



Subject: Disposal of RFETS fluorescent light fixtures with ballasts at WIPP

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From: Steve Zappe <Steve_Zappe@nmenv.state.nm.us>

Organization: NMED Hazardous Waste Bureau

To: Steve Gunderson <steve.gunderson@state.co.us>

Hi Steve -

NMED is looking into the possibility that WIPP may have disposed of PCB waste in violation of their permit by accepting and disposing of at least one RFETS waste drum containing a couple of fluorescent light fixtures. I'm sending you this preliminary e-mail to see if CDPHE has any information regarding some of the statements provided to us by DOE Carlsbad concerning this matter.

According to the waste stream profile (RF002.01), the waste is a light metal waste stream packaged in Buildings 371, 374, 559, 561, 707, 771, 774, 776/777, 779, 886, and 991. The drum in question came from Room 114, Building 771, packaged November 29, 1989, and the fixture may have come from a glovebox in Room 146. NMED has observed radiography and visual examination video tapes for this single drum clearly depicting a fluorescent light fixture complete with ballast. We have been unable to identify whether the ballast has a label indicating whether it contained PCBs or not.

The RFETS former manager of operations at the time of waste packaging stated that light fixtures "were routinely replaced at a frequency of between 1 to 2 years." From this statement, DOE concludes the ballast in question would be newer than 1979, and therefore would not contain PCBs. The former manager also stated that "in the late 1980s or early 1990s there was a sitewide campaign to identify, label, and remediate PCB-containing items." However, as mentioned earlier, no label is visible in the video tape indicating the presence or absence of PCBs.

Can you comment on either of these statements by the RFETS former manager?

Does the state exercise any oversight in the inventory, management, storage, and disposal of PCB-bearing wastes at RFETS? If so, what additional information could you share with us regarding the likelihood that

TRU light metal waste containers might include PCB-bearing ballasts? Note that we're not asking for a definitive determination, but we're convinced that RFETS has, in its history, needed to dispose of pre-1979 fixtures with ballasts containing PCBs. We'd like to know how they managed such waste, and what changes (if any) they instituted once PCB disposal regulations were promulgated.

We're also asking DOE Carlsbad to identify similarities and differences between this waste stream and another RFETS light metal waste stream

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currently stored at INEEL. INEEL had chosen to assume that all ballasts contain PCBs, and therefore they segregate containers with ballasts from other containers destined for WIPP.

Give me a call if you'd like to talk about this, otherwise an e-mail response will suffice. I would appreciate it if you could identify for me the appropriate regulatory contact within CDPHE (or EPA) for PCB questions at RFETS. Thanks for your assistance in this matter.

Steve Zappe
NMED WIPP Project Leader
(505) 827-1557