

TA 50



Department of Energy

Albuquerque Operations Office
Los Alamos Area Office
Los Alamos, New Mexico 87544

DEC 21 1995

Benito Garcia, Bureau Chief
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Building A
P.O. Box 26110
Santa Fe, New Mexico 87505

Dear Mr. Garcia:

Subject: Class 2 Resource Conservation and Recovery Act (RCRA) Hazardous Waste Facility Permit Modification; Technical Area (TA) 50-1, TA-50-69, TA-54-38 Waste Characterization Storage Areas

The purpose of this letter is to request a classification determination for a permit modification and submit proposed permit revisions for container storage areas at the Los Alamos National Laboratory (LANL) Decontamination Facility, TA-50, Building 1; the Waste Characterization, Reduction, and Repackaging Facility (WCRRF), TA-50, Building 69; and the Radioassay and Nondestructive Testing (RANT) Facility, TA-54, Building 38. The proposed revisions will modify the RCRA Hazardous Waste Facility Permit issued to the Department of Energy (DOE) and the University of California (UC) for LANL by the New Mexico Environmental Improvement Division (now the New Mexico Environment Department [NMED]) on November 8, 1989. LANL's Hazardous Waste Facility Permit and United States Environmental Protection Agency identification numbers are NM0890010515-1 and NM0890010515, respectively.

The suggested permit revisions were prepared in accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20 NMAC 4.1), as revised November 1, 1995, Subpart IX. If approved as permit modifications, the revisions will enable LANL to stage hazardous and/or mixed waste at nine container storage areas in support of waste management activities including waste characterization, waste segregation, lead shielding removal, and recycling that do not require RCRA permitting. The characterization activities will be used initially to support the requirements of the December 10, 1993 Consent Agreement between NMED, DOE and UC. The Consent Agreement resolved the New Mexico Hazardous Waste Act Compliance Order 93-03 regarding a remedial action plan for placing mixed waste currently stored at LANL TA-54, Area G, into storage complying with the Act. Proposed time frames for this characterization are contained in the waste characterization schedule submitted to NMED on March 30, 1995, as required by the Conditional Approval of RCRA Hazardous Waste Permit Modifications Notice from NMED of May 11, 1994.

Container storage is requested for the TA-50, Building 1, Decontamination Facility, Rooms 35, 36 and 38/38A Container Storage Areas; the TA-50, Building 69, WCRRF



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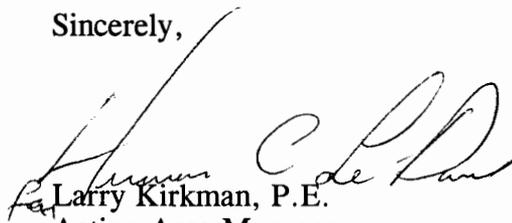
Indoor and Outdoor Container Storage Areas; and the TA-54 West, Building 38, RANT High Bay, Low Bay, Loading Dock, and Outdoor Container Storage Areas. Specific information regarding these container storage areas was provided to your office as a RCRA Permit Modification Request, Final Draft, on November 1, 1995.

As discussed in our permitting issues meeting of October 27, 1995, LANL is requesting a Class 2 permit modification. The modification is needed to provide LANL with temporary staging areas to facilitate the waste management activities described above in a manner that is protective of human health and the environment. The modification is not intended to provide additional capacity for prolonged storage of these waste streams. The waste containers to be staged at these facilities will be transported from generator and storage areas and will be subsequently managed at other LANL sites, as appropriate, after undergoing the management activities described. The currently stored and potential future waste streams to be staged at these facilities will not require different container management practices than those authorized in the LANL Hazardous Waste Management Facility Permit, the permit modifications for Storage Pads 1, 2, and 4; and Storage Domes A-D, Technical Area G, as approved by the Hazardous and Radioactive Materials Bureau, June 3, 1994, or as described in the Transuranic Mixed Waste Analysis Plan, submitted to NMED, March 30, 1995, revising the permit modifications for the Area G storage pads and domes.

Upon receiving your determination of the permit modification class, LANL will formally request the enclosed permit modifications. Additionally, LANL will send notification of this request to those interested parties on the facility mailing list as required by 20 NMAC 4.1, revised November 1, 1995, 270.42(b)(2).

Thank you in advance for your consideration of this issue. We hope that the enclosed information will continue to support a timely review of the permit modification package. If you have any further questions, please contact Jody Plum, Office of Environment and Projects, at (505) 665-5042.

Sincerely,


Larry Kirkman, P.E.
Acting Area Manager

LAAMEP:7HJP-007

Enclosures

cc w/enclosures:

B. Hoditschek

Hazardous and Radioactive Materials Bureau

NMED

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bcc w/enclosures:

J. Plum, AAMEP, LAAO

bcc w/o enclosures:

J. Ellvinger, ESH-19, LANL, MS-K498

G. Bachigalupa, ESH-19, LANL, MS-K498

PERMIT REVISION SUMMARY

The purpose of this attachment is to summarize suggested permit revisions to the Los Alamos National Laboratory (LANL) Resource Conservation and Recovery Act (RCRA) Hazardous Waste Facility Permit issued to the Department of Energy and the University of California for LANL by the New Mexico Environmental Improvement Division (now the New Mexico Environment Department [NMED]) on November 8, 1989. The permit revisions involve changes associated with nine new or existing hazardous and/or mixed waste container storage areas for the temporary staging of wastes during management activities that do not require RCRA permitting. These activities include waste characterization by radioassay, visual characterization and drum coring techniques. Waste segregation, lead shielding removal, and recycling are also included. The permit revisions contain additional sections or updated language where operational changes have occurred in LANL procedure since the original permit was issued that are significant to this permit modification request.

Container storage is requested for the TA-50, Building 1, Decontamination Facility, Rooms 35, 36 and 38/38A Container Storage Areas; the TA-50, Building 69, WCRRF Indoor and Outdoor Container Storage Areas; and the TA-54 West, Building 38, RANT High Bay, Low Bay, Loading Dock, and Outdoor Container Storage Areas. Specific information regarding these container storage areas was provided to NMED as a RCRA Permit Modification Request, Final Draft, on November 1, 1995.

The suggested permit revisions have been limited to those sections of the permit directly affected by the request for the container storage areas. It is anticipated that other overall changes to the permit will be made during future scheduled permit modifications or the permit renewal process for 1999.

The revisions occur in one permit module, the existing facility figure section, and in seven permit attachments. The permit module affected is Module III, "Storage in Containers." The seven permit attachments include Permit Attachment A "Waste Analysis Plan," Permit Attachment B "Inspection Plan," Permit Attachment C "Personnel Training," Permit Attachment D "Contingency Plan," Permit Attachment E "Closure Plan," Permit Attachment F "Container Management," and Permit Attachment G "Authorized Wastes." Revisions to these sections were based upon the newest electronic version of the permit currently being approved by the Hazardous and Radioactive Materials Bureau (HRMB), NMED. Changes to the existing permit language have been highlighted in the "redline/strikeout" format. Summaries of the proposed revisions to each section follow. A listing of the specific changes to each section are included in the enclosed Table, "Proposed Hazardous Waste Facility Modified Permit Summary for Container Storage Areas at TA-50-1, TA-50-69, and TA-54-38."

Permit Module III "Storage Containers" has been revised to include the additional permitted container storage areas requested, update regulatory citations, and include the relevant waste quantities. Two new subsections have been added to Section III.A "Designated Storage Units," to include the new areas at TA-50 and TA-54. Mixed waste references and regulatory citations for the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20 NMAC 4.1), as revised November 1, 1995, have been added to the remaining sections of the permit module where appropriate. Three new items describing the storage capacity of the requested areas have been added to Section II.C.3 "Quantity."

Three new facility drawings have been included to show the container storage area locations at TA-50 and TA-54 West. These are added to the existing figure drawings at the end of the permit module sections of the current permit.

Permit Attachment A "Waste Analysis Plan" has been revised with the addition of two new sections describing waste characterization of transuranic (TRU) mixed waste and low-level solid mixed waste. The TRU mixed waste analysis plan is the same as that submitted to NMED, March 31, 1995. The attachment has also been reformatted as Attachments A.1, A.2, and A.3 pursuant to guidance from HRMB, October 27, 1995.

Various sections of Permit Attachment B "Inspection Plan" have been modified to include new information regarding communication and alarm equipment for the proposed storage areas and updated regulatory citations. A new version of the "Hazardous and Mixed Waste Facility Inspection Form" and instructions currently used at LANL have been added to the end of the attachment.

Permit Attachment C "Training Plan" has been completely replaced due to extensive revisions to the facility training procedures since the original permit was issued. Permit Attachment D "Contingency Plan" has also been replaced with the exception of language regarding implementation guidelines and emergency process shutdown of facility incinerators. These replacements have been submitted previously in the TA-54, Area G, Storage Pads 1, 2, and 4, and Storage Domes A-D, RCRA Part B Permit Application Request of September 30, 1993, and the TA-16, Container Storage Areas and Open Burn Units, RCRA Part B Permit Application of June 30, 1995. Tables D-6 and emergency equipment tables from the existing permit have also been retained. Three new closure plans for the proposed container storage areas have been added to Permit Attachment E "Closure Plan."

Permit Attachment F "Container Management" has been revised to include descriptions of the proposed container storage areas and new language has been added to reflect changes in LANL waste container transport and management practices. Extensive language changes are proposed for Section F.1 "Container Packaging, Sampling, and Labeling" to update LANL procedures for waste characterization and transport documentation. Section F.2.1 "Specific Storage Areas" has been modified to include three new subsections for the proposed container storage areas with waste storage descriptions consistent with existing permit language. Section F.2.2 "General Container

Management Practices” has been modified to incorporate the waste repackaging areas discussed in this permit modification and to add an aisle spacing cross reference.

Tables have been added to Permit Attachment G “Authorized Wastes” to incorporate the EPA Hazardous Waste numbers, estimated annual quantities, and process codes associated with these container storage areas. The tables were originally provided on November 1, 1995, with the RCRA Permit Modification Request, Final Draft, as the Technical Area 50 and Technical Area 54 West RCRA Part A Permit Application, Item XIV, “Description of Hazardous Wastes.” The format is suggested by the original permit.