



LANL Permit RAW
TA-54 West
TA-54-38

Cobrain, Dave, NMENV

From: Hall, Timothy, NMENV
Sent: Wednesday, January 23, 2013 3:17 PM
To: Kieling, John, NMENV; Cobrain, Dave, NMENV
Cc: Briley, Siona, NMENV
Subject: RE: Class 2 PMR -- TA-54 West
Attachments: Comments.docx

Attached are my comments on the PMR. We can discuss some or all of these with the Permittees tomorrow. Numbers 1 and 2 are the primary reasons that we cannot proceed with approval – the PMR is incomplete. The rest of the comments are designed to help them address some of the more specific problems with the submittal.

Tim

From: Kieling, John, NMENV
Sent: Thursday, January 17, 2013 4:45 PM
To: Hall, Timothy, NMENV; Cobrain, Dave, NMENV
Cc: Briley, Siona, NMENV
Subject: Re: Class 2 PMR -- TA-54 West

Tim,
Dave informed me of some of the problems already. I am available anytime tomorrow afternoon to discuss.
John

"Hall, Timothy, NMENV" wrote:

All,

There are several problems with LANL's submittal, as outlined below.

1. They are requesting to increase storage capacity from 11,660 gallons to 47,520 gallons. Permit Attachment B, *Part A Application*, currently lists the capacity at TA-54 West as 11,600 gallons. They did not submit a revised Part A to increase the design capacity, and therefore the submittal is incomplete.
2. The PMR states that they revised the total square footage of the indoor unit in Attachment J "to illustrate the larger footprint of the entire High Bay and Low Bay as the permitted unit boundary." They did not, however, change the square footage in Attachment J. Additionally, based on the dimensions of the indoor unit in Attachments A and G.16, the current square footage in Attachment J is incorrect.
3. Figure G.16-1 includes "Loading Dock Sampling Locations" in the caption but they are revising the text in Attachment G.16 to indicate the loading dock is not part of the unit.
4. There are multiple issues and discrepancies with Figures G.17-1, 9, and 37 and their associated legends (e.g., structure "462" in Fig. G.17-1 is shown as "Canopy" in Figs. 9 and 37 and is listed in Fig. G.17-1 as a Building/Structure "not associated with the permitted unit," despite the fact that it is).

I'm still reviewing this and I'm not sure they have adequately addressed everything in 270.13 - 15. At the very least, the PMR cannot be approved based on the points above.





Can we talk about how to proceed tomorrow?

Tim Hall
New Mexico Environment Department
Hazardous Waste Bureau
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****Please note my new phone and fax numbers****

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Comments
Class 2 Permit Modification Request
TA-54 West

1. The Permittees are proposing to increase the storage capacity at TA-54 West from 11,660 gallons to 47,520 gallons. Permit Attachment B, *Part A Application*, currently lists the capacity at TA-54 West as 11,600 gallons. The PMR does not include a revised Part A to increase the design capacity, and therefore the submittal is incomplete.
2. The PMR does not adequately address all the requirements in 40 CFR 270.14, 270.15, and 40 CFR 264, and therefore is incomplete. Additionally, the PMR should include a table that shows where in the PMR (or in the Permit) the applicable regulatory requirements are addressed.
3. The PMR states that the Permittees revised the total square footage of the indoor unit in Attachment J "to illustrate the larger footprint of the entire High Bay and Low Bay as the permitted unit boundary." The PMR does not, however, propose changes to the square footage in Attachment J, Table J-1. Based on the dimensions in Attachments A and G.16, the square footage in Attachment J should be 4,560. Finally, Attachment A and Figures 9 and 37 in Attachment N of the current Permit indicate that the permitted unit already includes the entire High Bay and Low Bay, while Attachment G.16 indicates only a portion of them are permitted. The PMR should discuss this discrepancy, the need to correct it, and propose the correct square footage in Table J-1.
4. Figure G.16-1 includes the phrase "Loading Dock Sampling Locations" in the caption but the PMR proposes changes to the text in Attachment G.16 to indicate the loading dock is not part of the indoor unit.
5. There are multiple issues and discrepancies with Figures G.17-1, 9, and 37, their associated legends, and text descriptions in Permit Attachments A and G.17:
 - Structure 462 in Fig. G.17-1 is shown as "Canopy" in Figs. 9 and 37.
 - Structure 462 in Fig. G.17-1 is depicted in the legend as a building/structure "not associated with the permitted unit." Does this mean that waste is not managed within that structure?
 - Neither Structure 462 nor a "canopy" are described in Attachments A or G.17.
 - Attachment A, Section A.4.3.2, states: "Mobile radioassay trailers and storage sheds for supplies and equipment are also stored on the pad at the outdoor permitted unit (see Figure 37 in Attachment N (Figures))." Revised Figure 37 shows two storage sheds (54-1024 and 54-1025), which are discussed in Attachment G.17, but no radioassay trailers. If there are no radioassay trailers, Attachment A must be revised accordingly. Alternatively, if there are radioassay trailers on the pad, these must be included in revised Figures 37 and G.17-1, and a discussion of waste management practices in the trailers must be included in Attachments A and G.17.
 - Figure G.17-1 of the current Permit shows a structure (357) in the northern portion of the pad; the proposed revised Figure G.17-1 does not include the structure. The PMR must include an explanation of when and why the structure was removed, whether it was used to manage waste, and how it was dispositioned.

6. Due to the dramatic increase in storage capacity (~400%), the PMR should describe in more detail the waste management processes and requirements at TA-54 West, and the Permit should be revised accordingly. For example:

- The PMR states that there is a “need for an increase in the number and size of containers allowed to be stored at the RANT facility.” The PMR should describe the types of waste containers being stored at the site (NOTE: Attachment G.16, Section 2.0, states that fiberglass-reinforced plywood boxes and B25 boxes are stored in Building TA-54-38; since these containers cannot be shipped to WIPP, the Permittees should either explain why these types of containers are stored there, or revise Attachment G.16 to remove references to those containers).
- The PMR states that “final packaging and preparation activities for shipment of the Waste Isolation Pilot Plan (WIPP) take place at” TA-54 West. The PMR should describe the specific activities being conducted at the site (e.g., storage, repackaging, loading shipping containers, etc.).
- The PMR states: “An increase in the storage capacity of both units will allow for the processing of multiple shipments of standard waste boxes as well as standard drum configurations to WIPP.” The PMR also states: “To meet the goals set out within the [Framework] agreement, increased shipping capability is required from TA-54-38 West (also known as RANT facility).” Since there will be an increase in the number of shipments of waste into and out of the RANT, The PMR should discuss changes in traffic volume and patterns and their potential impacts on worker safety, human health, and the environment.
- Permit Part 3, Section 3.12.1, allows the Permittees to “store mixed TRU wastes in sealed Nuclear Regulatory Commission (NRC) certified Type-B shipping containers at the TA-54 West Outdoor permitted unit without secondary containment and weather protection.” However, the PMR does not discuss secondary containment or weather protection for waste containers stored at the RANT before they are loaded into the NRC Type-B shipping containers. Since the WIPP WAC allows for up to 1% liquid in containers that are shipped to WIPP, the PMR should discuss how the Permittees provide secondary containment at TA-54 West indoor and outdoor storage units, and the Permit should be revised accordingly.