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CERTIFIED MAIL
RETRN RECEIPT REQUESTED

March 29, 2000

Dr. John Browne, Director
Los Alamos National Laboratory
Post Office Box 1663, MS A100
Los Alamos, New Mexico 87545

Mr. David A. Gurule, Area Manager
Los Alamos Area Office
Department of Energy
528 35th Street, MS A1316
Los Alamos, New Mexico 87544

Re: Request for Supplemental Information
For the October 1998, General Part B Permit Application, Revision 1.0
Los Alamos National Laboratory (LANL) EPA I. D. NM0890010515

Dear Dr. Brown and Mr. Gurule:

The RCRA Permits Management Program (RPMP) of the Hazardous and Radioactive Materials Bureau (HRMB) has reviewed DOE/LANL's May 12, 1999, General Part B Permit Application, Revision 1.0 for administrative completeness and determined it to be incomplete.

Enclosed please find the specific information requested listed in Attachment A. Where revision is necessary, please forgo the technique of submitting only replacement pages, and instead submit a revision incorporating the entire revised sections in redline/strikeout and clean versions (in Microsoft Word 97). The replacement page technique may lead to deletion of lines, paragraphs and entire sections, producing a virtually unreadable application.

DOE/LANL must respond to this request for supplemental information within thirty (30) calendar days of receipt of this letter. If DOE/LANL does not submit a complete response within thirty (30) calendar days a Notice of Deficiency will be issued.

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Dr. Browne & Mr. Gurule
March 29, 2000

RSI General Part B Permit Application
Page 2 of 5

Should you have any questions regarding this letter, please contact me at (505) 827-1558 extension 1012, or Lee Winn at (505) 827-1558 extension 1029.

Sincerely,

Lee Winn for John E. Kieling

John E. Kieling, LANL Project Leader
RCRA Permits Management Program

JEK/lw

cc w/attachments:

J. Bearzi, NMED HRMB
K. Fisher, NMED OGC
J. Kieling, NMED HRMB
L. Winn, NMED HRMB
J. Young, NMED HRMB
P. Young, NMED HRMB
D. Neleigh, EPA, 6PD-N
H. LeDoux, DOE LAAO, MS A316
J. Plum, DOE LAAO, MS A316
J. Elvinger, LANL ESH-19, MS K490
File: Reading and RED LANL G/P '00

ATTACHMENT A
Request for Supplemental Information
For the October 1998, General Part B Permit Application, Revision 1.0
Los Alamos National Laboratory (LANL) EPA I. D. NM0890010515

Specific Comments:

Appendix F-Closure Plan

1. **Section F.1.9. "If decontamination to establish cleanup levels is not achievable, LANL will amend this closure plan to address appropriate closure procedures or post-closure care requirements pursuant to 20 NMAC 4.1, Subpart V, 264.117 through 264.120 [1-1-97]."** LANL should provide, (in applicable technical-area specific chapters), a written post-closure plan for all land-based-units pursuant to 20 NMAC 4.1, Subpart V, §270.14(b)(13) to comply with subparts F, K, L, M, N and X.

Appendix B - Waste Analysis Plan [WAP]

Section B.1.1 Facility Waste-Generating Processes and Activities

2. **Section B.3 1.1 Acceptable Knowledge.** The last bullet on the top of page B-25 seems to misquote the guidance. **"Wastes containing heterogeneous materials, where the physical nature of the waste does not lend itself to taking a representative sample (e.g. laboratory trash and construction debris with surface contamination.)"** There is no mention of "trash" in the quoted guidance. LANL should revise this statement.
3. **Section B.3.1.1.1 Process Knowledge.** The process knowledge described in this permit application reflects what is called Supplemental Process Knowledge in the WIPP permit. In order to be consistent, for all waste subject to the WIPP permit referenced in number 9 below, the process knowledge section should be changed in the permit application to reflect process knowledge as identified in the WIPP permit.
4. **Section B.2.1 Proposed Analytical Parameters and Methods (page B-21).** For consistency within the permit, the acceptable knowledge criteria for all waste streams should be the same as the acceptable knowledge criteria for mixed TRU waste characterization (including the revisions to process knowledge in number 3 above).
5. **Section B.3 Characterization Procedures. Page B-22.** LANL should include characterization procedures for the solidification/cementation treatment process.

6. **Section B.3.1.1 Acceptable Knowledge (second bullet on top of page B-25).** “(e.g., **radioactive mixed waste**)”, the *e.g.* meaning ‘for example’ should be replaced by *i.e.* meaning ‘that is.’
7. **Section B.3.1.3 Verification and Reevaluation Frequencies. Page B-29.** “**Reevaluation of initial characterization information may be performed to verify the accuracy of the initial waste characterization; to verify that applicable treatment standards have been met; when there is a change in a waste-generating process; when the generator requests a review; or when analytical results indicate a change in a waste stream.**” Because LANL has chosen to describe waste categories rather than waste streams in the permit application, LANL should provide an example of acceptable knowledge documentation for each waste category.
8. **Section B.3.1.3 Verification and Reevaluation Frequencies. Page B-30.** “**Hazardous waste received at the waste management unit for storage will be randomly selected for verification by acceptable knowledge or sampling and analysis at a rate of 1 percent of received waste streams characterized by acceptable knowledge per year**”. LANL should include in the permit application a discussion the Solid Waste Organization's (SWO's) process for waste verification and non-conformance tracking.
9. **Section B.3.2 Mixed TRU Waste Certification Plan (page B-31, second paragraph).** “**Because these references are subject to change as new information is provided, developed, or approved, and because LANL is not subject to their requirements in LANL’s operating permit for storage, but rather utilizes them as waste management guidelines this WAP will not be modified as ongoing changes to the referenced documents occur.**” If this is the case, then LANL should make sure the correct documents are referenced in this permit application. Please refer to the “Hazardous Waste Facility Permit issued to the Waste Isolation Pilot Plant EPA No. NM4890139088, October 27, 1999”.
10. **Section B.3.2.1 Mixed TRU Waste Certification Plan (page B-31, third paragraph).** “**The “Los Alamos TRU Waste Certification Plan” (TWCP) (LANL, 1991) incorporates the certification requirements of the “Waste Acceptance Criteria for the Waste Isolation Pilot Plant” (WIPP WAC) (DOE, 1996b) for mixed TRU waste that will be sent to that site.**” LANL should insert the phrase ‘or most recent version’ after the (WIPP WAC) (DOE, 1996b) reference.
11. **Section B.2.2.1 Real-Time Radiography (page B-32, first paragraph).** “**The audio/visual tapes produced during the waste container scan will be maintained for a minimum of three years.**” LANL should verify that this time period is consistent with the WIPP permit referenced in number 9 above.

12. **Section B.2.2.1 Real-Time Radiography (page B-33, fourth paragraph).** The referenced "TRU Waste Characterization Sampling and Analysis Methods Manual" (DOE, 1996c) is no longer the acceptable reference since the WIPP permit has become effective. LANL should provide the correct reference for this procedure from the WIPP permit referenced in number 9 above.
13. **Section B.3.2.2.2 Visual Examination (page B-34, last paragraph).** LANL references the WIPP QAPP that has been removed from the approved WIPP permit. LANL should refer to the correct documents (i.e. the WIPP QAPD, WAC, and Permit WAP).
14. **Section B.4 Off-Site Waste Acceptance Procedures.** The guidance document *Waste Analysis at Facilities that Generate, Treat, Store, and Dispose of Hazardous Wastes (OSWER 9938.4-03, April 1994)*, suggests that TSDFs receiving wastes from an off-site generator (or other facility), require a submittal of a Waste Profile Sheet (or comparable document) to the TSDF as a pre-acceptance condition. LANL failed to mention this form in their documentation requirements for off-site waste acceptance
15. The above referenced EPA guidance also states that: "The shipment received on site should be sampled and analyzed to the extent necessary to verify that it meets permit specifications and regulatory requirements. ...This may be accomplished by performing a systematic process of screening and analysis that allows for monitoring key indicator parameters. In some cases, however, more stringent waste analysis may be required." This application states that LANL intends to examine the waste for things such as pre-shipment inspection and physical examination for correct documentation once waste is received, but there is no mention of systematic analysis that allows for monitoring for prohibited items under the DOE WIPP WAC. LANL should address this oversight. LANL should also include a flow diagram for incoming waste shipment procedures.
16. **Supplement 6-Off-Site Waste Information (Introduction, page 6-1, first paragraph).** This supplement provides descriptions of hazardous or mixed waste streams proposed to be received from off-site facilities by waste management...." LANL should remove the reference to hazardous waste in this sentence. LANL is not requesting a permit to receive hazardous waste from off-site.
17. **Supplement 6-Off-Site Waste Information (Los Alamos National Laboratory Waste Acceptance Procedures, page B-3, second paragraph).** "The generator waste documentation will be collected and reviewed for completeness prior to shipment using LANL routine waste characterization procedures as described in this General Part B WAP." LANL should review for completeness by comparing to the WIPP WAP, not the General Part B WAP.