CLOSURE PLAN
PERMIT ATTACHMENT E.3
NM 0890010515-1

E.3. Modular Storage Units

Some containerized wastes are stored in prefabricated modular storage buildings at various locations in TA-50 and TA-54, Area L. See Figures E.3.1 and E.3.2. These storage units are self-contained and are equipped with chemical resistant walls to provide separation of incompatible wastes, a corrosion resistant fiberglass floor grating, and a polypropylene building sump liner.

E.3.1. Estimate of Maximum Waste in Storage

Each storage unit can store a maximum of thirty (30) 55 gallons drums. ~~or a~~ The ~~total~~ maximum waste in storage ~~of~~ shall not exceed 1650 gallons of liquid wastes.

E.3.2. Description of Waste Handled

Three waste streams compose the bulk of the waste stored in the modular units at TA-50, although the system is flexible enough to allow storage of other wastes that may be generated through new Laboratory projects. These streams are an acid/base waste that contains copper, chromate plating waste, and waste cyanide plating solutions. These structures may also be used to store any regulated waste while awaiting lab-packing.

The modular units at TA-54, Area L (TA-54-68 and -69) will be used primarily for the storage of labpacked waste. Since six separate cells are available for storage, there may be up to six different categories of waste stored there while waiting treatment or disposal.

The modular unit at TA-54, Area L (TA-54-36) will be used primarily for:

(1) sorting, surveying, and decontaminating certain wastes currently in storage and labeled "suspect mixed waste.", and;

(2) staging, inspecting, sampling, and analyzing specific mixed waste streams for which commercial treatment and/or disposal is currently available.

E.3.3. Closure Procedures and Decontamination

E.3.3.1. Partial Closure

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~~ structures, Facility ~~Number~~ Numbers 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 fenceline 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 54-36, 54-68, ~~and~~ 54-69, and 54-70 for container storage located as shown in Figure 6.

F.2.1.4 Storage Pads at TA-50 (TA-50-139 and -140)

Two large storage pads will be located at TA-50. Each pad will have six divisions capable of storing six types of chemicals. Multiple cells may be used for the same chemical type. Each cell will be labeled to indicate the type of chemical stored there. If a cell designation needs to be changed, the cell will first be cleaned to remove any residues that might result in an incompatibility problem. All waste stored at this location will have been labeled and sampled at TA-54, Area L.

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. Generally, only waste that is already approved for onsite incineration will be stored there. This means the waste has not only been sampled and labeled but also analyzed per Permit Attachment A. However, if the need should arise, the area will be used for compatible waste for which analytical results are pending. All labeling and sampling will have occurred at TA-54, Area L. The primary chemical type stored here will be organic waste. If small quantities of other waste types, such as oxidizers, are to be incinerated, it will generally be delivered the day of the burn to avoid storage in this room.

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 wastes 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 directed at specific mixed waste streams for which commercial treatment and/or disposal is currently

available. These mixed waste streams will be staged, inspected, sampled, and analyzed to provide complete hazardous waste and radiological characterization. When these steps are completed, the mixed 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 a 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.2.2 General Container Management Practices

All 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 such practices as slowly venting the drum as it is