

CHANGES TO DRAFT PERMIT
OF MAY 1989

1. Changed all HWMR-5 references to "HWMR-5, as amended 1989" and added "40 CFR" to regulation citations.
2. Changed citations from 74-4-4.2 NMSA 1978 to "74-4-1 et. seq. NMSA 1978.
3. All numbers over 10 are no longer spelled out.
 - I.A. Revised to reflect TSDf requirement only by specifying which regulation parts and self-implementing regulations apply; cited more Sections from RCRA and CERCLA.
 - I.D.2. Added citation to HWMR-5.
 - I.D.3. Expanded section and added citation to HWMR-5.
 - I.D.7. Added citation to HWMR-5.
 - I.D.9. Added section regarding records to be kept and citation to HWMR-5.
 - I.H.3. Expanded section on definition to include more Parts of HWMR-5, with relevant definitions.
 - II.C.2. Added requirement that a contract laboratory must be notified of quality assurance requirements.
 - II.E.1. Added requirement that modified inspection logsheets are to be kept citation to HWMR-5.
 - II.E.2.a. Added reference to Figure 9.
 - II.E.d. Added reference to Figure 10.
 - II.E.2.f. Added paragraph to address contingency of dry sample point.
 - II.F. Added requirement that training documents and records are to be kept and citations to HWMR-5.
 - II.K.1. Added regulation cite.
 - II.K.1.b. Added regulation cite.
 - II.K.1.g. Added "monitoring" records.
 - II.L.5. Added "structures and soils" to section.
 - II.N. Changed form for citing NMSA.



III.A.1.c. Corrected figure reference and added single layer limit.

III.A.1.d. Corrected typographical error.

III.A.1.e. Corrected figure reference.

III.A.1.f. Corrected figure reference.

III.A.2.b. Corrected figure reference.

III.A.2.c. Corrected figure reference.

III.A.3. Deleted paragraph.

III.A.4. Deleted paragraph.

III.B. Added subsection III.B.3. regarding land ban requirements.

III.H.3. Changed quarterly to weekly to coincide with inspection form.

IV.B. Added subsection IV.B.5. regarding land ban requirements.

IV.B.3. Changed last 40 CFR section to permit module.

IV.C.1. Added secondary containment description.

IV.C.2. Added secondary containment description.

IV.D.1. Added reference to Attachment H.

IV.D.1.c. (new) Added batch volume limitation to prevent overflow condition.

IV.D.1.d. (renumbered) Added reference to wastes excluded under HWMR-5, Part II, 40 CFR section 261.3.

IV.D.2.a. Added operational requirement to preclude overfilling.

IV.E.3. Changed quarterly to weekly to coincide with inspection form.

IV.H. Changed 40 CFR section to permit module.

V.A.1. Added reference to new figure 8.

V.A.3. Added the words "operating", "regarded as", "information justifying", and "or"; deleted the words "grounds for", "and may be grounds for", changed 40 CFR section 264. Subpart O to 40 CFR section 264.343.

- V.B.2.b. Changed them to it.
- V.C.1. Specified waste must be analyzed prior to incineration.
- V.C.2.d. Restricted waste to analyzed wastes.
- V.C.3. Added determination of radionuclides content.
- V.C.4. Added metal standards from incineration.
- V.E. Specified continuous monitoring.
- V.E.9. Added hydrocarbon monitoring.
- V.E.10. Added radioactivity monitoring.
- V.F.1. Specified each batch of waste must meet chlorine standard.
- V.F.4. Specified pressure monitoring on both HEPA filter banks in the exhaust system.
- V.F.5.d. Added requirement to maintain temperatures during waste burn.
- V.F.8. (new) Added total hydrocarbon standard in the exhaust system.
- V.F.9. (new) Added radioactivity standard in the exhaust system.
- V.F.10. Renumbered from V.F.8. to V.F.10.
- V.F.11. Renumbered from V.F.9. to V.F.11.
- V.G.1. Specified ash from listed waste burns be cemented and disposed of off site and ask from characteristic wastes, which test as still characteristic must also be commented.
- V.G.2. Defined filters in the ECS to include the carbon absorber.
- V.H.4. (new) Added requirement to test the automatic cutoff controls.
- V.I.4. Added requirement to log the tests of the automatic cutoff controls.
- V.I.5.b. Added requirement that DRE be reverified whenever new information requires further testing.
- VI.B. Added subsection VI.B.3. regarding land ban requirements.
- VI.J. Deleted underline-typographical error.

Figures 4 and 6 were revised.

Figures 7 through 10 were added.

Tables II-1 and II-2 were revised to add monitoring locations and parameters.

Permit Attachment A, paragraph A.5.1. was revised to increase verification analysis frequency and to clarify which wastes were subject to verification.

Permit Attachment B, paragraph B.1.3., B.2.3. and B.3.4. were revised to correct references to the inspection checklists.

Permit Attachment C was revised to delete Ralph Koenig and A. Torres.

Permit Attachment D was revised to add paragraph D.2.1.11 and throughout to change "Emergency Preparedness Office Deputy Officer" to "Laboratory Emergency Duty Officer."

Permit Attachment E.2., Table E.2.3. was revised to include the washwater before use in the sampling summary.

Permit Attachment E.3. paragraph E.3.3.2. page E.3-2. third paragraph was revised to distinguish actions for units emplaced over impervious surfaces from pervious surfaces. A typographical error was also corrected and Figures E.3.1. and E.3.2. were revised.

Permit Attachment E.4. paragraph E.4.1. was corrected to 8 cubic meters or 2200 gallons to include piping volumes. Paragraph E.4.8.3., page E.4-8. was corrected to delete an incorrect reference. Table E.4.1. was revised to reflect disassembly prior to decontamination and Figure E.4.1. was updated.

Permit Attachment E.5., Figure E.5.1. was updated.

Permit Attachment E.6., Figure E.6.1. was updated.

Permit Attachment E.7., Figures E.7.1. and E.7.2. were updated.

Permit Attachment E.8., Table E.8.3. was revised to accurately reflect the narrative in paragraph E.8.5. Figure E.8.1. was updated.

Permit Attachment E.9., paragraph E.9.4. was revised to reflect when areas within and outside the perimeter fence must be sampled. Figure E.9.1. was updated.

Permit Attachment G was revised to reflect quantities as identified in DOE letter of August 18, 1989.

Permit Attachment I was revised include a definition of "investigate".

Permit Attachment J was revised to delete requirements for health physics trained people support.

Permit Attachment K was updated to provide the regulations in effect at the time the permit was signed.