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NMED  
Hazardous Waste Bureau

Rocket science?

WIPP has been closed since February, and likely to remain closed for 18 m. to 3 years? People will lose jobs, LANL container is breached: that drum had highly radioactive nitrate salts with 100% Biodegradable Organic Kitty Litter plus neutralizers. Chemistry 101 – Bad Decision. LANL identifies as D001, D002 and D003, but no codes. No document requests or action taken by a very weak regulator – ES provides wrong information, threatens operators + doctored documents for the AIB. Concern is safety and covering up facts for 3706.

1. WCRF procedure like a 1<sup>st</sup> grader – no requirement to neutralize till Mar. 2013; no req to document pH, record, train, and used wrong test method.
2. Talk to operators like everyone else
3. Kitty litter is not non-biodegradable per EPA + DOE Order 435.1N. Everyone knows. Consequences in biodegradable are concrete - result in degrading the waste, dewater and result in liquids + with D003 – fuel to the fire!
4. ADEP knows the waste streams were D002, and D003 with organic = non-compatible.
5. Gets docs! ES Smith to Cox, emails – crazy not to request simple docs
6. ADEP reg compliance is about protecting JM and Cox – can't be trusted

What is going on?????? This is easy

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**Date:** May 20, 2014  
**To:** Dan Cox  
**From:** Miles Smith *ms*  
**Subject:** Revision 1 of Nitrate Salt Processing Timeline

Please find attached Revision 1 of the Nitrate Salt Processing Timeline. We had previously provided Dave Frederici of you staff an earlier version of this document. Subsequently, we made the addition of "Tidy Cat" to the list of kitty litters used in the August 1, 2012 entry. Additionally, in this entry we clarified the name of the "Naturally Fresh" kitty litter to "Blue Buffalo Naturally Fresh" in the same entry. Finally, in the January 2013 entry we added the use of Tidy Cat during this time period.

## Nitrate Salt Processing Timeline

**Fall 2011 (~November)** - Began processing nitrate salts utilizing procedure EP-WCRR-WO-DOP-0233 (No specific steps relating to nitrate salts existed. Utilized Waste Lock 770 as the absorbent for liquids.

**March 8, 2012** - Steve Clemmons sent email to Kathy Johns-Hughes notifying her that all processing and characterization of salt waste was put on hold until CBFO request for treatment is resolved.

**Late April 2012** – A couple meetings were held with LANL personnel, ES, and WIPP Difficult Waste SME to discuss the processing of nitrate salts to include:

- \* a method to reduce the number of POCs generated as daughter containers – When obtaining rad surveys of waste items being removed from the parent drum, the parent drum lid will be placed over the waste item to simulate the waste items being inside of a drum. This technique would provide a representation of the expected dose rate outside of a drum in order to determine whether the dose rate may exceed 200 mrem/hr at contact.

- \* an explanation from the WIPP Difficult Waste SME (Dave French) that LANL would not be able to ship the previously remediated nitrate salts to WIPP because they would have to carry the D001 & D003 codes. He briefly discussed the handling of nitrate salts at Idaho and briefed that future processing (remediation) of nitrate salts at LANL would require the mixing of salts with an organic absorbent at a minimum ration of 1.2 to 1 (absorbent to salts). I questioned what type of organic absorbent and was told any plain kitty litter that you could get at the grocery store or diatomaceous earth. He indicated we should use a kitty litter free of “perfumes”. I also expressed concern with the manner in which an operator could measure 1.2 volume of absorbent to waste and told 1.2 was a minimum value. I stated my intention was to implement a 2:1 ratio to ensure the minimum value was achieved.

- \*Nitrate salts drums previously remediated (and absorbed with Waste Lock 770) would have to be re-processed to add the kitty litter at the specified ratio.

**May 10, 2012**- Submitted a procedure change to EP-WCRR-WO-DOP-0233 to Ron Smart to implement the agreed upon path forward.

**May 24, 2012**- Rev. 34 of procedure EP-WCRR-WO-DOP-0233 issued but did not include change relating to addition of absorbents to nitrate salts (processing of nitrate salts still on hold). Change related to surveys techniques was deemed critical to reduce the number of POCs generated.

**August 1, 2012** - Rev. 36 of procedure EP-WCRR-WO-DOP-0233 issued implementing Section 10.6 “Processing Nitrate Salt Drums”. { My review comments included reducing the ratio from 2:1 to 1.5:1 due to the amount of absorbent that would be required to be bagged into the glovebox and the fact that Operations field personnel felt they could manage the 1.5:1 ratio from a measuring standpoint. “(Kitty Litter/Zeolite absorbent)” following “organic absorbent” was added during the procedure review process (not sure by whom.) Used Swheat Scoop, Exquisicat, Blue Buffalo Naturally Fresh, Feline Pine, Tidy Cat, & Yesterday’s News as the absorbents for nitrate salts.

**Fall 2012** – Resumed processing of nitrate salts utilizing Rev. 36 of procedure EP-WCRR-WO-DOP-0233.

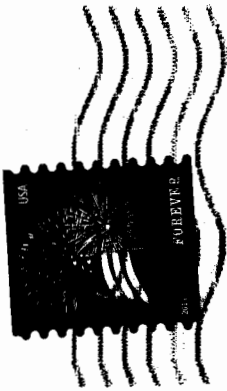
**January 2013 to present**- Utilized Swheat Scoop exclusively as the absorbent for nitrate salts except for one day (7/10/13) when we used ran out of Swheat Scoop and used 2 -14 lb bags of Tidy Cat.

## Nitrate Salt Processing Timeline

**March 20, 2013** - Rev. 37 of procedure EP-WCRR-WO-DOP-0233 issued implementing a minimum 3:1 ratio (absorbent to nitrate salts). Implemented to further reduce number of POCs and ensure no failures due to liquids. This change also proceduralized neutralizing of free liquids. Although personnel were trained to and always neutralized free liquids in the past, the step was added to strengthen the procedure.

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