From: Allen, Don

Sent: Tuesday, August 12, 2014 2:58 PM

To: Ryan.Flynn@state.nm.us; Jeff.Kendall@state.nm.us; tom.blaine@state.nm.us; John Kieling;

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Subject: Daily Technical Submission - August 12, 2014

Folks,

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 Don Allen for Tori George

NMED / LANL Technical Summary

August 12, 2014

Participation:

- New Mexico Environment Department: Tim Hall, Ricardo Maestas, Siona Briley, Steve Holmes, Coleman Smith
- LANL Los Alamos Field Office: Dave Nickless
- LANL Los Alamos National Security: Don Allen, Mark Haagenstad

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
 - 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.
 - \circ 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 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.
 - Empty parent container 69120 sampled on 8/7/14. Note: Original parent ID #S855793 was renumbered to 69120 when empty.
 - During sampling, the operator removing the TID on empty container 69120 was not a qualified TID custodian as required by the TID User Manual. However, chain of custody was maintained and observers verified that the process for removing the TID was completed in accordance with the TID User Manual.

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

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7.	Provide information on numbers of containers in the post 1001 comented wests streams from	LANL		Complete
	in the post-1991 cemented waste streams from the TA-55 process discussed on June 6. This			June 17, 2014
	should include numbers regarding RTR status			
	(RTR'd, meet WIPP criteria, requiring			(Supplemental Info
	remediation).			provided July 3)
8.	Provide RTR video and pre-screening	LANL		Complete
	information associated with those containers			
	requiring remediation from the post-1991			July 3, 2014
	cemented waste streams from the TA-55 process discussed on June 6.			
9.	Provide copy of CCP/LANL Interface	LANL		Complete
). 	Document.	LANL		Complete
				June 9, 2014
10.	Provide a list of the analytes for which LANL	LANL		Complete
	is sampling HSG (CO ₂ and LFL analytes).			
				June 11, 2014
11.	Discuss potential sampling of HSG for NO _x .	LANL		Complete
				Juno 16, 2014
12.	Follow-up with Tim Hall regarding LANL	LANL	Unremediated Parent	June 16, 2014 Empty Parent
12.	Hazardous Waste Facility Permit and	Lint	In progress – will	Complete
	procedures that LANL is developing for		include information on	June 16, 2014
	possible future sampling of empty parent		sampling of S802701	
	containers and unremediated nitrate salt-		and S813389 (occurred	
	bearing containers at LANL.		before the May 19 Administrative Order)	
			in next technical	
			meeting (August 14).	
13.	Respond to NMED email request for	LANL	In progress –	Partially Complete
	information associated with the nitrate salt-		remaining items are portions of items 2, 5	Intr. 0. 2014
	bearing parent and daughter waste containers.		and 8.	July 9, 2014 (Letter sent addressing
	WIPP Recovery Daily Meeting Action List			items 1-4 and 6-9 of
	item #84 – NMED requested a copy of the		Items #2 and #8 are	the email request)
	LANL remediation records for waste stored in		in signature.	July 17, 2014
	Panel 6 (Trais Kliphuis) – is a subset of the			July 17, 2014 (Letter sent with
	information in item 5 of this action.			updated spreadsheet.)
				August 7, 2014
				First submittal in response to item 5 sent
				to NMED.
14.	NMED will review the Round Sheets	NMED	NMED has reviewed	Complete
	(provided in June 11 summary) and inform		Round Sheets – no	
	LANL if these should be attachments to the		comments / direction at this time. NMED will	June 23, 2014
	Revised Plan, or if they fall under the		address any comments	
	provision in Section I of the Revised Isolation Plan and their identification during this		in their formal response	
	technical call is sufficient.		to Revised Container	
15		LANL	Isolation Plan.	Complete
15.	NMED has requested 'copies of any waste processing, treatment, characterization stop	LANL		Complete
	processing, treatment, characterization stop			

16.	NMED requested information on the location of drums 68327 and 68328. Request made June 14. Update on LANL efforts – including LANL	LANL /		June 13, 2014 (Included w/ daily summary) June 16, 2014 (Discussed current TA-54 & WCRRF operations) Complete June 14, 2014 Complete
	teams. (On June 20 call, LANL offered to schedule an update meeting).	NMED		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. Meeting scheduled for August 14.	
21.	NMED requested information on document approval / review (as discussed on July 3 call).	LANL		Complete July 29, 2014
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		Complete July 17, 2014 (Letter sent w/information) July 18, 2014 (Meeting held)
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 14).	
26.	NMED requested additional discussion on CIN-01 waste containers and absorbent, including confirmation and extent of use.	LANL		Complete July 18, 2014 (Meeting held)
27.	NMED requested historic analytical information on pH of liquids associated with gypsum cemented waste.	LANL		Complete August 7, 2014 (Letter sent w/information)
28.	NMED requested link to pdf of Actinide Quarterly edition (3 rd Q 2008).	LANL		Complete July 21, 2014
29.	NMED requested a copy of lessons learned	LANL		Complete August 11, 2014
30.	NMED requested a copy of empty drum sampling presentation	LANL	Still in draft	
31.	Respond to NMED email request dated 8/12/2014 for information associated with the nitrate salt-bearing waste containers.	LANL	In Progress	

Next: Thursday, August 14, 2014 technical meeting in lieu of call.