answer the following questions so I can assist in the disposal of the waste?

1. Have any core samples been conducted ?
2. If samples have been taken, has any process modification occurred to justify further sampling? (i.e., change in SOP/replacement chemicals or catalysts/improved recovery efforts)
3. Are there any RCRA concerns post treatment? (If there are RCRA constituents, please list them)
4. How many drums are in the waste stream?
5. Will this waste stream continue?

Thank you

Steve Holmes

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