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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 23, 2019

Doug Hintze, Manager
Environmental Management
U.S. Department of Energy
Los Alamos Field Office
P.O. Box 1663 MS M984
Los Alamos, NM 87545

William S. Goodrum, Manager
National Nuclear Security Administration
Los Alamos Field Office
LANL MS-A316
3747 West Jemez Road

**RE: REQUEST FOR INFORMATION
TRU WASTE CONTAINERS STORED AT AREA G, TA-54
LOS ALAMOS NATIONAL LABORATORY
EPA ID #NM0890010515
HWB-LANL-MISC**

Dear Messrs. Hintze and Goodrum:

It has come to the New Mexico Environment Department's (NMED) attention that several waste containers generated by the Department of Energy (DOE), Los Alamos National Laboratory (LANL), did not meet the Waste Acceptance Criteria (WAC) for the Waste Isolation Pilot Plant (WIPP).

The Central Characterization Program (CCP) Basis of Knowledge (BoK) evaluation dated June 25, 2019, found that "[N]ine (9) containers have been determined to be non-compliant or lack sufficient information to determine their status with the BoK criteria". These containers were to be placed on an administrative hold. The BoK determined that all nine containers are transuranic (TRU) debris waste containers which were generated in the Chemistry and Metallurgy Research Facility at Technical Area 03 and are predominately composed of mixed heterogenous debris. Two containers (LA00000069044 and LA00000069506) were generated

during the time LANL was using sWheat Scoop kitty litter as a sorbent. The specific sorbent used for these two containers is not identified. It was assumed that liquid was neutralized nitric acid containing metal nitrates, potential oxidizers. Three containers (LA00000083179, LA00000091085, and LA00000068163) have the potential for having nitric acid sorbed with either an inorganic sorbent (totalsorb) or an organic polymer absorbent (Waste Lock 770) but the specific sorbent which was used has not been identified.

In addition, the CCP Non-conformance Report (NCR) signed August 5, 2019, and referenced by NCR-LANL-0457-19, identified 4 additional containers (68154, 68155, 68161, and 68264) that were rejected due to the potential of an oxidizing chemical being sorbed into an organic polymer (either Waste Lock 770 or NoChar) within the containers.

Based on the information contained in the above paragraphs, NMED is concerned that potentially hazardous and incompatible waste may have been stored in these containers, and any additional containers that were rejected by CCP for similar reasons. Please provide NMED with the following information:

For the waste containers which did not meet the waste acceptance criteria for WIPP please provide:

1. Any documentation associated with the characterization of the waste in each of these containers, including known or estimated quantities of potentially hazardous constituents/waste within the container;
2. the numbers assigned to the containers and dates of generation;
3. the specific location where the wastes were generated, including the technical area, building, room, glove box, etc.; and
4. the hazardous waste numbers (e.g., D002) if associated with these containers and the dates that those numbers were assigned to the containers.

Please provide a response to NMED within 30 days of the date of this letter. If you have any questions regarding the information request, please contact me at (505) 476-6035.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

Messrs. Hintze and Goodrum
September 23, 2019
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cc:

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S. Briley, NMED HWB
M. Schatz, NMED HWB
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E. Torres, Triad
E. Lowes, N3B
P. Padilla, Triad
E. Day, N3B

File: 2019 LANL, LANL Permit, Information Request Regarding TRU Waste Containers at TA-54, Area G