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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Barbara Hoditschek, Program Manager
RCRA Permitting Program
Hazardous and Radioactive Materials Bureau
New Mexico Environment Department
2044 Galisteo St., Bldg. A
P. O. Box 26110
Santa Fe, NM 87505



Dear Ms. Hoditschek:

Subject: Request for Information: Technical Area (TA) 54, TA-50 Proposed Hazardous Waste Facility Permit Modification

This letter is in response to your request of March 11, 1996, regarding further information on the Resource Conservation and Recovery Act (RCRA) permit modification request submitted to the Hazardous and Radioactive Materials Bureau (HRMB) on December 22, 1995. The document was titled "*Proposed Hazardous Waste Facility Permit Modification, Technical Area 50, Building 1; Rooms 35, 36, and 38/38A Container Storage Areas, Building 69; Indoor and Outdoor Container Storage Areas, Technical Area 54 West, Building 38; High Bay, Low Bay, Loading Dock, and Outdoor Container Storage Areas*" (RANT/WCRRF/DF Permit Modification Proposal). The submitted document represents proposed text to revise the existing Los Alamos National Laboratory Hazardous Waste Facility Permit for these facilities. The document is supplemented by the draft RCRA Part B Permit Application for these facilities (RANT/WCRRF/DF Part B) submitted September 29, 1995.

To our understanding, you have asked for a discussion of the potential similarities between sections of this permit modification package containing the documents referenced above and the RCRA Part B Permit Application for the Transuranic Waste Inspectable Storage Project (TWISP Part B) submitted to HRMB in September 1993. This was to assist your review by noting similar sections previously approved for TWISP. In addition, you asked for a discussion of the differences between the waste analysis plan for mixed transuranic radioactive waste and that for mixed low-level radioactive waste contained in the RANT/WCRRF/DF Permit Modification Proposal.



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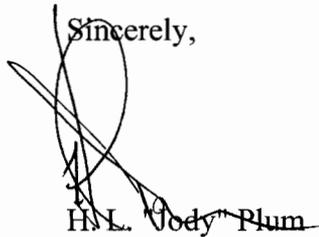
Barbara Hoditschek

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Attachment A (enclosed) itemizes the similarities between the 1993 TWISP Part B and the 1995 WCRRF/RANT/DF Part B. Attachment B (enclosed) lists the similarities anticipated in the proposed permit language revisions as presented in the TWISP Permit Modification Proposal and the RANT/WCRRF/DF Permit Modification Proposal. This is included to show where different or additional language would potentially need to appear in the existing facility permit. Attachment C (enclosed) attempts to show the differences between the transuranic mixed waste analysis plan and the low-level solid mixed waste analysis plan.

Thank you in advance for your consideration of these issues. As you are aware, any effort to hasten the review of the RANT/WCRRF/DF Permit Modification Proposal will help us meet budgetary and compliance commitments related to this project. If you have any further questions, please contact me at (505) 665-5042.

Sincerely,

A handwritten signature in black ink, appearing to read "H.L. Vody", written over a horizontal line.

H.L. Vody, Plum

Office of Environment and Projects

LAAMEP:7HJP-020

Enclosures

cc w/enclosures:

S. Zappe

Hazardous and Radioactive Materials Bureau

New Mexico Environment Department

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Santa Fe, NM 87505

Attachment A

Similarities between RCRA Part B Permit Applications

TWISP Part B, September, 1993	Draft RANT/WCRRF /DF Part B, October, 1995	Discussion
General	General	<p>The Part B sections discussed below are similar but global updates have been included since 1993:</p> <ul style="list-style-type: none"> •Regulatory citations have been changed to reflect the revision from Hazardous Waste Management Regulation (HWMR-7) to New Mexico Administrative Code (20 NMAC 4.1). •LANL organization references have been updated to reflect reorganization changes (e.g., EM-7 to CST-5).
Section 2	Section 2	<p><i>Facility Description</i> The two facility descriptions share common text regarding geology (Section 2.2.4) and groundwater (Section 2.2.5).</p>
Section 6	Section 6	<p><i>Inspections</i> These sections are similar with some text changes:</p> <ul style="list-style-type: none"> •Section 6.3 "Inspection Schedule and Requirements for Tanks" has been deleted in the 1995 draft Part B.* •Attachment 6.1 "Inspection Record Form" is the same except for addition of Item 23 (aisle space inspection requirement) and expanded sign-off section.
Section 7	Section 7	<p><i>Contingency Plan</i> These sections are similar with organizational, methods, and equipment updates:</p> <ul style="list-style-type: none"> •Section 7.1.3 - LANL organizational updates •Section 7.4.1 - tank specific language deleted* •Section 7.9.2 - site specific figure references •Table 7-1 - LANL organizational updates •Table 7-3 - methods updated •Table 7-4 - group references and footnotes updated •Figures - site specific •Attachment 7.1 - site specific equipment updates
Section 8	Section 8	<p><i>Personnel Training</i> These sections are similar with some text changes:</p> <ul style="list-style-type: none"> •Attachment 8.1 "Los Alamos National Laboratory Training Program": - the inspector/operations engineer category was dropped and footnotes edited.
Section 9	Section 9	<p><i>Closure Plans</i> Sections 9.1, 9.5, 9.8 and 9.9 are the same. Other sections are waste management unit specific</p>
Section 11	Section 11	<p><i>Other Federal Laws</i> No change.</p>
Appendix A	Appendix A	<p>"Determination of 100-Year Floodplain Elevations at Los Alamos National Laboratory" - No change</p>
Appendix B	Appendix B	<p>"1991 and 1992 Traffic Studies at Intersection of Diamond Drive and Trinity Drive" - No change</p>

* Tank requirements in the TWISP Part B were related to the proposed TA-63 Hazardous Waste Treatment Facility; not TWISP.

Attachment B

Similarities between Proposed Hazardous Waste Facility Permit Modifications

RANT/WCRRF /DF Proposal, December 22, 1995	TWISP Proposal, January 31, 1996	Discussion
Module III	Module III	<p><i>Storage in Containers</i> Organization and regulatory citation changes are similar with the addition of site specific items:</p> <ul style="list-style-type: none"> •Section III.A - designated storage units are site specific •Section III.C.3.g and h - storage quantities are site specific
Attachment A	Attachment A	<p><i>Waste Analysis Plan</i></p> <ul style="list-style-type: none"> •Attachment A.2, "Transuranic Mixed Waste " is identical •Attachment A.3, "Low-Level Solid Mixed Waste" has been added to the RANT/DF/WCRRF Proposal
Attachment B	Attachment B	<p><i>Inspection Plan</i> Similar revisions with site specific additions:</p> <ul style="list-style-type: none"> •Section B.6, Aisle space requirements references are site specific •Sections B.7, B.8, and B.9 are site specific
Attachment C	Attachment C	<p><i>Personnel Training</i></p> <ul style="list-style-type: none"> •Proposed revisions are identical
Attachment D	Attachment D	<p><i>Contingency Plan</i> Proposed revisions are similar with site specific additions:</p> <ul style="list-style-type: none"> •Appendix D-1 "Emergency Equipment", includes site specific emergency equipment lists on pages 45-47 (TWISP) and 45-50 (RANT/WCRRF/DF).
Attachment F	Attachment F	<p><i>Container Management</i> Proposed revisions are similar with site specific additions:</p> <ul style="list-style-type: none"> •Section F.2.1 - storage area references are site specific •Section F.2.1.6 (TWISP) and F.2.1.6-8 (RANT/WCRRF/DF) are site specific •Section F.2.2 - waste repackaging area references are site specific

Attachment C

Differences between Transuranic Mixed Waste and Low-Level Solid Mixed Waste Analysis Plans

TRU Mixed WAP	Low-Level Solid Mixed WAP	Discussion
Definitions	Definitions	The two documents share definitions for acceptable knowledge, heterogeneous waste, homogeneous waste, and process knowledge. Definitions for legacy, existing, and future mixed waste are also similar as used for transuranic and low-level mixed waste.
A.2.1	A.3.1	<p><i>Facility Description</i></p> <p>These sections provide different waste media and site specific descriptions of waste generating processes and activities, identification of wastes managed, and descriptions of applicable mixed waste management units.</p>
A.2.2	A.3.2	<p><i>Waste Parameters</i></p> <p>The different proposed analytical parameters and characterization methods to be used for the two waste media types are described.</p> <p><u>TRU mixed waste</u> will be characterized using an appropriate combination (Tables A.2-3 and 4) of:</p> <ul style="list-style-type: none"> •Acceptable knowledge •Real-time radiography •Visual Examination •Headspace gas sampling for volatile organics •Hazardous constituent sampling <p><u>Low-level solid mixed waste</u> will be characterized using an appropriate combination (Tables A.3-2 and 3) of:</p> <ul style="list-style-type: none"> •Acceptable knowledge •Hazardous constituent sampling
A.2.3	A.3.3	<p><i>Waste Characterization Procedures</i></p> <p>Explanatory sections for the use of the waste profile form system and acceptable knowledge are similar. The proposed characterization techniques to be used for the two different waste media types are different and are summarized below.</p> <p><u>TRU mixed waste</u> will be characterized with the following basic approach:</p> <p>Legacy homogeneous waste</p> <ul style="list-style-type: none"> •Acceptable knowledge •Hazardous waste constituent sampling and analysis (statistically selected subset of containers) •Headspace sampling for volatile organics (statistically selected subset of containers) •Real-time radiography •Visual examination (statistically selected subset of containers) <p>Legacy heterogeneous waste</p>

		<ul style="list-style-type: none"> •Acceptable knowledge •Headspace sampling for volatile organics (statistically selected subset of containers) •Real-time radiography •Visual examination (statistically selected subset of containers) <p>Existing (currently generated) homogeneous waste</p> <ul style="list-style-type: none"> •Acceptable knowledge and waste profile form (WPF) documentation •Additional analysis per legacy homogenous waste as capabilities are developed <p>Existing (currently generated) heterogeneous waste</p> <ul style="list-style-type: none"> •Acceptable knowledge and WPF documentation •Additional analysis per legacy heterogeneous waste as capabilities are developed <p>Future homogeneous waste</p> <ul style="list-style-type: none"> •Process certification and QA/QC program •Additional sampling and analysis when required <p>Future heterogeneous waste</p> <ul style="list-style-type: none"> •Process certification and QA/QC program •Additional sampling and analysis when required <p><u>Low-level solid mixed waste</u> will be characterized with the following basic approach:</p> <p>Legacy homogeneous waste</p> <ul style="list-style-type: none"> •Acceptable knowledge •Hazardous waste constituent sampling and analysis <p>Legacy heterogeneous waste</p> <ul style="list-style-type: none"> •Acceptable knowledge <p>Existing (currently generated) homogeneous and heterogeneous waste</p> <ul style="list-style-type: none"> •As above with WPF documentation <p>Future homogeneous and heterogeneous waste</p> <ul style="list-style-type: none"> •WPF, process certification and QA/QC program •Additional sampling and analysis when required
A.2.4	A.3.4	<i>Analytical Laboratory Selection and Analytical Procedures</i> These sections are similar.
A.2.5	A.3.5	<i>Waste Verification</i> The selection basis for verification is similar in these sections. Verification procedures are waste media specific and incorporate the methods described in the relevant Waste Characterization Procedures sections described above.
A.2.6	A.3.6	<i>Special Procedural Requirements</i> Discussions in these sections are different and waste media specific.

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- MATERIAL DISPOSAL UNITS:
- 54-31 PACKAGING BUILDING
 - 54-32 ROOFED WASTE STORAGE PAD
 - 54-35 TREATMENT PAD
 - 54-36 SAMPLING PAD
 - 54-37 OFFICE TRAILER
 - 54-39 PCB BUILDING
 - 54-43 SEPTIC HOLDING TANK
 - 54-44 PROPANE TANK
 - 54-46 EQUIPMENT STORAGE BUILDING
 - 54-50 EQUIPMENT STORAGE BUILDING
 - 54-51 OFFICE TRAILER
 - 54-55 SAMPLE PREP LAB BUILDING
 - 54-58 TRANSPORT PAD
 - 54-60 OFFICE TRAILER
 - 54-62 CANOPY OVER MD-35, MD-36, MD-58
 - 54-68 MODULAR STORAGE BUILDING
 - 54-69 MODULAR STORAGE BUILDING
 - 54-80 SEPTIC HOLDING TANK
 - 54-81 PCB OIL TANK STORAGE
 - 54-82 DRUM CRUSHER
 - B SURFACE IMPOUNDMENT
 - D SURFACE IMPOUNDMENT
 - LOCATION OF AREA L INACTIVE SHAFTS

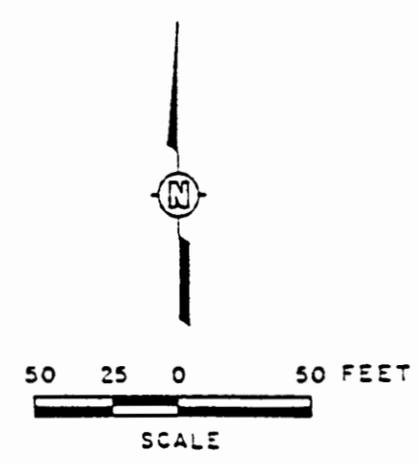
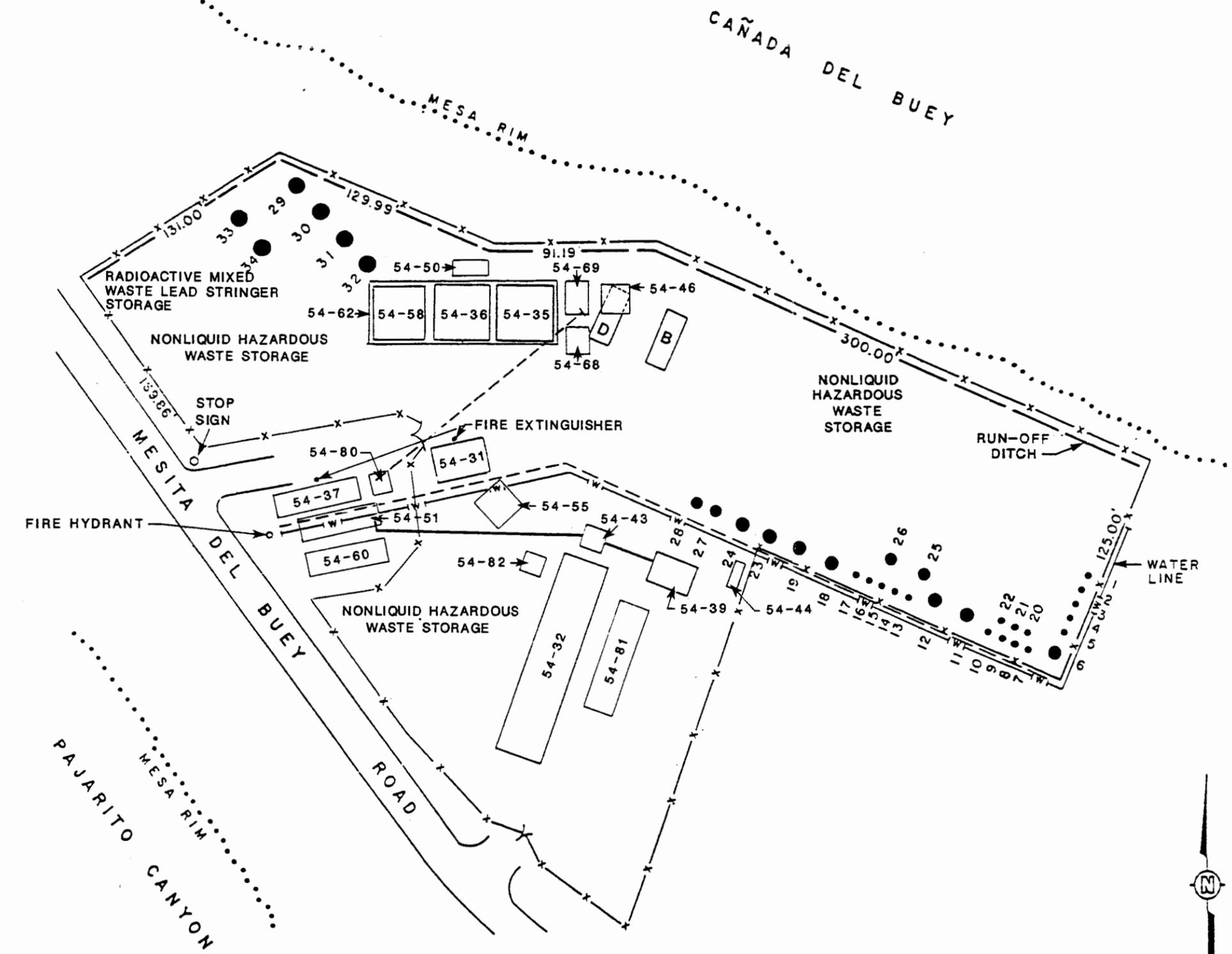


FIGURE 3
 TA-54 AREA L
 WASTE MANAGEMENT UNITS
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 NATIONAL LABORATORY
 LOS ALAMOS, NEW MEXICO

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MATERIAL DISPOSAL UNITS:

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- 54-44 PROPANE TANK
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- B SURFACE IMPOUNDMENT
- D SURFACE IMPOUNDMENT
- LOCATION OF AREA L INACTIVE SHAFTS

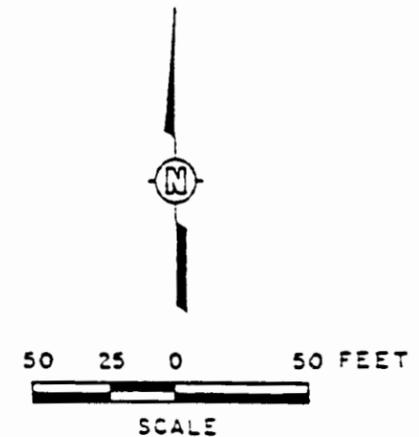
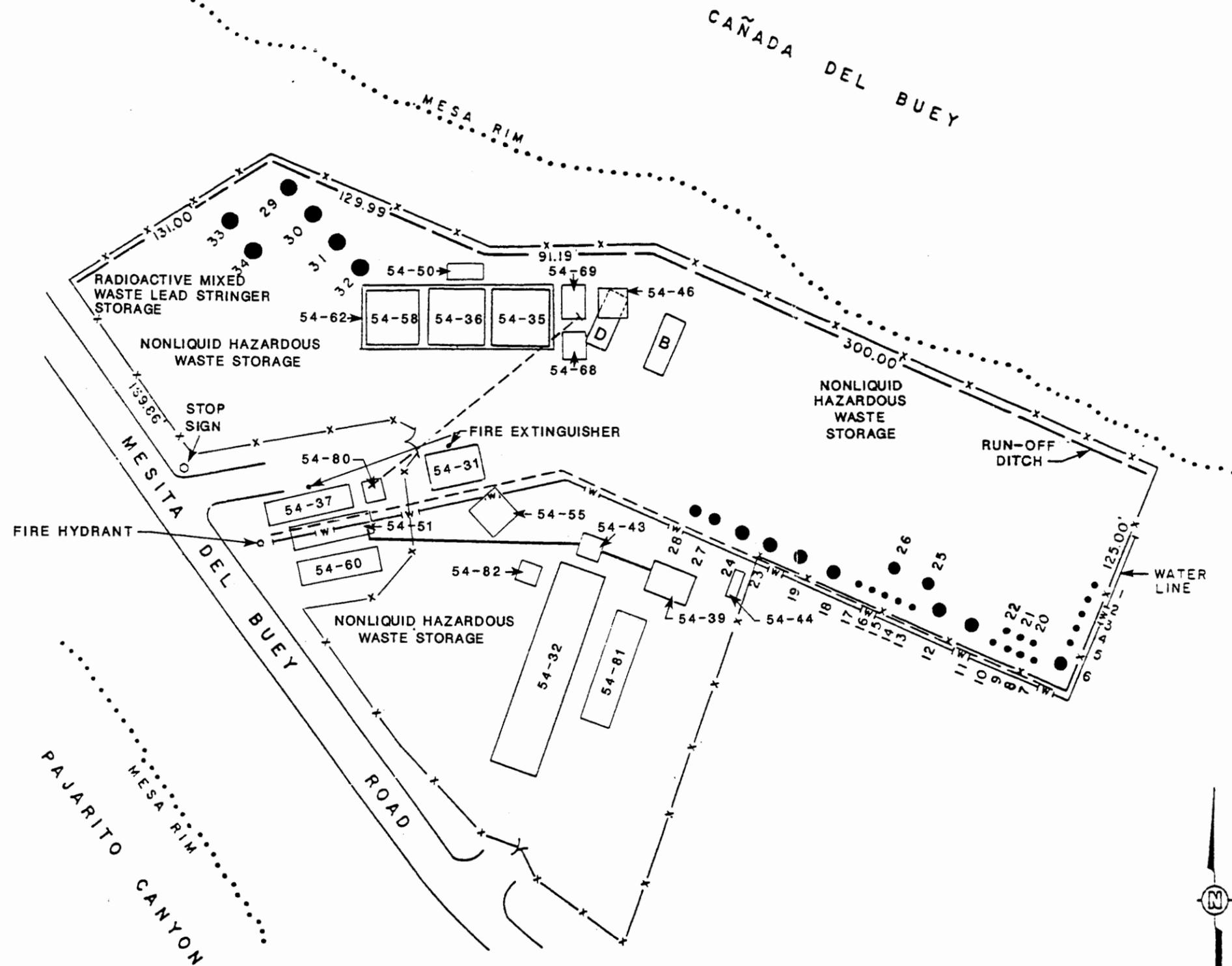
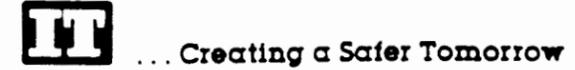


FIGURE 2-5
 TA-54 AREA L
 WASTE MANAGEMENT UNITS
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 LOS ALAMOS, NEW MEXICO



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MATERIAL DISPOSAL UNITS:

- 54-31 PACKAGING BUILDING
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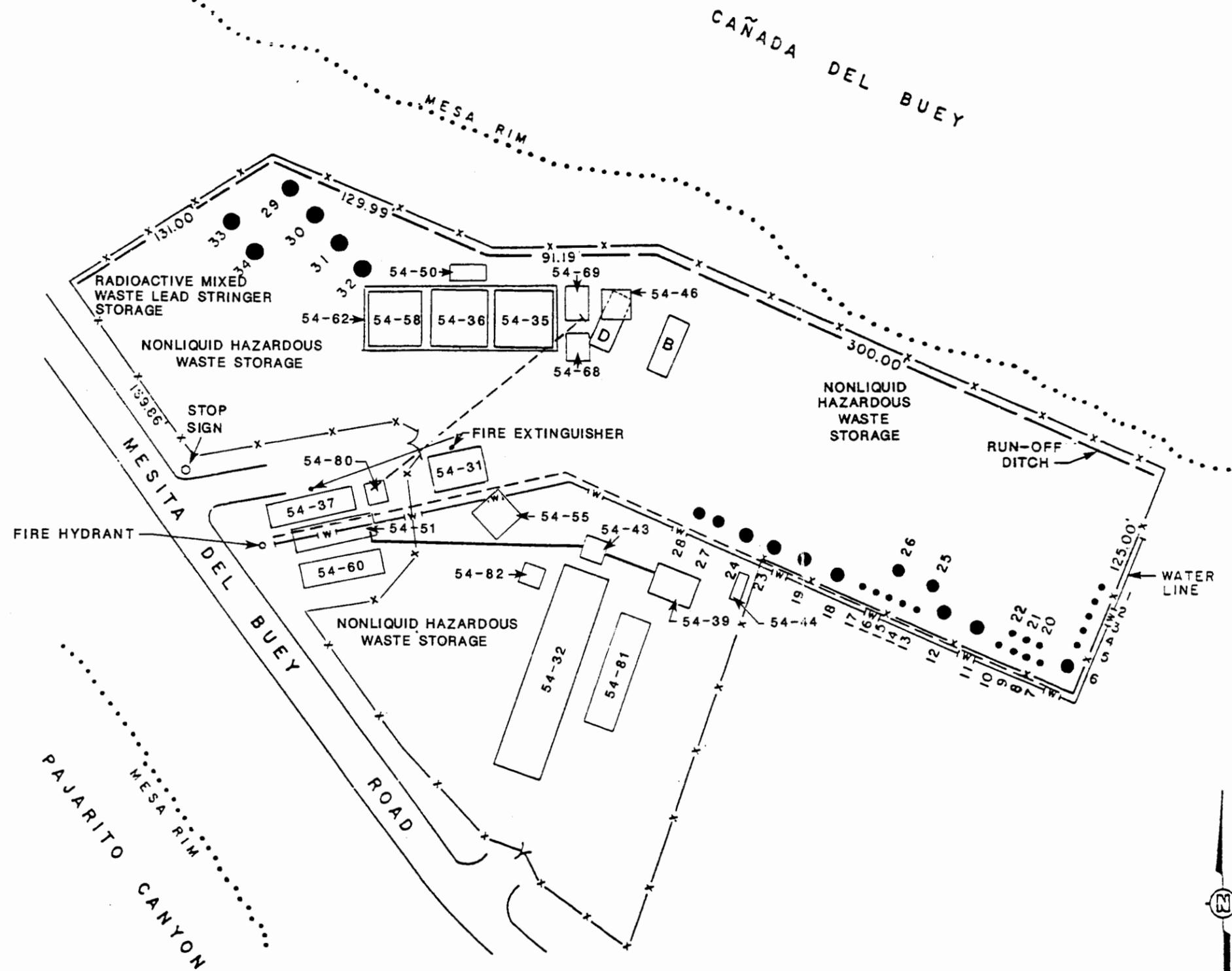
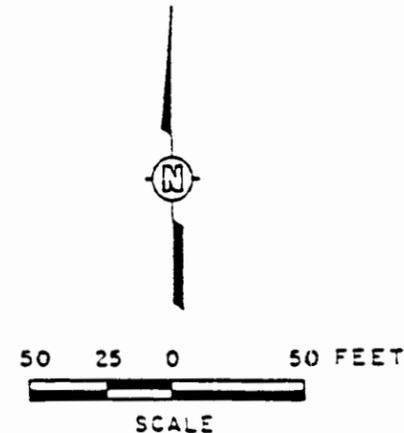


FIGURE 8
TA-54 AREA L
WASTE MANAGEMENT UNITS
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LOS ALAMOS, NEW MEXICO



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MATERIAL DISPOSAL UNITS:

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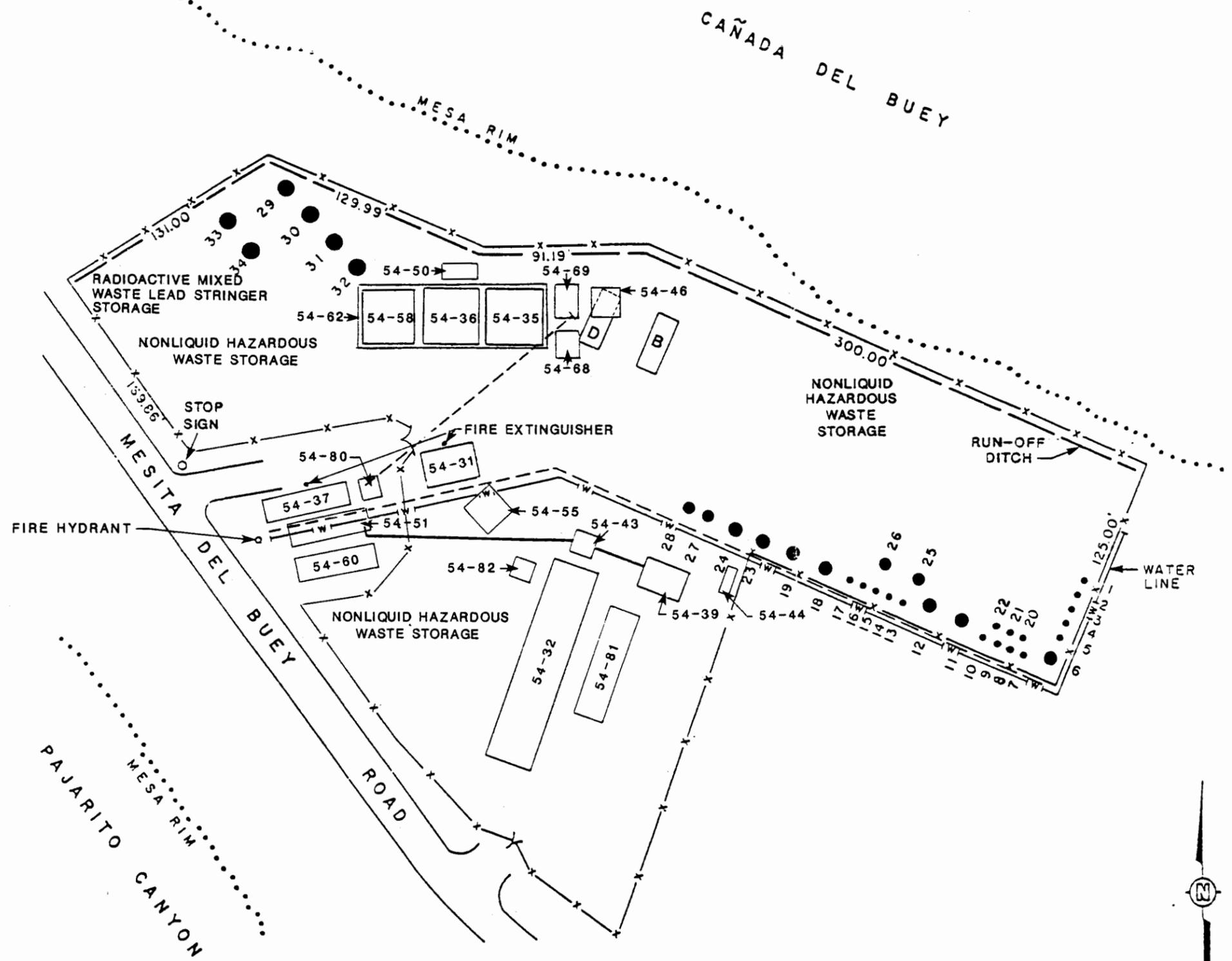


FIGURE 9-10
 TA-54 AREA L
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