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M E M O R A N D U M

To: Steve Alexander, Manager
RCRA Technical Compliance

Through: *ls* Bruce Swanton, Manager
AIP Program/LANL

TA-54

From: *Dk* Danny Katzman, AIP/LANL

Date: July 1, 1993

Subject: **Comments on LANL's proposed revision to the Voluntary Corrective Action Plan for the Organic Vapor Plume at TA-54, Area L**

It is understood that the Voluntary Corrective Action Plan (VCAP), as it appears in the RFI Work Plan for OU 1148, will be rewritten to incorporate needs of the RFI and the proposed corrective action. The revised VCAP is scheduled for submittal to the EPA on July 27, 1993. These AIP comments address Appendix A of LANL's response to EPA's NOD on OU 1148 RFI Work Plan and are provided to the Hazardous and Radioactive Materials Bureau, RCRA Technical and RCRA Permits Programs for information purposes and as a notice of the revised VCAP. It is recommended that NMED provide LANL with these comments prior to their rewriting of the VCAP.

2.4.1.4 p1

The lateral and/or vertical extent of constituents in the organic vapor plume other than TCA may be greater than that of TCA. The plume may need to be characterized uniquely for each constituent. Data from routine sampling in the vapor monitoring wells should be used to produce contour maps of each primary constituent of the plume.

2.4.1.4 p2

Air and radiation screening along fractures on canyon walls should be conducted to determine if organic or tritium vapors are emanating from the sides of the mesa.

cc: Benito J. Garcia
Barbara Hoditschek
Neil Weber



11291

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M E M O R A N D U M

To: Barbara Hoditschek, Program Manager, RCRA Permits
From: Stephanie Stoddard, Permit Writer
Re: Hazardous Waste Fees for Modifications to LANL
Operating Permit
Date: June 16, 1993

Based on our discussions with Randyl Cherry and Tracy Hughes, we should proceed with permit modifications such that we are operating in a manner equivalent to (no more stringent than) the federal regulations, i.e. Minor Modifications are Class 1 and Class 2 and Major Modifications are Class 3. Under Section 206 of the Permit Fee Regulations, Permit Modifications, **Major Modifications** are charged at the basic permit fee plus the applicable unit fee, and **Minor Modifications** are subject to a fee of \$1000.00 unless the modification involves the addition of units. Minor modifications of this type are charged "as new permits". I did not add the \$4000.00 public participation fee charged for new permits on ~~any~~ class 2 modification since we will be following the public participation requirements of 270.42. Modification request packages are grouped according to Technical Area.

This list does not include the package of LANL Modifications currently under review, ~~or the one RD&D Permit Application for FY94.~~ Titles in bold are taken from the RCRA Part A application. Titles in brackets are taken from LANL's prioritization list.

Proposed Mod Request	Mod. Class	Fee
I. <u>TA 3/15/16/21/36</u>	III	
A. TA-3-29 - S-01 2 Container storage areas. Wing 9, CMR bldg basement. [TA-3-(2) Container storage areas]		
B. TA-15-184 - T-04 Phermex Facility. Open Detonation, outdoor pad. [TA-15 Waste detonation site]		
C. TA-16-88 - S-01 Container Storage area. Building 88, MW and HW storage. [TA-16 Container storage area]		
D. TA-21-61 - S-01 Container storage area. Outdoor pad and 1/2 of building 21 -- Part A should be modified to be 2 units. [TA-21 Container storage area]		
E. TA-36-8 - T-04 Minie OD Unit. Outdoors, no pad. [TA-36 waste detonation site]		

II. TA-50

III

A. TA-50-1-60-A - T-04 Cementing Process. Cementing process for Pu rag "pacivation" [Cementing process (TA-50-a-60)]

B. TA-50-1-60-D - S-01 Container storage. For CAI. [(Building 1-60D)]see G below]

C. TA-50-37-115 - S-02 2 Storage tanks. Above ground, waste feed for CAI. [waste feed storage for incinerator]

D. TA-50-37-115/117/118 - S-02 Container storage. 3 container storage areas for CAI [(3) container storage areas (bldg 37)]

E. TA-50-37 - T-03 Incinerator. CAI permit to treat MW. [Incinerator (Bldg 37)]

F. TA-50-69 - S-01 Container storage areas. 2 units, Indoor/outdoor. [2 container storage areas (size reduction facility)]

G. TA-50-114 - S-01 Container storage area. Outdoor, portable, self-contained. [storage shed]see B above]

III. TA-54 Area G

III

A. TA-54-8 - S-01 Holding shed. [Container storage area (holding shed)]

B. TA-54 Area G - S-01 2 Storage pads over pit 30 (below pit 31 on map) [#30]

C. TA-54-33 Area G - S-01 Dome storage unit. Waste prep. facility [TA-54-33].

D. TA-54-48 Area G - S-01 Dome storage unit. Over pad # 3 [pad #3]

E. TA-54-48 Area G - S-01 Dome storage unit. Over pit 33 [33].

F. TA-54-49 Area G - S-01 Dome storage unit. Over pit 32. [not on jack's list] *may be "37" but should be included*

G. NOT INCLUDED IN PART A BUT ON JACKS LIST. [(2) container storage areas (ventilated sheds)] *Also Over Pit 33*

"37" on list not sure if they want to permit

IV. TA-54 Area G Compl. Agr. II

A. TA-54 Area G TRU pads, retrievable storage - S-01.
[Pads 1,2, 4, Domes A-D and associated domes (retrofitted) to pads 1 & 2]

V. TA-54 Area L III

A. TA-54 Area L - S-01 Container Storage pad. [Container storage pad]

B. TA-54 Area L - S-01 Container storage area. [container storage area]

C. TA-54 Area L - S-01 Gas cylinder storage area. East side. [(2) gas cylinder storage areas]

D. TA-54 Area L - S-01 Gas cylinder storage area. Near shafts. [see above]

E. TA-54 Area L - S-01 Retrievable storage shafts. 2 existing, 1 planned Pb stringers, LAMPF Activation products. [3 retrievable storage shafts]

VI. TA-55 III

A. TA-55-4 - S-01 Vault. Fee includes 2 vaults. [2 container storage units, one of which not on Part A]

B. TA-55-4 - S-01 Container storage areas 1-3. For TRU MW. [(3) container storage areas (TRU)]

C. TA-55-4 - S-01 Container storage. For oversized TRU MW [Container storage area (TRU oversized)]

D. TA-55-4 - S-01 Container storage area. For LLMW. [Container storage area (LLMW)].

E. TA-55-4 - T-04 Oxygen sparging furnace/glovebox. [Oxygen sparging furnace]

Should be salt?
F. TA-55-4 - S-01 Evaporator Bottoms Salt glovebox. 13 tanks associated with this unit. 5 cementing filtrate tanks and 8 glovebox filtrate tanks. [13 storage tanks]

G. TA-55-4 - T-04 Cementing process glovebox. [cementing process]

H. TA-55-4 - S-01 Container storage pad. [container storage pad]

IV Area G Compliance Order

Basic Permit Fee	1(10)	\$ 10,000.00
Public Participation Fee	1(4)	\$ 4,000.00
4 Dome Storage	1(5) + 3(3.5)	\$ 15,500.00
2 Retrofits	1(5) + 1(3.5)	<u>8,500.00</u>
		38,000.00

V TA-54 Area L

Basic Permit Fee	1(10)	\$ 10,000.00
4 Container Storage	2(5) + 2(3.5)	17,000.00
3 Retrieval Storage	1(5) + 2(3.5)	<u>12,000.00</u>
		43,000.00

+ Pub Part. Fee = 43,000.

VI TA-55

Basic Permit Fee	1(10)	\$ 10,000.00
8 Container Storage	2(5) + 6(3.5)	\$ 31,000.00
13 Tanks (storage)	2(5) + 11(3.5)	\$ 48,500.00
2 Treatment units	2(8)	\$ 16,000.00
		<u>109,500.00</u>

+ Pub Part. Fee = 109,000.00

I \$ 44,500.00

II \$ 73,000.00

III \$ 50,000.00

IV \$ 38,500.00

V \$ 43,000.00

VI \$ 109,000.00

358,900.00

Hazardous Waste Fees for Modifications to LANS Operating Permit

I TA 3/15/16/21/36

Basic Permit Fee	1(10)	\$ 10,000.00
Public Participation Fee	1(4)	\$ 4,000.00
5 Container Storage	2(5) + 3(3.5)	\$ 20,500.00
2 OD Treatment	2(5)	<u>\$ 10,000.00</u>
		44,500.00

II TA-50

Basic Permit Fee	1(10)	\$ 10,000.00
Public Participation Fee	1(4)	\$ 4,000.00
1 Treatment (cementing)	1(8)	\$ 8,000.00
7 Cont. Storage Units	2(5) + 5(3.5)	\$ 27,500.00
2 Storage Tanks	1(5) + 1(3.5)	8,500.00
1 Treatment (CAI)	1(15) (could be 8)	<u>15,000.00</u>
		\$ 73,000.00

III TA-54 Area G

Basic Permit Fee	1(10)	\$ 10,000.00
Public Participation Fee	1(4)	\$ 4,000.00
4 Dome Storage Units	1(5) + 3(3.5)	\$ 15,500.00
3 sheds	1(5) + 2(3.5)	\$ 12,000.00
2 Pads	1(5) + 1(3.5)	<u>\$ 8,500.00</u>
		50,000.00