From: Schreiber, Arleen Thorn

Sent: Friday, August 08, 2014 2:33 PM

To: Allen, Don; Ryan.Flynn@state.nm.us; Jeff.Kendall@state.nm.us; tom.blaine@state.nm.us; John Kieling; steve.pullen@state.nm.us; Kliphuis, Trais, NMENV; Timothy.Hall@state.nm.us; siona.briley@state.nm.us; <a href="mailto:siona.briley@state.nm

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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; Martinez, Saundra; Sauer, Selena Z; Wood, Yvonne Barbara; Nevergold, Debra Sue; Maestas, Pamela Therese; George, Victoria A **Subject:** RE: Daily Technical Submission - August 8, 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.

Thank you

Arleen Schreiber for Tori George

NMED / LANL Technical Summary

August 8, 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
 - o Temperatures remain below 90°F.
- Monitoring Visual Inspections
 - o 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.
 - o CO₂, H₂ and N₂O continuing analytical.
 - o LANL also continuing solid phase micro-extraction.
 - Hourly temperature measurements.
 - o Temperatures remain below 90°F.
 - Other SWB overpacks (containing 55-gallon drums of remediated nitrate salt-bearing waste).
 - Collecting a daily head space gas sample.
 - o CO₂, H₂ and N₂O continuing analytical.
 - 1 of these SWBs (SB50522) LANL will also:
 - o Continue solid phase micro-extraction.
 - o Continue hourly temperature measurements.
 - LANL plans to conduct head space gas sampling on each of the 55 SWBs that contain 55-gallon drums of remediated nitrate salt-bearing waste.
 - To date, LANL has conducted head space gas sampling of 48 of the 55 SWBs in the 375 Permacon.
 - Sampling of the remaining 7 SWBs began yesterday, 8/7/14, and is ongoing.

- Anticipated Changes to Nitrate Salt-Bearing Waste Containers (e.g. movement, repackaging).
 - o Currently, no further movements or re-packaging are planned.

• Other

- o Sampling empty parent container.
 - LANL has completed preparation to sample the empty parent container of drum 68660. Empty parent container was sampled on 8/7/14.

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 ongoing chemistry / analytical work.	LANL		Complete June 9, 2014
3.	On upcoming daily call, provide additional discussion on the potential for liquids in the 350 post-1991 cemented containers (including a discussion of the review of RTR tapes).	LANL		Complete July 6, 2014 (Discussion on call) July 18, 2014 (Meeting held)
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 provided 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
11.	Discuss potential sampling of HSG for NO _x .	LANL		June 11, 2014 Complete
11.	Discuss potential sampling of 1150 for 100x.	L'H\L		Complete
				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 saltbearing containers at LANL.	LANL	Unremediated Parent In progress – will include information on sampling of S802701 and S813389 (occurred before the May 19 Administrative Order) in next technical meeting (August 14).	Empty Parent Complete June 16, 2014
13.	Respond to NMED email request for information associated with the nitrate saltbearing parent and daughter waste containers. WIPP Recovery Daily Meeting Action List item #84 – NMED requested a copy of the LANL remediation records for waste stored in Panel 6 (Trais Kliphuis) – is a subset of the information in item 5 of this action.	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) July 17, 2014 (Letter sent with updated spreadsheet.) August 7, 2014 First submittal in response to item 5 sent to NMED.
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) 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 June 14, 2014
17.	Update on LANL efforts – including LANL	LANL /		Complete
	teams. (On June 20 call, LANL offered to	NMED		

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				July 21, 2014
29.	NMED requested a copy of lessons learned	LANL	In signature	
30.	NMED requested a copy of empty drum	LANL	Still in draft	
	sampling presentation			

Next Call: Tuesday, August 12, 2014 at 10 am.