



**DEPARTMENT OF ENERGY**  
National Nuclear Security Administration  
Los Alamos Site Office  
Los Alamos, New Mexico 87544



MAY 30 2006

John Kieling, Manager  
RCRA Permits Management Program  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6303



Dear Mr. Kieling:

Subject: Transmittal of Class 1 Permit Modification to Module 3, Attachment F, and Attachment G of the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit, No. NM0890010515

The purpose of this correspondence is to transmit a Class 1 permit modification to the New Mexico Environment Department Hazardous Waste Bureau (NMED-HWB) from the U.S. Department of Energy National Nuclear Security Administration (DOE-NNSA) and University of California (UC). The permit modification makes minor text changes within Module 3, Attachment F, and Attachment G to delete a specific limitation on the type of Resource Conservation and Recovery Act (RCRA) hazardous waste stored at Area G.

This modification has been prepared in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1.900 NMAC) (incorporating Code of Federal Regulations [CFR], Title 40 270.42(a)(1)), revised October 1, 2003. The permit modification package includes replacement pages for Module 3, Attachment F and Attachment G and pages with editing marks detailing changes made to the LANL Hazardous Waste Facility Permit. The permit modification removes the word "mixed" and removes all references to activities specific to the Transuranic Waste Inspectable Storage Project (TWISP) in container storage areas TA-54-226,-229,-230,-231, and -232.

This modification is administrative or minor because it does not change the storage capacity or the types of waste to be stored at the permitted container storage units; it simply removes the current limitation that only mixed waste retrieved during the TWISP may be placed in Domes 226, 229, 230, 231 and 232 at TA-54, Area G. No additional Environmental Protection Agency (EPA) Hazardous Waste codes will be added by this modification.

Removing this limitation will relieve waste management operations from waste segregation and transportation activities now being performed at the site in response to artificial distinctions between radioactive classes of wastes. The basis for the Class 1 permit modification has been previously discussed with Kathryn Lynnes of your staff.



Included herein are three hard copies and one electronic submittal. The submittal includes a version of Module III and Attachments F and G with changes in redline/strikeout format and a clean format version of the edited text. Changes to text will be replaced in the LANL Hazardous Waste Facility Permit and will become effective seven days after the date of this letter. We will send a notice of the modification at that time to all persons on the NMED-HWB maintained LANL facility mailing list in compliance with 20.4.1.900 NMAC (incorporating 40 CFR Section 270.42 (a)(ii)).

If you have comments or questions regarding this permit modification, please contact Gene Turner of my staff, DOE-NNSA, at (505) 667-5794 or Jack Ellvinger, UC, at (505) 667-0633.

Sincerely,



Edwin L. Wilmot  
Manager

ES: 9GT-003

Enclosures

cc w/enclosure

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## MODULE III STORAGE IN CONTAINERS

### III.A. DESIGNATED STORAGE UNITS

1. Technical Area 54, Area L The Permittee may store for more than ninety days hazardous wastes in containers only in the following designated storage areas:
  - a. Containers containing free liquids may be stored on the concrete containment structure, Facility Number 54-32 and 54-58.
  - b. Containers containing free liquids may be stored in the packaging building, Facility Number 54-31.
  - c. Containers not containing free liquids may be stored, on pallets or otherwise elevated four inches, in a single layer in cleared areas within the fenced portion of Area L, subject to the limitations of HWMR-5, as amended 1989, Part V, 40 CFR Sections 264.175(c) and 264.175(d). Such containers shall not be stored within five feet of the perimeter fence, nor five feet of any structure, nor five feet of the paved or unpaved roadway. Disposal unit covers designed to serve as storage areas are not subject to this exclusion. See Figure 6.
  - d. Gas cylinders will be stored in cylinder racks, or on specially constructed pallets that provide support and restraint, under a self-supporting canopy located in cleared areas within the fenced portion of Area L, within the restrictions of permit paragraph II.G. above.
  - e. The fence line around Area L as shown in permit Figure 6 shall not be altered without prior notice to the Secretary and permit modification in accordance with HWMR-5, as amended 1989, Part IX, 40 CFR Section 270.41 or 270.42 as appropriate.
  - f. Containers containing free liquids may be stored in the modular storage buildings, Model 22 or equivalent, Facility Numbers 54-68 and 54-69, 54-70 for container storage located as shown in Figure 6.
2. Technical Area 50 The Permittee may store for more than ninety days hazardous wastes in containers only in the following designated storage areas:
  - b. Building 50-37. Containers may be stored within storage room 115, 117, and 118 of the of TA-50-37 as shown in Figure 4.
  - c. Containers containing free liquids may be stored in the modular storage buildings, 0Model 22 or equivalent, Facility Number 50-114.
3. Technical Area 50 The Permittee may store for more than ninety days hazardous and/or mixed wastes in containers only in the following designated storage areas:

- b. Containers not containing free liquids may be stored on pallets, dollies, or otherwise elevated in Building 50-69, Indoor Container Storage Area ( Rooms 102 and 103), and at the Building 50-69 Outdoor Container Storage Area (CSA). Containers containing suspect or known free liquids may be stored on self-containment pallets in Building 50-69, Rooms 102 and 103, and at the Building 50-69 Outdoor CSA. Containers will not be stacked at the Building 50-69, Rooms 102 and 103, storage areas. Containers may be stacked two high at the Building 50-69 Outdoor CSA. See Figure 12.
4. Technical Area 54 West The Permittee may store for more than ninety days mixed wastes in containers only in the following designated storage areas.
- a. Building 54-38 Low Bay CSA. Containers not containing free liquids may be stored on pallets or dollies in the Low Bay CSA. Containers containing suspect or known liquids may be stored on self-containment pallets in the Low Bay CSA. Containers will not be stacked at this storage area. See Figure 13.
  - b. Building 54-38 High Bay CSA. Containers not containing free liquids may be stored on pallets or dollies or otherwise elevated in the High Bay CSA. Containers containing suspect or known liquids may be stored on self-containment pallets in the High Bay CSA. Containers will not be stacked at this storage area. See Figure 13.
  - c. Building 54-38 Loading Dock CSA. Containers may be stored on self-containment pallets in the Loading Dock CSA. Containers will not be stacked at this storage area. See Figure 13.
  - d. Building 54-38 Outdoor CSA. Drums of waste may be stored on self-containment pallets in the Outdoor CSA. Other types of waste containers that are elevated by design may be stored in the Outdoor CSA. Containers will not be stacked at this storage area. See Figure 13.
3. Technical Area 54, Area G The Permittee may store for more than ninety days wastes in containers only in the following designated storage areas:
- a. Waste containers potentially containing free liquids may be stored at TA-54-230 and on Storage Pad 10. Secondary containment will be used for containers with liquid items stored on the asphalt pad. See Figure 11.
  - b. Waste containers not containing free liquids may be stored at TA-54-226, TA-54-229, TA-54-230, TA-54-231, TA-54-232, and on Storage Pad 10. See Figure 11.
  - c. All Waste containers stored at TA-54-226, TA-54-229, TA-54-230, TA-54-231, and TA-54-232 will be placed on pallets or otherwise elevated four inches. Palletized 55-gallon containers may be stored in groups of four and stacked three high. Palletized overpack containers may be stacked two high. Large containers (80-, 83-, 85-, and 99-gallon drums) will also be stored on pallets but will not be stacked. Fiberglass-reinforced plywood (FRP)

- b. Containers not containing free liquids may be stored on pallets, dollies, or otherwise elevated in Building 50-69, Indoor Container Storage Area ( Rooms 102 and 103), and at the Building 50-69 Outdoor Container Storage Area (CSA). Containers containing suspect or known free liquids may be stored on self-containment pallets in Building 50-69, Rooms 102 and 103, and at the Building 50-69 Outdoor CSA. Containers will not be stacked at the Building 50-69, Rooms 102 and 103, storage areas. Containers may be stacked two high at the Building 50-69 Outdoor CSA. See Figure 12.
4. Technical Area 54 West The Permittee may store for more than ninety days mixed wastes in containers only in the following designated storage areas.
    - a. Building 54-38 Low Bay CSA. Containers not containing free liquids may be stored on pallets or dollies in the Low Bay CSA. Containers containing suspect or known liquids may be stored on self-containment pallets in the Low Bay CSA. Containers will not be stacked at this storage area. See Figure 13.
    - b. Building 54-38 High Bay CSA. Containers not containing free liquids may be stored on pallets or dollies or otherwise elevated in the High Bay CSA. Containers containing suspect or known liquids may be stored on self-containment pallets in the High Bay CSA. Containers will not be stacked at this storage area. See Figure 13.
    - c. Building 54-38 Loading Dock CSA. Containers may be stored on self-containment pallets in the Loading Dock CSA. Containers will not be stacked at this storage area. See Figure 13.
    - d. Building 54-38 Outdoor CSA. Drums of waste may be stored on self-containment pallets in the Outdoor CSA. Other types of waste containers that are elevated by design may be stored in the Outdoor CSA. Containers will not be stacked at this storage area. See Figure 13.
  3. Technical Area 54, Area G The Permittee may store for more than ninety days ~~mixed~~-wastes in containers only in the following designated storage areas:
    - a. ~~Mixed waste~~-Waste containers potentially containing free liquids may be stored at TA-54-230 and on Storage Pad 10. Secondary containment will be used for containers with liquid items stored on the asphalt pad. See Figure 11.
    - b. ~~Mixed waste~~-Waste containers not containing free liquids may be stored at TA-54-226, TA-54-229, TA-54-230, TA-54-231, TA-54-232, and on Storage Pad 10. See Figure 11.
    - c. All ~~mixed waste~~-Waste containers stored at TA-54-226, TA-54-229, TA-54-230, TA-54-231, and TA-54-232 will be placed on pallets or otherwise elevated four inches. Palletized 55-gallon containers may be stored in groups of four and stacked three high. Palletized overpack containers may be stacked two high. Large containers (80-, 83-, 85-, and 99-gallon drums) will also be stored on pallets but will not be stacked. Fiberglass-reinforced

boxes may be stacked two high, at a maximum. Within the modular units at Storage Pad 10, the drums will be elevated above the storage area floor on wheeled drum dollies or steel pallets. For waste stored outdoors on the pad, containers will be protected from storm water run-on/runoff through the use of pallets (or otherwise elevated four inches). Tarpaulins or covers will be used to protect containers and containment pallets from precipitation.

### III.B. AUTHORIZED WASTES

1. Identification Only hazardous and/or mixed wastes identified in Permit Attachment G. with the process code "S01" in column D.1. "Processes" shall be stored.
2. Quantities The cumulative quantity of individual hazardous and/or mixed wastes in storage at any one time at the facility shall not exceed the quantity indicated in Permit Attachment G. Column B. "Estimated Annual Quantity of Waste".
3. Land Ban The Permittee must also comply with the following regarding storage of its wastes in containers which are prohibited from land disposal. These restrictions are imposed on any waste as it becomes prohibited from land disposal. (New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20 NMAC 4.1), Subpart VIII, 268.50, revised November 1, 1995)
  - a. A storage period of one year is permitted. A storage period beyond one year is permitted provided there is proof that such storage is solely for the purpose of accumulation of such quantities as are necessary to facilitate proper recovery, treatment or disposal.
  - b. Each container must be clearly marked as to its contents and the date each period of accumulation begins.
  - c. Hazardous wastes meeting the treatment standards in 20 NMAC 4.1, Subpart VIII, 268.41, 268.42, 268.43, revised November 1, 1995, are not subject to the storage prohibition. Hazardous wastes meeting the treatment standards specified under the variance in 20 NMAC 4.1, Subpart VIII, 268.44, revised November 1, 1995, are not subject to the storage prohibition.

### III.C. CONTAINERS

1. Capacity
  - a. Lab-packed wastes shall be stored in containers not to exceed 55-gallon nominal capacity.
  - b. Bulk liquids may be stored in drums of a nominal capacity of 55-gallons or less.
  - c. Solidified hazardous and/or mixed wastes not containing free liquids may be stored in containers meeting U.S. Department of Transportation (DOT) requirements for transportation.

- d. Compressed gases may be stored in any sized cylinder. Small cylinders may be packed in drums or crates complying with DOT shipping regulations.
  - e. Polyethylene containers of 220-gallon or 330-gallon capacity may be used in place of 55-gallon drums as long as secondary containment capacity criteria of HWMR-5, as amended 1989, Part V, 40 CFR Section 264.175(b)(3) are not exceeded.
2. Type Containers must be of a type specified in the DOT hazardous materials regulations, 49 CFR parts 171 to 179, which specify authorized containers for the waste. As applicable, the containers shall be either: (1) previously unused or reused according to DOT requirements; (2) the original shipping containers in which the material was first marketed; or (3) any other suitable container which satisfies the requirements of permit paragraph III.C. If the hazardous and/or mixed wastes are to be received and stored in their original shipping containers, the Permittee must ensure that the requirements of permit paragraph III.C. are satisfied. Polyethylene bulk containers shall meet or exceed DOT requirements. Compressed gas cylinders not meeting DOT requirements shall be segregated in a safe area.
3. Quantity The following quantities include all stored liquid materials, whether regulated or not. Solid materials which do not displace containment capacity may be collocated without affecting these volumes. Solid materials which displace containment volume shall be included in calculating the stored volume as if they were liquids. The Permittee shall keep current accurate records of the quantity of waste in storage at each location below to ensure that these capacities are not exceeded.
- a. No more than 440 gallons of liquid shall be stored at Technical Area 54, Area L, Building Number 54-31.
  - b. No more than 17,220 gallons of liquid shall be stored at each concrete containment structure: facility Number 54-32.
  - c. No more than 3600 containers of 55-gallon capacity or less, or the equivalent volume of 26,470 cubic feet, 980 cubic yards or 749 cubic meters, shall be used to store solidified wastes at Technical Area 54, Area L.
  - d. No more than 3,630 gallons of liquid shall be stored in Building 50-37, Rooms 115, 117, and 118 combined.
  - e. No more than 1,650 gallons of waste shall be stored in each modular storage unit.
  - h. No more than 1,500 gallons of waste shall be stored at the Building 50-69 Indoor CSA (Rooms 102 and 103). No more than 30,000 gallons of waste shall be stored at the Building 50-69 Outdoor CSA.
  - i. No more than 2,200 gallons of waste shall be stored at the Building 54-38 High Bay CSA. No more than 880 gallons of waste shall be stored at the Building 54-38 Low Bay CSA.

No more than 660 gallons of waste shall be stored at the Building 54-38 Loading Dock CSA. No more than 7,920 gallons of waste shall be stored at the Building 54-38 Outdoor CSA.

- g. No more than 970,000 gallons of waste shall be stored at TA-54-226. No more than 790,000 gallons of waste shall be stored at each of the following locations: TA-54-229, TA-54-230, TA-54-231, and TA-54-232. Of the 790,000-gallon total that may be stored in TA-54-230, no more than 93,995 gallons shall be potential liquid-bearing waste. No more than 970,000 gallons of waste shall be stored at TA-54, Area G, Pad 10.

#### 4. Condition

- a. If a container holding hazardous or mixed waste is not in good condition (e.g. severe rusting, structural defects) or if it begins to leak, the Permittee shall transfer the hazardous or mixed waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.
- b. The Permittee may use overpack containers of more than 55-gallon capacity to manage defective waste storage containers. Each overpacked container shall be recorded in the facility record.

#### 5. Compatibility of Waste with Containers

- a. The Permittee shall assure, as required by 20 NMAC 4.1, Subpart V, 264.172, revised November 1, 1995, that the ability of the container to contain the waste is not impaired. When necessary, this shall include procedures for determining whether the hazardous or mixed waste is no longer compatible with the shipping container if it is to be stored in its original container (e.g. determination of container adequacy for chemicals that have a finite shelf life or may change in composition upon aging).
- b. The Permittee shall not place into the polyethylene containers described in permit paragraph III.C.1.e. above, any material for which the manufacturer does not rate the container suitability as "Good" or "Excellent" in the current compatibility technical bulletin issued by the manufacturer. A copy of the current bulletin shall be available at the facility.

- 6. Management The Permittee shall manage containers as required by 20 NMAC 4.1, Subpart V, 264.173, revised November 1, 1995, and Permit Attachment F.

### III.D. CONTAINMENT

The Permittee shall construct and maintain the containment systems for each storage unit in permit paragraphs III.A. above in accordance with the requirements of 20 NMAC 4.1, Subpart V, 264.175, revised November 1, 1995.

### III.E. IGNITABLE OR REACTIVE WASTES

The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility property line.

### III.F. INCOMPATIBLE WASTES

The Permittee shall manage incompatible wastes or incompatible wastes and materials in accordance with the requirements of 20 NMAC 4.1, Subpart V, 264.177, revised November 1, 1995.

### III.G. CLOSURE

The Permittee shall comply with the Closure Plan, Permit Attachment E. and permit paragraph II.L. above, for closure of any permitted storage area.

### III.H. INSPECTION

1. Inspection Plan The Permittee shall inspect the storage areas in accordance with Permit Attachment B.
2. Spill Kits The type, presence, location and quantity of spill kits shall be verified and annotated monthly. If spill kits are locked up, the location of access keys shall be verified.
3. Warning Signs The legibility and condition of warning signs shall be included in the weekly inspection. Missing or illegible signs shall be promptly replaced within 24 hours of discovery.
  - a. Signs shall be at the entrances to the hazardous and mixed waste units. Collocated units may be included within one signed area.
  - b. Signs shall say "Danger, Unauthorized Personnel Keep Out" and "Hazardous Waste Storage Area".
  - c. Signs shall be in both English and Spanish.
  - d. Signs on approachable perimeter fences shall be spaced no more than 50 feet apart.

**CONTAINER MANAGEMENT  
PERMIT ATTACHMENT F  
NM0890010515-1**

## ATTACHMENT F CONTAINER MANAGEMENT

### F.1 CONTAINER PACKAGING, SAMPLING and LABELING

#### F.1.1 Container Packaging and Transport

When chemical substances are declared to be in excess, the originating group completes Waste Profile Form (WPF, see Permit Attachments A.2 and A.3) and sends the form to the Solid Waste Operations Group (FWO-SWO). The WPF provides waste characterization information for subsequent management of material. The WPF is reviewed for adequacy of information and assignment of segregation codes, Department of Transportation information, and Environmental Protection Agency (EPA) Hazardous Waste Numbers. When the WPF is approved, the waste generator submits a Chemical Waste Disposal Request (CWDR) to FWO-SWO. The CWDR lists the chemical waste the generating group needs to dispose of, the quantity of the wastes, and other pertinent information about the containers.

A uniform waste manifest is prepared for use when the waste is collected, packaged, and transported. All waste materials are packaged and transferred in accordance with DOT regulations and the Laboratory's On-Site Transportation Manual.

FWO-SWO personnel review the waste disposal request for adequacy of information and assignment of segregation codes, DOT information, and EPA codes. FWO-SWO personnel then use the waste disposal request to complete the shipping papers for waste collection. Also, FWO-SWO use the waste disposal request to create a second record as part of the Hazardous Waste Database. FWO-SWO personnel visit the generating site to package the waste and transport it to TA-54, Area L. All waste is transferred in accordance with DOT regulations and Laboratory procedures.

Containers will be visually inspected for integrity before transport. If the container is unacceptable, it will be repackaged or overpacked prior to transport. The wastes are transported by vehicles ranging from half-ton to trucks to semitrailers with maximum capacities of up to 80,000 pounds.

Upon arrival at a hazardous or mixed waste management unit, the wastes are unloaded from the transport vehicle and placed into appropriate storage areas. Lab pack waste will be temporary placed at the packaging building for labeling or compositing. Drums and Tuff-Tanks will be placed on either the sampling pad or storage pad for sampling and labeling.

#### F.1.2 Drum Labeling, Recording, and Sampling System

Each unique package of waste is labeled with the following information:

- chemical segregation group number
- unique record number
- date of generation
- either an EPA hazardous waste label or the words “hazardous waste.”

- DOT Hazard class and shipping information, as appropriate
- EPA hazardous waste code(s) or the hazardous constituent(s)

This information and the data from the CWDR are entered into a chemical and mixed waste database. All records are then maintained in accordance with the requirements of this permit.

Sampling of the waste is then performed as outlined in Permit Attachment A. The sampling pad at TA-54, Area L, is restricted to one compatibility group of chemicals at a time (e.g., organics). The group allowed at the time will be posted on the pad. This ensures that incompatible chemicals do not react in the containment basin of the pad. Before a new compatibility group of chemicals is placed on the pad, the containment area will be cleaned. For this reason, the main sampling pad will generally be used for organic waste and acid/base waste will be sampled at the appropriate storage cell.

After all packages are labeled and/or sampled, they are moved to one of the Laboratory's storage areas. The permitted areas are defined in Permit Module III.

## F.2 STORAGE AREA PRACTICES

### F.2.1 Storage Areas at TA-50 and TA-54

The Laboratory has the following storage areas that are the subject of this permit: modular storage units and the main storage pad at TA-54, Area L; the modular storage unit at TA-50, the storage room; the TA-50-69 indoor and outdoor storage units; and the TA-54-38 storage units; and TA-54-226, -229, -230, -231, -232, and Pad 10 at TA-54, Area G. The usage of each of these units is discussed below.

#### F.2.1.1 Modular Storage Units, TA-54, Area L (TA-54-68 and -69 and -70)

The primary usage of the modular units will be for the storage of lab pack waste, particularly those in fiberboard containers. After labeling, the lab packs are placed directly in the appropriate storage cell. Each modular unit has two or three cells allowing single chemical family group to be stored in each cell at any one time. However, more than one cell may be used for the same chemical type. Each cell will be labeled as to the chemical family stored there. If at any time the cell designation changes, such as from organic to reactive, the cell will first be cleaned to ensure that no hazardous waste constituent residues remain that would create an incompatibility problem during a spill.

#### F.2.1.2 Storage Pad at TA-54, Area L (TA-54-32)

Material stored on the storage pad at TA-54, Area L, will generally be placed there after labeling and sampling. This may not be the case for acids and bases where the storage cell is also used as the sampling pad. The pad is divided into six cells allowing the storage of six chemical family groups. However, more than one cell may be used for the same chemical type. All cells will be labeled as to which chemical type is stored there. If at any time it is necessary to change the designation of a cell, it will first be cleaned to remove any residues that might produce an unfavorable reaction with the new chemical type.

#### F.2.1.3 Modular Storage Unit at TA-50 (TA-50-114)

The modular storage units at TA-50 will be used primarily to store acid and base wastes. Each cell will be labeled acid or base to indicate the type of waste stored there. If at any time the designation of a cell needs to be changed, the cell will first be cleaned to ensure that incompatible residues have been removed.

#### F.2.1.5 Storage Room at TA-50-37, Room 117

The storage room at TA-50-37 is divided into two areas, one for solids and one for liquids. The liquid side is further divided into two cells. Therefore, up to three chemical types may be stored at any one time. Cells will be labeled as to the chemical type stored there. If at any time the cell designation needs to be changed, the cell will be cleaned to remove any incompatible residues.

#### F.2.1.6 Storage Pads at TA-54, Area L (TA-54-36 and -58)

The primary activities at TA-54-36 and TA-54-58 will fall into two categories. The first is sorting, surveying, and decontaminating certain waste currently in storage and labeled "suspect mixed waste." All of the waste found to contain no radioactive component will be repackaged, shipped off-site, and disposed of at a permitted Hazardous Waste Treatment, Storage and Disposal Facility.

The second is typically associated with hazardous and mixed waste streams for which commercial treatment and/or disposal is currently available. These waste streams will be staged, inspected, sampled, and analyzed to provide complete hazardous waste and radiological characterization. When these steps are completed, the waste streams will be profiled into the commercial facilities and shipped for ultimate treatment and/or disposal.

The activities at pads #58 and #36 consist of opening the drums, surveying the contents for radiological content, decontaminating the material as warranted, repackaging the material for either return to storage, shipment off-site for disposal, or disposal as low level waste at TA-54, Area G.

Pads #58 and #36 consist of two cement pads that are sloped toward a dry containment sump at the centerline of the rear wall to facilitate pumping of any captured liquids. The walls encircling the pads vary from approximately 4 inches in height at the drive over entrance to the pad to approximately eleven and one-half inches in height at the edge of the dry sump. The "dry sump" in each pad is to provide secondary containment only, has no discharge and must be pumped in the event any liquid is captured. The pads are coated with an impermeable epoxy coating and are covered by a single, metal "pole barn."

Pad #36 has a temporary modular containment structure constructed over it. This structure provides containment and protection for the sampling and repackaging activities. The sides of the structure have been equipped with slanted sheets of plywood to direct the snow and rain away from the secondary containment. The modular containment structure is secured to the beams supporting the "pole barn" with guy wires. Whenever this temporary structure is removed from Pad #36, it will

be decontaminated according to the procedures of Permit Attachment E.3, E.3.3 and E.3.4: Closure Procedures and Decontamination and Decontamination Verification.

#### F.2.1.6 TA-54, Area G, Container Storage Areas (TA-54-226, -229, -230, -231, -232, and Pad 10)

The container storage areas (CSA) at TA-54, Area G (TA-54-226, -229, -230, -231, and -232) will be used for the storage of waste containers, including drums and fiberglass-reinforced plywood (FRP) boxes, will be segregated by LANL waste code prior to being placed in a storage dome. If any containers require overpacking or repackaging, the overpack or repackaging container will be labeled with barcodes that identify the original waste container. In the modular units at Storage Pad 10, waste containers will be stored along the length of the walls of the storage units allowing a center aisle for inspection and passage of emergency equipment. Drums will not be stacked within the modular units. None of the wastes to be placed in the storage domes will be incompatible wastes and no wastes will be placed in containers that previously held incompatible wastes. TA-54-230 and Storage Pad 10 will be used to store drums and FRP crates that potentially contain liquids. The remaining CSAs will store only solid waste.

#### F.2.1.7 TA-50-69 Indoor and Outdoor Container Storage Areas

The indoor and outdoor storage areas associated with TA-50-69 are used for storage of TRU mixed waste, low-level mixed waste, and hazardous waste. Potentially incompatible wastes will be segregated on self-containment pallets at both the indoor and outdoor storage areas. Potential liquid-bearing waste containers will be stored on self-containment pallets at both the indoor and outdoor storage areas.

#### F.2.1.8 TA-54-38 Container Storage Areas

The four container storage areas at TA-54-38 are used for storage of TRU mixed waste and low-level mixed waste. Potentially incompatible wastes will be segregated on self-containment pallets at each storage area. Potential liquid-bearing waste containers will be stored on self-containment pallets at each storage area.

#### F.2.2 General Container Management Practices

All hazardous recyclable materials are stored as hazardous waste until such time as they are recycled. They are placed in the same segregated storage areas as the other waste.

Any bulging drums are handled in accordance with accepted practice and Laboratory procedures. Generally this means that personnel will follow such practices as slowly venting the drum as it is being opened and personnel wearing protective clothing and splash guards.

Any spills resulting from the transfer/storage of waste will be cleaned up in accordance with Attachment D.

Inspections will be conducted and aisle space will be maintained in accordance with Permit Attachment B.

Off-site shipments of waste will occur at either the given storage area directly or from the transport pad at TA-54, Area L. This will avoid unnecessary transport on Pajarito Road.

Repackaging of waste will generally occur adjacent to the storage area the waste was removed from. Other possible areas include the TA-54, Area L, sampling pad (TA-54-36), and transport pad (TA-54-58); and the

be decontaminated according to the procedures of Permit Attachment E.3, E.3.3 and E.3.4: Closure Procedures and Decontamination and Decontamination Verification.

#### F.2.1.6 TA-54, Area G, Container Storage Areas (TA-54-226, -229, -230, -231, -232, and Pad 10)

The container storage areas (CSA) at TA-54, Area G (TA-54-226, -229, -230, -231, and -232) will be used for the storage of ~~transuranic (TRU) mixed waste containers retrieved from under earthen cover at Pad 1 (TA-54-226) and Pads 2 and 4. The~~ waste containers, including drums and fiberglass-reinforced plywood (FRP) boxes, will be segregated by LANL waste code prior to being placed in a storage dome. If any ~~of the retrieved~~ containers require overpacking or repackaging, the overpack or repackaging container will be labeled with barcodes that identify the original waste container. In the modular units at Storage Pad 10, waste containers will be stored along the length of the walls of the storage units allowing a center aisle for inspection and passage of emergency equipment. Drums will not be stacked within the modular units. None of the wastes to be placed in the storage domes will be ~~ignitable or reactive,~~ incompatible wastes ~~will be mixed,~~ and no wastes will be placed in containers that previously held incompatible wastes. TA-54-230 and Storage Pad 10 will be used to store drums and FRP crates that potentially contain liquids. The remaining CSAs will store only solid ~~TRU mixed~~ waste.

#### F.2.1.7 TA-50-69 Indoor and Outdoor Container Storage Areas

The indoor and outdoor storage areas associated with TA-50-69 are used for storage of TRU mixed waste, low-level mixed waste, and hazardous waste. Potentially incompatible wastes will be segregated on self-containment pallets at both the indoor and outdoor storage areas. Potential liquid-bearing waste containers will be stored on self-containment pallets at both the indoor and outdoor storage areas.

#### F.2.1.8 TA-54-38 Container Storage Areas

The four container storage areas at TA-54-38 are used for storage of TRU mixed waste and low-level mixed waste. Potentially incompatible wastes will be segregated on self-containment pallets at each storage area. Potential liquid-bearing waste containers will be stored on self-containment pallets at each storage area.

#### F.2.2 General Container Management Practices

All hazardous recyclable materials are stored as hazardous waste until such time as they are recycled. They are placed in the same segregated storage areas as the other waste.

Any bulging drums are handled in accordance with accepted practice and Laboratory procedures. Generally this means that personnel will follow such practices as slowly venting the drum as it is being opened and personnel wearing protective clothing and splash guards.

Any spills resulting from the transfer/storage of waste will be cleaned up in accordance with Attachment D.

Inspections will be conducted and aisle space will be maintained in accordance with Permit Attachment B.

Off-site shipments of waste will occur at either the given storage area directly or from the transport pad at TA-54, Area L. This will avoid unnecessary transport on Pajarito Road.

TA-50-69 indoor storage area. Repackaging can range from overpacking a leaking container to off-site contractors repackaging the lab pack waste to meet incinerator specifications.

Permit Module III provides additional requirements all container storage areas.

EPA I.D. Number (enter from Page 1) <b>NM0890010515</b>	Secondary ID Number (enter from Page 1) <div style="text-align: center;"> <input type="text"/> </div>
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XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA Hazardous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes			
				(1) Process Codes (enter)	(2) Process Description (If a code is not entered in D[1])		
<b>Technical Area (TA) 54-226, -229, -230, -231, and -232</b>							
1	F001	1,301	P	S01			
2	F002						
3	THIS LINE INTENTIONALLY LEFT BLANK						
4	D007	406,940	P	S01			
5	D008						
6	THIS LINE INTENTIONALLY LEFT BLANK						
7	D006	311,765	P	S01			
8	D007						
9	D008						
10	THIS LINE INTENTIONALLY LEFT BLANK						
11	D001	101,995	P	S01			
12	THIS LINE INTENTIONALLY LEFT BLANK						
13	D003	71,062	P	S01			
14	THIS LINE INTENTIONALLY LEFT BLANK						
15	D008	96,700	P	S01			
16	THIS LINE INTENTIONALLY LEFT BLANK						
17	D008	190,691	P	S01			
18	THIS LINE INTENTIONALLY LEFT BLANK						
19	D008	434,743	P	S01			
20	THIS LINE INTENTIONALLY LEFT BLANK						
21	D004	2,413,802	P	S01			
22	D007						
23	D008						
24	D011						
25	F001						
26	F002						
27	F003						
28	F005						
29	THIS LINE INTENTIONALLY LEFT BLANK						

EPA I.D. Number (enter from Page 1) <b>NM0890010515</b>	Secondary ID Number (enter from Page 1) <div style="text-align: center;"> <input type="text"/> </div>
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XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA Hazardous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes			
				(1) Process Codes (enter)		(2) Process Description (If a code is not entered in D[1])	
<b>Technical Area (TA) 54-226, -229, -230, -231, and -232</b>							
1	F001	1,301	P	S01			<del>Transuranic Mixed Waste (TRUMW); A15</del>
2	F002						
3	THIS LINE INTENTIONALLY LEFT BLANK						
4	D007	406,940	P	S01			<del>TRUMW; A25</del>
5	D008						
6	THIS LINE INTENTIONALLY LEFT BLANK						
7	D006	311,765	P	S01			<del>TRUMW; A26</del>
8	D007						
9	D008						
10	THIS LINE INTENTIONALLY LEFT BLANK						
11	D001	101,995	P	S01			<del>TRUMW; A27</del>
12	THIS LINE INTENTIONALLY LEFT BLANK						
13	D003	71,062	P	S01			<del>TRUMW; A28</del>
14	THIS LINE INTENTIONALLY LEFT BLANK						
15	D008	96,700	P	S01			<del>TRUMW; A30</del>
16	THIS LINE INTENTIONALLY LEFT BLANK						
17	D008	190,691	P	S01			<del>TRUMW; A31</del>
18	THIS LINE INTENTIONALLY LEFT BLANK						
19	D008	434,743	P	S01			<del>TRUMW; A61</del>
20	THIS LINE INTENTIONALLY LEFT BLANK						
21	D004	2,413,802	P	S01			<del>TRUMW; A75</del>
22	D007						
23	D008						
24	D011						
25	F001						
26	F002						
27	F003						
28	F005						

EPA I.D. Number (enter from Page 1) <b>NM0890010515</b>	Secondary ID Number (enter from Page 1) <div style="text-align: center; margin-top: 10px;"> <input type="text"/> </div>
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XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA Hazardous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes			
				(1) Process Codes (enter)		(2) Process Description (If a code is not entered in D[1])	
30	D007	313,787	P	S01			
31	F001						
32	F002						
33	F005						

EPA I.D. Number (enter from Page 1) <b>NM0890010515</b>	Secondary ID Number (enter from Page 1) <div style="text-align: center;"> <input type="text"/> </div>
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XIV. Description of Hazardous Wastes (Continued)

Line Number	A. EPA Hazardous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes			
				(1) Process Codes (enter)		(2) Process Description (If a code is not entered in D[1])	
29	THIS LINE INTENTIONALLY LEFT BLANK						
30	D007	313,787	P	S01			<del>TRUMW; A76</del>
31	F001						
32	F002						
33	F005						

### CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
**Kenneth M. Hargis**  
Division Director  
Environmental Stewardship Division  
Los Alamos National Laboratory

5/22/06  
Date Signed

  
\_\_\_\_\_  
**Edwin L. Wilmot**  
Manager, Los Alamos Site Office  
National Nuclear Security Administration  
U.S. Department of Energy  
Owner/Operator

5/30/04  
Date Signed