ERID-524998 EP2014-5225

From: George, Victoria A Sent: Monday, July 14, 2014 3:31 PM

To: <u>Ryan.Flynn@state.nm.us;</u> <u>Jeff.Kendall@state.nm.us;</u> <u>tom.blaine@state.nm.us;</u> John Kieling; <u>steve.pullen@state.nm.us;</u> Kliphuis, Trais, NMENV; <u>Timothy.Hall@state.nm.us;</u> <u>siona.briley@state.nm.us;</u> <u>ricardo.maestas@state.nm.us</u>

Cc: Pete Maggiore; Silas DeRoma; Cummings, Lisa K; Nickless, David J; Bishop, M. Lee; Turner, Gene E; Armijo, Karen (CONTR); Wallace, Terry C; Mousseau, Jeffrey David; Cox, Daniel Ray; Woitte, Deborah Kay; Johns-Hughes, Kathryn W; Clemmons, Steve; Roberts, Kathryn Margaret; Brandt, Michael Thomas; Sharp-Geiger, Raeanna Racine; Dorries, Alison Marie; Grieggs, Tony; Haagenstad, Mark P; Bacigalupa, Gian A; Vigil-Holterman, Luciana R; Alexander, Rick A; Allen, Don; Zwick, Bill; Martinez, Saundra; Sauer, Selena Z; Wood, Yvonne Barbara; Schreiber, Arleen Thorn **Subject:** Daily Technical Call Submission - July 14, 2014

Attached is the written daily technical submission for today. The Permittees are submitting this pursuant to: Section 19 of the May 19, 2014, *Administrative Order; the* July 10, 2014 letter from NMED regarding *Modification to May 19, 2014, Administrative Order;* and Section VIII of the May 29, 2014, *Revised LANL Nitrate Salt-Bearing Waste Container Isolation Plan.*

If you have any revisions, please let me know.

We will talk with you on tomorrow's call.

Thank you

Tori

Tori George Program Director Los Alamos National Laboratory 505.606.2337 505.695.4347

NMED / LANL Technical Summary July 14, 2014

LANL Technical Update:

• Location of Nitrate Salt-Bearing Wastes

- o Remediated nitrate salt-bearing waste containers.
 - All containers remain in the 375 Permacon.
- o Unremediated nitrate salt-bearing waste containers.
 - All containers remain in the 231 Permacon.

• Monitoring - Daily Temperature

• Temperatures remain below 90°F.

• Monitoring – Visual Inspections

• No abnormal conditions.

• Additional measures currently underway

- As a conservative measure, LANL is currently conducting additional monitoring. This additional monitoring includes:
 - Container 68685.
 - Collecting a daily head space gas sample.
 - \circ CO₂, H₂ and N₂O continuing analytical.
 - LANL also continuing *solid phase micro-extraction* technique.
 - Hourly temperature measurements.
 - Temperatures remain below 90°F.
 - Seven other SWB overpacks (containing 55-gallon drums of remediated nitrate salt bearing waste).
 - Collecting a daily head space gas sample.
 - \circ CO₂, H₂ and N₂O continuing analytical.
 - LANL also continuing *solid phase micro-extraction* technique.
- Anticipated Changes to Nitrate Salt-Bearing Waste Containers (e.g. movement, re-packaging).
 - Currently, no further movements or re-packaging are planned.

- Other
 - Frequency of daily technical calls
 - In a July 10, 2014 letter, NMED modified the frequency of the daily technical calls between NMED and the Permittees to twice per week. The calls will now be Tuesday and Thursday, and the next scheduled technical call will be Tuesday, July 15, 2014. The Permittees will continue to provide updates in daily written submissions to NMED on business days Monday through Friday.

Summary Chart - Requested Information / Pending Issues:

	Requested Information	Actionee	Status	Completion Date
1.	NMED contact / process for LANL to notify NMED under the Revised Isolation Plan (e.g., 24 hour notices).	NMED		Complete June 5, 2014
2.	Keep NMED informed on the status of on-going chemistry / analytical work.	LANL		Complete June 9, 2014
3.	On upcoming daily call, provide additional discussion on the potential for liquids in the 378 post-1991 cemented containers (including a discussion of the review of RTR tapes).	LANL	In progress. Provided additional discussion on June 6, 2014 call. Meeting scheduled, for July 18.	
4.	On upcoming call, provide additional discussion on why 231 and 375 Permacon fire suppression systems are not part of the LANL RCRA Hazardous Waste Facility Permit Contingency Plan.	LANL		Complete June 5, 2014
5.	Send copy of June 4, 2014 written daily submission to Trais Kliphuis. Also, include her on future daily submissions.	LANL		Complete June 5, 2014
6.	Provide LANL procedures and example records associated with post-1991 TA-55 cementation process discussed on June 6.	LANL		Complete July 3, 2014
7.	Provide information on numbers of containers in the post-1991 cemented waste streams from the TA-55 process discussed on June 6. This should include numbers regarding RTR status (RTR'd, meet WIPP criteria, requiring remediation).	LANL		Complete June 17, 2014 (Supplemental Info July 3)
8.	Provide RTR video and pre-screening information associated with those containers requiring remediation from the post-1991 cemented waste streams from the TA-55 process discussed on June 6.	LANL		Complete July 3, 2014

9.	Provide copy of CCP/LANL Interface	LANL		Complete
	Document.			June 9, 2014
10.	Provide a list of the analytes for which LANL is sampling HSG (CO ₂ and LFL analytes).	LANL		Complete
		T ANT		June 11, 2014
11.	Discuss potential sampling of HSG for NO _x .	LANL		Complete
12	Follow we with Tim Holl generating LANI	LANL	Llumour a dista d Domont	June 16, 2014
12.	Follow-up with Tim Hall regarding LANL Hazardous Waste Facility Permit and procedures that LANL is developing for possible future sampling of empty parent containers and unremediated nitrate salt-bearing containers at LANL.	LANL	Unremediated Parent In progress.	Empty Parent Complete June 16, 2014
13.	Respond to NMED email request for information associated with the nitrate salt-bearing parent and daughter waste containers.	LANL	In progress – remaining items are portions of items 2 and 8, and all of item 5.	Partially Complete. July 9, 2014 (Letter sent addressing items 1-4 and 6-9 of the email request)
14.	NMED will review the Round Sheets (provided in June 11 summary) and inform LANL if these should be attachments to the Revised Plan, or if they fall under the provision in Section I of the Revised Isolation Plan and their identification during this technical call is sufficient.	NMED	NMED has reviewed Round Sheets – no comments / direction at this time. NMED will address any comments in their formal response to Revised Container Isolation Plan.	Complete June 23, 2014
15.	NMED has requested 'copies of any waste processing, treatment, characterization stop orders issued since Feb 14, 2014.'	LANL		Complete June 13, 2014 (Included w/ daily summary) Complete June 16, 2014 (Discussed current TA-54 & WCRRF operations)
16.	NMED requested information on the location of drums 68327 and 68328. Request made June 14.	LANL		Complete
17	Undets on LANI offerta including LANI	LANIL /		June 14, 2014
17.	Update on LANL efforts – including LANL teams. (On June 20 call, LANL offered to schedule an update meeting).	LANL / NMED		Complete July 2, 2014

18.	Neutralizer use in association with container S855793 (parent of 68660 and 68685).	LANL		Complete
	,			June 25, 2014
19.	List of nitrate salt-bearing waste containers that LANL records indicate contain absorbed liquids with the same neutralizer, as discussed during June 25 technical call.	LANL	In progress.	
20.	Schedule follow-on update on LANL efforts – including teams.	LANL / NMED	In progress. NMED to propose meeting dates – potentially first 2 weeks in August (per July 8 call).	
21.	NMED requested information on document approval / review (as discussed on July 3 call).	LANL	In progress.	
22.	What analyses will be conducted on samples taken from empty drums that previously contained nitrate salt-bearing waste.	LANL		Complete July 7, 2014
23.	NMED requested the following information on cemented waste containers generated from TA-55, that are currently stored above-ground at Area G: container id number; location; form (cans or monoliths); and type of concrete. Additionally, NMED requested information on pH adjustment during waste generation process, and information on anticipated pH of free liquids (and rationale).	LANL	In progress. Will include discussion of pH questions in meeting responding to Item #3.	
24.	NMED requested the procedure for sampling empty parent drums that previously contained nitrate salt-bearing waste.	LANL	EP-AREAG-WO-DOP- 1245 is included in Enclosure 1 to LANL's July 3, 2014 Response to Request for Information on Management of Waste at LANL.	Complete July 8, 2014
25.	NMED requested an additional discussion on a future technical call regarding CO ₂ , including data.	LANL	In progress. Will include trending information in next technical meeting (August).	

Next Call:

Tuesday, July 15, 2014 - at 10 am.