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PETER MAGGIORE
SECRETARY

MEMORANDUM

TO: James P. Bearzi, Chief, Hazardous & Radioactive Materials Bureau
THROUGH: ^{SK}for Robert Stu Dinwiddie, Manager, RCRA Permits Management Program
THROUGH: ^{JK} John Kieling, LANL Facility Manager
FROM: ^{LW} Lee Winn, RCRA Permits Management Program
RE: LANL TA 54 May 14, 1999 Site Tour
DATE: July 8, 1999

The following three issues, regarding permit renewal, arose during the May 14, 1999 LANL TA54 site tour. We request to meet with you and discuss these issues and develop a strategy.

1. We need a provision in the TA-54 permit application that states when mixed transuranic (TRU) waste storage containers exceed their one year holding times they are transferred to the Federal Facilities Compliance Agreement (FFCA) with a schedule modification request. This already happens but its not stated in the permit. Therefore, the FFCA should be included in the permit. The laboratory resists this idea because the FFCA is a Compliance Order driven document, which they don't want in the permit. It is not unusual to incorporate compliance order driven documents in a permit. NASA includes the administrative order on consent within the HSWA section of it's permit.
2. We are currently reviewing the Part-A portion of the permit renewal application for administrative completeness. Do we request all disposal records of legacy waste at this time. Since the RSI has already been sent on the Part A, do we need to issue an additional one to request the legacy waste data? Reviewing the legacy waste records is a monumental task, however, it is necessary to assure that the past waste disposal has been adequately addressed as per RCRA closure, disposal and remediation.
3. Finally, TA-54 should have a Post-closure care permit in place. This agency has not called one in yet because the facility only has 180 days (plus another 180 day with an extension) to submit it after it is called-in and before we actually do. We can work with the facility by telling them that we intend to call it in. They could determine a time frame for their submittal and we would request it at a time that allows their schedule (within reason) minus the 180 days (or year based on the extension).



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This item is more complicated because the Post-closure care permit should include all of TA-54 (100 acres), the original Part A application acreage. The original Part A did not specify units but acreage. The facility will be given the opportunity to present documentation from the 1980's time frame of the original Part-A that delineates units. If they cannot, then a 100-acre TA-wide permit will be required. The essence of a post-closure permit is to include ground-water monitoring and remediation, a good idea because of the incredible quantity and activity of disposal in unlined shafts of liquid mixed waste.

We would like to meet with you and discuss these issues. Thank you in advance for your attention to this matter.

cc: Michael Chacon
John Kieling
Lee Winn
Michael Taylor
Robert Dinwiddie
LANL Red file